



20 Fife Road
London SW14 7EL

18 March 2024

The Mayor of London
City Hall
The Queens Walk
London SE1 2AA

Dear Mr Khan

Former Stag Brewery, Mortlake

(A) 22/0900/OUT: housing/mixed use development

(B) 22/0902/FUL: secondary school and all-weather pitch

You may recall we wrote to you on 1 August last year objecting to the latest plans for the Brewery redevelopment (see letter attached). At the time we were unaware that L.B. Richmond Council had not yet forwarded its package to you due to its request for the plans to be amended in accordance with the latest post-Grenfell fire regulations. These amended plans were approved by the Council's Planning Committee on 31 January subject to your direction.

The package that the Council will have sent to you by now will hopefully have included our comments on the amended plans dated 13 December 2023, but not our presentation to the Council's Planning Committee meeting on 31 January where we queried a number of points made in the officer's report namely:

Height, scale and massing

You will recall you refused the previous scheme in July 2021 on these grounds. The officer's report argues that 'storey heights have similarities with the 2018 scheme, where no objection to height was raised.' After call-in they were increased to max 9 storeys in order to achieve a greater percentage of affordable housing and you rightly refused this increase in height because it was contrary to London Plan policies D3 and D9. We are of the view that storey heights in the current scheme have more similarities with the scheme you refused as it still includes one 9-storey and several 8-storey buildings. The 7-storey limit has been endorsed in the Council's recent Urban Design study (by Arup) and in its current Publication Local Plan as shown in the visual attached to our presentation to the Council's Planning Committee on 31 January.

The officer's report also admits that some of the taller buildings are buffered by lower perimeter buildings or set among buildings of comparable height. But the latter exacerbates the problem. The exposed, toothlike row of tall river frontage buildings dominate the river and its setting contrary to the London Plan policy D9.

Impact on heritage

You will likewise recall you refused the previous scheme on these grounds. The officer's report acknowledges that the scheme continues to cause harm to the character and setting of the Conservation Area and heritage assets, and have an adverse effect on views from Chiswick Bridge and the towpath. In our view the Maltings building loses its significance due to the adjacent taller buildings, this being contrary to the London Plan policies HC1 and D9.

Density

You did not refuse the previous scheme on the grounds of density because you have replaced the density matrix with the design-led approach. And yet the word density still features in the London Plan policy D2 (Infrastructure requirements for sustainable densities). In our view the density of this development is not sustainable. The officer's report includes a table showing the proposed density as 527 hab rooms per hectare which is significantly over the max. level of 450 hab rooms per hectare recommended for urban development in the GLA's erstwhile density matrix. This has resulted in tall, closely packed buildings which cause overshadowing much of the year and impact adversely on the open spaces.

We note that the officer's report makes reference to para 130 of the latest NPPF which states: 'significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area'. We strongly believe this to be the case here and that the harms continue to outweigh the benefits, contravening Planning policy.

Other issues

[In addition to our comments presented at the Council's Planning Committee meeting on 31 January we supported the comments made by the other two other speakers on the subject of affordable housing and the secondary school.](#)

Affordable housing

[The percentage affordable has dropped from 15% in 2022 to just 7% \(habitable rooms\) today. We understand that the affordable units may even be off-site which alarms us as it will result in our local workforce having to commute from much further away. This is not sustainable.](#)

The Secondary School

You will recall refusing the secondary school in Application B on the grounds that it was intrinsically linked to the development in Application A. The school remains unchanged since you refused it. In our view the school has been the main cause of all the problems associated with this development for the following reasons:

- The size of the school – 6-form entry plus 6th form accommodating up to 1,250 students – is too large for a site that is too small and it has encroached onto the land for housing with resultant increase in the height and density of the housing.
- The traffic generated by the school (vehicular, cycling and pedestrian) will impose a considerable strain in the morning peak on the congested Lower Richmond Road, the Sheen Lane level crossing at Mortlake Station and the riverside towpath, the proposed mitigation being seriously inadequate.
- The school's all-weather pitch with its fencing and floodlights will displace the existing grass playing fields which are a designated Other Open Land of Townscape Importance (OOLTI).

The Council proposes to re-provision the OOLTI elsewhere on the site partly as a green link from Mortlake Green to the riverside (commendable), partly as a small local park alongside the congested Lower Richmond Road (not ideal) and partly as courtyards in the housing development (overshadowed and likely to become privatised). These fragmented spaces do not meet the criteria of quantum, quality and openness and the courtyards should not be included as part of the re-provisioning in any case as they form part of the open space requirement for the housing.

- If there was a primary school on the site, as indicated in the original brief, there would be more room for the housing, some of which could be accommodated above the school, and a significant increase in the percentage of affordable housing – the applicant has admitted this. As it so happens, there is a primary school waiting to occupy the site which is currently located in two buildings on either side of the Sheen Lane level crossing (the second most dangerous crossing in the South of England) and is using the existing playing fields within the OOLTI which will very likely be denied to them if a new secondary school were to emerge on the site.

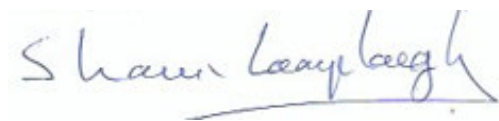
The Flood risk

The only other point we would add since we last wrote to you on 1 August is to mention there has been increasing concern about the flood-risk whereby the proposed defences on this site could make the existing defences between the site and Barnes Bridge more vulnerable. We feel this needs more scrutiny.

Conclusion

We would like to mention that our Society is not alone in this regard. We have been collaborating with the Mortlake Brewery Community Group, the Mortlake Community Association, the Kew Society and the Barnes Community Association in respect of our views on these development proposals for the past six years. We remain of the view that we support the development prescribed in the Planning Brief for the site and the heights of buildings prescribed in the Council's Publication Local Plan (vis. 7 storeys with 5-6 storey buffers). We are opposed to the development plans now being referred to you and we accordingly urge you to direct refusal of both applications again.

With best regards,

A handwritten signature in blue ink that reads "Shaun Lamplough". The signature is written in a cursive style and is underlined with a single horizontal line.

Shaun Lamplough, Past Chair

Our presentation to the L.B. Richmond Planning Committee on 31 January 2024

My name is Patience Trevor and I speak for the Mortlake Brewery Community Group, the Mortlake with East Sheen Society and the Mortlake and Barnes Community Associations. I refer to the Officer's report and will focus on the amendments, the building heights and the density.

The Amendments

Para 4.7 notes that in Building 10 the 'floor to ceiling heights have changed slightly to bring height to below 18m.' This presumably avoids the cost of an additional staircase in a building above 18m. We are concerned on safety grounds and also on quality of space. The Design Code Addendum suggests a similar approach may be made to four buildings in Development Area 2 (Nos. 13, 14, 16 and 18).

Height, scale and massing

Para 8.56 notes 'storey heights have similarities with the 2018 scheme, where no objection to height was raised.' No objection was raised because heights in that scheme, of up to 7 storeys, conformed with the Council's Planning Brief – a limit endorsed in its subsequent Urban Design Study, and embedded in policy in its Local Plan. The current scheme still includes 9- and 8-storey buildings, more akin to the scheme the Mayor refused on grounds of height, scale and massing. Moreover, para 4.14 notes that while buildings 2 and 7 are reduced to 8 habitable storeys – to meet fire regulations – the profiles and massing remain unchanged.

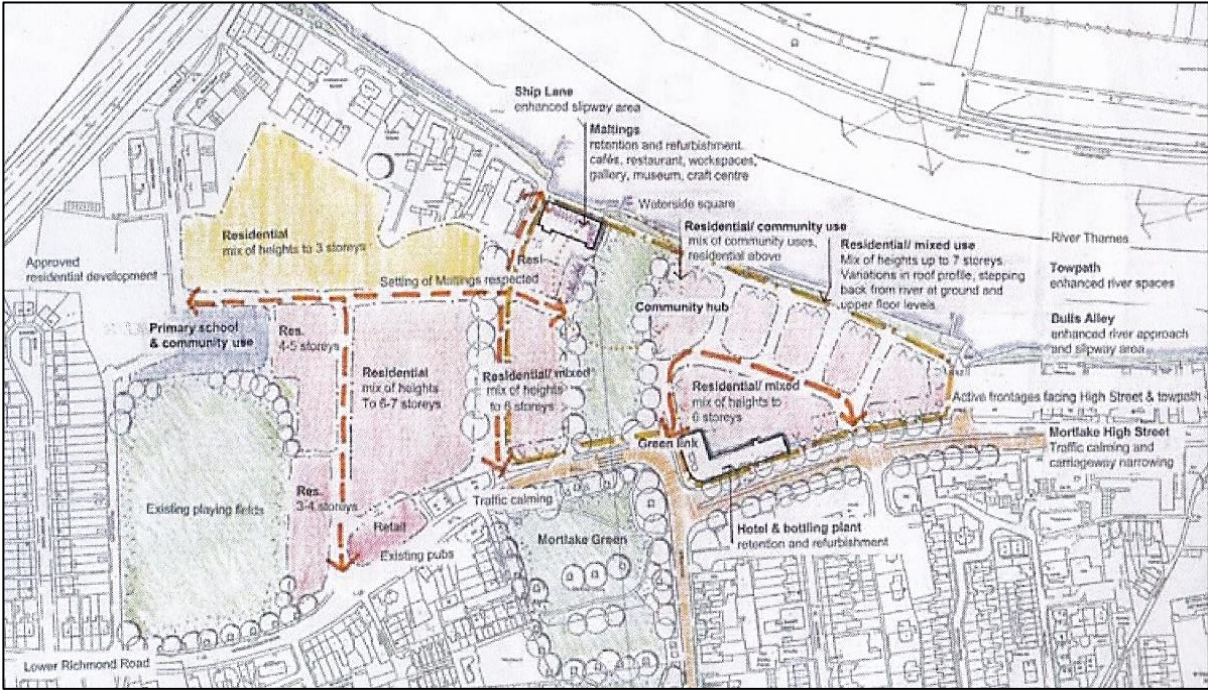
Para 8.56 admits that some buildings exceed the Brief, the Urban Design Study and the Local Plan, but are buffered by lower perimeter buildings or set among buildings of comparable height. But the latter exacerbates the problem. The exposed, toothlike row of tall river frontage buildings dominate the river and its setting.

The report also acknowledges that the scheme continues to cause harm to the character and setting of the Conservation Area and heritage assets, and have an adverse effect on views [2, 3, and 4] from Chiswick Bridge and the towpath.

The Density

The proposed density, now 527 hab rooms per hectare, is significantly over the max. level of 450 hab rooms per hectare recommended for urban development in Table 14 of the report. The high density results in tall, closely packed buildings which cause overshadowing much of the year and impact adversely on the open spaces.

The report claims that the proposed changes are not deemed to materially alter the conclusions reached in the July report. We disagree. Para 8.53 references the revised NPPF, particularly its new clause, para 130 which notes that 'significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area'. We strongly believe this to be the case here, that the harms continue to outweigh the benefits, contravening Planning policy.



The heights of buildings in the Planning Brief of 2011



27.27 Stag Brewery (Mortlake): Tall Building Zone

Appropriate height: 7 storeys (21m)

27.28 Stag Brewery (Mortlake): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

The heights of buildings in the Council's Publication Plan of 2023



56 Gilpin Avenue
London SW14 8QY

1 August 2023

The Mayor of London
City Hall

Dear Mr Khan

Former Stag Brewery, Mortlake

(C) 22/0900/OUT: housing/mixed use development

(D) 22/0902/FUL: secondary school and all-weather pitch

You will no doubt remember calling in the two previous planning applications for the Brewery site in July 2021 and refusing them. You may by now have heard that L.B. Richmond Council on 19 July 2023 approved the two subsequent planning applications and will now be referring both to you because, as before, they include over 150 res units and are partly within the Thames Policy Area No. 1. You will also be receiving copies of all the representations made including those made by our Society, but please note that we made ours prior to us seeing your Stage 1 report.

Our Society has over 400 members, all of whom have been kept informed and almost all are opposed to both applications. Our committee of 12 are unanimously against Application A and almost unanimously against Application B (just one dissenter). We urge you to direct refusal and we have four points to make as follows:

1. Harm to heritage assets

You will recall previously refusing the housing/mixed use development because of its height/massing and its impact on heritage and amenity. We note that your recent Stage 1 report indicates: "Whilst the massing has been revised the application conflicts with London Plan policies on heritage, and the heights exceed the Council's Planning Brief SPD. Harm to heritage assets must be clearly and convincingly outweighed by public benefits associated with the proposal." The GLA should be aware that the heights of buildings also exceed those presented in the Council's Urban Design Study of 2023 (by Arup). Like the Council's Planning Brief SPD this shows development of up to 7 storeys including a 5-6 storey buffer zone on the riverside.

We note that the London Plan Policy D9 states inter alia that: "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, and not contribute to a canyon effect along the river."

You will recall refusing the previous scheme because of its height and impact on the arcadian setting. The previous scheme had blocks of predominantly 9 storeys fronting the river; the current scheme has blocks of predominantly 8 storeys – plus one 9-storey – doing the same and there is no buffer zone of 5-6 storeys on the riverside to mitigate the overshadowing of the river.

2. The public benefits

The Council Officer's report on the Brewery redevelopment indicates the so-called public benefits as including inter alia:

- The provision of affordable housing – BUT this has decreased from 30% (hab. rooms) in the previous scheme which you refused to a mere 7.6% (hab. rooms). We urge the GLA to scrutinize the applicant's Viability Report in this regard.
- The replacement of the 2.1 ha grass playing fields with a secondary school and all-weather sports pitch – BUT the grass playing fields are designated by the Council as 'Other Open Land of Townscape Importance' (OOLTI) having previously been part of Thomas Cromwell's domain (the surviving Grade II listed gates to Cromwell House being at the northern end of this space). They are currently used by local schools and clubs for football and by the local community for its annual Mortlake Fair. It should be noted that, without the secondary school, the applicant has indicated there would be more land available for housing including a significant increase in the affordable component.
- The re-provisioning of the 2.1 ha OOLTI to provide an open space corridor from Mortlake Green to the riverside – this is commendable – BUT also pockets of public open space fragmented throughout the site, most of which will be overshadowed by the surrounding apartment blocks. Residents of these blocks will surely campaign for these spaces to become private.
- A layout that gives priority to pedestrians and cyclists, providing safe alternative routes and connectivity – this is commendable – BUT we are concerned about the impact of the additional pedestrians and cyclists (both pupils and staff) at the Sheen Lane level crossing (see also under 4 below) and on the riverside towpath, the proposed mitigation being inadequate.

3. Infrastructure requirements for sustainable densities

The key issue which our Society and also the Barnes Community Association, Kew Society and Richmond Society feel has not been properly addressed to date is the transport infrastructure. We would like to draw your attention to Policy D2 (C) in your London Plan which states: "Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure." We have a serious problem of gridlock on Lower Richmond Road (see appended photos) which TfL seems to think can be solved by drivers switching to public transport, but many drivers are on an orbital journey, for which the public transport equivalent is highly inadequate.

In 2020 you called in the previous application for increasing the capacity of Chalkers Corner, which the Council had refused, and then you duly rejected it. This was followed by a proposal for a bus lane in Lower Richmond Road, which was not proceeded with, and now by a proposal for a slight widening at Chalkers Corner within highway limits, which we feel will merely bring more traffic into Lower Richmond Road thereby intensifying the gridlock. The collective view of all local societies is that "additional required infrastructure cannot be delivered" and that "the scale of the development should be reconsidered..."

4. The secondary school

Finally, you will recall refusing this school previously because it was intrinsically linked to the development proposed within Application A, particularly in terms of the re-provision of the OOLTI, transport mitigation, etc. We would like to mention that we are opposed to the secondary school for the following reasons:

- The Council's Planning Brief SPD originally included a primary school and retention of the grass playing fields. The primary school was urgently needed and was provided instead in two existing buildings on either side of the Sheen Lane level crossing next to Mortlake Station. The two buildings have no space for exercise, so they use the public space on Mortlake Green. Access to the Green is across Sheen Lane which is a dangerous road where traffic tends to speed up in order to reach the level crossing before the barriers come down

(they are sometimes down for over 12 minutes). The level crossing is the second most dangerous in the South of England. Thus, we are in favour of this primary school relocating to the Brewery site where it was originally intended.

- The secondary school will require the existing grass playing fields to be all-weathered and equipped with unsightly fencing and floodlights (the primary school would have allowed retention of the grass playing fields).
- The secondary school will threaten the viability of the 6th forms in the existing secondary schools in the area.
- The need for the secondary school is questionable. The baby boom of 2008-12 is currently causing capacity problems in the existing secondary schools in the eastern part of the Borough but, by the time that this school is built, these problems will have eased as the primary schools in our area now have empty classrooms. We are of the view that there is no urgency for the school to be built so soon.

We would be grateful if you could consider these points and we hope that you will direct refusal of both applications.

With best regards

A handwritten signature in black ink, appearing to read 'Tim Catchpole', with a long horizontal flourish extending to the right.

Tim Catchpole, Chair

Stag Brewery Development

Traffic Conditions in the Area

Photographic Survey of Sheen Lane and Lower Richmond Road (photos 1-13)

The photos of traffic gridlock from the Upper Richmond Road West/Sheen Lane junction to Chalkers Corner were taken on 18 May 2017 between 8.15 and 8.45am coinciding with an all-day video that was taken by a camera mounted on a pole at the Sheen Lane level crossing (see photos 3 and 4). This gridlock died down during the COVID years but has now returned. The photos taken of traffic gridlock in the reverse direction from Chalkers Corner were taken in May this year, this gridlock being caused by long waits at the Sheen Lane level crossing (sometimes up to 12 minutes) when the barriers are down.

Sheen Lane Level Crossing (photos 14 A-C)

Photos 14B and 14C showing pedestrian chaos at this crossing were taken at 8.30am in May 2018 when children and parents arrive at Thomson House Primary School.



Sheen Lane, Mortlake High Street and Lower Richmond Road



1. Queue off Upper Richmond Road into Sheen Lane approaching level crossing



2. Same queue towards crossing – traffic in Vernon Road has difficulty in joining



3. Level crossing with traffic queuing from Mortlake roundabout – note camera in front of Thomson House School (see below)



4. Chaos at Sheen Lane crossing seen from camera position in above photo – this will get worse when the secondary school becomes built



5. Traffic queue in Mortlake High Street with tailback to Barnes



6. Mortlake roundabout with queue into Lower Richmond Road approaching Chalker's Corner



7. Same queue in Lower Richmond Road approaching Chalkers Corner past the Brewery



8. Same queue approaching Chalker's Corner outside entrance to the Brewery – this will become the entrance to the school



9. Same queue approaching Chalker's Corner past Children's Centre



10. Same queue approaching Chalkers Corner – car having difficulty in joining queue from Watney Road



11. Same queue approaching Chalker's Corner past Chertsey Court



12. In reverse direction traffic queuing past Chertsey Court towards Sheen Lane level crossing



13. Same queue towards Sheen Lane level crossing past entrance to the Brewery – this will become the entrance to the school.



14. (A) Back to the Sheen Lane level crossing where accidents happen – and will continue to happen more often after the Brewery site is developed.



14 (B) Thomson House school children and parents with buggies at the Sheen level crossing at 8.30am with the barriers down. They either have to wait a long time at ground level or negotiate the awkward footbridge.



14 (C) With the barriers up – an accident waiting to happen and it will get worse when the secondary school becomes built.