



4 January 2023

Head of Development Management
LB Richmond upon Thames
Civic Centre
44 York Street
Twickenham TW1 3BZ

Your ref: stagbreweryredevelopment@richmondandwandsworth.gov.uk

Dear Sir/Madam

Redevelopment of Former Stag Brewery, Lower Richmond Road, Mortlake SW14 7ET
Application A: Ref 22/0900
Application B: Ref 22/0902

I refer to your letter of 9 December 2022 advising us of amendments to the above applications and inviting comments by the deadline of 14 January 2023.

We have waded through the documentation and seen the amendments that have been made. While we accept the alterations to Building 1, the reduction in the height of Building 10 and the tinkering of floor plans to comply with the latest building regulations, we find it very difficult to accept the reduction in the amount of affordable housing shown in the Addendum Financial Viability Assessment.

We had been hoping that the amendments will have addressed some of the other remaining concerns listed in our submission of 29 May but we are disappointed to see that none of these has been addressed. Accordingly, we are sending you our comments again – with updates and also this time the relevant policy references highlighted in red.

In our view this new application is still pushing a quart of development into a pint bottle and should be refused.

With kind regards

Tim Catchpole
Chair
info@mess.org.uk

Latest Planning Applications for the Brewery Site

The Mortlake with East Sheen Society's Committee met on 3 January 2023 and decided to re-send the comments it made on the original plans in May 2022 below with updates highlighted in red.

Our Verdict

The Mortlake with East Sheen Society's Committee met last night (Mon 30 May) to deliver its verdict on the draft representation which had been prepared by its Planning Sub-group (an advisory team of members who are architects, planners, heritage experts and engineers). Our Committee, which has on previous occasions in the past four years endorsed the representations made by the Mortlake Brewery Community Group, has on this occasion reached out to its 420 members by first holding a Zoom meeting to obtain their views and then circulating to them the draft representation. Our Committee last night decided to oppose the two applications and their decision was unanimous.

Consultation with our members

We held the Zoom meeting with our members on Mon 9 May. The two applications were presented to an audience of 80 approx. who were asked to cast their votes on a number of issues by clicking on Yes, No or Don't know. In general there was agreement about several positive changes that had emerged since the previous scheme which was refused by the Mayor in July of last year. However, there were still concerns about the cumulative density of the housing plus flexible floorspace plus a secondary school on such a cramped site, the inadequacy of the roads and public transport to accommodate such density, the building heights still exceeding those in the Planning Brief, the lower-than-expected percentage of affordable housing, the dangers at the Sheen Lane level crossing, the loss of the grass playing fields, etc. The voting results are shown in Appendix A. We have found ourselves re-iterating the same concerns expressed before but this time with the benefit of having seen the reports of the independent Design Review Panel (DRP).

The Design Review Panel

We have on numerous occasions in the past four years insisted that any redevelopment of this site should be the subject of an independent assessment by a DRP. In times past any proposals for this major development site would have been assessed by the Royal Fine Art Commission (1924-1999) or by its successor, CABE (1999-2011) and in times present by a DRP. We now at long last have a DRP, albeit at the 11th hour. We endorse the advice and concerns of the DRP and we make reference to its comments below where relevant.

A. The housing and community hub (22/0900/OUT)

Density and traffic **plus a healthy environment**

We note that the DRP in its letter of 28 Feb 2022 has "felt the scheme is too dense for this area... and resonates more with areas in Central London where higher density is expected." We have been saying the same for the past six years. Whilst appreciating that the Council has to meet housing targets imposed on it by the Mayor of London who in turn is under pressure from Central Government, we have long argued that the density of the development must be dictated by the site's accessibility by road and by public transport. And, in the post-Covid era, we must now add a third dimension, namely a healthy environment.

The road accessing the site is the Lower Richmond Road and its continuation into Mortlake High Street. This is a highly congested road through a narrow corridor between the river and railway and

whose capacity is constrained by the Chalkers Corner junction at one end and by the Sheen Lane and White Hart Lane level crossings at the other. We are aware that the Council's Planning Committee in 2020 – and also the Mayor in 2021 – visited the site in the middle of the day and we urge them next time to visit it in the morning peak in order to get a truer picture of the gridlock and environmental pollution at this end of the Borough – particularly at 8.30am when children will be arriving at the proposed school. Appendix B to this representation (not on-line) is a photographic survey taken of the typical gridlock conditions from Mortlake High Street along Lower Richmond Road to Chalkers Corner at this time of day (N.B. This survey was undertaken in 2017 long before the closure of Hammersmith Bridge).

We are frankly sceptical that the proposed widening at Chalkers Corner within existing highway limits will solve any problems while the proposed improvements at the Sheen Lane level crossing are for the benefit of pedestrians and cyclists and do nothing to improve capacity. While both the Council and the Mayor are arguing that drivers should transfer to public transport or bicycles where possible, we maintain that both the Lower Richmond Road and Upper Richmond Road carry orbital traffic, for which public transport alternatives are limited, and that the orbital traffic is now being increased by development within its corridor (Homebase, Kew Retail Park, Barnes Hospital) – and also in its offshoot corridor from Brentford to Heathrow. We have frequently insisted on the need for an O&D survey on these roads but there has been nil response.

In terms of public transport, Mortlake Station is close to the site and its train services continue as before, albeit they have been reduced off-peak (indeed, at the time of writing, they currently don't even exist as trains have not been stopping at Mortlake), while bus services are getting ever slower due to the increasing levels of congestion and the closure of Hammersmith Bridge. We still have yet to see any real public transport improvement benefits associated with this planning application.

In this regard we endorse the separate comments made by Howard Potter, the Transport Specialist in our Planning Subgroup and a long-standing member of our Society. He has long argued that the Applicant's Transport Assessment has not shown evidence that sites with a PTAL rating of 1-2, as here, can support such high density development making minimal use of private transport modes, nor sufficient evidence about existing and future rail service levels, nor sufficient evidence about the impact of this development on the Sheen Lane level crossing, nor any evidence on the condition of other Thames bridges in London (apart from Hammersmith Bridge) which may have to close for repairs. The Transport Assessment must address these issues more thoroughly.

As for the healthy environment, we note that the DRP in its same letter has indicated: "since the 2018 application much has been addressed in policy terms around healthy living and housing standards with the National Design Guide, revised NPPF and a new London Plan. With this in mind, the masterplan feels now slightly outdated...." The DRP is particularly concerned about the single aspect apartments, especially those facing north. We are likewise concerned. The apartment blocks appear very dense and bulky with problems of restricted daylight/sunlight, overlooking and invasion of privacy. Also, in the post-Covid era we must ask if there is sufficient space at ground level to accommodate a development population of 3,000 plus riverside visitors to support the residents' wellbeing and provide a pleasurable environment in which to live and work.

In the same vein the additional population of 3,000 raises the other health issue of whether there is sufficient capacity in the existing medical centres nearby (the Sheen Lane Centre and Kew Retail Park) to accommodate the increase both here and at the Kew Retail Park development. The Council will no doubt expect the applicant to make a financial contribution towards any necessary expansion of the medical centres under the Section 106 agreement.

In conclusion it is clear that the proposed development cannot be served by the existing infrastructure. We note that the London Plan Policy D2 states that “the density of development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels.” But there are no future planned levels of infrastructure pertaining to this site except for the left turn at Chalkers Corner which we believe will have only minimal effect.

In addition, we would like to draw attention to the following report in The Times on 6 Dec 2022: “Councils will no longer be forced to comply with mandatory house-building targets... Under a deal agreed between Michael Gove, the Housing Secretary, and senior Tory rebels, local authorities will be allowed to build fewer homes if they can show that meeting centrally imposed targets would significantly alter the character of their area.” In our view the change in the character of the area will indeed be significant as argued in the next section.

Urban design, building heights and heritage

We note that the DRP in its earlier letter of 20 Oct 2021 is “generally supportive of the original master plan” and we agree with this in that the building heights on the whole adhered to those in the Planning Brief of 2011, albeit not along the riverside where they should have been set back to allow more light to reach the towpath. In January this year we have seen the Draft Local Plan Update and its sketch in Appendix 3 proposing a 7-storey limit running east-west across the site with 5-6 storey edges similar to the height limits shown in the Planning Brief – and we agree with this.

The hefty increase to 9 storeys encouraged in the Mayor’s office last year resulted in harms to the heritage assets on, and near, the site which the Mayor recognised in his reasons for refusal. The latest plans show reductions in heights in the setting of the Maltings – we accept that this is an improvement but we would rather see adherence to the heights in the Planning Brief and Local Plan Update. **In our view the proposed 8- and 9-storey buildings are in conflict with the London Plan Policy D9.C(f) as they do not protect and enhance the open quality of the river, also with Local Plan Policies LP2 and LP3 by nature of their bulk, scale and design still detrimentally affecting the character and the setting of the Mortlake Conservation Area and nearby heritage assets.**

The DRP questions the scale and length of some of the larger ‘mansion blocks’, suggesting a finer grain where blocks might be divided, providing a finer network of routes between and in part resolving issues of massing and aspect. We still have issue with the serried ranks of riverside elevations on the eastern part of the site which create a barrier rather than drawing people in and through the site – hard angles and massing that fail to integrate the development with the local environment.

The DRP accepts the reduction in height of the buildings behind Thames Bank from 4-storey apartments to 3-storey terraced housing, and so do we – provided there is no daylight/sunlight infringement at the back of Parliament Mews.

We also note that the DRP in its same letter felt “the main desire line for pedestrians from the south and station along Sheen Lane towards the River Thames is obscured by the extension of Block 6... instead, the view corridor to the river and the Maltings is more significant and a minor adjustment to the masterplan would reap real benefits.... pedestrian improvements to crossing Mortlake High Street by removing the roundabout would be very beneficial.” We note that the green corridor to the river in the Planning Brief was wide enough to include this desire line but instead the corridor became narrowed further west. It is an important issue that should have been discussed four years ago but it does not appear to have been pursued further in the DRP’s follow-up letter.

Affordable housing

The percentage of affordable housing does not appear to have been raised by the DRP and maybe it was not in its remit. The GLA increased the affordable housing from 17% approved by the Council to 28% (units) but not without a significant overall increase in the number of units from 813 (plus 80 care home units) to 1,250. The latest scheme (March) showed a reduction to 1,085 units resulting in 20% affordable and there are now further reductions to 15% with a very small element of social rent. This is clearly in conflict with the London Plan Policy H4 and Local Plan Policy LP36 which show a target of 50% affordable.

The DRP has suggested the inclusion of affordable housing in the eastern part of the site fronting Mortlake High Street and we agree with this. The DRP is apprehensive about the height of this development and we support the newly proposed reduction of the height to 6 storeys.

Climate change

There are two key issues here. The first is the extent of greenery. The DRP indicates that the current "Urban Greening Factor is low for this type of scheme and the team needs to push harder." It is particularly concerned about the limited opportunities for planting above the basement carpark and urges "for the landscape to reduce the proportion of hard areas and to increase the soft." We agree with this and we also see the need for more soft ground to absorb heavy rainfall.

The second issue is the change from gas boilers to heat pumps and we support this.

However, we have an additional concern as expressed in our last representation to the Mayor, namely the potential flood risk from a freak (alias 'grey swan') event in the river, namely a storm surge from the North Sea as predicted by Horsburgh et al 2021. The defence works proposed on the Brewery site could exacerbate the flood risk to the east along The Terrace to Barnes Bridge and inland as far as Mortlake Station and we recommend that complementary defence works are funded along this stretch of the riverside through extension of the Section 106 agreement.

Conclusion

While we welcome some of the improvements that the applicant has made, we feel that our remaining concerns, which we share with the DRP, outweigh these improvements and accordingly we object to this new application.

B. The Secondary School and Sports Pitch (22/0902/FUL)

The Mortlake with East Sheen Society continues to raise concern about the appropriateness of this site for a secondary school for the following reasons:

- The site is too cramped, it does not meet the DfE's space standards for this part of London and the school will add to the cumulative density of the overall site which is akin to a central London location.
- Accessibility is poor in that students travelling by bus from Barnes in the morning peak will be caught in gridlock, those travelling from Kew have a somewhat limited bus service and those travelling from East Sheen will use their bikes or their feet and will encounter a serious capacity problem at the Sheen Lane level crossing where problems already exist with the arrival at 8.30am of the Thomson House School children – see photos in Appendix

C. We are not convinced that this capacity problem has been sorted **and, in our view, the proposed development is accordingly in conflict with the London Plan Policy S3B9(2).**

- The replacement of grass playing fields with an all-weather surface, fenced in and floodlit, and the re-provision of this OOLTI into a fragmented layout of open spaces does not meet the Local Plan's criteria of quality, quantum and openness (**LP14 para. 5.3.6**). And our fear is that the courtyard spaces will become private, not public.

At the same time we are becoming increasingly concerned that this school is no longer needed for the following reasons:

- In the aftermath of the baby boom of 2008-12 there has been a significant drop in numbers in local primary schools and this will soon become apparent in secondary schools as well.
- The predictions made by AfC when arguing the case for the new secondary school several years ago can now be checked against actual numbers, and shown to be inaccurate.
- The proposed school is likely to draw students away from the two existing nearby secondary schools (RPA and Christ's) and the inclusion of a new 6th form could have a negative impact on the viability of the 6th forms at the other two schools, indeed all three 6th forms could be unviable.

We are also concerned about the difficulties that Thomson House School currently faces because of being in two buildings on either side of the busy Sheen Lane level crossing, with one building having no outside space whatsoever. Thomson House School should never have been located here. The Planning Brief for the Brewery development in 2011 included a primary school alongside the grass playing fields. That is the perfect location for such a school, not where currently located on either side of the second most high-risk level crossing in South East England.

Finally, we should mention we are aware that the Council's Education Committee has agreed to postpone a final decision on the need for the secondary school pending the outcome of the latest update of the School Place Planning Strategy which is yet to occur.

Conclusion

We object to this application on the lines given above, namely the cramped conditions, the poor accessibility and the poor re-provision of the OOLTI, and we also challenge the need for the school and await the outcome of the Education Committee's deliberations on this matter.

APPENDIX A

MESS Brewery Consultation Poll Results 9 May 2022

DK = don't know/not sure

Percentages might add up to more or less than 100% due to rounding

Positive changes

Do you agree that density reduction from 1,250 res. units to 1,085 and hence reduction in height is a positive change?

Y 91%
N 5%
DK 5%

Do you agree that heritage assets being given more respect is a positive change?

Y 84%
N 5%
DK 11%

Do you agree that more neighbourly 3 storey terraced housing being re-introduced to the rear of Thames Bank is a positive change?

Y 93%
N 0%
DK 7%

Do you agree that the modification of the riverside massing and introduction of a variety of brickwork and tones is a positive change?

Y 76%
N 7%
DK 18%

Do you agree that the introduction of affordable units on Mortlake High Street is a positive change?

Y 64%
N 11%
DK 24%

Do you agree that the more sustainable energy strategy - heat pump technology instead of gas-fired CHP - is a positive change?

Y 80%
N 11%
DK 9%

Remaining Concerns

Do you agree that the cumulative density of housing plus flexible floorspace plus school is still a concern?

Y 89%
N 7%
DK 4%

Do you agree that building heights still exceeding those in the Planning Brief and in the latest Draft Local Plan are still a concern?

Y 85%
N 11%
DK 4%

Do you agree that the impact of additional population on Mortlake's services is still a concern?

Y 93%
N 7%
DK 0%

Do you agree that only 22% of housing being affordable is still a concern?

Y 58%
N 20%
DK 22%

Do you agree that segregation of affordable housing from rest of housing is still a concern?

Y 69%
N 16%
DK 16%

Do you agree that the loss of grass playing fields and inclusion of land reserved for bus turnaround is still a concern?

Y 91%
N 6%
DK 2%

Do you agree that courtyard spaces becoming privatised is still a concern?

Y 64%
N 13%
DK 22%

Do you agree that traffic congestion and air quality problems are still a concern?

Y 100%
N 0%
DK 0%

Do you agree that pedestrian/vehicle conflict at school arrival time in morning peak is still a concern?

Y 93%
N 7%
DK 0%

Do you agree that dangers at Sheen Lane level crossing are still a concern?

Y 98%
N 0%
DK 2%

Do you agree that flood risk is a concern?

Y	71%
N	6%
DK	23%

Should the secondary school still go ahead in this location?

Y	3%
N	72%
DK	26%

APPENDIX B

Typical Traffic Conditions in the Morning Peak in Sheen Lane, Mortlake High Street and Lower Richmond Road

Photographic Survey 17 May 2017, 8.15-8.45am



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



Same view in the evening



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 (to become entrance to proposed secondary school)



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 C

Pedestrians at Sheen Lane Level Crossing at 8.30am on a Typical Weekday Morning

