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The Head of Development Management,  
Environment Directorate,  
London Borough of Richmond-upon-Thames Council,  
The Civic Centre, 44, York Street,  
Twickenham, Middlesex,  
T.W.1 3.B.Z.

For the attention of Ms Lucy Thatcher

13<sup>th</sup> January, 2023.

Dear Mr Angus/Ms Thatcher,

**PROPOSED DEVELOPMENT OF THE FORMER STAG BREWERY SITE AND THE ADJACENT WATNEY'S SPORTS GROUND, MORTLAKE HIGH STREET AND LOWER RICHMOND ROAD, MORTLAKE, LONDON, S.W.14. – APPLICATIONS A AND B, REFERENCES 22/0900/OUT AND 22/0902/FUL**

Thank you for your notification-letter of the 9<sup>th</sup> December drawing attention to the submission of amendments to the two, linked applications for Planning Permission relating to the comprehensive redevelopment of the former Stag Brewery Site and the adjacent Watney's Sports Ground (Hybrid Application A, reference 22/0900/OUT and Full Application B, reference 22/0902/FUL). I note that they represent amended proposals to those which the Council most unwisely and unjustifiably resolved to approve in January, 2020 (subject to the completion of a Section 106 agreement, no adverse direction from the GLA and no 'call-in' by the Secretary of State) – the subject of applications references 18/0547/FUL and 18/0548/FUL, the amended versions of which the Mayor resolved to refuse in July, 2021 (GLA reference GLA/4172 and GLA/4172a).

Whilst noting the submission of amendments and additional information to the proposals as submitted in March, I am writing to convey my formal objections to both applications on the basis that the proposals fail fundamentally to provide a sound and sustainable future for these important sites consistent with the relevant national, London-wide and local planning policies contained in the *National Planning Policy Framework* of July, 2021, the *London Plan* of March, 2021 and the *Richmond-upon-Thames Local Plan* of July, 2018.

In submitting these objections, I confirm my support for key aspects of the representations submitted at an earlier stage by The Barnes Community Association (on 10<sup>th</sup> May), The Kew Society (on the 29<sup>th</sup> May), The Mortlake Community Association (on the 29<sup>th</sup> May), The

Mortlake with East Sheen Society (on the 31<sup>st</sup> May) and The Mortlake Brewery Community Group on the 31<sup>st</sup> May), and, more recently, by the Mortlake Brewery Community Group, in response to the latest proposals.

#### MY EARLIER CONCERNS

In my earlier submissions to the Council on the original applications of the 9<sup>th</sup> May, 2018 and 17<sup>th</sup> August, 2019 and to the GLA of the 22<sup>nd</sup> September, 2020 and the 30<sup>th</sup> October, 2020, I focussed on the excessive quantum of development proposed across both the development area to the east of Ship Lane and the development area to the west of the Ship Lane and by the excessive heights of residential development proposed on key parts of the respective areas, and suggested that together with the proposed development of a secondary school on the Watney's Sports Ground site, these will lead to a wholly unacceptable increase in traffic movement and traffic congestion and in the demand for on-street car-parking in the heart of Mortlake, specifically around Mortlake Green, along Mortlake High Street, along Sheen Lane (to both north and south of the level-crossing), along that part of the Lower Richmond Road between Chalker's Corner and Sheen Lane/Mortlake Green, along The Terrace (both west and east of Barnes Railway Bridge), along White Hart Lane (to both north and south of the level crossing) and in nearby residential streets – all to the substantial detriment of the amenity of local and other Borough residents and local businesses and to the detriment of the character, appearance and significance of the Mortlake and Mortlake Green Conservation Areas and their settings and on the settings of nearby historic buildings – both listed and unlisted.

#### MY CONCERNS ABOUT THE CURRENT PROPOSALS

In reviewing the latest proposals, my serious concerns about the massive overdevelopment of the respective sites (Applications A and B); about the excessive density and heights of development on the sites to east and west of Ship Lane (Development Areas 1 and 2) and their potentially damaging impacts on the character of this part of Mortlake; the entirely unjustified loss of the Watney's Sports Ground as an open, green space; and the absence of adequate mitigating measures, let alone, any substantial public transport benefits linked to the proposed development, remain unresolved.

#### THE SCALE OF THE PROPOSALS

The proposed development of residential buildings rising to 6, 7, 8 and 9 storeys across Development Area 1 and rising to 6, 7 and 8 storeys across Development Area 2 is entirely in conflict with the prevailing scale of residential development in the immediate area of the application sites – both within and outside the Mortlake and Mortlake Green Conservation Areas – which comprises 19<sup>th</sup> century, 2 and 3-storey houses and 20<sup>th</sup> century mansion blocks and blocks of flats generally rising to no more than 4 storeys in height (*Cowley Mansions, Ripley House, Ashleigh House, Avondale House, Montgomery House, Kindell House, John Dee House, Craven House* and *Rann House* and other, more recent developments along Mortlake

High Street, such as *Tideway Wharf* – the only exceptions being *Elm Bank Mansions* and *River House* on The Terrace, which rise to 5 storeys in height (with an additional, but well set-back storey on the latter) and parts of *Chertsey Court* fronting the Lower Mortlake Road and Clifford Avenue, which rise to 5 storeys in height. Significant to the context too, is the fact that buildings of key townscape value and local historic interest such as *The White Hart*, PH, the grade II\* listed *Church of St Mary-the-Virgin and its Vestry House*, *The Ship*, PH, *The Jolly Gardeners*, PH, and *The Tapestry* (formerly *The Jolly Milkman*, PH) only rise to a maximum of 3 and 4 storeys in height.

Whilst noting the suggestion made in the Council's own *Supplementary Planning Document - Planning Brief for the Stag Brewery Site* of July, 2011 that residential development of up to 6 and 7 storeys would be acceptable across the greater part of the sites east and west of Ship Lane, it is quite clear from the submitted elevations and sections and other illustrative material that the proposed development of residential buildings rising to 6, 7, 8 and 9 storeys across Development Area 1 and rising to 6, 7 and 8 storeys across Development Area 2 would have a seriously damaging impact on the character, appearance and significance of the Mortlake and Mortlake Green Conservation Areas and their settings; on the settings of nearby historic buildings – both listed and unlisted; and, importantly, on this significant stretch of the Thames. The presence of the anomalously tall *Maltings Building* of 1902 on the riverside at the northern end of Ship Lane, which rises to 8 (and, in limited part, to 9) diminutive (undersized) storeys does not justify perpetuating similar or greater heights of new buildings across the two sites.

#### THE PROPOSALS ASSESSED AGAINST THE RELEVANT LOCAL, LONDON-WIDE AND NATIONAL PLANNING POLICIES

In urban design and conservation terms, the submitted proposals run contrary to many relevant, local, London-wide and national planning policies.

Assessed against the relevant policies contained in the *Richmond-upon-Thames Local Plan* of July, 2018, the proposals would:

- Fail to respect, contribute to and enhance the local environment and character, failing to establish compatibility with local character including the relationship to existing townscape, development patterns, views, local grain, scale, height, massing and density contrary to Policy LP1;
- Fail to respect and strengthen the setting of the Borough's valued townscape and landscape through appropriate building heights by failing to reflect the prevailing buildings heights within the vicinity, failing to preserve the settings of the Borough's heritage assets, failing to respect local context or to enhance the character of the area through appropriate scale height, urban pattern contrary to Policy LP2 and the ninth bullet-point of Site Allocation SA 24;
- Fail to give great weight to the potential impact on the significance of the two conservation areas as heritage assets, and fail to preserve or enhance the character or

appearance of the two conservation areas, contrary to Policy LP3 and the ninth bullet-point of Site Allocation SA 24;

- Fail to preserve or enhance the settings of buildings of townscape merit as non-designated heritage assets, contrary to Policy LP4;
- Fail to preserve the quality of views, vistas, gaps and the skyline – particularly as seen from across and along the river – which contribute significantly to the character, distinctiveness and quality of the local and wider area, contrary to Policy LP5;
- Fail to preserve the integrity of the Watney’s Sports Ground as ‘a green space’ forming part of ‘the wider green infrastructure network’, contrary to Policy LP12;
- Fail to preserve the Watney’s Sports Ground as a potential ‘local green space’ special to the local community and holding particular local significance for that community, contrary to Policy LP13.D;
- Fail to protect or enhance the Watney’s Sports Ground in open use as designated ‘Other Open Land of Townscape Importance’, contrary to Policy LP14 and the twelfth bullet-point of Site Allocation SA 24;
- Fail to protect or enhance the entirety of the Watney’s Sports Ground for recreational sports use contrary to Policy LP31;
- Fail to retain and the existing sports and recreational land and facilities on the entirety of the Watney’s Sports Ground contrary to Policy S5.C.; and
- Fail to adhere to key objectives set out in Site Allocation SA 24 – specifically the ninth and twelfth bullet-points.

Assessed against the relevant policies contained in the *London Plan* of March, 2021, the proposals would:

- Fail to retain the Watney’s Sports Ground without justification; without equivalent or better provision in terms of quantity and quality in a suitable location; and without the provision of alternative and recreational provision, the benefits of which clearly outweigh the loss of the current use, contrary to Policy S5.C.1), 2) and 3).
- Fail to preserve the Watney’s Sports Ground as a protected open space, contrary to Policy G4.1).
- Fail to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape , with due regard to existing and emerging street hierarchy, building types , forms and proportions, contrary to Policy D3.D.1).

- Fail to respond to the existing character of the area by identifying the special and valued features and characteristics that are unique to the locality, and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character of Mortlake, contrary to Policy D3.D.11).
- Fail to be of high quality, with architecture that pays attention to detail, contrary to Policy D3.D.12);
- Fail to reinforce the spatial hierarchy of the local and wider context or aid legibility and wayfinding, contrary to Policy D9.C.1).b);
- Fail to take account of, and avoid harm to, the significance of London's heritage assets and their settings, without clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm, and fail to positively contribute to the character of the area, contrary to Policy D9.C.1).d); and
- Fail to conserve the significance of affected heritage assets, and their settings, by failing to be sympathetic to the assets' significance and appreciation within their surroundings, contrary to Policy HC1.C.

Assessed against the relevant policies contained in the *National Planning Policy Framework* of July, 2021, the proposals would:

- Fail to have regard to the presumption against building upon existing open space, sports and recreational buildings and land, including playing fields contrary to Paragraph 99;
- Fail to take account of the desirability of maintain the area's prevailing character and setting (including residential gardens), contrary to Paragraph 124.d);
- Fail to take account of the importance of securing a well-designed, attractive and healthy places, contrary to Paragraph 124.e);
- Fail to add to the overall quality of the area, contrary to Paragraph 130.a);
- Fail to be visually attractive as a result of good architecture, layout and appropriate and effective landscaping contrary to Paragraph 130.b).;
- Fail to be sympathetic to local character and history, including the surrounding built environment and landscape setting, contrary to Paragraph 130.c);

- Fail to establish or maintain a strong sense of place, using the arrangement of spaces, building -types and materials to create an attractive, welcoming and distinctive place to live, work and visit, contrary to Paragraph 130.d);
- Fail to either sustain or enhance the significance of both designated heritage assets and non -designated heritage assets in the surrounding area, including the Mortlake and Mortlake Green Conservation Areas, and Locally Listed/Buildings of Townscape Merit (by causing potentially serious harm to their settings, thereby substantially harming their significance), contrary to Paragraph 197.a);
- Fail to make a positive contribution to local character and distinctiveness, contrary to Paragraph 197.c);
- Fail to provide clear and convincing justification for the potentially serious harm that will be caused to the settings of the Mortlake and Mortlake Green Conservation Areas, thereby substantially harming their significance as designated heritage assets, contrary to Paragraph 200;
- Fail to demonstrate that the potentially serious harm that will be caused to the settings of the nearby Mortlake and Mortlake Green Conservation Areas, thereby seriously harming their significance as designated heritage assets, will be balanced by relevant and adequate public benefits contrary to Paragraph 202;
- Fail to demonstrate that the potentially serious harm that will be caused to the significance of nearby non-designated heritage assets – both within and outside the two respective conservation areas is justified, contrary to Paragraph 203; and
- Fail to either enhance or better reveal the significance of nearby heritage assets – both designated and non-designated - contrary to Paragraph 206.

## CONCLUSION

On the basis of the above, I would urge the Council to refuse the current applications, or to defer their determination, pending substantial revisions to the proposals relating to both application sites that will secure the long overdue regeneration of this part of Mortlake in accordance with local, London-wide and national planning policies.

Finally, please will you let me know when the applications are due to be considered by the Planning Committee and the outcome of such consideration in due course.

Yours sincerely,

Paul Velluet.

Copies to Mortlake and Barnes Common Councillors Nikki Crookdake, Anton McNulty-Howard and Tony Paterson; Assembly Member for South-West London, Nick Rogers; and Sarah Olney, M.P.