

Further Statement in relation to the Inspector's Issues and Questions

My name is Tim Catchpole. I am the Planning Representative of the Mortlake with East Sheen Society (MESS). The Society was founded in 1969 in order to protect and enhance the urban and natural environment of the area for the benefit of its residents. It makes representations to the Council on planning reports and on applications for planning permission and it organises a programme of social events, lectures, walks and visits to places of interest. It has about 300 members.

I made representations on behalf of the Society on both the Pre-Publication Local Plan in August 2016 and on the Publication Local Plan in February 2017.

My further comments relating to the Inspector's issues and questions scheduled for the Public Examination commencing on 26 September 2017 are as follows:

Hearing 1: 26 Sept – Morning

Legal Compliance, Spatial Vision and Strategic Objectives

8. Does the Plan contain a positively prepared, clear and justified vision for the Borough? How have reasonable alternatives been considered and discounted?

In addition to making comments on the Pre-Publication and Publication editions of the Local Plan MESS has been involved in the preparation of a vision for the Borough through participation in both the Mortlake and East Sheen Village Plans. There were no alternative visions as such for these plans – and there did not need to be. There were, however, alternative visions for two development sites within this area, namely the Stag Brewery (SA24) and Barnes Hospital (SA28).

MESS has been involved alongside the Mortlake Brewery Community Group (MBCG) in discussions with the Borough Council about its vision for the Stag Brewery. We showed concern that the Council had identified the playing fields on this site as appropriate for a new secondary school without having considered alternatives. We asked for proof that alternatives had been considered and received none, so we presented our own alternatives to the Council and received comments. We consider that the best location for this school has still not yet been satisfactorily resolved. This will be addressed at Hearing 8 on 12 October.

MESS has kept a watching brief on Barnes Hospital. Development options for this site have included a primary school, to which we have objected on grounds of poor accessibility. This will likewise be addressed at Hearing 8 on 12 October.

10. To what extent... has the Sustainability Appraisal (SA) informed the content of the submitted Plan?

We note that the SA has indicated “overall positive impacts” for the Stag Brewery site but that “there would however be some impacts on local transport provision and the strategic road network as well as potential impacts...on biodiversity, landscape, townscape and parks and open spaces.” It does not indicate, however, how such impacts can or will be mitigated.

**Hearing 2: 26 Sept – Afternoon
Community facilities**

2. Is LP 29 (Education and Training) based on robust evidence of needs and existing provision? Is it flexible and will it be effective in delivery?

LP29 includes the following wording: “the Council will work with landowners and developers to secure sites for pre-schools, primary and secondary schools as well as sixth forms to ensure sufficient spaces can be provided for children aged 2-18.” MESS is aware of the Council’s School Place Planning Strategy. We have come to accept that a suitable size of secondary school can be accommodated on the Stag Brewery site but not on its playing fields. This issue will be addressed at Hearing 8 on 12 October.

There is no text in the LP29 policy statement indicating the appropriate site conditions required for a school. We suggest the following should be added: “**Sites should be reasonably spacious with good accessibility by road and, in the case of secondary schools, by public transport and cycling, whilst also being sufficiently distant from roadside pollutants.**”

It is noted that the Council in its response to MESS’s comments on the Pre-Publication Local Plan indicated that issues of accessibility would be addressed in a Travel Plan. We take a sceptical view of this.

We also pointed out that it would be useful for LP29 to be accompanied by an appropriate map showing the location of secondary schools in the Borough. The Council’s response was that such a map will appear in the Infrastructure Delivery Plan. But why not in the Local Plan?

5. Is the approach to public open space, play space, sport and recreation justified by a sufficiently robust evidence base?

As the population increases, so there should be an appropriate increase in provision for sport and recreation, but LP31 does not consider the space requirements for the different sports. Grass football pitches used for 6 hours a week can be replaced by all-weather surface pitches usable for 36 hours a week but the same cannot be said for cricket fields and rugby pitches which must remain on grass. Evidently there has been a recent loss of cricket fields in the

Borough and the cricket field on the Brewery site is likewise threatened with loss. When it comes to making distinctions between the different needs and space requirements for the different sports the evidence base for LP31 is indeed insufficiently robust in this regard.

**Hearing 3:27 Sept.
Housing**

1. Should housing targets be referenced clearly as minimums? Are the ranges shown in LP34B minimums?

The range shown for East Sheen, Mortlake and Barnes Common and Barnes wards is 400-500 new units for 2015-2025. We have queried this figure as it appears not to have included anticipated units for the Stag Brewery site (SA24). The Council's response is that a provisional figure is contained in the detailed future supply for large sites set out in the AMR Housing Reports – but it has not indicated this provisional figure nor explained why it has not been included. Presumably it is because there is no guarantee that there will be any housing on the Stag Brewery site by 2025?

**Hearing 5: 9 October
Character and Design**

2. Is LP2 (Building heights) positively prepared, justified by the evidence base and consistent with national policy....?

In our comments on the Publication Local Plan we indicated we would reserve our judgment about having a tall building on the Stag Brewery site for when the plans were exhibited. We saw the exhibition plans in March and a tall building was included. At the second exhibition in July the tall building had gone.

4. What is the evidence base underpinning the Views and Vistas referred to within LP5?

We note that the LP5 supporting statement says: "the protection and enhancement of the strategic view from King Henry's Mound to St Paul's will be achieved by consultation between boroughs." MESS has been closely involved with the protection and enhancement of this view since it was re-discovered after 36 years of neglect in 1976 and is shocked to see that after 40 years the view has finally, unexpectedly and unbelievably been forever ruined. The consultation that should have occurred was not "between boroughs" but between the Borough and the culprits namely the GLA and the London Legacy Development Corporation (formerly the Olympic Development Authority). The supporting statement needs to be amended accordingly.

7. What is the justification for LP11 (Subterranean development and basements) and is it consistent with national policy?

MESS has had ongoing discussions with the Council about planning applications for basement extensions which can cause horrendous problems for neighbours, but we have reluctantly come to accept that there is nothing that can be done to refuse such applications as applicants will win on appeal with costs awarded against the Council. Instead Our Society is campaigning for the introduction of a basement tax – similar to the window tax of the 18th century – in order to provide funds for compensating long-suffering neighbours.

**Hearing 6: 11 October morning
Economy and Employment; Borough Centres**

6. What robust evidence supports LP42 (Industrial land and business parks) and how will it be implemented effectively?

In our comments on the Pre-Publication Local Plan we indicated that no industrial land and business parks had been identified in Mortlake and East Sheen, that rents are very high in this area, and that there is concern about the absence of a service industry here. The Council's response was that our area does not contain industrial areas of a sufficient size to allow the Council to identify "locally important industrial land and business parks" in the area. That said, it then drew attention to the redevelopment of the Stag Brewery which "will contain employment uses which the Council envisages to support local service industries." This response requires further elaboration.

**Hearing 8: 12 October
Site Allocation SA24: Stag Brewery, Mortlake**

Is the allocation justified by the evidence base with due regard to alternatives and in particular:

- ***The accessibility of the site;***
- ***The need for a secondary school;***
- ***The capacity of the site for mixed use development including housing;***
- ***The presence and use of the sports field;***
- ***The presence of heritage assets;***
- ***The deliverability of the redevelopment?***

It should be noted that the evidence base has expanded somewhat since submission of my representation on behalf of MESS on 15 February this year. The Inspector should be aware of the following:

1. A consultation document on the Stag Brewery site which was produced prior to the Planning Brief of 2011 and which came to my attention for the first time just after my

representation on the Publication Local Plan was submitted. The document shows four alternative land use arrangements for the site including anticipated numbers of dwellings which ranged from 390 to 560. The Planning Brief was based on the preferred alternative which comprised housing, community hub, primary school and retention of the playing fields, but the Brief did not in fact state the number of dwellings.

2. A leaflet produced by the Council in March 2017 just before the first exhibition of the developer's proposals explaining why the Council had decided to provide a secondary school on the site instead of a primary. This leaflet should have been produced in the immediate aftermath of the Council's decision to change the school from primary to secondary taken in late 2015 but it took the Council 17 months to get its act together. The developer claims to have been unaware of the Council's decision when the site was acquired.
3. A very thorough traffic survey undertaken by the MBCG's Transport Advisor on Wed 17 and Thurs 18 May 2017 and funded by MESS. The survey included all-day video coverage of the Sheen Lane level crossing and peak hour observation of traffic along Sheen Lane and Lower Richmond Road. The evidence shows very clearly the already critical safety conditions prevailing at the level crossing and the serious congestion on the local roads in the peak hour.
4. A report produced by Network Rail entitled 'Mortlake Level Crossing Risk Assessment' (July 2017), which shows the Sheen Lane crossing to be 'high risk'.
5. Evidence produced by Sport Richmond showing a serious loss of cricket fields in the Borough.

The wording of SA24 needs to be reviewed and revised in the light of this latest evidence base. We have considered each of the six bullets above and made proposals for rewording as necessary below.

The accessibility of the site

There is no mention of accessibility in the policy statement and the only mention is in the following bullet:

- "There may be an opportunity to relocate the bus stopping/turning facility from Avondale Road Bus Station to this site. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that, where possible, improvements to public transport facilities can be secured as part of any development proposal."

The transport survey undertaken in May shows that peak hour traffic is so congested that it would be inefficient for the 209 bus to travel beyond Avondale Road. As a result the bus turning facility, which was shown on the site at the exhibition in March, was deleted at the second exhibition in July.

The serious problem about accessibility, which has not been mentioned in SA24, is the way in which Mortlake is tightly bounded between the railway and river, thus putting huge pressure on

the only road through the area, vis. Lower Richmond Road. Vehicles exiting the site in the morning peak have difficulty in turning right into this road bound for Kew because traffic moving in this direction is gridlocked. The developers have proposed a realignment of the junction of Lower Richmond Road at Chalkers Corner in the expectation that it will ease the traffic flow whereas it is considered more likely to have only limited effect. Indeed the main effects would be negative ones, vis. the encouragement of extraneous traffic to use Lower Richmond Road and the loss of garden space and 18 trees in front of Chertsey Court, this site being a designated OOLTI.

We propose that the above bullet is changed as follows:

- **Due to the tightly bound nature of this site** the Council will expect the developer to work together with relevant partners, including Transport for London, to ensure **that the new development does not have a severe impact on the operation, safety or accessibility of the local and strategic highway network and public transport services** and that, where possible, improvements to public transport facilities can be secured as part of any development proposal.

The need for a secondary school

This is mentioned in the policy statement as follows:

“The provision of an on-site new 6-form entry secondary school, plus sixth form, is required.”

And in the following bullet:

- “There is a clear need for a new 6-form entry secondary school, plus a sixth form, in this area, as set out in the Council’s School Place Planning Strategy. Therefore the Council expects any redevelopment proposal to allow for the provision of this school.”

The Local Plan is silent regarding primary school provision. Because there had been no leaflet from the Council explaining the justification for a secondary school, the representation made on behalf of the MESS in February recommended that the primary school shown in the Planning Brief of 2011 should stay and that the secondary school would be better located at Barn Elms. However, since seeing the leaflet in March and since attending further meetings with the Council we have come to the realisation that primary school provision since 2011 has been met with the expansion of the East Sheen Primary and Sheen Mount and with the creation of Thomson House School (albeit extremely poorly located next to the Sheen Lane level crossing) and that secondary school provision now needs to keep pace with the primary.

We do not therefore object to a new secondary school provided that (a) it has a sufficient site area on a par with other such schools in the area and (b) if such a site area is not sufficient then the size of entry is reduced accordingly. Nearby secondary schools are the Richmond Park Academy (6-form entry plus sixth form) on a site of 3 ha approx. and Christ’s (5-form entry plus sixth form) on a site of 5 ha approx. The current proposal on the Stag Brewery site is for a 6-form entry plus sixth form on a site of 1.8 ha including all-weather football pitch, which is clearly disadvantageous compared with its neighbouring secondary schools and would contribute to a

massive overdevelopment of the site. In addition the large size of the proposed school gives rise to real concerns about the additional cycling and pedestrian demands in the area around the Sheen Lane level crossing and the general lack of local bus services.

Whilst the Council is claiming that a 6-form entry school would be more viable, we are of the view that such a size of school is not do-able alongside so many other proposed land use components and with such constrained accessibility.

We propose that the above policy statement is changed as follows:

The provision of an on-site new **4-form** entry secondary school, plus sixth form, is required.

And the above bullet as follows:

- There is a clear need for a new **4-form** entry secondary school plus a sixth form, in this area, as set out in the Council's School Place Planning Strategy. Therefore the Council expects any redevelopment proposal to allow for the provision of this school **on a site area that is on a par with other secondary schools in the area.**

This alteration will also need to be reflected in paras. 8.2.11 and 13.1.7 of the Local Plan.

The capacity of the site for mixed use development including housing

The policy statement indicates a range of appropriate uses including affordable housing. The bullets amplify this but there is no mention of capacity.

As indicated above, my attention has since February been drawn to the consultation document produced by the Council prior to the Planning Brief of 2011 and to the numbers of units shown as up to 560. As also indicated, there was no mention of the numbers of units in the Planning Brief itself. However, we have been advised that the densities of comparable riverside developments in Barnes and Kew at the beginning of this century should not be regarded as appropriate precedents in today's climate and that account should be taken of the GLA's Density Matrix, vis. 200-450 habitable rooms per hectare (HR/HA) for development in an urban setting with PTAL of 2 to 3. It is worth noting that the same developer has recently received planning permission for a comparable riverside development in Teddington, vis. the redevelopment of the Teddington Studios, at a density of 420 habitable rooms per hectare.

I have recently done a calculation of the density of the land use arrangement shown in the Planning Brief. By applying the GLA Density Matrix of 200 HR/HA for the 3-storey development, 400 HR/HA for the 6-storey and pro-rata HR/HA for other storeys, and by dividing by 3 to get average sized units, I have interestingly arrived at a figure of 560 units. However, this assumed that the existing playing fields and proposed extension of Mortlake Green to the river were excluded from the net residential site area. The developers showed 980 units at the exhibition in March and the 860 units in July, which infers that these open spaces have clearly been included, not excluded, in the net residential site area.

Be that as it may, the capacity here must surely be dictated not by the GLA Density Matrix (which in any case is a guideline) but by the capacity of Lower Richmond Road which is constrained by the Chalkers Corner junction at one end and by the Sheen Lane level crossing at the other.

We believe that the re-wording proposed under item 1 above (the accessibility of the site) should cover this capacity issue.

The presence and use of the sports field

This is mentioned in the policy statement as follows:

“Appropriate uses.... include.... sport and leisure uses including the retention and/or reprovision and upgrading of the playing fields.”

The words “and/or reprovision” did not feature in the Pre-Publication Local Plan and it was a sharp eye that had to discover these words had been slipped into the Publication edition. There is no amplification of what is meant by reprovision in the bullets – whether as grass or as all-weather on site or indeed off-site.

The sports field, all grass, comprises two football pitches and one cricket square located between them so that football can be played during the winter months and cricket in the summer. The Brewery staff used the sports field for both football and cricket. In recent years the Barnes Eagles Club, based at Barn Elms, and Thomson House School have used the football pitches in the winter but there is evidently no cricket club that uses the field in the summer. However, neighbouring cricket clubs such as the Richmond CC and Sheen Park CC have shown interest in using this ground but are not prepared to manage it. Management needs to be done by a Mortlake entity such as the Mortlake Community Association or the school that will be built on this site.

There has been much concern about the loss of cricket fields in the Borough in recent years. It seems that the Council has not taken into account the views of Sport England, Sport London or Sport Richmond.

The sports field is also used by the local community for an annual summer fair.

We propose that the words ‘and/or reprovision’ are removed from the policy statement.

The presence of heritage assets

This is not mentioned in the policy statement but is mentioned in the following bullet:

- “The site is partially within the Mortlake Conservation Area. The existing buildings of Townscape Merit should be retained; the reuse of these historic buildings offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy, for example by providing an on-site museum. Any development should respond

positively to the Conservation Area including the setting of the listed buildings (Grade II) to the north of the site.”

The first and last sentences of the above bullet did not feature in the Draft Local Plan and were added in the Pre-Publication edition. With these additions we feel that this bullet adequately covers the presence of the heritage assets as far as the ‘built’ heritage is concerned. But there is no mention in SA24 of the ‘natural’ heritage, namely the green spaces, OOLTIs and tree preservation orders. This needs to be rectified.

In this regard it should be noted that in meetings with the Council we have been told that OOLTIs are of secondary importance compared with Green Belt and MOL. I have not been able to find any reference to this in the Local Plan. In my view an OOLTI can be as important, if not more important. A London square, after all, is an OOLTI.

The deliverability of the redevelopment

There is no mention of this, neither in the policy statement nor in the bullets that follow. It is known that the developer would like to focus on the eastern end of the site first from Bulls Head Alley to Ship Lane. This would therefore become Phase 1. Land to the west of Ship Lane would therefore be developed as Phase 2 except, that is, for the school which the Council is keen to see developed as soon as possible in Phase 1.

Overall phasing and occupations should be governed by the realistic achievement of any highway and railway works deemed to be required.

We see no problem with this being added in as a final bullet.

Site Allocation SA28 Barnes Hospital

Is the allocation justified by the evidence base with due regard to the accessibility of the site and the consideration of alternatives?

The allocation is not justified because of the poor accessibility for a primary school. Indeed we have now heard that a planning application is imminent and that it will not include a primary school.

This alteration will also need to be reflected in paras. 8.2.11 and 13.1.7 of the Local Plan.