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5 January 2023

**Dear Sirs**

**Planning Application 22/0900/OUT**  
**Planning Application 22/0902/FUL**

I wish to register my very strong objection to the above two named planning applications, each related to the redevelopment of the Stag Brewery site, Mortlake.

I understand that this latest set of consultations are primarily necessary because of 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

These proposals and, in particular, the latest changes do not address, however, any of the continuing **significant** failings of the applications. I refer to those now.

### **Both Applications**

#### **1. Density, Building Height & Scale of Development**

The scheme now proposes 1071 residential units, a minor reduction of 14 from the March 2022 submission. It 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. In particular:

- 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 28.02.22).
- Many of the residential blocks still exceed 7 floors in height. They consequently overwhelm the character of the Thames bankside setting and 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.

- Those buildings above seven floors contravene not only 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.
- The reduction in height of Building 10 by one floor is welcome, although seemingly in doing so it reduces the number of Intermediate-Affordable residential units. This appears to symbolize that a central aim of this development is to maximise profit, not to provide the amenities which the community actually needs.

## **2. 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 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 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. I doubt it is being overly skeptical to suggest that eventually the proportion of affordable housing units will fall even further.

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. It seems incredible that a developer could not produce a profitable proposal even with the inclusion of a substantial amount of affordable housing. If they can't, maybe they are the wrong developer, or are simply being too greedy for a large profit.

Stepping back, though, is it really the Council's policy to support a large housing development comprising premium and expensive units which will be affordable only to wealthy people (and which, I suspect, will be London pieds-a-terre for many). I have two children in their 20s who are in the early stages of their careers and would love to be able to purchase their first homes in this area. Tell me I am wrong, but I suspect that these units will be way out of their affordability range, as they will be for essential local workers (teachers, health care workers, shop workers etc). I appreciate that there is a national housing shortfall and that increasing the stock of housing across the country should in principle reduce prices for all buyers, but is the Council really of the view that a development of this kind contributes to that? In other words, does the Council genuinely take the view that this area either in its own interests or for the benefit of the wider community really needs this housing?

One final point on affordable housing: the affordable units are concentrated largely in one area in the west of the site which hardly promotes a truly integrated community.

## **3. Infrastructure, Highways & Access**

Traffic generation and congestion remain massive concerns and serious 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 poor air quality.

Local residents are experiencing huge delays in travelling out of the area by car due to ever-increasing congestion throughout the day, and equivalent delays on returning into Mortlake. My wife commutes from

