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London Borough of Richmond upon Thames
Environment Directorate/Development Management
Civic Centre
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1, Tapestry Court
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Wednesday 31.01.2024

Dear Lucy,

Former Stag Brewery - Mortlake Applications 22/0900/OUT & 22/0902/FUL

Following the Council's decisions on these two applications at planning committee in July last year there were revisions made to the National Planning Policy Framework on 19th December 2023. Amongst those revisions is Para 130 which now gives greater protection from residential schemes which due to their composition in built form and density are deemed to be wholly out of character with the existing area.

This clause is introduced by the Department for Levelling Up, Housing & Communities due no doubt in part to representations from communities such as ours here in Mortlake who have, or might have, been at risk of inappropriate development in their locale.

In the case of the Stag site the residents of Mortlake and surrounding areas have made vociferous objections to the earlier and current proposals due to the density of those designs. That density is evident as a result of the interplay between the footprint of the layout and the heights of the buildings within the scheme.

The scheme which went to committee last July has now gone through a series of design amendments which go before the planning committee again this evening.

However, having read the Officers' report to committee there appears to be minimal reference to this very significant change in policy in the NPPF. In the Executive Summary Item 1.7 seems to suggest that the recent design amendments which include reduced height in places are changes which are not of a nature to alter the conclusions made by committee in July last year, but does not review the proposed density of the proposals in relation to the density and character of the existing area. Yes there are some tall buildings at the core of the former industrial site but the prevailing character around Mortlake is of 2/3 storey terraced housing at low density. We maintain that the current proposals are "*wholly out of character with the existing area*".

Item 8.53 makes reference to the new NPPF, and para 130, but in our view does not highlight the need for the committee to re-consider their July decisions in the light of this major change to National Planning policy.

If this specific new policy item is not highlighted this evening then we are of the view that any decision could be un-sound and would by linkage also affect Application B.

There is also the question as to whether the late 2023 consultation period for the amended scheme would have given the public insufficient time to comment on the proposals in light of the late date of the NPPF changes issued on 19th Dec.2023.

yours sincerely

Peter Eaton ARB RIBA FRIAI

for and on behalf of Mortlake Brewery Community Group.