

55 Temple Sheen Road,
East Sheen,
London SW14 7QF

4 January 2023

Head of Development Management,
London Borough of Richmond upon Thames
Email: envprotection@richmond.gov.uk

Dear Sirs,

Re: Former Stag Brewery Site, Lower Richmond Road, Mortlake, London SW14 7ET – Planning Applications 22/0900/OUT (Application A) and 22/0902/FUL (Application B)

I wish to confirm my objection to Application A - 22/0900/OUT and Application B 22/0902/FUL in relation to the redevelopment of the Stag Brewery site, Mortlake.

The latest set of consultations appear to be primarily necessary due to 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.

However, the proposals and latest changes still do not address any of the earlier significant failings of the applications. These are summarised as follows: -

***Applications A and B
Density, Building Height & Scale of Development***

- The scheme now proposes 1071 residential units, a minor reduction of 14 from the March 2022 submission, and thus 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.
- 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 of 28 February 2022).
- 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.
- 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.
- 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.

- Building 10 has been reduced in height by one floor which is welcomed, although it does reduce the number of Intermediate-Affordable residential units.

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 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 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. The figures still do not seem to stack up.
- The affordable units are concentrated largely in one area in the west of the site which hardly promotes a truly integrated community.

Infrastructure, Highways, Access and Air Quality

- Traffic generation and congestion remain as major concerns and 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 extremely poor air quality.
- Local residents are experiencing huge delays in travelling out of the area by car due to already increased congestion throughout the day, and equivalent delays on returning into Mortlake.
- Development of the Homebase site, the Barnes Hospital site, and future redevelopment of the Kew Retail Park will make local conditions unsustainable.
- Hammersmith Bridge remains closed to traffic with no prospect of it being fully reopened for vehicular traffic and bus services for many years.
- Local bus and train services have also been reduced and although Section 106 Agreement funds are allocated for improved local bus services, TfL have confirmed there are no definitive plans for any such improvements.
- How Stantec can justifiably substantiate their proposed upgrading of the PTAL accessibility of the site given the above is implausible. (*Please refer to Technical Note - Bespoke PTAL Calculation Summary – 1 July 2022*).
- The proposed location of the bus stops and pedestrian crossings on the Lower Richmond Road and Mortlake High Street, together with the Mortlake Station level crossing, will create unbearable constraints to traffic movement especially at morning peak times with the concentrated arrival of 1250 school pupils/staff and other site generated traffic/deliveries.
- The additional congestion and stationary traffic will be a major contribution to exacerbating the existing extremely poor air quality.

- The scheme will very significantly increase the local population by around 2500 residents and yet there is little or no provision for any 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 - 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.
- 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 reasons alone both inter-linked applications should be refused.

Yours faithfully,

C.W.J. Cornfield