

Strategic Applications Manager

London Borough of Richmond upon Thames
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RECEIVED

15 MAY 2010

PLANNING

Dear Sirs,

STAG BREWERY DEVELOPMENT

Applications 18/0547/FUL Hybrid Application -Whole Site
18/0548/FUL School
18/0549/FUL Chalkers Corner

I write in response to the three planning applications noted above in relation to the proposed development of the Stag Brewery site in Mortlake.

I have previously attended several meetings with the applicants and their design team, and have also attended CLG Meetings and the Public Exhibitions, and despite all of this it is clear from the content of the proposals and the application documentation that both my own concerns and those of the wider community have been ignored. My comments and my objections to the proposals can be summarised as follows:

Vision and Heart of Mortlake

- The overarching vision for the redevelopment of the site is to put the heart back into Mortlake and add and enhance the "Village" context promoted by the Council, and enshrined in the Adopted Planning Brief. The proposed development with almost 900 residential units, a very large secondary school and almost 12,000 sq.m of mixed commercial uses is simply gross-overdevelopment of the site.
- The net result of the cumulative density combined with the style of the architectural expression of the new buildings shown in detail on the eastern half of the site, and shown in the Design Codes for the western half of the site, creates an URBAN development in a predominantly SUB-URBAN context.
- The site is bounded by Conservation Areas, MOL, the unique riverside setting which in parts is almost rural in character, and a local street pattern which is truly sub-urban in nature and character. The proposals are in direct conflict with the local context, and with specific aspects of the Adopted Planning Brief for the site.
- Although the Maltings and the former Hotel/Bottling Buildings are retained, as planned they miss the opportunity to activate the development and bringing back 'heart' to the community. The GF space in the Maltings makes so little of the relationship to the riverside, towpath or Plaza, and creates very poor internal space for community use. The retained facades to the Hotel/Bottling Building do not exploit the relationship to Mortlake High Street and certainly do not animate and enliven the streetscape.
- Although a Green Link is created from Mortlake Green to the riverside, this 'focus space' is then confused in concept by the introduction of Thames Street and the flexible space at GF level along its whole length, combined with further flexible space on the riverside frontage. I feel it preferable to concentrate GF active spaces to focus on the Green Link and create a 'heart' to the scheme and also animate sections of the frontage to Mortlake High St. As proposed the public realm/GF commercial uses are too dissipated and only so much will be commercially viable even with an increased local population. Indeed some commercial units on Sheen Lane and the Upper Richmond Road in Sheen struggle to succeed.



- The Planning Brief included a primary school. A secondary school is now proposed but involves the loss of valuable and protected open space and is shoe-horned onto the western part of the site. It should be perfectly feasible to accommodate a high quality school to meet local needs on over 21 acres and still create an exemplar mixed use sustainable development.

Design and Quality

- The Community Consultations in 2008-10 concluded that a low density, high quality scheme was most appropriate for the site and a design incorporating 390 residential units was widely supported. This approach was then embodied in the Planning brief the following year. Height constraints were also included in Appendix 1 of the Brief.
- The proposals for the site are 230% higher than that approach (ie: 390 units v almost 900) and densities are very significantly higher than the surrounding sub-urban context.
- This level of density is particularly demonstrated on the eastern half of the site and in the north west part of the western half of the site.
- Consequently the buildings are very compacted in form which one can very clearly see on the display models. This leads to little space between buildings and individual units which is unacceptable in what should be an exemplar scheme. The width to height ratio in the layout in many locations creates canyon-like spaces many of which will be in either permanent or protracted periods of shadow. These features of the design and layout contravene the Planning Brief, London Plan Guidelines and quality standards for residential accommodation.
- The heights of some blocks exceed the Planning Brief particularly on the riverside, in the north west.
- As a result of raising the GF level to a 'podium' to deal with flooding so the overall height of buildings is raised in relation to the original datum. Consequently the height of the blocks on the riverside dominate the towpath and riparian environment. This also serves to dominate the Maltings building when experienced from key views on Chiswick Bridge, the opposite bank of the river, Barnes Bridge and the river itself. (see 5.30 /5.31 of the Planning Brief).
- The terraced housing in the north west creates a rather relentless form and some units are very close to adjoining properties on Thamesbank. Some relief and articulation could create more visual interest and be more in character with the diversity of local context.

School

- The school seems to follow a formulaic design and creates a large monolith even bigger than some of the former brewery buildings. Many new schools over the country have won design awards despite rigorous budget constraints. This scheme is dreary and hardly inspiring of academic excellence.
- The proposed siting is now to the east of this half of the site but sadly involves a proposed loss of the protected open sports fields. The size, quality, and openness of the new landscape spaces in the scheme are in no way comparable or could be interpreted as re-provision.
- Is it not feasible to provide sports facilities for the school on 21 acres without loss of the existing grass pitches thus providing a wider range of activities rather than sub-optimal results as proposed?
- The floodlighting will create extensive light pollution to local residents to the north, west and south.
- The existing sports fields represent one of the largest open spaces in Mortlake. The loss of the pitches and potential for cricket is unacceptable, especially when Richmond and Wandsworth have such amazing sports facilities available close by at Barn Elms and where a new Sports Hall is in the pipeline to extend those facilities. The driver for a 'standard school' brief seems to defy an holistic and strategic approach to educational provisions.
- There appear to be no proposals to address safety risks at the Mortlake level crossings and Network Rail's declared concerns.
- There is no evidence of any planned improvements to public transport or strategic links of existing services to deal with both the school and the residential/commercial uses proposed in the applications.



Chalker's Corner

The proposals at Chalkers Corner give little regards to the residents on the Lower Richmond Road nor Chertsey Court. The 'mitigation' measures proposed are totally inadequate to deal with the movement of traffic and pollution closer to residents. The loss of existing mature trees and OOLTI protected open space is likewise a blatant disregard of the local community. The scheme will serve to attract more traffic and is a totally unacceptable proposal and should be rejected by the Authority. I object to this application in the strongest possible terms.

Traffic and Congestion

The local road network is already severely congested and the River, combined with the level crossings create a unique, local physical constraint to vehicular movement. The introduction of traffic from almost 900 homes, the school and the commercial uses, together with visitors and deliveries will simply bring the area to a halt.

The cumulative density of these proposals and the resultant traffic impact is certainly one of the most disturbing concerns of these applications.

Technical studies carried out by local community groups have indicated that works at Chalkers Corner will not solve this situation, but conversely could well attract further movements.

Residents attempting to enter or turn off Mortlake High Street or the Lower Richmond Road will be regularly frustrated by congestion on those roads making living in the area quite intolerable. Studies have assessed the normal peak times but because of the unique setting (river and four level crossings over several miles), congestion already exists at other non-peak times. As a local resident one experiences regular traffic congestion late morning, lunch-time, and frequently on Saturdays and Sundays. Twickenham events and Hammersmith Bridge restrictions/closures severely exacerbate this conditions. Such existing conditions hamper the 209 and 419 bus services.

I note a new bus-turnaround space is 'safe-guarded' on the site of the existing sports fields. This is unacceptable on OOLTI protected space. Indeed rather than a turn-around the Council and TfL should consider extension of the 209 to link with other local bus services especially with the predicted school catchment area.

Instead of spending £7.0m (a figure tabled by the applicant's engineers), on Chalkers Corner might it not be wiser to vastly improve public transport in the area, and seek the Mayor's financial support to a new river service between a Mortlake Pier and the transport hub of Hammersmith. This would be a visionary approach by the Mayor comparable to the Cycle Superhighways.

Safety at the Mortlake level crossing is a very major concern. Surveys have already revealed significant risks to the public and increased traffic proposed with the development will only serve to further increase those risks. The addition of 1200 pupils will vastly increase those risks still further.

In summary I am very supportive of re-development of this site but I object to the three applications in their current form and composition/quantum of uses. I urge the Council to reject the applications and re-commence discussions with the applicant to come forward with a more sustainable scheme which we can all support, and which creates a genuine exemplar environment for today's and next generations.

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