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Reference number

Former Stag Brewery
Applications 22/0900/OUT and 22/0902/FUL

I am a member of the Mortlake and East Sheen Society and fully support their comments submitted regarding the Applications.

I have comments additional to those of MESS.

I object to the Proposed Project.

Distilling the overwhelming array of 700 documents submitted to Richmond Planning, the essence of the project is to bring to Mortlake a dense, overbearing commercial housing project with echoes of the disasters at Vauxhall and Wandsworth. As the Mayor of London said in turning down the application in 2020, "Until my visit to the brewery site, I had not understood what is the 'Arcadian Thames'".

The developers in presenting their plans have sought to present the project as "restoring the Heart of Mortlake". This is developers 'spin' and ignores that the Heart exists already. The heart of Mortlake is its people, present and past, historic buildings, alleys, streets, history, its working history shaped by the brewery (much of the housing was built for the brewery workers) and its relationship to the Thames. The addition of 1,085 housing units with only 213 units (22%) allocated for affordable housing, shops and offices would weaken this heart. The plans do not reflect Mortlake – for example the spaces and streets of the project use Project planner's chosen names – 'Plaza' is alien to Mortlake.

Despite the mass of some 700 pages the Project planners ignore or gloss over evident concerns:

The addition of traffic to the already congested roads which will be exacerbated by other housing projects nearby – Sainsbury's, Manor Road and Kew Retail Park sites.

Placing a large school next to a polluting road without reference to the historic court judgement in 2020 which found that South Circular Road traffic pollution contributed to the death of an asthmatic eight-year-old girl.

The intractable issue of the hazards of Mortlake level-crossing – already dangerous for school users and parents. The project traffic plan attempts no solution.

The lack of planning for medical and social care – no facility on the site and suggesting, without presentation of a case, that the occupants of the 1,250 should use the existing overstretched GP practices. And what about those coming to the other projects mentioned above?

Cycling routes are planned for the Project but no reference is made to the lack of a route heading west from the school along the Lower Richmond Road. It can be imagined that many pupils would head this way towards North Sheen, Richmond or Kew. The road is dangerous

for cyclists and this issue should be resolved. No data exists yet on the areas from which where pupils would be drawn.

The lessons of the Covid-19 pandemic are not incorporated directly in the Project planning though the Impact Statement framework appears to draw on aspects of Covid-19 experience.

The lack of reference to Mortlake Green though clearly the Project Planners have some intent on the use of the Green as shown by the submitted drawing High Street Zone (document 3592981) and the placement of the green

The loss of the Watney Sports Field is regrettable.

Peter Wilkinson

1 Cross cutting issues

1.1 Health planning - No lessons have been applied from the Covid-19 pandemic.

The plans by the developers for the site are essentially unchanged in fundamentals since they were first submitted planning permission. The Health Impact Statement of March 2022 makes no reference to Covid-19, its lessons and how they should be applied. The lessons should be shaping the project inter alia in respect of:

- Public and open spaces
- Space on footpaths
- Provision for bicycle routes
- Fitness and sport provision
- Open space
- Office and housing design
- Work patterns
- School design
- Pollution prevention
- Community services

“The loss of lives and the economic downturn caused by the Covid-19 pandemic should be turned into an opportunity to radically rethink how we live and plan our cities and communities.”

Urban Planning after Covid-19: supporting a global sustainable recovery, 2021
Royal Town Planning Institute, 2021

There needs to be planning for:

- Provision of enhanced open spaces for public when locked-down
- New and extended bicycle lanes
- Space in planning positions of buildings, commercial and residential
- Space for using railway level-crossings - social distancing could not be maintained easily using the current level-crossing or station stairs
- Space on footpaths e.g. the pavements in the Lower Richmond Road - currently the paths for school children to the school, are only 2m wide
- Health and social care service units: no provision in the Project plan
- a school transport plan
- Revised business cases for the hotel and the cinema
- Revised business case for offices and retail space
- Density and design of the housing units to provide space

2 Stag Brewery Proposed Project application 22/0900/OUT

2.1 Inadequate healthcare provision

The Proposed Project does not provide for a healthcare facility and would place undue pressure on the already stretched existing GP services in the area. It states in the Health Impact Assessment¹ that there would be increased pressure on local health services within 1 km of the site. The report does not allow for the pressures from new significant housing investments– two projects in Manor Road (1.5 km) and one in the Kew Retail Park (2 km).

London Plan 2021, section 1.3.2 prioritising health
Delivering Good Growth will involve prioritising health in all of London's planning decisions, including through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of development proposals on health and health inequality.

The report opines that there is some existing capacity in existing GP services and any additional residents from the Stag Brewery project would still fall below a London Healthy Urban Development Unit (HUDU) benchmark of 1,800.

2.2 Affordable housing reduced

The levels of affordable housing in the revised Application have been reduced substantially. The September 2020 Application provided for 30% affordable housing whereas the current application reduces the affordable housing to 22%.

Definition of affordable Housing
"Social rented, affordable rented and intermediate housing (see para 3.61), provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision."
London Assembly, Policy 3.10
<https://www.london.gov.uk/programmes-strategies/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2016/london-plan-chapter->

¹ Health Impact Report, document 3460214, page 11)

2.3 Mortlake Green should not be included in the project's assumptions

In the Project's 2020 Summer Newsletter, an artist's depiction showed changes to Mortlake Green



It seems that the Proposed Project is still relying on some change in Mortlake Green – there are red dashes indicated in the drawing of the High Street Zone (document 3592981) on Mortlake Green to the south of the green corridor. Possibly this is to indicate a concept of a view along the green corridor or a public way to be established. Mortlake Green was given to the residents of Mortlake by Earl Spencer in 1860 as a recreation ground and is managed by LBRUT Parks and Open Spaces. It should be made clear to the planners for the Proposed Project that they cannot make assumptions that the community would agree to changes to Mortlake Green.

2.4 Naming of ways and spaces

The community should be involved in choosing names for the ways and spaces in the new layout. Terms should be appropriate to the history of the area and not names such as 'plaza' as are indicated at present.

2.5 Hotel site not the best

Despite the site's historic use many years ago as a hotel the siting of the hotel should be reconsidered. It is located on a very busy road junction.

3 Secondary School Application 22/0902/FUL

3.1 The project plan gives inadequate attention to the increased risks at Mortlake level-crossing

The School Travel Plan document 3460235 does not recognise the severity of the risk at the Mortlake Level Crossing and accordingly does not provide for adequate mitigation

Planning permission should be withheld until there is a satisfactory analysis of risk and a mitigation plan prepared.



Image: Hamilton-Baillie Associates

The crossing is high risk now². The complexity of providing solutions was shown by a Network Rail study in 2017.³ The risks would increase once the secondary school is operating. Yet, the School Travel Plan for the Proposed Project glosses over the risks.

The crossing is risky now because:

A high number of pedestrians and cyclists cross at key times during school travel times

The pedestrian paths across the railway lines are narrow and are separated from traffic by only a marked line.

Thomson House School is situated next to the crossing and also has a school building in nearby Vernon Road with movement frequently of pupils across the line and footbridge in the class day and then movements from parents taking children to and from the school buildings

Frequent trains cause the gates to be down and thereby exacerbate the crowding for those using the crossing.

People and children face risks crossing the road – heavy traffic and often speeding to avoid the crossing gates descending

There are no pedestrian crossings by the level-crossing gates, the nearest is 100 metres north of the gates and beyond Thomson House school.

² The crossing was identified in 2020 by The ABC Railway Guide as having a Collective risk of 2, Very High - this is the overall risk of any incident involving any person or vehicle on the crossing, including train staff and passengers as well as users of the crossing.

³ In 2019, Network Rail discussed solutions to the risks at the level crossing: "It is the recommendation of this assessment, with an impending development looming that closure with diversion or, via a road Rail Bridge remains the best option. However, whether this is achievable remains to be seen and will requisite complex modelling, feasibility studies, in depth census analysis as well as collaboration with Richmond authorities and possible developers."

Mortlake Level Crossing Risk Assessment, Network Rail, 2017
www.mbcg.org.uk/wp-content/uploads/2019/08/levelcross.pdf

What the application says:

School Travel Plan: 6.5 Crossing the Railway Line

6.5.1 It is recognised that walking and cycling routes from the school across the railway line need to be carefully managed. The school will therefore liaise closely with both LBRuT and Network Rail to agree a suitable management regime to both minimise risks to children and any accompanying parents and to the wider public. Measures could include the following:

- Agreement on preferred routes;
- Potential presence of staff to monitor children's' behaviour at key locations; and
- An agreed educational programme.

6.5.2 These are proposed measures and when the school travel plan is taken over by the school there may need to be additions to these measures or adaptations to ensure they are both feasible and manageable. However, this travel plan recognises that there may be a need to be flexible in the approach and that there may be alternative or better options available to the school, although these measures have been suggested to recognise the importance of managing pupils crossing the railway

3.2 Planning needs to recognise the traffic pollution risk to the pupils and teachers of the school

The positioning criteria for the school buildings did not include a criterion for protection from traffic pollution. The school is planned to be next to a busy road and place pupils and teachers at risk from pollution

The significance of pollution risk was confirmed by a coroner's court in 2020 that found that dirty air made a material contribution to the death of an asthmatic 9-year-old girl in south London who lived by the South Circular Road. This was the first time a person in the UK had had air pollution listed as part of the cause of death.

3.3 Loss of potential open space on site of playing fields

Objection on grounds of Local, strategic, regional and national planning policies

The proposal: to replace grassed playing fields with a combination of a football sized 3G pitch, a smaller enclosed court for tennis and other sport and some space left for a small recreational area

The application is a concern for several reasons:

Loss of potential Open Space as covered in the draft Richmond Local Plan and defined in the GLA London Plan

The need for open space in the light of the Covid-19 lessons

Loss of amenity for residents

Adverse effect on wildlife

Adverse results of use of floodlighting and use of the pitches until early evening

To remove the area for public benefit would be a huge and unwise loss.

The planning application includes the replacement of the Stag Brewery grass playing fields with an all-weather surface, fenced in and floodlit. The case for the all-weather playing area is that it is needed for the secondary school. As identified by MESS the case for a new school is uncertain as current

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schools are said to have sufficient spaces and where the pupils would be drawn from has not been defined.

I am strongly opposed to this proposal for several important reasons, some of which have been identified by LBRUT and the GLA. The loss of the Stag Brewery playing fields is driven by the desire to build a secondary school that has ignored or over-ridden the changing needs of communities for open space

Open spaces are increasingly important for communities' well-being

Covid-19 Pandemic lesson: Open spaces played an important role in managing people's stresses and social interaction during the Covid-19 pandemic. This lesson applies equally well to the growing stresses of modern day life and growing economic and social issues. It would also apply in the event of another pandemic and the risk of global spread of diseases is growing. The current monkey pox outbreak is an illustration of how diseases travel.

'The loss of the Stag Brewery playing fields is driven by a desire to build a secondary school that has ignored or over-ridden the changing needs of communities for open space.'

The removal of the playing fields would contravene policies and undermine planning aspirations for open spaces. The Stag Brewery playing fields decision will be a test of the Richmond's and GLA's determination to embed new standards or in failing to protect the fields, show weakness of the intent. Here are some statements of planning aims or aspirations.

Richmond Local Plan⁴, Draft for consultation

Policy 36. Other Open Land of Townscape Importance: OOLTI should be predominantly open or natural in character – criteria should include value to local people for its presence and openness (21.24)

Policy 37: The Council will require all major development proposals in the borough to meet the Public Open Space, play space, and playing fields and ancillary sport facilities needs arising out of the development by requiring the following:

Draft Regulation 37 is particularly relevant to the Stag Brewery application

A. Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged.

B. New open spaces, play facilities and formal and informal land for sport and recreation should be linked to the wider green infrastructure network as they play an important role in creating social cohesion, encouraging and promoting healthier and more active lifestyles. In addition, green open spaces are especially important for biodiversity and the improvement of wildlife or ecological corridors as well as contribute in reducing the likely effects of climate change. Furthermore, the provision of new open spaces and actively encouraging new users and visitors to utilise these spaces will alleviate recreational pressures on sites designated for biodiversity.

⁴ Richmond Local Plan 'The best for our borough', Draft for consultation, 10 December 2021

C. The Council will require all major development proposals in the borough to meet the Public Open Space, play space, and playing fields and ancillary sport facilities needs arising out of the development by requiring [a number of criteria are set out]

The application does not meet GLA Policy on open spaces

The policy is clear. The London Plan states:

“Policy 7.18: The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area.”

An enclosed all-weather area is not an open space. The application plan includes provision for a small area of open space retained within the area of the former brewery laying fields but this does compensate for the loss of amenity both visual and physical and for wild life of the playing fields.

“As Mayor, I want London to lead the way in tackling the climate emergency and for all Londoners to be have access to great green spaces close to where they live”

The Mayor of London, Sadiq Khan, 30 June 2021¹

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Complacent: The developer's survey found traffic risks to be insignificant
"The residual effects for severance, pedestrian delay, pedestrian and cycle amenity, fear and Intimidation, and accident and road safety are considered to be insignificant."
Stag Brewery, Mortlake, Transport and Access EIA Report, 2018, by consultants to the developer, "an assessment of the likely significant effects of the Development on the existing transport and access conditions within the area local to the Site and the wider surrounding area".