

BRIEFING NOTE



PREPARED BY

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SITE

Stag Brewery, Mortlake

PURPOSE

Response to consultation comments made by LBRUT & GLA

DATE

9th August 2022

1. Montagu Evans has been instructed by Dartmouth Capital to provide heritage and townscape advice pertaining to the submitted proposals at the Former Stag Brewery, Mortlake. As part of our scope, we have prepared this note to offer observations on the comments made in a consultation response by the London Borough of Richmond upon Thames ('LBRUT') (dated 27 May 2022) and the GLA Stage 1 Report (dated 20 June 2022, ref: GLA/2022/0288/S1/01) regarding the effect of the proposals on heritage assets.
2. The comments are made in regard to proposals submitted for the redevelopment of the former Stag Brewery site at Lower Richmond Road, Mortlake, SW14 7ET ('the Site'). Two linked applications for planning permission for the comprehensive redevelopment of the Site were submitted on the 11th March 2022, and are undergoing consultation at time of writing (LPA Refs: 22/0900/OUT and 22/0902/FUL).

LONDON BOROUGH OF RICHMOND UPON THAMES (LBRUT)

3. This response addresses four specific comments made by the LBRuT with regard to heritage harm.
4. For completeness we cite the four topics below.
 - A. **SETTING OF THE MALTINGS AND THE CHARACTER AND SIGNIFICANCE OF THIS PART OF MORTLAKE CA33 AS THE SKYLINE WILL CHANGE AND THE NEW BUILDINGS WILL APPEAR MORE DOMINANT BEHIND THE BTM**
5. In terms of the setting effect referred to in this comment, we believe this applies to the view of the development behind the Maltings in views from the opposite bank and Chiswick Bridge, oriented north-west.
6. This comment and our response should be considered in relation to TVIA views 4, 5, 6 and 7, which show the change to the setting of the Maltings, and to the character and appearance of the CA form points along the river. For ease, we have included these at **Appendix 1.0**.
7. The blocks at issue are blocks 2 and 7 (8 storeys with a 9 storey turret) and 8 (9 storeys on the river side).
8. We start by making a few preliminary points; first, for clarification, change to skyline in itself does not lead to harm; and with regard to this particular site, there is an allocation¹ for its redevelopment which requires a change to the skyline. Through the allocation, the Development Plan anticipates a significant change which also necessarily affects the setting of the Maltings and of the Conservation Area. While SA 24 and its supporting text do not address building heights specifically, the equivalent blocks in the Stag Brewery Planning Brief (2011) are at 4-5 storeys.

¹ LBRuT Local Plan SA24

Character of the Maltings building

9. The Maltings building has a robust character derived from its industrial purpose, with a distinctive appearance and bulk. As such its skyline profile is not, in our view, an integral part of its architectural interest. The building is particularly prominent in View 4, because one sees two sides of it, and from this position, the viewer would clearly perceive the gap to the upstream side and appreciate very clearly its eastern edge on that side. The open space has a separating distance of 52.7 to Block 7, and the depth of this space is understood in the view.
10. In views 6 and 7, the public square is particularly effective at exposing the side elevation and creates a visual interval, on a different alignment, so that the building retains its prominence in this view where its skyline is more distinctive.
11. The viewer would appreciate it therefore as a distinctive, three dimensional object which forms a very strong feature by the river, with a palette which contrasts with the rest of the development, and enhances its distinctive character. The perceived monumental form is accentuated by the abrupt change in scale from the two storey Ship Public House to the circa six storey face of the Maltings adjacent. The relative scale difference between the public house and adjacent houses emphasises the monumentality, which gives it an added presence.
12. Whilst there are some features that are apparent above the ridgeline, they are set at a different angle (broadly 90 degrees) and the longer, larger roof of Block 2 to the rear of the site, is set 67-80m behind that. The viewer's perception in three dimensions would ensure that the appreciation of the building would not, in practice, be undermined.
13. We don't agree that the Maltings will be dominated by the surrounding development; rather we think it will be clearly legible as a distinctive piece of industrial architecture, which by reason of its character will be differentiated from surrounding development.
14. If there is harm, it is quite limited, and the local setting of the Maltings is materially improved, and its given a beneficial use.
15. In view 5 the Maltings will retain its identity and prominence because the skyline change is set well back from the frontage, and perceived in the context of the well-proportioned public space.
16. If, however, a different view is formed, it is relevant that the building is not statutorily listed. It is in the Conservation Area, and is therefore subject to Section 72 of the 1990 Act.

B) THE HEIGHT OF THE PROPOSED BLOCKS, WILL RESULT IN SOME HARM TO THE SETTING OF THE LISTED BUILDINGS AND THE BTMS WITHIN THE CA ON THAMES BANK, AND ON THE SIGNIFICANCE OF CA33 WHEN SEEN FROM VIEWPOINTS ON THE RIVER, OPPOSITE BANK AND CHISWICK BRIDGE.

17. Presently, the existing brewery buildings create a harsh and unrelieved backdrop, lacking any scale references and having an industrial character. They are to be replaced with buildings that have a more sympathetic, residential character, and a varied form, with skyline gaps.
18. We consider those components of the development to represent an enhancement, or at least, no worse than what is there.
19. Blocks 16, 17 and 18 do represent a materially changed setting, which does cause a harm to the Conservation Area.
20. The skylining of the CA to the south-west principally affects the vegetated character, which is the product of a mature tree canopy, with traditionally designed modern developments glimpsed through it.
21. We agree this causes a degree of less than substantial harm to the Conservation Area, and in calibrating the harm we have regard to the following considerations; first it is not a direct impact but one of setting; second, it affects only part of

the CA; and third, the separating distance between the new built form and the viewer is a factor in the experience of this part of the CA's setting.

22. As a consequence, we identify a low order of LTS harm. This harm is capable of amelioration at reserved matters stage by adherence to the principles set out in the reserved matters stage. This harm is to be set out in the Section 72 balance against benefits to CA, which are considerable. The built heritage ES Chapter prepared by Waterman finds the overall effect to be Minor Beneficial.

C) BOUNDARY/PERIMETER WALLS TO EASTERN SECTION OF SITE - THERE WILL BE SOME HARM CAUSED BY THE REMOVAL OF BOUNDARY WALLS AND REMAINS OF BUILDINGS ALONG MORTLAKE HIGH STREET, AND THEREFORE TO THE SIGNIFICANCE OF THIS PART OF MORTLAKE CA33 DUE TO THE LOSS OF HISTORIC FABRIC WHICH IS OF BOTH HISTORICAL AND ARCHITECTURAL INTEREST.

23. We agree that the removal of the wall results in a degree of less than substantial harm – it is acknowledged that these existing walls have historic interest because of their age and the evidence they represent for the former industrial use of the site. They are of completely typical construction.

24. Notwithstanding, they are altered and unsympathetically extended in parts, and the older brewery buildings they relate to don't survive so they have lost a functional context. As a consequence, notwithstanding their historic interest, the walls have a harsh townscape character and create an unwelcoming environment, undermining the enjoyment of the CA.

25. The delivery of the site allocation would necessarily require the removal of these anyway, because they are not conducive to the development of a modern residential-led mixed use development. As a consequence, any harm to the CA is a low order of less than substantial. The compensating benefit would be the delivery of a high quality scheme enhancing the CA.

D) BUILDING 10 UNBALANCED AND OVERSCALED, IMPACTING UPON ADJOINING BTMS AND CONSERVATION AREA.

26. Building 10 has a strong vertical rhythm, drawn from the windows, taken with the regular storey bands, which come together to form a well-articulated and modelled façade.

27. In views from the east (see View 8), this would be approached in the context of a roofscape of no particular quality, with a set-back upper storey in contrasting lighter materials.

28. Notwithstanding the change in scale, we think the character, materials and the detailed design will ensure an acceptable and appropriate relationship and will not dominate the scene.

29. Moving further west along Mortlake High Street, this part of the Site presents a very harsh boundary, and so the new building would be an improvement through the provision of a new active frontage and street vitality.

30. Particularly within this local context, there is some variety and richness to the elevation through materials, detailed design, and introduction of certain points of activity.

31. Overall, and taking all of this into account, we conclude that there is no harmful setting effect on the buildings of townscape merit or, on balance, the Conservation Area.

GLA

32. This section responds to comments made by the GLA in the Stage 1 response.

33. Heritage considerations are addressed at paragraphs 75-78 of the GLA response. Some of these replicate comments made by the Council, and relate to the proposals' effect on the setting of the Maltings Building and Mortlake Conservation Area, both of which are considered above.
34. We note that paragraph 75 does not differentiate between harm caused to the Conservation Areas (Mortlake and Mortlake Green) and listed buildings along the Thames Bank, which are designated heritage assets, and the three Buildings of Townscape Merit within the site (the Maltings, Bottling Building and Hotel).
35. For the avoidance of doubt, and as a matter of procedure, we assume that the less than substantial harm referred to in paragraph 77 (and the considerable importance and weight attached to any harm) is applied by the GLA only to the Conservation Areas and grade II listed buildings (the designated heritage assets). The effect of proposals upon non-designated heritage assets requires a 'balanced judgment', having regard to the scale of any harm or loss, and the significance of the asset (paragraph 203, NPPF).
36. We turn first to the effect on the Conservation Areas.

WHILST THE REDISTRIBUTED MASSING OF THE SCHEME HAS REDUCED THE IMPACT ON THE SETTING OF A NUMBER OF THE HERITAGE ASSETS IN KEY VIEWS FROM THE RIVER, GLA OFFICERS CONSIDER THAT THE APPLICATION WOULD STILL RESULT IN LESS THAN SUBSTANTIAL HARM TO THE SIGNIFICANCE OF HERITAGE ASSETS AS A RESULT OF THE FOLLOWING IMPACTS:

HARM TO THE SIGNIFICANCE OF THE MORTLAKE CONSERVATION AREA OWING TO IMPACT ON SETTING FROM HEIGHT AND MASSING AND TO THE SETTING OF THE MALTINGS BUILDING WHEN VIEWED FROM CHISWICK BRIDGE AND CHISWICK BANK

37. This point is addressed above at paragraphs 5-16.

HARM TO THE SIGNIFICANCE OF THE GRADE II LISTED RESIDENTIAL PROPERTIES SITUATED ON THAMES BANK BETWEEN SHIP LANE AND CHISWICK BRIDGE, INCLUDING THAMES COTTAGE, TUDOR LODGE, THAMES BANK HOUSE, LEYDON HOUSE AND RIVERSIDE HOUSE OWING TO IMPACT ON SETTING FROM THE PROPOSED HEIGHT AND MASSING OF THE SCHEME.

38. This is addressed at paragraphs 17 – 22 above.

- **LOSS OF SOME HISTORIC FABRIC IN THE MALTINGS BUILDING RESULTING FROM WORKS NECESSARY FOR ITS ADAPTATION FROM INDUSTRIAL TO COMMUNITY AND RESIDENTIAL USES;**
- **LOSS OF SOME HISTORIC BUILDING FABRIC IN THE FORMER HOTEL AND FORMER BOTTLING PLANT;**
- **DEMOLITION OF THE MAJORITY OF FORMER BRICK BOUNDARY WALLS;**

39. Turning now to non-designated heritage assets, the GLA identifies a degree of harm arising from the loss of historic fabric in the Maltings, Former Hotel and Former Bottling Plant buildings.
40. As noted above, these buildings are non-designated heritage assets (Buildings of Townscape Merit). Their principal significance lies in their external expression, which contributes to their surroundings as evidence of the historic development of the brewery complex, and to local distinctiveness as part of a varied townscape.
41. Whilst the conversion leads to the loss of some fabric, this is necessary to enable the buildings' adaptation for a new, long term use – which we note that the GLA also identifies as beneficial. Paragraph 76 also identifies the restoration of the buildings' most significant façades, the return of the original use to the hotel building, and the restoration of other features of heritage value within the site.

42. The effect on the brick walls is considered above at paragraphs 23-25 above.

IN ACCORDANCE WITH THE NPPF, INCIDENCES OF ‘LESS THAN SUBSTANTIAL HARM’ SHOULD BE WEIGHED AGAINST THE PUBLIC BENEFITS OF THE PROPOSAL, INCLUDING HERITAGE RELATED PUBLIC BENEFITS. CONSIDERABLE WEIGHT AND IMPORTANCE MUST BE ATTACHED TO THE HARM CAUSED BY THE PROPOSALS TO SURROUNDING HERITAGE ASSETS IN ANY BALANCING EXERCISE. AS THE APPLICATION WOULD HARM HERITAGE ASSETS, THE PROPOSALS CONFLICT WITH LONDON PLAN POLICY HC1

43. We agree that any harm to the significance of a designated heritage asset should require ‘clear and convincing justification’, as per paragraph 194 NPPF, and stands to be weighed against the public benefits (including heritage benefits) of the proposals as set out at paragraph 196 NPPF.
44. Policy HC1 says, at the end of limb C that ‘*development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*’ We do not interpret this to mean that any identification of harm means that a proposal is in conflict with the policy.
45. The proposals have been developed mindful of the significance of heritage assets both within and in the setting of the Site, and indeed the GLA response acknowledges that the ‘most significant’ façades of the Hotel and Bottling Plant are retained and restored (and that these works are beneficial).
46. With regard to the designated heritage assets, the NPPF allows for the balancing of harm against benefit (either as an internal heritage balance as described in Palmer, or with heritage benefits counted as public benefits). In either case, and on our reading of HC1, any harm caused by the proposals is capable of being outweighed by the benefits of the proposals.