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Environment Directorate / Development Management London Borough of Richmond upon Thames Civic Centre 44 York Street Twickenham TW1 3BZ

Sent by email to: stagbreweryredevelopment@richmondandwandsworth.gov.uk

3 December 2023

Dear Sirs.

CONSULTATIONS Application 22/0900/OUT FORMER STAG BREWERY

I am responding to the latest changes to the proposals for the Former Stag Brewery site as part of the formal consultations period. I note that changes have been made to the scheme designs in relation to the Application 'A' - 22/0900/OUT for the whole site, and that there are no changes to Application B for the school as this is unaffected by the changes to fire escape requirements.

I object strongly to this application and the latest design changes. My main comments are as follows.

- I see that nine of the buildings have been affected by the new fire escape regulations for buildings over 18m in height. The design amendments still conflict with the Local Plan and the approved Planning Brief for the site with several buildings above the height limit of 7 floors, and do not diminish sufficiently in height below this maximum limit to the edges of the site. In fact most of the buildings located on the towpath perimeter are over 7 storeys in height.
- 2 It appears that the number of units is now reduced to 1075 (previously 1085), due to internal design changes to many of the buildings. This is despite replacing office space above the cinema with new residential units. However, the percentage of affordable units is woeful, and considerably below the levels required by the London Plan and the Local Plan and now considerably lower than the percentage rejected by the Mayor of London on the earlier planning application.
  - This area certainly needs more affordable homes. General house prices mean living here is beyond the reach of the vast majority of young people and of many people who support the local community by working in areas such as health and social care, education and hospitality. If the development were given over substantially to housing in which such people could live I would be more supportive and accept some of the many problems of the scheme. In fact, the development will just add yet more expensive housing for wealthy people, many of whom will either have another home already or will live abroad and seeking a safe haven investment. That cannot justify the huge disruption, the increased pressure on already overwhelmed roads or the significant adverse environmental impact of the development.
- The layout and external areas of the scheme are amended but the open space provided between buildings would certainly be required in any case to comply with current residential design standards and codes. The open space between buildings cannot therefore be considered 're-

provisioning' required within the Local Plan to account for the loss of the sports fields (protected Open Space referred to as OOLTI) - due to the siting of the new secondary school in Application B.

In fact, I remain unclear why a new secondary school is needed at all. I am a school governor at a primary school in the area. We are very conscious of declining numbers on the roll, which will soon translate into reduced pupils at secondary level as well. Against that demographic backdrop, why build a new secondary at all? The fact that 'we can' because it is in effect paid for by the developers is no answer.

We note that consultations relate only to the recent amendments, given the consent of the wider scheme in July this year. However, none of the changes addresses these three fundamental non-compliant aspects of the London Plan, the Local Plan, and the approved Planning Brief for the Stag site.

There was much debate by committee members at the July Planning Committee about general scale, massing and context but these key issues of non-compliance were not specifically addressed by members. Other perceived public benefits of the proposals can in no way over-ride such weighty planning considerations and are highly unlikely to be over-looked at Inquiry.

I repeat that I object strongly to this application and the latest design changes. I still consider this a gross over-development of this highly constrained site which will make local conditions and traffic even more intolerable. I wish to see a more sustainable community led plan for this unique site.

Yours faithfully

**Darryl Evans**