



Mayor of London

By email to mayor@london.gov.uk

5 February 2020

Dear Mayor,

Applications to London Borough of Richmond-upon-Thames

18/0547/FUL, 18/0548/FUL and 18/0549/FUL

Mortlake & Barnes Common The Stag Brewery, Lower Richmond Road, Mortlake and; Chalkers Corner, Junction of Lower Richmond Road South Circular and Clifford Avenue Stag Brewery, Mortlake: proposed development

We are writing to ask that you require substantial changes to this proposed development on the basis that current proposed parking provision (0.75 per unit or 703 additional cars) is not compliant with the Draft London Plan and will undermine the Mayor's Transport Strategy. Private car parking should be removed entirely and replaced with car club parking only, accompanied by improvements to public transport walking and cycling infrastructure.

It should be made clear to the developer that:

- 1. Parking provision for this development is not compliant with the Draft London Plan and in any event should be developed with reference to the wider policy and planning context (not just maximum parking standards), specifically:**
 - a.** Draft London Plan parking provision policies (not just the maximum provision standard) make clear that adding in 703 private car parking spaces is unjustifiable.
 - b.** The Stag Brewery is located between the river and railway line which already means traffic is at a standstill: adding in more cars will worsen traffic and bus times.
 - c.** The proposed development would undermine Mayor's Transport Strategy targets.
 - d.** The proposals are inconsistent with the climate emergency declared by Richmond Council.
- 2. The developer's concerns about risk to profit if private parking were to be removed are unjustified given the prime location and potential for alternative car club / public transport provision**
- 3. The application should be amended to remove all private car parking, introduce car club provision instead, and work with the borough to plan improvements to public transport, walking and cycling infrastructure.**

In more detail

Parking provision for this development is not compliant with the Draft London Plan and in any event should be developed with reference to the wider policy and planning context (not just maximum parking standards)



Draft London Plan parking provision policies (not just the maximum provision standard) make clear that adding in 703 private car parking spaces is unjustifiable in planning policy terms. Though Richmond states the proposals are planning policy compliant because “Proposed parking provision falls just below the maximum”, the proposals are not compliant with the Draft London Plan ([here](#)) for the following reasons.

- The Draft London Plan states “*Car-free development should be the starting point for all development proposals in places that are **(or are planned to be)** well-connected by public transport...*” The developer has clearly not used car-free as a starting point; nor put forward proposals to make the area better connected by public transport (but instead has based its proposals on a private car use model).
- The Draft London Plan states “... *developments elsewhere [should be] designed to provide the minimum necessary parking ('car-lite')*.” Given the location and existing problems with congestion in the area, the developer should have looked to provide the minimum, but has not.
- The Draft London Plan states “*car club spaces may be considered appropriate in lieu of private parking.*” See [T6.1](#). In the case of the Stag Brewery, car club parking is appropriate and should have been made central to the proposal (in lieu of private parking) but the developer has instead proposed car clubs as an add-on to be located on public land outside the development.

Site location The proposed development sits between the River Thames and the railway line where level crossings are down 45 minutes in every hour. Planning for a future based primarily on private car-use in this location will consign residents new and old to a future in a car-dominated environment with even more congestion, pollution, noise and road danger.

Mayor’s Transport Strategy targets Also, the Mayor’s Transport Strategy (MTS) sets a target for the proportion of trips made by car to decrease from the current rate of 41% (in Richmond) to 25%. Like all boroughs, Richmond is also far away from meeting the MTS active travel targets – but adding in 703 more cars, with concomitant pollution, congestion, noise and road danger, will only further discourage active travel and hamper bus provision.

Climate emergency Added to this on 11 July 2019 Richmond Council declared a climate emergency. This is inconsistent with permitting a development introducing 703 cars anywhere in Richmond.

Concerns about profit are unjustified given the prime location and potential for alternative car club / public transport provision

The developers are concerned that the properties will not sell for as much if they do not have access to private car parking, however the properties can be marketed on the basis that:

- there will be plenty of car club provision
- public transport, walking and cycling infrastructure will be substantially improved, including to create better connections with the nearby Putney, Richmond and Hammersmith centres which all have very high PTALs
- new residents will enjoy a safe, car-free, pleasant environment.



In the 'car-free' scenario, the substantial cost of creating basement parking provision for 703 cars will also be saved.

Additionally, the site is a prime riverside location with property sale values likely to be higher than even in the immediate vicinity.

The application should be amended to remove all private car parking, introduce car club provision instead, and work with the borough to plan improvements to public transport, walking and cycling infrastructure.

The applicant should

- reduce car parking provision to zero per unit, removing the opportunity for private car ownership, and instead plan the development around the use of public transport, walking, cycling and car clubs
- fully integrate car clubs and car club parking within the development, not as an 'add-on' outside the development on public land at Ship Lane. Ship Lane should instead be pedestrianised to create a green walking route from Mortlake Station to the River Thames
- work with TfL and the Borough to establish funding, probably through Section 106 / Community Infrastructure Levy (CIL), to improve buses and cycle and walking routes
- work with the Borough to introduce Controlled Parking Zones throughout the area immediately to help reduce traffic (by restricting commuter parking and discouraging short switchable trips) and in doing so improve bus times, and begin the process of improving public transport, walking and cycling options. Ultimately, the goal should be to work to increase demand for buses to ensure bus routes are financially viable.
- work with the borough to reduce parking provision in the area more generally so making it better for walking and cycling. This would also compensate in some small way for loss of open green space, though note that we do not support the loss of green space in this development.

Watney's historic sports ground

This is a substantial development on a major site where there is no need to remove valuable green space. Good quality, flat, well-drained sports pitches are incredibly rare and need to be preserved particularly where population is increasing. The proposed development removes the option to create nearby green space and community sports pitches for an area which is deficient in green open space.

The school should be planned on the previously developed land within the development and the old sports ground maintained for both the school and the community as publicly accessible park.

Yours sincerely
Alice Roberts
Head of Green Space Campaigns
CPRE London