

London Borough of Richmond upon Thames
 Development Management
 2nd Floor, Civic Centre - 44, York St
 Twickenham TW1 3BZ

MBCG 21.05.2022

Dear Sirs,

Former Stag Brewery Site - Application A Whole Site - 22/0900/OUT
Application B School - 22/0902/FUL

We write on behalf of the Mortlake Brewery Community Group in relation to these two new planning applications. We have closely followed the various design iterations for this site's redevelopment, constructively liaising with the developer and seeking to influencing the design evolution to meet the aspirations in the Planning Brief for this unique site. From the very outset we have tried to impress upon those concerned in the planning process that this site, although probably one of the largest sites to come forward for redevelopment in the borough for many years, is nevertheless fundamentally constrained by the river and the single primary access/egress. Even before any plans were tabled by the new owners the community made it clear that the scale of development would be constrained by its geographical location and sub-urban context. It is sad and disappointing therefore that it has taken so long in the planning process to still have the site's future in the balance, especially when the community is supportive of a mixed use regeneration, and when new homes, and particularly affordable homes are so badly needed. Taking a proactive approach we have tabled a Community Plan which takes account of the local issues and views of residents whilst also acknowledging the developer's objectives and site optimisation. Sadly the Council has never seriously explored this alternative approach. We are thus presented with a scheme which takes a middle-ground, somewhere between the original design presented to Richmond in 2020 and that refused by the Mayor last year.

The latest scheme for Application A has made a number of improvements from earlier design proposals and has responded to comments from our group, from other representations, and more recent Richmond's DRP recommendations. Sadly, however, we still have to raise objections to these two new inter-linked applications and outline the reasons briefly as follows:-

Application B Secondary School

- There is no justification for the need of the new secondary school of this scale and latest data, falling primary pupil numbers and ONS population predictions back this up.
- The school is located on OOLTI protected sports fields and even if deemed necessary is not on the main body of the former brewery site where there is adequate land for redevelopment.
- The school site area is just 30% of DfE guidelines for secondary schools of this scale. This is unacceptable for new educational facilities and is likely to be viewed as such by pupils and parents when compared to existing local schools.
- OOLTI re-provisioning is NOT achieved by the 9 pocket-sized open spaces in Application A and thus does NOT comply with current planning policy or the Planning Brief for the site. Two of these spaces are all hard surfaced and the Richmond DRP has stressed a need for less hard surfaced space and more soft green space.

Application A Whole Site

- Despite a 21% increase in residential units from the 2020 scheme the affordable housing provisions still do not comply with the London Plan or Local Plan policy.
- The proposals include some reductions in building heights which is welcomed, but some blocks still exceed the maximum height limits set out in the Planning Brief, Local Plan and Pre-Publication Local Plan
- Even if Hammersmith Bridge was operational for vehicular traffic again, the level of traffic generated by this scheme and the pedestrian movements across the primary roads to the site, will create totally unacceptable conditions locally in terms of additional congestion, safety and air quality. Mitigation proposed will not address these circumstances. We urge the Planning Committee Members to visit site at the am peak to see prevailing conditions for themselves.

For these reasons alone both inter-linked applications should be refused.

For and on behalf of MBCG . Joint Chair - Francine Bates & Peter Eaton