

Mortlake Brewery – Response to Planning Applications 22/0902/FUL and 22/0900/OUT

Commented [AF1]:

Dear Planners

OBJECTION: The former Stag Brewery site, Mortlake

I have been contacted by residents from Mortlake & Barnes Common Ward regarding the planning proposals for the former Stag Brewery in Mortlake. All of those who have contacted me, have asked me to support their objections to planning applications 22/0902/FUL and 22/0900/OUT for one or more of the reasons below:

Summary

1. Townscape and Visual – The height, scale and density of the development is overpowering and not sympathetic with or in character to the local area. In particular, 9/21 buildings are above 6 storeys and in line with policy should be reduced. The development plans were drawn up 7 years ago and reflect thinking around that time. Recent policies now incorporate more ‘green’ aspects for example G8 food growing and LP17 green walls and roofs. The plans should be updated to reflect this more visionary approach.
2. Affordable Housing - The indicative quantum of affordable housing of 17% of habitable units is too low, a higher quantum is viable if the developers actual finance costs are used. In line with policy and identified need, there should be more family homes for social rent in the plan.
3. Watney’s Sports Field - The footprint of the existing Watney’s Sports Field should be retained, in line with policies to retain existing green space. A reduced school footprint is proposed to accommodate this.
4. Healthcare - The Primary Healthcare Care system in this area is already operating at capacity. There is no forward plan for primary healthcare provision for the forecast increase in population of 2,472 and a payment of £495,660 is not sufficient to mitigate the residual negative impact. A new or satellite GP surgery should be reinstated on site.
5. School - There is a cheaper, local school leader supported, alternative to the proposed secondary school, which will flexibly provide the 180 p.a. secondary school places forecast by LBRuT. It is prudent to conduct a feasibility study into this proposal with other LAs who are within 3 miles of the site, in line with policies that require capacity to be considered on a locality basis.
6. Transport - The Chalkers ‘light’ scheme proposed is inadequate for a site with a PTAL rating of 1 and 2, before additional traffic resulting from the closure of Hammersmith Bridge is included. In line with policy, the lack of mitigation measures for disruption during construction is also inadequate given the PTAL rating. In line with policy, the PLA support a river scheme to carry construction materials and this should be a planning condition.
7. Air Quality – This is an area of focus within LBRuT due to the poor Air Quality. In contravention of policy, there are no mitigation measures proposed for the decline in Air Quality resulting from development, which is inadequate.

Detailed provisions to support these objections are set out below. If you have any queries, please do not hesitate to contact me.

Yours sincerely,

Cllr. N. Crookdake

Green Councillor for Mortlake & Barnes Common



1. Townscape & Visual - Height, Scale, Density of the build

The Site is located within the Mortlake Conservation Area which encompasses the Maltings, the (former) Hotel and the (former) Bottling buildings. In addition, the Mortlake Green Conservation Area bounds the Site to the south.

The Council consultation concluded that the local community wanted a lower density, high quality housing scheme which was sympathetic to the surrounding character of the area, including its historic buildings to protect local character. The current scheme includes 21 buildings on a 8.6 hectare site, where 9/21 are 'tall' buildings rising to 9 storeys.

When assessing cumulative impact of the scale of the development, it is clear that the building height, massing and scale is not sympathetic to the local character, history, and context of the area as required by NPPF, London Plan, LBRuT plan and the council's own Development Plan for the site, in contravention of the planning policies below. In addition, planned availability and capacity of infrastructure and services for healthcare and transport are not sufficient for a build of this density (see 4 & 6 below), again in contravention of planning policies. The development plans were drawn up 7 years ago and reflect thinking around that time. Recent developments now incorporate more 'green' aspects (growing, walls, roofs etc) for example included in policies G8 (food growing) and LP17 (green walls and roofs). These proposals have not been updated to reflect current thinking and therefore miss an opportunity to include this visionary approach. In line with policies below, growing/allotment space should be provided for within the development along with green walls/roofs.

Relevant Policies

Policy	Description
National Planning Framework 2021	para 124 – Achieving appropriate densities c) the availability and capacity of infrastructure and services – both existing and proposed. (d) the desirability of maintaining an area's prevailing character and setting. para 130 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting

<p>London Plan 2021 D9 Tall Buildings (6+ storeys) G8 – Food Growing</p>	<p>D9 B. Locations - Only in identified 'suitable' locations C. Impacts - 1. Visual f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views. 2. Functional d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building</p> <p>G8 A In Development Plans, boroughs should: 1) protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites 2) identify potential sites that could be used for food production. Guidance: 8.8.1 Providing land for food growing helps to support the creation of a healthier food environment. At the local scale, it can help promote more active lifestyles and better diets, and improve food security. Community food growing not only helps to improve social integration and community cohesion but can also contribute to improved mental and physical health and wellbeing.</p>
<p>Richmond Local Plan 2018 Density, Mass & Scale</p>	<p>LP2 Tall Buildings – 2.respect the local context, and where possible enhance the character of an area, through appropriate: a. scale b. height c. mass 3.1.11 The borough has an outstanding built, historic and natural environment and a key priority of the Spatial Strategy is that this unique local character continues to be protected and enhanced throughout the borough. The different village areas and their special character within the borough, including those along the River Thames and its banks, will be maintained and enhanced, and historic views and the setting of heritage assets will be protected. In established residential areas the historic character as well as local biodiversity and trees will be maintained. 4.2.8 The Advice Note on Tall Buildings produced by Historic England should be followed. SA 24 Mortlake Development Any development should respond positively to the Conservation Area, including the setting of the listed buildings (Grade II) to the north of the site.</p> <p>LP 17 Green roofs and walls Green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof. The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if</p>

	it has been demonstrated that a green / brown roof is not feasible. The use of green / brown roofs and green walls is encouraged and supported in smaller developments, renovations, conversions and extensions.
Historic England Advice Note 4 Assessing Cumulative Impact	6.5 It is important for LPAs to consider cumulative impacts of tall building proposals with other existing tall buildings, to fully understand the impacts they might have
LBRuT Mortlake Development Plan 2011	<p>1.17 The conclusion from the consultation was that the lower density high quality housing schemes with community benefits including a primary school/ community hub, open space (including retention of existing playfields and creation of new open space links), leisure uses such as a museum, craft centre, café and community space and boat house and small scale employment spaces was the most favoured approach</p> <p>5.26 The integration of these buildings with the development of the site will need to be carefully considered with special attention paid to preserving their setting and preserving or enhancing the character or appearance of the Conservation Area.</p> <p>5.29 The Council will need to be assured that the development will integrate and link visually, functionally and in townscape terms of the rest of the surrounding area</p> <p>5.31 If taller buildings are necessary to ensure a viable scheme higher building could be located at the core of the site, generally where the larger and higher existing buildings are located, and that height and scale diminish towards the perimeter of the site or along the Riverside</p>

2. Affordable Housing

In line with the policies below, all developments over 10 units are required to provide Affordable Housing. Where the percentage is less than 35%, the Developer is required to submit a viability assessment to confirm the maximum level of affordable housing that a scheme can deliver. For the purposes of testing the viability of the proposals, the viability assessor, BNP Paribas Real Estate has indicatively tested buildings 10 (shared ownership) and 18 (social rent) as affordable, which equates to 16% of units and 17% of habitable rooms. They have tested a range of tenure splits (20% rent, 80% shared ownership; 50% rent and 50% shared ownership; and 80% rent and 20% shared ownership).

Quantum of Affordable Housing

The model used to test the viable amount of Affordable Housing uses a 6% finance (discount) rate which significantly reduces the Residual Land Value attributable to the developer, which in turn reduces the amount of affordable housing which the developer needs to provide. If the developer's actual finance costs of 1.7% were included in the model a much higher percentage of Affordable Housing would be viable, very likely in line with the Mayor's target of 35%, although still below Richmond's stated target of 50%. Para 3.27 provides that a standardised approach is 'generally' taken, although it

does allow for flexibility, in that it says, ‘this may vary according to the scale and nature of the scheme’. Given the vast difference in viable Affordable Housing between the two rates, the LPA and GLA should confirm what the viable Affordable Housing would be if the developer’s actual finance cost was used and adjust the contribution accordingly.

Relevant Polices

Policy	Description
Mayor of London Homes for Londoners 2017	3.27 A standardised approach will generally be adopted to finance costs which should be justified according to the specific proposal, reflecting varying interest costs (if applicable) throughout the development period and presales (including to RPs). The standardised approach assumes that developers will incur generic average finance costs based on standard market rates, though this may vary according to the scale and nature of the scheme.
London Plan 2021 H4 – Delivering Affordable Housing H5 – Viability requirements	<p>4.4.3 Schemes that do not meet the [35%] threshold will be required to submit detailed viability information which will be scrutinised and treated transparently. Comprehensive review mechanisms will be applied in order to ensure that affordable housing contributions are increased if viability improves over time.</p> <p>4.4.4 Schemes are expected to deliver at least the threshold level of affordable housing without grant or public subsidy and to increase this proportion through the use of grant and other subsidy, where available. Only where there are clear barriers to delivery and it is fully justified through detailed viability evidence, in line with the methodology and assumptions set out in Policy H5 Threshold approach to applications and the Mayor’s Affordable Housing and Viability SPG, should a lower level of affordable housing be considered.</p> <p>4.5.2 The Viability Tested Route will assess the maximum level of affordable housing that a scheme can deliver in cases where the threshold level of affordable housing cannot be met and where fixed or minimum affordable housing requirements are not in place. It is possible that, via the viability assessment using the detailed methodology in the SPG, a greater affordable housing contribution than the threshold level will be found to be viable and thus will be required.</p>
Richmond Housing & Homeless Strategy 2021 -2026 (page 11)	<p>We will:</p> <ul style="list-style-type: none"> • Work proactively with PRPs, private developers .. and the GLA to increase the delivery of affordable homes including building a pipeline of 1,000 affordable homes to be delivered over the next 10 years. • Make best use of financial assets and resources, both Council, housing association and charitable sector, to deliver more affordable housing. This will include on Council owned sites seeking a minimum of 50% affordable homes and aiming to achieve significantly higher than this where possible..

- Through the Council's housing and planning policies support PRP development to deliver 100% affordable housing schemes

Mix of Affordable Housing

The current plan assumes that Building 10 (shared ownership) and 18 (social rent) provide the following Affordable Housing.

	1 bed, 2 person	2 bed, 4 person	3 bed	4 bed
Building 10	27 units (around 50 sqm's)	21 units (around 70 sqm's)		
Building 18		49 units	64 units	6 units

The policies below require the plan mix of Affordable Housing to match identified need. The latest Strategic Housing Market Assessment was completed in 2016 and should be updated. However, on this basis, and in line with the Richmond Plan, there is demand for larger family homes. In line with planning policies, the development should have less 1 bed units and more larger units within the Affordable Housing mix in Building 10. London Plan, 4.5.3 provides that habitable homes across Affordable and Market classes should be a comparable size. The Affordable units in Building 10 are in line with, or just above the minimum design standards however the 1B2P and 2B4P Market units are around 30% bigger. In line with policy, the comparable units should be more equal in size.

Relevant Policies

Policy	Description
National Planning Framework 2021 -	62. ... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies
London Plan 2021 H10 – Housing Mix D6 – Minimum Design Standards	4.5.3 The percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using habitable floorspace. Applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison. D6 – Table 3.1 – minimum design standards for 1B2P = 50 sq'ms, 2B4P = 70 sqm's H10 – Housing Size Mix

	<p>A Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:</p> <p>1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment</p> <p>4.10.4 One-bedroom units play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes. However, one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.</p>
Richmond Local Plan 2018	<p>3.1.29 Affordable housing is a priority in the borough .. Therefore, the Council will pursue all opportunities to maximise affordable housing through a range of measures, including providing more choice in the different types of affordable housing with the aim to provide for different levels of affordability.</p> <p>3.1.31 The Local Plan ensures that developments will provide for a choice in housing types and sizes. Generally, the Spatial Strategy is to seek family sized accommodation in the borough, particularly within the residential areas; in the borough's centres, a higher proportion of small units would be appropriate. Opportunities for younger people to get on the housing ladder and downsizing for older people to smaller units were identified in consultations with local communities. Therefore, the Local Plan will ensure that developments provide an appropriate housing mix that reflects local needs and which is appropriate to the location in which the development is proposed</p>
Richmond Housing & Homeless Strategy 2021 -2026 (page 11)	<p>We will:</p> <ul style="list-style-type: none"> • Deliver a range of affordable homes that meet the needs of local residents and workers. This will include developing housing offers for local key workers, improved supported housing ..
Mortlake Development Plan 5.22	<p>The Council will therefore support a mixed tenure residential led mixed use development provided there is a range of other uses to create a vibrant Riverside area and associated employment and leisure opportunities. This should include family housing and the maximum reasonable provision of affordable housing of appropriate tenure mix,</p>
Strategic Housing Market Assessment, Final Report, December 2016 London Borough of Richmond upon Thame	<p>Table 53: Estimated Size of Dwellings Needed 2014 to 2033 – Market Housing – Richmondupon-Thames (GLA SHLAA CLG – constrained</p>

Size	2014	2033	Additional households 2014-2033	% of additional households
1 bedroom	9,707	9,450	-257	-8.3%
2 bedrooms	21,977	22,776	799	25.9%
3 bedrooms	20,931	22,321	1,390	45.0%
4+ bedrooms	19,842	21,000	1,158	37.5%
Total	72,458	75,548	3,090	100.0%

Source: Housing Market Model

Tenure of Affordable Housing

The Strategic Housing Market Assessment below identified the need for 20% intermediate and 80% social rent. On this basis, in line with the policies below, at least 70% of the Affordable Housing should be social rent.

Relevant Policies

Policy	Description
National Planning Framework 2021 -	62. ... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies
London Plan 2021 H6 – Housing Tenure	H6 Affordable Housing Tenure A The following split of affordable products should be applied to residential development: 1) a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership 3) the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
Richmond Local Plan 2018	3.1.29 Affordable housing is a priority in the borough .. Therefore, the Council will pursue all opportunities to maximise affordable housing through a range of measures, including providing more choice in the different types of affordable housing with the aim to provide for different levels of affordability.

Mortlake Development Plan 5.22	The Council will therefore support a mixed tenure residential led mixed use development provided there is a range of other uses to create a vibrant Riverside area and associated employment and leisure opportunities. This should include family housing and the maximum reasonable provision of affordable housing of appropriate tenure mix,																												
Strategic Housing Market Assessment, Final Report, December 2016 London Borough of Richmond upon Thame	<p>9.53 Given the range of figures the following is suggested as a reasonable tenure mix for affordable housing across the Borough: 20% - intermediate housing 80% - social and affordable rented housing</p> <p>Table 60: Gross Need for Intermediate Affordable Housing</p> <table border="1" data-bbox="434 517 1272 735"> <thead> <tr> <th>Component of need (all per annum)</th> <th>Afford 80% of market rents</th> <th>Cannot afford 80% of market rents</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Current need (with housing)</td> <td>18</td> <td>70</td> <td>87</td> </tr> <tr> <td>Current need (without housing)</td> <td>3</td> <td>22</td> <td>25</td> </tr> <tr> <td>Newly forming households</td> <td>211</td> <td>733</td> <td>944</td> </tr> <tr> <td>Existing households falling into need</td> <td>37</td> <td>244</td> <td>281</td> </tr> <tr> <td>Total</td> <td>270</td> <td>1,068</td> <td>1,338</td> </tr> <tr> <td>Percentage of total</td> <td>20%</td> <td>80%</td> <td>100%</td> </tr> </tbody> </table>	Component of need (all per annum)	Afford 80% of market rents	Cannot afford 80% of market rents	Total	Current need (with housing)	18	70	87	Current need (without housing)	3	22	25	Newly forming households	211	733	944	Existing households falling into need	37	244	281	Total	270	1,068	1,338	Percentage of total	20%	80%	100%
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3. Retaining Watney’s Sports Field

The Watney’s Sports Ground playing fields within the Site is locally designated as Other Open Land of Townscape Importance (OOLTI), as per Policy LP14 of LBRuT’s Local Plan9 (July 2018 and March 2020). The OOLTI designation is to safeguard open land which contributes to local character and open land which is valued by residents in the context of a built-up area.

The local community wish to retain the playing field in its current size as it will be the only large open space in an area which is soon to be heavily developed. The removal of the field is in contravention of the policies listed below. Whilst the proposals to improve the field are welcome, they do not mitigate against the loss of green open space and are not equivalent in terms of openness or quantum. The new secondary school is planned to be built over part of this area. A feasibility study for a smaller school on the STAG site (see 5 below) is preferred which would enable the current sized field to be retained.

Relevant Policies

Policy	Description
National Planning Framework 2021 -	99. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

Open space and recreation	(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or (b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or (c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
London Plan 2021 G4 Open Space S5 Sports and recreation	G4 B Development Proposals should not result in the loss of protected open space S5 – as above NPF
Richmond Local Plan 2018 SA 24	SA 24 The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovion and upgrading, where a comprehensive approach to redevelopment can be taken in line with policy LP 14, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, reprovion and upgrading of the playing fields within the site for sport uses has to be carried out in line with policy LP 31, the NPPF and Sport England Policy.
LBRuT Mortlake Development Plan 2011	1.17 The conclusion from the consultation was that the lower density high quality housing schemes with community benefits including a primary school/ community hub, open space (including retention of existing playfields and creation of new open space links), leisure uses such as a museum, craft centre, café and community space and boat house and small scale employment spaces was the most favoured approach

4. Healthcare

Currently the Financial Viability Assessment includes a S106 payment in Table 4.10.1 of £495,660 to mitigate the additional demand by the new population of the development for primary health care. There is an assessment in the Environmental Statement, Chapter 21 – Summary of Mitigation Measures, that the likely residual effect is insignificant.

The Environmental Statement, Socio-Economic Chapter 7, 7.58-7.62 and 7.121-7.124 estimates population growth of around 2,472 from the STAG development. Within the Sheen, Kew and Barnes Primary Care Network, there are three other residential developments also taking place, at Kew Retail Park, Homebase and Barnes hospital. The Health Impact Assessment, March 2022 commissioned by the developer refers to capacity in the existing GP surgeries within 1km of the site, which is incorrect, as the two surgeries are already operating close to the London Healthy Urban Development Unit

benchmark of FTE GP: 1,800 patients. The initial STAG plans, included a GP surgery, which given the health needs arising from the increase in resident population and proposed school population, seems sensible. Contrary to the policy, there has been no long-term forward plan to accommodate the population increase from this or the other developments within the PCN, and a mitigation payment of £495,660 will be insufficient to provide the additional capacity required. It is very difficult to find suitable space for a new or satellite GP practice, and therefore the STAG development provides a unique opportunity to do that. In line with the policies below, it seems prudent to reinstate a new or satellite GP surgery in the plan.

Relevant Policies

Policy	Description
National Planning Framework 2021	<p>20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision ¹³ for:</p> <p>(c) community facilities (such as health, education and cultural infrastructure);</p> <p>22. Strategic policies should look ahead over a minimum 15 year period from adoption ¹⁵, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.</p> <p>93. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should (b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</p>
London Plan 2021	<p>Policy S2 Health and social care facilities</p> <p>A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:</p> <ol style="list-style-type: none"> 1) identify and address local health and social care needs within Development Plans, taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies 2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes 3) undertake a needs assessment to inform Development Plans, including an audit of existing health and social care facilities. Needs should be assessed locally and sub-regionally, addressing borough and CCG cross boundary issues 4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision and to address needs across borough boundaries 5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.

	B Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported. C New facilities should be easily accessible by public transport, cycling and walking.
Richmond Local Plan 2018 LP28	Impacts on existing social infrastructure E. Development proposals for 10 or more residential units should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient capacity within the existing infrastructure to accommodate the needs arising from the new development
LBRuT Mortlake Development Plan 2011	5.2 The Council also recognises that the development will increase the pressure on local health services and appropriate planning contributions will be sought to increase local capacity.

5. 1200 capacity Secondary School

Application B is for a new 1200 capacity (180 pupils p.a.) secondary school on the south west of the site. The Mortlake 2011 Planning Brief included a primary school on the site. This was changed in October 2015, following a LBRuT Council's Cabinet decision that a secondary school with a sixth form would be preferred. The school footprint in part covers Watney's field (see above 3). The school includes a newly provisioned sports pitch, Multi-Use Games Area and small community park to the south with the installation of a 2.5m high clear acoustic fence around the northern and western perimeter of the school sports pitch, set back from the proposed 4.5m high twin bar super rebound fence (mesh weld fence with EPDM inserts) surrounding the sports pitch; and the installation of a 3m high fence around the Multi-Use Games Area. A community use agreement will enable local groups, clubs etc. to use the external pitch, indoor sports hall and the Multi-Use Games Area out of school hours.

The secondary school has been the most controversial aspect of the scheme and is opposed by local school leaders. In 2015, there was limited 'Good' secondary school places on the east side of Richmond borough and the birth rate was increasing. Consequentially, Richmond and the DFE agreed to place a 1200 secondary school on the STAG Brewery site, with a current estimated cost of around £40m. However, seven years later circumstances have changed. All surrounding secondary schools are now rated 'good'. There has been a decline in the birth rate and significant relocations due to a post-covid change in working patterns, have reduced primary school admissions.

LBRuT maintain that there is a continued need for 180 secondary school places on the STAG Brewery site, in part because of recent enquiries from Hong Kong families relocating to the UK. Hounslow (the Borough which neighbours the site), has taken an opposite view and the forecasts for the Chiswick side of the ward show the decline in primary admissions continuing into secondary schools. Hounslow and other London Councils are currently discussing how to best manage the decline in pupil numbers that they are witnessing across London Boroughs.

Given the conflicting forecasts, but appreciating LBRuT's excellent track record in this regard, the local school leaders propose the following plan to provide the 180 capacity p.a, flexibly, if required:

Thomson House, a current 2 form entry primary (total capacity of 400 pupils) relocates to the site and expands to provide a 4 form entry secondary school for years 7-11 (age 11-16), providing capacity for an extra 120 secondary school children each year on the STAG Brewery site, resulting in total secondary school capacity for 600 pupils;

Richmond Park Academy and Chiswick school each located close to the site, expand by 1 form entry (30 students each) providing an extra 60 secondary school places each year, if demand requires, subject to review and agreement by the Governors and each Trust.

The advantages of this scheme are compelling:

For Thomson House primary school pupils:

- It currently has no outside space and is located on a dangerous level crossing. In line with policy, the relocation creates a safe environment for the pupils with outside facilities;
- The 400 pupil primary and 600 pupil secondary school should occupy a smaller footprint on the site, enabling the current field to be maintained and potentially more Affordable Housing to be provided.

For local secondary school pupils:

- The 120 secondary places are provided at the development, more than sufficient for local demand forecast by LBRuT from this development and other developments in the area.

The scheme is very likely to have community support, given the priority of the local campaign group to keep the field for community use and relocate Thomson House.

The proposed scheme is likely to cost significantly less than £40m which the DFE has set aside for the build, at a time when public funds are under severe pressure. Thomson House's own buildings, currently valued at £6.7m, could be sold to help fund the scheme and the vacant buildings used to provide more Affordable Housing in the area.

There is an alternative scheme that provides forecast secondary capacity more flexibly that has local school leader support. A feasibility study for this option should be undertaken. LBRuT's case for a 1200 secondary school rests on the need for additional capacity as there is insufficient capacity from the 3 Richmond schools within 3 miles of the STAG development – Richmond Park Academy, Christ's and GreyCourt. As the site is in London, it borders a number of other LA's. Within 3 miles of the site, there are 17 secondary schools (16 of which are closer than Greycourt) which have a current surplus capacity of at least, 3,668 listed on the Gov.UK website (see Appendix I). In line with the Policies below, it is LBRuT's responsibility to co-ordinate and assess capacity needs 'locally and sub-regionally, addressing cross-boundary issues'. The Environmental Statement Chapter 7 'Socio-Economics' inaccurately lists schools within the Spital Area of 3 miles from the site in Table 7.10 as it does not consider the capacity provided locally from schools

outside LBRuT's boundary. The revised proposal reduces the capacity on site to accommodate this. It has the added advantage of reducing the school's pupil footprint, which should increase the size of the retained field (see 3 above) and upgraded sports equipment.

Relevant Policies

Policy	Description
National Planning Framework 2021	<p>95. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</p> <p>(a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and</p> <p>(b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.</p>
London Plan 2021 S3 - Education and childcare facilities	<p>A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:</p> <ol style="list-style-type: none"> 1) prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. Needs should be assessed locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities. 2) identify sites for future provision through the Development Plan process, particularly in areas with significant planned growth or need for school places (including Special Educational Needs and Disability places) 3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.
Richmond Local Plan 2018 LP29	<p>A. The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by the following means:</p> <ol style="list-style-type: none"> 1. supporting the provision of facilities to meet the needs for primary and secondary school places as well as pre-school and other education and training facilities; 2. safeguarding land and buildings in educational use; 3. identifying new sites for educational uses as part of this Plan; the Council will work with landowners and developers to secure sites for pre-schools, primary and secondary schools as well as sixth forms to ensure sufficient spaces can be provided for children aged 2-18;

	<p>4. encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs;</p> <p>5. encouraging flexible and adaptable buildings, multi-use and co-location with other social infrastructure</p>
LBRuT Mortlake Development Plan 2011	5.20 The Council will support the provision of a twoform entry Primary School designed to maximise the potential for community uses and developers should discuss this with the Council at the earliest opportunity to form part of master planning proposals.

6. Transport

The Transport for London (TfL) online Public Transport Accessibility Level (PTAL) calculation tool¹ has been used to calculate the PTAL of the Site. The Site at present has a PTAL rating of predominantly 2 with a PTAL rating of 1 at the western corner of the Site, which represents a ‘poor’ and ‘very poor’ level of accessibility to public transport services, respectively. Hammersmith Bridge is currently closed to traffic, which has had a negative impact on the operation of Chalkers Corner at peak times, with Transport for London (TfL) stating that Chiswick Bridge is experiencing a significant increase in vehicular traffic due to the reduction in the number of crossing points for vehicles over the River Thames. **There is currently no date set for the reopening of Hammersmith Bridge, the longer it remains closed, the less likely it is to reopen.**

Commented [AF2]: Rather than saying no plans to open the bridge, isn't more correct to say there is no date set for the reopening of the bridge?

The Mortlake Planning Brief indicated that redevelopment at the Site must consider existing traffic issues including congestion, and that redevelopment should minimise adverse effects to the surrounding area and the amenity of nearby residents. The site area has an existing rating of poor or very poor accessibility to public transport. A comprehensive consultation with TfL identified that the operation of the junction with the A316 (Clifford Avenue) and Lower Richmond Road at the Chalkers Corner junction and in particular, congestion and delay on Lower Richmond Road was a key design consideration and an increase in capacity at Chalkers Corner was necessary to facilitate the development. The proposals include a Chalkers Corner 'Light' Scheme, with a new left-hand lane westbound on Lower Richmond Road, resulting in the loss of 6 car parking spaces.

Prior to development the site PTAL rating of 2 and 1 would indicate that significant mitigation is required to improve transport infrastructure before development begins. The data contained within Environmental Statement, Chapter 8 relating to Transport was taken in 2016/2017 and has not been updated and para 8.33 of Chapter 8, state that ‘the impact of Hammersmith Bridge closure has been excluded from this assessment’. As the closure of Hammersmith Bridge in 2019 has significantly increased traffic in this area, no meaningful conclusions can be drawn from the data and the tests should be repeated. The following conclusions in chapter 8 are illogical given the PTAL rating, consultation conclusions, increase in traffic problems following Hammersmith Bridge closure, scale of the development and the congestion that is already on the main roads around the site:

In para 8.173 that during 7 years of construction no mitigation is required. A feasibility study of the use of the river for transporting goods during construction is supported by the Port of London Authority and should be undertaken. Significant mitigation is needed to remove residual likely effects.

That the chalkers 'light' proposals will mitigate traffic issues after completion. Significant mitigation is required for traffic, protection for cyclists and pedestrians to remove residual likely effects.

Relevant Policies

Policy	Description
National Planning Framework 2021	<p>104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <ul style="list-style-type: none"> (a) the potential impacts of development on transport networks can be addressed; (b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; (c) opportunities to promote walking, cycling and public transport use are identified and pursued; (d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. <p>106 (c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</p>
London Plan 2021 T4 Assessing and mitigating transport impacts	<p>C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.</p> <p>D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.</p> <p>10.4.3 It is important that development proposals reduce the negative impact of development on the transport network and reduce potentially harmful public health impacts. The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. The other main impacts on public health relate to air quality, road danger, noise, and severance.</p>
Richmond Local Plan 2018 LP 44	<p>B. Walking and cycling Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks</p>

	<p>C. Public transport Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided. Protect existing public transport interchange facilities unless suitable alternative facilities can be provided which ensure the maintenance of the existing public transport operations. Applications will need to include details setting out how such re-provision will be secured and provided in a timely manner</p> <p>D. The road network Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements. In assessing planning applications the cumulative impacts of development on the transport network will be taken into account. Planning applications will need to be supported by the provision of a Transport Assessment if it is a major development, and a Transport Statement if it is a minor development</p>
LBRuT Mortlake Development Plan 2011	5.35 A Transport Assessment will be necessary to consider the impact of vehicular traffic within and around the site as a whole. Development proposals will need to take into account impact on traffic congestion and air quality, impact on the historic environment and impact on local residents. Appropriate improvements to highways and public transport provision will need to be identified

7. Air Quality

LBRuT have declared the entire Borough as an Air Quality Management Area (AQMA) owing to the Borough-wide levels of nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀) which do not meet the Air Quality Strategy Objectives. Consequently, LBRuT have prepared an Air Quality Action Plan, setting out the policies and measures to be implemented to improve air quality in the LBRuT. It is considered that concentrations in the area surrounding the Site are highly influenced by vehicle emissions. The NO₂ diffusion tube monitoring study in the Environmental Statement, Chapter 10 was undertaken for a 6-month period, from July 2018 to January 2019, before Hammersmith Bridge was shut.

Given the increase in traffic since Hammersmith Bridge was shut, the results in chapter 10 of the Environmental Statement are not meaningful and should be repeated. There is more current data available as Air Quality is monitored around the site areas regularly. The 2019 data showed 5/6 sites in this area had NO₂ levels above 40ug/m³ (the UK recommended level), and 2020 had 3, despite a lock down for most of the year. Focus Area 161 is around Chalkers Corner and has been identified as being an area of high pollution and human exposure before development begins, and the resident forecast population increase of 2,472. In addition, a key focus of the LBRuT Air Quality Team, is ensuring low levels of pollution near schools. The site proposal includes a secondary school close to the main road running past the site, with no mitigation as to how levels of pollution will be controlled in this area. The claim that the likely residual effect is 'insignificant' during construction and after the build and no mitigation is required in chapter 21, is

based on the assumption in chapter 10, that Air Quality will improve anyway over time, due to an increase in electric vehicles. This is inadequate given the scale of the development, current transport issues and the siting of a school on the site.

Relevant Policies

Policy	Description
National Planning Framework 2021	186. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
London Plan 2021 Policy SI 1 Improving air quality	A Development Plans, through relevant strategic, site-specific and areabased policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality. B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed: 1) Development proposals should not: a) lead to further deterioration of existing poor air quality
Richmond Local Plan 2018	LP 44 The Council's aim is to minimise the impacts of development, including in relation to congestion and air pollution. Transport has a significant impact on air quality in the borough, with many areas experiencing levels of pollution above national set target levels. Consequently the entire borough is designated an Air Quality Management Area. This policy, together with the policy on Parking Standards and Servicing, support the achievement of the Air Quality Management Objectives SA 24 The site is very close to an Air Quality Focus Area. Therefore strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as pupils at the secondary school
LBRuT Mortlake Development Plan 2011	5.35 A Transport Assessment will be necessary to consider the impact of vehicular traffic within and around the site as a whole. Development proposals will need to take into account impact on traffic congestion and air quality, impact on the historic environment and impact on local residents
LBRuT Air Quality Action Plan 2019-2024	New buildings and development.

We have embedded air quality in our Local Plan and will produce a Supplementary Planning Document that will help to deliver our aspirations for cleaner air in the borough. This document will cover all areas of planning and ensure developers focus on air quality throughout the build and for the life of the development
As a local authority we need to ensure that we are continually assessing the impact on this vulnerable group and taking steps to minimise the effects of air pollution in our schools and during travel to and from school
Focus Area 161 – one of four focus locations that have been identified as having high levels of pollution and human exposure – Chalkers Corner/Clifford Ave/URR Mortlake Green

Commented [AF3]: Not sure what this refers to.

Appendix I

Compare School Performance (Gov.UK)										
	Watney Road	Distance	Rating	Borough	Sponsor	2021/22	Total Capacity	Surplus/ Defecit	Additional Proposed	In Year 7 (age 11)
1	Thomson House School								600	120
2	Richmond Park Academy	0.7	Good	Richmond	AET	924	1100	176	150	30
3	Christ's	1.0	Good	Richmond		927	930	3		
4	Chiswick*	1.0	Good	Hounslow	Single Academy Trust	1274	1500	226	150	30
5	Brentford school for girls	1.8	Good	Hounslow	Single Academy Trust	884	949	65		
6	West London Free School	2.2	Good	Hammersmith & Fulham	Knowledge Schools Trsut	881	890	9		
7	Green school for boys (CofE)	2.3	Good	Hounslow	The Green school Trust	495	1260	765		
8	Ark Putney	2.3	Good	Wandsworth	Ark Schools	859	1200	341		
9	The Green school for girls (cofE)	2.3	Outstanding	Hounslow	The Green school Trust	938	940	2		
10	Gunnersbury Catholic	2.4	Outstanding	Hounslow	VA school	1234	1228	-6		
11	Orleans Park	2.5	Outstanding	Richmond	Single Academy Trust	1342	1260	-82		
12	Gumley House	2.5	Outstanding	Hounslow	Single Academy Trust	1079	1220	141		
13	Ark Acton	2.5	n/a	Ealing	Ark Schools	995	1400	405		
14	Fulham Cross	2.6	Good	Hammersmith & Fulham	Fulham Cross Academy Trust	414	720	306		
15	Ealing Fields	2.6	Good	Ealing	CofE Academies Trust	643	840	197		
16	Fulham Cross girls	2.7	Outstanding	Hammersmith & Fulham	Fulham Cross Academy Trust	619	634	15		
17	Ark Soane	2.7	n/a	Ealing	Ark Schools	New	1200	1200		
18	Grey court	2.7	Outstanding	Richmond	Every Child, Every Day Trust	1493	1398	-95		
	Total					15,001		3,668	900	180
	Richmond schools shaded in yellow									
	*Chiswick 22/23 has capacity of 1500, 21/22 capacity of 1300									

<https://www.compare-school-performance.service.gov.uk/find-a-school-in-england?searchtype=search-by-location&keywords=14%20Watney%20Road%2C%20Mortlake%2C%20London%2C%20SW14%207RA%2C%20London&page=1&LocationCoordinates=51.46913%2C-0.27267&schooltype=1,2&radius=3&schoollevel=IsSecondary>

Appendix II

Average mean No2

Red shading indicates levels above UK recommended of No2 40ug/m3

	2019*	2020**
Site 74 (previously 21) (Lower Richmond Road)	52	43
Site 18 (Lower Mortlake Road)	46	41
Site 55 (Mortlake Road)	40	33
Site 70 (STAG Brewery)	42	33
Site 51 (Sheen Lane)	30	24
Site 52 (Clifford Ave)	55	46

* Pre Hammersmith Bridge closure

** During Covid Lockdown

Chapter 10 Environmental Statement, Chapter 10, LBRuT Quality Annual Status Report for 2020

[air_quality_action_plan_2020- to 2025.pdf \(richmond.gov.uk\)](#)