



20 Fife Road
London SW14 7EL
24 July 2019

Ms Lucy Thatcher
Environment Directorate/Development Management
1B Richmond upon Thames
Civic Centre
44 York Street
Twickenham TW1 3BZ

Dear Madam

Comments on the Revised Plans for the Stag Brewery Site

The Mortlake with East Sheen Society, which has some 400 members and celebrates its 50th anniversary this year, has been campaigning alongside the Mortlake Brewery Community Group (MBCG) for a reduction in the density of the redevelopment proposals. In our representation on the three planning applications in May of last year we objected to the development proposals on the grounds of their being far in excess of what was in the Planning Brief of 2011 and we recommended refusal on grounds of non-compliance with several Local Plan policies.

We have seen the revised plans and addendum reports. It is clear that the revisions are minor and that they have been made in response to comments made by the statutory consultees, not by the local community. We have not seen the comments made by the Environment Agency, Network Rail, Sport England or TfL (they have not appeared on-line) but we have seen the comments of the GLA. Our objections remain the same as before and we have added text below taking into account the comments of the GLA and other events that have occurred since our representation in May of last year.

Application A: Housing and Community Hub

Density

The number of housing units on the site was originally 817 (including 150 care units and excluding 80 nursing home units) and this number has now decreased to 813, of which 439 are located in the eastern part of the site (Phase 1) and 374 (excluding the nursing home) in the western part (Phase 2). The density of the development – with the 80 nursing home units included in the western part – is shown in the table below along with other recent developments for comparison:

Development	History	Number of units	Site area ha	Density units/ha
Harrods Depository	Converted 1990s	260	3.50	74
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Brewery eastern part exc. internal space		439	1.95	225
Brewery western part inc. internal space		454	3.99	114
Brewery western part exc. internal space		454	3.01	151

It is noted that the density in the eastern part of the site (Phase 1) is significantly higher than any other recent riverside development and that, with the internal spaces excluded as they are 're-provisioned' from the existing sports field in the western part, the density is close to that for the Homebase site, which the Council has recently refused on grounds of overdevelopment (subject to direction from the Mayor). The Council is, of course, under huge pressure from the Mayor (and Central Government) to provide more housing including affordable units, but it was interesting to note that at the Examination in Public into the Mayor's Draft New London Plan earlier this year there was much discussion about locating new development in new settlements within 800m of railway stations within the Green Belt (ref. in particular 'Tomorrow's Places' – a plan for building a generation of new millennial towns on the edge of London, Policy Exchange 2019) rather than lumping it onto existing built-up areas already suffering from inadequate transport and social infrastructure.

Urban design and building heights

We note that the GLA comments indicate support for the overall design approach but that "further amendments are required to secure appropriate residential quality and higher standard of urban design." Unlike the Homebase and Barnes Hospital developments the Brewery scheme has never been considered by a Design Review Panel and we urge the Council to give this thought. The revised plans show some changes in elevational treatment and some additional planting but no change in building heights. Parts of the development still exceed the heights indicated in the Planning Brief, both throughout the western part of the site and in the eastern part where the Brief requested upper storeys to be set back from the riverside to minimise overshadowing thereon.

Affordable housing

The GLA comments indicate 17% affordable housing as being unacceptable (we note the New London Plan indicates 50%), also that reductions in parking are required. We note the Viability Report addendum saying that the reduction in parking through the removal of 150 units would result in an increase in the value of affordable housing. However, we question the need for so many parking spaces for a development that is within 300m of Mortlake Station. The Barnes Hospital development, which the Council has recently approved, is 600m distant from Mortlake Station and includes parking at half a

space per unit. The same could surely apply to the Brewery site and some of the construction cost of the basement carpark (£78 million) could thereby be transferred to providing extra affordable units.

Climate Change

The GLA comments indicate that "further clarifications and revisions are required to the energy assessment to verify the carbon savings proposed and to the sustainable drainage strategy." We note that the developer has provided a number of addendum reports but no Energy Strategy Addendum. Why not? We also note that the UK Parliament declared a Climate Change Emergency on 1 May 2019 which the Council has subsequently endorsed on 11 July 2019 urging action plans aimed at the Borough being carbon-neutral by 2030. Why has this issue not been addressed in the revised plans?

In view of the above our objection remains and we continue to recommend refusal on the same grounds as before, viz.

LP1 – local character and design quality, in particular scale, height, massing, density

LP8 – amenity and living conditions, in particular overshadowing

LP36 – affordable housing not sufficiently generous

LP44 – too dense for a PTAL2 zone, hence too much traffic and associated air pollution and too little public transport.

Application B: The Secondary School and Sports Pitch

The Secondary School

The GLA comments indicate that "the mixed use development is supported and the partial loss of playing fields and open space, in view of the education use, is justified... but the Council should ensure that there is a robust and evidenced case for a secondary school." Our view remains that the Council has not addressed the issue of the demand for such a school. Unlike the recent planning application for the Alan Turing School in Hospital Bridge Road which attracted 677 supporters, this application on the Brewery site has attracted only 15. In addition there has been a decline in the birth rate in the Borough from 2,992 in 2010 to 2,441 in 2017 (we await the birth rate for 2018 which will be published on 1 August 2019) and this will have a knock-on effect on secondary schools in the next decade. We remain of the view that the current bulge must be met by temporary provision at both RPA and Christ's.

Nor has the Council addressed the impact of the proposed new school on the two existing schools, namely RPA and Christ's. Our concern is that either the new school will pull custom away from the two existing schools and threaten their 6th form development or that all three schools will suffer from depleting numbers.

Nor has the Council adequately addressed the impact of 1,200 pupils and 150 staff descending upon the school in the morning peak via Lower Richmond Road and the Sheen Lane level crossing and its footbridge. The developer's Transport Assessment has said very little about pupils using bikes, indeed Figure 8.5 of the document shows 23 of the 1,200 pupils arriving on bikes, i.e. 0.02%. This figure has not been updated in the Addendum report but bike parking for the school has at least been increased. Our hunch is that, if the school were built, we could have the prospect of many pupils in Barnes and Kew

gravitating on their bikes towards the towpath to reach the school. While this would be admirable, there could nevertheless be an impact on the towpath which was not designed for such traffic.

It should be noted that the Planning Brief had originally indicated a primary school on the site and that this was changed to a secondary school following the development of a primary school on both sides of the Sheen Lane level crossing. This is a very poor location for such a school due to the inconvenience of the crossing, the narrow width of the footway, the danger of traffic speeding before the barriers come down and the air pollution generated by traffic idling once the barriers are down.

The Sports Pitch

The existing sports pitch provides two grass football pitches separated in the middle by a cricket square and the proposal is to replace the grass pitches with a single all-weather pitch and to 're-provision' the displaced open space to the eastern part of the site. We remain concerned about the loss of the grass, which is OOLTI and has significant aesthetic as well as ecological value, and about its replacement by an artificial surface with fencing and floodlights. We are also particularly concerned about the loss of a cricket ground. The sport has been in decline in recent years and cricket fields are threatened. And yet England has just won the World Cup breathing new life into the game and, in addition, women are showing much greater interest. The Council may argue that grass pitches cannot possibly sustain the pressure of 1,200 pupils but we must point out that two pitches of higher quality grass have the same durability as a single all-weather pitch. We urge the Council to take serious consideration of the representation made by the Chairman of Sport Richmond.

In view of the above our objection remains and we continue to recommend refusal on the same grounds as before, viz.

LP14 – OOLTI protection

LP29 – schools must be conveniently accessible to users

LP44 – too dense for a PTAL2 zone, hence too much traffic and associated air pollution and too little public transport (bus).

Application C: Chalker's Corner

The GLA comments indicate that "further highways impact modelling and a Healthy Streets assessment of the Chalker's Corner proposals are required. Financial contributions to bus service improvements, and conditions and planning obligations are also required." In response the developer's Transport Assessment Addendum reports that TfL has evidently now approved the modelling and Health Streets assessment of the Chalker's Corner proposal; it has also agreed the bus strategy including costs and asked for cycle parking which has since been achieved; and that Network Rail has agreed to improvements to the footbridge including signage, moving bollards back in North and South Worpole Way and setting back vehicle stop lines. As mentioned above, we have not been party to these discussions, we have not seen any comments from these statutory consultees on-line on the Council's website and we reserve our comments on these aspects until we do so.

Until then we remain of the view that the proposed realignment of Lower Richmond Road at Chalker's Corner junction will simply attract more cars and will fill up in no time while other bottlenecks in the

area, notably the Sheen Lane level crossing, will simply generate longer tailbacks as a result. We also remain of the view that the loss of trees and OOLTI at Chalker's Corner will have a devastating impact on the residents of Chertsey Court in terms of noise and air pollution as well as landtake from its front gardens which have OOLTI status.

Finally, did TfL approve the modelling of Chalker's Corner before or after the closure of Hammersmith Bridge in April? It was surely before? We are of the view that the modelling of Chalker's Corner needs to be tested alongside all possible options for the re-opening of Hammersmith Bridge. The whole of Mortlake and East Sheen is currently plagued with major traffic problems while the bridge remains closed. Residents here are experiencing blight – those who are thinking of moving are unable to sell their properties. The Brewery site is served by Lower Richmond Road which is gridlocked for much of the day and we wonder if the site will ever be reasonably accessible while the bridge remains closed.

In view of the above our objection remains and we continue to recommend refusal on the same grounds as before, viz.

- (1) DM OS3 and LP14 - OOLTI protection
- (2) DM TP1 and LP44 - the overall development is too dense for a PTAL2 zone, hence too much traffic and associated air pollution and too little public transport (bus). The proposed reconfiguration is not going to solve this problem.

In addition, we would draw attention to the following:

The National Planning Policy Framework para 12 states: "Where a planning application conflicts with an up-to-date development plan... permission should not usually be granted." We are of the view that the proposals are in conflict with the above policies in the Council's up-to-date development plan, which was formally adopted last July, and that permission cannot be granted.

The Draft New London Plan, which is awaiting approval following its Examination in Public in January-May this year, includes Policy D6 Optimising Density which states "Proposed development that does not demonstrably optimise the density of the site... should be refused." We are of the view that the density of the housing and school is not optimised, rather it is maximised, and that planning permission should therefore be refused.

On a final note the Mortlake with East Sheen Society is in full support of the alternative plan which has been prepared by the Mortlake Brewery Community Group.

Yours faithfully



Shaun Lamplough
Chairman, Mortlake with East Sheen Society



HERITAGE INFORMATION

87 East Sheen Avenue, London, SW14 8AX - TEL. 020 8878 0972 - DATAcrone@hotmail.co.uk

Mr Tim Catchpole
Planning Representative, The Mortlake with East Sheen Society

15th July 2019

Dear Tim

The Stag Brewery, Lower Richmond Road, Mortlake, London, SW14 7ET
Review of Planning Application Refs: 18/0547/FUL and 18/0548/FUL

Thank you for asking me to comment on behalf of the Mortlake with East Sheen Society on the above applications for Planning Permission relating to the comprehensive redevelopment of the former Stag's Brewery site, London Borough of Richmond-upon-Thames.

In my capacity as a heritage and design consultant (please see Appendix 1 for my summary CV for information), a member of the Mortlake with East Sheen Society and a lifelong resident of Sheen (my family have been here for five generations), you suggested that I might like to comment on the proposals in the spirit of Paragraph 129 of the NPPF, which encourages local planning authorities to "make appropriate use of tools and processes for assessing and improving the design of development".

My first observation relates to the proposed layout and density of the proposed buildings within the brewery site. It is core principle of good design that new buildings, routes and open spaces should respond positively to the general pattern of building heights in the area; and views, vistas and landmarks into and out of the development site. The industrial character and bulky industrial grain of the brewery site has historically contrasted with the fine grain of the surrounding residential Victorian and Edwardian townscapes of Mortlake High Street and its hinterland; with the exception of the landmark eight to nine storey maltings building (identified as a building of townscape merit), the low density and scale of the brewery buildings has sat comfortably adjacent to the fine grain of the suburban townscape of Mortlake. This relationship has been compromised somewhat with the introduction of late 20th century unattractive buildings within the site, and therefore this development scheme offers the opportunity to enhance and to better engage the historic core of Mortlake with its riverside setting. I consider however that the proposed layout and density is entirely inappropriate to the local grain and building patterns. The almost grid-like layout fronting the riverside has no relationship with the historic grain of the site, whilst the narrowness of the proposed street layouts and paucity of open spaces, coupled with blocks of six to seven storeys in height and of substantial bulk and

massing, will create a "canyon-like" urban character that almost entirely fails to respond to the established local context.

My other observations relate principally to the settings of nearby heritage assets – that is the surroundings in which those heritage assets are experienced. The proposed development will have an impact on the immediate settings of a large number of heritage assets, including three Conservation Areas, at least eight Grade II statutorily listed buildings (particularly those fronting the riverside adjacent to the Ship Inn), and an even greater number of buildings of townscape merit (non-designated heritage assets) which includes the Ship Inn.

Part of the development site on Mortlake High Street and the Thames shoreline is located within the **Mortlake Conservation Area**. The site as a whole, however, forms part of the immediate setting of the Conservation Area, particularly when entering the Conservation Area from its principal gateway on the Lower Richmond Road from the west (which includes a number of buildings of townscape merit such as the **Jolly Gardeners public house**). The Jolly Gardeners is a key landmark building at the gateway to the Conservation Area, whose significance can be best appreciated from Mortlake Green alongside other buildings of townscape merit on the opposite side of the Lower Richmond Road, all of which form an appropriate suburban and attractive setting (as can be seen within the submitted Townscape Visual Impact Assessment, Viewpoints 1b, 8 and 12). Whilst the modern brewery structures may be considered to detract from the setting of the Jolly Gardeners and the other nearby buildings of townscape merit, I consider the proposed four to six storey blocks would form a looming and dominant backdrop to the locally listed public house, encircling it with buildings of a much greater scale and massing at this key entry point to the Conservation Area along the Lower Richmond Road. Upon entry to the Conservation Area, the proposed density of the development would appear excessive, creating a dense and tight street frontage towards the west end of the High Street which is larger in both height and scale than the existing buildings, including the former hotel within the brewery site (also a building of townscape merit); a character alien to Mortlake would therefore be created which is more akin to an urban/inner city relationship between open spaces and surrounding buildings.

An appreciation and understanding of the character and appearance of the Mortlake Conservation Area, its built form of industrial, commercial and residential happily co-existing, together with the historic relationship with the river is most evident from the north bank of the river. Indeed, the balance of the river and landscape-dominated setting is highlighted within the Council's appraisal as a potential problem or pressure; inappropriate development may obstruct or spoil these views. The existing maltings building on the brewery site is recognised as a local landmark from the north side of the river. I consider that the viewpoints taken from the north side of the river included within the submitted Townscape Visual Impact Assessment (Viewpoints 4 to 6) illustrate the excessive density of the proposal, creating a wall-like development on the south side of the river whose urban character is entirely inappropriate to an appreciation of the riverside setting of the Mortlake Conservation Area. The proposal seeks to reflect the scale, massing and height of the retained maltings building along the river frontage, substantially increasing the density and grain of the buildings across the site which will disrupt the historic contrast in the built form which characterises the townscape of the Conservation Area and will not reflect or respond positively to the local historic character. In consider the proposals fail to preserve or enhance the riverside and landscape setting of the Conservation Area and therefore harm its significance and setting.

There are six **Grade II statutorily listed buildings** within the Mortlake Conservation Area on the southern riverbank which, with the **locally listed Ship Inn**, form an historically distinctive group based on age, character,

scale and use of materials. For the same reasons as outlined above, I consider the settings of these buildings would be adversely affected by the proposed development. The settings of these heritage assets are divided between the river to the north and the largely residential domestic-scale townscape to the south (although this includes some unattractive 20th century elements within the brewery site); both the river and townscape settings contribute positively to the aesthetic and historical significance of these buildings and can be appreciated and understood from the well-used towpath approaching from the east from the White Hart public house (as illustrated in Viewpoint 7 within the submitted Townscape and Visual Impact Assessment). However these qualities are equally, if not better, appreciated from the elevated position of the Grade II listed Chiswick Bridge – particularly the north side - where they can be seen and understood as a harmonious and attractive group. Indeed, the setting of Chiswick Bridge is characterised by expansive views across the river from the viewing platforms which allow good vantage points. Such views from the bridge towards the Mortlake Conservation Area and group of statutorily and locally listed buildings on the southern riverbank are likely to be cherished by local communities on both north and south sides of the river, and valued regionally and nationally due to the status of the annual Oxford and Cambridge Boat Race. Whilst the maltings building within the site anchors the statutorily and locally listed buildings with the wider industrial history of this part of Mortlake, I consider that the introduction of a looming urban development of an excessive scale and density along the river frontage within the immediate settings of these statutorily listed and locally listed buildings would harm an appreciation and understanding of their riverside setting, and of the landscape setting of the Grade II listed Chiswick Bridge both from the north side of the river and from the riverside footpath when approaching from the east.

In addition, the **Grove Park Conservation Area** (London Borough of Hounslow) is located on the north bank of the river adjacent to the Grade II listed Chiswick Bridge. Whilst the supporting information dismisses this Conservation Area as too distant to be affected by the proposed development, I would consider its riverside setting to be of paramount importance in appreciating and understanding its significance given that the open river setting provides an important contrast to the fine grain of the Victorian housing estates surrounded by large open spaces. I consider that the introduction of a looming urban development of considerably greater scale and density along the southern river frontage would harm an appreciation and understanding of the riverside setting of this Conservation Area.

The character and appearance of the **Mortlake Green Conservation Area** is largely derived from the open space of the Green framed by terraces which have been identified as buildings of townscape merit, a highly suburban character and townscape. The brewery site forms a backdrop to the Conservation Area in views from the Green and the existing historic buildings within the site (the former hotel, bottling building and the maltings – identified as buildings of townscape merit) as well as the locally listed Jolly Gardeners public house contribute positively to the setting of the Conservation Area (as illustrated in Viewpoints 9 and 10 within the submitted Townscape Visual Impact Assessment). Although there are some late 20th century unattractive industrial elements present in these views, the setting is largely suburban in its townscape qualities, with only the industrial chimney breaking the skyline and exceeding the height of the trees. By contrast, the proposed development would form a looming and dominant backdrop within the setting of the Conservation Area in views from the Green, creating a wall-like development around the former hotel, Jolly Gardeners and the bottling building giving the appearance of a continuous street frontage towards the river which breaks the treeline and introduces an inappropriately urban character in this most suburban of environments. I consider that the introduction of such a large-scale development within the immediate setting of the Conservation Area would harm an appreciation and understanding of its significance, particularly in failing to preserve or enhance the landscape/townscape setting of the Green.

The first objective of the strategic vision of the Richmond-upon-Thames Local Plan (July 2018) is to protect local character. This is supported by Policy LP 1 which demands that developments must be compatible with the local character and relationship to existing townscape in terms of local grain, scale, density, proportions and massing. Policy LP 2 goes on to state that new buildings must respect and strengthen the setting of valued townscapes and landscapes through appropriate building heights and enhance the character of an area where possible through appropriate scale, height, mass, urban pattern and development grain. Policy LP 3 requires developments to conserve and enhance the significance and settings of all designated heritage assets, whilst Policy LP 4 seeks to preserve and enhance the character and setting of non-designated heritage assets (including buildings of townscape merit). For the reasons repeated throughout this letter, I do not consider that the proposed scheme on the brewery site complies with these local planning policies by nature of its inappropriate and excessive density, urban character, scale, height and mass. The proposed development does not enhance or better reveal the significance or settings of the three identified Conservation Areas and the statutorily listed buildings fronting the river, contrary to paragraph 200 of the NPPF. Indeed, I would consider the proposed development to cause harm to the significance and settings of these heritage assets.

Section 12 of the revised NPPF (July 2018 and updated February 2019) "Achieving Well-Designed Places" places great emphasis on the importance of good design in achieving sustainable development and making development acceptable to local communities. My review has also therefore evaluated the proposals according to the eight principles of the *Building in Context Toolkit* (2001) which was formulated by English Heritage and CABE to stimulate a high standard of design for development taking place in historically sensitive contexts (see Appendix 2). I do not consider that the proposals have taken account of the eight principles, particularly in ensuring the character and identity of the site will be appropriate to its use and context (Principle 3), designing forms and massing so the development sits happily in the pattern of existing development (Principle 4), respecting important views from within and towards the River Thames and the three identified Conservation Areas (Principle 5) and respecting the scale of neighbouring buildings (Principle 6).

I note that the applicants have not submitted the redevelopment scheme to the Richmond-upon-Thames Design Review Panel for review and comment. I am a member of the Richmond-upon-Thames Design Review Panel and a member of a number of other DRPs in the Greater London region; I consider that engagement with the design review process is a beneficial exercise for developers and stakeholders in ensuring a high standard of good design. Section 12 of the NPPF strongly encourages the use of such tools and engagement in order to assess and improve the design of development by both applicants and local authorities, particularly for large-scale developments such as that being proposed on the Stag's Brewery site (paragraph 129). Whilst I recognise that the application was submitted prior to the publication of the revised NPPF, it should be noted that paragraph 62 of the 2012 NPPF also recommended that local authorities have a design review process in place to provide an objective assessment. I consider the proposed development to be of sufficient size and to have so major an impact on the local character, townscape, historic environment and community that the failure to engage with the design review process has been a missed opportunity to the detriment of some of the most fundamental principles of good design.

In conclusion, I consider the proposed redevelopment scheme for the Stag's Brewery site, by nature of the inappropriate density and the massive bulk, scale and mass of the buildings, will have a negative impact not only on the significance and settings of a number nearby Grade II statutorily listed buildings, but also on the settings of three Conservation Areas and nearby non-designated heritage assets (buildings of townscape merit). I consider

the applications therefore fail to satisfy the clauses of national and local planning policy and guidance in relation to the historic environment. The proposals may well set an unfortunate precedent for the construction of massive scale redevelopments of an urban character within the suburban settings of heritage assets. The policies of NPPF Chapter 12 are of particular relevance to these proposals. Paragraph 127 notes that planning decisions should ensure that developments "...add to the overall quality of the area...are visually attractive as a result of good architecture, layout, and appropriate and sympathetic landscaping...are sympathetic to local character and history." I suggest the proposals fail to respond to these aims. Paragraph 130 of the revised NPPF states that planning permission should be refused for development of poor design which fails to improve the quality and character of an area and I strongly feel that the submitted proposals for the Stag's Brewery site will also fail this requirement.

Yours sincerely

Dorian A. T. A. Crone RIBA MRTPI IHBC
Heritage and Design Consultant

Appendix 1: Brief Summary CV

DORIAN A.T.A. CRONE BA, BAArch, DipTP, RIBA, MRTPL, IHBC

Chartered Architect & Town Planner - Heritage Design Consultant

Dorian has been a Chartered Architect and Chartered Town Planner for over 30 years. He has also been a member of the Institute of Historic Building Conservation for 25 years.

Dorian is a Guardian of The Society for the Protection of Ancient Buildings, and a committee member of the International Committee on Monuments and Sites (ICOMOS), ICOMOS UK and Institute of Historic Building Conservation. He has been a court member with the Worshipful Company of Chartered Architects and a trustee of the Hampstead Garden Suburb Trust. He is currently a trustee of both the Dance and Drake Trusts.

Dorian worked for over 30 years as Historic Buildings and Areas Inspector with English Heritage, responsible for providing advice to all the London Boroughs (including Richmond-upon-Thames) and both the City Councils. Dorian has also worked as a consultant and expert witness for over 20 years, advising a wide variety of clients on heritage and design matters involving development work, alterations, extensions and new build projects associated with listed buildings and conservation areas in design and heritage sensitive locations.

He is a panel member of the John Betjeman Design Award and the City of London Heritage Award, and is a Design Review Panel member of the South West Region, the London Boroughs of Richmond upon Thames, Islington and Wandsworth, and the Design Council.

Dorian has also been involved with the Royal Academy Summer Exhibition Architectural Awards and the Philip Webb Award along with a number other public sector and commercial design awards.

Thatcher, Lucy

From: Tim Catchpole [REDACTED]
Sent: 24 July 2019 15:40
To: StagBreweryRedevelopment
Cc: Lamplough; Dorian Crone; PETER EATON
Subject: Brewery Revised Plans
Attachments: Comments on Brewery revised plans.pdf; Stag Brewery Objection Letter re heritage.pdf

For the attention of Lucy Thatcher

Dear Lucy

Thank you for giving us the opportunity to comment on the revised plans for the Brewery site.

I am sending you the comments of the Mortlake with East Sheen Society signed by its Chairman, Shaun Lamplough.

I am also sending you the comments of our local heritage specialist, Dorian Crone. He has insisted that the revised plans should be the subject of an independent Design Review, as were the recent plans for the Barnes Hospital and Homebase sites. The original Brewery plans were not subject to such review as they pre-dated the final merging of the Richmond and Wandsworth services although such reviews had been handled by Wandsworth for several years before the merger. Mr Crone participated in the Design Review of the Barnes Hospital plans and admits to not being eligible for such a review of the Brewery plans because of a conflict of interest. That said, I agree with him - this development has a London-wide significance and there should indeed be an independent Design Review of these revised plans.

With best regards

Tim Catchpole. FRTP
Planning Advisor to the Mortlake Brewery Community Group and the Mortlake with East Sheen Society

P.S. I have not attempted to post these two attachments on your website on-line, knowing them to be too long, but would be grateful if you could do so at your end.



20 Fife Road
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Ms Lucy Thatcher
Environment Directorate/Development Management
1B Richmond upon Thames
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We note that the GLA comments indicate support for the overall design approach but that "further amendments are required to secure appropriate residential quality and higher standard of urban design." Unlike the Homebase and Barnes Hospital developments the Brewery scheme has never been considered by a Design Review Panel and we urge the Council to give this thought. The revised plans show some changes in elevational treatment and some additional planting but no change in building heights. Parts of the development still exceed the heights indicated in the Planning Brief, both throughout the western part of the site and in the eastern part where the Brief requested upper storeys to be set back from the riverside to minimise overshadowing thereon.

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space per unit. The same could surely apply to the Brewery site and some of the construction cost of the basement carpark (£78 million) could thereby be transferred to providing extra affordable units.

Climate Change

The GLA comments indicate that "further clarifications and revisions are required to the energy assessment to verify the carbon savings proposed and to the sustainable drainage strategy." We note that the developer has provided a number of addendum reports but no Energy Strategy Addendum. Why not? We also note that the UK Parliament declared a Climate Change Emergency on 1 May 2019 which the Council has subsequently endorsed on 11 July 2019 urging action plans aimed at the Borough being carbon-neutral by 2030. Why has this issue not been addressed in the revised plans?

In view of the above our objection remains and we continue to recommend refusal on the same grounds as before, viz.

LP1 – local character and design quality, in particular scale, height, massing, density

LP8 – amenity and living conditions, in particular overshadowing

LP36 – affordable housing not sufficiently generous

LP44 – too dense for a PTAL2 zone, hence too much traffic and associated air pollution and too little public transport.

Application B: The Secondary School and Sports Pitch

The Secondary School

The GLA comments indicate that "the mixed use development is supported and the partial loss of playing fields and open space, in view of the education use, is justified... but the Council should ensure that there is a robust and evidenced case for a secondary school." Our view remains that the Council has not addressed the issue of the demand for such a school. Unlike the recent planning application for the Alan Turing School in Hospital Bridge Road which attracted 677 supporters, this application on the Brewery site has attracted only 15. In addition there has been a decline in the birth rate in the Borough from 2,992 in 2010 to 2,441 in 2017 (we await the birth rate for 2018 which will be published on 1 August 2019) and this will have a knock-on effect on secondary schools in the next decade. We remain of the view that the current bulge must be met by temporary provision at both RPA and Christ's.

Nor has the Council addressed the impact of the proposed new school on the two existing schools, namely RPA and Christ's. Our concern is that either the new school will pull custom away from the two existing schools and threaten their 6th form development or that all three schools will suffer from depleting numbers.

Nor has the Council adequately addressed the impact of 1,200 pupils and 150 staff descending upon the school in the morning peak via Lower Richmond Road and the Sheen Lane level crossing and its footbridge. The developer's Transport Assessment has said very little about pupils using bikes, indeed Figure 8.5 of the document shows 23 of the 1,200 pupils arriving on bikes, i.e. 0.02%. This figure has not been updated in the Addendum report but bike parking for the school has at least been increased. Our hunch is that, if the school were built, we could have the prospect of many pupils in Barnes and Kew

gravitating on their bikes towards the towpath to reach the school. While this would be admirable, there could nevertheless be an impact on the towpath which was not designed for such traffic.

It should be noted that the Planning Brief had originally indicated a primary school on the site and that this was changed to a secondary school following the development of a primary school on both sides of the Sheen Lane level crossing. This is a very poor location for such a school due to the inconvenience of the crossing, the narrow width of the footway, the danger of traffic speeding before the barriers come down and the air pollution generated by traffic idling once the barriers are down.

The Sports Pitch

The existing sports pitch provides two grass football pitches separated in the middle by a cricket square and the proposal is to replace the grass pitches with a single all-weather pitch and to 're-provision' the displaced open space to the eastern part of the site. We remain concerned about the loss of the grass, which is OOLTI and has significant aesthetic as well as ecological value, and about its replacement by an artificial surface with fencing and floodlights. We are also particularly concerned about the loss of a cricket ground. The sport has been in decline in recent years and cricket fields are threatened. And yet England has just won the World Cup breathing new life into the game and, in addition, women are showing much greater interest. The Council may argue that grass pitches cannot possibly sustain the pressure of 1,200 pupils but we must point out that two pitches of higher quality grass have the same durability as a single all-weather pitch. We urge the Council to take serious consideration of the representation made by the Chairman of Sport Richmond.

In view of the above our objection remains and we continue to recommend refusal on the same grounds as before, viz.

LP14 – OOLTI protection

LP29 – schools must be conveniently accessible to users

LP44 – too dense for a PTAL2 zone, hence too much traffic and associated air pollution and too little public transport (bus).

Application C: Chalker's Corner

The GLA comments indicate that "further highways impact modelling and a Healthy Streets assessment of the Chalker's Corner proposals are required. Financial contributions to bus service improvements, and conditions and planning obligations are also required." In response the developer's Transport Assessment Addendum reports that TfL has evidently now approved the modelling and Health Streets assessment of the Chalker's Corner proposal; it has also agreed the bus strategy including costs and asked for cycle parking which has since been achieved; and that Network Rail has agreed to improvements to the footbridge including signage, moving bollards back in North and South Worpole Way and setting back vehicle stop lines. As mentioned above, we have not been party to these discussions, we have not seen any comments from these statutory consultees on-line on the Council's website and we reserve our comments on these aspects until we do so.

Until then we remain of the view that the proposed realignment of Lower Richmond Road at Chalker's Corner junction will simply attract more cars and will fill up in no time while other bottlenecks in the

area, notably the Sheen Lane level crossing, will simply generate longer tailbacks as a result. We also remain of the view that the loss of trees and OOLTI at Chalker's Corner will have a devastating impact on the residents of Chertsey Court in terms of noise and air pollution as well as landtake from its front gardens which have OOLTI status.

Finally, did TfL approve the modelling of Chalker's Corner before or after the closure of Hammersmith Bridge in April? It was surely before? We are of the view that the modelling of Chalker's Corner needs to be tested alongside all possible options for the re-opening of Hammersmith Bridge. The whole of Mortlake and East Sheen is currently plagued with major traffic problems while the bridge remains closed. Residents here are experiencing blight – those who are thinking of moving are unable to sell their properties. The Brewery site is served by Lower Richmond Road which is gridlocked for much of the day and we wonder if the site will ever be reasonably accessible while the bridge remains closed.

In view of the above our objection remains and we continue to recommend refusal on the same grounds as before, viz.

- (1) DM OS3 and LP14 - OOLTI protection
- (2) DM TP1 and LP44 - the overall development is too dense for a PTAL2 zone, hence too much traffic and associated air pollution and too little public transport (bus). The proposed reconfiguration is not going to solve this problem.

In addition, we would draw attention to the following:

The National Planning Policy Framework para 12 states: "Where a planning application conflicts with an up-to-date development plan... permission should not usually be granted." We are of the view that the proposals are in conflict with the above policies in the Council's up-to-date development plan, which was formally adopted last July, and that permission cannot be granted.

The Draft New London Plan, which is awaiting approval following its Examination in Public in January-May this year, includes Policy D6 Optimising Density which states "Proposed development that does not demonstrably optimise the density of the site... should be refused." We are of the view that the density of the housing and school is not optimised, rather it is maximised, and that planning permission should therefore be refused.

On a final note the Mortlake with East Sheen Society is in full support of the alternative plan which has been prepared by the Mortlake Brewery Community Group.

Yours faithfully



Shaun Lamplough
Chairman, Mortlake with East Sheen Society



HERITAGE INFORMATION

87 East Sheen Avenue, London, SW14 8AX - TEL. 020 8878 0972 - DATAcrone@hotmail.co.uk

Mr Tim Catchpole
Planning Representative, The Mortlake with East Sheen Society

15th July 2019

Dear Tim

The Stag Brewery, Lower Richmond Road, Mortlake, London, SW14 7ET
Review of Planning Application Refs: 18/0547/FUL and 18/0548/FUL

Thank you for asking me to comment on behalf of the Mortlake with East Sheen Society on the above applications for Planning Permission relating to the comprehensive redevelopment of the former Stag's Brewery site, London Borough of Richmond-upon-Thames.

In my capacity as a heritage and design consultant (please see Appendix 1 for my summary CV for information), a member of the Mortlake with East Sheen Society and a lifelong resident of Sheen (my family have been here for five generations), you suggested that I might like to comment on the proposals in the spirit of Paragraph 129 of the NPPF, which encourages local planning authorities to "make appropriate use of tools and processes for assessing and improving the design of development".

My first observation relates to the proposed layout and density of the proposed buildings within the brewery site. It is core principle of good design that new buildings, routes and open spaces should respond positively to the general pattern of building heights in the area; and views, vistas and landmarks into and out of the development site. The industrial character and bulky industrial grain of the brewery site has historically contrasted with the fine grain of the surrounding residential Victorian and Edwardian townscapes of Mortlake High Street and its hinterland; with the exception of the landmark eight to nine storey mallings building (identified as a building of townscape merit), the low density and scale of the brewery buildings has sat comfortably adjacent to the fine grain of the suburban townscape of Mortlake. This relationship has been compromised somewhat with the introduction of late 20th century unattractive buildings within the site, and therefore this development scheme offers the opportunity to enhance and to better engage the historic core of Mortlake with its riverside setting. I consider however that the proposed layout and density is entirely inappropriate to the local grain and building patterns. The almost grid-like layout fronting the riverside has no relationship with the historic grain of the site, whilst the narrowness of the proposed street layouts and paucity of open spaces, coupled with blocks of six to seven storeys in height and of substantial bulk and

massing, will create a "canyon-like" urban character that almost entirely fails to respond to the established local context.

My other observations relate principally to the settings of nearby heritage assets – that is the surroundings in which those heritage assets are experienced. The proposed development will have an impact on the immediate settings of a large number of heritage assets, including three Conservation Areas, at least eight Grade II statutorily listed buildings (particularly those fronting the riverside adjacent to the Ship Inn), and an even greater number of buildings of townscape merit (non-designated heritage assets) which includes the Ship Inn.

Part of the development site on Mortlake High Street and the Thames shoreline is located within the **Mortlake Conservation Area**. The site as a whole, however, forms part of the immediate setting of the Conservation Area, particularly when entering the Conservation Area from its principal gateway on the Lower Richmond Road from the west (which includes a number of buildings of townscape merit such as the **Jolly Gardeners public house**). The Jolly Gardeners is a key landmark building at the gateway to the Conservation Area, whose significance can be best appreciated from Mortlake Green alongside other buildings of townscape merit on the opposite side of the Lower Richmond Road, all of which form an appropriate suburban and attractive setting (as can be seen within the submitted Townscape Visual Impact Assessment, Viewpoints 1b, 8 and 12). Whilst the modern brewery structures may be considered to detract from the setting of the Jolly Gardeners and the other nearby buildings of townscape merit, I consider the proposed four to six storey blocks would form a looming and dominant backdrop to the locally listed public house, encircling it with buildings of a much greater scale and massing at this key entry point to the Conservation Area along the Lower Richmond Road. Upon entry to the Conservation Area, the proposed density of the development would appear excessive, creating a dense and tight street frontage towards the west end of the High Street which is larger in both height and scale than the existing buildings, including the former hotel within the brewery site (also a building of townscape merit); a character alien to Mortlake would therefore be created which is more akin to an urban/inner city relationship between open spaces and surrounding buildings.

An appreciation and understanding of the character and appearance of the Mortlake Conservation Area, its built form of industrial, commercial and residential happily co-existing, together with the historic relationship with the river is most evident from the north bank of the river. Indeed, the balance of the river and landscape-dominated setting is highlighted within the Council's appraisal as a potential problem or pressure; inappropriate development may obstruct or spoil these views. The existing maltings building on the brewery site is recognised as a local landmark from the north side of the river. I consider that the viewpoints taken from the north side of the river included within the submitted Townscape Visual Impact Assessment (Viewpoints 4 to 6) illustrate the excessive density of the proposal, creating a wall-like development on the south side of the river whose urban character is entirely inappropriate to an appreciation of the riverside setting of the Mortlake Conservation Area. The proposal seeks to reflect the scale, massing and height of the retained maltings building along the river frontage, substantially increasing the density and grain of the buildings across the site which will disrupt the historic contrast in the built form which characterises the townscape of the Conservation Area and will not reflect or respond positively to the local historic character. In consider the proposals fail to preserve or enhance the riverside and landscape setting of the Conservation Area and therefore harm its significance and setting.

There are six **Grade II statutorily listed buildings** within the Mortlake Conservation Area on the southern riverbank which, with the **locally listed Ship Inn**, form an historically distinctive group based on age, character,

scale and use of materials. For the same reasons as outlined above, I consider the settings of these buildings would be adversely affected by the proposed development. The settings of these heritage assets are divided between the river to the north and the largely residential domestic-scale townscape to the south (although this includes some unattractive 20th century elements within the brewery site); both the river and townscape settings contribute positively to the aesthetic and historical significance of these buildings and can be appreciated and understood from the well-used towpath approaching from the east from the White Hart public house (as illustrated in Viewpoint 7 within the submitted Townscape and Visual Impact Assessment). However these qualities are equally, if not better, appreciated from the elevated position of the Grade II listed Chiswick Bridge – particularly the north side - where they can be seen and understood as a harmonious and attractive group. Indeed, the setting of Chiswick Bridge is characterised by expansive views across the river from the viewing platforms which allow good vantage points. Such views from the bridge towards the Mortlake Conservation Area and group of statutorily and locally listed buildings on the southern riverbank are likely to be cherished by local communities on both north and south sides of the river, and valued regionally and nationally due to the status of the annual Oxford and Cambridge Boat Race. Whilst the maltings building within the site anchors the statutorily and locally listed buildings with the wider industrial history of this part of Mortlake, I consider that the introduction of a looming urban development of an excessive scale and density along the river frontage within the immediate settings of these statutorily listed and locally listed buildings would harm an appreciation and understanding of their riverside setting, and of the landscape setting of the Grade II listed Chiswick Bridge both from the north side of the river and from the riverside footpath when approaching from the east.

In addition, the **Grove Park Conservation Area** (London Borough of Hounslow) is located on the north bank of the river adjacent to the Grade II listed Chiswick Bridge. Whilst the supporting information dismisses this Conservation Area as too distant to be affected by the proposed development, I would consider its riverside setting to be of paramount importance in appreciating and understanding its significance given that the open river setting provides an important contrast to the fine grain of the Victorian housing estates surrounded by large open spaces. I consider that the introduction of a looming urban development of considerably greater scale and density along the southern river frontage would harm an appreciation and understanding of the riverside setting of this Conservation Area.

The character and appearance of the **Mortlake Green Conservation Area** is largely derived from the open space of the Green framed by terraces which have been identified as buildings of townscape merit, a highly suburban character and townscape. The brewery site forms a backdrop to the Conservation Area in views from the Green and the existing historic buildings within the site (the former hotel, bottling building and the maltings – identified as buildings of townscape merit) as well as the locally listed Jolly Gardeners public house contribute positively to the setting of the Conservation Area (as illustrated in Viewpoints 9 and 10 within the submitted Townscape Visual Impact Assessment). Although there are some late 20th century unattractive industrial elements present in these views, the setting is largely suburban in its townscape qualities, with only the industrial chimney breaking the skyline and exceeding the height of the trees. By contrast, the proposed development would form a looming and dominant backdrop within the setting of the Conservation Area in views from the Green, creating a wall-like development around the former hotel, Jolly Gardeners and the bottling building giving the appearance of a continuous street frontage towards the river which breaks the treeline and introduces an inappropriately urban character in this most suburban of environments. I consider that the introduction of such a large-scale development within the immediate setting of the Conservation Area would harm an appreciation and understanding of its significance, particularly in failing to preserve or enhance the landscape/townscape setting of the Green.

The first objective of the strategic vision of the Richmond-upon-Thames Local Plan (July 2018) is to protect local character. This is supported by Policy LP 1 which demands that developments must be compatible with the local character and relationship to existing townscape in terms of local grain, scale, density, proportions and massing. Policy LP 2 goes on to state that new buildings must respect and strengthen the setting of valued townscapes and landscapes through appropriate building heights and enhance the character of an area where possible through appropriate scale, height, mass, urban pattern and development grain. Policy LP 3 requires developments to conserve and enhance the significance and settings of all designated heritage assets, whilst Policy LP 4 seeks to preserve and enhance the character and setting of non-designated heritage assets (including buildings of townscape merit). For the reasons repeated throughout this letter, I do not consider that the proposed scheme on the brewery site complies with these local planning policies by nature of its inappropriate and excessive density, urban character, scale, height and mass. The proposed development does not enhance or better reveal the significance or settings of the three identified Conservation Areas and the statutorily listed buildings fronting the river, contrary to paragraph 200 of the NPPF. Indeed, I would consider the proposed development to cause harm to the significance and settings of these heritage assets.

Section 12 of the revised NPPF (July 2018 and updated February 2019) "Achieving Well-Designed Places" places great emphasis on the importance of good design in achieving sustainable development and making development acceptable to local communities. My review has also therefore evaluated the proposals according to the eight principles of the *Building in Context Toolkit* (2001) which was formulated by English Heritage and CABE to stimulate a high standard of design for development taking place in historically sensitive contexts (see Appendix 2). I do not consider that the proposals have taken account of the eight principles, particularly in ensuring the character and identity of the site will be appropriate to its use and context (Principle 3), designing forms and massing so the development sits happily in the pattern of existing development (Principle 4), respecting important views from within and towards the River Thames and the three identified Conservation Areas (Principle 5) and respecting the scale of neighbouring buildings (Principle 6).

I note that the applicants have not submitted the redevelopment scheme to the Richmond-upon-Thames Design Review Panel for review and comment. I am a member of the Richmond-upon-Thames Design Review Panel and a member of a number of other DRPs in the Greater London region; I consider that engagement with the design review process is a beneficial exercise for developers and stakeholders in ensuring a high standard of good design. Section 12 of the NPPF strongly encourages the use of such tools and engagement in order to assess and improve the design of development by both applicants and local authorities, particularly for large-scale developments such as that being proposed on the Stag's Brewery site (paragraph 129). Whilst I recognise that the application was submitted prior to the publication of the revised NPPF, it should be noted that paragraph 62 of the 2012 NPPF also recommended that local authorities have a design review process in place to provide an objective assessment. I consider the proposed development to be of sufficient size and to have so major an impact on the local character, townscape, historic environment and community that the failure to engage with the design review process has been a missed opportunity to the detriment of some of the most fundamental principles of good design.

In conclusion, I consider the proposed redevelopment scheme for the Stag's Brewery site, by nature of the inappropriate density and the massive bulk, scale and mass of the buildings, will have a negative impact not only on the significance and settings of a number nearby Grade II statutorily listed buildings, but also on the settings of three Conservation Areas and nearby non-designated heritage assets (buildings of townscape merit). I consider

the applications therefore fail to satisfy the clauses of national and local planning policy and guidance in relation to the historic environment. The proposals may well set an unfortunate precedent for the construction of massive scale redevelopments of an urban character within the suburban settings of heritage assets. The policies of NPPF Chapter 12 are of particular relevance to these proposals. Paragraph 127 notes that planning decisions should ensure that developments "...add to the overall quality of the area...are visually attractive as a result of good architecture, layout, and appropriate and sympathetic landscaping...are sympathetic to local character and history." I suggest the proposals fail to respond to these aims. Paragraph 130 of the revised NPPF states that planning permission should be refused for development of poor design which fails to improve the quality and character of an area and I strongly feel that the submitted proposals for the Stag's Brewery site will also fail this requirement.

Yours sincerely

Dorian A. T. A. Crone RIBA MRTPI IHBC
Heritage and Design Consultant

Appendix 1: Brief Summary CV

DORIAN A.T.A. CRONE BA, BAArch, DipTP, RIBA, MRTPL, IHBC

Chartered Architect & Town Planner - Heritage Design Consultant

Dorian has been a Chartered Architect and Chartered Town Planner for over 30 years. He has also been a member of the Institute of Historic Building Conservation for 25 years.

Dorian is a Guardian of The Society for the Protection of Ancient Buildings, and a committee member of the International Committee on Monuments and Sites (ICOMOS), ICOMOS UK and Institute of Historic Building Conservation. He has been a court member with the Worshipful Company of Chartered Architects and a trustee of the Hampstead Garden Suburb Trust. He is currently a trustee of both the Dance and Drake Trusts.

Dorian worked for over 30 years as Historic Buildings and Areas Inspector with English Heritage, responsible for providing advice to all the London Boroughs (including Richmond-upon-Thames) and both the City Councils. Dorian has also worked as a consultant and expert witness for over 20 years, advising a wide variety of clients on heritage and design matters involving development work, alterations, extensions and new build projects associated with listed buildings and conservation areas in design and heritage sensitive locations.

He is a panel member of the John Betjeman Design Award and the City of London Heritage Award, and is a Design Review Panel member of the South West Region, the London Boroughs of Richmond upon Thames, Islington and Wandsworth, and the Design Council.

Dorian has also been involved with the Royal Academy Summer Exhibition Architectural Awards and the Philip Webb Award along with a number other public sector and commercial design awards.

Thatcher, Lucy

From: Tim Catchpole [REDACTED]
Sent: 24 July 2019 15:40
To: StagBreweryRedevelopment
Cc: Lamplough; Dorian Crone; PETER EATON
Subject: Brewery Revised Plans
Attachments: Comments on Brewery revised plans.pdf; Stag Brewery Objection Letter re heritage.pdf

For the attention of Lucy Thatcher

Dear Lucy

Thank you for giving us the opportunity to comment on the revised plans for the Brewery site.

I am sending you the comments of the Mortlake with East Sheen Society signed by its Chairman, Shaun Lamplough.

I am also sending you the comments of our local heritage specialist, Dorian Crone. He has insisted that the revised plans should be the subject of an independent Design Review, as were the recent plans for the Barnes Hospital and Homebase sites. The original Brewery plans were not subject to such review as they pre-dated the final merging of the Richmond and Wandsworth services although such reviews had been handled by Wandsworth for several years before the merger. Mr Crone participated in the Design Review of the Barnes Hospital plans and admits to not being eligible for such a review of the Brewery plans because of a conflict of interest. That said, I agree with him - this development has a London-wide significance and there should indeed be an independent Design Review of these revised plans.

With best regards

Tim Catchpole. FRTPi
Planning Advisor to the Mortlake Brewery Community Group and the Mortlake with East Sheen Society

P.S. I have not attempted to post these two attachments on your website on-line, knowing them to be too long, but would be grateful if you could do so at your end.