

Thatcher, Lucy

From: Diana Roth [REDACTED]
Sent: 24 July 2019 19:30
To: StagBreweryRedevelopment
Subject: STAG BREWERY 18/0547/FUL Application A Reconsultation

From: **THE TOWPATH GROUP**
44 Leyborne Park, TW9 3HA

Dear Sir/Madam

18/0547/FUL Stag Brewery Application A/ Reconsultation

The TowPath Group (TPG) submits, with regret, further comment on the Landscape plans/revisions affecting the Towpath. We had not expected to comment again in such detail but as our concerns (see email of 13 May 2018) appear to have been ignored by the developer, it is imperative we restate them.

The Towpath is NOT a part of the development. We appreciate it will have to be used to access the Flood Defence walls for both demolition and rebuilding, but expect it to be restored and upgraded where essential only. We foresee the closure of the Towpath from SHIP LANE to BULL'S ALLEY or possibly further east, for the duration of the work on the East Site A. We would like to know what the plans are to provide alternative public access to the Towpath and Thames Path/National Trail.

As we have endlessly stated, this stretch of the River Thames forms a vital part of the cherished Rural Wooded Towpath of West London, and it is also part of the Thames Path/National Trail. For more than 15 years the TPG has worked with Richmond, the PLA, EA, TP/NT, TSKC and other Stakeholders, to care for and enhance our riverside, the maintenance of the Towpath, and the management and replanting of trees. We appreciate and enjoy the interaction between the Groups, and believe that we have a good working relationship which can facilitate and improve our precious heritage.

Obviously extensive restitution of the actual TP and the land on the river side of the site boundary (Flood Defence wall) will have to be made but, unfortunately the developer does not seem to understand the essence of this varied rural landscape. For instance, they refer to creating gaps in the riverside vegetation to install benches to provide enjoyment of cross-river 'views'. There are NO potentially attractive cross river 'Views' here: the current benches are carefully sited at an angle on Brewery Wharf, to take in the Upstream and Downstream views of the River and its setting. The introduction of play areas would be inappropriate on the Towpath. The public areas referred to should be within the development not encroaching onto the Towpath. In this context (encroachment), the Riverside Terrace of the development appears to overhang the Towpath rather strangely. The 'Grand Steps' (as described), descending from the 'Plaza' to access the TP would be completely out of character. This is Mortlake, not 'grand' Richmond.

As far as the Towpath itself is concerned, (the area between the river revetments and the back/flood defence wall), this should be restored as closely as possible to its existing form. Trees (natural/native) and vegetation grow between the path and the revetments, and there is the opportunity to enhance the green line (corridor) by much needed tree planting between the path and the rear wall. (Note: what does 'Riparian Planting' mean?). The Towpath has a mixed gravel and natural surface and is non-uniform. It is not paved. The surface can be improved certainly but in accordance with adjacent towpath treatment. Under NO circumstances should the Towpath height be raised. Tree work, removal, pruning and replanting, should be done with full consultation with the applicable entity/groups...ie we would expect the TPG to be part of this process. The TPG has so far successfully resisted the installation of any History/Interpretation board on the Mortlake TP and will continue to do so, if the developer wishes to install one, they should keep it within the development not put it on the Towpath.

The other major concerns are Light Pollution from the development and its impact on both the River and the Wildlife. We re-iterate that this a very dark rural section of Riverside, and sparse acknowledgement and scant explanation have been given to its impact and prevention. Although the landscape designers, Gillespies, were given copies of Richmond's leaflet on Rivers and Light Pollution by us. There is also the Noise Pollution to address, and we would be interested in proposals to deal with this.

Finally, the proposed height and bulk of the development specifically on the River side, overshadow the River to its detriment. As already stated, this is not Richmond and neither merits nor expects a 'Grand Statement' as suggested by these proposals. No acknowledgement has been made of the specialness of this site because of its riverside location, and, indeed, the proposals seem to be all about dominating and overbearing the River rather than enhancing the setting. It is also relevant here to raise the issue of the definition of 'Ground Level'. Where a riverside site is concerned, particularly one with a comparatively long River Frontage and the impact is multiplied accordingly, we maintain that Ground Level should be defined as the height of the EXISTING Towpath, not the level within the site or a higher street level. At a recent event, VIEWS MATTER, hosted by the Thames Landscape Strategy at Kew, we discussed this with various eminent Landscape architects and authorities: they were all in agreement that Towpath height should equal Ground Level of the development. We would stress this requirement. In an 'urban' environment this would surely be the case, so it is even more important in this 'rural' situation where so much irrevocable damage can be done to the landscape and the River Thames.

Yours faithfully

Diana Roth
Chair, TowPath Group

Sent from my iPad

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