



56 Gilpin Avenue  
London SW14 8QY

13 December 2023

Mr Robert Angus  
Head of Development Management  
LB Richmond upon Thames

Dear Sir

Former Stag Brewery, Lower Richmond Road, Mortlake, London SW14 7ET  
22/0900: Demolition of existing buildings, detailed application for redevelopment on east side,  
outline application on west side

We refer to your letter of 20 November 2023 advising us of the latest amendments to the above application. Our comments on the amendments are given below. However, we take exception to your request that we focus on the amendments only. We were very disappointed by the conclusion reached by your Committee that the benefits outweigh the harms and that hence planning permission should be granted. We were not allowed to speak while the Committee deliberated, we are doing so now and we will be doing so again when this application gets referred to the Mayor of London for direction. Thus, our comments on the harms and benefits are also given below.

The amendments

We have three comments as follows:

1. We note that nine of the buildings proposed on the site are over 18m high and hence require additional staircases. We also note that there has been no change to the footprints and as a result we have calculated that, in order for the additional staircases to be accommodated, the average habitable room size in these 9 blocks has decreased from 28 sq m to 26.8 sq m. We will leave you to decide whether this is acceptable.
2. We note the proposal to change the use of three floors of the cinema block from offices to residential resulting in a decrease of overall office space from 4,468 sq m to 1,987 sq m. This is a substantial decrease. The Planning Brief for the Brewery site does not give a floor area as such but states: "Demand for offices has historically been strong... generally for small and serviced accommodation and from businesses of 10-20 employees. The Council would support office development as part of a mix of employment uses. This will need to be specifically targeted to ensure that it meets an identified need and is viable." We have not seen any evidence of the applicants having made efforts to target specific businesses. We would rather see these floors retained for office use as the office workforce would bring life into this development and contribute to the local economy.
3. We note that the photomontages have been updated to show the cinema block in residential use instead of offices but we also note that the finalised Landscape Masterplan does not align with the photomontages in certain places. For example, it shows trees retained on the north side of Mortlake Green whereas the montage of the Green Link to the river shows no trees standing in the way. Also many of the montages show the Lower Richmond Road as accommodating hardly any traffic whereas it is a heavily trafficked class A

road. As a result the Green Link will need a health and safety check and the montage may need to show guardrails.

#### The harms in the approved scheme

##### Application A: Housing and new community hub

The harms are as listed on Page 360 of the officer's report:

1. The heights of several buildings exceeding those in the Planning Brief and in the Draft Local Plan. The report mentions "less than substantial harm" to the settings of the listed buildings. We agree with this – the maximum height shown in both the Planning Brief and in the Draft Local Plan is 7 storeys and the proposed development includes one block of 9 storeys, two of 8 storeys with 9<sup>th</sup> floor turrets and three other 8-storey blocks. But the impact on the settings of listed buildings is not the only issue associated with height. There is also the overshadowing of the river and towpath and there is the issue of density. There is no consideration given here to the traffic – vehicular and pedestrian – generated by such a high density development, nor to the inadequacy of the existing public transport infrastructure. The proposed high density development is at a scale akin to Central London where the Public Transport Accessibility Level (PTAL) is the maximum 6 points whereas the current PTAL here is just 2 points. The proposed development should either be scaled down to meet its current PTAL or the scale can be adjusted upwards by Mortlake Station returning to its pre-COVID 4-trains-per-hour typical all-day cycle and by the bus network growing further.
2. We agree with the other harms identified, namely some units on-site being substandard in terms of light and outlook, some neighbouring properties off-site being affected adversely by loss of light, and many residents in the wider area being affected by disruption during construction.

##### Application B: Secondary school and all-weather pitch

The harms are as listed on Page 363 of the officer's report:

1. Significantly substandard in terms of its soft and hard outdoor PE and soft informal space and...
2. Substandard also in terms of the Urban Greening Factor, Green Roof target and Biodiversity Net Gain. We are not surprised. The Council's Planning Brief had originally indicated a primary school for about 400 pupils on this site which would have utilised the existing grass playing fields. Following the development of Thomson House Primary School on two sites nearby, the Council has chosen this site instead for a secondary school for 1,250 pupils utilising more or less the same land allocated for the primary. This is bad planning and will be a major embarrassment to the Council for years to come.

We must also draw attention to the cumulative impact of both the housing/community hub development and the secondary school. Together they risk breaking the transport capacity of the area and significantly increasing safety risks in particular. The proposed mitigations relating to the transport-related impacts – particularly at the Sheen Lane level crossing and elsewhere in the Mortlake Station zone – are woefully inadequate.

#### The public benefits in the approved scheme

##### Application A: Housing and new community hub

These benefits are listed on page 361 of the officer's report as follows:

1. Use of brownfield land for housing and....

2. Provision of housing that will make a significant contribution to meeting the Council's targets. We contend that such a contribution can be made with a scheme that complies with the Council's Planning Brief and current Draft Local Plan. There would be fewer units but the public benefits would be greater as the development would be less dense.
3. Provision of affordable housing above what is economically viable.... We note the percentage of affordable housing is 6% of total units and 7% of total habitable rooms. This is a very small public benefit. By contrast some of the private accommodation will no doubt be purchased by overseas investors – in common with numerous other riverside sites – which is an issue outside the Borough's control, indeed outside the Mayor's control, and one which needs to be addressed by Central Government.
4. Employment opportunities and uplift and....
5. Provision of mixed and community uses and new heart for Mortlake. As already indicated in our comments on the amendments above, we need office workers to bring life into this new heart for Mortlake and to contribute to the local economy. Without them there will be less public benefit.
6. Retention, sensitive alterations and reuse of on-site heritage assets and....
7. Setting of heritage assets. We contend that the setting of the Maltings is not improved by buildings rising to a greater height on the same riverside. There is no public benefit here.
8. High quality design. We asked for a Design Review Panel to be set up when the original application was submitted in 2018 but this did not occur. As a result there have been fundamental flaws in the design, some of which even the Council's Planning Committee have recognised, and they have been by-passed with sticking plaster applied. In that sense there has been a failure in 'high quality design'. In terms of detail, we have never felt comfortable with the aesthetic, as we have stated in the past, though earlier simplification of the external detail of the blocks, for which we do have detailed information, has helped.
9. Open space. Extensive areas of enhanced public realm and new community park, improved permeability, green link to riverside and....
10. Greater greening throughout site. In our view the green link is a public benefit, the community park is a questionable public benefit being alongside a heavily trafficked main road, and some of the public realm in the housing will be overshadowed and could become private if residents demand it, hence not a public benefit. Examples exist of open space in riverside developments elsewhere protected by notices saying open to the public during certain hours of the day only.
11. Enhancement and enlivenment to streetscape and riverside, enhanced views and....
12. Removal of large redundant industrial buildings, enhancement of towpath, etc. We contend that there is no public benefit on the riverside. Compared with the 4-storey development and thickly wooded towpath on adjacent riversides the proposed development is much higher and has a canyon effect on the river.
13. Layout that gives priority to pedestrians and cyclists. We contend that this is beneficial only in part. The facilities for pedestrians and cyclists proposed at the Sheen Lane level crossing are seriously inadequate and the joint use of the towpath by pedestrians and cyclists needs addressing.
14. Enhancement to flood defence. We contend that this is not a public benefit because it would make the existing flood defences between the site and Barnes Bridge more vulnerable. In addition, in the event of failure or over-topping of the Thames Barrier the storm surge flooding would be funnelled into the High Street and Sheen Lane area. These issues need to be addressed further.
15. Toucan crossing along A316. Whilst there is an existing pedestrian crossing under Chiswick Bridge with stairs up to the A316 on both sides, we can see that the toucan crossing offers some benefit in that cyclists have difficulty in using these staircases and would prefer to access the A316 via the ramp on the east side.

Application B: Secondary school and all-weather pitch

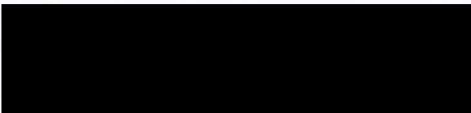
These benefits are listed on page 363 of the officer's report as follows:

1. Sporting benefits that far exceed that of the existing site, and will contribute towards addressing deficiencies in the area and borough. We would argue that, whilst beneficial in some ways, such a facility will be fenced in and floodlit and this will cause harm visually to residents in the immediate surrounds.
2. Rare opportunity to provide a much-needed secondary school with sixth form, which would be afforded with great weight. Whilst there are some members of our Society who agree that a new secondary school is needed, most members are of the view that the school might have been needed seven years ago when it became apparent that the baby boom of 2008-12 would put huge pressure on existing secondary schools in the area (and indeed is now doing so) but that since then primary schools are now evidently experiencing a significant loss in their pupil populations due to a dramatic decline in birth rates since 2012. With an uncertain future ahead of us this decline is likely to continue and we challenge the Council's decision to allow the secondary school to be built. The likely consequence is that the Richmond Park Academy will lose out. At the same time Thomson House Primary School are not happy about being located in two buildings separated by a high-risk level crossing and no outdoor space on site, hence the pressure to use Mortlake Green – and we urge the Council to reconsider the proposal for a primary school on the site as indicated in the original Planning Brief.

Our conclusion, then, is that the social benefits do not outweigh the harms.

On a final note, we have seen that the development on the west side of the site is still in outline and yet parts of it, notably the affordable housing, are in Phase 1. Surely the Mayor will expect to see detailed plans for Phase 1 before making any decision on this part of the Brewery site?

Yours sincerely



Tim Catchpole  
Chair