

# **London Borough of Richmond upon Thames Pre-Publication Local Plan 2016**

## **Comments from the Mortlake with East Sheen Society**

### **1. Introduction**

There is mention here of the existing plans including the Core Strategy, Development Management Plan, Unitary Development Plan, etc, but surprisingly no mention of the recent Village Plans. We note that the Village Plans get mentioned in the next chapter but we wondered why not in the introductory chapter?

### **2. Strategic Context, Vision and Objectives**

We note the Council's strong opposition to the expansion of Heathrow. Our Society is largely in support of the Council on this but the support is by no means unanimous. Certain members of our Society believe that construction of a third runway will spread the load and thereby, as indicated in the Davies Commission Report, enable a ban to be imposed on all scheduled night flights between 11.30pm and 6.00am. The Council needs to explain – for the benefit of the doubting Thomases in our Society – why it considers this ban is not do-able.

We are pleased to see a reference in this chapter to a new village heart in Mortlake. We are also pleased to see references to affordable housing and also affordable small/medium spaces for employment use.

### **3. Spatial Strategy**

We note the reference to East Sheen providing office space for businesses and we are pleased to see the reference to the Council creating a 'centre' for the village at Milestone Green and improving the convenience of shopping for the community including through a range of uses. We are also pleased to note the reference to higher densities being achieved in East Sheen without recourse to tall or taller buildings within its centre.

### **4. Local Character and Design**

#### ***New Policy LP 2: Building Heights***

We note the reference to tall or taller buildings being possibly appropriate at inter alia the Stag Brewery site in Mortlake subject to the criteria set out. However, there is no mention of tall or taller buildings in the summary brief for the Brewery site in Chapter 12 below.

#### ***New Policy LP 11: Subterranean Developments and Basements***

We are pleased to see that such developments are not within 'permitted development rights' but are considered to require planning permission. We note the new policy and are pleased to see the proviso in para 4.11.5 that "the proposal is appropriate for the character of the area and the site allows for appropriate access for plant and machinery to enable construction without adverse impacts". We also note in para 4.11.14 that applicants are strongly advised to discuss their proposal with neighbours and other parties prior to submission of a planning application. In this regard, however, we would like to see the following wording added: "Evidence of engagement with neighbouring occupiers and evidence of no objection from them must be included as supporting information with the planning application".

### **5. Green Infrastructure**

#### ***New Policy LP 14: Other Open Land of Townscape Importance***

Para 5.3.1 indicates these areas as being shown on the Proposals Map. This was not attached to the Pre-Publication Local Plan but we managed to find it on the Council's website and noticed that it was last updated in 2015. We agree with the areas identified but have a comment about the Stag Brewery sportsground – see Chapter 12 below.

## **6. Climate Change and Sustainable Design**

There is much duplication here of policies in other chapters, e.g. there is a section on basements and subterranean developments which has already appeared in Chapter 4.

## **7. Town Centres**

Our comments on the East Sheen shopping centre are the same as for Chapter 3 above. However, there is one additional item not mentioned in Chapter 3, vis. “improve Mortlake Station.” See our comment on this site in Chapter 12 below.

## **8. Community Facilities**

### ***New Policy LP 29: Education and Training***

Our Society is not wholly convinced by the need for additional school places in the area. The East Sheen and Sheen Mount Primary Schools have recently been expanded and a new Thomson school has emerged in Vernon Road. Some children from these primary schools go on to attend independent secondary schools.

It would be useful if the map showing the location of schools, shown inappropriately in the Health and Wellbeing section, could be transferred to the Education and Training section and could distinguish between the state schools and independent schools.

We note in para 8.2.11 that the Stag Brewery site in Mortlake has been identified for a new 6-form of entry secondary school and the Barnes Hospital site for a new 2-form of entry primary school. Our Society is not enamoured of either proposal. Secondary school children need good public transport access (PTA) and the PTA level for the Brewery site is a mere 2 points, which is poor. Primary school children are often chauffeured by parents in cars (alas regrettable but in the current security climate somewhat inevitable) and the car access to the Barnes Hospital site in South Worple Road is very poor. See our comments on these sites in Chapter 12 below.

## **9. Housing**

### ***New Policy LP 34: New Housing***

We note the number of units expected to be provided in East Sheen (including Mortlake and Barnes Common) during 2015-2025 is around 400-500. We assume this includes the number of units expected to be provided on the Stag Brewery site in Mortlake?

### ***New Policy LP 36: Affordable Housing***

We are pleased to see a reference to 50% affordable units on sites capable of 10 or more units and a reference to a financial contribution being made to the Affordable Housing Fund on a sliding scale in respect of development of less than 10 units.

### ***New Policy LP 39: Infill, Backland and Backgarden Development***

Our Society is concerned about large summerhouse creep in back gardens and is pleased to see this policy.

## **10. Employment and Local Economy**

### ***New Policy LP 41: Offices***

We note and agree the office locations identified in our area.

### ***New Policy LP 42: Industrial Land and Business Parks***

We note that the list of industrial sites identified in para 10.3.6 does not include any sites in Mortlake and East Sheen. We are concerned about the loss or absence of any service industry that needs to be in our area but is unable to afford the rents.

## **11. Transport**

### ***New Policy LP 45: Parking Standards and Servicing***

It would be useful if this section could be accompanied by a map indicating the different PTA levels throughout the Borough.

## **12. Site Allocations**

### ***SA 23 Stag Brewery, Lower Richmond Road, Mortlake***

The 3<sup>rd</sup> bullet indicates 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... Our Society would like to see more evidence of this need and is much concerned that the Council's decision to change the school allocation on this site from a small primary school to a much larger secondary school was taken without any form of public consultation. Our concern about the poor PTA level has already been stated in our comments on Chapter 8 above.

We are, in addition, concerned that the development of such a school on this site could result in the loss of part of the Brewery sportsground which is shown on the Proposals Map as 'Other Open Land of Townscape Importance'. We have wondered if the Council has properly identified the most appropriate site for this secondary school (if it is required). Secondary school catchment areas go beyond borough boundaries and we have wondered whether the Council has considered for example Barn Elms where during the summer there are two running tracks, viz. an all-weather track in the Richmond part and a grass track in the Wandsworth part, and whether it might be possible to merge these two facilities onto the Richmond track thereby releasing the Wandsworth track for development of a secondary school.

We realise this suggestion is in conflict of New Policy LP13 which states that 'inappropriate development will be refused unless very special circumstances can be demonstrated that clearly outweigh the harm to Metropolitan Open Land.' We feel that, on the assumption that there is a need for an additional secondary school, the circumstances here are indeed 'very special.' We are aware that the whole of Barn Elms is in the ownership of one borough, namely Richmond.

The 7<sup>th</sup> bullet makes reference to "the provision of residential uses (including affordable housing)". We don't like to see affordable housing in brackets as it suggests it might not happen.

The 11<sup>th</sup> bullet indicates the Council has produced and adopted a development brief for the site. It should be noted that the brief, which was adopted in 2011, needs to be re-adopted for two reasons: first, the Council is now proposing to include a secondary school instead of a primary school and, secondly, the whole site is now within a Conservation Area whereas previously most of it was not. It should also be noted that the development brief gave no indication of the number of housing units to be expected. The most critical issue is the impact of traffic generated by the site and the capacity of the Lower Richmond Road to accommodate it – and this has not been addressed.

We note there are no bullets covering (a) the heights of buildings despite the reference to this in Chapter 4 above and (b) the density of development and its traffic impact on Lower Mortlake Road given that the Chalker's Corner junction and Sheen Lane level crossing present serious constraints to any increase in traffic capacity.

***SA 24 Mortlake and Barnes Delivery Office***

On the understanding that this site is being declared surplus to requirements by Royal Mail we agree that this site should be redeveloped for employment generating uses. In addition to offices there should be scope for any service industry including affordable units, which needs to be in the area and is currently missing.

***SA 26 Telephone Exchange and 172-176 Upper Richmond Road West***

No change from previous plans and hence no comment.

***SA 27 Barnes Hospital***

We are much concerned about the part development of this site alongside the remnant hospital for a primary school for reasons already stated in our comments on Chapter 8 above. Our preference for this site alongside the remnant hospital is for a housing development, including social housing, for which a scheme already exists.

We would like to see added:

***SA 28 Mortlake Station***

This site was in previous plans but for some reason has been omitted. Chapter 7 above mentions "improve Mortlake Station." The land on both sides of the station is used for the sale of timber. On the north side of the station the timber yard, which has no room to expand outwards, is instead expanding upwards and, whilst we have no objection to the timber yard per se – it provides an invaluable service – we are much concerned about its visual appearance and also about the generation of lorry traffic next to a crowded level crossing. There are issues here that need to be addressed.