

West London River Group  
44 Leyborne Park, TW9 3HA



**Former Stag Brewery Mortlake Ref: 22/0900/OUT**

**Ref: 18/0547/FUL**

The West London River Group's (WLRG) members' are riparian amenity societies and other community groups whose areas of interest are in or near the River Thames between Kew and Chelsea.

The redevelopment of the Brewery site presents a great opportunity to re-establish a focal point in Mortlake and an opportunity to create a vista through to the River Thames. However, the WLRG have a number of concerns and objections about the impact of the development on the River and the TowPath which is part of the Thames Path. These concerns have been raised in previous planning applications made in respect of the Stag Brewery. Many of the concerns in relation to previous applications still pertain especially in the light of climate and other changes that have taken place since the first application was made. The application has finally been to a Design Review Panel for the first time and the Panel indicated that the masterplan now feels slightly outdated and needs to follow the standards set through the London Plan and other planning guidelines.

We wish to object to the planning applications related to the above site on the following grounds:

1. Towpath. The River and the Towpath is effectively a public realm amenity. The proposed plans for the Stag Brewery continue to embrace the Towpath as part of the development. It is not. 2.3 of the Lighting Plan for the proposed development states '....The towpath is included within the planning application boundary'. The Towpath is not part of the planning application except where access is needed. This 'mistake' has repeatedly been brought to the attention of LBRuT who have failed to rectify this misconception.

The Towpath's unique characteristic is rural, not urban, and this has not been clearly understood by the developers. This has led to a range of inappropriate developments being suggested of which the Lighting Plan and Landscaping are but two. The 'grand steps' and Riverside Terrace would overhang and encroach over a narrow section of the wooded Towpath and intrude upon the quiet that it currently provides for so many.

From Hammersmith to Richmond the Thames Path on the south side is wooded with trees on both sides of the Towpath, including the section that runs alongside the development. It is known as the Wooded Towpath. From between Mortlake and Kew the River opens into the Arcadian Thames and is renowned for its riverscape. It is a well used, appreciated public amenity used by a wide variety of users not just those from local communities. Other developments on this section of the River (see Kew Riverside development) have been mindful of the impact their developments will have on such a valued public amenity. The current proposals in terms of height of buildings, density and light pollution would totally overshadow and impact adversely on the Towpath. The quality of water management and its impact on the River has also to be resolved.

2. The revised plans are unsustainable in their scale, density and height representing an increase to 1085 units. Although there has been some lowering in height in relation to the planned town houses. The limit for heights of building near the river and Towpath continue to exceed height and density guidelines for new developments as identified in the National Planning Policy Framework, the London Plan and Richmond Council's Local Plan. "The proposal, by reason of its height, scale, bulk and massing, would result in an unduly obtrusive and discordant form of development in this arcadian setting which would be harmful to the townscape, character and appearance of the surrounding area." (See Mayor of London's Refusal of Planning Permission , GLA July, 2021). The current application does little to rectify this.

3. Traffic. The proposed changes would have an even greater impact ... "on highway safety and the cumulative impact on the road network would be severe." (NPPF Promoting Sustainable Transport Section 9 paragraph 109). The development does not take into account the substantial developments that are taking place in Brentford or in Kew and the impact that this has had on the South Circular resulting in long delays, congestion points and increased levels of pollution. The absence of a functioning Hammersmith Bridge has exacerbated an already overcrowded road system and impacts on the daily lives of many within South West London. While both the Council and the Mayor are arguing that drivers should transfer to public transport or bicycles where possible, the Lower Richmond Road and Upper Richmond Road carry orbital traffic, for which public transport alternatives are limited, and that the orbital traffic is now being increased by development within its corridor and also in its offshoot, namely the Brentford-Heathrow corridor. In terms of public transport, Mortlake Station is close to the site and its services continue as before, while bus services are getting ever slower due to the increasing levels of congestion and the closure of Hammersmith Bridge. We still have yet to see any real public transport improvement benefits associated with this planning application.

4. Air Quality. Policy SI 1 of The London Plan, improving Air Quality states the need for any development not to lead to a further deterioration of existing poor air quality. The development, by reason of, its location within an Air Quality Management Area and Air Quality Focus Area; the proposed alterations and increase to the size of the road network; the subsequent reduction in width of the public realm; and the absence of acceptable mitigation to protect the users of the pedestrian network; would result in a poor walking environment and increase the risk of exposure to poor air quality in an area that already suffers from high levels of pollution. The development is thereby contrary to Local Plan policies, the London Plan and the National Planning Policy.

5. Daylight Sunlight, Overshadowing and Light Pollution. The WLRG is concerned that the height and proximity of the buildings within the development in relation to the river and certain areas of the towpath will have an overshadowing impact on the environment and its habitat. The land slopes down to the river and as such the impact of the buildings height is magnified. The height and proximity of buildings to the towpath would increase the level of light spill.

The area in which the development is to take place is identified as falling under Zone E3 - Small town centres or urban location. However the proposed increase in the scale and density of the site makes Zone 2 a more appropriate category. This is a rural and dark section of the river and Sky Glow, Light Trespass and Building Luminance will have an impact not only on bats, see Ecology EIA Report for further details, but the River environment, neighbouring houses and the local community. The Upward Light Ratio would also be substantially increased.

## 6. Drainage §including Sustainable Drainage Systems.

Consideration needs to be given to surface water being the greatest short term flood risk. The proposed drainage systems including SUDS do not highlight the improved gains that a SUDS approach will bring especially in respect of biodiversity. Also it is not easy to see the integration of below and above surface drainage proposals, e.g. rain walls, green roofs, detention basins. The drainage report states that surface water will drain, through gravity directly into the River. There is no mention of potential pollutants that this will carry into the River. Equally if the site is to be built there is no mention of how surface water is to be carried away during any potential building. Greater, accessible clarification is needed in this area of the development.

The proportion of hard landscaping to soft needs rectifying and the hard surfaces in key places need to be porous to absorb heavy rainfall. Climate change and the risks associated with surface flooding have advanced since the original data was obtained for the first application.

### **Application: 18/0547/FUL Secondary School**

1. We have concerns about the building of a secondary school and its size when a local Primary School would benefit from being re-sited without the adverse environmental impact a secondary school would bring. In addition,

- a secondary school of such size being located alongside a highly congested road with poor accessibility for students arriving by bus along this road and on bicycle via the Sheen Lane level crossing or by using the TowPath
- the replacement of grass playing fields with an all-weather surface fenced in and floodlit, which is in contravention of the quality, character and openness of this Other Open Land of Townscape Importance (OOLTI).

I would ask that these applications are refused as the adverse impacts of such a development outweighs its benefits and ask for schemes which look to create additional housing, including affordable housing, a local primary school which is reflective of the needs of the local community, its environment and those who will live there.

Avril Dalglish  
Joint Chair  
West London River Group.