

Guy Duckworth
Dartmouth Capital Advisors
Mon. 15.08.17

Dear Guy,

STAG BREWERY JULY EXHIBITION & LATEST DEVELOPMENT PROPOSALS

We write in formal response to the Exhibition scheme illustrated at the Brewery Sports Club in July. We had hoped to respond sooner with the benefit of certain data and floor areas which we had requested to enable us to assess some of the technical aspects of the latest scheme proposals. It seems from Soundings response on Friday 11.08.17. that this information will not be provided immediately so we respond based on the data and panels illustrated at the Exhibition.

We note that the scheme design has incorporated certain changes following the initial exhibition, some of which are positive but the principal concerns about the scheme remain, namely the cumulative effect of the density of the development and resultant design and traffic implications. We confirm our comments and observations on the latest proposals as follows:

1.0 Density

We note that the scheme now includes 856 residential units (730 homes and 126 assisted living units). The scheme also includes the 1200 pupil intake secondary school, offices, retail units, cafes/restaurants, cinema, gym, 20 bed hotel, health centre, community space, and rowing club unit. As we don't have the floor areas data which we have requested it is difficult to precisely assess the density against the GLA guidelines in the Housing SPG March 2016.

While we acknowledge that the residential unit numbers have reduced from 790 this is the result of two main factors:

- Previously the residential units to the west zone exceeded the height constraints set out in the Adopted Planning Brief; these have now been reduced in height to accord with the brief with a resultant reduction in unit numbers
- Previously your scheme included a 'tower' building. This contravened both the Adopted Planning Brief and Richmond Council's policy on tall buildings. The removal of this building has consequently contributed to the reduced unit numbers

The reduction in residential units is thus more to do with compliance with the Planning Brief and Local Authority policy rather than any recognition of local concerns about development density.

The level of cumulative density of development remains one of the primary concerns of the community given the target level of 560 residential units set by Richmond Council. However this target level was set when the density was based upon the inclusion of a primary school and not the larger land-take for a 1200 intake secondary school. Taking into account the reduced site area with the secondary school then the site density consequently increases, and as now proposed would be a 100% density increase from that originally envisaged by the Council.

We note that there is an increase in the intensity of development in the eastern zone of the site. This block of land is circa 7.32 acres with the repositioned Green Link now comprising around 1.0 acres. By our calculation there are just over 400 residential units illustrated in this zone. On this basis the density on the east zone is around 157 units/Ha which is well above the 135 units/Ha quoted verbally at the exhibition. This however does not take account of all the other land uses proposed which are concentrated

in this eastern zone, (cinema and gym, 20 bed Gastropub/Hotel, Offices, 40 retail units, cafes/restaurants, community uses and rowing club unit.

Considering these other land uses, as directed in the GLA guidelines, the overall residential site density could potentially get closer to 200 units/Ha which exceeds all guidance on housing density for this location. The scale model quite clearly demonstrates the excessive density in the form of the layout, massing and building heights.

Our letter of 28.06.17 sets out in some detail our concerns about the cumulative site density. Nothing in the latest proposals shown in the July exhibition alter the points highlighted in that letter. (copy attached for ease of reference)

2.0 Traffic and Congestion

We note that the proposed scheme now includes 764 car parking spaces and that you have indicated that the school alone will increase the am peak traffic flow by 50%.

The density of the scheme and the resultant site traffic flows and other traffic visiting the site is one of the main concerns of the local residents and business community.

The proposal to carry out works to Chalkers Corner to alleviate am and pm peak traffic flows will merely increase the volume of traffic attracted to and through the area leading to greater congestion. Again our letter of 28.06.17 sets out detailed points related to the proposed works at Chalkers Corner. (see attached copy). The latest refinements made to the junction layout do not address community concerns nor those of the residents in Chertsey Court. It appears that no one has approached those residents to explain the proposed junction works.

Clearly such junction alterations would be extremely costly and disruptive as they would need to be phased over quite a long period. Congestion during the works would be significant and wide-spread over the local area.

Suggestions from the community include re-directing the significant funds required for the junction works into alternative solutions - namely major improvements to public transport. Such improvements could include extension and increased frequency of the 209 and 419 bus services and extension of the 22 bus service to connect with the 209/285 services in Barnes, an initiative still being pursued by Barnes residents with TfL.

The exhibition was not explicit about any proposals to improve the Mortlake station level crossing. We expect a scheme of this magnitude would address this existing constraint and point of safety concerns to the whole community.

The exhibition illustrated a new access and ramp on Mortlake High Street close to Bulls Alley. The designs indicated an entry and exit point leading to a ramp to the basement parking. This aspect of the current proposals is an un-welcome change. One of the key aspects of the 'Vision' for the development is the improvement of the High Street and the introduction of active frontages and uses. It would be possible to more successfully locate the ramp access to the north of the building rather than off the High St, and link to the road access junction only a few meters to the east.

Even the recently completed small residential scheme opposite on the old Charlie Butler site has located its basement ramp to the rear in Mullins Path. We suggest this aspect of the scheme is revised.

3.0 Retention of Existing Sports Fields

The scheme still contravenes the Adopted Planning Brief and the OOLTI designation with regards to the existing sports fields as those policies call for the retention of the sports fields and envisage greater use by way of public access.

You have argued at the CLG meetings that the all-weather pitch will allow greater use of the space but this ignores the reasons for protecting this important green open space in Mortlake. The OOLTI designation does not exclusively relate to sports use. It recognises the Townscape Importance and visual amenity contribution this open space makes to the area and to local residents who enjoy the visual relationship to this space.

You will also be aware now of the Mayor's recent policy for the 'Greater London National Park City Initiative'. This champions greater protection of existing green open space.

The exhibition scheme continues to show two three storey residential units on this protected land. These contravene the Adopted Planning Brief and the OOLTI designation and Mayor's policy.

- If the secondary school is to be located on the western zone of the site we still maintain that the optimum siting is a north-south orientation as shown on the alternative plan we provided some months ago.
- This would create an oblique view of this very large building and it would be less visually obtrusive than the illustrated design on the east/west orientation
- It would also move it further away from residents in Williams Lane and Wadham Mews
- It would be located on the site of the existing sports pavilion building and where there is an existing very large brewery building which is much higher than the proposed school.
- It would allow the retention of existing trees to the north of the playing fields
- It would allow the retention of the existing grass sports fields and would also allow the creation of a public pocket park immediately alongside the Lower Richmond Road
- Our alternative siting would remove the need to have a link road north of the existing sports fields as currently shown on the exhibition scheme. This could be purely a pedestrian/cycle route.

We continue to advocate our alternative location for the secondary school if it is to be located on the brewery site. We object in the strongest possible terms to the current layout on the existing sports fields.

4.0 Green Link

The repositioning and re-alignment of the Green Link is the one major improvement to the proposals and is generally welcomed by the community. The previous designs included a new 'square' adjacent the hotel site and this created a confusion in the design as to where the heart of the scheme was located.

The new Green Link design forms a more defined 'Heart' to Mortlake and now responds to the Vision set out in the Planning Brief.

As mentioned previously in earlier communiques, and at the CLG meetings, we would suggest that ground floor active frontage uses are focused around the Link and Maltings and are not too dissipated. There will be a market limit to what will successfully operate in the scheme in terms of retail, cafes, bars, restaurants etc. We urge you to concentrate these at the heart of the development and the High Street.

A further suggestion is to avoid the road which crosses the Green Link. Emergency access and cycles crossing the Green Link would be acceptable but we propose no other vehicular access crossing the Link. If the water feature illustrated in the design is incorporated we would suggest this is better located closer to the east-west route, and thus further set back from the Lower Richmond Road.

A connection with Mortlake Green and the riverside is now much more positive. The design will require a new pedestrian link with the existing footpaths on Mortlake Green, and some localised opening up of the understory planting on the south verge of the Lower Richmond Road. It is clearly possible to achieve this physical and visual link whilst retaining all the mature elm trees on the roadside.

A pedestrian and cycle crossing here would also be a positive design feature.

A small improvement to the design would incorporate a set back of the ground floor of the building at the south east corner of the Green Link. This would create a less visually aggressive corner and a more inviting introduction into the Link from the north pavement line.

5.0 Bus Turn-Around 209 Route

We are pleased to see this component of the earlier designs has now been removed. We encourage you to explore public transport improvements as outlined earlier in Item 2.0.

6.0 Design and Building Heights

We welcome the reduced building heights in the north west area. One building is however now taken up to 8 storeys. This contravenes the Brief and should be reduced in height. We remain concerned that the eastern zone is very dense with narrow spaces between buildings and many of the open landscaped spaces are in shadow for large periods. This is made worse with taller buildings often to the south of many of these open spaces and thus accentuating the shadowing effect.

We remain concerned about spaces between buildings and heights especially towards the edges of the site and alongside the riverside. These do not accord with the objectives set in the Adopted Planning Brief. Your own scheme in Teddington has wider spaces between much lower and less dense development.

Many of the points raised in our previous letter 28.06.17 still apply and are mostly generated by the sheer density, particularly in the eastern zone of the development.

7.0 Mix of Uses

The scheme incorporates a good mix of uses and employment opportunities. The sheer scale of the school concerns many and will radically change the character of the area with the activity and movement of 1200 pupils and staff/parents.

We welcome the reduced size of the proposed hotel. Whether the cinema concept is commercially viable will remain to be seen. We have already covered our views on the retail uses and the preferred location for the heart and active frontage focus to the scheme.

One of the major factors to emerge during the CLG meetings and our own MBCG meetings relates to a well balanced residential component, including the 'affordable' element of the scheme.

We wish to see various forms of tenure including shared ownership and certainly wish to avoid the trend on so many other London residential schemes - namely 'lights out' un-occupied investment units. We will be urging the Council to avoid this trend which would suck the heart out of the development.

8.0 Community Uses/Space

We note the inclusion of a Health Centre, (10,000 sqft), in the west zone. Would this be better located in the heart of the scheme? Clearly input from the CCG and establishing local needs requires much further investigation by your team.

With regards to the Community space covered in the Adopted Planning Brief we requested a meeting with you to take this forward in more detail. You have asked to postpone those discussions. We have an emerging brief for local requirements which we would like to discuss with your team.

Previously you have verbally quoted that community space will be provided in double height space at the lower level of the Maltings. Your latest plans however show two staircase cores in the floor plate. This would completely compromise the available space at ground floor level.

Can we please arrange to meet to progress this specific aspect of the Detailed Planning Application proposals?

The secondary school remains of the same scale as shown at earlier CLG meetings. You had agreed to question whether the school could be reduced in intake/size and we await to hear the outcome of those discussions with Richmond Council and the EFA.

9.0 CLG Meetings

We note you have arranged another CLG meeting in September. We would ask that the agenda provides the majority of time for open debate about the proposed scheme and allows us to cover the points raised in this letter.

Previous sessions have involved too much time allocated to presentation by your consultants and extremely limited time for attendees to discuss key aspects of the development and their concerns. We look forward to your response to our comments and concerns and covering these when we meet in September at the CLG. We would of course be happy to meet before then if you wish.

Yours sincerely

Peter Eaton for and on behalf of MBCG

cc. Richmond Planning Dept. Paul Chadwick/Lucy Thatcher
Cllr. Paul Avon