

**THE FORMER STAG BREWERY
MORTLAKE
LONDON**

**PROOF OF EVIDENCE
MASTERPLAN & DESIGN**

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**APPEAL CASE REF - APPL/L5810/W/24/3339060
APPL/L5810/W/24/3339062**

**Town and Country Planning Act 1990 Appeal Under Section 78 (Inquiries Procedure)
(England) Rules 2000**



01.05.2024

1.0 Personal Introduction

My name is Peter John Joseph Eaton. I am a qualified architect with over 50 years experience in a wide field of architectural and masterplan projects. I was a director of architecture at Aukett Architects (1983-2018) who later merged with Fitzroy Robinson and most recently became Aukett Swanke, a large well respected commercial practice based in London but with studios throughout Europe and the Middle East.

Aukett Swanke is a multi-disciplinary practice of master planners, architects, interior designers, landscape architects, and at different periods also included planning consultants, services engineers and structural engineers.

My own professional experience has included large scale mixed use masterplans in the UK and continental Europe, projects for historic buildings, offices, residential, student accommodation, civic buildings and a mix of uses and projects for corporate land owners and local authorities.

I was lead director of the new mixed use campus for Imperial College at Wood Lane in north Hammersmith and several of my projects have won Civic Trust Awards, national and regional design awards. These include The Royals in London Docklands opposite City Airport, South Cambridgeshire District Council's HQ at Cambourne, Cambridge, the Bradfield Centre in Cambridge and projects for National Air Traffic Services and Napp Pharmaceuticals.

I am now retired from full time employment but continue as a consultant architect, am registered with ARB and hold retired status as a member of the RIBA.

I am also a Fellow of the Royal Institute of Architects of Ireland and Fellow of the Royal Geographical Society with IBG.

I was for many years until 2022 a member of the Hammersmith & Fulham Design Review Panel where we reviewed many schemes of the scale and nature similar to the Stag Brewery proposals.

I am a resident of Mortlake and when it was announced that the Stag Brewery was to close I became involved in public consultations held by Richmond Council to explore residents' views on the site's redevelopment.

I assisted members of Richmond's Planning Policy team, helping Philip Wealthy, senior officer at Richmond, to write the draft Brief for the Stag site, which in July 2011 was formally Adopted by the Council as the Planning Brief. (CDE.2). I have since helped form the Mortlake Brewery Community Group (MBCG), whose purpose is to see the site is "developed as an exemplar community for the 21st century" and which "puts the heart back into Mortlake".

I became co-chair of the MBCG in 2021.

Those parts of this proof of evidence which relate to architectural, design and townscape matters are prepared with due regard to, and in recognition of the RIBA's Code of Professional Conduct and Disciplinary Procedures and the three principles of professional conduct - Honesty, Integrity, and Competence. I confirm that the opinions expressed in regard to those matters are my true and professional opinions.

All of my evidence is prepared with the benefit of being a Mortlake resident since 1984, and having closely followed the various design iterations and previous planning applications for this appeal site. I have also been a contributor to the alternative Community Plan prepared by local residents which has been shared with Richmond Council and the developers and their team.

2.0 Outline and Summary of my Evidence

My evidence is divided into the following main sections:-

Section 3.0 - Briefly describes the local context to the appeal site outlining the features and characteristics of the immediate surrounding. It also describes the local infrastructure and the specific constraints of the site in terms of access and movement.

Section 4.0 - Briefly describes the existing features of the appeal site itself, the existing brewery buildings/structures and those heritage assets which are required to be retained.

Section 5.0 - Summarises the development proposals contained within Appeals A & B

Sections 6.0 to 10.0 - set out my evidence in relation to Appeals A & B on Urban Design and Townscape, Layout, Density, Massing & Scale, Identity, Building Heights and Land Use matters.

Section 11.0 - Addresses Appeal B and the resultant loss of the Other Open Space of Townscape Importance (OOLTI), and evidence of non re-provisioning.

Section 12.0 - Draws together my evidence with that given by the other witnesses on behalf of the MBCG and sets out my general conclusions on what this means for the determination of these appeals.

The Appendices - contain several illustrations and plans which are referenced in the Proof and are included to support the written evidence.

In brief summary my Proof of Evidence puts forward four main arguments:-

Firstly - that the cumulative scale and density of the two inter-linked development proposals constitute gross over-development of the appeal site to such an extent that they are harmful, and that the proposed uplifts in average density of residential development, combined with the other commercial land uses and the large secondary school are inappropriate and result in a built form wholly out of character with the existing area by virtue of its layout, height, massing, scale and the visual identity of the building typologies.

Secondly - that the heights of six of the proposed buildings exceed the maximum height limit of 7 storeys and are located in contravention of the Adopted Planning Brief. These buildings contravene the London Plan Policy D9 (CDD.6), the Local Plan Policy LP2, (CDE.1), and the Adopted Planning Brief (CDE.2) They are also at odds with the emerging Publication Version Local Plan (CDE.19).

Thirdly - that Application B sites the proposed secondary school and its play/recreation space on the protected sports fields which are designated in the Local Plan as Other Open Space of Townscape Importance (OOLTI). The Local Plan was amended via the examination process with a clause added by the Council to permit re-provisioning of OOLTI, subject to the replacement being of equal or improved quantum, quality and openness.-see Policy LP14. (CDE.1). As a baseline the proposed development is required to provide public open space, dedicated play areas, and sufficient open space between buildings to provide a quality of internal accommodation and public realm to meet National Policy, London Plan Policy and Local Plan Policy. Open space is provided in the development but is then 'double-counted' in large part as the re-provisioned space. This section of the Proof demonstrates why the re-provisioning does not comply with policy. Because of the inter-linkage of Applications A & B this concludes that Application B is non-compliant by virtue of the inadequacies within Application A.

Fourthly - that, as a result of the matters raised in my evidence and that presented by the other witnesses on behalf of the MBCG, the appeal proposals conflict with both the adopted and emerging draft allocations for the site and therefore, with the development plan as a whole. This has implications for the weight given to the benefits of the appeal proposals, both in the heritage and overall planning balance, such that those balances tip clearly against the proposals and the appeals ought to be refused.

3.0 - Townscape

3.1 - Context and Surroundings to the Appeal Sites

This section of my Proof of Evidence summarises the context of the appeal sites and provides a descriptive summary of the surrounding character of Mortlake, Barnes and East Sheen (“The Three Villages”), and the relationship between the site and the River Thames and the Metropolitan Open Land to the north known as Duke’s Meadows.

This sets the contextual scene to which the document will refer back to in later sections of the Proof.

3.1.1 Land to the North

Directly to the north of the appeal site is a vast area of Metropolitan Open Land (MOL), which encompasses Dukes Meadows and accommodates a range of grass sports fields, 3G all-weather sports pitches, a nine hole golf course, golf driving range and public allotments. These are bounded by the River Thames, the A316 to the west and the Barnes/Hounslow railway line to the east.

Other open sports grounds extend further west in the form of the Quinton Hogg Sports Memorial grounds, west of the A316 and the King’s School sports grounds on Dukes Meadows further eastwards towards Chiswick.

There are four rowing clubs located along the riverside within this extensive swathe of open green space which provides the northern backdrop to the appeal site. The sheer scale of this open green space and its tree coverage create a distinctly rural character to this northern horizon.

3.1.2 The River Thames

The Thames and its southern towpath form the site’s northern boundary from Ship Lane to Bulls Alley at the eastern end of the site. The river is broad in this stretch, some 150 metres bankside to bankside, and is still tidal as far upstream as Teddington. The towpath is a public access route and is part of the Thames Path and an introductory gateway to “Arcadian Thames” and the national importance of Kew Gardens just a short distance upstream.

The character of the towpath from Putney to Richmond is distinctly rural in nature, edged by low level vegetation and dense linear stands of trees which give cause to its descriptive name “The Woodland Towpath.”

The site overlooks the end of the annual Oxford and Cambridge Boat Race with the finish line of the race alongside the listed structure of Chiswick Bridge.

3.1.3 Thames Bank

Abutting the site to the north-west is a charming enclave of largely 17th century residential buildings, many of which are Grade II Listed, and directly overlook Thames Bank. This grouping also contains other later Buildings of Townscape Merit. A more recent cluster of 12 townhouses forms Parliament Mews, midway located in the enclave. Other than the Ship Inn public house all are residential in use and constructed in a mix of traditional brickwork and painted render finish. They are 2/3 storey in form, some 2 storey with roof dormer level accommodation. Several of the larger houses have extensive rear gardens which back onto the north west part of the appeal site.

3.1.4 Western Context

Wadham Mews and Watney Road form a low density residential area immediately to the west of the appeal site. Again these homes are 2/3 storey in height with the gardens of the Watney Road properties backing onto the appeal site sports fields. Further west, and adjacent to the A316 is another low density residential scheme, Chertsey Court, largely 4 storeys in height with elements up to 5 storeys. The vast area of Mortlake Cemetery (MOL), extends further west towards Kew.

3.1.5 Land to the South

This zone of land extends southwards to the Upper Richmond Road and is bounded to the west by Clifford Avenue and to the east by White Hart Lane. Within this zone are a number of older residential buildings, some listed, but the majority are a mix of Victorian and Edwardian in era and were constructed in the property boom when Mortlake, East Sheen and Barnes expanded rapidly after the building of the London to Richmond railway.

The character of the local context is one of sub-urban, low density, 2/3 storey houses in terraced streetscapes. Post WWII several council built flats were constructed along Mortlake High Street. The lone taller building is Vineyard Heights which is a former 1960's office building now converted to residential uses above lower level shared-office uses.

There are a mix of commercial and retail uses on Mortlake High Street, White Hart Lane and further south on Sheen Lane south of Mortlake Station. The majority of these are modest in scale, and many have residential space above the ground floor retail/office uses.

The predominantly sub-urban streetscape grain extends still further southwards beyond the railway lines and the Upper Richmond Road in an even lower residential density extending as far as the edges of Richmond Park with individual houses in large detached plots.

3.1.6 River Frontage to the East

Immediately to the east of Bulls Alley are several recent, more contemporary residential developments including Boat Race House and Dukes Court. These are mid-density in scale and extend to 4/5 storeys in height with a variety of roofscape profiles and use of external materials.

Further east of these are older 2/3 storey historic buildings which date from the 17/18th centuries to later Victorian properties.

Acacia House, Afon House, and Suthrey House are listed properties and Tapestry Court (formerly The Queens Head Hotel), is a landmark riverside Building of Townscape Merit.

John Dee, advisor to Queen Elizabeth 1 lived on the riverside adjacent to Tapestry Court, and the famous Mortlake Tapestry Works were built immediately adjacent by Sir Francis Crane in 1619.

The oldest building in this cluster of historic sites is the listed church of St.Mary the Virgin constructed in 1543, but which dates further back to 1348.

3.1.7 Mortlake Green

Mortlake Green is located immediately south of the appeal site and is the largest area of green public open space in Mortlake. It contains a public children's play space and open recreational green space. It is bounded to the south by Mortlake Station and two commercial builders/timber yards.

Thomson House Primary School is located opposite on Sheen Lane and the school pupils use the Green for supervised play/sports use due to lack of alternative space within the school grounds.

3.1.8 Townscape Context Summary

As outlined above the predominant character and context of the existing townscape surrounding the appeal site can be summarised as follows:-

- It is one of low density, sub-urban residential development with the majority configured as 2/3 storey streetscape of terraced housing and older detached properties.
- Development densities range from the lowest at 36 homes/ha to the highest between 60-80 homes/ha.
- Mortlake is also blessed with a deep history with numerous heritage assets alongside or adjacent to the site.
- Mortlake is famous for its 'alleyways' - some like Aynescombe Path date back to Tudor times, whilst others are incorporated into later Georgian and Victorian development in the area. These create a permeability of public access routes between the 2/3 storey properties and boundary walls.
- Within the appeal site itself are the former sites of Cromwell House and the Bishop's Palace.
- Three designated Conservation Areas are located adjacent to the site, namely, the Mortlake Conservation Area (Area33), the Mortlake Green Conservation Area (Area 51), and the Sheen Lane Conservation Area (Area 64).
- The River Thames and the towpath create a unique, dynamic and highly attractive public waterfront context to the site.
- The southern riverbank is strongly defined by a green corridor of tree canopies and low scale buildings, either side of the appeal site, in the stretch from Chiswick Bridge to the White Hart pub. This tree lined corridor extends upstream to Richmond and downstream as far as Putney - (see Appendix 2 - MBCG Plan).

3.2 Surrounding Infrastructure

The appeal site is large, some 8.6Ha (21 acres) in area and enjoys a unique riverside setting. Its designation for re-development is embodied in the Richmond Local Plan through the allocation in Policy SA24 (CDE.1), and in its specific Site Allocation.

However, the scope for re-development is significantly influenced by the particularly constrained nature of this unique location, bounded to the north by the River Thames and to the south by the railway line with its four level crossings over the short stretch of line between Barnes, Mortlake and East Sheen. For such a large sub-urban site it is important to highlight how constrained it is by the surrounding features and infrastructure so that these factors too can be evaluated in relation to the development proposals.

Key infrastructure factors which influence and place limits on the appropriate scale of development at the appeal site can be summarised as follows and are covered in more detail in the evidence provided by Howard Potter of the MBCG.

- Vehicular access to the site is limited to one main highway route - the A3003 Lower Richmond Road which extends eastwards to become Mortlake High Street.
- The junction configurations at the western end of the Lower Richmond Road create a bottleneck to traffic movement caused by the awkward highway confluence of the A316 and the A205 South Circular at Chalker's Corner.
- This junction and the Lower Richmond Road / Mortlake High Street are now under even more pressure from local and orbital traffic due to the closure of Hammersmith Bridge to vehicular traffic.
- Costs to repair this bridge are now estimated at £250m but there is no agreed structural solution or agreed source of funding to re-instate the bridge for vehicular use again.
- The level crossing at Mortlake Station is closed for up to 45 minutes of each hour in peak times. This causes severe congestion on Sheen Lane which in turn backs up to the Lower Richmond Road / Mortlake High Street.
- This situation is repeated at the other local level crossings on White Hart Lane and Manor Road, and to a lesser extent on Vine Road in Barnes.
- The consequence is added pressure on the highway network in the area, the build up of congestion, and at times a total local gridlock thus constraining the only access to the site.
- The build up of traffic and driver frustration particularly at the Mortlake Station level crossing creates a real safety concern as pedestrians, cyclists and vehicles seek to get through the crossing before the next closure in the busy peak am/pm periods.
- The presence of the Thomson House Primary School right next to this crossing adds even further pressure and potential dangers to children and parents at school start/end times.
- These dangers and safety concerns are well understood by Network Rail and Richmond Council but the infrastructure layout is such that only a comprehensive redesign could resolve the situation.
- Mortlake station is some 250m from the Stag site boundary and bus services operate on the Lower Richmond Road / Mortlake High Street. Nevertheless the PTAL rating for the site is categorised as PTAL 2 - Poor with zones in the north west of the site rated PTAL1b - Very Poor.

These concerns regarding the transport infrastructure surrounding the appeal site are addressed in more detail in the evidence of Howard Potter.

4.0 The Appeal Site

4.1 Site History

There was a brewery on this site dating back to the fifteenth century. More 'modern' commercial brewing commenced in the 1760's.

Initially the brewery operations were located to the east of Ship Lane, as far as Bulls Alley but the operations expanded gradually to occupy land to the west of Ship Lane.

This expansion also included the sports fields in the south west of the site which provided sports and recreation facilities for the brewery's large workforce and the local community.

Almost all of the older buildings were gradually demolished and replaced during the modernisation of the brewing processes in the period between the 1960's and 1970's. The

Maltings building and the former Hotel & Bottling Buildings are the only remaining buildings of note and historical interest.

4.1 Existing Context

The main brewing structures are intentionally located in the heart of the site with the main process buildings to the west of Ship Lane. These are large buildings but are metal clad, largely windowless, and finished in muted colours to reduce their presence from perimeter and longer distance views. Perhaps the most dominant structure is the energy centre chimney.

4.2 Eastern Zone

The eastern half of the site is surrounded by tall brick walls. These form the site boundary with Mortlake High Street to the south. The walls which form the northern boundary are almost 240m long and extend from The Maltings to the west as far as Bulls Alley at the eastern extremity. Within this eastern zone of the site there is a large footprint, single storey, former distribution warehouse building, but this is completely concealed from external views due to the height of the brickwork boundary walls.

The Maltings building and the former Hotel & Bottling Buildings anchor the north and south corners of this eastern zone.

4.3 Western Zone

The western zone is divided into three main areas namely, the central area of large process structures, parking areas and small ancillary buildings to the north and the large area of sports fields in the south west bounded by Williams Lane and the Lower Richmond Road.

The sports fields are protected open space and designated as Other Open Space of Townscape Importance (OOLTI) under Policy - DM OS3 of the Local Plan (CDE.1 - ref; LP14 - 5.3.6).

4.4 Protected Buildings & Watney Sports Fields

Heritage matters are covered in the evidence provided by Dorian Crone in his Proof of Evidence for the MBCG (and Mortlake with East Sheen Society). This sub-section of my proof refers to three aspects as contextual background to which the document refers back to in later sections of my proof.

4.4.1 The Maltings.

The Maltings was built at the turn of the century, became operational in 1902, and was used as a process building for hops and grain. It was designed with very low ceiling heights, just enough to stand-up in, and although referred to as having eight floors (with loft-level east section), these are floor to floor levels of only around 2.365 metres compared with higher storey heights for contemporary residential buildings (3.2-3.6m) or commercial space (4.2-4.5m).

The Maltings is a protected building and classified by Richmond Council as a Building of Townscape Merit (BTM).

The Planning Brief for the Stag site (SPD - Adopted July 2011- (CDE.2 - Appendix 1), requires the retention of this building and protection in terms of its landmark characteristics and setting on the Thames Riverside.

4.4.2 The Hotel and Bottling Buildings

The Hotel and Bottling Building are late Victorian in style, located at the western end of Mortlake High Street. These two structures merge into each other and are also protected, and intended to be retained and incorporated into new development proposals.

The curved corner section of the Hotel Building is three storey with basement whilst the Bottling Buildings has a part basement with two tall storey heights above. The construction of this building using cast iron columns and brick-vaulted structures is of historical interest.

4.5 The Watney Sports Fields

These sports fields have been open space for centuries and are shown as open fields in the Rocque Map -1746. They were used as a cricket pitch and shown as such on the 1913 Ordnance Survey.

When Watneys expanded their brewing operations the cricket pitch was retained as part of their sports and recreation facilities for what was then a workforce of 1400 or so staff.

The sports fields are by far the largest open green space in Mortlake (2.20Ha).

The two football pitches are used by a local club, and two local primary schools use the space by agreement with the owners for sports and recreation use by their pupils. Annual Community Fairs are also held on this space. When in use by Watneys there were regular cricket matches featuring famous England cricketers in charity matches. The World Cup winning England football team trained here in 1966.

The pitches are now protected as OOLTI space and the Adopted Planning Brief requires the retention of the sports fields and increased public use.

5.0 Development Proposals - Applications A & B

The appeal proposals comprise a residential-led mixed use development which includes: up to 1,075 residential units, offices, cinema, boat house, small 16-bed hotel, "flexible use" floorspace to accommodate a range of uses including retail space, bars, cafes, restaurants etc, and a large 1,200 pupil secondary school with sixth form.

The proposals for the secondary school (Appeal B) and the eastern half of the site (part of Appeal A) are submitted in detail whilst the remainder of the western half of the site (part of Appeal A) is submitted in outline with accompanying Design Codes.

The residential blocks range in height from 3/4 storeys adjacent to Williams Lane to 6/7/8/9 storeys in those blocks facing the riverside in the eastern zone of the site.

The commercial land uses are concentrated in the eastern half of the site; the cinema opposite Mortlake Green in Block 1 (with residential space above), the hotel and offices in Blocks 5&6 on Mortlake High Street, and the remainder of the flexible space located at ground level in Blocks 2/3/4/7/8/11 and 12.

Blocks 13-17 in the western half of the site are completely residential in use and range from 4-8 storeys in height. Blocks 18&19 contain the majority of the affordable homes and range in height from 3/4 -6 storeys. Two linear terraces of 2/3 storey townhouses complete the development layout in the western zone, backing onto the existing residential properties on Thames Bank.

6.0 Urban Design and Townscape

6.1 Masterplan Layout

The Stag site has been in private ownership for many years and the redevelopment naturally allows the removal of a secure boundary and increased permeability, one of the key objectives of the Site Allocation and the Adopted Planning Brief.

Both National Planning Policy and the London Plan seek to optimise large sites such as this but the cumulative scale and massing of the development proposals go beyond optimisation and create over-development, particularly when considering the surrounding context and the constraints outlined earlier.

The masterplan layout creates a dense composition of repetitive, large footprint blocks which are orientated and arranged in a manner such as to:-

6.1.1

Create a frontage to Mortlake High Street along the line of the old boundary walls. These Blocks contain no active frontages along this 170 metre frontage to the High Street save for the hotel at the western end. Instead the old boundary walls are replaced by offices in Block 5, and a lifeless frontage to Block 10 with its entrance to the basement car parking. The proposed boathouse in Block 9 addresses the riverside, not the High Street, and is partially elevated due to the flooding issues. The opportunity to deliver substantial public benefits and to re-invigorate the High Street, as intended in the SPD (Para 2.36), is lost.

6.1.2

Blocks are aligned to create a new east/west 'street' -Thames Street - immediately behind the existing High Street. This street is just 15.0 metres wide yet is flanked by Blocks which extend up to 8 & 9 storeys in height. Even with the lower blocks to the south of the street this will dominate the public realm and create an oppressive environment. Any active frontages which could have enlivened Mortlake High Street are now less visible in the new 'street'.

6.1.3

To the north of this new 'street' the blocks are orientated in parallel form at right angles to the River Thames. These blocks have gable ends which are extremely close to the towpath and at 8 & 9 storeys in height will loom over the towpath and the riverside in an over-dominant and oppressive manner. Due to the height and orientation of these blocks many of the landscape spaces and the towpath itself will be over-shadowed as clearly indicated in the technical reports - (Waterman's ES Addendum Part 2 Nov 2023 - pages 7-15 (CDA.82)). The almost rural nature of the towpath along this stretch of the river will be significantly harmed.

6.1.4

To the west of Ship Lane Blocks 13-17 form two parallel blocks of residential buildings which start at 4 storeys in the south adjacent to the Jolly Gardener pub (a BTM), but then rise dramatically up to 7 & 8 storeys in Blocks 15 & 17. The two linear blocks are some 20 metres apart but this composition will create an oppressive environment between the two parallel forms, over 150m in combined length, and especially in the east/west ground level public routes between Blocks 15/16 and 13/17.

6.1.5

The large footprint (40 x 100 metres), 3-storey secondary school with its MUGA and fenced/floodlit 3G all-weather sports field result in the loss of the OOLTI protected sports fields. What was intended in the Adopted Planning Brief, namely the retention of the sports fields for increased public use, has been abandoned in these proposals with a mere pocket-park left as a residue. (OOLTI and re-provisioning is dealt with separately later in this Proof - Section -11.0).

6.2 Green Link & Blocks 20 & 21

There are two aspects specific to the masterplan layout which are accepted to be positive, namely:-

- the provision of the Green Link from Mortlake Green to the River. Although the link is a prerequisite of the Adopted Planning Brief it is encouraging to see its inclusion but it is nevertheless narrower than indicated in the Brief, a consequence of the density of the proposals.
- the townhouses in Blocks 20 & 21 are a positive revision from the previous applications and are of a scale and height more compatible with the surrounding grain and context. A large, mature plane tree is located to the rear of the eastern end of Block 20. This is designated with a Tree Preservation Order and is an important feature to the rear of Thames Bank which must be retained.

6.3 Density

6.3.1

Mortlake is one of the 'villages' which are recognised in the Richmond Local Plan as distinct local communities within the borough. The characteristics of Mortlake are summarised in a recent report carried out for Richmond Council by Arup - Urban Design Study April 2023 - pg 384 (CDE.15).

After announcement of the planned closure of the Stag Brewery Richmond Council conducted public consultations during 2010 & 2011 - (All in One -Your Mortlake). The output acknowledged community feedback and envisaged a scheme in the order of 560 homes together with other mixed uses, and a primary school; optimising the site yet remaining sensitive to the unique location, heritage and local context.

The London Plan seeks to optimise sites if well connected to public transport and of a scale involving comprehensive re-development of brown field locations. (see CDD.06 Policies D1/D2/D3).

The Local Plan Policy LP34 (CDE.1), sets a target of 3,150 homes for the period 2015-2025 with just 400-500 in the East Sheen, Mortlake & Barnes Common, and Barnes area. This target is slightly increased in the Publication Version of the Emerging Local Plan to 4,110 over the next ten years with 800-900 homes in the same sub-area including Mortlake (CDE.19) -Policy 10.

6.3.3

The development proposals include up to 1,075 residential units, a wide mix of commercial uses and the large 1,200 pupil secondary school.

I am of the view that the Stag scheme would create a disproportionately high concentration of new homes on this site when one considers the addition of the other major approved or proposed

residential developments planned in the local area. Schemes which would be largely built-out in this target period. (ie: Homebase- 453 units & Barnes Hospital - 88 units).

These three schemes alone would represent a doubling of the higher targets in the Emerging Local Plan. The appeal scheme alone would deliver 120% of this higher target.

6.3.4

Richmond Council have been criticised for their poor record of delivery of new/affordable homes and account for this, in part, as being due to the historical/heritage sensitivities in the borough. As large sites such as the appeal site do not come forward that often it is right to optimise such opportunities. However, to singularly overload the site to such a disproportionately high density cannot be sustainable either in terms of the built environment or in terms of excessive pressures on the local social/health services infrastructure.

6.3.5

As outlined in Section 3.1.8 the existing local residential densities range from as low as 36 dwellings/ha to around 90/ha in one pocket of residential dwellings, and this drops to an average around 60-80/ha further south beyond the railway line. The appeal scheme creates a significantly higher residential density of 125 units/ha and this rises to 160 units/ha when the secondary school site is excluded as a separate planning application. The density is further pressured by the other flexible/commercial uses including, offices, cinema and hotel which total a further 10,300 sqm of floorspace. This further reinforces my view that rather than optimising the site the proposals create a dense over-development.

This is well illustrated in the Appendix 1 - 3D Aerial View from the north-east which shows the dramatic contrast between the sub-urban, low scale townscape of Mortlake and East Sheen and the over-urbanisation of the appeal proposals.

6.3.6

The red line site boundary now extends wider than on earlier planning applications and encompasses the towpath, Ship Lane and Bulls Alley slipways and Williams Lane and presents a distorted representation of site density. The red line now encompasses off-site works required to mitigate the development which are located on the towpath, Williams Lane and the crossing to Mortlake Green.

6.3.7

The site area for the school (Appeal B) is circa 1.89ha. This is significantly below the DfE guidelines for secondary schools of this size as indicated in BB103 -(CDL.20 -Annex B -Site Areas page 44) The guide recommends a minimum site area of 5.40 ha when using the lowest figures in the site allowances. Even taking into account the scarcity of land in London and the need to optimise sites, this further demonstrates the overly high density of the cumulative proposals (A & B), and the inadequacy of the site for 1,200 pupils.

If the 3G all-weather pitch is in use then the remaining open space for the rest of the pupils is totally inadequate.

There is only provision for 15 parking spaces which is extremely low for the likely staff numbers, even allowing for a high percentage of staff travelling on foot, or by cycle and public transport.

6.3.7

National Policy seeks to optimise sites, but in my opinion the appeal proposals represent a significant uplift in the average density of the surrounding residential area and result in a built form which is wholly out of character with the existing area, and as such contravene NPPF para 130.

7.0 Massing and Scale

7.1 Massing Concept

The design principles which guide development are articulated in Section C of the Adopted Planning Brief. (CDE.2). These require height and scale to diminish towards the perimeter of the site and along the riverside, and if taller buildings are necessary for reasons of viability these should be located at the core of the site.

The heights of buildings do reduce in scale in the north-west of the site in Block 18, and in the form of the townhouses (Blocks 20 & 21), further north, re-introduced following the refusal of the earlier scheme considered by the Mayor.

Building 9 at Bulls Alley also reduces in height and scale. Buildings 1 & 6 are of a more modest massing as is the remodelled existing Building 5 and its eastern extension.

However, in the zone east of Ship Lane the perimeter of the site along the riverside is arranged with six of the tallest buildings in the scheme, directly at odds with a core urban design principle of the SPD. These buildings create a building line with their gable ends very close to the site boundary looming over the towpath and the riverside.

Other key factors in the SPD which are either ignored or not satisfied in the appeal proposals can be summarised as follows:-
(see CDE.2 - Section C. 5.25 to 5.31 -pgs 20 to 21- please note that there is a duplication in the numbering on pg 21).

7.1.1

The proposals do not consider or respect the existing urban grain and scale nor take the opportunity to reflect the character and regular pattern of the local streetscape and distinctive alleyways throughout Mortlake.

7.1.2

The new buildings should be less than the height of the Former Maltings building which is clearly not the case.

The tallest building, Block 8, is 9 storeys in height and its roof line is some 10.0m above the main ridge line of the Maltings building. Block 2 and all of the blocks facing the riverside (Blocks 7/8/11 & 12), are all much taller than the ridge line of the Maltings.

7.1.3

The SPD also states that new buildings should consider views of the Maltings to ensure it is not obscured or subsumed by new surrounding development. Again this is clearly not the case as Buildings 2 & 3 are positioned very close to the Maltings. When viewed from Chiswick Bridge and from public routes downstream, the siting and heights of Buildings 2/7/8/11/12 in particular will both dominate and subsume this heritage asset and indeed emasculate its status as a local landmark.

Due to the massing and scale of Building 2, the Maltings will also be completely obscured from view on approach towards the riverside along the Green Link.

Corner 'turret-roof' features are located at the southern ends of Blocks 2 & 7 and rise above the general roof line by around 5.0m. These appear rather curious and dated in appearance.

7.1.4

Buildings along the riverside boundary should avoid a continuous ribbon of development and should not over dominate the towpath. In my view the proposals do not respect this design principal with 7/8 & 9 storey buildings bearing down directly alongside the towpath and the gable ends and general massing presenting a ribbon of dense built form when viewed from many directions.

7.1.5

Buildings should include an appropriate set back from the towpath at ground level and upper floor levels and riverside buildings should allow daylight and sunlight onto the towpath. The proposals fall short of these requirements where the style and architecture of the blocks' gable ends create a hard edge overlooking the towpath with little relief or setbacks at ground or upper levels.

The overall scale, massing and height of the riverside blocks create extensive overshadowing both of the new courtyards between blocks and over the towpath itself and the River Thames.

7.1.6

Blocks 7/8/9/11 & 12 are positioned very close to the line of the existing site perimeter walls which here form the appeal site boundary. Each of these blocks are set back by as little as between 5.0 & 6.0m from their gable ends to the site boundary.

All of these blocks are elevated on a podium level which is approximately 1.4m above the towpath and the four taller blocks extend to over 30.0m in height above this, so close to the towpath and the river edge.

7.1.7

The Green Link is a fundamental element of the vision set out in the Site Allocation and the SPD. Its form and location are indicated in Appendix 1 of the SPG, and also illustrated in my Appendix 3 -MBCG Plan 1.

The Green Link in the appeal proposals is much narrower than shown in the SPD and measures 30.0m in width, but the actual greening elements are much narrower. The Link is flanked in the south by the proposed cinema - Block 1, and an extension to the Former Hotel in the form of Block 6. These two buildings are of a modest scale and are a reasonably proportioned 'gateway' to the Green Link from Mortlake Green and the south.

However, Blocks 2 & 7 excessively compress the Link. They are 8 storeys in height and their facades create relentless, sheer-faces, 70 and 80m long respectively.

The Green Link is seen as the opportunity to create a sense of place, and a focus for the whole development; an opportunity to 'put the heart back into Mortlake'.

Sadly however, the massing and scale of Blocks 2 & 7 lack a human scale, especially at ground level, and in my opinion do not create an environment which will encourage inter-action, activity and a vibrant heart to the area.

7.1.8

The Maltings Plaza is a very large hard surfaced area but lacks subtlety and shelter for spill-out from the flexible use spaces at the gable ends of Blocks 2/4 & 7. The Plaza may be a focus on the annual Oxford and Cambridge Boat Race Day but this is hardly sufficient to anchor a longer-lasting vitality and public usage of the Green Link.

7.1.9

The western half of the appeal site has been submitted in outline only and future development is guided by Design Codes. Visual material in the appeal proposals only illustrate these proposed blocks in outline and their scale, massing and heights are thus 'ghosted' on these views.

Blocks 13-17 in particular create a very dense massing of buildings and their visual impact is considerable when viewed from the south-west and as a backdrop to the Maltings from long distance views downstream, and likewise from Chiswick Bridge and the Dukes Meadows north bank.

In summary I maintain that many of the key design objectives set out the Adopted Planning Brief are not met and thus the proposals are non-compliant with Local Plan policy. In this respect the proposals are equally at odds with key design principles set out in the National Design Guide (CDD.5), and the London Plan (CDD.6).

8.0 Identity - Building Typology

8.1

The proposals adopt two building typologies, namely:- warehouse style and mansion blocks. The warehouse style is used on the High Street whilst the mansion block typology is used on all of the riverside residential blocks. Design Codes are set out to control development of the residential blocks covered only in outline to the west of Ship Lane.

8.2

Warehouse buildings were traditionally located in the docklands areas and on the riverside, and the mansion block style referenced in the submission documents quotes Digby Mansions next to Hammersmith Bridge, several miles downstream from the Stag site.

It seems to me that there is a confused architectural logic here in the location of these two distinct typologies. The Maltings is of warehouse style yet is juxtaposed with mansion blocks right alongside in Blocks 2 & 3 and the warehouse style is then used again on the southern extremity of the site on the Mortlake High Street frontage.

8.3

There is no significant local precedent to adopt the mansion block style which, by its very nature and roof-scape, creates a rather alien environment compared with the predominant grain and streetscape typology. Cowley Mansions located at the eastern end of Mortlake High Street are a variation of the mansion style, in this case adopting a completely different architectural treatment in a half-timbered, mock-Tudor appearance.

8.4

The typical mansion block is more characteristic of higher density urban areas in Chelsea, Battersea, Kensington, Pimlico and Central London.

Initial design proposals adopted the deep red brick facade treatment traditionally used in late Victorian/Edwardian mansion blocks. Some variation and softening in the brickwork tones has since been introduced in the current proposals but this is a minor gesture when compared with the dominant and strident nature of the blocks and especially those facing the river and towpath. In fact this design change introduces another architectural confusion with a more contemporary visual appearance and use of brickwork applied to a style originating in the late 1800s/ early 1900s.

8.5

Large sites of this scale can of course create their own characteristic but are still required to respect and enhance the local context. However, when considered holistically the scale and massing of the mansion blocks combined with their external appearance appear alien within the local context and wholly out of character with the existing sub-urban surroundings.

9.0 Building Heights

9.1 Policy

9.1.1

The London Plan Policy D9 (CDD.6), deals with tall buildings and clearly defines these and directs boroughs within London to determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. The Policy also requires the impacts of tall buildings to be considered in accordance with D9.C.1) visual impacts.

The Richmond Local Plan identifies a limited number of town centre locations suitable for tall buildings, with the appeal site identified as a rather exceptional case in a sub-urban environment, but within a large re-development site already accommodating existing large, tall brewery process buildings: see Policy LP2 - 4.2.2 - (CDE.1)

The SPD includes Appendix 1 which provides guidance as to building heights and sets a maximum height of 7 storeys.

9.1.2

The Regulation 19 version of the Emerging Local Plan was submitted for examination on 19th January 2024 with hearing dates yet to be fixed. The Emerging Plan makes reference to the Urban Design Study carried out for Richmond by Arup-dated 4th April 2023 (CDE.15 - A.5 -Fig 445 pg 383 & pg 384)

This document goes into great detail assessing urban design within the borough and does so with the eleven 'villages', one of which is Mortlake. It is relevant that the borough's own policy and other official publications refer to Mortlake as one of its 'villages' - accentuating the scale and character of the area.

9.1.3

Section A5 of the Arup study (pages 383-384) deals specifically with the possibility of tall buildings on the appeal site. This includes a diagram Fig 445 which illustrates a series of contours related to building height with a limit of 7 floors in the core area and diminishing in height to respect the scale of the surrounding streets,Thames Path and riverside.

In this respect the Study re-iterates the design guidance in the Adopted Planning Brief for the Stag site and its Site Allocation. There is nothing to suggest that buildings above seven floors are appropriate.

I see nothing in the Emerging Local Plan which might change or relax existing Local Plan Policy which sets a definitive building height limit for the appeal site of 7 storeys.

In this respect the proposals contravene the Local Plan Policy with respect to building heights and tall buildings as well as the Adopted Planning Brief.

9.1.4

At the planning committee meetings in July 2023 and January 2024 the planning report and the members recognised the non-compliance of the proposals in terms of building heights and tall buildings, and acknowledged the resultant impact and harm, but felt that the public benefits of the two applications outweighed this. This logic, the committee members also applied to the non-compliance in relation to the affordable housing percentage of just 7.5%.

What was not considered was the fact that many of the items considered as public benefit are in fact mitigation measures which are required as a direct result of the cumulative scale, density, nature, and thus harms, caused by the two applications. I address this point in more detail in the final Section 12.0 of my proof.

9.1.5

At those same planning committee meetings it was also felt by members that the height of the proposals could be justified by the presence of the existing tall, ugly industrial buildings on the site. What was not considered was Local Plan Policy LP2 -Building Heights - 4.2.7- which states that where existing tall/bulky buildings have been erected and which have spoiled the historic skyline as well as the established character of areas, they will be considered as a poor precedent for future development - existing tall or taller buildings should not be used as a precedent for allowing further, or replacement, tall or taller buildings.

9.1.6

Site Elevation FF (Squires drwg-C645-Z1- E- FF. 001RevG), illustrates the whole of the river frontage of the appeal site from Thames Bank in the west as far as Bulls Alley downstream. This clearly shows the extremely abrupt transition in height from the existing buildings east of Boat Race House up to the much higher appeal site buildings which rise sharply from 5 up to 9 storeys. The contrast between the existing historic buildings on Thames Bank and Blocks 13-17 behind is even more dramatic and disturbing.

10.0 Land Uses

10.1 Proposed Mix of Uses

This is a residential led mixed use scheme combined with new secondary school. The principles and vision set out in the SPD and re-iterated in the Site Allocation aspire to create a new 'heart' to Mortlake.

In terms of the proposed land uses these generally align with the Adopted Planning Brief but the new secondary school is built on the OOLTI protected sports fields, and its need is challenged. The OOLTI aspect of non-compliance with policy is dealt with in a later section of this Proof and the need is addressed in the Proof of Evidence of Geoff Woodhouse on behalf of the MBCG and representations by four existing local secondary and primary schools as 'Interested parties'.

10.2 Commercial Uses - Flexible Space

There is a reasonable mix of commercial uses including offices and flexible space, largely accommodated on the ground floors of blocks east of Ship Lane. A key objective of the SPD and the Site Allocation is to create a new 'heart' to Mortlake. The Green Link provides that opportunity as a focus space leading to the Maltings Plaza and the Maltings itself.

However, the ground floor space fronting onto the Green Link, although featuring a taller floor to floor storey height, lacks features such as colonnades or architectural devices to introduce a human scale and interface with public activity. It is also possible that the flexible space is too broadly distributed over the ground floors of Blocks 1/2/3/7/8/10/11/12 to create the desired 'heart' to the development.

There is some doubt about the viability of the flexible space at the gable ends of four of the blocks facing the towpath (Blocks 7/8/11/12), in addition to that within Blocks 4 & 9.

10.3 Cinema

There is some doubt in my mind about the future success or survival of the proposed cinema in Block 1, given that there is a very successful, well-established operation at the Olympic Studios in Barnes, and other national multi-screen cinemas close-by in Richmond, Putney and Kingston. If an operator is not secured or the use failed then the predicted night-time activity would be lost which in turn would be likely to affect the success of other uses such as retail, bars, cafes, restaurants etc, in the 'heart' of the scheme.

10.4 Public Uses

A rowing club boathouse is proposed on the ground floor of Block 9 but the design layout of the ground floor and lack of suitable storage space raises questions as to the viability of being adequate for this use. Other local rowing clubs have large internal and external spaces for storage of 'eights', sculls and trainer motor boats. Also I am not aware of any firm commitment to this use although it is cited as a public benefit.

My same comment applies to the possible use of flexible space to accommodate a police presence and community space on site. There is no firm commitment to provide these social facilities.

The use of the former Hotel building as a 16 bed hotel /public house is at first glance a positive regeneration but the current scheme is a facade retention only, and involves the loss of historic assets which include attractive cast iron structures and brick-vaulted basement construction. This aspect of heritage harms is dealt with in Dorian Crone's Proof of Evidence.

10.5 Secondary School & Community Plan

This is dealt with by other MBCG witnesses and interested parties including existing local schools. They challenge the need for a school provision of this scale and outline the potential harms to those schools and their 6th forms.

After the Mayor's refusal of the previous scheme on the appeal site the MBCG were instrumental in putting forward an alternative solution to address secondary school place needs and similarly to comply with the height limits and broader objectives of the SPD - a 'Community Plan'.

Although this Plan is outside the specific remit of the Appeal it is valid to outline its composition if just briefly. (see Appendix 8).

The key elements of the Community Plan and advantages it would deliver can be summarised as follows:-

- All buildings are kept below the 7 storey height limit.
- Impact on heritage assets is positively addressed.
- The existing OOLTI sports fields are retained and fully accessible for public use.
- Thomson House Primary School is relocated to the Stag site allowing its two split sites, owned by Richmond Council and the DfE, to be repurposed potentially for affordable housing.
- The re-location would remove the existing risks in terms of safety for pupils and public given the Thomson House school is located right next to the dangerous Mortlake level crossing.
- The re-location requires a much smaller site and would thus allow more housing to compensate for units lost by reducing building heights to below 7 storeys and yet potentially deliver a larger proportion of affordable homes by improving viability.
- The two existing local secondary schools could accommodate limited expansion funded by educational contributions and thus increase their success and the growth and viability of the 6th forms.
- Values realised from the Thomson House School sites could help match re-location costs.
- The site layout, save for the school site, is broadly retained save for reducing the massing of blocks close to the riverside.
- Traffic generation and pupil movement and safety issues are much improved.

This alternative plan (see Appendix 80, is notional at present of course but is of relevance when viewed alongside Section 12.0 of my Proof and the planning balance considered therein.

10.6 Design Scrutiny - Richmond Design Review Panel.

A Design Review was held on 2nd February 2022 with confirmation of the Panel's views issued on 28th February 2022 - (CDC.2). The inter-linked applications A & B were submitted to Richmond Council very shortly afterwards on 17th March 2022.

The panel recognised improvements to earlier designs reviewed on 30th September 2021 but criticised the latest scheme on a number of key areas which are noted as follows:-

- there was scope to refresh parts of the scheme to help with distribution of massing
- the masterplan feels now slightly outdated
- concerns were expressed about overlooking between residential blocks due to the distances between buildings - only 10.0m in places
- concerns highlighted about single aspect units
- the panel felt the scheme is too dense for this area
- the density expressed resonates more with areas in Central London
- the panel expected a different character and density in some parts to mitigate the higher level of density and felt more diverse building footprints were required
- they felt that the use of the mansion block and warehouse typology is both limiting and formulaic - they were not convinced about the success of the mansion block - and said it seemed out of place - elements of delight were missing
- Block 10 on the High Street was too dominant.

Block 10 was reduced by one storey following the Review, but when the scheme was revised to comply with the new fire regulations (requiring a second means of escape in the residential blocks over 18.0m), it returned to the former scale with 5/6 storeys. In most other respects the layout and massing have remained unchanged save for internal planning changes to the residential blocks to comply with the new fire escape regulations.

Consequently most of the comments and criticisms noted above still apply to the appeal proposals and many of these support my own assessments of the design of the proposals.

11.0 The Sports Fields / Secondary School Siting & OOLTI Re-Provisioning

11.1 Siting

No proposals have ever been presented in public consultations or submitted as earlier planning applications locating the secondary school other than on the 2.2ha OOLTI protected sports fields, despite the subject site being 8.60ha (21 acres), in size. The school was shown previously on the western half of the sports fields, and then on the northern pitch, and is now sited on the eastern half of the grass pitches.

The Local Plan (Clause 5.3.6), permits the loss of OOLTI in certain circumstances but provided that the new open area is equivalent or improved in terms of quantum, quality and openness. This is also reflected in the allocation at SA24 which required the “retention and/or retrovision and upgrading of the playing field”. While the supporting text to policy SA24, at page 174, states that “it may be acceptable to re-distribute designated OOLTI within the site” this is subject to the caveat that “the new open area is equivalent or improved in terms of quantum, quality and openness.”

I explain in the following sub-sections why I do not consider this set of conditions have been met.

11.2 Quantum

Richmond have confirmed the existing sports fields OOLTI area as 2.20Ha. To justify the re-provisioning, the open spaces between buildings have been calculated and are considered to be sufficient to qualify as the required quantum, but I would strongly challenge this conclusion. Firstly, any quality environment for a development of this nature would require in the order of 30-40% of the site as open space between buildings, play space, and other green public realm to comply with the National Design Guide, London Plan Policy D8 and Local Plan LP31. Such space is also required to comply with internal daylight/sunlight requirements for the residential accommodation.

Therefore to include these same spaces as re-provisioning of OOLTI is double-counting. I maintain that there is a fundamental flaw in the assessment of quantum re-provisioning in the appeal proposals.

11.2.1

Similarly the Green Link should not be included as re-provisioning as this is a separate requirement of the SPD. (see Appendix 1 in the SPD and Appendix 3- MBCG Plan 1 in this proof). Neither in my view should the areas of hard paving of the Maltings Plaza and the Bottleworks Square be included as OOLTI re-provisioning. They are totally hard paved with just six trees in each space (as indicated on the Gillespies Landscape Masterplan).

The gardens to the terraced townhouse are private and should also be excluded for quantum re-provisioning.

11.2.2

The land reserved for a bus-turnaround in the south west of the existing sports fields should also be excluded, as should the 3G all-weather school sports pitch. The latter is fenced off and requires acoustic blanketing to its perimeter to limit noise disturbance to residents, and is also floodlit.

11.2.3

By my calculation, even including the above “double counted” areas, the total area of re-provisioning is just short of 8,000 sqm and thus only 38% of the required quantum in a series of six individual spaces spread about the site. Most of these areas, save for the Public Pocket-Park (a residue area of the original sports fields), are required to meet good design principles in any case.

(See Appendices 3-7 - MBCG Plans 1-5).

11.3 Quality

11.3.1

Several of the factors noted above also reflect on the quality of the spaces put forward as re-provisioning.

Many of the spaces proposed as re-provisioning are relatively small or are narrow spaces surrounded by tall buildings, very enclosed and semi-private in character being directly overlooked by residential homes. This is especially the case in the spaces between Blocks 2/3 - 7/8 - 11/12 & the slither of open space between the parallel Blocks 13-17 to the west.

Most of these spaces are enclosed by Blocks of 6/7/8 & 9 storeys in height.

Furthermore these spaces are significantly over-shadowed as indicated in Waterman's EA technical report (CDA.82 - ES Addendum Pt 2 Nov 2023 -pages 7-15).

11.3.2

Two of the open spaces are almost exclusively hard surfaced, and others sit above the basement car parking which diminishes surface water retention and attenuation which is provided naturally on the existing grass sports fields.

Other than the Public Pocket Park it is hard to imagine that any of the public open spaces could be considered for designation as OOLTI space applying the five criteria at para 5.4.3 of the supporting text to Local Plan Policy LP 14 (CDE.1). (The Green Link could qualify but is a specific and quite separate requirement in the SPD and Site Allocation).

11.3.3

It is stated in the appeal proposals that the increased sports use with the all-weather 3G pitch, MUGA and schools indoor facilities more than compensate for the loss of the two grass football pitches. This presumes a level of public use of the school's facilities which is by no means guaranteed.

No account has been factored for use of the existing sports fields for cricket, but setting that aside, increased sports use, as advised by Sport England, is a separate issue to the OOLTI re-provisioning requirements of the Local Plan. A fenced and floodlit 3G all weather pitch cannot be viewed as either equal or improved in quality to the visual quality and townscape attributes of 2.2ha of open grass sports fields.

11.3.4

Richmond recently consented the new Turing House School on MOL land at Hospital Bridge Road, Twickenham. Sport England were consulted, and here both were satisfied with a three court MUGA of 55.5 x 37m; and did not insist on a full sized 3G all weather pitch. Such an approach on the appeal site would increase sports use, but would have the added benefit of retaining a much larger area of the existing sports fields.

It seems this alternative approach has not been explored in the Design Evolution process, notwithstanding the questionable need for the school.

11.4 Openness

11.4.1

In my opinion the proposed re-provisioning fails badly in this respect. The existing sports fields measure around 110 x 170m in proportion and act as an important 'gateway' space and its openness allows wide vistas into this precious open green space, the largest in Mortlake. The openness is key to their Townscape Importance. (see para 5.3.7 of the supporting text to Policy LP14).

11.4.2

The provision of six small spaces distributed around the site, surrounded by tall buildings and over-shadowed as a result can hardly be equivalent to, or an improvement upon, the existing 2.2ha single open space so visible to the public from many angles and vistas. The pocket-park is a residue of the existing sports fields with a backdrop of the flood-lit and fenced 3G pitch and school MUGA and is only about 0.3ha in size compared with the existing 2.2ha.

The Green Link is the only other meaningful open space in the appeal proposals and as noted previously, is a specific requirement of the SPD, additional to the retention of the sports fields.

11.4.3

Several of the courtyard spaces proposed as re-provisioning are semi-private in nature being elevated above the towpath and surrounded on their inner faces by bedrooms and other residential space at ground floor level. They are unlikely to be inviting to the public especially given their size and physical enclosure. I do not feel they can qualify in terms of openness.

I am of the opinion that the proposed re-provisioning fails on all three criteria in Local Plan Policy LP14.

Several plans are included in the Appendix (Appendices 3-7), in support of my analysis and opinion.

12.0 Planning Balance & Conclusion

12.1

My Proof of Evidence highlights three specific aspects of the appeal proposals which result in significant harm to the local context, character of the area, and surrounding heritage assets, namely:

- The cumulative density, scale and massing of the masterplan design constitutes an over-development, more a site maximisation rather than optimisation.
- The heights of many of the buildings, particularly those which exceed the maximum height of 7 storeys as defined in the Local Plan.
- The loss of the OOLTI protected sports fields which are not re-provisioned as equivalent or improved in terms of quantum, quality and openness.

12.2

Furthermore, my evidence, together with that of other MBCG witnesses have identified the following harms arising from the appeal proposals, (several of which are recognised by the Local Authority in the Officers' Report to Committee- July 2023 -pg 360 and January 2024- pg 128/129), namely;

- Additional volumes of vehicular traffic onto the only access/egress route serving the appeal site, which is already highly congested, and at times gridlocked.
- Additional risks to the safety of drivers, pedestrians, cyclists, and parents/pupils of the Thomson House Primary School at the Mortlake Station level crossing.
- Attracting additional traffic by virtue of the proposed works at Chalker's Corner.
- Risks to 1,200 pupils and staff having to cross the busy and congested Lower Richmond Road particularly at am peak periods.
- Lack of Affordable homes
- Loss of the OOLTI protected sports fields due to the location of the proposed secondary school which is not justified by predicted school place needs.
- Loss of most of the trees protected by TPO's within the OOLTI sports fields.
- Harms to existing local secondary schools including the long term viability of their respective 6th.form schooling.
- Providing a secondary school site which is very significantly below the minimum site area recommended by the DfE in their Area Guidelines for Mainstream Schools; Building Bulletin 103, (Annex B Site Areas page 44), and the potential for risks to pupils leaving the school site at unregulated times.
- Harms to local residents and the setting of the OOLTI sports fields due to the floodlighting and potential noise emanating from the 3G all-weather sports pitch despite lighting types and acoustic treatment to north and west perimeter fencing
- Harms to heritage assets including the Maltings and the Former Hotel & Bottling Buildings, local Conservation Areas and other local heritage assets on Thames Bank - Harms acknowledged by the Local Authority and detailed in their Statement of Case.
- Harms to key views from Chiswick Bridge and views from the towpath downstream of the appeal site.
- Harms to the historic landscape character and context of the towpath, National Trail and the Thames riverside.
- Urban Greening Factor targets are not met.
- Residential units which are north facing and/or single aspect and which do not meet building standards in terms of light to internal space and amenity areas.
- Adverse effects on neighbouring residential properties in terms of loss of light.
- Increased pressures on services such as health, social services and policing which are already over-whelmed.
- The cumulative density of the appeal proposals result in a built form which in my opinion is wholly out of character with the existing area and as such contravenes the NPPF Para 130.

12.3

As balance to these harms it is acknowledged that there are a number of public benefits embodied in the appeal proposals. These can be summarised as follows, but it should be noted that most of these features are required in any case to accord with the Site Allocation and the SPD.

- Re-generation of a large brownfield site and the removal of industrial process buildings
- A mix of land uses and new employment opportunities are created (note that consent has been granted for permanent filming and associated uses on the site - Application ref - 23/1937/FUL).
- provision of new homes and 65 affordable units
- Increased permeability of the site with new routes to the riverside and a Green Link connecting Mortlake Green with the riverside
- Potential to create a focal area with a mix of flexible use space addressing the Green Link and capable of accommodating retail uses, bars, cafes, restaurants, the cinema etc.
- The Maltings is retained and accommodates new residential units and flexible space. Only the facade of the Former Hotel and Bottling Buildings is retained.
- River related use is included in Block 9, but as noted earlier in item 10.4 there is no firm commitment to use by a rowing club, and the ground floor layout appears inadequate to accommodate such a use.

12.4

The Local Authority have noted other public benefits in their reports to the Planning Committee Meetings held in July 2023 and January 2024 but these should be considered as mitigation measures required directly as a consequence of the appeal proposals.

- Improvements to Mortlake Green
- Financial contributions to improved bus services - (undefined services)
- Financial contributions to Barnes Eagles who currently use the two football pitches on the existing sports fields, covering costs of their re-location and use of alternative grounds.
- Increased sports provisions by virtue of the new secondary school and potential for increased public use of those facilities. (however, there is no guarantee of this due to the questionable viability of running and managing public use by the school).
- Financial contribution to health provisions.

12.5

Several of the harms noted above represent departures from the adopted allocation SA24 of the Local Plan and additional guidance contained in the Planning Brief SPD. In addition, it is understood that the GLA will be presenting evidence which shows that the appeal proposals fail to comply with affordable housing requirement of the SPD.

12.6

In an appeal decision concerning Land to the rear of 20 Wycombe Road, Holmer Green, High Wycombe (CDH.12), Inspector Wilson concluded that conflict with a site allocation policy limited the weight which would be afforded to the benefits of the appeal proposals in circumstances where a policy compliant scheme would also deliver the same benefits:para 56.

In my opinion, the same reasoning can be applied in this case, such that the weight attributable to the benefits of the appeal proposals ought to be limited as a result of the conflict with Policy SA24.

In addition to this general point as to the weight attributable to the benefits of the scheme, I would question the weight attributed by the Appellant to a number of the so-called benefits of the scheme which are noted above in items 12.3 & 12.4.

As a result, it is my view that, on the basis of my evidence and that presented by the MBCG, together with that of the GLA, the WLRG and interested parties, the overall planning balance is in favour of refusing planning permission and dismissing the appeals.

12.0 Appendices - Illustrations & Plans

Appendix 1A - Appeal Proposals - Site Wide Landscape Masterplan - Gillespies.

Appendix 1 - 3D Aerial View from the North East
(This visual has been produced using VuCity 3D modelling software)

Appendix 2 - MBCG Plan - River Thames - Green Space Ribbon - (Putney to Richmond)

Appendix 3 - MBCG Plan 1 -OOLTI & Green Open Space (Required in SPD)

Appendix 4 - MBCG Plan 2 -OOLTI & Green Open Space - (Appeal Proposals)

Appendix 5 - MBCG Plan 3 -OOLTI Re-Provisioning - Quantum (Appeal Proposals)

Appendix 6 - MBCG Plan 4 -OOLTI Re-Provisioning - Quantum/Quality/Openness -
Appeal Proposals

Appendix 7 - MBCG Plan 5 -Comparison - Original OOLTI & Green Link / Appeal Proposals20

Appendix 8 - MBCG - Community Plan.

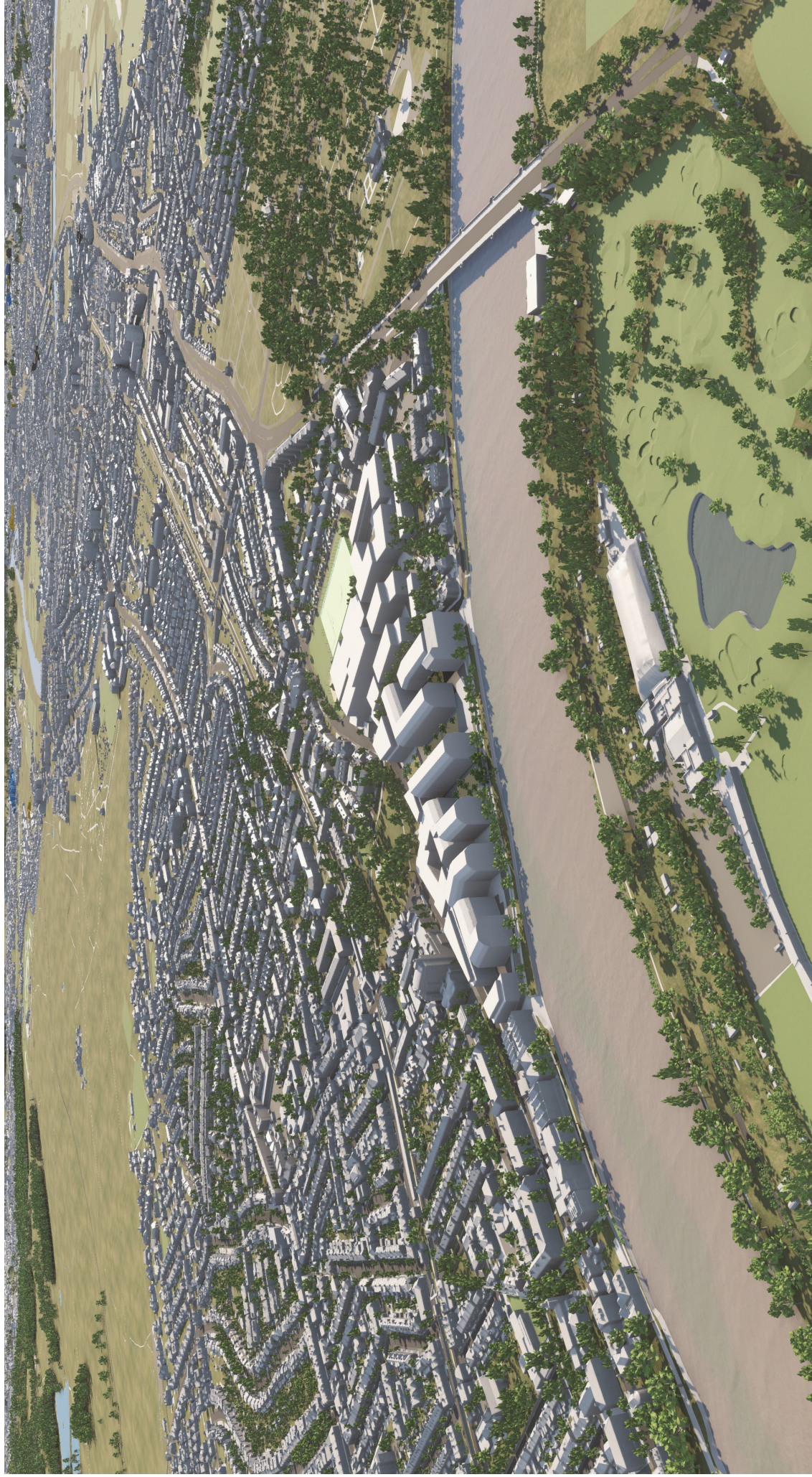
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Drawing Date Proposed		Drawing Scale As Shown	
Drawing Author Proposed		Drawing Date As Shown	
Drawing Title Proposed Site Wide Landscape		Drawing Number P0736-00004-GL-000	
Drawing Date Proposed		Drawing Scale As Shown	
Drawing Author Proposed		Drawing Date As Shown	



STAG BREWERY - MORTLAKE

APPEAL PROPOSALS - SIDE WIDE LANDSCAPE MASTERPLAN



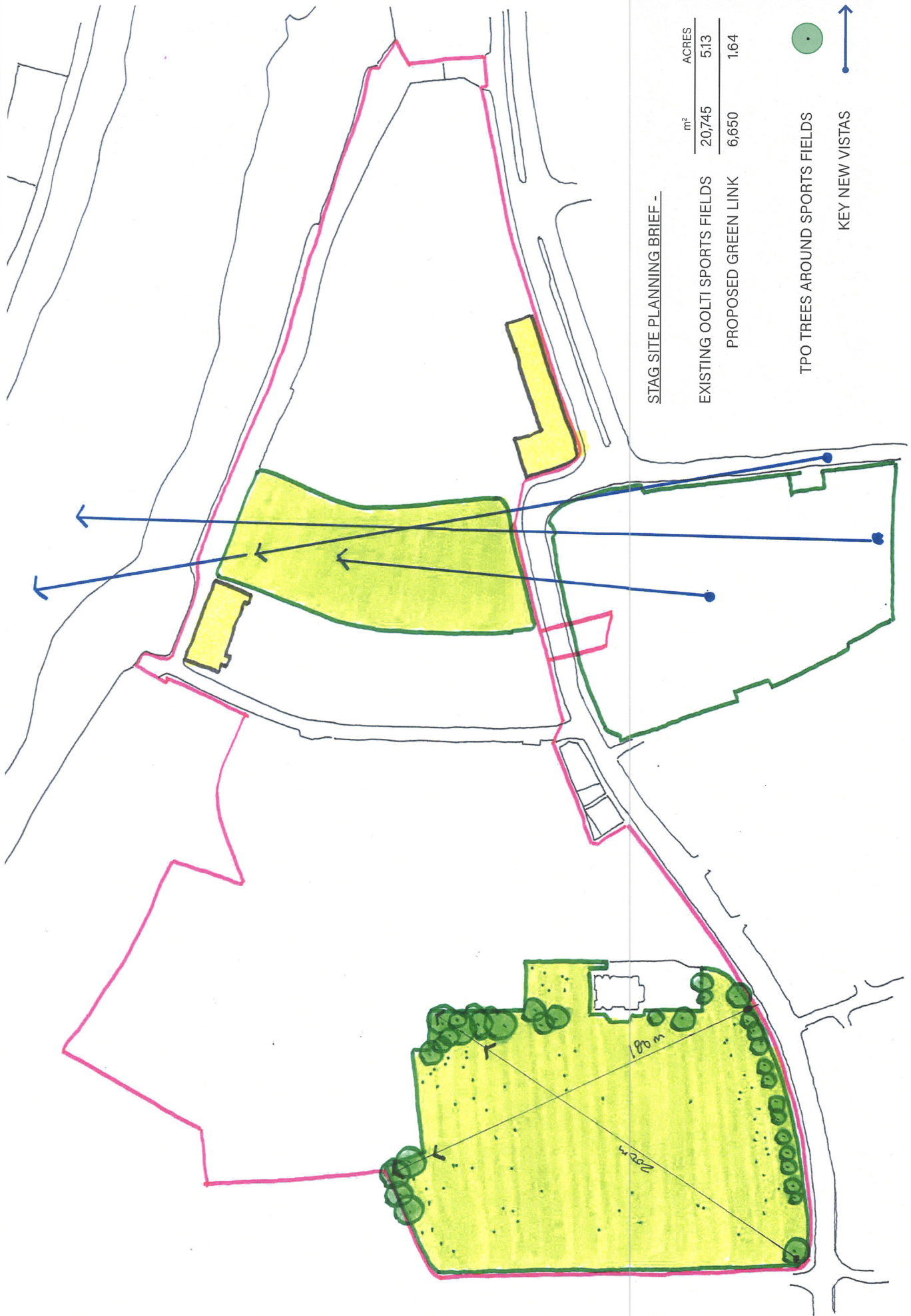
STAG BREWERY - MORTLAKE

AERIAL VIEW FROM THE NORTH-EAST



STAG BREWERY - MORTLAKE

RIVER THAMES - GREEN SPACE RIBBON (PUTNEY TO RICHMOND)



STAG SITE PLANNING BRIEF -

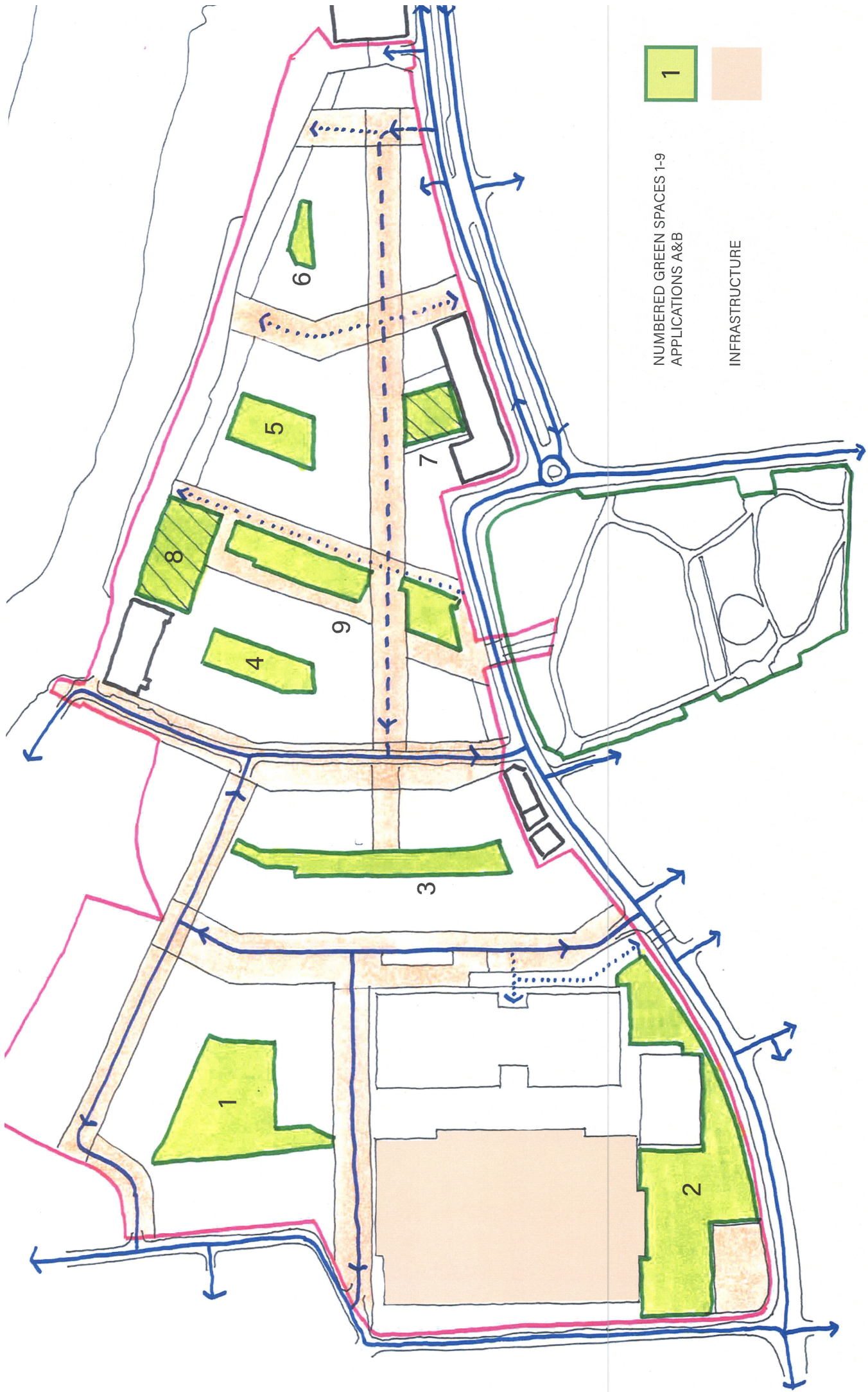
	m ²	ACRES
EXISTING OOLTI SPORTS FIELDS	20,745	5.13
PROPOSED GREEN LINK	6,650	1.64

TPO TREES AROUND SPORTS FIELDS

KEY NEW VISTAS

STAG BREWERY - MORTLAKE

OOLTI & GREEN OPEN SPACE (REQUIRED IN SPD)



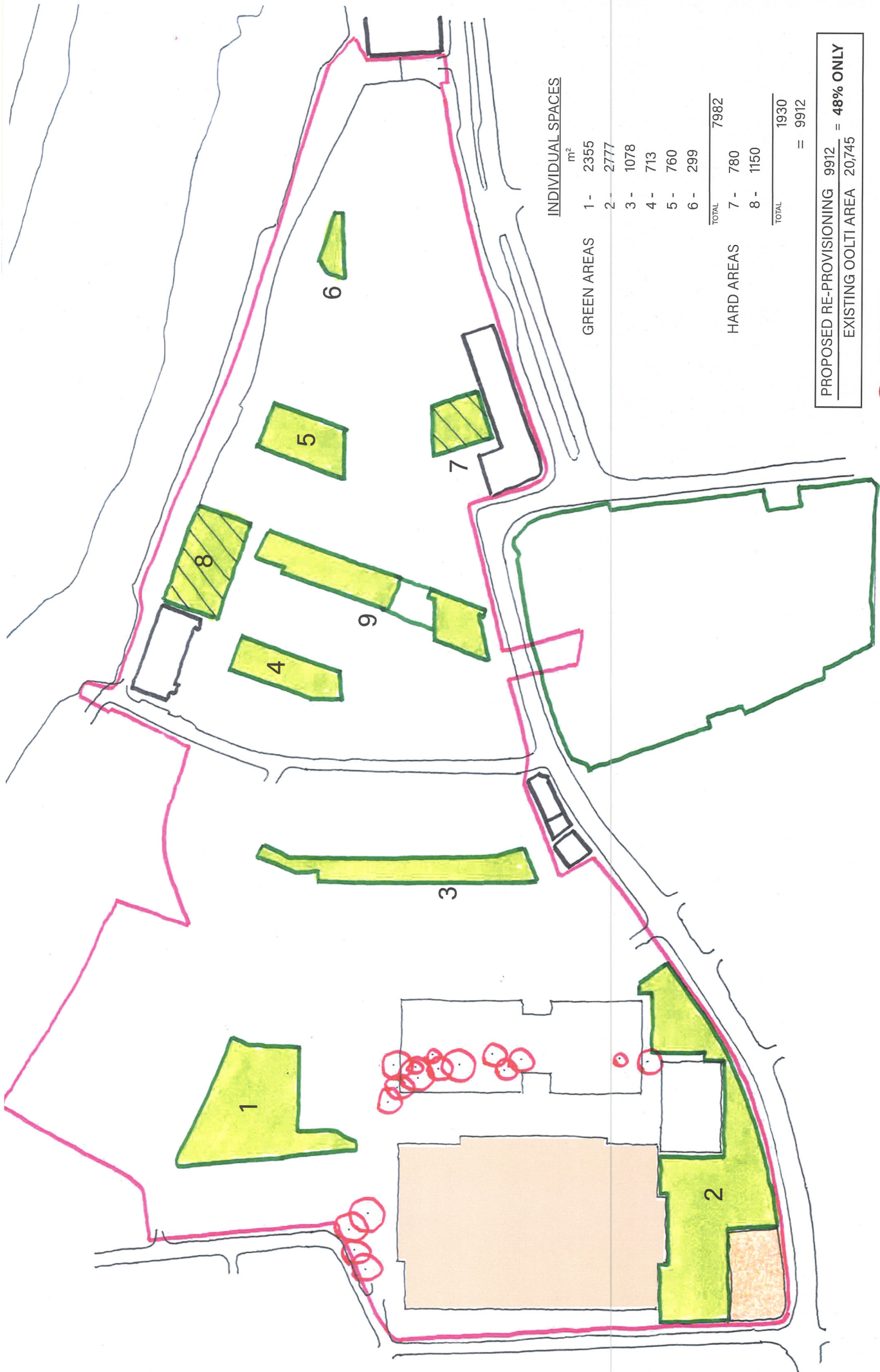
NUMBERED GREEN SPACES 1-9
APPLICATIONS A&B

INFRASTRUCTURE



STAG BREWERY - MORTLAKE

OOLTI & GREEN OPEN SPACE



INDIVIDUAL SPACES

GREEN AREAS	m ²
1 -	2355
2 -	2777
3 -	1078
4 -	713
5 -	760
6 -	299

TOTAL 7982

HARD AREAS

7 -	780
8 -	1150

TOTAL 1930

= 9912

PROPOSED RE-PROVISIONING 9912 = 48% ONLY
EXISTING OOLTI AREA 20,745

○ TPO TREES
REMOVED

STAG BREWERY - MORTLAKE

OOLTI RE-PROVISIONING - QUANTUM



INDIVIDUAL SPACES
SHADOWING IMPACT

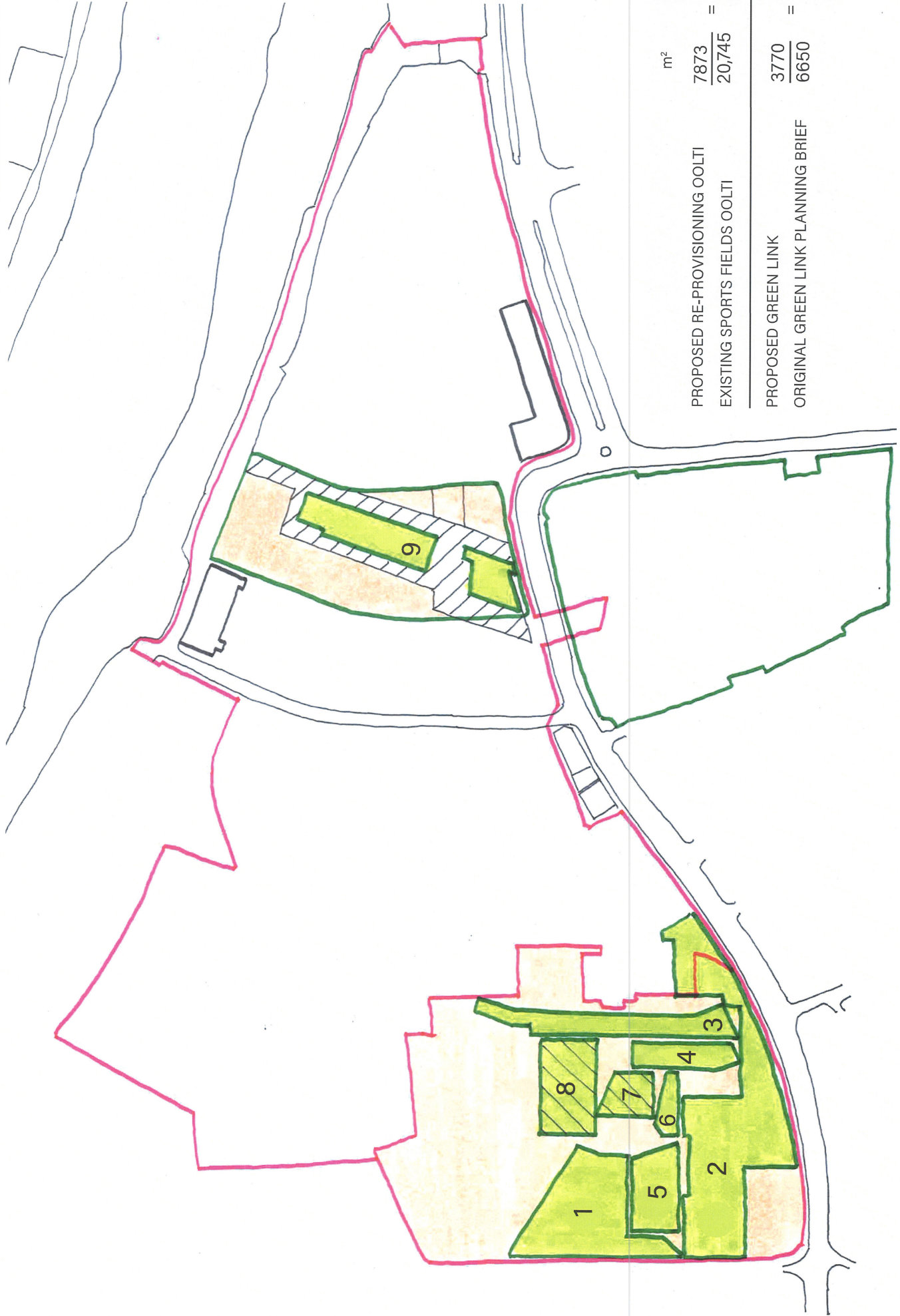
	m ²		
GREEN AREAS	1 -	2355 - 650	= 1705
	2 -	2777 - NIL	= 2777
	3 -	1078 - NIL	= 1078
	4 -	713 - 423	= 290
	5 -	760 - 572	= 188
	6 -	299 - 199	= 100
TOTAL			6138
HARD AREAS	7 -	780 - 115	= 665
	8 -	1150 - 80	= 1070
TOTAL			7873

RE-PROVISIONING	m ²
LESS AREAS IN SHADOWING	7873
ORIGINAL AREA	20,745
	= 38%

STAG BREWERY - MORTLAKE

OOLTI RE-PROVISIONING: QUANTUM
QUALITY
OPENNESS



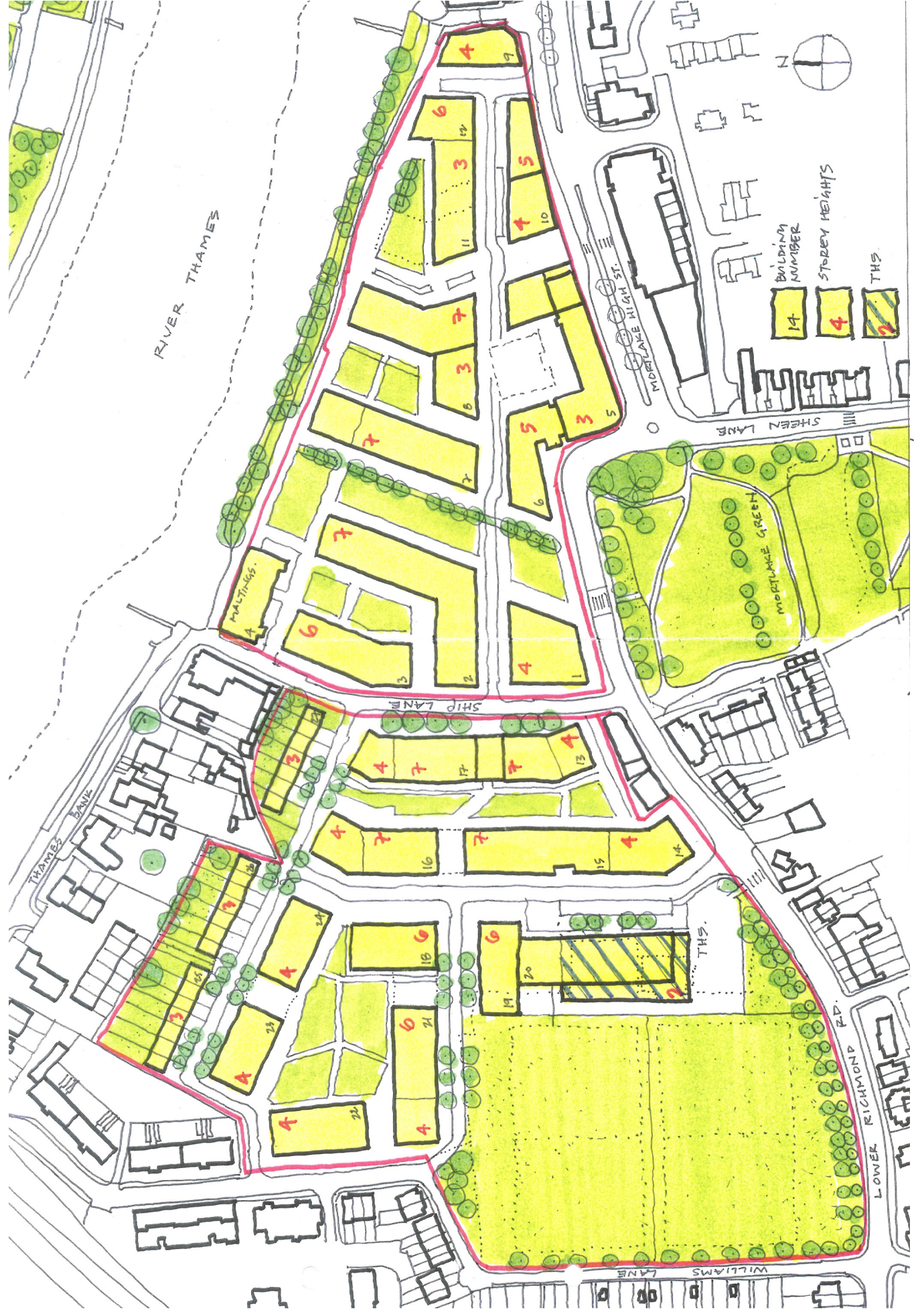


PROPOSED RE-PROVISIONING OOLTI	m ²	
EXISTING SPORTS FIELDS OOLTI	$\frac{7873}{20,745}$	= 38%
PROPOSED GREEN LINK	$\frac{3770}{6650}$	= 57%
ORIGINAL GREEN LINK PLANNING BRIEF		

STAG BREWERY - MORTLAKE

COMPARISON - ORIGINAL OOLTI + GREEN LINK
& APPEAL PROPOSALS





STAG BREWERY - MORTLAKE

MBCG COMMUNITY PLAN