

From: Crookdake, Niki (Cllr)
Sent: 24 July 2023 17:21
To: Richmond Local Plan; Richmond Local Plan
Cc: Democratic Services; Andrea Kitzberger-Smith; Green Councillors Richmond; Abdus Choudhury
Subject: Comments on the Reg19 Local Plan
Attachments: 3-4-23 13 Place-based Strategy for Mortlake and East Sheen .pdf; 24-7-23 Local Plan comments - FINAL .docx

Categories: Consultation Response

Official

Dear Officers,

I attach my comments on the Reg19 Local Plan.

I have used the e-mail address on the Richmond website - localplan@richmond.gov.uk for submitting comments, as well as copying in relevant officers. I would be grateful if you could confirm receipt within the consultation period.

If you have any queries, please do not hesitate to contact me.

Many thanks,
Niki

Niki Crookdake
Green Party Councillor for Mortlake & Barnes Common

To contact me please text [REDACTED] with your details & I will call you back

IMPORTANT

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Reg 19 Local Plan Comments

Niki Crookdake, Green Party Councillor for Mortlake and Barnes Common

Summary

Comments of the Reg19 version of the Local Plan are set out below in three sections:

1. Section 23 - Reducing the need to travel and improving the choices for more sustainable travel;
2. Section 17 - Delivering new homes and an affordable borough for all;
3. Section 24 - Securing new social and community infrastructure to support a growing population; and
4. Section 13 - Place Based Strategy for Mortlake & East Sheen.

Each section includes comments on the text, an explanation of why the comments have been made and a list of relevant NPPF, London and Local plan policies and other evidence that has been referred to.

The comments on each section, although separate, are connected as they arise from an unwillingness by the administration to engage in discussion on the Local Plan about the unprecedented development in the East of the Borough. This is possibly because the draft plan incorrectly forecasts a lower level of development than is anticipated. This has resulted in the cumulative impact of the four developments not being properly considered together.

As a result, I would respectfully ask the Planning Inspector to consider if:

- The current Transport Strategy, based on evidence over 5 years old, should be reviewed, as it is not based on up-to-date evidence as required by NPPF policy 31 and 33, and therefore is not sound, as required by NPPF policy 35.
- The potential conflict of interest referred to in section 17, is consistent with national policy as required by NPPF policy 35d.
- The amendments to the Education and Training Policy are consistent with national policy as required by NPPF policy 35d.
- Chertsey Court should be included as a site allocation because the rejection of this site was not justified as required by NPPF policy 35b. Alternate proposals, which could enable the delivery of more sustainable development, were not considered properly.

I would like to participate in any hearing sessions which discuss any of the points raised in this document. This is necessary, because, as the ward councillor, I have a good grasp of the issues affecting the East of the Borough and the evidence base which supports the Local Plan's needs assessments. I can therefore contribute to discussion relating to soundness from a position of knowledge.

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1. Section 23. Reducing the need to travel and improving the choices for more sustainable travel

a. Local Plan proposed amendments

Section 23 is included in pages 278-289 of the Local Plan. I have set out below extracts from this text, with suggested amendments highlighted in yellow and highlighted policy areas which are most relevant.

'Policy 47. Sustainable travel choices (Strategic Policy)

- A. The Council will work with others to bring about safe, sustainable, accessible transport solutions to reduce traffic congestion, reduce air pollution, including carbon dioxide emissions, improve public health, and improve access to services and employment in accordance with the policies set out in the London Plan, Mayor's Transport Strategy, and the Council's own Active Travel Strategy. Planning applicants will therefore be expected to:

Location of the development

- B. Propose major developments (see Table 1 for a definition) in areas that either already have a **Public Transport Accessibility Level of 4-6 or if not mitigate the impact of their development on the existing passenger transport network in accordance with Para. 110d of the National Planning Policy Framework (NPPF)**. Depending on the impact of the development relative to the capacity of the bus and rail network in its final assessment year, this may include applicants making financial contributions to increase capacity and/or improve infrastructure on the passenger transport network....

Assessing the impact of developments

- E. Demonstrate that their **proposed developments do not have a severe impact on the operation, safety, or accessibility of the local or strategic road network**. Any impact on the local or strategic road network, including the impact of occupants parking vehicles on the carriageway, will need to be mitigated in accordance with para. 110d of the NPPF.
- F. All planning applications for major developments will need to include a full transport assessment and travel plan which must be completed in accordance with Transport for London (TfL) guidance. Applications for smaller developments must include a transport statement and travel plan statement, also completed in accordance with TfL guidance (see Table 23.1). Applications under a certain size will be expected to include a chapter about transport and accessibility in their Design and Access Statement

23.2 The Council has a **Local Implementation Plan (LIP 3) adopted in 2019** detailing its vision for how the transport network will be transformed over the next 20 years. It includes a headline target for 75% of trips to be by sustainable modes (walking, cycling and public transport) by 2041, from a baseline of 61%. The plan also includes targets for expanding the cycle network, improving air quality, reducing road danger and increasing the use of public transport.

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23.4 Developments that will generate a large volume of trips should be focused in areas with high Public Transport Accessibility Levels (PTALs) to help create the most sustainable transport environment

23.14 .. Reference should be made to the priorities identified in the Local Implementation Plan.

23.16 All planning applications will be required to demonstrate that their proposed developments do not have a severe impact on the operation, safety, or accessibility of the local or strategic road network. *The cumulative impact of all site allocations anticipated in the plan, which have either received planning, are being assessed or have had discussions with the planning officers should be taken into consideration as completed developments when the cumulative impact on the area is being assessed over a forecast 15 or 30 year period, as required by the NPPF.*

23.24 **Delivery of transport infrastructure**, including the relevant proposed transport schemes as set out in the London Plan, is **critical to the delivery of the strategic objectives of the Local Plan'**

b. Reasons for the proposed amendments

In the wider area, there has been extensive development just north of Kew bridge, along the western corridor. In the East of the Borough, Hammersmith Bridge was closed in April 2019, and Sheen Gate, Richmond Park in March 2020. Mortlake, East Sheen, Barnes, and Kew contain a corridor hugely constrained by the river Thames, the railway and Richmond Park giving rise to regular and serious levels of traffic congestion causing both gridlock and safety risks at strategic junctions and hotspots such as the four level crossings at Mortlake Station, Manor Road, White Hart Lane and Vine Road and Chalker's Corner on the A316. The area is not Central nor Inner London and lies outside an Outer London town centre, with poor public transport accessibility. There remain major uncertainties over the future of Hammersmith Bridge and rail and bus service levels in the locality, some of which have recently been reduced.

However, there is unprecedented levels of development in the East of the Borough identified in the local plan site allocations at Homebase (29), Kew (31), STAG (35), and Barnes Hospital (38). Cumulatively, these sites are destined to add at least an additional 3,000 homes and more than 6,000 people living and working in the area, together with a new 1200 secondary school, 90 pupil special needs school and hospital.

All this will create a significant additional burden on the transport infrastructure in Richmond and the neighbouring boroughs of Wandsworth and Hounslow in particular.

The evidence for Richmond's Transport strategy is taken from Local Implementation Plan 3, which is based on evidence gathered in 2018, more than five years ago, before the closure of Hammersmith Bridge and Sheen Gate, Richmond Park and the change in travel patterns post the pandemic. The recent Urban Design study (2023) recommended the transport and social infrastructure in the East of the Borough needed to be reviewed, however this was not carried out. The 38 Transport priorities agreed by the Transport committee in November 2022 also made no reference to the Transport Infrastructure changes that might be needed in the East of the Borough to accommodate the developments, despite this being raised in the September 2022 meeting as a ward Concern. The infrastructure delivery plan, which is based on LIP 3, also makes no reference to the developments.

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In July '23, over 1,400 residents signed a petition asking for a review to take place, given the concerns over transport and the lack of evidence that the impact of the cumulative effect of the developments on the transport infrastructure had been considered, with or without neighbouring boroughs. A request for a review was also served as a petition on 6 July at the GLA, asking them to work with Richmond Council to consider this, as a matter of urgency, as three of the development sites had been granted planning permission in Richmond.

This area is not designated as an Opportunity or Growth Area by the Mayor and is therefore not included at London Level for transport infrastructure improvements. Furthermore, this area will not benefit from Crossrail 2, the Elizabeth line, the Bakerloo line extension or the west London orbital.

Developers own transport assessments, have not considered the cumulative impact of the developments as required by London Policy D2 and T4, but have instead concluded that their individual schemes have little impact on the transport network and therefore require little/no mitigation by way of improvements to the transport infrastructure.

Because the LIP3 transport strategy providing evidence for the infrastructure delivery plan is more than 5 years old and does not refer to any of the developments in the East of the Borough, there is no evidence that the cumulative, impact of the developments can be accommodated within our existing current transport infrastructure.

In line with NPPF Policy 33, Transport evidence in the LIP should be updated, so that the transport strategy is based on accurate and realistic cumulative transport forecasts from all proposed developments and advice from experts on the optimum way to mitigate these pressures. This has not been done adequately during the planning or local plan process to date in breach of the policies set out below.

Further, in line with the NPPF 22, and London Policy D2, the Local plan should be updated to explicitly state that in future, the cumulative impact of all site allocations anticipated in the plan, which have either received planning, are being assessed or have had discussions with the planning officers should be taken into consideration as completed developments when the cumulative impact on the area is being assessed over the next 15 years, in line with the requirement for forward strategic planning, and where the development is large enough, 30 years.

It is likely that the infrastructure changes have not been properly considered because the size of the unprecedented development in the East of the Borough is set out incorrectly in the Local Plan (see Housing below). However, when this was highlighted through the proper channels to officers and members over the last 15 months, rather than engaging on this and trying to resolve the issues, requests have been ignored and detailed written comments on the plan have all been rebutted, in breach of the local plan policy's commitment to work in partnership with communities.

I would ask the inspector to consider, if the Transport Strategy, based on evidence over 5 years old, is sound and should be reviewed.

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c. Relevant Policies and other evidence

<p>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</p>	<p>Strategic policies</p> <p>20. Strategic policies should .. make sufficient provision for.. b) infrastructure for transport ...</p> <p>22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</p> <p>Preparing and reviewing plans</p> <p>31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p>33. Policies in local plans ..should be updated at least once every five years ..and should take into account changing circumstances affecting the area, or any relevant changes in national policy.</p> <p>Examining Plans</p> <p>35. ...Plans are ‘sound’ if:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development ..</p>
<p>National Planning Policy (NPPF) Framework 2021 – Transport policies</p>	<p>104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <p>(a) the potential impacts of development on transport networks can be addressed;</p> <p>(b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;</p>
<p>London Policy D2 Infrastructure requirements</p>	<p>Infrastructure requirements for sustainable densities</p> <p>A. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.</p>

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	<p>B. When a proposed development is acceptable in terms of use, scale and massing, ... but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</p>
<p>London Policy SD2 Collaboration in the Wider South East</p>	<p>Mayor will work with partners to plan the necessary infrastructure to support 'good growth'. LAs have a duty to co-operate with other LAs to help plan any infrastructure changes required.</p>
<p>London Policy T4 Assessing and mitigating transport impacts</p>	<p>E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.</p>
<p>Urban Design Study 2023</p>	<p>Page 210 – the Impact of the increased density on existing social infrastructure and transport network needs to be assessed .. Page 235 – the consultations in East Sheen, Kew, Barnes and Mortlake identified a reduction in traffic and improvement in public transport as a current key area of concern and an area of most importance in future.</p>
<p>LIP 3 (consultation from Nov 2018 to April 2019)</p>	<p>Outcome 5: The public transport network will meet the needs of a growing London – states that Richmond will work in partnership with TFL, Network Rail and SW Rail to improve public transport across the borough .. Outcome 8: Active, efficient and sustainable travel will be the best option for new developments in areas with high levels of public transport accessibility (PTALs) e.g. Richmond and Twickenham centres. Reference to the fact that there are no Mayor designated Opportunity Areas for growth within the Richmond. Page 27 – reference to the correlation between areas with low active travel levels and low PTALs. Targeting these areas will be a priority for infrastructure improvements .. [for] walking ..cycling ..bus stops and ..rail stations .. Long term interventions to 2041 - no mention of the four developments around Chalker's Corner, or their cumulative impact.</p>
<p>Local Plan Policy Introduction</p>	<p>2.23 We cannot act in isolation and therefore work hand in hand with communities and local partners Our partner organisations and agencies ..[and] neighbouring boroughs as well as the Mayor of London, the Greater London Authority (GLA) and Transport for London (TfL), particularly where issues cross borough boundaries.</p>

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2. Section 17 - Delivering new homes and an affordable borough for all.

Section 17 is included in pages 166-189 of the Local Plan. I have set out below extracts from this text, with suggested amendments highlighted in yellow.

Richmond council appointed BNP Paribas to carry out a Whole Plan Viability Study referred to in Local Plan para 17.25 below, to ensure that developers who have to submit a Financial Viability Assessment (FVA) as part of their planning application, are able to fulfil plan objectives. At the same time, BNP Paribas, was appointed by the developers of the STAG Brewery site to negotiate the STAG site FVA with Richmond council. It is yet to be determined that full assurance can be given that the conflict has been managed correctly. An update is expected shortly.

a. Local Plan proposed amendment - 1

'Local Plan Policy 10 New Housing (Strategic Policy)

Table

Area Barnes & East Sheen, Description should read **'Mortlake'** as this is the development area. An estimate of 800-900 houses is significantly less than forecast, with **at least 1,200 homes** with planning permission achieved or in the assessment stage, from site allocations 34 – STAG Brewery and 37 – Barnes Hospital. This doesn't include development yields from sites 35 – Mortlake Delivery Office & Site 36 – East Sheen Telephone Exchange.

Area Richmond, Description should read 'Richmond & Kew' as this is the development area. An estimate of 1,100-1,200 is significantly less than forecast, with **at least 1,800 homes** from planning permission or in the pipeline including Kew Retail Park – 1,200 and Homebase – 453 homes.

Include new text:

C. A summary setting out the net contribution to housing split in the format below will be available at the top of each officer's planning application report and a total figure will be provided once a year to full council in July, at the last meeting before summer recess, with a comment setting out progress against targets within each category.

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	Studio 1P	1B1-2P	2B3P	2B4P	3B5P	3B6P	4B8P
Market sale							
Shared Ownership							
Min. £50,000 income							
Min. £70,000 income							
Min. £90,000 income							
Rent							
London Affordable rent							
Social rent							
	SSH	IL					
Market sale							
Shared Ownership							
Min. £50,000 income							
Min. £70,000 income							
Min. £90,000 income							
Rent							
London Affordable rent							
Social rent							
Note: SSH = supported or specialist housing, IL = independent Living							

Churn - optimum accommodation	2B3P	2B4P	3B5P	3B6P	4B8P
Number of under-occupied properties released					
London Affordable rent					
Social rent					
Number of over-crowded families rehoused					
London Affordable rent					
Social rent					

b. Reasons for the proposed amendment - 1

1,900-2,100 homes are anticipated in the Local Plan within 1 mile of Chalker's Corner, however current forecasts are at least 25% higher, with at least 2,800 new homes anticipated to be built in this locality. The underestimate and the incorrect area identification may have contributed to the lack of infrastructure planning (particularly for Transport) as required below under NPPF 31 and local plan policy 47 (see below).

In line with NPPF 34, a clear summary of the net contribution to the housing stock expected from any developments approved through the year, will enable progress against the targets set out in the Housing Needs Assessment to be tracked more easily, providing improved transparency. Currently this data is often difficult to find, particularly in the large developments, and is not always reported in the same a way, which makes collating totals difficult. Including this change would be consistent with National Policy.

a. Local Plan proposed amendment – 2

Policy 11. Affordable Housing (Strategic Policy)

D. Where on site affordable housing is provided on site, the Council will require an affordable housing tenure split of 70% affordable rented housing and 30% intermediate housing by habitable room.. ... **with priority for 3 and 4 bed social rented family homes and supported living developments.**

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17.25 The Council has rigorously tested their affordable housing targets to make sure that they are viable through what is called a Whole Plan Viability Study. It is confirmed that the policy compliant level of affordable housing required on sites is viable so the Council will not accept anything less. Applications submitted that provide less affordable housing than set out in policy will be rejected. The Council will in extraordinary circumstances and on a case by case basis accept viability arguments if it can be demonstrated that the site has abnormal costs that could not be foreseen, for example infrastructure provision that could not have been foreseen at The Whole Plan Viability stage and need to be considered on a site-specific basis taking into account variations between private sales values, scheme composition and benchmark land value. The Council will only accept viability arguments once it has been confirmed that the applicant has explored with the relevant Council officers the availability and application of grant to increase or provided a better tenure of affordable housing. *Modelling sensitivity will be undertaken using the developer's actual cost of capital to determine more accurately the profit which they are likely to generate on the scheme. This will inform negotiations on the level of blended profit agreed on the scheme.*

b. Reasons for the proposed amendment - 2

The LHNA identified the growth (in absolute terms) in 3 and 4 person households and the long waiting lists for affordable family accommodation. In line with national policy, the plan should be based on proportionate evidence, which states a need for 3+ family homes and supported living to, as identified in the LHNA.

In relation to the viability statement, developers actual financing costs are often very different to the generic rate, which can generate a significant uplift (if less) or reduction (if more) in actual profit. A calculation should be carried out which estimates the actual profit a developer expects to make on a scheme, so that this information can be used to inform blended profit negotiations.

a. Local Plan proposed amendment – 3

Policy 12. Housing Needs of Different Groups

17.44 ... Where a supported or specialised residential development is agreed, RPs will require the LAs agreement before changing this designation to independent living, in line with Policy 14 to reduce the loss of specialist accommodation.

17.47 We will work with developers to encourage key worker provisions as part of the eligibility criteria for housing if demand exceeds supply, in line with NPPF 4.60.

b. Reasons for the proposed amendment - 3

As many housing schemes have been reclassified by RPs from supported to independent living as a cost saving initiative, there should be a policy preventing RPs from changing the supported living designation without agreement from the LA. In line with national policy, the plan should be based on proportionate evidence, this change would support the LHNA need to retain specialist housing.

Ensuring we have sufficient key workers in the borough is essential for delivery of the Local Plan objectives and given the high housing costs in the private sector. In line with national policy, the plan should be based on proportionate evidence, this change, would support whole plan delivery.

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a. Local Plan proposed amendment – 4

Policy 13. Housing Mix and Standards

A Areas within PTALs 3-6 or within 800m distance of a station or town centre boundary should provide a higher proportion of **small units (studios and 1 beds)**. For market housing, there is highest demand **for 2 and 3 beds**. The affordable housing mix should be based on discussions with a

Registered Provider(s) to reflect local needs, in accordance with Policy 11 Affordable Housing. The housing mix should be appropriate to the site-specifics of the location **and in line with the LHNA priorities of 3 and 4 bed family housing for social rent and specialist accommodation**.

b. Reasons for the proposed amendment – 4

The reference to ‘small units’ and market 2 and 3 bed units does not seem to reflect the priorities identified in the LHNA below, where the identified need was social rent affordable 3 and 4 bed housing and supported housing. With private rents forecast to grow at the rates identified above, many families and vulnerable people will be priced out of the PRS and will require social rented accommodation. In line with national policy, the plan should be based on proportionate evidence, which would support this change.

c. Relevant Policies and other evidence

Relevant housing policies from the London Plan, NRRF and LHNA referred to above.

National Planning Policy (NPPF) Framework 2021 – Plan making and delivery	Strategic policies 20. Strategic policies should .. make sufficient provision for a) housing (including affordable housing) 22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. Preparing and reviewing plans 31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Development contributions 34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan. Examining Plans 35. ...Plans are ‘sound’ if:
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	<p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²¹; and is informed by agreements with other authorities</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development ..</p>
London Policy H11 Build to Rent	<p>4.11.7 Proposals that do not provide 35 per cent affordable housing at the required discount to market rents, or 50 per cent on public sector land, or 50 per cent on industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity, or that do not meet the criteria of Part C of Policy H5 Threshold approach to applications will be subject to the Viability Tested Route under Part E of Policy H5 Threshold approach to applications.</p> <p>4.61 – HNA – The London Plan policy on affordable housing tenure split requires at least 30% of the affordable homes delivered by a development scheme to be provided as London Affordable Rent or Social Rent and another 30% provided as intermediate 26 products such as London Living Rent and shared ownership, with the final 40% to be determined by the Local Planning Authority (LPA).</p>
NPPF 2021	<p>4.60 – HNA - Annex 2 of the NPPF also includes the needs of essential local workers ‘Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provided a subsidised route to home ownership and/or is for essential local workers’. Essential local workers are defined as ‘Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers’.</p>
Housing Needs Assessment 2023	<p>2.4 For prime suburban locations within the M25, which would include locations such as Richmond, they expect to see an 8.0% drop in values in 2023, with 1.0% growth in 2024. Over the 5 year period to 2027, Savills expect compound growth in house prices of 6.0%</p> <p>2.5 Their 2023-27 forecast for London is of rental growth of 18.4%, with over 5% growth pa in both 2023 and 2024.</p> <p>3.4 The 2011-21 period has seen a growth in households with 3 and 4 (+3,197 households – Table 3.2) persons (many of which will be families), with declining numbers of 1- and 2-persons households in absolute and relative terms despite the growing older population.</p> <p>3.19 Overcrowding is more prevalent in the Social Rented sector (1,121), and to a lesser extent in the PRS (1,392); .. 2,642 households in social rented homes as recorded by the Census who are under-occupying.</p> <p>4.7 .. points notionally to an 80%/ 20% split between rented affordable provision and affordable home ownership.</p>

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	<p>5.6 The Commissioning Statement focuses on the need for places funded by the Council, identifying a need for:</p> <ul style="list-style-type: none">• Approx. 80 additional extra care / residential care units to 2035 with no currently contracted extra care provision in the east of the Borough, with the residential care beds focused on those with dementia. Dementia-friendly extra care provision is identified as a particular priority;• ‘Care and cluster’ schemes of self-contained flats for adults with learning disabilities with 24/7 staffing and communal areas. A projected need for 31 units between 2019-35 is identified. .. There is a limited current pipeline of supported living schemes..• mental health difficulties, with a potential need for up to 100 units identified ..• A lack of specialist supported living or extra care provision for adults with physical or sensory needs in the Borough. <p>6. Housing Priorities ..</p> <p>6.2 Genuinely affordable housing and supported housing</p>
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3. Section 24 - Securing new social and community infrastructure to support a growing population.

Section 24 is included in pages 289-299 of the Local Plan. I have set out below extracts from this text, with suggested amendments highlighted in yellow.

a. Local Plan proposed amendments

'Policy 50. Education and Training (Strategic Policy)

A. The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by the following means:

1. supporting the provision of facilities to meet the needs for primary and secondary school places as well as pre-school, childcare and other education and training facilities, *based on a needs assessment including an audit of existing facilities, locally and sub-regionally, addressing cross-boundary issues, in line with NPPF policy no.31 and London Policy S3, Part A;*

2. safeguarding land and buildings in educational use;

3. identifying new sites for educational uses as part of this Plan, *particularly in areas with significant planned growth or need for specialist places (e.g.. alternative provision, further education including non-selective provision, or special needs);* 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;

4. encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs;

5. encouraging flexible and adaptable buildings, multi-use and co-location with other social infrastructure.

B. Early engagement is required with the Council (Achieving for Children) where there is a loss or proposed gain in pre-school, primary and secondary places; evidence of discussions between the Council (Achieving for Children) and providers will be required to demonstrate how needs will be met and should be submitted with an application.

C. Proposals for education and childcare facilities will be considered against the criteria set out in London Plan Policy S3 Education and childcare facilities *parts B and C.*

D. The Council will promote local employment opportunities and training programmes in accordance with London Plan Policy E11 Skills and opportunities for all and seek opportunities to support local procurement of goods and services. Where the employment opportunities generated by construction as well as the end use of the development create more than 20 (Full Time Equivalent) jobs, a Local Employment Agreement, secured through a Section 106 agreement, will be required. This will secure employment, training/skills development opportunities for local people. If it is accepted it is not possible to deliver this through the development, developers will be required to make a financial contribution to support local employment, education, and skills initiatives.

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24.39 Consequently, on all development proposals generating 20 FTE (,,) jobs or more .. the council will require a Local Employment Agreement *...The same obligation to employ locally and develop apprenticeships within all business areas, is also placed on the council itself, and its performance will be included in the targets and monitoring process.*

24.40 ... The number of jobs generated by a development will vary depending on its scale, as well as the end use being proposed. The obligation set out in part B of the policy for an LEA between the developer and the Council will therefore apply to

- All residential developments providing **10** units or more; and
- All commercial developments consisting of 400 sqm or more of employment space.

24.44 A developer can set out justification as to why it may not be possible to deliver any of the requirements highlighted, if there are *exceptional* circumstances specific to the scheme (e.g. specialised labour requirements from the end user) such that direct provision is not operationally feasible, or that an alternative means of delivery would result in a more effective outcome. There should be early engagement with the Council to discuss the specific circumstances of the scheme. If those circumstances are accepted by the Council, then financial contributions via Richmond Work Match towards local employment training schemes, job brokerage services or other business support initiatives will be required – related to the average cost to the Council of supporting and/or placing Richmond residents in jobs, training places and apprenticeships (an update to the Planning Obligations SPD will set out further details).

b. Reasons for the proposed amendments

Part A of the S3 London Plan Policy requires the Local Authority to liaise with neighbouring boroughs when planning education provision, under NPPF policy 26. The need for cross-boundary co-operation has been further strengthened by the appointment last year of a new London wide Regional Schools Commissioner and is particularly important in light of falling rolls across the capital. There can be no justification to delete this obligation, as currently drafted.

The proposal to delete Part A was a result of the reluctance of the school's place planning officer to include in his pupil capacity calculations, available secondary school capacity outside the borough, but within 3 miles of the STAG site. The proposal to include Part A is in line with national policy, and also supports effective cross-boundary working and the duty to co-operate.

There is cross-party agreement to enhance this policy so that developers and other council contractors employ and/or train residents. However, my preference is to further strengthen these provisions:

- To cover the council itself – as they are a large local employer, who can significantly contribute to upskilling and employing the local workforce.
- Reducing the development threshold from 50 to 10 units, as many of the Richmond developments will be smaller, infill sites.
- Not giving developers the opportunity to easily avoid these provisions, by claiming specialist skills are required by allowing this only in 'exceptional' circumstances. Disney did this when

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applying to operate on the STAG site, despite the fact that Richmond has a large, historic film production base in the borough and many colleges with relevant courses in the surrounding area.

This change is in line with national policy and supports whole plan delivery.

c. Relevant Policies and other evidence

National Planning Policy (NPPF) Framework 2021 – Plan making and delivery	<p>Strategic policies</p> <p>20. Strategic policies should .. make sufficient provision for, employment .. education ..</p> <p>22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</p> <p>26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.</p> <p>Preparing and reviewing plans</p> <p>31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p>33. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy.</p> <p>Development contributions</p> <p>34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.</p> <p>Examining Plans</p> <p>35. ...Plans are 'sound' if:</p> <ul style="list-style-type: none">a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs²¹; and is informed by agreements with other authoritiesb) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..
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	d) Consistent with national policy – enabling the delivery of sustainable development ..
London Policy S3, Part A	<p>S3 Part A – To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:</p> <ol style="list-style-type: none">1) prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. Needs should be assessed locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities;2) identify sites for future provision through the Development Plan process, particularly in areas with significant planned growth or need for school places (including Special Educational Needs and Disability places)3) 3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need

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4. Section 13. Place Based Strategy for Mortlake & East Sheen Pg 122-135

Section 13 is included in pages 122-135 of the Local Plan. I attach the detailed comments on this section which I sent to the Spatial Planning and Design Team Manager on 4 April 2023 in the tables below. None of the comments were included in the draft which was approved by full council on 25 April.

I received a reply on 18 April, in which she explained various Local Plan and Planning application processes and essentially stated that it was too late to give comments 'no substantial comments or redrafting at this point'. As shown by the mark-up, most of my comments were correcting inaccuracies that related to the ward Mortlake & Barnes Common. Given the planned development, around the locality, it was important that the plan accurately portrayed Mortlake & Barnes Common before development began and acknowledged that it is already the largest ward, by population in the Borough and the second highest in terms of densities.

I feel the officer's decision not to include any of the points I raised was not justified, as required by NPPF policy 35b. I would ask if the Inspector can consider whether these comments should have been included.

a. Local Plan proposed amendments - 1

'Local Plan Policy 17.7

17.7 The Urban Design Study 2021 has identified capacity for growth in the borough. The Council will encourage higher density development in more sustainable locations, such as main centres and areas better served by public transport, subject to compatibility with established character. Development should optimise site capacity through the design-led approach. This, along with local factors, such as proximity to facilities and to public transport routes, and the character of the surrounding area, will be taken into account in reaching the appropriate density for a particular site, see Policy 28 Local character and design quality, Policy 44 Design Process, and Policy 45 Tall and Mid-Rise Building Zones.'

b. Reasons for the proposed amendments - 1

The Urban Design study 2023 (updated from 2021) made these recommendations, however this is not true of the area surrounding Chalker's Corner, which has a low PTAL rating of between 1-2. The area around Chalker's Corner is not a 'sustainable' location and therefore, in line with NPPF policy 20(b). Strategic Policies should 'set out an overall strategy .. and make sufficient provision for .. b) infrastructure for transport, telecommunications, security, waste management, water supply, ... c) community facilities (such as health, education..) etc.

As stated above, no additional transport infrastructure has been planned (see below) to accommodate the cumulative impact of site allocations Homebase (29), Kew (31), STAG (35), and Barnes Hospital (38) amounting to at least 2,800 new homes and 6,000+ new people in the area together with a 1,200-pupil secondary school, a 90 pupil SEND school and Hospital.

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a. Local Plan proposed amendments– 2

I proposed Chertsey Court as a site allocation within the plan. In her e-mail on 18 April, the Spatial Planning and Design Team Manager replied:

‘Regarding the suggestion that Chertsey Court be included in the existing STAG Brewery Allocation, ... it is worth noting that no representation was made by RHP to include Chertsey Court in [March-April 2020 or] any plan making stages... Given the site is adjacent, rather than complimentary to the STAG Brewery site, and noting the different ownerships as well as the absence of any recent or future development aspirations from RHP, it would not be logical to extend the current Site Allocation to include the adjacent Chertsey Court estate’.

I tried on many occasions to meet with the Officer to discuss the e-mail. I was concerned that my proposals had been misunderstood and that the Officer was not aware of previous discussions that had taken place between members, RHP and the developers, about Chertsey Court. Unfortunately, Officers refused to meet during the consultation period.

b. Reasons for the proposed amendments - 2

The reluctance to consider alternative plan sites is in breach of NPPF policy 32. This site allocation could have helped to achieve other planned strategic objectives in the London and Local plan, including delivering affordable housing, and optimal transport infrastructure changes, and unfortunately these opportunities have now been missed. I would ask if the inspector can consider whether this site should be included.

Chertsey Court should be included as a site allocation because the rejection of this site was not justified as required by NPPF policy 35b. Alternate proposals, which could enable the delivery of more sustainable development, were not considered properly.

c. Relevant Policies and other evidence

National Planning Policy (NPPF) Framework 2021 – Plan making and delivery	Preparing and reviewing plans 31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. 32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal .. wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Examining Plans 35. ...Plans are ‘sound’ if: a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs ²¹ ; and is informed by agreements with other authorities b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters.. d) Consistent with national policy – enabling the delivery of sustainable development ..
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Local Plan Policy Introduction	2.23 We cannot act in isolation and therefore work hand in hand with communities and local partners
Place based strategy	Detailed comments on the place based strategy for Mortlake & East Sheen section of the plan – sent on 4-4-23 – attached as a PDF

13 Place-based Strategy for Mortlake & East Sheen

Place-based Strategy for Mortlake & East Sheen

Area Profile

The Mortlake & East Sheen area encompasses East Sheen Town Centre, with East Sheen Residential and East Sheen Parkside, along with Mortlake Residential and Mortlake Riverside. These are character areas H1, H2, H3, H4 and H5 and in the Urban Design Study 2021.

This area is predominantly residential, between the River Thames and Richmond Park. Towards Richmond Park there are attractive tree lined streets with large houses, whereas north of Upper Richmond Road West the character is formed by terraced cottages and houses.

Across this area Sheen Common and Palewell Common provide unique open areas for a range of recreational activities and important wildlife habitats.

Although Mortlake has significant river frontage with the Varsity Boat Race traditionally ending near Chiswick bridge, there is currently little open green space. It is one of the most densely populated areas in the borough. The largest green spaces include the OOLTI designated field, currently part of the STAG Brewery site, running along the boundary with the Lower Richmond Road; Mortlake Green, adjacent to Mortlake Station; and Jubilee Gardens opposite Avondale and Ashleigh Road. along with Mortlake Common and the open space along the River between Chiswick Bridge and Barnes— with the Varsity Boat Race traditionally ending at Mortlake.

The Mortlake Brewery is a prominent part of the area's heritage. It is a significant development opportunity in the borough, since brewing operations ceased at the end of 2015. There are historic assets - the former bottling building, the Maltings building and the former hotel building, along with historic brick boundary structures that survive.

The centre of East Sheen is bisected by Upper Richmond Road West (A205 South Circular) and inevitably this has a major impact on its appearance and character. Identified as a district centre in the borough's centre hierarchy and the London Plan (see section 6 of the Plan), there is a mix of multiple and specialist shops, pubs, restaurants, cafes and a range of community facilities at the Sheen Lane Centre. The London Plan recognises existing office functions, generally within smaller units, should be protected, albeit that it has medium commercial growth potential.

Mortlake now has limited shops and services on Mortlake High Street which requires upgrading and improvement, by the addition of more shops, cafes, restaurants, and community facilities having been neglected over the past few decades, in anticipation of the regeneration on the STAG Brewery site. There is currently is a neighbourhood centre at White Hart Lane.

The area as a whole is very congested, being squeezed between the river and the Richmond park. Vehicular traffic has been made worse by the closure of Hammersmith Bridge and Sheen Gate, Richmond Park. Chalker's Corner is currently the epicentre of a proposed further 3,000 new homes, from four developments, at Homebase, Kew Retail Park, STAG Brewery and Barnes Hospital. The STAG site has a PTAL rating of 1 at the Western corner. relatively well-connected, including Train services through Mortlake Station, have been reduced as have bus services running through Mortlake. although the railway lines and level crossings also form significant barriers to movement given the length of time they are down during the day. In line with the National, London, and Local

Plan this requires development proposals to reduce the negative impact of development on the transport network and reduce potentially harmful public health impacts. To mitigate against the traffic and public transport issues in the area, will require a significant remodelling of the road, rail, active travel infrastructure to accommodate the increase in people and transport proposed in an already densely populated, heavily congested area.

As part of the Urban Design Study consultation in 2021 on what local people valued in their area, Mortlake Residential (H2) received moderately high scores for attractiveness, green spaces, shops and restaurants and community spirit. This reflected the lack of investment in this area over the past few decades in anticipation of the long-awaited STAG Brewery redevelopment. The highest scores received for East Sheen Town Centre (H3) were for its shops and restaurants, green spaces, vibrancy and community spirit. East Sheen Residential (H4) received consistently high scores across most features. East Sheen Common and Residential (H5) received particularly high scores for its attractiveness and tranquillity, given it is adjacent to Richmond Park. and shops and restaurants.

Overall strategy

Overall, the Urban Design Study 2021 sets out that Mortlake Riverside (H1) has a distinctive sense of place and heritage, with an overall high sensitivity to change, but its character risks being undermined by inconsistent building typologies, the dominating presence of the main road i.e., Lower Richmond Road and Mortlake High Street, and its increasing disconnect from the Thames. For this area, the strategy aims to conserve and enhance the area's existing valued features and heritage assets, and to restore Mortlake's historical prominence and relationship with the Thames. Mortlake Residential (H2) has an overall high sensitivity to change, with the existing distinctive character and the coherent townscape, and the strategy is to conserve and enhance the character by developing its community spirit by encouraging more shops, cafes and restaurants along Mortlake High Street and investing in Jubilee Gardens and public play spaces behind Mortlake High Street and adjacent to Mortlake Green. East Sheen Town Centre (H3) is considered to have a fair sense of place and heritage with a high sensitivity to change overall, although the western part of the town centre has relatively lower sensitivity. It is recognised that the quality and functioning of the area as a town centre has been negatively impacted by several unsympathetic developments, the dominance of vehicle traffic along the South Circular, and the loss of coherence in shop frontages. The strategy is therefore to restore the historic character and improve its public realm and sense of identity, particularly along Upper Richmond Road to make it a more attractive destination. East Sheen Residential (H4) has a strong existing character and the townscape is well-maintained with a good quality of architecture, with a high sensitivity to change. The strategy is to conserve the character, elements, and features, whilst enhancing appropriate areas. East Sheen Parkside (H5) has a strong existing character and a high sensitivity to change. The strategy is to conserve the character, whilst enhancing particular features in order to strengthen the area's future resilience. The Urban Design Study contains design guidance for each character area and for Richmond borough's Riverside.

Other initiatives

The Council works with the East Sheen Business and Retail Association (ESBRA) who work closely with the community dealing with local issues such as parking and funding new and exciting projects, breathing life into Sheen living for all.

Local shop owners along White Hart Lane work with the Barnes Community planning team, to develop ways of enhancing the area. This work should be extended along Mortlake High Street and Lower Richmond Road including the shops between Hanson Close and Kingsway.

Transport for London's Cycling Action Plan has highlighted opportunities for additional cycle corridors and identified a top potential route through Sheen and Mortlake into the neighbouring borough of Wandsworth and to safely connect Mortlake with Richmond, Kew, Barnes, Putney and Chiswick by investing in towpath improvements-

Vision

The vision for Mortlake is to create a new focus to the village by redevelopment of the Stag Brewery site, creating a recreational and living quarter and a green link between Mortlake Station the village and the riverside and to also enhance the environment around the existing 3,000 homes, by investing in more badly needed transport, social and community infrastructure-

The vision for East Sheen is to retain the established character of the area, to maintain and enhance the district centre, providing shops, services, and employment for the local communities. There is also the potential to make Milestone Green the centre of East Sheen.

Policy

Future development in this place is expected to:

- Contribute to a sense of activity and vibrancy in the town and neighbourhood centres, retaining the mix of uses including restaurants, cafes and pubs along Sheen Lane and along at the junction of Mortlake High Street, Lower Richmond Road and White Hart Lane, to maintain a sense of activity and vibrancy, and encourage independent shops and businesses, emphasising local makers and artisans. Encourage reinstatement of shop fronts' original design to achieve consistency in appearance in East Sheen Town Centre.
- Enhance the sense of arrival and quality of the public realm at Mortlake Station, through opportunities for art and wayfinding and improvement of the facilities at the station, Mortlake Green and adjacent playground.
- Incorporate focal points and establish distinctive landmarks, without recourse to tall buildings, including in East Sheen Town Centre to enhance the sense of place and the area's identity as a destination such as the space around the war memorial.
- Contribute to creating a 'centre' for East Sheen at Milestone Green.
- Enhance the public realm and create public areas for dwelling and "spill-out", rather than just narrow, transient spaces, using high quality street furniture, and increase greening through tree planting and verges in Mortlake High street, Lower Richmond Road and White Hart Lane. -
- Create sense of pride in the Mortlake area by coming up with a name for the Barnes Children's centre that celebrates the fact that this is in Mortlake, not Barnes.
- Ensure new development along the river contributes to its valued leisure functions as well as positively addressing Mortlake High Street and Lower Richmond Road. Enhance local distinctiveness around Mortlake Riverside using its relationship with the river and historic industry.
- Enhance continuity, connectedness and legibility of the Thames Path route, to improve connectivity with the wider area, if feasible by a green link bridge connecting the north and south towpaths.
- At East Sheen Parkside, enhance the quality and biodiversity of East Sheen Common and ensure green infrastructure is physically connected, notably along Fife Road, The Mall, and Spencer Gardens, and improve boundary treatments and interface with Christ's School.
- Consider opportunities to reduce the perceived dominance of vehicles, promoting active travel with space to create café seating areas and improve pedestrian, cyclist and scooter-experience

in East Sheen Town Centre and throughout at Mortlake Riverside and in particular at the busy junctions around Chalker's Corner and along the heavily congested Lower and Upper Richmond Roads, A316 and A205.

There are site opportunities for new development in this area. Within the town centre boundary, there is some potential where the townscape is less intact for development to restore the historic character. The Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen (Site Allocation 36) is an opportunity - if the telephone exchange is declared surplus to requirements - for a mixed-use scheme that contributes to the vitality and viability of the centre. Towards Mortlake High Street, there is a similar opportunity - if the Mortlake and Barnes Delivery Office, Mortlake (Site Allocation 35) becomes surplus - for employment or other commercial and retail uses.

At Stag Brewery (Site Allocation 34) there is a significant opportunity to create a new quarter for living, with recreational and commercial uses to generate vibrancy, local employment, community and leisure opportunities. The redevelopment will create vibrant links between the River and the town, enlivening the Riverside frontage and Mortlake High Street, to transform Mortlake while respecting the character and history of the area. There is an opportunity to accommodate tall buildings within the sensitivities of the surrounding context, in accordance with Policy 45 Tall and Mid-Rise Building Zones.

In addition, the current proposed repair of Hammersmith Bridge will result in a new permanent bridge available for re-siting elsewhere on the Thames once the repairs are completed. This 'green bridge' could provide a pedestrian, scooter, cyclist link between Dan Mason Drive on the North side of the Thames and Ship Lane on the South, steering non-vehicular traffic away from the polluted, busy A316 and onto the quieter, safer roads with the added benefit of linking the North and South towpaths, providing a green link onto and across the river from the Lower Richmond Road.

There could also be an opportunity to include the Chertsey Court site, currently a large block of 170 flats in Lower Richmond Road as part of the Mortlake regeneration project (Site Allocation 34a). These flats are in poor condition needing inter alia new lifts, and that there could be potential for the residents in these flats to be accommodated either temporarily or permanently in the Brewery redevelopment while Chertsey Court is either renovated with energy-efficient infrastructure or else rebuilt elsewhere on the Brewery site, opening up the Chertsey Court site for alternate use.

The benefits include the potential for a reconfiguration to allow space for a better junction between the A316, A205 at Chalker's Corner, perhaps incorporating a roundabout. This could also include improved conditions for buses, cyclists and pedestrians and help improve the current very low PTAL rating of 1.

In addition, the Chertsey Court site, could provide an improved location for a school, if required, as this is adjacent to the A316, and could be accessed directly from the A316, without increasing traffic on the, already very congested, Lower Richmond Road.

At Barnes Hospital (Site Allocation 37) redevelopment is expected to provide a new SEN school and health centre, along with residential.

See details in the Site Allocations within this area:

- Stag Brewery, Lower Richmond Road, Mortlake
- Chertsey Court, Lower Richmond Road, Mortlake

- Mortlake and Barnes Delivery Office, Mortlake
- Telephone Exchange and 172-176 Upper Richmond Road West,
- East Sheen Barnes Hospital, East Sheen

Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake

Site Proposal

The Council will support the comprehensive redevelopment of this site, with a forward-thinking visionary feel embracing 'green infrastructure' and initiatives wherever possible, such as G8 food growing and LP17 green walls and roofs. An appropriate mix of uses, particularly at ground floor levels, should deliver a new heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, if capacity is required plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including 3+ bed -affordable housing for social rent), employment, commercial such as retail and other employment generating uses, additional health facilities including GP services which are currently at capacity, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing fields, without the loss of overall green space. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside, and if feasible a green link bridge between the north and south Thames towpath.

Context

- The Council has produced and adopted the Stag Brewery Planning Brief SPD in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. Any proposed development should have due regard to the adopted brief.
- The brewery operations on this site ceased at the end of 2015; the site has been marketed and sold and is currently being leased as a film studio, further establishing the creative industries in Richmond.
- There is a need to create a new heart for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new 6-form of 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.
- Whilst this site is not located within a town centre, it falls within the Mortlake Area of Mixed Use. Therefore, it is expected that this site will provide a substantial mix of employment uses, including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.
- Retail and other commercial uses, such as cafés and restaurants, will add to the vibrancy of the new centre as well as contributing to the provision of important local employment opportunities.
- Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages should contribute to creating an inviting and vibrant new centre.
- The provision of residential uses (including policy compliant affordable housing) will ensure that the new heart of Mortlake becomes a vibrant centre for new communities.
- The site is within an Archaeological Priority Area and 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 site is very close to an Air Quality Focus Area. In addition to the development having to achieve “Air Quality Positive”, strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as pupils at the secondary school and residents in the new flats, particularly those adjacent to the very congested Lower Richmond Road, A316 and Mortlake High street.
- Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community.
- The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of re-provision and upgrading, where a comprehensive approach to redevelopment can be taken in line with Policy 36, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness and retains use for sport and recreation activities, rather than strips of green between buildings, resulting in the loss of 62% of the OOLTI green space- In addition, re-provision and upgrading of the playing fields within the site for sport uses has to be carried out in line with Policy 37, the NPPF and Sport England Policy.
- The adopted development brief (2011) identifies a number of transportation and highway issues. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport (rail and buses), -active travel (bike, scooter etc) and pedestrian safety facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment, but not if it results in the removal of additional green space in the development.
- There is potential opportunity in the tall building zone (7 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones, although the Urban Design Study 2021 recognises the limits due to the sensitivities of the surrounding context.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Urban Design Study 2021 in the character area profile and design guidance for H1 Mortlake Riverside and the Mortlake Village Planning Guidance SPD

Ownership:(public/private/mixed/unknown)

Private

Expected Implementation Timescale

Short- term (0-5 years) **Medium (5-10 years)** Long (10-15 years)

Site Allocation 34a: Chertsey Court, Lower Richmond Road, Mortlake

Site Proposal

Chertsey Court, is a large block of 170 flats in Lower Richmond Road, adjacent to Chalker's Corner and the A316. These flats are in poor condition needing inter alia new lifts, and that there could be potential for the residents in these flats to be accommodated either temporarily or permanently in the Brewery redevelopment while Chertsey Court is either renovated with energy-efficient infrastructure or else rebuilt elsewhere on the Brewery site, opening the Chertsey Court site for alternate use, for example as a school site, if required.

Context

This area as a whole is already very congested, being squeezed between the river and the Richmond Park. Vehicular traffic has been made worse by the closure of Hammersmith Bridge and Sheen Gate, Richmond Park. Chalker's Corner has a PTAL rating of 0-1 and is currently the epicentre of a proposed further 3,000 new homes, from four developments, at Homebase, Kew Retail Park, STAG Brewery and Barnes Hospital.

Train services through Mortlake Station, have been reduced as have bus services running through Mortlake. The railway lines and level crossings also form significant barriers to movement given the length of time they are down during the day. The traffic and public transport issues in the area, require a significant remodelling of the road, rail, active travel infrastructure to accommodate the increase in people and transport proposed in an already densely populated, heavily congested area.

One solution is to include the regeneration of Chertsey Court into the development proposals. Using a similar model to the recent precedent at the Ham Close regeneration project, this would also have the added benefit of ensuring residents on this estate were not 'left behind' when the adjacent area is upgraded.

If RHP became the Affordable Homes partner, this would make the regeneration of Chertsey Court easier, as the number of new affordable homes proposed on the STAG site available for decant would be broadly equivalent to the number of homes currently on the Chertsey Court site. Redevelopment would include either:

- Option 1- Current tenants/leaseholders moving to the new development (possibly with a right of return) and once empty, the retrofit/refurbishment (possibly with a further level/block) of the building to ensure compliance with current building standards, including health and safety, fire legislation etc; or
- Option 2 - Current tenants/leaseholders moving to the new development, the existing development demolished and either:
 - rebuilt to current building standards, including health and safety, fire legislation etc.;
or
 - used as a school site, if capacity is required, freeing up the STAG site for additional residential homes. The Chertsey Court site would provide an improved location for a school, if required, as this would be adjacent to the A316, and could be accessed directly from the A316, without increasing traffic on the, already very congested, Lower Richmond Road.

Currently the age of the building and level of disrepair would appear to have made it difficult to maintain the decent homes standard whilst the flats are occupied. Under both option 1 or 2 additional affordable homes could be added either to the Chertsey Court site or the STAG brewery site.

Ownership:(public/private/mixed/unknown)

RHP - Housing Association, this scheme will currently only be possible if RHP is chosen as the affordable home's provider on the STAG Brewery site. At the moment, this is out to tender.

Expected Implementation Timescale

Short- term (0-5 years) Medium (5-10 years) Long (10-15 years)