

Mr Max Millington comments

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Housing targets

The Borough of Richmond's housing target hitherto has I understand been 311 housing units per annum. An increase to 811 units per annum is unrealistic and can not be achieved without disproportionate detriment to our environment, infrastructure and heritage. This area is predominantly rural and sub-urban in setting, such an increase will risk destroying the Borough's rural assets such as open spaces which the Mayor otherwise states he wishes to see protected.

Density linked to radius from public transport / Stag Brewery SW14

In Mortlake and East Sheen we have close to 900 housing units proposed on the Stag Brewery site but the accessibility of this site is extremely poor - to the extent the 900 units proposed is grossly excessive. An ambitious SPD for the site exists, and that was founded on a maximum of 560 units on the site - and that was before the Council sought to impose a 1,200 pupil secondary school on the community on the same site! The site and environs will simply not function with this scale of development. If housing truly is the immediate priority on this site, the school must be made smaller and the playing fields be protected.

The Brewery site, whilst within 800m of Mortlake Station and East Sheen town centre, nevertheless has a PTAL 2 rating (varying between 1 and 3) and can only be accessed from Lower Richmond Road/Mortlake High Street which are already grid-locked for most of the day due to constraints at Chalkers Corner to the west, the Sheen Lane level crossing by Mortlake Station to the south and the River Thames to the north. The public transport improvements proposed for this project are almost non-existent.

Thus, the 800m criterion is arbitrary: in the same way that maps at stations showing a 5 minute walk in each direction can provide a useful indication of travel time, when there are material obstacles that will impede that walk - such as a major road, an inaccessible site, physical impediments, or a river - the value declines materially. Accordingly, an arbitrary 800m rule will not deliver a sensible outcome. I would recommend it be dropped, or in the alternative that it be heavily caveated to take due account of the particular circumstances the site in question, which must prevail. Due account should also be taken of the capacity of public transport to expand with increase in population: where that is minimal, such as at Mortlake station where trainlines are operating at capacity, the housing capacity in the years to come will necessarily be lower.

The Borough of Richmond's target of 634 housing units on small sites (below 0.25 ha) is unrealistic and can not be achieved without detriment to our environment, infrastructure and heritage.

In Mortlake and East Sheen there are, I understand, very few small sites within 800m of Mortlake Station or the East Sheen town centre. Estimate is in the region of 10 new units per annum.

Affordable housing

Until now development of major sites in the Borough of Richmond has included about 20-25% affordable. 50% is unrealistic in practice as it will deter developers from coming forward with development proposals and hence housing targets will never be achieved. A 35% target with 30% being achieved seems sensible and achievable. It is imperative that numbers are universally reported and viability reports are made publically available.

There does not appear to be any policy regarding vacant housing units. There are some 15,000 recently built housing units lying vacant.

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Affordable housing must be sensitively incorporated into and across development sites to best achieve social integration and promote social mobility: blocks of ghetto-style housing provided only for social housing absolutely must be resisted, even to the extent it delivers a small incremental addition to social housing stock. The long term consequences for the individuals and the costs to the Borough far outweigh any such attraction.

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The Borough of Richmond is fully aware of the need for more school places and has opened a new centrally located secondary school in the past year. In Mortlake and East Sheen it has expanded three primary schools from 2FE to 3FE and supported development of a new primary school, albeit poorly located alongside a level crossing in Sheen Lane. And it has negotiated - against the will of the significant majority of residents - inclusion of a new 6FE secondary school, plus sixth form, on the Brewery site in order to accommodate the extra pupils emerging in the primary schools (and to make up for its failure to make adequate provision in recent years).

However, the location of this large secondary school is entirely inappropriate and does not conform with your criteria of good public transport accessibility and access by walking and cycling. For instance, we envisage large numbers of secondary school pupils cycling across the level crossing in Sheen Lane where the barriers are down for upto 50 minutes during the peak hour including for periods of up to 14 minutes.

The Council reached this decision without taking due account of the factors you identify. If they had done, they would realise that a better location for this secondary school is at Barn Elms which enjoys good public transport access and meets your criteria of suitable, accessible outdoor space and next to parks and green spaces. The principal issue with the Barn Elms site, as I see it, is that it lies in the Tory heartlands and the Council is unwilling to upset its voters. In contrast, Mortlake is one of five identified areas of deprivation in the Borough. This decision must be re-visited: it is not in the interests of the community and was adopted, with a very light evidence base, in just 17 minutes.

I am concerned that, if the SHLAA study's target of 811 new housing units per annum for the Borough of Richmond is unachievable, then this (or any) proposed new 6FE secondary school will never be filled and will become unviable. In these circumstances it would be more sensible to expand the two existing state secondary schools, both of which currently have places to spare.

It should also be noted that the Council's proposal to include a 6FE secondary school means the proposed 2FE primary school included in the proposal for the site in 2011 and contained in a supplemental planning document, can no longer be built on the site. Even though there is a clear need, with local children around the site outside of all local catchment areas - as I can attest having been through the process this year - and with the proposed housing demographic of the site indicating greater take-up for primary school (or indeed pre-school) pupils than secondary school.

The policy should also provide for a full health impact assessment of situating schools in known or potential emissions (or other peril) hotspots. In the case mentioned above, the Stag Brewery borders an air quality management area, with levels frequently exceeding EU maximum levels. Of all the places in the Borough where this is not an issue, it simply cannot be the case that the only place appropriate to put a school is in the middle of one of the most polluted areas.

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This is a laudable aim. However, close scrutiny needs to be applied to the developers' proposals and mitigation delivery.

We have an AQFA in Mortlake, vis. Chalkers Corner at the intersection of the A316 with the South Circular. The Lower Richmond Road also feeds into this intersection and the developer's proposals for the Brewery site include a realignment and widening of this junction to allow an increase in capacity for cars. Such a realignment and widening will entail the loss of garden land and trees in front of Chertsey Court and will bring air pollution from vehicles closer to these flats.

There is also a proposal to introduce a large secondary school on to the Stag Brewery site, as well as housing at levels double those proposed in the adopted planning brief for the site. It cannot be right to take such an area, with known levels exceeding legal limits, and add large-scale residential and educational use which can and in practice will only aggravate the situation.

I am pleased therefore to see your policy that development proposals should not lead to further deterioration of existing poor air quality.