

Executive Summary - MBCG Response to Stag Brewery Planning Applications

The Mortlake Brewery Community Group (MBCG) is an umbrella group of residents and representatives of local organisations with a common interest in ensuring that the redevelopment of the brewery site provides a new village heart for Mortlake with buildings and public spaces of the highest quality. This response has been prepared by the MBCG and many experts in various planning related professions and in conjunction with the planning consultants Harwood Savin Ltd. (Refer to Chapter 2 for more details).

In reviewing the planning applications, we refer to a number of planning policies and documents including the 2011 Planning Brief. (Refer to Chapter 3 for more details).

Overview

The MBCG is supportive of re-development of the Stag site and sees regeneration as an opportunity to put the village heart back into Mortlake and assist in meeting both local housing needs and contribute to London's wider housing mix and needs.

While we acknowledge there are positives aspects of the design (opens up the site, provides a green link, helps to address the local housing needs), there remain very significant areas of concern which, if not addressed, will have a detrimental impact on the existing and new residents and to which we formally object:

- The cumulative density of the site is overwhelming and overbearing
- The local infrastructure cannot accommodate the increase in traffic
- There is no strategy for improving the public transportation to help alleviate the situation and importantly, no plan to address the issues of the level-crossing
- Loss of protected sports fields and inadequate protection and/or re-provision of the OOLTI – land on the Brewery site and at Chertsey Court
- The level of affordable housing is below the targets set by the mayor and Richmond Council
- There is no plan to address the increased demand for NHS facilities
- The size of school is too large for its plot and will create sub-optimal experience for its pupils

While policies seek to 'optimise' housing output for different types of location, the London Plan also recognises that residential development and densities need to take into consideration 'local context and character and public transport capacity'. Thus, this planning application needs to be reviewed within the context of the physical barriers of the site (the river Thames and the railway line) and the poor level of public transport.

Development Proposal and Design

The combined density of the scheme remains a major concern: there are 897 residential units (including potentially 150 assisted living units and 80 care home rooms), a 1,200 pupil secondary school and 11,616 sq. m. of commercial uses (retail, gym and office etc.). The brewery site represents about 15% of Mortlake in spatial terms **but** proposes an increase in the population by circa 40%. (Refer to Chapter 4). Particular aspects of concern:

- The eastern half of the site is extremely dense (2.6 times more dense than other areas of Mortlake) in layout far exceeding the GLA's existing London Plan guidelines on development

density and materially exceeding that proposed in the 2010 Barefoot consultation materials and in LBRuT's Monitoring Report on Housing.

- The heights of some of the buildings significantly exceed those set out in the 2011 Planning Brief and do not in all cases reduce at the perimeter of the site and along the riverside.
- The compressed layout (13.5m separate some tall buildings) and building heights place many, and large proportions of the external open spaces and tow path in permanent shadow. There is also an impact on existing residents. Any detrimental effect (loss of light) on existing properties, particularly in the north west of the site, will need to be further assessed
- The design is urban in nature and is out of character with Mortlake's sub-urban nature.
- We welcome that the proposals include a broad mix of residential, commercial and community uses. However, we question the viability of the number of retail outlets, cinema and gym given the proximity of similar businesses
- The area of land allocated to the school is not sufficient; it will provide a sub-optimal experience for pupils. If a school is to be built on this site, then it needs to have a smaller capacity or more land needs to be allocated.

The density of the site, number of residents and visitors will have a significant impact on traffic. We strongly disagree with the statement in the Town Planning Statement that 'the calculated residential density is acceptable in planning policy terms'.

Traffic and Transport

In recent years, much new accommodation has been built in Mortlake and Barnes – the traffic congestion has steadily become worse. While the building may have been piecemeal, the impact on traffic has been cumulative. There has been little improvement to local infrastructure to accommodate this increase (Refer to Chapter 5).

Similarly, with this development, there is no strategic approach to resolving traffic congestion – there needs to be a co-ordinated plan with TFL and the Council. The size of this development will exacerbate a worsening situation with harmful impacts affecting all road "users" including bus passengers, pedestrians and of course people living by them. Current residents (and new site users) will struggle to gain access to the Lower Richmond Road at peak times. There are four major traffic and transport concerns related to this application:

- The cumulative density of the site and large school will substantially increase the number of vehicles and people movements
- The proposals for widening the Chalker's Corner junction will not have a lasting impact on traffic reduction or ease movement/access
- There are no proposals to deal with the increased pressure on the Sheen Lane level crossing
- There is no public transport strategy

Based on our own independent survey and analysis, we estimate that this development will result in an additional 450 to 650 vehicles on the Lower Richmond Road. The School accounts for approximately half of this traffic increasing movements at morning peak hours, particularly by public transport and bicycle. There is a significant difference between the new traffic generation forecast by the Applicant and by MBCG; there is potentially a significant underestimate of the impact this development will have on local infrastructure. There are also problems with the stability of the traffic modelling tool and there are some additional tests we would expect to be included in the Traffic Assessment.

The Chalker's Corner changes will not resolve the issue of increased traffic but will simply attract further through traffic when other roads are congested. The evidence made available about the traffic effects of the Chalker's Corner proposal appears inconsistent and incomplete. A partial "improvement" of road traffic capacity at Chalker's Corner runs counter to current mayoral policy objectives. This junction complex is a strategic roads issue and not a local one. It should be Transport for London that takes the lead on any scheme here and focus on improving the efficient performance of its own roads.

The proposals to change the junction at Chalker's Corner will move the traffic closer to the residents and will increase pollution and noise with a loss of mature trees and OOLTI land.

There is no plan to address the pedestrian and vehicular risks at the Sheen Lane level crossing. The development at the Stag Brewery, particularly from the school, will increase numbers of pedestrians and cyclists seeking to cross the railway either by the footbridge or at road level is of very serious concern and must be addressed by including some material improvement in safety conditions at the level crossing. **The planning application needs to address this in conjunction with the Borough and Network Rail; a significant contribution of the costs of providing this material improvement should be secured through a s106 agreement.**

Public transport in this area is extremely weak compared with surrounding areas. The site is served directly by one infrequent bus route; this will need to deliver some of the additional 2,600 am peak-time people movements. There is no evidence to suggest how a reliable increased service will be delivered.

The proposals do not include a strategy for improving public transport. Public transport accessibility will be further decreased if the frequency of the 209 bus service is reduced, as proposed by TfL to accommodate the increase of the 493 bus service. **There needs to be a comprehensive people and transport survey of the whole Mortlake area and those areas from which LBRuT anticipates people will commute to the site and an integrated transport plan included in this planning application.**

Current transport policy emphasis is to improve active travel accessibility levels and to ensure active travel outcomes by improving walking and cycling conditions and reducing and or pricing on-site parking. The intentions of the original 2011 Planning Brief for this development were to apply a suitable and sustainable transport solution. This is not being delivered with this proposal where emphasis is still being given to providing ample car parking and road capacity increases.

The application needs to be more ambitious in reducing the impact of traffic by restricting car use in tandem with improving public transport access to the site.

Protection of Green Space

The 2011 Planning Brief is absolutely clear on the retention of the OOLTI designated sports fields and the creation of the Green Link. The Mayor's strategy to open space and the London Plan both seek to protect existing open landscape and the Greater London National Park City initiative seeks to protect existing open space and also recognises the importance of landscape absorbing pollution. (Refer to chapter 6).

The playing fields, which represents 53% of the open green spaces in Mortlake, and the land at Chertsey court lost as part of the proposed Chalker's Corner junction changes are protected under the classification of 'Other Open Land of Townscape Importance' (OOLTI). While protection is not

absolute, it is certainly not clear from the plans how the developer will meet the criteria which allows development to occur, namely:

- The quantum element needs to be re-tested excluding non-OOLTI elements
- The quality criterion is not met: nowhere on the site is there an area where two football matches can take place simultaneously.
- The openness is also highly questionable, when assessed (as it is required to be) from the perspective of views on to and across the playing fields.

The applicant and the Town Planning Statement state that the landscape provision in the 2011 Planning Brief is exceeded. We dispute this assertion and the basis of its calculation. The inclusion of the large secondary school and sixth form and its proposed siting and resultant removal of the existing sports fields has further diminished the vision for quality open space in the 2011 Planning Brief. We strongly challenge that the design and development proposals accord with London Plan and Richmond Council policy and is compliant with the 2011 Planning Brief.

The loss of the two grass playing fields, which the Council previously indicated it would require to be retained, will prejudice users (one pitch instead of two), neighbours (through floodlighting and traffic), and our ecosystems and may negatively impact flood water protection. It also fails to respect the natural beauty of Mortlake, and the introduction of fences and barriers will impair the current open aspect of the site. The planning application fails to assess a reinforced grass option: ESFA, Sport England and Sport Richmond's views on this have not been canvassed.

Education

LBRuT's requirement that the applicant depart from the planning brief to replace a small primary school with a large secondary school creates a clear tension between housing, school and green space that has not been properly addressed. There is not sufficient space for all to be delivered in the current form. (Refer to Chapter 7)

There is concern of the council's shift from primary to secondary school without proper consultation and whether all possible alternatives for a new secondary school have been properly considered. Furthermore, our preliminary research raises questions over the quantum of secondary school demand and proposes a range of supply options that require further evaluation but appear better-suited to meeting anticipated demand.

We recognise that a smaller secondary school size may not be fit for purpose, is not what the community wants and, if the number of pupils is reduced below 600, would become financially unviable. However, a school of the size proposed is too big for the plot and does not provide sufficient out door space for 1,200 pupils to circulate and participate in sporting activities.

A school of this size will have a significant impact on the number of people movements by car, public transport, bicycles and on foot. We don't believe that the full impact of this has been fully assessed on the local infrastructure, the level crossing and public transport.

There needs to be a proper assessment of the need and right location for a new secondary school accompanied by a robust transport impact assessment.

Affordable Housing

The **affordable housing provision** proposed at just 20% is lower than the council's guidelines. It is also proposed to be concentrated in one area and delivered late in the development which will risk

the provision is further reduced over time. There needs to be a higher provision which should be delivered across the building phases and across site locations. Our examination of the Financial Viability Assessment strongly indicates that the developers have sufficient margin to offer up to 35% of affordable housing on the Mortlake Brewery site. (Refer to Chapter 8)

We wish to record that we strongly disagree with the assertion that “there should be no requirement for any form of viability review after grant of planning submission”. This statement needs to be rejected as is unreasonable and unrealistic. We urge the Council to rigorously scrutinise this statement in line with their own policies and recent policy and guidance from the Mayor’s Office.

Community and Health Space

There is no **additional NHS care or primary school provision**; existing services will struggle to meet this additional demand, particularly as a number will be elderly in the care units. On-site provision is required: a s.106 contribution will not be adequate for a development of this size where we now there already inadequate local options for such services.

The allocation of the Maltings ground floor for community use is a welcomed proposal. However, the current layout of the ground floor needs to be re-examined. In its current design it is not sufficiently flexible to be used for multiple purposes and would make it difficult to be a venture that can support itself financially. Additionally, the space allocated for the Boathouse appears very constrained space for long rowing boats and ancillary space. (Refer to Chapter 9)

Environmental Impact Assessment

- **Demolition and Construction.** There needs to be a more rigorous assessment of the alternative method of transportation of all demolition waste, excavated soil and construction materials via the river instead of the road and the benefits this would accrue to residents of Lower Mortlake Road
- **Air Pollution.** There is no assessment of the other toxic gases (benzene, carbon monoxide, lead, ozone and sulphur dioxide) in accordance with EC Directives and their impact on air quality; no rigorous account of the assumptions made about the potential decrease in pollutants resulting from any increase in electric vehicle use; no indication of how long it would take for new planting at Chalker’s Corner to become effective as an absorber of air pollution.
- **Ecology.** There is no assessment of the loss of the grass playing fields as a food resource for birds.
- **Visual.** There is no assessment of the impact of the proposed reconfiguration at Chalker’s Corner.
- **Daylight/sunlight.** There is insufficient consideration of the overshadowing of the river, towpath and open riverside spaces caused by the proposed housing blocks. However, to the extent there has been analysis, this reveals that ‘... there are isolated significant effects to the neighbouring residential properties.

We urge the Council to ensure that these gaps in the environmental impact assessment are addressed (Refer to Chapter 10)

Other Procedural Matters

The MBCG with other members of the community has been involved in the consultation process. The consultation CLG meetings left little room for discussion as they were mainly monologues with

the architects and consultants presenting their designs. We acknowledge that there were alterations to the design during this process, however, these just realigned the design with the 2011 Planning Brief and other planning policies and/or were subsequently reversed.

We feel that there have been inadequate responses on the main issues that were raised and dominated most meetings. (Refer to Chapter 11)

In Conclusion

We remain supportive of the 2011 planning brief's proposals which has a good balance of housing (including affordable), commercial/retail units, green spaces extending from Mortlake Green to the river, while retaining some of the historical aspects of the area. In complying with the principles of this brief, the development would be an asset to the local community. As outlined in this executive summary, the accompanying sections and the formal Conclusion (Refer to Chapter 12), we have the remaining objections:

- high cumulative density
- Impact on traffic and public transport
- Efficacy of the Chalker's Corner proposals
- Size of the school
- Protection of the OOLTI green spaces
- Provision of NHS facilities
- Level of provision of affordable housing