



**Comments on the Planning Applications
for the redevelopment of the former Stag Brewery**

Mortlake

for the Mayor of London

Ref: GLA 4172

27 Sept. 2020



The Mortlake Brewery Community Group (MBCG)

MBCG is grateful to have the opportunity to comment on the latest plans which have been produced to satisfy the Mayor's requirements. However, whilst we appreciate the need for the housing to include a greater affordable quantum, we are much concerned that this has been done through a significant intensification of development on the site placing an even greater strain on the existing transport infrastructure which is severely constrained by the River, by the railway and its level crossings and by the Chalker's Corner junction; and also placing a greater strain on the existing social infrastructure. In this representation we will be drawing your attention to these issues, but first we must introduce ourselves.

MBCG was founded in 2009 at the time when LB Richmond Council was initiating a Planning Brief in the knowledge that the Brewery would soon be closing down. We collaborated with the Council in the preparation of this Brief and were pleased with the final document when it emerged in 2011. We regrouped when the site was sold in 2015 and our aim has been to ensure that the development scheme would follow the Brief to the letter. However, we soon learnt that the Council was making two fundamental changes to the Brief which, alas, would spell disaster for the local community.

Our Group has over 800 members based not only in Mortlake, but in East Sheen and Barnes, and there are several other local groups who have associated with us including the Mortlake with East Sheen Society, Mortlake Community Association, Thames Bank Residents Association, Wadham Mews Residents Association, Chertsey Court Action Group and, further afield, the Barnes Community Association, Kew Society, West London River Group and CPRE London, all of whom are making representations to the GLA separately in support of our concerns. Collectively we are a group of over 4,000 members.

Within our Group – including the associated Groups but excluding those listed as further afield – we have in-house professional expertise in urban planning, transport planning, architecture, heritage, civil engineering, schools planning, and environmental impact assessment including specifically air quality. Those who have contributed to this report are listed, with their potted biographies, in Appendix F.

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Executive Summary

Applications in conflict with London Plan Policies

Application C for the reconfiguration of Chalker's Corner has already been refused and should not be reconsidered. Chalker's Corner and the Sheen Lane level crossing are constraints that must dictate the quantum of development on this site.

Application A has a density akin to central London, not suburban Richmond, and as such is unsustainable because it lacks appropriate infrastructure requirements. It is thereby in conflict with Policy 3.4 of the current London Plan (optimising housing potential) and Policies D3 (optimising site capacity) and D2 (infrastructure requirements for sustainable densities), both of the New London Plan and needs to be scaled down drastically. It is also in conflict with Policy H1C (heritage conservation and growth) and Policy S1 (Air Quality), both of the same New London Plan.

Application B, alas, cannot be scaled down because secondary schools today have to be large and include large sixth forms to be viable. What is important, however, is for such schools to have sites that are not cramped and locations that have good accessibility. The proposed location is in conflict with the location criteria in Policy S3 of the New London Plan (Education) and its all-weather pitch is in conflict with Policies S5 (Sports and Recreation Facilities) and G4 (Open Space), both of the New London Plan. In our view there is no need for this new school and any increase in demand for school places can be absorbed in existing schools.

Inadequate Supporting Information

In addition to the above we are of the view that any decision on these applications in November 2020 would be premature for the following reasons:

1. Phase 1 is now the western part of the site, for which planning permission is still being sought in outline. Any application within or adjacent to a Conservation Area and Listed Buildings needs to be the subject of detailed planning permission, as was the eastern part of the site when the planning applications were originally submitted two years ago. This is particularly important with regard to the uplift of development to 4 storeys abutting the backs of Listed Buildings in Thames Bank. Photomontages of the Phase 1 development need to be completed now and not at a later date and likewise the model needs to be updated.
2. The supporting documentation ignores recent Government guidance on design, notably the National Design Guide (October 2019) and it is essential that this latest scheme is submitted to an independent Design Review Panel.
3. The five options for Chalker's Corner should have been presented long before this late stage in the planning process. They need to be properly assessed before any decision is taken about the development as a whole.
4. The Transport Assessment needs to be updated to take into account future scenarios concerning the restoration, rebuilding or otherwise of Hammersmith Bridge and also the prospect of other bridge closures and the growing popularity of people working at home instead of commuting; also the latest traffic restrictions deterring commuter traffic in Richmond Park.
5. The Air Quality Assessment also needs to take account of such scenarios.
6. The ES Drainage Assessment Addendum makes no mention of whether it is sensible to create such a large basement in a flood-risk area when the Thames Barrier is now halfway through its lifespan.

7. The supporting documentation on the GLA's website does not include any report justifying high density housing in this location and in particular at this moment in time when it is proving unpopular during the COVID 19 pandemic and indeed future pandemics due to the prospect of crowded communal areas and lifts.
8. The supporting documentation on the GLA's website does not include any report justifying the need for the secondary school and its chosen location and we insist that this must be provided before a sensible decision on the application for the school can be taken.
9. The supporting documentation on the GLA's website does not adequately address the issues of the loss of cricket and other uses of the grass playing fields, notably the use for relaxation and mental health support during the COVID 19 pandemic and indeed future pandemics.
10. The increase in accommodation will no doubt require further negotiation on the s106 agreement covering for example additional works at the Sheen Lane level crossing and an increase in the GP mitigation.

Our Recommendation

Because of the conflict with London Plan policies and because of the inadequacy of the supporting information we urge the Mayor to request that the scheme be significantly scaled down and to postpone the public hearing until such time as a more acceptable scheme is offered. And when that scheme is ready to be approved, we urge the Mayor to impose a condition that no work can commence until Hammersmith Bridge in whatever iteration is fully open for use by pedestrians, cycles, cars and vehicles up to and including at least fully laden single decker buses.



1. Brief History

1.1 The Planning Brief

There has been brewing on this site since the 15th century. The Brewery reached its peak of expansion in the 20th century employing some 1500 staff, most of whom lived locally and walked or cycled to work, but it has finally closed down in the past decade.

The Council's Planning Brief emerged in 2011 after a consultation exercise with the local community. It prescribed a housing development with community hub including retail and commercial on the eastern part of the site (east of Ship Lane) and more housing plus primary school alongside retention of the grass playing fields on the western part of the site. Locally listed buildings in the eastern part, namely the Maltings on the riverfront and the former hotel and bottling plant in Mortlake High Street would be retained as features in the new development, and a green link would be created through the site from Mortlake Green to the river.

The number of housing units was not specified but the extent of development was clearly defined by storey heights (up to 6 storeys) with setbacks on both the riverside and Mortlake High Street. The housing in the northwest part of the site abutting Thames Bank and Williams Lane would be significantly lower (3 storeys) in keeping with this area.

The eastern part of the site is 3.1 ha and the western part 5.5 ha, making the total site area 8.6 ha.

In 2016 we heard rumours that the Council was going to make significant changes to the Brief and in 2017 our suspicions were confirmed when the Draft Local Plan update indicated that the primary school on the western part of the site would be replaced by a 6-form entry plus 6th form secondary school and the grass playing fields would be retained and/or reprovisioned.



1.2 The Planning Applications

In 2017 there were two public exhibitions of the Applicant's emerging plans. At both exhibitions the playing fields, which are designated as Other Open Land of Townscape Importance (OOLTI), were shown replaced with an all-weather surface and the secondary school was shown alongside it in different locations.

The surprise at these exhibitions was the proposed reconfiguration of Chalker's Corner which had not featured in the Planning Brief but was deemed necessary in order to increase the capacity of the junction and allow improved accessibility for the site.

At the end of the year MBCG made a representation at the Public Examination of the Local Plan expressing disapproval of the planning guidelines for the Brewery site and insisting also that the Plan's policies on Education should include guidance on site size, location and accessibility. In the Inspector's Report that followed our concerns were ignored.

In 2018 the planning applications A, B and C emerged. MBCG responded with a 125-page representation addressing all the key points, namely the density of the development, the traffic generation and its impact on the existing transport infrastructure, the inadequacy of the school in terms of its restricted size and poor accessibility, and the tragic loss of the grass playing fields. We were also critical of the proposed reconfiguration of Chalker's Corner as it entailed the loss of trees in the front garden of Chertsey Court (another OOLTI).

Later that year MBCG responded with a second representation (45 pages) challenging the need for the secondary school. This could not in theory be addressed as part of the application because, coming from a Central Government Department, the school already had deemed approval and the only issues to be addressed were the site size and accessibility. Nevertheless the inclusion of the school was turning out to be a major problem.

In 2019 the applicant made refinements to the scheme but they were very minor and included the reduction of units from 817 to 813 which was not going to make any difference to the density nor to the traffic generation.



1.3 The Council's Decision and the Mayor's Call-in

In January this year MBCG fielded a team of members making representations to the Planning Committee. This was a travesty because no-one was cross-examined.

We were nevertheless pleased that the Committee had decided to take Application C first (the reconfiguration of Chalker's Corner) and refused it on the grounds of loss of trees, loss of the OOLTI and increased risk of exposure to poor air quality. Interestingly there was much discussion about refusing it on the grounds that the reconfiguration would simply attract more traffic such that Lower Richmond Road will very soon return to existing levels of congestion, but alas there is no policy that covers this.

We naturally assumed that the refusal of Chalker's Corner would lead to the refusal of Applications A and B on grounds of poor accessibility but the Committee were clearly intent on approving Application A as it enabled the Council to reach its housing target at a single stroke and Application B because they had found a site for the secondary school that the DfE had inflicted upon them. As for the poor accessibility the Committee's view was that this could be mitigated by the implementation of Travel Plans aimed at getting residents to reduce their use of the car.

The Council's decisions were subject to direction from the Mayor of London. On 4th May the Mayor called in the applications for his own determination.



The front garden of Chertsey Court (photo taken from the top floor) showing a painted yellow line denoting the proposed landtake at the Chalker's Corner junction. All the mature trees beyond the yellow line would be removed in order to bring traffic closer to Chertsey Court.

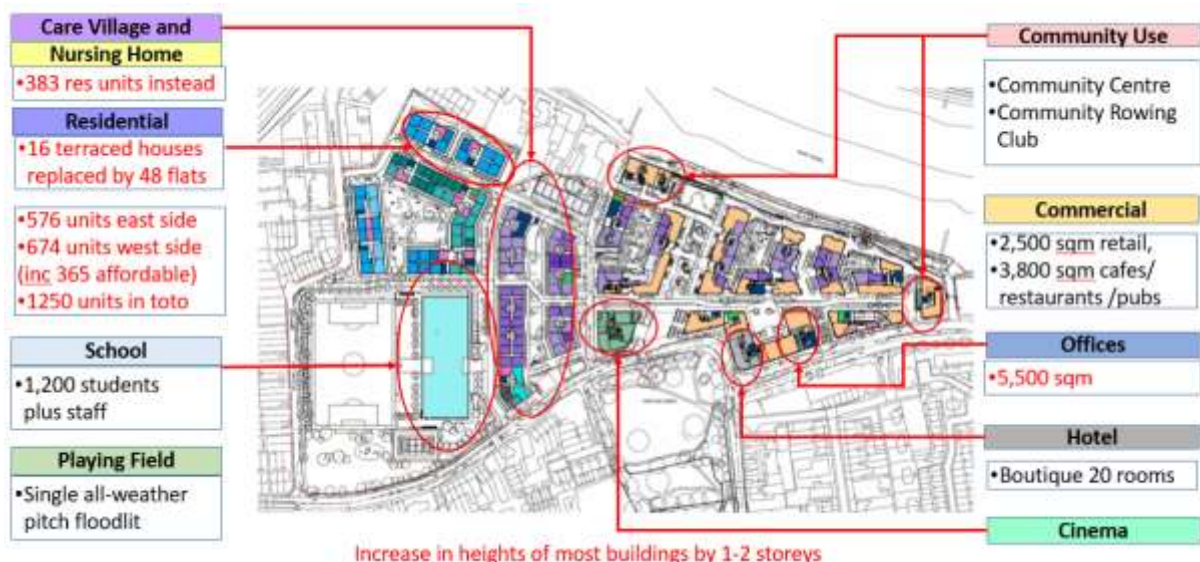
2. The Latest Scheme

2.1 The Overall Plan

Following the Mayor's call-in the applicant has revised the scheme to include a significant addition of affordable housing. Whilst we fully support the increase in the affordable element, we are much concerned that this comes with an overall increase in the density, heights and massing of the development. We are also concerned about the replacement of sixteen 3-storey terraced houses backing onto Thames Bank with two 4-storey blocks of 48 flats which could impact on the settings of Grade II listed buildings in this area.



The scheme approved by the Council's Planning Committee in January 2020



The scheme today with the main changes shown in red text.

2.2 The Basement Carpark

The basement carpark has decreased in size and enabled a saving in cost of about £17 million but there is still much excavation to be done entailing the removal of 25,000 cubic metres of earth in presumably about 2,500 trucks. The alternative of barging the earth downriver is supported by the Port of London Authority but currently not allowed due to Hammersmith Bridge being unsafe underneath as well as above.

We note that the ES Drainage Addendum recognises that the basement will potentially restrict drainage routes to the River, that the proposed mitigating drainage channels have been tested using a model and that the results indicate no flooding for the 1 in 100 year plus 40% climate change storm event. However, there is no mention of whether the model has made assumptions about the future of the Thames Barrier which is now halfway through its lifespan.



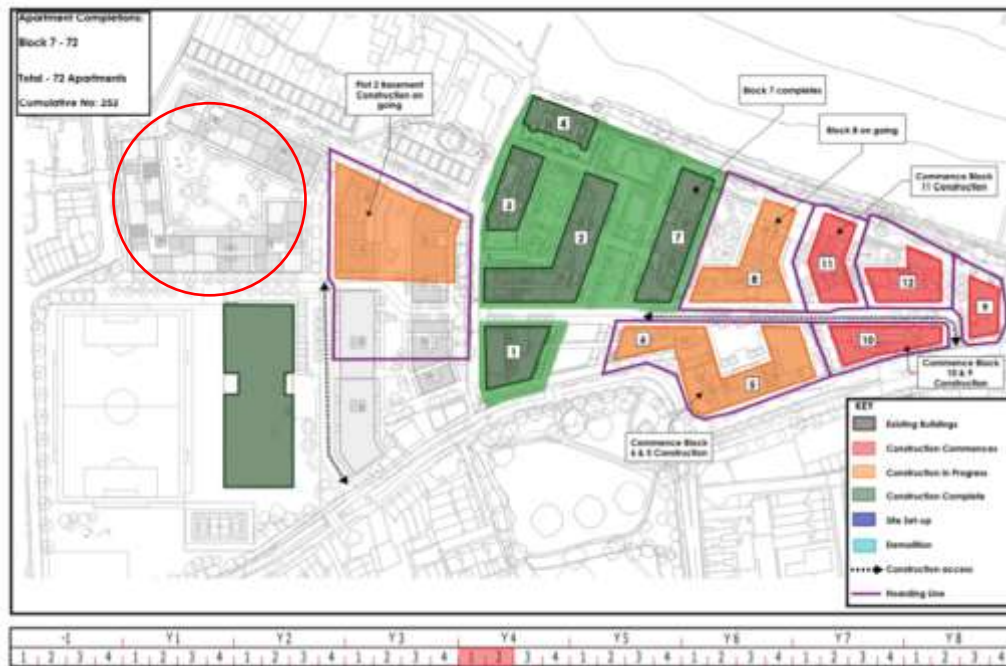
The scheme approved by the Council's Planning Committee in January 2020



The scheme today with the main changes shown in red text.

2.3 The Phasing

In our comments on the previous scheme we were concerned to see that the affordable housing was in a late phase in the western part of the site (shown in red circle below). We note that the phasing has now changed and are pleased to see that the affordable housing, still in the western part of the site, is now in Phase 1. Phase 1, however, is the subject of an outline application and needs, like Phase 2, to become subject of a detailed application, especially as it abuts a Conservation Area and Grade II Listed Buildings in Thames Bank.



Phasing in the Previous Scheme

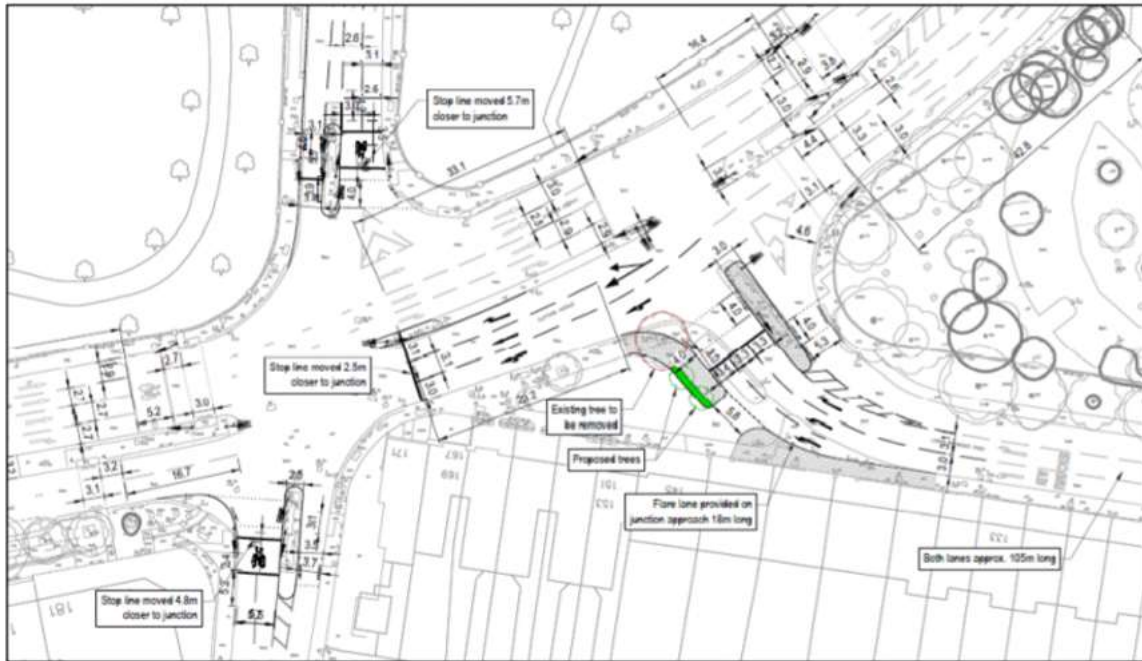


Phasing in the Latest Scheme

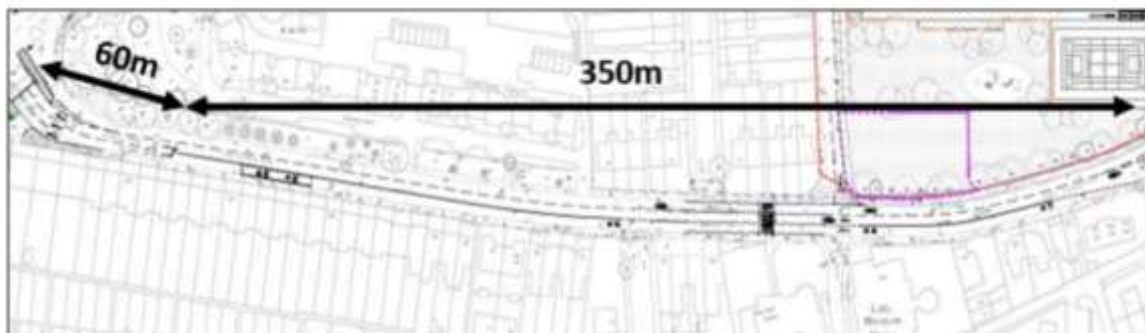
2.4 Chalker's Corner

The applicant has given further thought to this junction and generated five options as follows:

- 1) Do nothing;
- 2) Introduce a left turn lane from Lower Richmond Road into the A316 (as below) which would lose a few parking spaces in the carpark at this location;



- 3) Introduce a bus lane along Lower Richmond Road (as below) which would displace 36 parking spaces along this stretch of road;



- 4) Combination of Options 3 and 4;
- 5) Bring back the scheme which was refused by the Council's Planning Committee in January 2020.

3. Density and Design

3.1 Density

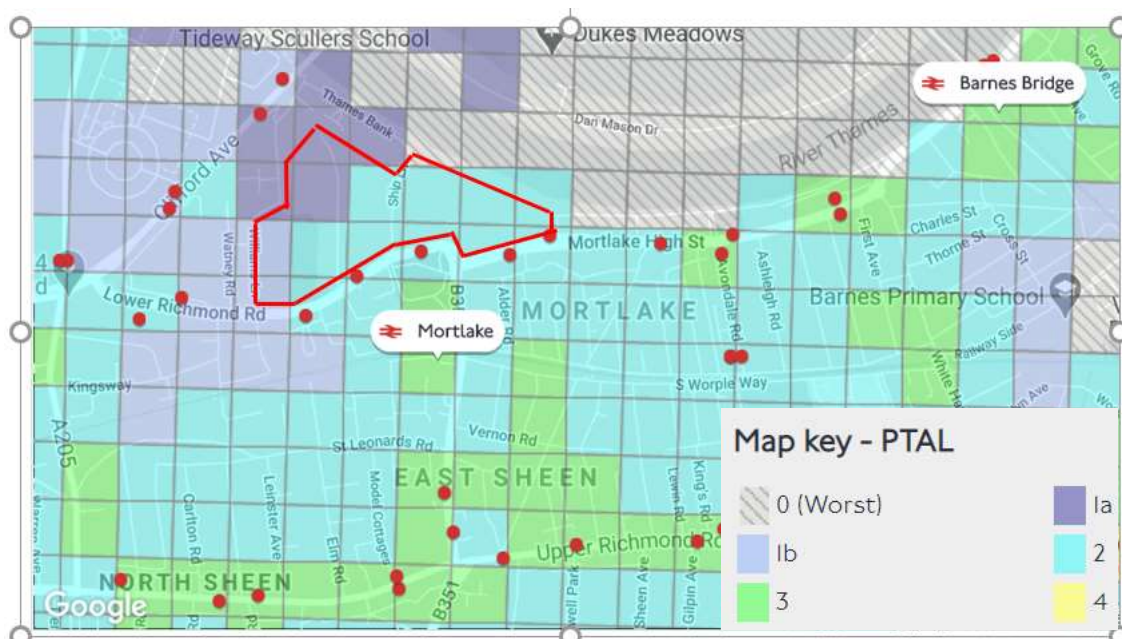
The development has now increased from 813 units plus 80-bed nursing home to 1,250 units with nursing home removed. This presents a 40% increase in units and has been enabled by a change in the residential mix/uses and increases in building heights. The school remains, and the other commercial uses have been modified. The current London Plan policy on density is:

Policy 3.4 Optimising Housing Potential: Development should optimise housing output for different types of location within the relevant density range shown in Table 3.2.

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150 – 200 hr/ha	150 – 250 hr/ha	200 – 350 hr/ha
3.8 – 4.6 hr/unit	35 – 55 u/ha	35 – 65 u/ha	45 – 90 u/ha
3.1 – 3.7 hr/unit	40 – 65 u/ha	40 – 80 u/ha	55 – 115 u/ha
2.7 – 3.0 hr/unit	50 – 75 u/ha	50 – 95 u/ha	70 – 130 u/ha
Urban	150 – 250 hr/ha	200 – 450 hr/ha	200 – 700 hr/ha
3.8 – 4.6 hr/unit	35 – 65 u/ha	45 – 120 u/ha	45 – 185 u/ha
3.1 – 3.7 hr/unit	40 – 80 u/ha	55 – 145 u/ha	55 – 225 u/ha
2.7 – 3.0 hr/unit	50 – 95 u/ha	70 – 170 u/ha	70 – 260 u/ha
Central	150 – 300 hr/ha	300 – 650 hr/ha	650 – 1100 hr/ha
3.8 – 4.6 hr/unit	35 – 80 u/ha	65 – 170 u/ha	140 – 290 u/ha
3.1 – 3.7 hr/unit	40 – 100 u/ha	80 – 210 u/ha	175 – 355 u/ha
2.7 – 3.0 hr/unit	50 – 110 u/ha	100 – 240 u/ha	215 – 405 u/ha

Table 3.2: Density Matrix (habitable rooms and dwellings per hectare)

The site is shown on the Public Transport Accessibility Level (PTAL) map of London as partly in Zone 2 being close to Mortlake Station and bus stops and partly in Zones 1a and 1b being further away from such public transport infrastructure.



The Brewery site superimposed on the PTAL map

The eastern part of the site is zoned PTAL2 and is urban in character while the western-most part of the site alongside Williams Lane and northwards to Thames Bank is zoned PTAL1 and is suburban in character. The density of the former should not exceed 450 habitable rooms/hectare (hr/ha) and the latter not more than 200 hr/ha. The density approved by the Planning Committee for the whole site was 466 hr/ha, albeit marginally above the upper limit of 450 hr/ha. The density now proposed in the latest scheme is 597 hr/ha using the applicant's residential site area as 6.07 ha (this having increased from 5.88 ha in the previous submission).

The Applicant has not been transparent about how this figure has been arrived at but our own calculations show the residential site area as 5.64 ha. Our calculation shown on the next page arrives at a density of 643 hr/ha which is just short of the upper limit of not PTAL2 urban but PTAL2 central, i.e. on a par with development in central London. We strongly object to such a high density being imposed on our suburban area.

In terms of the number of units, the plan below shows how the average density in Mortlake as a whole is roughly 70 units/hectare (u/ha) whereas the applicant has shown a density of 206 u/ha while we believe it to be more like 222 u/ha.

The supporting documentation on the GLA's website does not include any report justifying high density housing in this location and in particular at this moment in time when it is proving unpopular during the COVID 19 pandemic and indeed future pandemics due to the prospect of crowded communal areas and lifts.



Density in Mortlake in units/ha

Residential area used for density calculations								
Block nos.	Use	Site area	Total floorspace		Res	Non-res	Open space	Totals
			Res	Non-res	site area	site area		
			sq ft ¹	sq ft ¹	sq ft ¹	sq ft ¹		acres ²
1	Cinema	10408		47073	0	10408	1.401	
2	Res + flexi	21339	162107	7230	20428	911	0.338	
3	Res + flexi	11633	71629	2105	11301	332		
4	Res + flexi	6956	38678	5789	6050	906		
5	Office/hotel	18628		68767	0	18628	0.531	
6	Res + flexi	8568	35392	5691	7381	1187		
7	Res + flexi	14969	117884	7431	14081	888	0.393	
8	Res + flexi	16746	134194	5521	16084	662		
9	Res + flexi	5499	20713	4313	4551	948		
10	Res + flexi	9778	48819	3442	9134	644		
11	Res + flexi	9864	75104	4109	9352	512	0.205	
12	Res + flexi	9492	60144	4647	8811	681		
	Totals	143880	764664	166118	107175	36705	2.868	
		ha			ha	ha	ha	
	Tot blocks east	1.34			1.00	0.34		1.34
	Tot O/S east						1.16	1.16
	Internal roads & landscaping							0.60
	Tot east acc to Planning Brief							3.10
13	Res	8260			8260		0.679	
14	Res	6782			6782			
15	Res	14135			14135			
16	Res	11543			11543			
17	Res	11325			11325			
18	Res	36775			36775		0.957	
19	Res	15804			15804			
20	Res	8213			8213			
21	Res	8213			8213			
22	Res	6172			6172	Comm. Park	0.783	
	Totals	127222			127222		2.419	
		ha			ha		ha	
	Tot blocks west	1.18			1.18			1.18
	Tot O/S west						0.98	0.98
	Tot west							2.16
	School + pitch ³					2.17		2.17
	Bus turnaround					0.13		0.13
	Internal roads & landscaping							1.04
	Tot west acc to Planning Brief							5.50
	Tot east and west acc to Planning Brief							8.60
	Tot east and west acc to Applicant (includes towpath during construction)							9.24
Density Calculations								
	School + pitch ³		2.17					
	Bus turnaround		0.13					
	Other non-res		0.34					
	Community Park		0.32					
	Total non-res		2.96		Units	Density	Hab rooms	Density
	Total res site area		5.64		1250	222	3625	643
	Applicant's res area (2019)		5.88		1250	213	3625	616
	Applicant's res area (2020)		6.07		1250	206	3625	597
	Notes							
	¹ Figures taken from applicant's GEA tabulation							
	² MBCG's measurements							
	³ Applicant's school report							

3.2 Design

The New London Plan has removed Table 3.2 which has featured in every London Plan since 2008 but still expects applicants to submit details of the numbers of units and habitable rooms. Instead it now includes:

Policy D3 Optimising site capacity: All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations....

We believe this policy to be retrograde as decisions based on a design-led approach are bound to be subjective whereas decisions referring to a density matrix, which was the culmination of years of detailed research, are likely to be more objectively based and therefore more robust.

On a more worrying note is the phrase “optimising site capacity.” These latest plans for the Brewery have not optimised – but instead maximised – site capacity.

The Applicant’s model below (which incidentally shows the previous scheme and does not appear to have been updated) gives an immediate impression of the size and scale of the building blocks in comparison with the 2 and 3 storey fabric of their surroundings and how the spaces between the building blocks appear cast in dark shadows. The increase in the heights of the buildings proposed can only worsen this situation.

Due to the importance of this site (it features prominently in the University Boat Race every year watched by millions) these planning applications in the past would have been submitted to the Royal Fine Arts Commission or to its successor body CABE for an independent assessment. These bodies have now been superseded by Design Review Panels but no such independent assessment has ever taken place. Nor does the latest supporting documentation make much, if any, reference to the policy and guidance set out in NPPF section 12, nor to the Government’s Planning Practice Guidance (July 2019), nor to the National Design Guide (NDG) (October 2019).

THE NDG was drafted by the Ministry of Housing, Communities and Local Government as the national planning practice guidance for ‘beautiful, enduring and successful places’. It states that the components for good design are: the layout (or masterplan); the form and scale of buildings; their appearance; landscape; materials; and their detailing. The NDG focuses on what it terms the ‘ten characteristics’, the first two of which are particularly relevant to this scheme: Context and Identity.

It is difficult to justify the proposals in relation to Context and Identity, particularly given the increase in the height of a number of the blocks, which are entirely out of keeping with the local typologies, density and scale; with the statutorily and locally listed buildings; and with the character of the area, where the prevailing heights are of 2 to 3 and 3 to 5 storeys.

The proposals do not present a good understanding of the local built form nor draw effectively on local architectural precedent. The height, scale and massing of the proposals remain distinctly urban in character and have no relationship with the suburban scale and density which gives Mortlake its distinctive character and appearance, such that the proposed development would fail to integrate successfully into its wider surroundings.

The mansion block typology which forms a major part of the riverside area of the development is atypical of Mortlake. Geographically, it is generally an urban, inner London type. Indeed, the Design and Access Statement makes clear references to riverside mansions further up the River at Putney and Fulham. While there are a few five-storey flatted blocks on Mortlake High Street, dense, tall developments are not typical of the built environment of Mortlake – its character or appearance. The closest riverside comparators are at Castlenau and Elm Bank Gardens, Barnes and Twickenham, adjacent to Richmond Bridge, in small developments of five storeys and attics at most.

3.3 Heritage

The Brewery site contains two locally listed buildings of townscape merit (BTMs), is wedged between the Mortlake Conservation Area to the north including Grade II listed houses on Thames Bank and the Mortlake Green Conservation Area to the south, and is an Archaeological Priority Area noted for the former Archbishop's Palace demolished in circa 1700 and Cromwell House demolished in 1857. The relevant policy in the New London Plan is:

Policy H1C: Heritage conservation and growth: Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings... Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

We note that the Environmental Statement admits that across all the heritage assets – the Conservation Areas, statutorily listed buildings and BTMs – the up-lift in heights is more detrimental to the setting than in the previous scheme (WIE, 2020, Table 4.29, Table 4.30). Significantly, this includes the Maltings Building, the key historic asset on the site, included in the Conservation Area, with a strong and special relationship with the river and with the adjacent buildings on Thames Bank. Yet it is dominated by the new development, which WIE notes, competes with it (ibid, 4.253) – **see illustration below showing the previous scheme and the latest scheme from near Barnes Bridge.**

Importantly the Town Planning Statement (July 2020, 13.15) finds that the increased heights affect the Maltings Building (within the context of the Conservation Area) to the extent that, in the terms of the NPPF, this constitutes less than substantial harm. However, they conclude that the public benefits of the scheme will outweigh the less than substantial harm caused to the Conservation Area (ibid, 13.16). We strongly disagree that the public's benefits will outweigh the harm. **For more details on our design and heritage assessment see Appendix D.**



Viewpoint 8: Proposed view from the Thames Path (path) adjacent to the car parking area on Dan Meeson Drive, looking southwest across the River Thames towards the Stag Brewery component of the Site.



Viewpoint 8: Proposed view from the Thames Path (path) adjacent to the car parking area on Dan Meeson Drive, looking southwest across the River Thames towards the Stag Brewery component of the Site.

4. Transport Infrastructure

4.1 Scale and Intensity of Proposed Development

The proposed intensification of the development will put a further strain on the existing roads and railway. The site is notoriously constrained by the river Thames to the North and the railway line to the South with a very low PTAL and a high level of traffic congestion. The relevant policy in the New London Plan is:

Policy D2 Infrastructure requirements for sustainable densities

C. 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.

The Chalker's Corner junction improvement has been refused and the other options for planned supporting infrastructure at this junction described in Section 2.3 above are discussed in Section 4.3 below. The planned supporting infrastructure at the Sheen Lane level crossing is merely cosmetic and is discussed in Section 4.4 below.

The site is zoned PTAL2 (part of it PTAL1) and the Applicant argues that the PTAL could be improved with additional bus services. This could be done but only very marginally and over time. The continuing uncertainties over the future patterns of bus services and their viabilities linked to both the closure of Hammersmith Bridge and the post-COVID demand for public transport could clearly frustrate the best intentions of the Applicant to promote sustainable transport usage by means of operating the proposed Travel Plan regimes.

In the Applicant's submissions, Table 5-1 of the TA Addendum report shows the forecast changes in modal and total trips generated comparing the original and the current proposals. These forecasts are said to be agreed between the Applicant and TfL although there appear to be some remaining questions over the figures used for the school. We also understand that the traffic modelling work is still ongoing. We can see from Table 5-1 that total 2-way am peak trips generate increase by some 7% from 2,391 to 2,559 and that the totals for the pm peak increase by some 12% from 1,862 to 2,081. We can see that walking and cycling trips are forecast to increase by between 4 and 17% whereas vehicle trips are to decrease by 3 and 13% during these periods despite the retention of the school and the significant increase in homes. These changes are driven by the "targets" set in the Travel Plans and the reduction in the amount of on-site parking (from 679 to 493 spaces). With regard to the reduction of parking, although encouraged by MBCG to make a reduction, the lower residential parking supply may well simply become more intensively used as this will be leased largely to the residential occupiers who value their car use most.

MBCG's trip forecasts have been consistently higher than those of the Applicant particularly when added to the actual survey data collected by MBCG's volunteers and contractors. This is a very serious matter when attempting to find effective solutions for example around the Sheen Lane level crossing.

With regard to trip generation and in recognition of the overall infrastructure capacity constraints of the area, MBCG strongly advocates a development quantity aligned to the original Planning Brief established by the then Council following the original comprehensive consultation processes.

The infrastructure capacity constraints of the area are illustrated in the photographic survey undertaken in 2017 in Appendix A.

4.2 The Secondary School

In para. 5.2.4 of the Applicant's Transport Assessment Addendum it is made clear that TfL has sought a more robust forecast of trip generation for the school. A somewhat arbitrary selection of other local "comparison" schools has been used for forecasting purposes. Although it is laudable to aim for a "car free" school, it is most unlikely that this can be achieved even in the longer term – particularly in a low PTAL area and where the catchment area is unclear. Of course a School Travel Plan (STP) will be established but, as with other established local schools with STPs, the evidence is that car use is still prevalent. For example, Christ's School has some 10% of its pupils travelling by car.

It is noted that the Applicant was originally requested to use Christ's School, Grey Court and Richmond Park Academy (RPA) as comparator sites (with the RPA subsequently excluded as it apparently has no STP). The original submitted material included details from the Council of the traffic generated by Christ's School (770 pupils and 90 staff) and Grey Court (1,246 pupils and 146 staff) operating with the benefit of STPs (N.B. today it is Christ's School 930 pupils and Grey Court 1,398). Even with similar STPs in place for the proposed school on the Stag site, some 300 vehicle movements could be generated in the morning peak hour taking the average rate arising from these two schools.

The Applicant has indicated that over a third of pupils are forecast to walk to and from the school and almost a half to use buses. Train and cycle use are forecast to remain very low – between 2 and 6%. Again, there are clearly uncertainties over the routes likely to be used.

The transport impacts of the proposed school are highly significant. Both the Applicant's and the MBCG's advisers forecast that the school would generate around 50% of the additional vehicular traffic in the morning rush hour. These forecasts already assume that a STP discouraging car use will apply. This cannot be depended on. Even if there were a justification for implementing the Chalker's Corner proposals, it would certainly be completely eroded if a primary school were substituted in place of the secondary school as envisaged in the Planning Brief.



Access to the school on the right is off this road which is gridlocked every morning

4.3 Chalker's Corner

MBCG's original transport and planning objections to Application C clearly gained traction with the Council as the Council opposed the scheme. There are now new alternative options for this junction but the original Application C is still proposed alongside the other options. Even if the new, denser development proposals were to generate marginally more vehicular traffic than the previous ones, MBCG is firmly of the opinion that Application C is in excess of what is needed to "improve" Chalker's Corner to mitigate the traffic and other road user impacts.

A part of MBCG's submission to the Council's Planning Committee stated that:

"The widening of the local approach, the Lower Richmond Road, to Chalker's Corner is judged by transport experts advising the MBCG to be the wrong solution as this would simply attract additional non-local traffic permanently onto this route via Mortlake High Street and Barnes Terrace at all times of the day. This would certainly increase the access problems already experienced along the Lower Richmond Road-Mortlake High Street route by local residents and the new users of the proposed development.

"The Officer Committee Report (page 187) notes that the traffic enhancements proposed for the eastern section of Lower Richmond Road and beyond are designed 'without providing reserve capacity that might attract additional traffic'. The technical evidence submitted by the developer's advisors with regard to the traffic impacts around Chalker's Corner were found to be counter-intuitive, internally inconsistent and unlikely to survive the scrutiny of an inquiry. It is stated by the Officer Committee Report (page 63) and by TfL that further traffic modelling is required to define the designs of the road proposals at Chalker's Corner and along the Lower Richmond Road. This proposal is expensive and damaging to the environment particularly for the residents of Chertsey Court. Interestingly, the same report (on page 15) states that 'officers do not dispute that Application C is not an application that was encouraged'.

"It is not clear whether the land required from Chertsey Court is available without the back up of a compulsory purchase order. Clarification is needed on this important aspect which affects deliverability. Any monies from the developer set aside for this proposal should be held in escrow as a contribution to a more/ strategic highway solution focused on the A 316 Chertsey Road and safety measures at the Sheen Lane level crossing".

The high-level policy objectives enshrined into local planning here and in Richmond and London as a whole include the encouragement of sustainable transport solutions when development occurs. This suggests strongly that a partial 'improvement' of local road traffic capacity to and from Chalker's Corner runs counter to these policy objectives. Any highways mitigation monies collectable to address this should be directed towards providing a strategic solution focusing on the A316 and possibly the A 205 routes. The opportunity to improve overall accessibility in the area should be taken by focusing entirely on increasing public transport services and improving conditions for cyclists and pedestrians.

We note that the Applicant and TfL are still engaged with further work on traffic modelling and in determining base traffic flows but particularly that, in the TA Addendum, para. 10.1.9 it is stated that the other options presented for Chalker's Corner will mitigate the forecast traffic impacts. On balance, in considering the other options, MBCG would prefer to see (the "light" scheme without the bus lane as this would remove too many residents' parking spaces from the Lower Richmond Road).

4.4 Active Travel and the Sheen Lane Level Crossing

The significance and seriousness of the combined impact of the school and the other development is starkly demonstrated at the Sheen Lane level crossing where conditions are already seen to be congested and dangerous (a high risk crossing as rated by Network Rail). The Mortlake with East Sheen Society (MESS) funded professional 48-hour video surveys of the area which clearly show alarming safety conditions (see photo below). The surveys are now still with Network Rail for detailed scrutiny and include evidence of serious problems.

The following text was included in MBCG's submission to the Council relating to the original, smaller scheme: "At this crossing, pedestrian movements are forecast to increase by between 52 and 68%, cyclist trips by some 70% and vehicle trips by 15 to 54%. This would certainly increase the accident risk. The Developer's vehicle counts over the crossing indicated significantly lower vehicular flows than those evidenced in our videos.

"Of these increases at the level crossing, the school is forecast to generate over half the pedestrian and vehicle trips and over 90% of the cycle trips in the morning rush hour. Our understanding is that only minor safety/cosmetic changes are being considered for the crossing (Officer Committee Report page 56) whereas far more effective safety solutions are achievable and fundable given a meaningful contribution from the two developers. We note Network Rail's comments dated 12th June 2018 set out in the appendices of the same report (page 324). Funding should be re-allocated from the car park and Chalker's Corner elements to provide an effective solution here and possibly to provide a higher proportion of affordable homes".

The current development proposals are significantly increased in scale and density, the school is still retained and greater emphasis is given to encouraging active travel. These changes clearly add even more pedestrian and cycling demands to the level crossing problems.





Afternoon exodus from Thomson House School



Broken barrier caused by impatient driver

4.5 Air Quality

This was a key issue that contributed to the refusal of the reconfiguration of Chalker's Corner and it remains a key issue. The relevant policy in the New London Plan is:

Policy S1 Improving air quality

B. To tackle poor air quality, protect health and meet legal obligations...development proposals should not: (a) lead to further deterioration of existing poor air quality.

The air quality in Mortlake has been shown to be poor and there is a possibility of significant effects arising on local air quality as a result of the proposed development.

The Air Quality model used has not taken into consideration some pertinent and very important variables such as increases in local and regional temperatures, increase in traffic due to the looming retrofit of many of London's bridges, or impacts from the increase in school traffic. As such the model is not close to an accurate prediction of air quality pollution emission in the next 10 years.

The model is by definition a prediction or forecast of emission levels that could be predicted, based upon the acceptance of a set of assumptions. Two of the major assumptions are that the future performance of the vehicle fleet will reduce the emission of toxic, harmful pollutants in the future. The second is that these vehicles will quickly populate the fleet at an exponential rate until they are the dominant vehicle. These two major assumptions are untested and as such, should be viewed as the very best scenario with a view to predicting air pollution emissions, when best practice would be to predict worst case scenarios.

According to DEFRA's Report 'Calibrating Defra's 2018- based Background NOx and NO2 maps' against 2019 measurements' published on August 28, 2020, for NOx values it was clear that the background maps generated using AQ models generally predicted concentrations lower than those measured.¹ The study conducted by Air Quality Consultants (who designed the model used in this analysis) demonstrated that the maps used to predict background NOx concentrations, which were generated from the currently acceptable AQ models, were on average under-predicting by 16%. Thus, a factor for calibrating the background maps for NOx should have been used in this analysis and wasn't.

We can therefore assume that the values presented for NOx in this report under-predict the NOx emission concentrations by 16%. It would be appropriate to base the AQ measurements on a site-specific set of data, rather than using Defra pollution maps, prior to making a decision about the significance of its impacts as a result of the proposed development.

The principle underlying this guidance is that any assessment should provide enough evidence that will lead to a sound conclusion on the presence, or otherwise, of a significant effect on local air quality. An impact is the change in the concentration of an air pollutant, as experienced by a receptor. This may have an effect on the health of a human receptor, depending on the severity of the impact and other factors that may need to be taken into account.

In this air quality EIA section, no attempt has been made to calculate the impacts from cumulative impacts to any significant degree. It is noted that this exercise would go above and beyond the requirements of the EIA at this current time, but as AQ is such an important facet of the decision-making process, it deserves an in-depth scientifically defensible study to be conducted.

¹ These maps cover the whole country on a 1x1km grid and are published for each year from 2017 until 2030, and can be downloaded from <https://uk-air.defra.gov.uk/data/laqm-background-home>.

5. Social Infrastructure

5.1 The School

The proposed intensification of the development will put a further strain on the schools in the area. As already mentioned, there are no policies contained in the Borough's Local Plan about the site size, location and accessibility of schools but the New London Plan includes the following:

Policy S3 Education

B Development proposals for education and childcare facilities should

- 1) locate facilities in areas of identified need**
- 2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling**
- 3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances.**

We have always acknowledged the need for additional secondary school places but not at this scale, nor met in this particular way. The GLA in their Stage 1 Report called for the Council to present a 'robust and evidenced case' for the proposed secondary school. This application still fails to include any such assessment or justification to support the need for a 6-form entry plus sixth form secondary school. We maintain that the data and assumptions used are flawed and pupil projections significantly exaggerated. Although there is a need for a modest level of new secondary places in the east of the borough these cannot be provided by the new school in time, after which the demand falls off. The Council's statutory obligation to provide sufficient school places can be met by expansion of RPA and Christ's School. The alternative approach has simply not been properly and sequentially tested. **For further details see our paper in Appendix E.**

Moreover, the proposed new school will damage the existing schools both in the short term and in the long term. In the short term, failure to expand will entail their having to accommodate the accumulation of additional pupils needing places before the new school can be built – up to six forms – in demountable classrooms staying on their sites for up to six years. In the longer term, the viability of their sixth form depends on their ability to recruit more pupils at Year 7. An unnecessary new school will threaten their existing intakes.

This school for up to 1,150 pupils will be on a cramped site, with minimal outside circulation space. The assigned managers will inevitably need to draw pupils from a much wider catchment area. This is at odds with the place needs assumptions and traffic data used to support this application. The inadequate recreation space for this number of pupils would be substantially less than other local schools and less than 50% of the minimum recommended site area under the DfE guidelines in BB103.

The site is conveniently accessible to pupils and staff arriving by train at Mortlake Station but most pupils are expected to arrive by bus, which is difficult when there is gridlock on Lower Richmond Road during the morning peak. Pupils arriving on their bikes or on foot from the south will need to negotiate the Sheen Lane level crossing which is already at saturation level for such modes at the peak arrival time (see photos on next page).

Finally, the entrance to the school will be off the Lower Richmond Road where the gridlocked traffic is currently generating air pollution levels very close to the EU/WHO target limit of 40 μgm^3 . It might be argued that these pollution levels will fall when the ULEZ is expanded next year to include Lower Richmond Road but this may be wishful thinking.

We have consistently argued that the secondary school needs to be replaced by a primary school as prescribed in the Planning Brief. One reason for the Council's change of thinking is that a primary

school has recently become established in the area since 2011 when the Brief emerged, namely Thomson House School. But, alas, it is located in two buildings on either side of the Sheen Lane level crossing and Network Rail claims that it was never consulted. Thomson House School has indicated that it would like to relocate to the Brewery site.



Pedestrians at Sheen Lane level crossing at 8.30am every morning on weekdays



5.2 Health Facilities

The proposed intensification of the development will put a further strain on the existing health facilities in the area. The New London Plan includes the following relevant policy:

Policy S2 Health and social care

A. Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

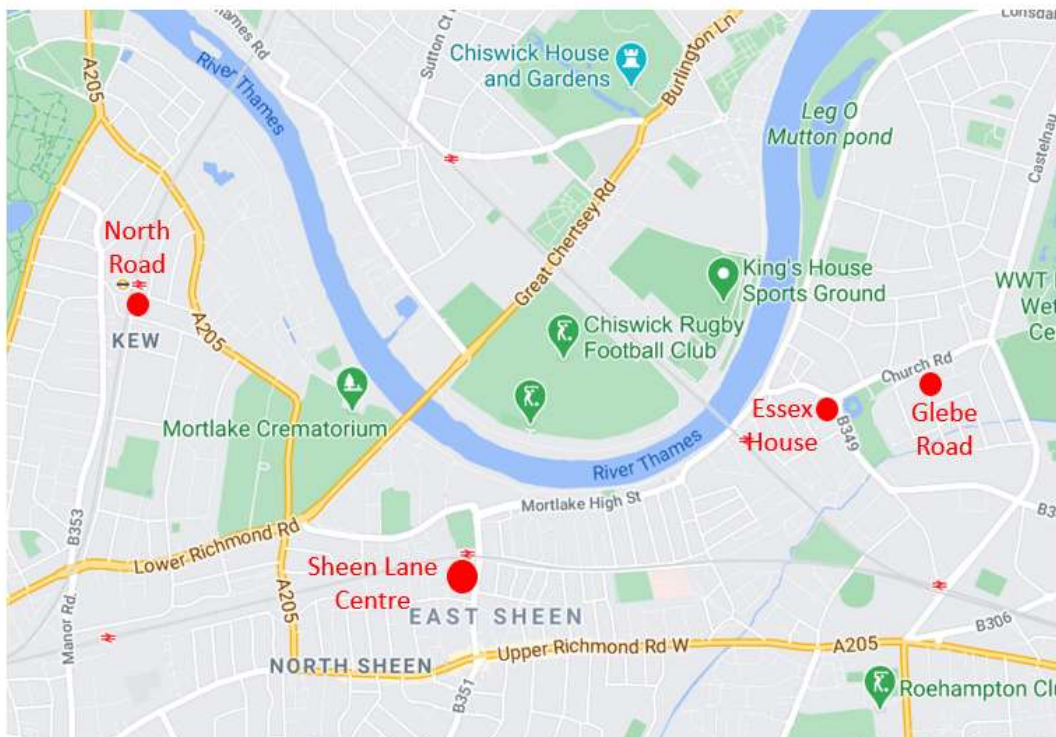
1) identify and address local health and social care needs within Development Plans....

When consulted on previous plans we were under the impression that a GP surgery would be included on the site associated with the nursing home and care village. With these two components gone the GP surgery has also gone.

We note that the Applicant's Health Impact Assessment Update (Table 2.2) indicates that all impacts on existing social infrastructure are positive with the single exception of GP surgeries where the impact is negative. The proposed mitigation required is funding through the s106 agreement to offset pressure on existing providers.

We are aware that the Officer Committee Report quotes a sum of £465,850 in the s106 agreement but there is no indication of where this funding is aimed. However, we have found the answer in the Community and Cultural Assessment which states that there is room for expansion at the North Road surgery in Kew – which is already out-of-date because this surgery is moving to new premises on the Kew Riverside.

With the significant increase in population in the latest scheme we must urge that the sum indicated in the s106 agreement be further uplifted. And with the prospect of no end to the current COVID 19 crisis and of further crises to come we urge that the sum be uplifted even further.



GP surgeries close to the site

5.3 Sports and Recreation Facilities

The proposed intensification of the development will put a further strain on the sport and recreation facilities in the area. The New London Plan includes the following relevant policy:

Policy S5 Sports and recreation facilities

Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:

(2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

This proposal is tied in with the school and forms part of the same Application B. The grass playing fields, which were laid out exactly 100 years ago, have been used for football by the Brewery, by local schools and not least by the England Football Team under the management of Alf Ramsey and captaincy of Bobby Moore for training. It is no doubt for this reason that the Applicant, presumably with advice from the Council, has seen fit to replace the grass with a single all-weather football pitch.

However, what the Applicant's advisers have failed to realise is that the grass playing fields have also been used for cricket, school sports days, the annual Mortlake Fair, allotments during World War 2 and most recently for relaxation and mental health support during the COVID pandemic. All these other uses will disappear. And while the replacement of the grass playing fields with an all-weather pitch will clearly meet the quantity criterion for football, the pitch will nevertheless be fenced in and floodlit and in visual terms will not likely meet the quality criterion.

Cricket will be a tragic loss. The late Bob Willis, former Captain of the England Team who lived locally very close to the Brewery site, wrote to the Leader of the Council before he died last year saying: "If a secondary school for 1,150 pupils is to be located on the Brewery site, then I am disappointed to see it equipped with just a single all-weather pitch in place of the existing two grass pitches and cricket square. The Council seems to be taking the view that the cricket square is not needed as the sport is in decline. Far from it – England has won the World Cup this year and women are now showing a lot more interest in the sport than ever before..."

The CEO of the England and Wales Cricket Board has also objected to this proposal saying:

"Whilst the cricket square has not been in use since 2003, there is significant local need to bring the square back into use for local sides, at both junior and senior levels. Despite Richmond being a 'green' borough, there is limited green space in Mortlake and therefore it is vital that this space is protected for community sport....

"Not only would bringing the site back into use for cricket represent a fitting tribute to the legacy of the late and truly great man of cricket that was Bob Willis MBE, it is needed now more than ever as we emerge from the COVID 19 crisis. We need to preserve and protect our outdoor spaces, particularly for those from disadvantaged backgrounds in urban areas who don't have the luxury of their own gardens to undertake physical activity."



Bob Willis

The full text of both representations is given in Appendix C.

5.4 Open Space

The playing fields, in addition to providing space for sport and recreation, are much treasured by the local community as a visual asset. The green velvet of the grass and the trees along the edges are protected as Other Open Land of Townscape Importance (OOLTI), being a local designation by the Council. The New London Plan includes a relevant policy:

Policy G4 Open space

B Development proposals should:

- (1) not result in the loss of protected open space**

The re-provisioning mentioned under Policy S5 above should surely apply here too and, in addition to the quantity and quality, the Borough's Local Plan goes a stage further and adds 'openness'.

In our view the loss of this treasured visual asset and its re-provisioning through the rest of the site does not meet these three criteria. The community park (being the remnant part of the playing fields to the south of the all-weather pitch) will be a small replacement for the grass playing fields, which have sometimes served as a community park, and could become even smaller if some of it is lost to a bus turnaround. The green link between Mortlake Green and the river will no doubt be an attractive feature of the development but the five courtyard spaces will be overshadowed by their surrounding buildings and will include hard surfaces; and their benefits to the community could be open to question as they are sure to become semi-private.

MBCG has produced a separate more detailed paper on the subject of the Sports Field and OOLTI Re-provisioning (see Appendix B).



6. Conclusions and the Community's Alternative

This concluding section repeats the Executive Summary and adds a brief introduction to the Community's alternative scheme.

6.1 Applications in conflict with London Plan Policies

Application C for the reconfiguration of Chalker's Corner has already been refused and should not be reconsidered. Chalker's Corner and the Sheen Lane level crossing are constraints that must dictate the quantum of development on this site.

Application A has a density akin to central London, not suburban Richmond, and as such is unsustainable because it lacks appropriate infrastructure requirements. It is thereby in conflict with Policy 3.4 of the current London Plan (optimising housing potential) and of Policies D3 (optimising site capacity) and D2 (infrastructure requirements for sustainable densities), both of the New London Plan, and needs to be scaled down drastically. It is also in conflict with Policy H1C (heritage conservation and growth) and Policy S1 (Air Quality), both of the same New London Plan.

Application B, alas, cannot be scaled down because secondary schools today have to be large and include large sixth forms to be viable. What is important, however, is for such schools to have sites that are not cramped and locations that have good accessibility. The proposed location is in conflict with the location criteria in Policy S3 of the New London Plan (Education) and its all-weather pitch is in conflict with Policies S5 (Sports and Recreation Facilities) and G4 (Open Space), both of the New London Plan. In our view there is no need for this new school and any increase in demand for school places can be absorbed in existing schools.

6.2 Inadequate Supporting Information

In addition to the above we are of the view that any decision on these applications in November 2020 would be premature for the following reasons:

- 1 Phase 1 is now the western part of the site, for which planning permission is still being sought in outline. Any application within or adjacent to a Conservation Area and Listed Buildings needs to be the subject of detailed planning permission, as was the eastern part of the site when the planning applications were originally submitted two years ago. This is particularly important with regard to the uplift of development to 4 storeys abutting the backs of Listed Buildings in Thames Bank. Photomontages of the Phase 1 development need to be completed now and not at a later date and likewise the model needs to be updated.
- 2 The supporting documentation ignores recent Government guidance on design, notably the National Design Guide (October 2019) and it is essential that this latest scheme is submitted to an independent Design Review Panel.
- 3 The five options for Chalkers Corner should have been presented long before this late stage in the planning process. They need to be properly assessed before any decision is taken about the development as a whole.
- 4 The Transport Assessment needs to be updated to take into account future scenarios concerning the restoration, rebuilding or otherwise of Hammersmith Bridge and also the prospect of other bridge closures and the growing popularity of people working at home instead of commuting; and also the latest traffic restrictions deterring commuter traffic in Richmond Park.
- 5 The Air Quality Assessment also needs to take account of such scenarios.

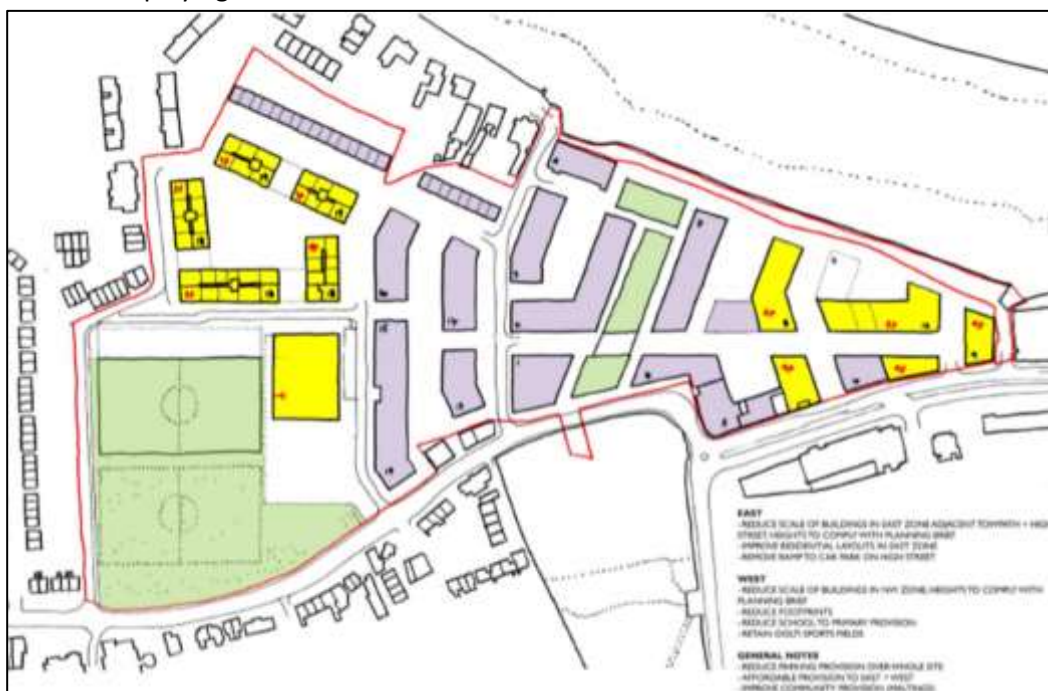
- 6 The ES Drainage Assessment Addendum makes no mention of whether it is sensible to create such a large basement in a flood-risk area when the Thames Barrier is now halfway through its lifespan.
- 7 The supporting documentation on the GLA's website does not include any report justifying high density housing in this location and in particular at this moment in time when it is proving unpopular during the COVID 19 pandemic and indeed future pandemics due to the prospect of crowded communal areas and lifts.
- 8 The supporting documentation on the GLA's website does not include any report justifying the need for the secondary school and its chosen location and we insist that this must be provided before a sensible decision on the application for the school can be taken.
- 9 The supporting documentation on the GLA's website does not adequately address the issues of the loss of cricket and other uses of the grass playing fields, notably the use for relaxation and mental health support during the COVID 19 pandemic and indeed future pandemics.
- 10 The increase in accommodation will no doubt require further negotiation on the s106 agreement covering for example additional works at the Sheen Lane level crossing and an increase in the GP mitigation.

6.3 Our Recommendation

Because of the conflict with London Plan policies and because of the inadequacy of the supporting information we urge the Mayor to request that the scheme be significantly scaled down and to postpone the public hearing until such time as a more acceptable scheme is offered. And when that scheme is ready to be approved, we urge the Mayor to impose a condition that no work can commence until Hammersmith Bridge in whatever iteration is fully open for use by pedestrians, cycles, cars and vehicles up to and including at least fully laden single decker buses.

6.4 The Community's Alternative

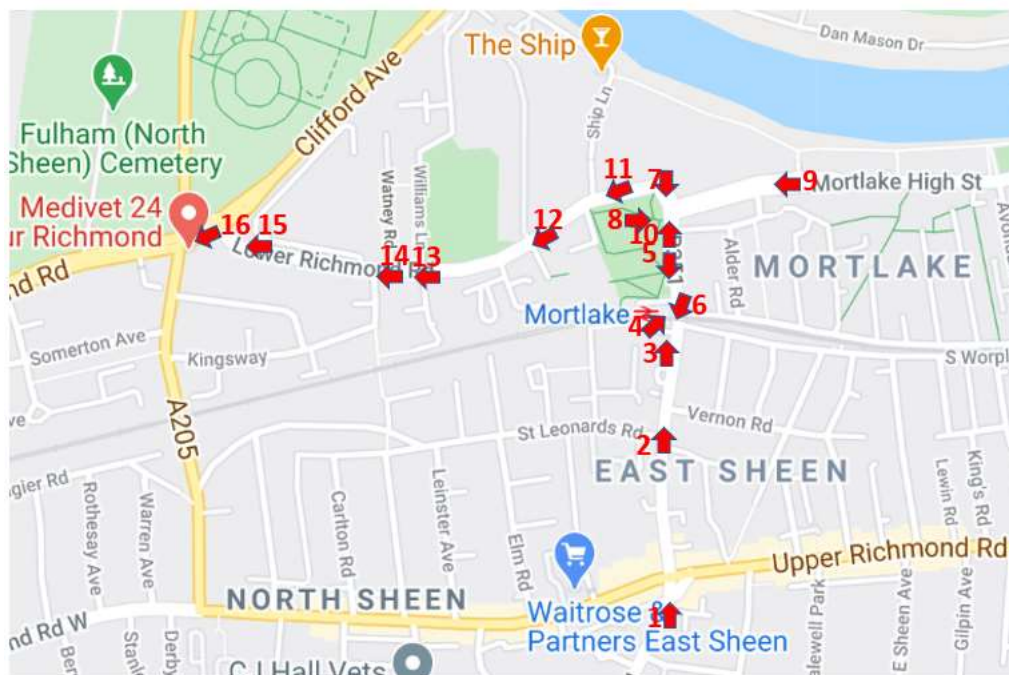
Last year MBCG launched its alternative master plan for the site (see below). It follows the basic layout of the Applicant's plan but reduces some of the heights (shown in yellow) providing a quantum of 700 units. It also removes the secondary school replacing it with a primary school and retains the playing fields intact.



Appendix A
Traffic Conditions in the Area
Photographic Survey
17 May 2017
8.15-8.45am

Traffic Conditions in the Area

Photographic Survey 17 May 2017, 8.15-8.45am



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 cameras



4. Thomson House School from level crossing – note cameras



5. Queue approaching level crossing from Mortlake roundabout – note cameras



6. Sheen Lane crossing from the camera seen in the previous three photos



7. Mortlake roundabout with queue approaching crossing along Sheen Lane



8. Mortlake roundabout with queue approaching from Mortlake High Street





9. Mortlake High Street with queue approaching Mortlake roundabout



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



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



12. Same queue approaching Chalkers Corner outside entrance to Brewery



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



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



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



16. Chalker's Corner – note tight space for traffic turning right towards Kew

Appendix B
Sports Field and OOLTI Re provisioning

STAG BREWERY SITE PLANNING STATEMENT

SPORTS FIELDS AND OOLTI RE-PROVISIONING

1.0 Introduction

The developer of the Stag site has claimed in their planning application submissions A & B that they have satisfied planning requirements for re-provisioning of the OOLTI protected sports fields which they propose to do away with and replace with a new secondary school and associated grounds. We disagree with this claim in the strongest possible terms.

Planning Officers in their report to Planning Committee in January this year outlined in various clauses of their report that they were satisfied the proposals at that time did satisfy re-provisioning, but they neglected to address certain other important aspects of the proposal's shortcomings. Furthermore, several of the statements they used to inform Committee were either incorrect or did not take into account important factors which mean that re-provisioning is certainly not provided in quantum, quality and openness as is required - it is a cumulative test. This summary seeks to highlight why the revised and enlarged development now out for consultation is even more deficient in terms of complying with policy related to re-provisioning.

The changes made to the scheme since January simply make matters worse, with changes to the layout and increases in height of all but three buildings and consequent negative impact on the open spaces between and surrounded by these higher buildings. Increases in height which do not comply with the Adopted Planning Brief.

We set out in this document how the original planning submission and Officers' Report to Committee misrepresented details related to the new open spaces and also why the latest revised and enlarged scheme still does not comply with Policy in terms of re-provisioning.

1.1 Current Situation

Currently the grass sports fields in the south west part of the Stag site are protected by OOLTI status and provide a significant open space bounded by Williams Lane and the Lower Richmond Road. There are groups and lines of mature trees on the northern, southern, and eastern boundaries of the sports fields, which are all protected by tree preservation order (TPOs), and a pavilion sits in the south east corner of the fields.

The space is valued as a flexible recreational space and is used for football with two pitches aligned west/east. The grounds were also used heavily in the past for cricket matches, mostly organised by the brewery, being the only area in Mortlake large enough to accommodate a cricket oval. The space also performs an important function for local community fairs and primary schools' recreation use, sports activities and school sports days.

Although private land, the Planning Brief Adopted in 2011 makes it completely clear that the sports fields are to be retained and increased use will be encouraged. The new site owners and their development partners were fully aware of this at the time of purchase from the brewery.

The Planning Brief is a supplementary planning document (i.e. a material planning consideration). It provides that "*The Council will seek the retention of the two football pitches/one cricket pitch for increased public use (DM OS8)*" It also provided that the playing

fields should be retained in their present location, and be made more accessible for public use.

The sports fields also perform an important role as a large green open space. The only other such local green spaces are much smaller: Mortlake Green, Jubilee Gardens, and Tapestry Court. It should also be noted that only 4 years prior to acquisition of the site by the applicant the Bowling Greens, approximately a sixth of Mortlake's green space immediately adjacent the site, were removed to support residential development. The latest proposed loss of natural green leisure space cannot be considered in isolation. The cumulative effect would be even more significant to the local environment.

The sports fields provide a valuable visual amenity for the local residents in Williams Lane, Wadham Mews and along the Lower Richmond Road, and indeed a valuable asset of the wider community. LBRuT's 'All in One' surveys showed local residents valued such space above all other local priorities, stating:

*“Overwhelmingly, parks and open spaces were considered to be **the most important aspect** in making your area a good place to live.”*

This is a major factor why 91% of respondents to the application under consideration did not support the removal of two grass playing fields, assets which they treasure.

This large open space also provides an important 'townscape' contribution to Mortlake with long vistas as one enters or leaves Mortlake on the Lower Richmond Road. Hence the 'T' in OOLTI and the recognition of this aspect in its original designation by the Council.

The sports fields measure 2.2ha in total area. Excluding the footprint of the pavilion, access and car parking, the remaining green open space measures 1.95ha.

1.2 Early Design Options & Public Consultation

Although the Planning Brief required a new primary school to be located on the Stag site, north of the sports fields, the local authority revised this requirement in late 2015 and now require a new 1150 student secondary school with 6th.Form.

Early design options tabled by the developer consistently illustrated the school on the sports fields, initially with other residential accommodation. We have always stated that, if a school is proven to be required, then this 21 acre Stag site is adequate to accommodate it, retain the sports fields, and still provide a very significant mixed use development.

After public consultations and strong objections to the initial designs various alternative schemes were proposed positioning the school itself in different parts of the site. However, no effort was made to explore options which complied with the planning brief and retained the sports fields for both school and public use (see design options on Pgs 104-105 of the Planning Officers' Report to Planning Committee).

The developer's planning reports present their proposals in a manner which puts a 3G pitch on a brownfield development site. Their plan is to tear up two perfectly good existing grass pitches, (NOT brownfield), which offer multiple existing benefits (we will cover later), including ecological, and which represent a key part of Mortlake's fabric. They replace them with a plastic pitch of smaller size with many more access restrictions than the SPG intended - fenced and in the school's secure grounds, and with access consequently limited for the public.

At the Public Examination into the Local Plan, the planning authority proposed a policy amendment to the Site Allocation for the Stag site (SA 25). This intended to open the opportunity to “re-provision” OOLTI space elsewhere on the site, subject to providing equivalent “quantum, quality and openness”. The local community objected strongly to this proposed policy amendment because it was seen as a clear case of watering down of earlier policy and carefully considered designation, and protection as OOLTI space. A specific protected space, for all the reasons described above, suddenly became un-important to LBRuT- and it could be moved, but what of its original ‘townscape’ importance?

The amendment was finally upheld by the Inspector. The community felt betrayed by the local authority who seemed more intent on providing a route for the developer to ignore the original importance they had placed on the sports fields, and OOLTI designation, simply to accommodate a new large school they purported to need, despite that need being strongly challenged by local parents and the wider community.

The original test for re-provision - including when protection was granted - was more stringent, requiring that the new open area be *‘equivalent or improved in terms of size, shape, location, quality and potential ecological value’*.

These tests do not wholly marry up with London Plan requirements for Policy 7.18 Protection of open space and addressing deficiencies. *“The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the catchment area. Replacement of one type of open space with another is unacceptable unless an up-to-date needs assessment shows this would be appropriate.”*

This is a key planning point and strengthens our case that the scheme fails in this respect.

In further public consultations on the emerging designs no attempt was made by the developer to explore layouts which kept the sports fields.

1.3 Planning Brief and Green Open Space

The Adopted Planning Brief requires the retention of the OOLTI designated sports fields (2.2ha) and the creation of a new Green Link between Mortlake Green and the River Thames (0.69ha - as illustrated on Appendix 1 of the Planning Brief).

This creates a total ‘base line area’ of 2.89ha of open space to be provided in any scheme, and any re-provisioning of the OOLTI needs to be 2.2ha (22,000sqm).

However, to deliver a high quality redevelopment scheme to match the Vision for the site and the London Plan, any proposed design would naturally also require additional attractive open space between the buildings, plus the provision of recreation and play space.

Even assuming modest calculations, that additional public open space ought to total in the order of 30-35% of the remaining site, i.e. total site ownership 8.20 Ha (this is the ownership area - the application red line extends beyond) - minus baseline ‘non-developable’ areas of 2.89ha (OOLTI & Green Link) = 5.31 ha x say 35% = 1.86ha).

Consequently the total open space on the whole site ought to comprise in the order of 4.75 ha as an absolute minimum (circa 58% of the whole site) and this excludes land required for roads, footways, cycle routes and other hard surface areas. The remainder being available footprint area for buildings.

Even using the figures used in the Planning Officers' report to Committee the proposals still fall well short of this requirement by virtue of the cumulative development density of the design.

The applicant is compelled to demonstrate - in a manner it has clearly not yet satisfactorily done - how the combined planning requirements have been met: the requirement to deliver appropriate green, open, leisure space of a satisfactory level for a new development must be additional to the requirements of re-provisioning, otherwise this would be in breach of the OOLTI protection afforded.

1.4 Planning Applications A & B - Officer Report to Committee - OOLTI Re-provisioning

The two planning applications A&B involve the loss of the OOLTI protected sports fields and the loss of almost all the TPO protected mature trees to the north and east boundaries of the sports fields.

A full sized, artificial surface all-weather MUGA is located on the fields which is surrounded by high fencing, will be screened by acoustic treatment to deal with noise issues, and will be floodlit by tall mast artificial lighting, which is higher than all surrounding buildings. The MUGA is proposed to be used up to 21.00hrs, which is required to justify usage criteria but otherwise entirely inappropriate in this sub-urban environment so close to existing homes. A small community park is left as a small residue of land just north of the Lower Richmond Road with a land reserve for TfL for a new bus depot in the south west corner of the site. Our assessment (MBCG's Analysis Plan - Landscape Areas - previously submitted with letters to the GLA) clearly shows that the Application A&B sites only provide 25% genuine open landscape space - IN TOTAL!! - (see diagram 7.1.142 Pg 107). The data which was presented to the Committee is flawed and misleading despite this repeatedly being highlighted to officers by MBCG.

1.4.1 OOLTI Re-provisioning - Quantum

Here we will first deal with statements made in the Planning Officers' Report to the Planning Committee this January related to re-provisioning in terms of Quantum. We will also comment on the latest revised and enlarged scheme which is now the subject of this current round of public consultations.

In support of the applications, and recommendations for approval, various statements and assessments are made by the local authority in their Officers' Report to Committee (29.01.20).

These are not 'balanced, impartial' statements or assessments. A number of these are either incorrect statements or mis-represent the adequacy, quality and openness of the proposed re-provisioning of the OOLTI areas.

- The Officers' Report (Pg67 - 7.1.10), quotes that the, "Planning Brief recognised that some loss of the playing fields would be required for the primary school" - this is totally incorrect and misleading. First the Planning Brief very specifically calls for the retention of the OOLTI sports fields and encourages greater use for the community (see SPG Clauses 2.43 / 5.38). Secondly the primary school was located on land to the north of the playing fields as clearly shown on Appendix 1 - Plan 1- Council's Vision - in the Planning Brief (also shown on Pg 29 of the Officers' Report).
- The Officers' Report (Pg 109 - 7.1.146) plays down the quality of the Sports Fields as "grassland; with no specific landscape features." This is incorrect and neglects to point out here that there are TPO protected mature trees all around the north, south and east boundaries. This point is however covered later in the Officers' Report - (TPOs) - and

justifies the loss of existing protected trees by the planting of new trees on and around the school/MUGA (see Pg 139 - 7.4.10). This also contradicts and undermines their own original decision as the local authority to classify this space as OOLTI and TPO the trees.

- The Report illustrates eight open spaces which are proposed as part of the OOLTI re-provisioning. (Pgs 108/109 - 7.1.144). We strongly contest the inclusion of several of these spaces as meaningful re-provisioning. They do not satisfy policy in terms of quantum, quality or openness.
- The eight areas are detailed as follows:
 - Bottleworks Square.....883 sqm. This is totally surfaced in hard paving and cannot be compared in terms of quality. It is also surrounded by built form which means a large proportion of the square is in shadow and below BRE guidelines. This is a public space but its design cannot qualify it as a quantum contribution to re-provisioning a 2.2ha sports field.
 - Maltings Plaza.....1,131sqm. This is a genuine public space despite being largely hard paved, and constitutes the northern end of the Green Link. The Green Link is a fixed requirement of the Planning Brief - additional to the OOLTI space.
 - Courtyard Gardens - Bldgs 18/19....2,041sqm. - This space is surrounded by built form of 4 to 6 floors and consequently over 50% is in shadow and below BRE guidelines. The nature of the massing makes the space feel private in nature, and does not contribute to broader community use compared to the existing sports fields. In the more recent revised scheme the massing is amended but much of the space remains semi-private, will need to contain dedicated play space and will still remain significantly in shadow.
 - Courtyard - Bldgs 11/12204sqm - This is so small a space it can hardly be considered as re-provisioning. The whole space is over-shadowed and below BRE guidelines. The enlarged 2020 scheme puts the space further in shadow by virtue of the increased height of the surrounding buildings up to 8 floors.
 - Courtyard - Bldgs 2/3.....667sqm - Much of this space is also in shadow and below BRE guidelines. It is also semi-private in feel surrounded on all sides by tall buildings which have now increased to up to 10 floors.
 - Courtyard - Bldgs 7/8678sqm - 76% of this space is in shadow and below BRE guidelines. Again it is surrounded by tall buildings, now increased up to 8 floors and, being elevated above the towpath, has a semi-private character.
 - Community Park4,117sqm - The Officers' Report neglects to state that a large proportion of this space is dedicated as TfL reserve for a new bus depot and cannot therefore be considered. The area is thus reduced to 2787sqm.
 - School Open Space13,641sqm - This is a mis-representation of re-provisioning as most of the space is fenced off and part of the school's secure grounds. Much of the space will be exclusive to the school and could only be used by the community for part of the time. This is in direct conflict with the SPG and Policy. Furthermore the MUGA areas which are the majority of this space will be surrounded by high fencing, and to mitigate against noise the draft planning conditions dictate the use of acoustic screening around the MUGAs. Tall floodlighting is also proposed. We strongly contest the inclusion of the school's grounds as part of any re-provisioning.

The Officers' Report also highlights other areas which might be viewed as re-provisioning in terms of quantum (see 7.1.142 Pg 107). This includes roadside tree avenue areas, small residues of infrastructure areas and the private gardens of the townhouses in the north west area of the site. Officers have correctly excluded some of these areas from the evaluation of re-provisioning, as well as dedicated play space. The latest revised and enlarged scheme now requires greater dedicated play area thus eroding the so-called re-provisioning. The remainder of the Green Link - south of Maltings Square is identified as 1370sqm.

We strongly contest the LBRuT Officers' Report advising Committee that the planning applications for A & B re-provision the OOLTI space in terms of quantum, and calculate the total genuine space provided can be summarised as follows:

Bottleworks Square	883 sqm	- (but all hard areas)
Maltings Plaza.....	1,131	- (mostly hard areas)
Community Park.....	2,787	
Green Link -South.....	1,370	
<hr/>		
TOTAL	6,171 sqm	

Even if one took a generous interpretation and added the courtyard spaces listed above between Buildings 2/3, 7/8, 11/12 & 18/19 (i.e. 6,298sqm) then the total open space would still only amount to 12,469 sqm. This compares with the existing OOLTI red line area of 2.2ha (22,000sqm).

If one removes the areas of the Maltings Plaza and Green Link South from the above because these were meant to be provided as the Green Link in any case in the SPG, then the comparison is even worse (i.e. 12,469 sqm minus 1,131 and 1,370 = 9,968 sqm compared to existing sports fields of 22,000sqm).

So even by this more 'generous' interpretation, which includes the courtyard spaces between buildings, then the re-provisioning is less than 50% of the existing OOLTI space. Furthermore the 40% increase in residential unit numbers with the revised and enlarged scheme means there is a requirement for significantly more dedicated play space (7,520 sqm), thus reducing the open space put forward as re-provisioning.

We conclude that the proposals do not comply with Policy in terms of re-provisioning in terms of Quantum, nor comply with the SPG or Site Allocation SA25, or the London Plan. We disagree in the strongest terms with the statement in the Officers' Report (Pg 107 - 7.1.142)

1.4.2 OOLTI Re-provisioning - Quality

Here we deal with the aspect of Quality. We strongly disagree with the earlier statements made in the Planning Officers' report to Committee related to Quality; and the latest revised and enlarged design proposals only serve to further impact negatively on the quality of many of the open spaces in the scheme.

Many of the factors in the evaluation of quantum also relate to an evaluation of quality, and whether spaces can be considered as comparable with the quality of the existing OOLTI sports fields. It is important to highlight that the SPG did not just expect the retention of the sports fields but also required enhancement and greater use. The sports fields were intended for public use but none of the spaces proposed in the latest scheme can provide even equivalent, never mind enhanced, use when compared with the expanse of the existing grass pitches which can accommodate so many uses.

- Many of the spaces proposed as re-provisioning are over-shadowed to such an extent that they do not comply with BRE guidelines. Some are significantly below standard for sunlight/daylight penetration and many of the spaces are affected badly by the increase in building heights throughout the design. This is particularly the case in some of the smaller spaces surrounded by buildings of 6/7/8 floors.

- At least two of the spaces are almost exclusively hard paved and not green open space and simply cannot compare or re-provision the existing large grass sports fields by any stretch of the imagination.
- Crucially the spaces proposed are fragmented and spread widely across the various phases of development and cannot equate to the quality of such a large single, open existing space. The original OOLTI designation was in part due to the quality and usefulness of the sports fields. A collection of smaller less useful, and non-comparable spaces can in no way create a comparable OOLTI type of space.
- The townhouse gardens for the new Block 22 are completely private.
- Three of the spaces in the eastern zone of the site are quoted as semi-private open space - (Officers' Report Pg 121 - 7.2.41) and the space between Blocks 18/19 to the NW of the site will also be semi-private by nature of the layout, even with the revised layout. They are directly overlooked by residential properties and will become more 'private' after occupation. Those to the east, Courtyards 7/8 & 11/12, are elevated above the towpath route which will make them feel even more private, not inviting.
- The MUGAs are artificial plastic surfaces and represent an 'urbanised' character and quality being surrounded by tall fencing which is also faced with acoustic screening and lit by tall floodlighting masts around the perimeter. Lighting design must avoid negative impact of light spillage but it remains that the space is floodlit and thus a negative feature to the 'townscape' and adjacent residents. The MUGAs cannot be considered as re-provisioning in terms of quality.
- No doubt some of the spaces will provide a mix of landscape treatment which is potentially more varied than the existing sports fields, but setting aside re-provisioning, any scheme would have required such treatment to comply more generally with the Vision in the SPG, Local Plan Policy, the London Plan and National Planning Policy.
- The Officers' Report -(Pg 109 -7.1.146) suggests that these spaces will create areas "potentially delivering greater benefits to the wider community" - than the existing OOLTI. This is definitely a total mis-representation as many of the spaces will become or will be semi-private and most will contain dedicated play space which must be discounted from any re-provisioning status.
- Furthermore many of the spaces between buildings would have had to be provided in any case to create a plausible Master Plan and to meet daylight/sunlight standards and good design standards set by the Authority and the London Plan - however they are also proposed as space to meet the re-provisioning. (i.e.: there is misleading double-counting here as explained earlier).
- There is also the issue of timescale for any re-provisioning. This development will probably take at least 10 years to complete. Early phases will deliver very little open space but the sports fields will be destroyed immediately with the early construction of the Secondary school and MUGAs.
- The existing sports fields are proposed to be retained in the SPG and the Vision for the site encouraged greater public use. The proposals force any football games on grass to be re-located elsewhere, and there is no space created as re-provisioning which will be able to accommodate, cricket, large community fairs and sports/recreation for the local primary schools.
- The assessment of quality must also take into account the 'townscape' aspect of the existing OOLTI designation. The existing sports fields create a single large space with attractive vistas for local residents and also from the local roads and approach/egress into and out of Mortlake. This is simply not re-provisioned with a collection of smaller spaces surrounded by buildings.
- The Green Link does not do this either as this was a clear **additional** requirement of the SPG.

We conclude that the latest design proposals are totally deficient in re-provisioning the existing OOLTI sports fields in terms of - Quality

1.4.3 OOLTI Re-provisioning - Openness

It is laughable to consider the proposed re-provisioning as comparable in terms of Openness. All the open spaces which have been created are so much smaller than the existing OOLTI space and are surrounded on most sides by buildings. In the revised and enlarged scheme the building heights are increased, in places by three floors, and are thus by composition nowhere near as open as the existing sports fields.

The existing OOLTI space is a large open area of 2.20Ha, measuring some 185m x 140m in overall size, with wide, open vistas into the space from the north, south and west. It is the most significant single, open space in Mortlake.

Mortlake Green comprises a range of compartmentalised spaces, separated by play areas, tree lines, changes of level, mounding, shrub planting and pathways. Jubilee Gardens is much smaller in scale, and Tapestry Court is a tiny pocket-park space.

- The OOLTI sports fields measure 19,470 sqm in size and openness as one single space - this excludes the pavilion and parking areas which are nevertheless within the red line boundary of the OOLTI designation of 2.2 ha (22,000 sqm).
- The largest open space proposed in the Stag site re-development measures just 2,787sqm - the Community Park - just a tenth of the size of the existing sports fields. The TfL bus reserve cannot be included as this is ear-marked for a bus route facility.
- The proposed re-provisioning spaces are fragmented and spread across the whole site.
- The only green, truly open space in the scheme is the area between Blocks 2 and 7 - the Maltings Plaza, and the space which extends southwards forming the Green Link with Mortlake Green. However, this was a prerequisite of any submission. The Planning Brief for the site requires the Green Link - and the OOLTI sports fields. This is a fundamental point which LBRuT chose to ignore when the scheme was put to Committee.
- Because the recreation space within the school site's secure fence line falls seriously below DfE recommendations for the size for secondary schools (i.e. just 30% of DfE Guidelines BB103), there is a serious risk that the Community Park will in fact become a substitute outdoor recreation space for students, further eroding the Park's proposed public use. There is genuine fear the same may happen to Mortlake Green which is already used by Thomson House Primary School due to their lack of adequate outdoor recreation space on their two sites either side of the level crossing.
- None of the new spaces are of sufficient openness to compare with the sports fields. None could accommodate cricket or large community fairs, or school sports days as the fields have done over many years. Nor could they perform the recent public usage during Covid-19 lockdown, albeit by the owner's consent, providing a large open space which allows social distancing.
- Cricket has been almost ignored. This was referenced in the Planning Brief - Clause 2.42. If the existing sports fields were retained as envisaged this could add a minimum of 78 further FULL DAYS use of the grounds - April to Sept, practice games, and cricket nets etc, and further encourage another sport locally - not just football/hockey.
- The SPG Vision seeks greater use of the existing sports fields. The potential for cricket continuing on the existing OOLTI sports fields would be lost forever in the current development proposals. This is at a time when the ECB is trying to foster the sport and hold on to precious cricket grounds. The ECB have written to us supporting the retention

of the sports fields (see letter in Appendix C), as did the England cricket legend Bob Willis who lived in Mortlake before his sad death last year (see letter in Appendix D).

- Positioning the secondary school on the sports fields has led to the developer having to allocate significant 106 Agreement funds to re-locate Barnes Eagles FC to other facilities (£136,125 minimum). These funds would not be required with the retention of the sports fields and could be better allocated for positive new uses or continued maintenance of the existing sports fields.
- There are serious questions whether a new secondary school is indeed required, and this is covered in other representations. If proven to be necessary however, one could still question why the proposed main MUGA has to be a full size adult pitch. Richmond Council, the DfE and Sport England have approved a smaller but still compliant MUGA on the Turing House scheme, and retained the adjacent grass sports fields (see DfE BB103 - smaller compliant MUGA - 60m x 33m, plus margins, for secondary schools). This approach would allow at least retention of the existing sports fields. Sport England have only assessed what they have been presented with - a full size MUGA which obliterates the OOLTI.
- With the retention of the existing sports fields the contributions to works on Mortlake Green (£145,344) may not be necessary and again could be allocated for positive new open space/ sports uses on the site itself.
- Thomson House and St.Mary Magdalen's primary schools use the existing sports fields as they have no green space of their own and until now relied on the agreement of the brewery and now the applicant to use the grounds for sports and recreation use (the SPG envisaged this continued use). The negative impact on primary schools needs to be taken into account in this respect with the loss of the sports fields.
- The applicant has argued their case for removal of the sports fields through greater usage with the artificial 3G MUGA. Sport Richmond and indeed most professional football and rugby clubs support the use of reinforced grass pitches. They are a proven system which gives longer life and greater usage whilst retaining the natural and ecological features of natural grass. This concept would retain quantum, quality and openness - and indeed improve and enhance these precious fields and open space. Maintenance costs of these surfaces is not a constraint as noted on the points above.

1.5. Conclusion

In summary we show quite clearly that the proposed case for re-provisioning is disproven on so many individual counts for all three conditions required to meet policy.

Any scheme is required to provide the OOLTI sports fields AND the Green Link. It would also need to provide other significant open space to create a redevelopment scheme of this type and intended high quality and Vision.

Applications A&B fail in this regard. They also fail woefully to provide open recreation and break-out space to meet DfE recommendations for the proposed super-size new secondary school.

This all stems from an excessively dense, over-developed scheme, which contrary to the current and emerging London Plans does not respect the character of the local environment. The applications propose an 'urban' solution, completely out of character with this low-density, sub-urban community on a site which is so geographically constrained by the River Thames and the railway.

The applications should be refused and the design re-imagined.

Appendix C
Representations from
Bob Willis
and
the England and Wales Cricket Board

To: The Leader of the Council

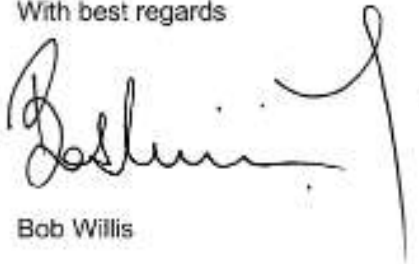
From: Bob Willis

Date: 23 08 2019

Mortlake Brewery Redevelopment – loss of the cricket square

I am a resident of Mortlake and a former Captain of the England Cricket Team. I am writing to say that, if a secondary school for 1,150 pupils is to be located on the Brewery site, then I am disappointed to see it equipped with just a single all-weather pitch in place of the existing two grass pitches and cricket square. The Council seems to be taking the view that the cricket square is not needed as the sport is in decline. Far from it - England has won the World Cup this year and women are now showing a lot more interest in the sport than ever before. I must urge the Council to retain this open space intact and upgrade the grass so that it can sustain more use than at present. An open space for cricket as well as other sport is a must, both for the secondary school and the local community. And natural grass, as opposed to an all-weather surface, is a huge asset both visually and ecologically. The Council is making a big mistake in removing this asset and will risk losing many votes.

With best regards

A handwritten signature in black ink, appearing to read 'Bob Willis', with a long, sweeping flourish extending upwards and to the right.

Bob Willis



Tom Harrison
Chief Executive Officer

TWH/ijh/19-20

7 May 2020

To Whom it May Concern

Mortlake's Pitch for local Cricketing Hero

On behalf of the England and Wales Cricket Board (ECB), I write to endorse the above campaign and its efforts to ensure that cricket is thriving on the Mortlake/ Stag Brewery site.

Whilst the cricket square has not been in use since 2003, there is significant local need to bring the square back into use for local sides, at both junior and senior levels. Despite Richmond being a "green" borough, there is limited green space in Mortlake and therefore it is vital that this space is protected for community sport.

Last year, we launched our five-year strategy, *Inspiring Generations*, to grow cricket across our communities and give more people from diverse backgrounds opportunities to play our great game. Our ambition remains unchanged and key to delivering this plan is working with local authorities and key stakeholders to ensure that men, women, boys and girls - regardless of their economic status - have the opportunity to play cricket.

Losing cricket on the Mortlake/ Stag Brewery site would significantly impact the scale of opportunities for local people in the area to play cricket, and once lost, is extremely difficult to bring back. I therefore strongly urge that a long-term view is taken on the development of the site to ensure the physical activity needs of the local community are not forsaken.

Not only would bringing the site back into use for cricket represent a fitting tribute to the legacy of the late and truly great man of cricket that was Bob Willis MBE, it is needed now more than ever as we emerge from the COVID-19 crisis. We need to preserve and protect our outdoor spaces, particularly for those from disadvantaged backgrounds in urban areas who don't have the luxury of their own gardens to undertake physical activity.

Yours faithfully,

Tom Harrison
Chief Executive Officer

Appendix D
Design and Heritage
Considerations

STAG BREWERY, MORTLAKE.

18/0547/FUL

Response to the revised scheme (July 2020) and call-in by the Mayor.

DESIGN AND HERITAGE CONSIDERATIONS

Key findings

- The increased scale, mass and height of the revised scheme has a greater detrimental impact on the setting of the heritage assets than the previous schemes, constituting 'less than substantial harm';
- The Revised Scheme fails to meet the policy and guidance set out in NPPF section 12;
- No consideration is given to the Government's *National Design Guide* (October 2019);
- The Government-advised vehicle of the Design Review Panel has not been used;
- The Government's *Planning Practice Guidance* (July 2019) and Historic England's *Setting of Heritage Assets* (2017) do not appear to be used.

1 Introduction

1.1 There are two principal issues to consider:

- a) design and conservation policy and guidance
- b) impact of the revised scheme on the buried archaeology, the built heritage and townscape.

2 Background - Heritage Assets and Conservation Areas

2.1 The development site is bounded to the west, east and south-east by **Mortlake Conservation Area** (LBRUT No. 33), which includes the river frontage from Chiswick Bridge to White Hart Lane. Significantly it extends into the brewery site to include the maltings building, and on Mortlake High Street to include the former hotel and bottling building. It includes the grid of streets and narrow passages south-west of the parish church, of generally two to three storey houses. The historic core of the CA is focused round St Mary's parish church (listed Grade II*) with many fine 18th century listed houses on the High Street and the riverside upstream from the Maltings Building (Thames Bank).

2.2 Within it are thirteen statutorily listed buildings and structures. Significant to this application are the group of five, two- to three storey 18th and 19th century Grade II-listed houses and their boundary walls on Thames Bank, and Grade II-listed Chiswick Bridge. Additionally, Buildings of Townscape Merit (BTMs), that is locally listed buildings, include the Ship Inn, and importantly the maltings building, and the former hotel and bottling building.

2.3 The Conservation Area (CA) was designated in 1982 and last extended in 2018 to include residential streets and byways to the south of the High Street.

2.4 To the south of the brewery site, **Mortlake Green Conservation Area** (LBRUT No. 51), covers Mortlake Green and buildings lining the east side of Sheen Lane north of the railway. It extends west to include Rosemary Gardens, Rosemary Lane and Waldeck Road and buildings lining the south side of Lower Mortlake Road, and prominently the Jolly Gardeners public house at the gateway to the development. It is an area of late Victorian and Edwardian buildings which have an identifiable industrial character although many are different in style, with Building heights ranging from two to five storeys.

2.5 While there are no statutorily listed buildings in the CA, BTMs include the Jolly Gardeners PH, Rosemary Gardens, Woodbine Cottage and Eton Lodge, and terrace of mid-19th century houses fronting Lower Mortlake Road.

2.6 The Conservation Area was designated in 1988 and last extended, to include the railway line and Mortlake Station, in 1998.

2.7 The site lies within **Mortlake and Barnes Archaeological Priority Area**. Although the site is not designated a scheduled monument, it is important and considered to have archaeological potential for the medieval archbishop's palace, its service buildings, church and graveyard to the east of Ship Lane, and the site of Cromwell House, predominantly a post-medieval house and its service buildings to the east of Williams Lane and north of the playing field. Additionally there is potential for evidence related to brewing from the post-medieval to modern periods.

2.8 Outside the CAs, a gateway said to come from the Cromwell House (listed Grade II, NHLE 1417979) is re-sited on Williams Lane and a boundary wall (listed Grade II, NHLE 1261445) said to be associated with Cromwell House continues south-west from Riverside House (within the CA), forming the boundary between the brewery site and Reid Court, built as local authority housing.

2.9 A desk-based archaeological assessment of the site by CgMs (2017, updated March 2020) sets out the history of the site in the context of the area, supported by map regression and by a site evaluation by PCA in 2016. Evaluation trenches and pits identified the presence of medieval structures, artefacts and land surfaces east of Ship Lane and post-medieval structures and occupation to the west. National, GLA and local authority policy is set out but the strategy and timeframe for phased site recording and excavation prior to development are yet to be secured within the planning conditions.

3 Design policy and guidance – urban design and townscape assessment

3.1 The Revised Scheme (2020) is an escalation in the mass, scale and height of the earlier proposals, which themselves were considered to fail to satisfy the clauses of national and local policy and guidance on the historic environment (Heritage Information, letter to MESS 15 July 2019).

3.2 Gerald Eve (July 2020, 10 Design and Layout, p 51 ff) suggests that the Revised Scheme is consistent with GLA guidance on high quality design, citing in particular Draft Policy D4, which requires that schemes of over 350 residential units/ha or a tall building should undergo at least one design review. They acknowledge that the scheme has not undergone formal design review by a Design Review Panel, adding however that the revised scheme is the result of a significant period of pre- and post- submission consultation with the LPA and GLA (ibid, 10.2-3, p 51).

3.3 Section 12 of the NPPF strongly encourages the use of tools such as Design Review Panels in order to assess and improve the design of development by both applicants and local authorities, particularly for large-scale developments such as that being proposed on the Stag Brewery site (paragraph 129 Although the LBRUT Design Review Panel was set up after the date of the first

application for the site, it is a process that was encouraged under previous iterations of the NPPF (2012), yet the proposals still have not been subject to such independent scrutiny. Given the recently amended proposals to increase the height of a number of blocks, this is an opportune moment to engage with the design review process.

3.4 Since the original application was submitted, the Government published its National Design Guide (NDG) in October 2019. This document was drafted by the Ministry of Housing, Communities and Local Government as the national planning practice guidance for 'beautiful, enduring and successful places'.

3.5 The NDG states that the components for good design are: the layout (or masterplan); the form and scale of buildings; their appearance; landscape; materials; and their detailing. The NDG focuses on what it terms the 'ten characteristics', the first two of which are particularly relevant to this scheme: Context and Identity.

3.6 This national guidance supports the national and local planning policy in relation to good design, specifically Policy LP 1 of the Richmond-upon-Thames Local Plan which demands that developments must be compatible with the local character and relationship to existing townscape in terms of local grain, scale, density, proportions and massing.

3.7 This requirement follows that of Paragraph 127 of the NPPF, which states that developments should be sympathetic to local character and history, and establish or maintain a strong sense of place.

3.8 While Gerald Eve reiterates the Revised Scheme's deliverance of 'well-considered and high quality architecture' (2020, 10.5), as set out in Squire + Partners' D&A Statement Addendum and Design Code (July 2020), the documentation makes no reference to the NDG. It is difficult to justify the proposals in relation to Context and Identity, particularly given the increase in the height of a number of the blocks, which are entirely out of keeping with the local typologies, density and scale; with the statutorily and locally listed buildings; and with the character of the area, where the prevailing heights are of two to three and three to five storeys.

3.9 With reference to Characteristics 1 and 2 of the NDG, the proposals do not present a good understanding of the local built form or draw effectively on local architectural precedent. The height, scale and massing of the proposals remain distinctly urban in character and have no relationship with the suburban scale and density which gives Mortlake its distinctive character and appearance, such that the proposed development would fail to integrate successfully into its wider surroundings. Appreciation of the local historic fabric, setting and grain extends, for example, to an acknowledgement of the grid of narrow streets of Mortlake as a determinant of scale (Design Addendum, March 2019, p 63) and as a design cue, yet in their scale and typology (Design Addendum and Design Code, 2020), the proposals retain the sense of walled enclosure currently present in the brewery site and exacerbate this in increasing the height of the High Street frontages. The original, relatively quiet design for the cinema is complicated by added elevational detail and roof structures that impact on the setting of the Jolly Gardeners public house.

3.10 The mansion block typology which forms a major part of the riverside area of the development is atypical of Mortlake. Geographically, it is generally an urban, inner London type. Indeed, the Design and Access Statement makes clear references to riverside mansions further up the River at Putney and Fulham. While there are a few five-storey flatted blocks on Mortlake High Street, dense, tall developments are not typical of the built environment of Mortlake – its character or appearance. The closest riverside comparators are at Castlenau and Elm Bank Gardens, Barnes and

Twickenham, adjacent to Richmond Bridge, in small developments of five storeys and attics at most. Comparison is also made with Whittaker Avenue, Richmond, part of Quinlan Terry's 1980s scheme, but there again heights are limited to five storeys.

3.11 Gerald Eve notes that 'The Site continues to be a location where tall buildings may be acceptable in planning policy terms' (Gerald Eve, July 2020, 10.16), but acknowledges that the increased heights would go beyond the 'guidelines set out in the Stag Brewery Planning Brief (as per the Original Scheme).' (ibid, 10.15). It claims that 'whilst the Revised Scheme extends beyond the guidelines the heights are entirely in accordance with relevant planning policy as they have been informed by a thorough understanding and appreciation of the site context, taking into account the impact on the surrounding townscape and environment.' (ibid, 10.16). They add, the revised views do not abruptly rise above the level of the adjacent townscape and are very similar to the **existing** buildings on the site. (ibid, 10.12).

3.12 Increased height is justified by Waterman (WIE, July 2020, 4.235) and Gerald Eve (Eve, 2020, 13.10) in a claim that there is precedent in the demolished industrial buildings adjacent to the Maltings building. The photographs produced as evidence (ES Appendix Q) show the site in the 1930s and 1960s.

3.13 We disagree. While tall buildings did exist on a limited frontage of the main site for a period, the photos reveal there were none co-existent with them behind Thames Bank. Indeed an aerial view of the site in 1962 shows open ground immediately to the south of Thames Bank (CgMs, 2020, fig 14). The development cannot on the one hand claim to improve on the industrial site, while using redundant, and indeed purely functional, demolished buildings of little or no architectural or historic merit as design precedent and apply this across the site.

3.14 Waterman and Gerald Eve (WIE, July 2020, 4.276, Gerald Eve, 2020, 13.21 ff) consider that the impact of the revised scheme on townscape character is in accordance with the 2018 assessment (WIE ibid, 4.276) and indeed Original Scheme (Gerald Eve, ibid 13.23), and that the significance of the effect does not change. **We disagree. How can additional storeys, adding 10% to 25% in height, not impact on the character and appearance of the area? We consider this to be an increasingly detrimental impact.**

3.15 Not only does the revised scheme exceed the Original Planning Brief in height, scale and mass, **but the original designs have been adjusted to such an extent that they have lost any original architectural purity and character and response to context and compromise the facilities they aim to provide.**

3.16 It is therefore contestable that the scheme achieves the aims set out in the NPPF (Section 12) and NDG in being appropriate and sympathetic, and in adding benefit to the local area.

4 Conservation policy and guidance - impact on designated heritage assets - statutorily and locally listed buildings (buildings of townscape merit) and Conservation areas

4.1 Waterman Infrastructure and Environment (WIE), consultants on environmental matters relating to the scheme, and Gerald Eve, in summary, reference the updated National Planning Policy Framework (Feb 2019) and policies within the draft new London Plan (July 2019) in justifying the revised scheme.

4.2 Waterman note that since amendments to the scheme of May 2019 there have been no significant changes in policy or legislation relating to archaeology (July 2020, 4.228-30, p 67-8), and

that the reduction in the proposed basement levels to the west of Ship Lane is beneficial to the survival of the archaeology.

4.3 'Since the production of the 2018 ES [Environment Statement] a new version of the NPPF (2019) has been published. This has not changed the conclusions of the 2018 ES (as amended).' (WIE, July 2020, 4.2410, p 8).

4.4 Impact on buildings is assessed in terms of the structure itself and its setting. With reference to national criteria and terminology applied to Environmental Impact Assessments, Waterman compares the impact of the completed development across the 2018 and revised 2020 schemes.

4.5 WIE finds that changes in the conservation plan and detailing of the Maltings Buildings – retaining the fenestration pattern - and former Hotel and Bottling Building- reinstating chimney stacks, retention of internal columns - are in general beneficial to the buildings (WIE, 2020, Table 4.29).

4.6 **However, across ALL the heritage assets – the Conservation Areas, statutorily listed buildings and BTMs, WIE finds in each case that the up-lift in heights is more detrimental to the setting than in previous schemes.** (WIE, 2020, Table 4.29, Table 4.30). ***Significantly, this includes the Maltings Building, the key historic asset on the site, included in the Conservation Area, with a strong and special relationship with the river and with the adjacent buildings on Thames Bank. Yet it is dominated by the new development, which WIE notes, competes with it.*** (ibid, 4.253).

4.7 **Importantly Gerald Eve (July 2020, 13.15) finds that the increased heights affect the Maltings Building (within the context of the Conservation Area) to the extent that, in the terms of the NPPF, this constitutes less than substantial harm. However, they conclude that the public benefits of the scheme will outweigh the less than substantial harm caused to Mortlake Conservation Area (ibid, 13.16). We disagree that the public benefits will outweigh the harm.**

4.8 It is noted that they do not assign a degree of less than substantial harm as outlined in Government's *Planning Practice Guidance* (updated July 2019), which requires an assessment of levels, on a scale of low – medium - high, nor appears to refer to Historic England's *Setting of Heritage Assets* ((2017). ***In this context we suggest that minor adverse impact would equate to low to medium less than substantial harm.***

4.9 The settings of the 18th and 19th century statutorily listed buildings and walls and BTMs on Thames Bank, Chiswick Bridge, the Jolly Gardeners public house, the hotel and bottling building are all adversely impacted in varying degree as result of the up-lift in height. (WIE, ibid, 4.254, Table 4.30). ***The developers may claim that these are offset by mitigation and any claimed overall public benefits of the scheme to the area, but the findings are a stark statement of fact.***

4.10 The revised views do not abruptly rise above the level of the adjacent townscape and are very similar to the existing buildings on the site, (Gerald Eve, 2020, 10.12), while visually taller elements have been located centrally (ibid, 10.11). This is clearly not the case on the river frontage, nor Mortlake High Street, while an increase from three to four storeys is proposed for blocks 20, 21 and 22, in close proximity to the generally two- to three-storey listed buildings and BTMs, and their rear gardens on Thames Bank, all within Mortlake Conservation Area. The LPA had already deemed that Blocks 20 and 21, the earlier iteration, had an unacceptable relationship with properties to the rear due to their very close proximity, hard up against the boundary, overlooking and visual intrusion. (Design Addendum, March 2019, p88).

4.11 In response, the architects stated that the Design Code had been amended to prevent the incorporation of windows on the respective elevations, a policy adopted across the scheme in response to issues of proximity and overlooking. ***Without a detailed application for these blocks it is not clear how the revised scheme will respond, particularly that of overlooking from the north elevations, but the increase in mass and height from three-storey houses to four-storey flats, albeit with a set-back upper storey, their revised positions, and the change to mansion block typology are significant changes, with acknowledged impact.***

4.12 While the detrimental impact of the increased heights on the Jolly Gardeners Public House is acknowledged in the report (WIE, July 2020, Table 4.30), little specific consideration is given to the characterful houses lining the south side of Lower Mortlake Road, many of them BTMs where increases in height are proposed across the road to the north, except to state that the increases in mass, scale and height remove any previous beneficial effect on Mortlake Green Conservation Area (ibid, 4.30). ***These locally listed buildings are not buried deep within the Conservation Areas, they stand at the interface between the existing public realm and the brewery site.***

4.13 The evaluations acknowledge the detrimental impact of the increased heights on Mortlake Conservation Area (WIE, July 2020, Table 4.30; Eve, 2020, 13.11, 13.16), but aside from the setting of the Maltings Building, and the setting of the buildings in the Thames Bank, the impact on the extensive and special riverine section of the Conservation Area is not fully considered.

4.14 Above all, as Waterman acknowledge (WIE, July 2020, 4.254) the revised outline scheme for the western site is not sufficiently developed in detail for its impact to be fully or accurately assessed. ***Moreover, it is considered not usual, and indeed bad practice (and something Historic England would advise against) for impact on the setting of a Conservation Area and listed buildings to be determined on the basis of an outline application. Yet even at outline stage, the impact of the proximity, height and character of the proposed blocks on the Conservation Areas and historic assets is visible.***

5 Conclusion

5.1 The Revised Scheme does not enhance the area as defined by the Local Planning Authority and fails to meet the requirements set out in the NPPF (2019, Section 12), while the National Design Guide (2019) has not been considered. The EIA evaluation shows an increase in detrimental effect on the setting of a number of statutorily and local listed buildings, even those considered key to the development, and of two Conservation Areas, amounting to less than substantial harm. Others are dealing with the issue of public benefit, but positive benefit will need to be proven to outweigh this recognised harm.

5.2 As it stands the Revised Scheme appears not fit for purpose and should be revaluated and re-designed before it can be determined, and at the very least be reviewed by a Design Review Panel.

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Heritage and Design Consultant

Patience Trevor MA
Former Senior Adviser, Historic England, Listing Group.

September 2020
For the Mortlake with East Sheen Society

Key references

GLA planning portal:

Further Addendum to Town Planning Statement, Gerald Eve (July 2020)
July 2020 ES Addendum WIE, Waterman Infrastructure and Environment (July 2020)
ES Appendix Q Built Heritage Supplementary Photos
ES Volume 1 Main Text

Richmond-Upon-Thames planning portal:

Archaeological Desk-Based Assessments, CgMs (Oct 2017, revised March 2020)
Design and Access Statement Addendum, pt 1 & 2, Squire + Partners (July 2020), uploaded August 2020
Design Code, pt 1 & 2, Squire + Partners (July 2020), uploaded August 2020

The response also references: The Stag's Brewery, Lower Richmond Road, Mortlake, London SW14 7ET, Review of Planning Applications Refs: 18/0547/FUL and 18/0548/FUL, Dorian Crone, Heritage Information, letter to MESS (15th July 2019). (Attached).

Appendix E

Analysis of Richmond Council's Forecasting of the Need for Additional Secondary School Places



Analysis of Richmond Council's forecasting of
the need for additional secondary school
places

An introductory paper on a report on the anomalies that
destroy the case for the secondary school on the Stag
Brewery site

1 Introduction

The evidence put forward by Richmond Council to justify the creation of an additional secondary school in the eastern half of the Richmond borough, and specifically on the Stag Brewery site has been reviewed and analysed.

This paper is a summary of findings which are relevant to the GLA as a planning authority on account of the principle of development enunciated in paragraph 62 of the GLA Stage 2 report on Application B (LPA ref: 18/0548/GLA ref: 4172a).

By accepting Richmond Local Authority's forecasts of need², namely that there is growing need for places in both halves of the borough, with additional need in the eastern half growing to five forms of entry by 2021 and more than that by 2025, as well as other claims in that report that are unproven, the Stage 2 report paragraph 62 finds, subject to provisos that will undoubtedly be met, that

- the Council's committee report sets out evidenced justification for the provision of a secondary school, based on existing and projected local demand for school places
- the Council's evidence on the borough's school place demand is accepted and the provision of a secondary school is supported

For some time now the Mortlake Community has been challenging the Local Authority about what they say is "an overwhelming need" for a new secondary school in Mortlake. We have made representations to the Council and the DfE, and seriously questioned the data used to support their case but the Council has failed to engage with our arguments

With regard to the data, it appears that reliance has been placed on the Council's historical record in predicting the need for school places, rather than taking seriously our concerns by interrogating the data and predictions. This "track record" argument has been put to us frequently by both the LA and the DfE.

Given this background, a local educational specialist undertook an investigation into the data underpinning the additional school place demand. The resulting report, which required several FoI requests and complex analysis, provides a thorough and detailed analysis of the Council's data and forecasts. It reveals additional findings to those reported earlier to the Council and the DfE which we draw on in this paper. A summary of the report's findings is contained here – the more detailed analysis can be made available.

The report establishes that the claims of future secondary need have been overstated in the Council's *School Place Planning Strategy December 2019 (SPPS 2019)*, which is the sole evidential basis underpinning the policies and other documents quoted in favour of this school.

It finds that the local authority's returns to the DfE School Capacity Survey are flawed on account of departures from required procedures. The report further shows that, once these procedures are re-instated, the resulting forecasts indicate that there is no case, and never has been a case, for building a new secondary school in this locality.

The report also shows that the building of a new school will damage the two existing local schools both in the short and long terms, as well as having several demonstrable negative local planning impacts. No mitigation of these negative impacts can be sufficient if the new school, instead of being

² Paragraph 7.1.123 in Richmond Council's committee report, 29 January 2020,

of benefit is, as is demonstrated by the report, itself both unnecessary and educationally damaging. There are options to expand these two schools which would meet an increase in school place demand and would help strengthen the viability of their sixth forms.

All this is against a backdrop of a well-documented decrease in the numbers coming through the primary schools.

Since these findings change completely the basis on which the planning application must be judged, we urge the Mayor to examine our arguments and data carefully.

2 Executive Summary

1. It has become Council orthodoxy that to meet an increased demand there is what they describe as an “overwhelming need” for a new secondary school in the eastern half of Richmond borough
2. The case for a new school is based upon faulty statistics
3. We agree that there will be an increase in the demand for secondary school places, but it will be falling by the time a new school can be built
4. We have shown that delay has already compromised the capacity of the existing schools to cope with the shortfalls that will accumulate before any new school can be built
5. If a new school is built in this area without a real need there will be a further negative impact on the ability of the three existing schools to recruit and to ensure the viability of their sixth forms.
6. The faulty statistics in the council’s case have two main causes:
 - In 2017 the local authority changed the method it used to predict secondary school numbers to one which ignored outward migration from year groups as these progress through the Richmond primary schools.
 - In 2015, 2016 and 2017 the local authority omitted to report increases in secondary school capacity made between 2012 and 2014; this omission has the effect of increasing the reported shortfall of secondary school places

Both actions contravene explicit requirements of the DfE.

7. As a result of this departure from the DfE requirements, the local authority forecasted in the School Capacity Survey of 2017:
 - a shortfall in 2021/22 of 298 Year 7 places instead of a surplus of 5 places
 - a shortfall in 2023/24 of 1000 places in Years 7 to 11 instead of a shortfall of zero
8. These forecasts were used as evidence of need when the DfE decided to move the Livingstone Academy East London from Tower Hamlets to Richmond.
9. The most recent forecasts from 2018/19 published locally by the borough identify:
 - a shortfall of 157 Year 7 places in 2025/26, when use of the local authority’s stated methodology would forecast a shortfall of 22 places
10. For the DfE School Capacity Survey, which uses a different metric, the comparisons for 2025/26 are
 - a shortfall of 148 Year 7 places instead of a surplus of 4 places
 - a total shortfall of 599 places across Years 7 to 11 instead of a total shortfall of 173 places
11. If the LA’s own estimates of primary cohorts are used and the LA’s own stated methodology to forecast Year 7 demand is applied, the resulting forecast demand can be accommodated by expanding the existing schools and the case for a new secondary school on the Stag Brewery site collapses.
12. We have demonstrated to the Council how the additional spaces needed could be provided on the sites of two of the existing secondary schools. The planning and funding issues associated with this are not insurmountable.

13. Resulting planning benefits to the development would include:

- the preservation of the OOLTI playing field
- the opportunity to relocate Thomson House Primary School from its present split site either side of the notorious Sheen Lane level crossing, mitigating the acknowledged and already unacceptable dangers of this crossing
- avoidance of increased traffic and danger at the level crossing and on all congested roads caused by students who may be travelling from long distances
- the development's negative impact on traffic, local transport infrastructure and deleterious impact on air quality would be considerably lessened
- an opportunity to increase the amount of affordable housing

14. Allowing the existing schools to expand will mean that they can safeguard the viability of their sixth forms. It will also avoid their having to accommodate up to six additional forms, accumulated during the time before a new school could be built, in demountable classrooms staying on their sites for a period of six years

3 Report Overview

This is a summarised view of the report’s analysis into the data and method used to determine school place demand. It provides:

- background notes on the school proposal and Mortlake Brewery Community Group’s (MBCG) involvement with it
- evidence of a significant overestimation by the local authority of future demand for secondary places
- evidence of an understatement by the local authority of school capacity
- a brief critique of the DfE Local Authority School Places Scorecards
- an example of the DfE’s checking of the local authority’s reporting
- a perspective on the potential for overprovision in the east of the borough

3.1 Background

Richmond Borough Council (LBRuT), after wide consultation with residents, produced a Planning Brief for the Stag Brewery site, which was adopted in 2011. Part of that brief was the stipulation that any development of the site should include a two-form entry primary school.

On 15 October 2015, with no consultation, LBRuT’s Cabinet voted to change the educational requirement on the site from a primary school to a six-form entry secondary school, with a sixth form. This came as a shock to many residents, as there was no evidence locally of a shortage of secondary places. The area is already served by two successful secondary schools, Richmond Park Academy (RPA) and Christ’s (C of E) School, both within a mile and a half of the brewery site.

The justification in 2015 for the new secondary school was based on an estimated increase in numbers of children leaving ten local primary schools and seeking local secondary places. The numbers were said to show a pressing need for a new secondary school in the east of the borough and included the following predictions:

Intake year	Places needed
2019	c.150+
2022	c.250+

These predictions appeared to be exaggerated and concerns were amplified when the shortfall in the east in 2019 in fact turned out to be less than 30: a bulge class provided these places. But as recently as July 2018, a shortfall rising to 345 places by 2023 was being predicted in the borough’s *School Place Planning Strategy February 2018 (SPPS 2018)*.

In June 2018, Mortlake Brewery Community Group (MBCG) demonstrated in a document sent to the Council (*Further comments on the Stag Brewery Planning Applications*) that the main model in *SPPS 2018* was invalid. In August 2018 this model was abruptly dropped by the local authority, without explanation. The revised predictions included a revised shortfall of 142 in 2021.

MBCG believed the revised predictions also were exaggerated and repeatedly sought to engage the local authority in reasoned discussion, without success. The criticisms were characterised as a difference of methodology about which we should have to agree to disagree.

It was further argued that the DfE had accepted the need for the new school and, more recently, that the LA was in the top quarter of local authorities in England for the accuracy of its forecasts in the School Capacity survey returns (SCAP). These were deemed to demonstrate that the LA's forecasts of future secondary need must be reliable. We examine this claim in section 3.4 below.

3.2 Cohort shrinkage in primary schools

Since 2017, the year in which the DfE agreed to provide a secondary school on the Brewery site, the local authority has been making the false assumption that primary cohorts stay, on average, the same size as they progress from Reception to Year 6 (the final year of primary education).

In fact, they shrink, and not by trivial amounts, as is demonstrated in Table 1, which is derived directly from school census data. We show the data for the east of the borough since this is relevant to the recent forecasting of Year 7 demand in the east.

Table 1: Shrinkage of primary cohorts in the east of Richmond

October Census	National Curriculum Year							Year of Yr 7 Entry
	R	1	2	3	4	5	6	
2010	758	739	674	675	610	582	555	2011
2011	804	769	731	657	658	600	562	2012
2012	826	809	767	716	669	650	588	2013
2013	877	833	804	737	703	664	627	2014
2014	941	873	826	778	721	691	661	2015
2015	899	962	882	813	771	711	676	2016
2016	890	904	943	886	795	776	710	2017
2017	879	897	890	909	857	782	766	2018
2018	816	876	885	867	874	833	766	2019
							?	2020
							?	2021
							?	2022
							?	2023
							?	2024
							?	2025

Each coloured diagonal in Table 1 shows the progression of a different Reception cohort as it has advanced through the primary schools. For example, Reception classes across the east of the borough in 2014 contained 941 pupils. Four years later this cohort, by then in Year 4, numbered only 874 – a net reduction, or *shrinkage*, of 67 pupils. Apart from Reception in 2013, every cohort since Reception 2010 has shrunk in every year from Year 1 onwards, and even the exceptional cohort of 2013 shrank by 44 between Reception and Year 5.

Similar patterns can be observed over the borough. Primary cohort shrinkage is an established fact in Richmond. What is more, the LA estimates and shows the extent of this shrinkage in its

SCAP returns. But since SCAP 2017 it has *ignored* this shrinkage when it comes to predicting Year 7 cohorts entering secondary school.

Year 7 demand in 2021, for example, clearly depends on the numbers in Year 6 who will be leaving in July 2021, marked in Table 1 with a question mark in the yellow cell to the left of 'Year of Yr 7 entry' 2021.

Of course, we do not know how many will be leaving Year 6 in 2021, but in SCAP 2018 the LA estimated that number to be 873. This might appear from the table to be an overestimate but in July 2018, when SCAP 2018 was compiled, the local authority did not yet have the October 2018 census, showing that that cohort had already shrunk to 874.

So, 873 was a reasonable estimate. But the LA *did not use* the estimate of 873 to generate the forecast for Year 7 in 2021. It used instead the October 2017 census data for that cohort of 909, as if it would stay the same size through 2018, 2019 and 2020 before finally leaving in July 2021. This seems a contrary approach given that the LA had already estimated that it would shrink from 909 to 873 in its SCAP return.

The census readings in the following year showed that the cohort marked in yellow had shrunk to 874 as seen in Table 1. In SCAP 2019, the local authority quite reasonably estimated that by Year 6 this cohort would have shrunk further to 848. But, when it came to forecasting the resulting Year 7 demand in 2021, it did not use the estimate of 848 for Year 6. It did not even use the reduced October 2018 census of 874. It re-used the October 2017 value of 909. This caused it to forecast precisely the same year 7 shortfall as in the previous year: 142, or nearly five forms.

In SCAP 2019, the LA made forecasts of all primary cohorts from Reception to Year 6 for five future academic years: 2019/20 to 2023/24. Thus, it had done much of the work required to fill in the blanks and the question marks in Table 1. We show the results in Table 2.

Table 2: LA forecasts in SCAP 2019 of primary cohorts for academic years 2019/20 to 2024/25

October Census	National Curriculum Year							Year of Yr 7 Entry
	R	1	2	3	4	5	6	
2010	758	739	674	675	610	582	555	2011
2011	804	769	731	657	658	600	562	2012
2012	826	809	767	716	669	650	588	2013
2013	877	833	804	737	703	664	627	2014
2014	941	873	826	778	721	691	661	2015
2015	899	962	882	813	771	711	676	2016
2016	890	904	943	886	795	776	710	2017
2017	879	897	890	909	857	782	766	2018
2018	816	876	885	867	874	833	766	2019
January 2019	827	862	886	869	879	833	761	2019
Forecast 2019/20		818	858	857	858	864	816	2020
Forecast 2020/21			816	832	846	845	848	2021
Forecast 2021/22				791	822	836	832	2022
Forecast 2022/23					782	810	821	2023
Forecast 2023/24						773	797	2024
Forecast 2024/25							(759)	2025

The forecasts shown were derived from ‘actuals’ in the January 2019 school census, provided by the DfE. (The final entry is an extrapolation.) These differed slightly from the October 2018 census of the same cohorts, as can be seen. The procedure is described in the LA’s stated ‘forecast methodology’, a document which must be submitted to the DfE to accompany each SCAP return. The LA’s forecast methodology for 2019 states

Primary schools:

... Finally, rolls by area are calculated by rolling forward existing year groups and applying average area level retention rates for year group cohorts.

It then goes on:

Secondary schools:

Primary school leavers are forecast using the methodology described above, with school leaver rolls used to estimate the potential demand for secondary intakes by application of a replacement ratio. The projection of secondary school intakes is based on a forecast of the demand from pupils transferring from in-borough schools within two areas of the borough, either side of the River Thames. ...

Thus, we should expect that forecasts of Year 7 cohorts made in SCAP 2019 would be based upon the forecasts of Year 6 cohorts made in the same SCAP. These are shown in the final coloured column of Table 2.

But we have found by checking the numbers that the local authority’s forecasts of Year 7 are not, in practice, based upon forecasts of Year 6. Nor have they been since SCAP 2017, when the local authority stopped following its stated methodology for making such forecasts. This departure was only signalled by a statement in a footnote to a table in *SPPS 2018* saying

“Conversion rates from Reception to year 6 average at 100%” (Our emphasis).

This statement is not correct. Cohort sizes in Richmond can be observed in Table 2 to have declined as they progress from Reception to year 6 by an average of 6.3% for the cohorts of 2010 to 2013. The LA predicted in SCAP 2019 that the next four cohorts, those of 2014 to 2017, would decline by an average of 8.6%. So, the LA was predicting an *increase* in the average rate of decline over the next four years. However, the assumption since 2017 of a 100% “conversion rate” every year – in other words no decline from year to year - has been used by the LA to substitute significantly larger numbers from which to forecast secondary demand.

So, the main points to keep in mind in the context of Year 7 forecasting are as follows:

1. Primary cohort shrinkage in Richmond is a fact.
2. The LA estimates this shrinkage in SCAP to forecast primary cohorts for five future years.
3. This agrees with the LA’s stated forecast methodology and with DfE guidance.
4. Since SCAP 2017, the LA has not used its forecasts of Year 6 cohorts to produce forecasts of Year 7.
5. Instead, it has used raw census results for the cohorts as they were when they were counted.

6. This contravenes DfE guidance and is contrary to what the LA says is its methodology in the SCAP return.
7. It has the effect of systematically overestimating Year 7 demand, typically by larger amounts for later forecasts than for earlier ones.

As a result, the LA has forecast secondary shortfalls in the east of the borough, the area including Mortlake, of five forms of entry by 2021 and more than that by 2025. However, application of the methodology it claims to the DfE to be using would forecast a shortage of only three forms of entry by 2021 and less than one form of entry by 2025. Both could be catered for by an expansion of the existing schools.

3.3 Reporting of School Capacities, and the Link to Shortfall

The DfE is clear about the accuracy it expects in the reporting of capacity by local authorities.

Despite precise and emphatic instructions in DfE guidance, the LA failed to ensure the prompt and accurate reporting of:

- most of the sixth-form capacity it had provided in five schools for opening in 2014/15
- existing sixth-form capacity at Hampton Academy

It may appear at first sight that failure to report additional sixth-form space should not affect places available for admitting Year 7 pupils. But it is important, for two reasons.

First, actual and forecast sixth-form numbers appear on the demand side for each year. If sixth-form capacity is not reported on the supply side, non-existent shortfalls in sixth-form capacity are shared out as apparent shortfalls in capacity for Years 7 to 11 as well as for sixth form.

Secondly, if a school has capacity for a planned sixth form, but sixth-form numbers turn out to be considerably less, that sixth-form space may be available for pupils in Years 7 to 11 if there is demand for it. These considerations are reflected in the formula which is used by the DfE to calculate net year group capacity for Years 7 to 11

Thus, shortfall estimated in SCAP returns depends on the accurate reporting by the local authority of the total capacities of its schools. We have discovered that in SCAP 2017 the total capacity of the secondary schools was understated for the reasons described above by more than 1,000 places across the borough.

This understatement of capacity, together with overestimation of pupil numbers, led to shortfall predictions in the east of the borough of around 300 places in Year 7 in each of 2021, 2022 and 2023.

It was those predicted shortfalls that prompted the DfE to agree to the move of the Livingstone Academy East London from Tower Hamlets (where it was no longer needed) to Mortlake. They were persuaded that there was a changing need in Richmond sufficient to justify the allocation of this free school to Richmond.

But this predicted shortfall was entirely the product of over-forecasting pupil numbers and understating school capacity.

3.4 Richmond's Reputation for Accurate Forecasting

Both the LA and the DfE have responded to our questioning the data by pointing out that Richmond is ranked in the top quarter of local authorities in England for the accuracy of its forecasting in SCAP. So, we needed to examine how this could be, given our earlier findings.

The accuracy of forecasting of school populations is reported annually in the DfE *Local Authority School Places Scorecards*. Only the forecasts made one year ahead, and three years ahead are assessed.

The report provides detailed analysis of the implications, but in summary the scorecards are biased and inadequate, because:

1. they do not assess forecasts made 4, 5, 6 or 7 years ahead, even though these are the forecasts that matter for medium-term decision-making.
In Richmond, the largest errors are found in Year 7 forecasts made 4, 5, 6 and 7 years ahead, because these ignore the greatest amounts of cohort shrinkage
2. up to three years ahead, even quite large errors in Year 7 forecasts are masked because most of the data in the calculation of the total roll in Years 7 to 11 are not affected by the anomalies we have detected

Thus, the use of the DfE scorecards as evidence of the reliability of the LA's forecasting is misleading.

3.5 Data cleaning in SCAP

How it is that the extensive 'data cleaning' that the DfE carries out on all SCAP returns missed these errors in forecasting school place demand? We used a Freedom of Information request to ask about three exceptional forecasts, in which the final forecast Year 7 cohort exceeded the threshold that triggers an automatic query.

The response from a member of the Pupil Place Planning Team was:

With regards to Richmond's School capacity (SCAP) forecasts for year 7 pupils they provided an accompanying note for all three SCAP returns (17,18,19) which explained the increase in pupil numbers forecast for year 7. They stated this was a reflection of the higher number of pupils in primary moving through the school population from the associated planning areas. This explanation also reflects the trend we saw nationally, and we published this line in the SCAP 2019 publication commentary:

Local authorities expect secondary pupil numbers to continue to rise as the increase previously seen in primary pupil numbers continues to move through the secondary phase.

However, in Richmond the local authority predicted in SCAP 2019 that the Reception cohort of 827 in January 2019 would **shrink** to 773 by Year 5 in 2023/24. The forecast is in the data of SCAP 2019. That Year 5 cohort is not going to increase in size between 2023/24 and when it leaves in summer 2025.

Nevertheless, it was forecast by the local authority to generate a Year 7 cohort of 745, also in the data for SCAP 2019. This would require over 96% of the cohort to move on to state-funded schools in the Borough, even assuming it shrinks no further between the academic years

2023/2024 and 2024/2025. However, the equivalent historical figure for the east of the borough, which includes Mortlake, is below 80%.

The sudden increase in year 7 numbers is not explained, as claimed, by 'a higher number of pupils moving through the school population' or 'the increase previously seen in primary pupil numbers'. In fact, table 2 shows the Year 5 cohort in 2023/24, due to leave in 2025 (coloured pale green), to be the lowest for eight years. The local authority's forecast in SCAP 2019 of the Year 7 cohort for 2025 represents, quite simply, a virtually impossible conversion rate, when set against the historical rate of less than 80%. Yet the DfE were persuaded that this, among other exceptional forecasts, was 'robust'.

3.6 Effects of Misreporting on Decision-making

If, as we believe the evidence shows, there is no numerical case for the new school but, rather, a situation of diminishing Year 6 and Year 7 rolls from 2021 onwards, all the arguments in favour of the new school have to be reappraised. For example, in the GLA Stage 2 report on the planning applications, paragraph 41 reads:

This table [in paragraph 40] shows that, by 2022-23, there is predicted to be a shortfall of 5,938 secondary school places (in London). In the context of the shortfall set out in this table, the provision of 900 new secondary school places is considered to have a significant impact on the implementation of the London Plan, in terms of education provision.

We have been told by London Councils that data for the *Do the Maths* report 2020, from which the table was extracted, were collected in August and September 2019. Compilation of SCAP 2019 finished in July 2019 and compilation of *SPPS 2019* began in October so, although we were not given access to the data submitted by Richmond to London Councils, it is highly likely that they will have been based on one or other of those documents.

Corrected for the anomalies we have found in both, the predicted need for new secondary places in Richmond by 2022/23 should be in the region of 264. That is the total for the whole borough for Years 7 to 11 and it ignores bulge classes. It happens to be concentrated in the east but can nevertheless be accommodated by two additional forms of entry at existing schools, as can the corrected forecasts up to 2025/26. The west of the borough, while technically regarded as in balance because surpluses are counted as zero, in fact will have large numbers of spare places in every year group, in every year forecast.

With 900 new secondary school places in Mortlake, the east also will have a considerable number of spare places, to the detriment of the two schools closest to the Brewery site, Richmond Park Academy and Christ's School, both of which need to expand in order to safeguard their sixth forms. Mortlake is not the right place for this extra provision.

3.7 The Alternative to a New Secondary School

We acknowledge that there will be a temporary increase in secondary school place demand in the eastern part of the borough, but the increase will occur before any new school can become available. After the peak in 2021, demand will decrease.

A new school, built after the main pressure has passed and preventing expansion of the existing schools, makes worse the problem of accommodating the shortfall which will have accumulated before its availability. By the time it is available it will not be needed, provided the existing schools have been enabled to expand, which they need to do both to accommodate the accumulated shortfall and to safeguard the viability of their sixth forms.

Thus, the negative planning impacts on the immediate surroundings that would result from a secondary school sited on the Stag Brewery development are not mitigated by any benefits. On the contrary, they are accompanied by further, avoidable, damage to the existing schools.

Having examined the sites of the two existing schools (Richmond Park Academy and Christ's School), we have shown that there is adequate space at both to expand and accommodate all additional demand. The proposal for Christ's would encroach on MOL, but there is already precedent of developing on this land when the school's sixth form was built, and the developments that took place then left some land which does not provide a usable open space. It would, however, allow for more accommodation to be built. In the case of RPA, the proposal may involve using some OOLTI, but that use will be significantly less damaging than what is being proposed for the Stag Brewery site.

On discussing expansion with the two heads, one said that they definitely would like to expand, and the other said that at present they did not want this, because a previous expansion was still settling down, but they would be willing to consider it if approached in the future. This was contrary to the position expressed by the LA previously which stated during a meeting that *"the LA is very clear that the schools do not want to expand"*.

There are several advantages with expansion accruing to the development and the existing schools:

- The "green" OOLTI space on the Stag Brewery site could be preserved in its entirety
- The development's negative impact on traffic and local transport infrastructure, and its deleterious impact on air quality, would be considerably lessened
- The Thomson House primary school, which is located on a split site straddling the railway line, could potentially relocate to a safer location on the Brewery site, thus mitigating some of the danger already existing at the Sheen Lane level crossing
- The overall development could be made less overbearing and there would be potential for less obtrusive provision of affordable housing than is being proposed
- Additionally, this approach would help the two existing schools expand their intake, which would result in greater numbers flowing through to their sixth forms, thus improving their viability
- The sites at Christ's and RPA are larger than the land allocated for a school on the Brewery site by factors of 2.7 and 1.9 respectively. This would provide a better educational and developmental environment. Any form of social distancing would be difficult to achieve with a school of 1,200 pupils on a site of the size proposed for the Stag Brewery.

- These developments could be completed in time to meet the additional demand, would protect the schools from the long-term imposition of demountable classrooms and would be considerably cheaper – an important consideration at this juncture.

3.8 Conclusion

An immense amount of rigorous analysis has been undertaken, resulting in a report which deserves the attention of the GLA when reaching its decisions.

This paper draws on this report, the findings of which are much more extensive than can be summarised here.

Crucially, these findings show that there is no numerical need at all for a new secondary school to be built on the Stag Brewery site, and that Council decisions have been based on predictions that have significantly exaggerated the extent of the need. The smaller increase in demand will occur before a new school could be built.

The absence of a substantial secondary school as part of the development would avoid several problems impacting on the development and the local community.

Finally, we must point out that before the school's running costs can be provided by the funding agency it is a statutory requirement that the sponsors consult all relevant local stakeholders. This will probably not take place until after the school is built. If in due course this confirms the lack of need and the potential damage of over-provision of school places, as we believe it will, considerable expense will have been incurred for no benefit, and considerable environmental damage inflicted.

We urge the GLA to examine our arguments and data carefully before considering the planning application.

Appendix F
The Authors of this Report

Peter Eaton, Architect

Peter is an architect and until recently director of a large international architectural and design practice based in London and with studios in Moscow, Istanbul, Berlin, Frankfurt, Prague Abu Dhabi and Dubai. He specialises in large complex mixed-use master planning projects and advising on clients' real estate strategy. He has completed many design award winning schemes for corporate businesses and educational bodies and has wide experience in a range of development sectors including residential, offices, academic and life sciences. One of his schemes for Trinity College Cambridge was recently awarded the prestigious Cambridge Design and Construction Award 2017. He lives locally on the riverside in Mortlake and played a major role in working with Richmond Council on the detailed Planning Brief for the Stag Brewery site which was formally adopted in 2011 to guide future development of the Stag site.

Tim Catchpole, Urban Planner

Tim is a Fellow of the Royal Town Planning Institute with a 40-year career in urban planning and environmental impact assessment (EIA). His first 15 years were spent here in London and included 11 years at the Greater London Council. His next 25 years were spent in the master planning team of a leading UK engineering consultancy, with whom he has led major development projects in the UAE, Saudi Arabia, Qatar, Jordan, Iran, India and China and contributed to such projects also in Brunei, Venezuela and South Korea, also to planning policy projects in Yemen, Mauritius and the West Indies. He has led EIA studies of major development projects in the UK and Malta and contributed to EIA studies of major infrastructure projects in the UK, Bangladesh, Thailand, Malaysia, Indonesia and the Philippines. After retiring as director of this team he has been free-lance planning consultant on major development projects in South Africa and Uganda. He has lived in East Sheen for 40 years and is Chairman of the Mortlake with East Sheen Society.

Howard Potter, Transport Planner

Howard is a Chartered Civil Engineer and Town Planner with many years' experience directing or managing a broad range of planning and transport studies projects and research. His career whilst in the public sector was concluded with some 8 years as the first Chief Officer responsible for transport planning and engineering in London's Docklands where he was responsible for the creation and execution of a multi-million multi-modal transport strategy for the area and its integration within the Dockland's masterplanning work. He founded and ran the LDDC's Use of the River Group to facilitate greater use of the Thames for freight and passenger transport. He has worked extensively in the private sector with consultants Wootton Jeffreys, Atkins, TPI and Amey at Director and Technical Director levels and has been responsible for a large number of land-use and transport planning studies, urban transport studies, local and national parking strategy and policy studies, airport surface access studies in the UK, Greece and India, toll road studies, road pricing studies, sustainable transport and public transport studies. He has carried out research into innovative highway and urban design approaches for the Highways Agency and acted as a facilitator for the HA. He serves as vice chairman on the ICE's Expert Transport Panel, is a Board member of the Transport Planning Society, is Chair of the multi institution special interest group on road pricing (the Green Light Group), and Chair of the Stratford Transport Implementation Group (overseeing sustainable transport investment for the major Stratford City developments and the Olympic Park). He has lived in East Sheen for over 40 years.

Dr Emma Jack

Dr Emma Jack is an Environmental Specialist with 20 years' experience in natural resource management, climate change planning, and environmental construction compliance, specifically

stormwater and air quality. She grew up in East Sheen and then moved to California where she has worked on numerous public and private planning projects including large infrastructure schemes, housing estates, retail parks, and large-scale remediation and restoration projects. More recently she has moved to Brussels where she runs an ecotoxicology department for a chemical industry consultancy and has begun a Master's degree in Environmental Law (LLM) by distance learning, to update her knowledge on both UK and EU environmental practice and regulation.

Dorian Crone, Heritage Consultant

Dorian is a Chartered Architect and Town Planner and a member of the Institute of Historic Building Conservation. He has worked for over 30 years as Historic Buildings and Areas Inspector with English Heritage, responsible for providing advice to all the London Boroughs (including Richmond-upon-Thames) and both the City Councils. He is a Guardian of The Society for the Protection of Ancient Buildings, and a committee member of the International Committee on Monuments and Sites (ICOMOS) and the Institute of Historic Building Conservation. He has been a court member with the Worshipful Company of Chartered Architects and a trustee of the Hampstead Garden Suburb Trust. He is currently a trustee of both the Dance and Drake Trusts. He is a panel member of the John Betjeman Design Award and the City of London Heritage Award, and is a Design Review Panel member of the South West Region, the London Boroughs of Richmond upon Thames, Islington and Wandsworth, and the Design Council. He has lived in East Sheen for most of his life.

Patience Trevor

Patience has spent her career working in the public sector, first in the Conservation team for Cheshire County Council, Planning Department, but principally for English Heritage, later Historic England, as Senior Adviser in the South Listing Team, covering London and the South East, on the assessment of historic buildings for statutory listing, landscapes for inclusion in the Register of Historic Parks and Gardens, archaeological sites for scheduling. Listing assessments have covered a wide range of building types from the medieval to post-war periods, most recently including post-war infrastructure and Postmodernist architecture. She has lived in East Sheen for over 30 years.

Geoff Woodhouse

Geoff began his association with education in Richmond when he became a mathematics teacher at Shene School, the precursor to Richmond Park Academy. He was seconded to the London Borough of Richmond upon Thames as a statistician at the start of 'Local Management of Schools'. He went on to the Institute of Education, London, where he lectured in statistics and contributed to the then lively national debate on 'School Effectiveness'. He found that LEA league tables (as they were then) were unstable, and depended critically on the model used to predict schools' outcomes from their intakes. Finally, Geoff returned to education in Richmond as a mathematics lecturer in the Richmond upon Thames College. He has lived in East Sheen for over 40 years.

Geoff Stanton

Geoff is a Visiting Fellow at the UCL Institute of Education, and an independent consultant. He has a special interest in 16-19 education and training. He was for four years Vice Principal of Richmond-upon-Thames Tertiary College, and for eight years CEO of the Further Education Unit, a government-funded quango with a brief to review and develop FE curricula in England and Wales. He has lived in East Sheen for over 40 years.