



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

**Mortlake**

**for the Mayor of London**

**Ref: GLA 4172**

**Re-consultation on revised documents**

**31 Oct. 2020**



## Re-consultation on revised documents

Following submission of our representation on the planning applications on 27 Sept 2020 we have received a letter from the GLA advising us of the receipt of additional documents comprising:

- Revised Design Code
- Revised drawings including amendments to cinema/office design resulting in reduction in height by 2m
- Revised Design & Access Statement Addendum
- Revised Environmental Statement Addendum
- Energy Strategy Addendum
- Circular Economy Statement
- Whole Life Carbon Assessment
- Further information in the form of drawings and Environmental Statement sections.

We have inspected these documents. One member of our team was puzzled to see the Design and Access Addendum included because it had already featured on Richmond Council's website while other members had never seen it before having turned to the GLA website which seemed to contain no such document. This is presumably why the document is now included among the additional documentation.

Accordingly much of this response focuses on the Design and Access Addendum including its Building Heights Plan and photomontages as most of our team had not seen these before, albeit we had seen some of the photomontages in the Environmental Statement Addendum.

This report begins with a summary that makes seven key points. The report itself contains seven sections, each amplifying a key point.

## Key points in summary

The key points arising from our inspection of the additional documentation are as follows:

1. **Building Heights, Massing, Density.** The Building Heights Plan and additional completed photomontages prove the point that the latest proposals significantly exceed the scale and density of what was approved in January 2020, indeed the total volume has increased by 22%. This contravenes CLP Policy 3.4 (optimising housing potential), NLP Policy D3 (optimising site capacity) and NLP Policy D2 (infrastructure requirements for sustainable densities).
2. **The Heritage Assets.** The additional completed photomontages also show an adverse impact on the locally listed Maltings (it was the tallest building in January but there are now nine buildings that exceed its height), the statutorily listed houses on Thames Bank and the Mortlake Conservation Area. The Town Planning Statement indicates that this is outweighed by the public benefits that the development will bring to the area but we strongly disagree.
3. **Energy.** The Energy Strategy Addendum mentions the lack of opportunity for solar panels on the school because its flat roof is to be used as a play area. This confirms more than ever that this site is too small and cramped for a secondary school.

In addition, we have now finalised and submitted our report to the Department for Education proving that the need for a secondary school on this site is baseless. This has prompted us to add the following supplement to key points nos. 8 and 9 in our submission of 27 Sept (see Appendix A):

4. **The Secondary School.** Any further increase in secondary school places can be met by expansion of accommodation in the existing two secondary schools nearby, namely Christ's School and Richmond Park Academy (RPA). Expansion at the former will entail a very slight encroachment onto a strip of MOL. Richmond Council has refused to consider such a prospect and yet it has recently granted planning permission for a new secondary school elsewhere in the Borough entirely on MOL. The benefit of such expansion is that both Christ's School and RPA will be able to achieve viable 6<sup>th</sup> forms (at present they are not viable).
5. **The Primary School.** In place of the secondary school on this site we need a primary school, as indicated in the Planning Brief of 2011. The new Thomson House School, which has been dangerously located next to the level crossing in Sheen Lane, should be relocated to this site. The grass playing fields should be retained for use by this school, as indicated in the same Planning Brief, and not be replaced by an all-weather pitch for use by a secondary school. The Head of Thomson House School is in agreement on this.

In addition (again) we have taken expert advice on the basement carpark from a Geoscientist (FGS) and subsurface interpretation specialist with over 40 years of experience (see potted bio in Appendix B) and this has prompted us to make the following supplement to key point 6 in our submission of 27 Sept (see Appendix A):

6. **The Basement Carpark.** Due to global warming/climate change and sea level rise, storm surges will be rapid and catastrophic and will easily overwhelm the Thames Barrier and the flood defences along the banks. The planned development will exacerbate the storm surge flood risk for residents in Mortlake and Barnes as its flood defences will deflect the primary wave south into Mortlake towards Chalker's Corner and channel secondary waves further south as well.

Finally, we have further comments on the Transport Assessment which has prompted us to make the following supplement to key point 4 in our submission of 27 Sept (see Appendix A):

7. **Hammersmith Bridge.** The Government Taskforce which has taken over the management of the bridge has since 27 Sept revealed that the restoration of the bridge could take up to six years (or more). The Transport Assessment has not taken this into account; it needs to assess the impact of this restoration programme on traffic using the gridlocked Lower Richmond Road during the construction phase, any use of the river for the transportation of waste being impossible due to safety issues on the underside of the bridge. It also needs to address the issue of how COVID is affecting transport and the growing popularity of people working at home in London or indeed choosing to move out of London. In our view the traffic problems in Mortlake are so severe that it would be impractical to carry out construction work during the next six years. We fully supported the granting of planning permission for the temporary use of the site for film studios in May this year and will continue to support this temporary use until Hammersmith Bridge re-opens.

## 1. Building Heights, Massing, Density

The Planning Brief for the site (see below) indicated building heights as follows:

1. Mix of heights up to 7 storeys along the riverside stepping back from the river at ground level and upper floor levels, so that the height diminishes towards the site perimeter;
2. Mix of heights to 6 storeys along Mortlake High Street and Lower Richmond Road to Ship Lane;
3. Mix of heights to 6-7 storeys from Ship Lane to the existing main entrance off Lower Richmond Road;
4. 3-4 storeys from the main entrance to the playing fields and 4-5 storeys further north;
5. 3 storeys to the south of Thames Bank.

The submission approved by the Richmond Council Planning Committee in January, referred to as the original scheme (see next page), did not comply with the Planning Brief in the following regard: no stepping back of the upper floors in Area 1, a 7-storey element in Area 3, a 6-storey element in Area 4 and a 4-storey element in Area 5.

The latest scheme (also on next page) shows 8, 9 and 10-storey elements in Area 1, 8-storey elements in Area 3, 7-storey elements in Area 4 and the replacement of 3-storey with 4- and 6-storey elements in Area 5.

In the Planning Brief the building heights were imposed in order to keep the density and impact on traffic within reasonable limits (as well as minimising any impact on the locally listed 8-storey Maltings and the statutorily listed houses along Thames Bank – see Section 2 below). The latest scheme, with its significant increases in height, has flagrantly breached the guidance in the Planning Brief (see next page following).



FROM THE PLANNING BRIEF, 2011



The increase in heights is addressed in Section 2 in relation to views from various public vantage points, however we have a particular concern in Section 1 with the impact of the 4-storey blocks replacing the 3-storey terraced houses backing onto the private rear gardens of Thames Bank. These blocks are closer to the boundaries of these listed buildings and their massing will be overbearing creating problems of overlooking and loss of amenity.



BUILDING HEIGHTS, ORIGINAL SCHEME



BUILDING HEIGHTS, LATEST SCHEME



BUILDING HEIGHTS, LATEST SCHEME COMPARED WITH PLANNING BRIEF

In our submission of 27 Sept 2020 (see Appendix A) we indicated that 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.

Indeed, the housing potential and site capacity are not optimised but maximised, and there is no possibility of improving the infrastructure because it comprises a single road which is gridlocked at one end by the choked Chalker's Corner junction and at the other by the shambolic Sheen Lane level crossing, for neither of which is there any sensible solution in sight. The development – and not just Application A but also the proposed secondary school in Application B (if justified) – needs to be scaled down within the limits of this infrastructure.

Now that we have seen the Building Heights Plan, from which we have calculated that the increase in the volume of development is close to 20% on the original scheme, we are more than ever convinced that this scheme is simply unworkable.



In addition to the Building Heights Plan we have seen these illustrative plans and note that the latest scheme shows a lot more detail for the western part of the site which we now realise is Phase 1 and comprises the affordable housing component. On first glance it would appear to be 'more of the same' and, given the size of the site, we feel there needs to be more variation in architectural treatment. This part of Application A is still in outline and this issue needs to be addressed at the next stage.



ORIGINAL PROPOSAL: ILLUSTRATIVE BIRDS EYE VIEW OF MASTERPLAN



REVISED PROPOSAL: ILLUSTRATIVE BIRDS EYE VIEW OF MASTERPLAN



## 2. Heritage Assets

We note that the Design and Access Statement Addendum includes two completed photomontages not previously seen. The Townscape and Visual Impact Assessment (TVIA) of 2018 identified 12 viewpoints from which photomontage studies were being undertaken. The Environmental Statement (ES) Addendum of July 2020 showed two completed photomontage studies (nos. 6 and 7) and the rest in outline only and the section on Built Heritage tabled the heritage assets and indicated the following impact on their settings (N.B. the table did not include the former hotel and bottling plant building):

The locally listed Maltings – from minor beneficial in the original scheme to minor adverse  
The statutorily listed buildings on Thames Bank – from minor beneficial to neutral  
Mortlake Conservation Area – from minor beneficial to minor adverse  
Mortlake Green Conservation Area – from minor beneficial to neutral  
Jolly Gardeners pub – from minor beneficial to neutral.

In our submission of 27 Sept 2020 we commented as follows: “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 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 benefits will outweigh the harm.”

Our contention is that 18 of the 19 public benefits listed in the Town Planning Statement are irrelevant because they are being provided regardless. The only benefit that is relevant is the provision of 356 affordable units which can only be achieved by massively increasing the housing quantum to 1250 units at the cost of harm to the heritage assets (not to mention *inter alia* the impact on traffic caused by the significant increase in density). For this reason we continue to maintain that the harm caused contravenes CLP Policy 7.8D and NLP Policy HC1C (heritage).

The provision of affordable housing has to be welcomed but it raises the issue of why so much affordable housing is required. (The answer is that a large number of foreign investors have been buying property in London which has caused substantial increases in property value thereby preventing many Londoners from buying property within their means. This problem has to be addressed by Government.)

The two completed photomontages are the views from Duke’s Meadow opposite the Maltings (TVIA no. 6) and from the northern end of Chiswick Bridge (TVIA no. 5). The latest Addendum shows no change to their view. We also show two photomontages that are not yet completed, namely the views from Thames Bank and along Lower Richmond Road. And finally we show a view in the Design and Access Statement Addendum not previously seen, namely that from Mortlake Green along Mortlake High Street including the locally listed former hotel and bottling plant building.

### **The view from Duke's Meadow opposite the Maltings (TVIA no. 6)**

In the original scheme the buildings to the left of the Maltings in the eastern part of the site rise to 7 storeys. They compete with the Maltings but they do not appear to exceed the height of its roofline. The building to the right of the Maltings in the western part behind the locally listed pub (the Ship) rises to max 7 storeys and is shown in outline only.

In the latest scheme the buildings in the eastern part rise to 9 storeys and are clearly dominant. The building to the right of the Maltings in the western part rises to 8 storeys and is now showing more detail and appears to be competing with the Maltings. The Town Planning Statement, if updated, would probably describe this as less than substantial harm which can be outweighed by public benefits but we would disagree.



ORIGINAL PROPOSAL: WATERFRONT VIEW



REVISED PROPOSAL: WATERFRONT VIEW

### **The view from the northern end of Chiswick Bridge (TVIA no. 5)**

This view tells the same story to the left of the Maltings in the eastern part of the site as presented in the previous view. To the right of the Maltings in the western part the buildings in the original scheme are shown in outline at 6 storeys reducing to 5 and 4 storeys making a minor impact on the settings of the listed buildings on Thames Bank.

In the latest scheme these buildings to the right of the Maltings have increased to 9 and 8 storeys reducing to 6 storeys in the same hinterland making a more significant impact on the settings of the listed buildings. The Town Planning Statement, if updated, would probably describe this as less than substantial harm which can be outweighed by public benefits but we would disagree.

We note that existing trees that feature behind the listed buildings in the original scheme have disappeared in the latest scheme. Have they been felled?



ORIGINAL SCHEME



REVISED SCHEME

## The view from Thames Bank (TVIA no. 2)

One riverside view where a photomontage study has not been completed is this one from Thames Bank showing the listed buildings on the right and the Maltings beyond the tree. In the original scheme the buildings beyond the Maltings shown in outline seem harmless whereas the significantly taller buildings in the latest scheme are clearly more dominant.

The original findings of the TVIA indicated: "Road users on Thames Bank (seen here) would experience effects of minor adverse significance, however this would be temporarily in transit. Recreational users of the Thames Path National Trail would experience long-term, local effects of moderate adverse significance."

We agree with this statement, in particular because the upper floors have not been set back as recommended in the Planning Brief.



Viewpoint 2: Proposed view from Thames Bank adjacent to the University Boat Race marker looking south east towards the Stag Brewery Component of the Site.



Viewpoint 2: Proposed view from Thames Bank adjacent to the University Boat Race marker looking south east towards the Stag Brewery Component of the Site.



### The view along Lower Richmond Road (TVIA no. 1b)

This view shows the proposed school on the far left and a 4-storey building next to it adjacent to the locally listed Jolly Gardeners pub beyond and the proposed cinema/office building beyond that. This view has not altered in the latest scheme and the photomontage is regrettably not complete.



An additional photomontage has been produced showing the impact of the proposed cinema on the same pub with the height of this building reduced to mitigate the impact. We do not have a problem with this.



REVISED PROPOSAL: ILLUSTRATIVE VIEW OF CINEMA BUILDING

**The view along Mortlake High Street from Mortlake Green (not featured in TVIA)**

This view, which has not featured in previous documentation shows, shows the locally listed former hotel and bottling plant building. Beyond is a proposed 5-storey building in the original scheme which has risen to 6 storeys in the latest scheme. Whilst within the height limit given in the Planning Brief, such height on the edge of the site on this side of the street is unprecedented.

It is worth noting that in this view and in all other views shown in the Design and Access Addendum there are remarkably few cars. Maybe the COVID 19 lockdown is here to stay.



ORIGINAL PROPOSAL: THE FORMER BOTTLING BUILDING



REVISED PROPOSAL: THE FORMER BOTTLING BUILDING

### 3. Energy

The other additional documentation comprised the following:

- The Revised Design Code provides more detailed info about the heights of buildings, the spaces between them, the building typologies, the public realm, the character areas, etc.
- The Revised Drawings show the cinema which now has three floors of offices above it (previously two) and all additional floor plans on other buildings.
- The Revised Environmental Statement Addendum relates only to the revised drawings of the cinema and does not consider the additional floor plans on other buildings
- The Energy Strategy Addendum shows how solar panels on the roofs of buildings in Application A (the housing and mixed use development) can help reduce carbon emissions but notes that in Application B (the school) the opportunity is lost as the roof is to be used as play space.
- The Circular Economy Statement is a GLA requirement and is about minimising demolition waste and maximising the recycling of existing materials, the aim being to achieve zero waste. The Statement merely indicates that there will be a Pre-Demolition Audit and a Sustainable Procurement Plan at the next stage.
- The Whole Life Carbon Assessment is also a GLA requirement and is about minimising carbon emissions by replacing finite and fossilised materials with responsibly managed renewable materials.

One key issue arising from this additional documentation is the dilemma posed in the Energy Strategy Addendum about whether the roof of the proposed secondary school should be used as a play area or as a solar panel farm to serve the school with its electricity. In our view this is a lost opportunity and it demonstrates that the site is simply not large enough to accommodate a 6-form entry plus 6<sup>th</sup> form secondary school. This has led us to think further about the school, as indicated in sections 4 and 5 following.





## 4. The Secondary School

Since sending our comments on the Planning Applications to the GLA on 27 Sept we have finalised our report on the proposed secondary school and sent it to Baroness Berridge, Parliamentary Under Secretary of State for the School System. The report clearly indicates that forecast future secondary school place needs in Year 7 have been seriously overstated and the decision to move the Livingstone project from Tower Hamlets to the eastern end of the Borough of Richmond is unsound.

As for the Council's decision to locate the school on the Brewery site we are of the opinion that, in accordance with Policy 3.18D of the Current London Plan, there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school on this site, in particular:

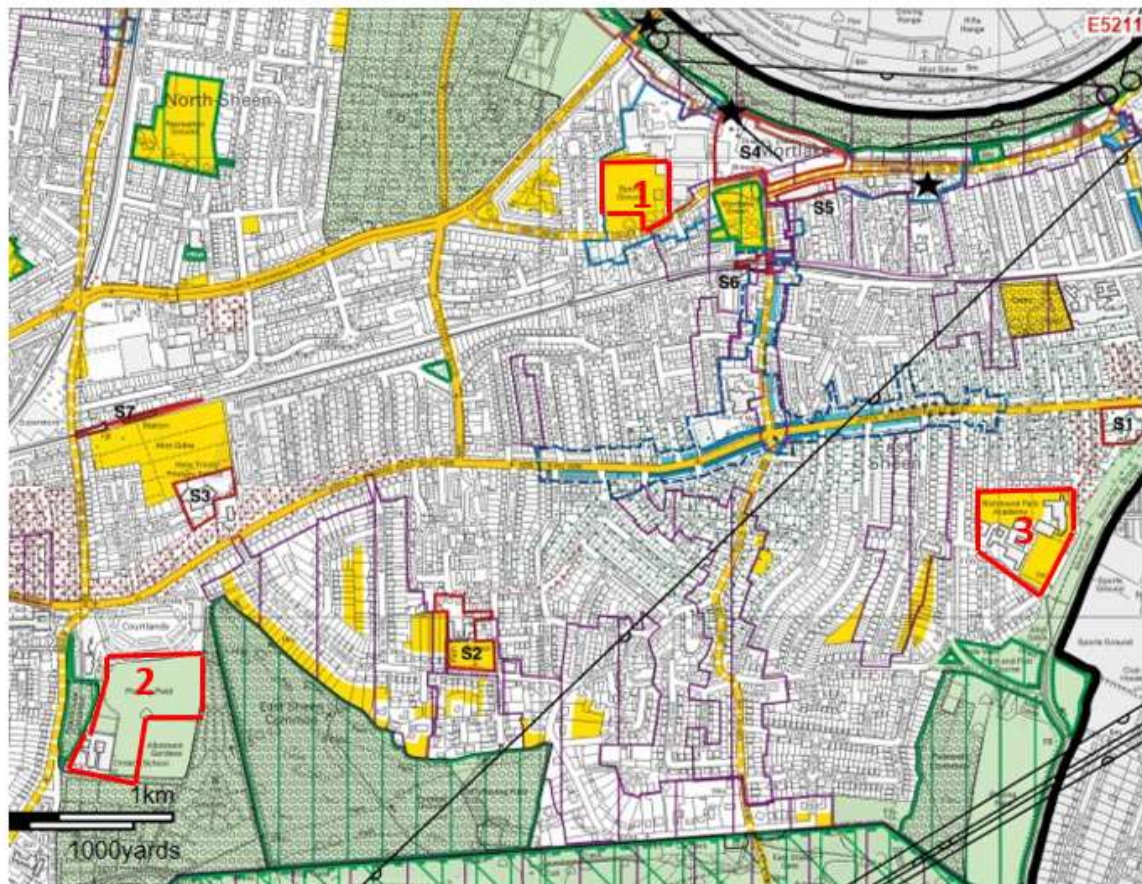
- The site is very cramped – its area is one third of the area prescribed by the DfE for a 6-form entry plus 6<sup>th</sup> form secondary school and is not likely to be acceptable in the post-COVID era;
- The only access to the site is that seen here (below) off Lower Richmond Road which is gridlocked between the choked Chalker's Corner junction and the shambolic Sheen Lane level crossing;
- The development will entail loss of the much treasured grass playing fields and their replacement with an all-weather pitch, fenced in and floodlit;
- Most importantly the development of another school in this area will create problems for the existing secondary schools which are currently struggling to achieve viable 6<sup>th</sup> forms.





Instead, pressure arising from the baby boom of 2008 to 2012 can be met by expanding Christ's School and RPA by a total of three forms. Year 7 demand from this boom will peak in 2021 and subside thereafter, allowing all predicted secondary yield from the Stag Brewery and other developments planned to be accommodated in these expanded schools. Moreover, both schools need to expand so that they can have viable sixth forms.

The plan below indicates the location of these two schools – and also that of the school on the Brewery site – and the constraints affecting expansion, namely Metropolitan Open Land (MOL), as identified by the GLA, and Other Open Land of Townscape Importance (OOLTI), as identified by the Borough of Richmond.



1. The Brewery School – 1.70 ha
2. Christ's School – 4.64 ha
3. Richmond Park Academy -3.30 ha

- MOL
- OOLTI

The Brewery School (capacity 1150 students) would be on a small plot with significant encroachment onto OOLTI.

Christ's School (capacity 930) is on a much larger plot. It has already expanded onto a pocket of MOL which could be filled out. There appear to be two options for further expansion (see below).

RPA (capacity 1100) is also on a larger plot and could expand without encroachment onto OOLTI. Again there appear to be two options for further expansion (see below).

## Christ's School



### Christ's School

Expansion from 5FE to 6FE?

Site area	
School precinct	1.82 ha
Playing fields (MOL)	<u>2.82 ha</u>
Total site area	4.64 ha

- 1** New 6<sup>th</sup> form block (pp granted in 2013) within small pocket of MOL which is vast and includes playing fields, allotments, cemetery, etc.

- 2A** Opportunity to achieve 6FE by - expanding 6<sup>th</sup> form block further north to building line shown dashed
- 2B** - building new wing to east.



### Christ's School

#### Option 2A

Extension of both wings of new 2-storey block as far as the building line of the existing main block will represent further encroachment into the MOL, but only very slight.

#### Option 2B

Development of new 2-storey wing on left-over strip of land on east side will in effect fill out the pocket of MOL but the land does not appear to be used and the impact would again be very slight. Trees to east and south will not be touched.

**In both options** the expansion to 6FE is seen as beneficial as it will help to enable the 6<sup>th</sup> form to become viable.



## Richmond Park Academy



### RPA

Expansion from 6FE to 8FE?

Site area	
School precinct	1.75 ha
Playing fields (OOLTI)	1.55 ha
Total site area	3.30 ha

- 1** Expansion to accommodate 6<sup>th</sup> form has been fragmented (pp granted in 2012).
- 2A** Opportunity to achieve 8FE by - building new 6<sup>th</sup> form block in place of Shene Fitness Centre
- 2B** - building to east of sports hall fronting Hertford Avenue. The existing all-weather pitch can sustain the increase.



### RPA

#### Option 2A

The new 6<sup>th</sup> form block in the style of that recently built at Christ's will cover the same ground as the Fitness Centre including its carpark and will minimise any encroachment onto the grass playing field (OOLTI).

#### Option 2B

There is potential here for a new 2-storey block which could conceivably even rise to 3 storeys.

## The MOL Issue

Richmond Council has repeatedly indicated that it will not allow further expansion of Christ's School because it would entail loss of MOL. However, it has recently (April 2020) granted planning permission for a secondary school in the western part of the Borough on a site that is entirely within MOL and with support from the GLA. It should be noted that this school provides a considerable variety of sport – football, rugby, hockey and athletics – whereas what is proposed on the Brewery site is just a single massive full size FA pitch style MUGA.



TURING HOUSE SCHOOL, HOSPITAL BRIDGE ROAD, TWICKENHAM



## 5. The Primary School

Following publication of the Planning Brief for the Brewery site in 2011 it became apparent that the primary school was needed as soon as possible prior to the site becoming available for development. As a result Thomson House Primary School came into existence using a disused non-conformist church on the south side of the Sheen Lane level crossing with no play area, hence the use of Mortlake Green on the north side of the same crossing. Three years later the school needed to expand and took occupation of a vacant building on the north side of the same crossing.

The school is thus in two buildings separated by a level crossing which happens to be the second most high-risk crossing in the South of England (the Wessex Region). The crossing barriers are down for 40 minutes in the peak hour and our survey of the crossing on 17 May 2017 revealed that the longest time that the barriers were down was 14 minutes. When barriers are down, parents taking their children to the school at 8.30am have to negotiate the footbridge alongside the crossing carrying their buggies and also rather narrow footways alongside stationary traffic which is idling.

There is good reason to bring the two halves of the school together and relocate the school onto the plot identified in the Planning Brief for the Brewery site alongside the grass playing fields – which should be retained as indicated in the Brief and not ‘re-provisioned’, these playing fields being treasured for their use for not just football, but also cricket, school sports days, the annual Mortlake Fair and also as a visual asset and as a place for relaxation and for mental health support during a pandemic.



## 6. The Basement Carpark

The developer's flood risk assessment fails to take into account the North Sea Storms Surge Risks that are now much greater than in 1953 when 307 people died and 40,000 were left homeless in England. These risks are now much higher due to global warming/climate change and sea level rise, the resultant increase in sea volume that the surge can affect, and the increased severity and frequency of these storm events as predicted by global modelling.

The planned development only takes account of down-river and tidal floods of an inherently passive nature but will exacerbate the storm surge flood risk for residents in Mortlake and Barnes as its flood defences to protect the basements will deflect the primary surge south into Mortlake towards Chalker's Corner and channel secondary waves further south as well. The simplistic static flood levels calculated will be slow and gradual as we saw in the Severn Valley last winter. The storm surges will be rapid and catastrophic and will easily overwhelm the Thames Barrier and the flood defences along the banks.

The retreating waters of the storm surge will be even more damaging than the inflow and will gouge large outflow channels in the banks of the Thames taking houses and utility lines with it. Again, this badly planned development will exacerbate the damage and cause major destruction to be focused to the east and west.

**Figure 2-3 Environment Agency Flood Zones Map**

Copyright Environment Agency. Note that identical maps were provided in Product 4 data sets in 2016 and 2017. This map shows a site boundary that has now been superseded.



↓ Storm surge secondary waves



Storm surge primary influx

Modifications by RJA



**Appendix A**

**Executive Summary of the**

**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**



## **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.

# **Appendix B**

## **The Authors of this Report**

The authors of this report are the same team that compiled the Comments on the Planning Applications submitted to the GLA on 27 Sept, but there is one additional author:

### **John Ancock, Engineer**

John is a Consulting Geoscientist (FGS) and subsurface interpretation specialist with over 40 years of experience. Working with Sedimentologists and Reservoir Engineers as well as Micropaleontologists from Europe and the USA in many areas of the world he has helped develop his thorough understanding of the complexity of fluvial and coastal deposition and erosion cycles. In recent years the global warming threats are now occupying more time. He has been living in East Sheen for over 40 years.