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City Hall  
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Dear Sir

**The Stag Brewery GLA/4172  
Consultation on additional information**

Thank you for your letter of 5 February 2021 giving us the opportunity of commenting on the applicant's Technical Notes TN039, TN040 and TN041 and the Highway Mitigation Option Plans.

Our Society was founded in 1969 and one of our main concerns in the 50+ years since then has been the South Circular (A205) which passes through the East Sheen shopping centre. The South Circular is well-known for being a series of joined up inter-village lanes which over the years have been streamlined to become the main orbital road in South London. It has always been heavily trafficked due in part to the inadequacy of a southern orbital public transport mode alongside it. We saw plans in the 1980s for junction improvements and indeed an alternative alignment alongside the Barnes-Chiswick railway which came to nothing, and we collaborated with TfL in the 1990s on the Red Routeing of the South Circular through our shopping centre. In recent years, however, we have seen a further increase in population, homes, jobs and car ownership and the South Circular has reached breaking point.

The Brewery is accessed off the Lower Richmond Road/Mortlake High Street (A3003) which is likewise an orbital road penetrating Mortlake and running parallel with the South Circular and meeting it at Chalker's Corner junction. Our Society fully endorses the submission made by the Mortlake Brewery Community Group and would like to merely expand on a few points made and table a few questions:

**1) TN039 Implications of Hammersmith Bridge Closure**

TN039 indicates that traffic surveys undertaken pre- and post-closure of the bridge (2017 and 2019) show the total traffic increase through Chalker's Corner post-closure to be low with increases of 1.4% and 1.3% in the AM and PM peaks respectively. We are not surprised about this revelation because the Chalker's Corner junction reached saturation levels many years ago, hence there is no room for any increase except along the A316. What the surveys do not reveal, however, is the length of the traffic queues in the Upper and Lower Richmond Roads and other parallel routes such as North Worple Way. These have increased even further following measures taken by the Royal

Parks to reduce rat-running through Richmond Park from August 2020. The applicant has not addressed this.

Nor has the applicant addressed the issue of air quality which can only worsen with the increase in the amount of traffic queuing in these roads. Nitrogen dioxide levels on the Lower Richmond Road sometimes exceed the WHO and EU limits of 40  $\mu\text{gm}^3$  while levels at Chalker's Corner and on the South Circular through our shopping centre are significantly above these limits at around 60  $\mu\text{gm}^3$ , which is serious. It should be noted that at the eastern end of the South Circular – in Lewisham – a nine-year old girl, Ella Kissi-Debrah, died from air pollution, the first such death to occur in London, as confirmed in a Coroner's Court last year.

Nor has the applicant addressed the issue of the Ultra Low Emissions Zone (ULEZ) which is due to be expanded from central London to the South (and North) Circular later this year and will have the effect of turning this orbital road into a sewer of air pollution. The Mayor would do better to extend ULEZ to the M25 and make that the sewer instead.

Questions:

- Will the applicant take into account not just the closure of Hammersmith Bridge but also the Royal Parks' finalised traffic management plan for Richmond Park which will be announced this coming week?
- Will the applicant address the associated issue of air quality which is missing from this Technical Note, including the effect of the expansion of ULEZ?

## **2) TN040 Consultation Response and Highway Mitigation Plans**

TN040 describes the effects of the Highway Mitigation Plans, namely that the two options (widening the left turn into Chalker's Corner and providing a bus lane in Lower Richmond Road) will together result in the loss of 36 parking spaces. It indicates that there is plenty of road space in the hinterland where the displaced vehicles can be parked. However, we need to be realistic here. The owners of these vehicles will be driving around, wasting time and fuel/energy, looking for an empty space first in nearby Kingsway and Shalstone Road, and then, in the likely event of not finding one and knowing that they are not allowed to park in Watney Road or Hanson Place, they will be looking further away in the Mortlake area. The owners will be put to a considerable inconvenience, not least the owner of the car parked in the disabled parking space (outside no. 115).

The bus lane may provide benefit to bus services but TfL will need to prove that it will reduce the traffic – and its associated air pollution – in the single westbound lane alongside it. Such proof can only be obtained through an origin and destination survey which we believe will show that most drivers, being on an orbital journey, are not heading for the same destinations as the buses. If this is true, then it is doubtful whether there will be any easing of traffic conditions and hence any improvement in air quality.

MBCG has expressed its concern about the large numbers of students arriving at the secondary school by bicycle and on foot from the south and the need for them to cross not only Lower Richmond Road but also the railway in Sheen Lane beside Mortlake Station. The facilities at the latter are seriously inadequate and the applicant's 'general improvements' referred to are pitiful. The issue of this traffic movement calls into question whether the Brewery site is the most suitable location for a secondary school – which we believe is a white elephant as the case for it is flawed. We also believe there is a golden opportunity here to relocate Thomson House School away from its

current location on either side of the second most 'high risk' level crossing in the south of England onto the Brewery site as shown in LB Richmond Council's Planning Brief for the site. Such a move would generate local journeys on foot (parents having committed to not using cars) whereas the secondary school would generate significantly more travel over longer distances.

Questions:

- Will the applicant or TfL be more realistic about where the owners of the 36 displaced vehicles will be expected to park, including the owner of the vehicle in the disabled parking space?
- Will TfL prove to us that the provision of a bus lane in Lower Richmond Road will attract drivers into transferring onto buses, i.e. will it carry out an origin and destination survey?
- Will the Mayor agree or disagree that a secondary school is required on this site?

### **3) Highway Mitigation Plans and TN041 VISSIM Modelling Summary**

TN041 indicates that the two options presented in the Highway Mitigation Plans "provide several benefits to the wider area, including bus, pedestrian, cycle and highway improvement works." However, it does not mention what assumptions have been made in using the VISSIM model, which appears to be clothed in secrecy. We hear that the model takes into account generic increases in population, homes, jobs and car ownership but we are concerned that the latest proposals are likely to have an impact on the South Circular and that the model needs to take account of these proposals specifically, not generically. We refer not only to new development in the eastern part of Richmond Borough (e.g. on the Homepage site) but to the massive development currently in train in Brentford of over 10,000 homes and 34,000 jobs in 2015-2030 as shown in our Appendix. We urge the need for a public scrutiny of this model.

Questions:

- Will the applicant or TfL come clean about the assumptions being made in the VISSIM model?
- When was the last time an origin and destination survey was carried out on the South Circular?

### **Conclusion**

We conclude by quoting the following policy in the newly published London Plan, vis.  
D2: *"Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of the current and future planned supporting infrastructure."* The current supporting infrastructure is not adequate and the proposed future planned supporting infrastructure, i.e. the widened left turn, the bus lane and the 'general improvements' at the Sheen Lane level crossing, are neither robust nor sufficiently evidenced.

We would be grateful for responses to the above questions before the two applications proceed to the public hearing.

With best regards



Tim Catchpole, Chair