

Ella Sanders Smith

12th May 2018

London Borough of Richmond Upon Thames (LBRuT),
Environment Directorate
Planning Department

RE: Response to the following linked planning applications (each, an **Application**):

1. **18/0547/FUL (Main site – detailed and outline)**

http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0547/FUL

2. **18/0548/FUL (Secondary school)**

http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0548/FUL

3. **18/0549/FUL (Chalker's Corner works)**

http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0549/FUL

Please refer to the glossary at the end of this document for defined terms.

Dear Sir / Madam

1. **Background**

I am a resident of Williams Lane, Mortlake (SW14) and live immediately adjacent to the Site. I am responding as the 'Community Liaison Group' (CLG) attendee advocating (on an ad hoc, informal basis) the views of a group of Williams Lane & Wadham Mews residents (the **Group**). I previously attended the Applicant's five CLG sessions held in 2017 and 2018 in this capacity.

As far as I am aware, this statement represents the general consensus of the Group's views on the Applications. However, this response is strictly supplemental to any individual responses (including my own) that members of the Group may wish to make and should be read accordingly. This response is made in relation to all relevant aspects of each Application.

The Group moved into the 2011 Development upon construction in December 2011, following adoption by LBRuT of the APB, which itself followed a site-specific consultation. We relied heavily upon LBRuT's then freshly-adopted APB in making an investment and life decision to move here just 6 years ago. The 2011 Development is shown in the APB Scale and Uses Plan as the 'Approved residential development'. The 2011 Development comprises some 17 houses and 64 flats, approximately 170 residents.

The Group requests that appropriate weight be given to the responses set out below as residents directly affected by the proposed development.

The proposed development, if insensitively pursued, could blight the lives of the residents both during the construction phase and for many years to come, whilst permanently depriving the existing community and future generations of key assets that currently make Mortlake and its environs an attractive, green, sub-urban, riverside location.

2. **Opposition to all Applications**

2.1. The Group is generally supportive of the Plans in a number of respects – see further paragraph 2.4 below. However, it has a number of key concerns. Accordingly, on the assumption that these issues will not be satisfactorily resolved at this stage, we must **object** to the Plans in their present form and accordingly **oppose all three Applications**.

2.2. Our key concerns and reasons for objection (applicable to a greater or lesser extent to each Application) are as follows:

- (a) primarily as a function of its particular physical characteristics, the Site **cannot sustain** both a large school and high-density residential occupation. Key factors in reaching this conclusion are:
- (i) **already-excessive and poorly functioning traffic flow;**
 - (ii) consequent emissions of noxious gases exceeding legal levels in an AQMA; and
 - (iii) a strain on local infrastructure and key services that in some cases are already creaking or inadequate – notably public transport, health care, and primary and nursery educational provision,

which will be exacerbated by the cumulative effect of what is proposed and which have **not been adequately mitigated** by the measures set out in the Plans;

- (b) in relation to overall density, the APB was founded on the basis of community support for a **lower-density** development: what is proposed, at 897 units, in addition to the large secondary school, is anything but lower density, being:
- (i) more than **double** the range proposed in the community-preferred APB Consultation Materials appended (390 units);
 - (ii) more than **double** the level of a comparable, recent and local development (Queen Mary's, Roehampton)¹ – despite that site having better transport connectivity (equivalent per-hectare yield of c.440 units);
 - (iii) (acknowledging the short-comings of a purely matrix-based approach), approximately **triple** the level that the GLA matrix would provide as appropriate for a site which is 'predominantly suburban'² (c.296 units) and an average PTAL of 2 and even almost **double** that applicable to an urban site of that PTAL (c.493 units)³; and
 - (iv) more than **triple** the level of provision the Borough identified as appropriate in its Monitoring Report on Housing effective at the time of acquisition of the Site by the Applicant (200 to 300 units), and still 50 per cent. in excess of the revised total proposed by LBRuT in July last year following LBRuT's discussion with the developer (500 to 600 units).

Accordingly, residential density (in whatever form it may take) at the proposed levels is grossly excessive and simply **must be reduced** to be sustainable in this particular locale, especially if sitting alongside the Proposed Secondary School;

- (c) **however**, given the demonstrable (and increasing, per the Draft London Plan) need for new homes (including affordable supply) in the Borough, the concerns expressed below and independently supported around long term demand for the secondary school, as well as **the clear need for a primary school to serve existing pupils** (as identified in the 2015 Cabinet Papers, and see further below), not to mention the many new primary-school age pupils who will become resident on the Site, a **two-form entry primary school (as per the APB) should be constructed rather than the Proposed Secondary School**.

¹ <http://weharmart.co.uk/wp-content/uploads/2015/03/Housing-density-study-opt.pdf>

² Cited from LBRuT commissioned paper on density, full reference below.

³ Based on current London Plan matrix mid-points and 3.1-3.7 hr/units.

- (d) the EIA confirms what many local parents (including those in the Group) already know in this regard: there are already insufficient primary school places to satisfy local need and parent choice requirements under s.14 and s.14A of the Education Act. If one factors in the impact of the development, this would see many local families in Mortlake, Sheen and Barnes displaced out of catchment for the outstanding primary schools that currently serve these areas, such as Thomson House and St. Mary Magdalen's – necessitating round daily journeys (often vehicular) of up to 15km to Lowther or Darell. The NPPF is very clear that local primary education is a key point to consider in any development – a 4 year old pupil simply cannot attend a primary school unaccompanied, and walking over vehicular transport (and emissions) is to be encouraged;
- (e) the Group is alarmed at the lack of transparent process, and lightweight evidence base, pursued by LBRuT in taking the decision to dispense with a primary school in the face of clear demand data, without consultation, to reverse a key element of the APB and considers that material factors in the evaluation of alternative sites, and in the matching of LBRuT demand and supply, have not been properly considered – see further below;
- (f) in any event, the Proposed Secondary School is not supportable in its present form: it appears a clear case of quantity over quality⁴, cramming an excessive number of pupils into a building based on ESFA's bare minimum inner-city design, in a known pollution hotspot, with a single playing field for 1,200 young people – LBRuT owes a duty of care to pupils and its staff. Being situated as it is at the edge of the Borough, at this size LBRuT would be powerless to prevent out-of-Borough pupils attending from Hounslow and Hammersmith, to the detriment of LBRuT demand and the LBRuT taxpayer⁵. In contrast, a high-quality three-form entry secondary school, serving the local communities of Mortlake, Sheen, Barnes and Kew that will bear the burden of the school, would in principle be acceptable to the majority of the Group as an alternative to a primary school; in no case is the huge Proposed Secondary School supported in its present form;
- (g) consequently, before adoption of any proposed school – primary or secondary – there needs to be a much more detailed, publicly-available, independent assessment of:
- (i) the projected local supply and demand, based on appropriate and reasonable assumptions (e.g. local demographics, impact of Brexit, percentage of pupils leaving state education in LBRuT) to ensure there is minimal risk of empty classrooms here or elsewhere in LBRuT as a result of such decision. For instance, we understand the Richmond Park Academy sixth form currently only takes 35 pupils – with a large, new sixth form that may fall further still, despite currently having capacity; and
 - (ii) (only if that reveals a projected shortfall at primary or secondary level) of all the available options for extension of existing sites or use of new sites to satisfy such projected shortfall – including Barn Elms for a secondary school – based on all material factors, to include:
 - (A) accessibility – not artificially limited to 'east of the Borough' and 'west of the Borough', which disregards the realities described above;
 - (B) financial viability and availability of ESFA-funding;
 - (C) anticipated catchments (including post-development of the Site);
 - (D) anticipated use of LBRuT facilities by out-of-Borough pupils;
 - (E) a proper legal assessment of s.14/s.14A duties and the NPPF specific requirement for primary place provision in particular;

⁴ The Proposed Secondary School would have approximately 35 per cent. more pupils, in approximately 35 per cent. less space, than the LBRuT average.

⁵ The PBA Report assumes 30 per cent. of pupils will travel in from these areas.

- (F) planning protections (especially to identify land which does not carry protection for a suitable size);
 - (G) complementary proximate facilities, such as running tracks, sports grounds;
 - (H) impact on the local area – in particular, on traffic, noxious gas emissions⁶ (especially in the context of LBRuT being an AQMA and specific areas identified as requiring emissions to be tackled to meet legal obligations), public transport, loss of green space, existing catchment areas to minimise displacement (cf. s.14A duty), wider infrastructure, residents and opportunity cost for development of the relevant site for use in other ways; and
- ~~(I) any other material relevant factors, such as statutory consulted opposition (e.g. Network Rail in view of level-crossing),~~

followed by a specific consultation exercise. Based on the scant evidence base offered to date by LBRuT, this exercise has not been done properly; the decision-making process so far – after the initial consultation process which resulted in the adoption of the APB requiring a primary school on-site – has been incredibly opaque and any future process must be more transparent;

- (h) the North-Western Residential Zone:
 - (i) is far too dense, with long, wide blocks (in particular the WL Residential Block);
 - (ii) is of too great a scale relative to the scale of the existing site in that area and the clear requirements of the APB and the APB Consultation Materials (40-50 units per hectare, as annexed, cf. an estimated 130 to 170 units per hectare here – over triple the density); and
 - (iii) (in outline form at least) frankly resembles an over-bearing 1960's ghetto – the opposite of what the APB sought to achieve. It is not permeable and has no evident design features to make it any less imposing, such as a set-back roof. It would benefit from being punctuated by the occasional A1 (shops and retail outlets) and/or A3 (food and drink) uses;
- (i) the WL Residential Blocks must not be four-storey high blocks of flats: they should:
 - (i) include houses (where houses are currently found opposite to reflect the existing urban grain, the APB and the APB Consultation Materials), as well as flats – the APB does not require these all to be located behind Thames Bank, they should be dispersed to reflect the existing local area. Indeed, the Applicant's own CLG presentation 2, which showed its interpretation of the APB, shows houses beside Williams Lane; and
 - (ii) be of two and three storeys in height for compliance with the APB (both the APB Scales and Uses Plan and the text, which includes a requirement for the height to diminish towards the perimeter), the Village Plan, and the Local Plan, as well as the NPPF to the extent the units will fall on a part of the site where no buildings are currently sited;
- (j) as a function of (i) increasing scale of the WL Residential Blocks to between 4 and 6 levels and (ii) the WL Residential Blocks encroaching on the 2011 Development, instead of being set back from Williams Lane by approximately 2.5 metres as the existing buildings are at present, the Plans pose material issues of:

⁶ The clear direction of travel is to mitigate the impact of emissions on pupils, let alone siting a new school in a known pollution hotspot. See, for example: <https://www.london.gov.uk/press-releases/mayoral/mayors-air-quality-audits-to-protect-london-kids>

- (i) significant loss of daylight and sunlight, as evidenced by the Waterman EIA annex⁷;
- (ii) overshadowing; and
- (iii) loss of privacy,

in each case relative to the footprint of existing non-residential buildings on the Site, and that are inadequately addressed by the Plans and the EIA. A 'buffer' and additional amenity space, proposed by the Applicant to mitigate the impact of these factors, and included in the March Exhibition plans, do not feature in the submitted Plans. Obtrusive light pollution from floodlighting (see below) also remains a concern notwithstanding the EIA concluding obtrusive light will not reach neighbouring houses;

- (k) affordable housing must not be concentrated in any one area, in particular the North-Western Residential Zone adjacent to which can already be found an existing high concentration of affordable housing at Reid Court, Combe House and part of the 2011 Development. Failure to ensure, in accordance with the NPPF and the London Plan, that it is sensitively incorporated into and across the Site will result in the creation of a ghetto that may ultimately contribute to greater deprivation, a lack of social mobility and greater long-term cost to LBRuT and the taxpayer. It would also disproportionately affect residents of the 2011 Development and neighbouring roads. Further, the affordable housing should include 20 per cent 'affordable rented' – aimed primarily at key workers – in lieu of 20 per cent. of the 'social rented' allocation and in addition to the 20 per cent. intermediate allocation, to ensure the Development is able to attract key workers and to improve the financial viability analysis (allowing fewer units overall);
- (l) the quasi-total loss of grass, and the loss of one entire playing field, on the existing playing fields is strongly opposed and should be resisted by LBRuT on the basis that:
 - (i) the APB expressly provides for the retention and enhancement of the playing fields for football and/or cricket (noting that only recently were the bowling greens removed to allow construction of the 2011 Development);
 - (ii) the land in question is designated OOLTI, and the criteria for 're-provisioning' (i.e. quantum, quality and openness) of the land removed have very clearly not been satisfied – for instance, a bus park is not OOLTI;
 - (iii) 3G and MUGA are not satisfactory replacements for grass for a whole host of reasons: what it offers to the natural habitat and the ecosystems it supports (which interact closely with those at the nearby river-side, something not adequately addressed by the Waterman EIA), the flood prevention characteristics in a Level 2 flood risk zone and what it contributes to the 'green' character of the area – this is different to the analysis where concrete land is being built on, we already have grass here;
 - (iv) the London Plan, Draft London Plan, Development Masterplan, Draft Local Plan, and the NPPF all place significant value on provision of sporting facilities: the loss of 50 per cent. of the simultaneous playing capacity in Mortlake at peak times simply cannot be supported by LBRuT. Sport Richmond would welcome an alternative of retaining pitches of reinforced grass;
 - (v) retaining two reinforced grass playing fields would offer a similar (and acceptable) use capacity case as one floodlit 3G pitch, and lower on-going financial expense to maintain;
 - (vi) playing fields (and green spaces generally) provide a focal point for a community and the positive effects that such spaces can have on health and well-being are well-researched and well-documented (see, for example, the

⁷ At 18.138: "As would be expected with a Development of this scale, there are isolated significant effects to the neighbouring residential properties." The detailed data included at Appendix 18.2 reveal a 40 per cent reduction in VSC and a 62 per cent reduction in NSC to ground floor habitable rooms at 2 - 6 Williams Lane. This is well beyond what is acceptable.

very recent 'Fields In Trust' survey). Enhancement of green spaces for educational facilities marks a clear direction of travel in policy terms⁸;

(vii) the floodlights, netting and barriers that will doubtless be introduced (though not shown on the plans) will be an eye-sore, and the obtrusive light will potentially ruin the important view from Chiswick Bridge towards the Site – an important vista, but which does not appear to have been considered by the EIA;

(viii) the playing fields have archaeological and historical value, being situated as they are to the south of the site of Cromwell House (which site will fall beneath Building 18) and the pitches reportedly having been used by the successful England 1966 World Cup team to train; and

(ix) the 'pocket park' is of questionable value; being situated as it is beside a main road, in the middle of a known pollution hotspot and next to a large school where pupils may congregate and encourage anti-social behaviour. Do we really want to encourage children to play informal ball games immediately beside a main road?;

(m) parking in the vicinity of the North-Western Residential Zone and on Williams Lane has not been adequately addressed. As a minimum we would expect to see the introduction of a CPZ (with passes and visitor passes made available to existing Group residents) to mitigate the impact that car usage by new residents will have on neighbouring residences. In a sub-urban setting such as this with extremely low PTAL (being 1 beside the North Western Residential Development), levels of car ownership by necessity exceed those proposed of 0.7 cars per unit. Provision should be one car per unit (per the APB), and significantly more than 15 parking spaces should be provided for school staff, sixth-form pupils and visiting sports teams; and

(n) (albeit of secondary concern) the use of the red brick is frankly not especially attractive or in-keeping with London brick from the Village Plan – the two local Berkeley Homes developments at Chiswick Gate and Brewery Gate, Twickenham are good examples of what would be more palatable.

2.3. The Group would also comment that, unless and until a viable, sustainable, fully-financed and integrated transport plan has been devised for the Site and the surrounding area, it is hard to see how the Borough can contemplate approving any material development? The Applicant's advisers have continually laid the responsibility for transport at the feet of the Borough, TfL, South Western Railways and Network Rail. That may or may not be correct. But irrespective of that, until transport connectivity (critical to site capacity under both the London Plan and the Draft London Plan) – and the consequent impact on vehicular emissions - are addressed, the Plans cannot properly be approved in their current form. For instance, due consideration should be given to extending the 22 and 219 bus services through Mortlake to Kew and/or Richmond, as well as whether river transport can be introduced. Consideration should also be given to introducing a 'fast' or 'semi-fast' service from Mortlake to Vauxhall and London Waterloo (as we understand used to be the case) in view of the significant increase in user-base over the last ten years and anticipated through the Plans.

2.4. Save where inconsistent, the Group also supports the position put forward by the MBCG.

2.5. For the record, the Group is particularly supportive of the following aspects of the Plans:

(a) the location of the Proposed Secondary School (if not the school itself, and provided all efforts should be made to incorporate mitigants that avoid a congregation of pupils around the school);

(b) limiting the Proposed Secondary School to three storeys in height (albeit the APB proposed a school of two storeys), but the roof top use should be opposed on the basis of loss of privacy to neighbouring residences;

(c) retention of the mature trees (which benefit from TPOs) to the north of the playing fields;

⁸ <https://www.tes.com/news/ps10m-put-aside-nature-friendly-schools>

- (d) making the main entrance to the Proposed Secondary School to the east and making the road to the north of the Proposed Secondary School a 'service road' with emergency-vehicle only access, with raisable bollards, in each case to reduce the impact on existing residences;
 - (e) the provision of at least some green and amenity space on the Site (including the 'Green Link' and the garden courtyards) and the retention of as large an open surface area of the playing fields as possible as grass (albeit not sufficient to override the OCLTI protection);
 - (f) heights of buildings diminishing towards the perimeter of the Site in line with the APB (albeit not sufficiently to be compliant as regards the WL Residential Blocks);
 - (g) improvements to Williams Lane and the introduction of a new, wide pavement on the east of Williams Lane beside the playing fields;
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- (h) widening Williams Lane to the north of the playing fields in places (though this must not encroach on the playing fields nor cause disruption to those residences that border this area);
 - (i) basement parking provision;
 - (j) the mix of uses incorporated and the locations for those uses;
 - (k) incorporating a square/open space on the central / eastern part of the site large enough to accommodate periodical and seasonal attractions such as a farmer's market, an ice-rink or low-key entertainment events;
 - (l) giving community access to the Maltings Building, though this should be two floors including on the second floor a café/restaurant/bar that can take advantage of riverside views and be available for community hire – see further the MBCG's comments; and
 - (m) opening up the riverside to the public and introducing new elevated pathways less liable to becoming submerged at high tides.
- 2.6. Applicant section 106 contributions and CIL should be made publicly available and be rigorously pursued by LBRUT planning. However, and this is important, this revenue MUST NOT be used as a means for LBRUT to satisfy itself as to adequate future supply of key facilities and services, such as nursery and primary education and healthcare provision – as LBRUT itself has acknowledged, there are not the available sites in the vicinity to provide these, so on-site provision is essential. If this means a reduction in density, so be it.
- 2.7. Planning conditions should include a restriction on transfer of all or part of the Site by the Applicant for a period of at least 10 years.
- 2.8. Planning conditions should require the Applicant (and the Applicant shall be required to procure that its employees, sub-contractors any other people acting under or for it) to:
- (a) limit the working hours on the site to 9am to 4.30pm, weekdays only;
 - (b) use only constructors registered with the 'Considerate Constructors' scheme;
 - (c) keep noise to a minimum, including through the use of all reasonable mitigation techniques – a number of people living here work from home or have young children who sleep during the day;
 - (d) keep dust and other particle dispersion from the site to a minimum, again including through the use of all reasonable mitigation techniques – a number of people living here suffer from respiratory problems;
 - (e) offer each local resident the option of twice annual cleaning of all external affected by the site development during construction and a 'deep-clean' of all affected residences at the end of construction;
 - (f) ensure access to the Site is almost exclusively via the Lower Richmond Road (or the river) and not via Williams Lane, which is too narrow and runs too close to existing residences / protected trees and green space to accommodate large or heavy vehicles; and

- (g) give local residents at least one week's notice of the time of any works that might reasonably be expected to be particularly disturbing or exceptional, demolition works being the prime example.
- 2.9. Judgement is reserved on the detailed elements of matters for which approval is presently sought only in outline. In particular, in relation to the design, layout and appearance of the North-Western Residential Zone.
- 2.10. In relation to community consultation, as communicated to the Applicant's advisors on a number of occasions throughout the CLG process, comments submitted on behalf of the Group in the CLG sessions, and more generally, have not been given proper consideration. There was very much a feeling of 'form over substance' to some of the sessions. In some cases, positive aspects of the scheme supported by the Group, or which the development team undertook to include, have even been reversed. For instance, the WL Residential Units were reduced to three storeys – as they should be at a maximum – for the July exhibition, but following that, without any community feedback we're aware of requesting this, they were then increased to four storeys. Another example is the removal of amenity space beside Williams Lane proposed at the March exhibition. We have also consistently commented on the need to allocate affordable housing across the site. Notwithstanding this, the Group does note that, after many requests from across the community, the Proposed Secondary School was moved to the location shown in the Plans, which was welcomed.
- 2.11. LBRuT (with expert assistance, where required) should scrutinise the viability data and site management proposals in order to be confident that the development will be self-financing, with high servicing standards, even in a stress-tested scenario such as Brexit. We cannot have a situation where the development falls into disrepair with inadequate provision for maintenance and key services such as pavements, lighting and security. Contingency funds and credit support from the Applicant should be sought.

3. **Final comment**

There remains a fantastic opportunity to develop the Site in accordance with the terms and objectives of the APB which the Group (literally) bought into and in so doing to create a new village heart for Mortlake. These will deliver sustainable development for Mortlake and the wider Richmond Borough. Residents entirely recognise that the Borough faces competing demands requiring an analysis of complex facts and difficult decisions. However, that does not mean we should collectively accept what is quite clearly at present a sub-optimal solution.

4. **Heads of objections**

The Group's responses contain objections and observations in respect of the Applications under the following heads:

- (a) Overshadowing
- (b) Loss of daylight and sunlight to habitable rooms
- (c) Overlooking / loss of privacy
- (d) Inadequate parking
- (e) Overbearing nature of proposal
- (f) Loss of trees and loss of ecological habitats
- (g) Design and appearance
- (h) Layout and density of buildings
- (i) Effect on listed buildings and conservation areas
- (j) Access
- (k) Traffic generation
- (l) Noise and disturbance from the proposed development
- (m) Public visual amenity
- (n) Flood risk

Glossary

Term	Description
2011 Development	The residential development completed in 2011 comprising 17 houses and some 64 apartments at Williams Lane and Wadhams Mews, SW14
2015 Cabinet Papers	The minutes relating to and other documents (including the Richmond Council Revised School Place Planning Strategy 2015-2024) prepared for the LBRuT Cabinet meeting on 15th October 2015
3G Pitch	The proposed 3G artificial full-sized playing field shown in the Plans occupying part of the two grass playing fields
APB	The adopted planning brief for the Site from 2011, a supplementary planning document
APB Consultation Materials	The consultation papers (including the questionnaire and indicative land-use options) relating to the "Barefoot Consultation - Future of Stag Brewery and related areas 2010" carried out by LBRuT as a prelude to the APB. A copy of the preferred 'lower density' residential option referred to in the final APB is annexed.
APB Scale and Uses Plan	The proposed design for the Site, including maximum acceptable scale of buildings, set out at Appendix 1 to the APB
Applicant	Reselton Properties Limited
Application	Has the meaning given to that term at the start of this letter.
AQMA	An 'Air Quality Management Area', designated pursuant to Part IV of the Environment Act 1995
Borough, or LBRuT	The London Borough of Richmond upon Thames
Development Masterplan	LBRuT's current 'Adopted Development Master Plan'
Education Act	Unless otherwise stated, the Education Act 1996
EIA	The Environmental Impact Assessment relating to the Applications (including its annexures), required pursuant to The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011
Local Plan	The local plan, in its current form on the Borough website pending adoption, further revision and replacement, which will supersede the Development Masterplan
MBCG	The Mortlake Brewery Community Group
MUGA	The proposed 'Multi-Use Games Area' shown in the Plans occupying part of the two grass playing fields
North-Western Residential Zone	The area of the Site occupied in the Plans by Buildings 18, 19 and 20
NPPF	The National Planning Policy Framework, a material consideration in relation to planning applications pursuant to Sections 19(2)(a) and 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990

OOLTI	'Other Land of Outstanding Townscape Importance', a designation afforded by the Development Masterplan and the draft Local Plan
Plans	The detailed proposals for the Site set out in the Applications to which these comments relate.
Proposed Secondary School	The secondary school the subject of Application 18/0548/FUL
Site	The Stag Brewery development site, identified as SA24 in the Local Plan
WL Residential Blocks	That part of the North-Western Residential Zone identified in the Plans as Building 18.

Schedule

Developer's analysis of building heights relative to APB



Planning app scale versus APB.pdf

Ella Sanders Smith

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- (i) more than double the range proposed in the community-preferred APB Consultation Materials appended (390 units);
 - (ii) more than double the level of a comparable, recent and local development (Queen Mary's, Roehampton)¹ – despite that site having better transport connectivity (equivalent per-hectare yield of c.440 units);
 - (iii) (acknowledging the short-comings of a purely matrix-based approach), approximately triple the level that the GLA matrix would provide as appropriate for a site which is 'predominantly suburban'² (c.296 units) and an average PTAL of 2 and even almost double that applicable to an urban site of that PTAL (c.493 units)³; and
 - (iv) more than triple the level of provision the Borough identified as appropriate in its Monitoring Report on Housing effective at the time of acquisition of the Site by the Applicant (200 to 300 units), and still 50 per cent. in excess of the revised total proposed by LBRuT in July last year following LBRuT's discussion with the developer (500 to 600 units).

Accordingly, residential density (in whatever form it may take) at the proposed levels is grossly excessive and simply must be reduced to be sustainable in this particular locale, especially if sitting alongside the Proposed Secondary School;

- (c) however, given the demonstrable (and increasing, per the Draft London Plan) need for new homes (including affordable supply) in the Borough, the concerns expressed below and independently supported around long term demand for the secondary school, as well as the clear need for a primary school to serve existing pupils (as identified in the 2015 Cabinet Papers, and see further below), not to mention the many new primary-school age pupils who will become resident on the Site, a two-form entry primary school (as per the APB) should be constructed rather than the Proposed Secondary School.

¹ <http://websitesmart.co.uk/wp-content/uploads/2015/03/Housing-density-study-opt.pdf>

² Cited from LBRuT commissioned paper on density, full reference below.

³ Based on current London Plan matrix mid-points and 3.1-3.7 hr/units.

- (d) the EIA confirms what many local parents (including those in the Group) already know in this regard: there are already insufficient primary school places to satisfy local need and parent choice requirements under s.14 and s.14A of the Education Act. If one factors in the impact of the development, this would see many local families in Mortlake, Sheen and Barnes displaced out of catchment for the outstanding primary schools that currently serve these areas, such as Thomson House and St. Mary Magdalen's – necessitating round daily journeys (often vehicular) of up to 15km to Lowther or Darell. The NPPF is very clear that local primary education is a key point to consider in any development – a 4 year old pupil simply cannot attend a primary school unaccompanied, and walking over vehicular transport (and emissions) is to be encouraged;
- (e) the Group is alarmed at the lack of transparent process, and lightweight evidence base, pursued by LBRuT in taking the decision to dispense with a primary school in the face of clear demand data, without consultation, to reverse a key element of the APB and considers that material factors in the evaluation of alternative sites, and in the matching of LBRuT demand and supply, have not been properly considered – see further below;
- (f) in any event, the Proposed Secondary School is not supportable in its present form: it appears a clear case of quantity over quality⁴, cramming an excessive number of pupils into a building based on ESFA's bare minimum inner-city design, in a known pollution hotspot, with a single playing field for 1,200 young people – LBRuT owes a duty of care to pupils and its staff. Being situated as it is at the edge of the Borough, at this size LBRuT would be powerless to prevent out-of-Borough pupils attending from Hounslow and Hammersmith, to the detriment of LBRuT demand and the LBRuT taxpayer⁵. In contrast, a high-quality three-form entry secondary school, serving the local communities of Mortlake, Sheen, Barnes and Kew that will bear the burden of the school, would in principle be acceptable to the majority of the Group as an alternative to a primary school; in no case is the huge Proposed Secondary School supported in its present form;
- (g) consequently, before adoption of any proposed school – primary or secondary – there needs to be a much more detailed, publicly-available, independent assessment of:
- (i) the projected local supply and demand, based on appropriate and reasonable assumptions (e.g. local demographics, impact of Brexit, percentage of pupils leaving state education in LBRuT) to ensure there is minimal risk of empty classrooms here or elsewhere in LBRuT as a result of such decision. For instance, we understand the Richmond Park Academy sixth form currently only takes 35 pupils – with a large, new sixth form that may fall further still, despite currently having capacity; and
 - (ii) (only if that reveals a projected shortfall at primary or secondary level) of all the available options for extension of existing sites or use of new sites to satisfy such projected shortfall – including Barn Elms for a secondary school – based on all material factors, to include:
 - (A) accessibility – not artificially limited to 'east of the Borough and 'west of the Borough', which disregards the realities described above;
 - (B) financial viability and availability of ESFA-funding;
 - (C) anticipated catchments (including post-development of the Site);
 - (D) anticipated use of LBRuT facilities by out-of-Borough pupils;
 - (E) a proper legal assessment of s.14/s.14A duties and the NPPF specific requirement for primary place provision in particular;

⁴ The Proposed Secondary School would have approximately 35 per cent. more pupils, in approximately 35 per cent. less space, than the LBRuT average.

⁵ The PBA Report assumes 30 per cent. of pupils will travel in from these areas.

- (F) planning protections (especially to identify land which does not carry protection for a suitable size);
 - (G) complementary proximate facilities, such as running tracks, sports grounds;
 - (H) impact on the local area – in particular, on traffic, noxious gas emissions⁶ (especially in the context of LBRuT being an AQMA and specific areas identified as requiring emissions to be tackled to meet legal obligations), public transport, loss of green space, existing catchment areas to minimise displacement (cf. s.14A duty), wider infrastructure, residents and opportunity cost for development of the relevant site for use in other ways; and
-
- (I) ~~any other material relevant factors, such as statutory consulted opposition (e.g. Network Rail in view of level-crossing),~~

followed by a specific consultation exercise. Based on the scant evidence base offered to date by LBRuT, this exercise has not been done properly; the decision-making process so far – after the initial consultation process which resulted in the adoption of the APB requiring a primary school on-site – has been incredibly opaque and any future process must be more transparent;

- (h) the North-Western Residential Zone:
 - (i) is far too dense, with long, wide blocks (in particular the WL Residential Block);
 - (ii) is of too great a scale relative to the scale of the existing site in that area and the clear requirements of the APB and the APB Consultation Materials (40-50 units per hectare, as annexed, cf. an estimated 130 to 170 units per hectare here – over triple the density); and
 - (iii) (in outline form at least) frankly resembles an over-bearing 1960's ghetto – the opposite of what the APB sought to achieve. It is not permeable and has no evident design features to make it any less imposing, such as a set-back roof. It would benefit from being punctuated by the occasional A1 (shops and retail outlets) and/or A3 (food and drink) uses;
- (i) the WL Residential Blocks must not be four-storey high blocks of flats: they should:
 - (i) include houses (where houses are currently found opposite to reflect the existing urban grain, the APB and the APB Consultation Materials), as well as flats – the APB does not require these all to be located behind Thames Bank, they should be dispersed to reflect the existing local area. Indeed, the Applicant's own CLG presentation 2, which showed its interpretation of the APB, shows houses beside Williams Lane; and
 - (ii) be of two and three storeys in height for compliance with the APB (both the APB Scales and Uses Plan and the text, which includes a requirement for the height to diminish towards the perimeter), the Village Plan, and the Local Plan, as well as the NPPF to the extent the units will fall on a part of the site where no buildings are currently sited;
- (j) as a function of (i) increasing scale of the WL Residential Blocks to between 4 and 6 levels and (ii) the WL Residential Blocks encroaching on the 2011 Development, instead of being set back from Williams Lane by approximately 2.5 metres as the existing buildings are at present, the Plans pose material issues of:

⁶ The clear direction of travel is to mitigate the impact of emissions on pupils, let alone siting a new school in a known pollution hotspot. See, for example: <https://www.london.gov.uk/press-releases/mayoral/mayors-air-quality-audits-to-protect-london-kids>

- (i) significant loss of daylight and sunlight, as evidenced by the Waterman EIA annex⁷;
- (ii) overshadowing; and
- (iii) loss of privacy,

in each case relative to the footprint of existing non-residential buildings on the Site, and that are inadequately addressed by the Plans and the EIA. A 'buffer' and additional amenity space, proposed by the Applicant to mitigate the impact of these factors, and included in the March Exhibition plans, do not feature in the submitted Plans. Otrusive light pollution from floodlighting (see below) also remains a concern notwithstanding the EIA concluding otrusive light will not reach neighbouring houses;

- (k) affordable housing must not be concentrated in any one area, in particular the North-Western Residential Zone adjacent to which can already be found an existing high concentration of affordable housing at Reid Court, Combe House and part of the 2011 Development. Failure to ensure, in accordance with the NPPF and the London Plan, that it is sensitively incorporated into and across the Site will result in the creation of a ghetto that may ultimately contribute to greater deprivation, a lack of social mobility and greater long-term cost to LBRuT and the taxpayer. It would also disproportionately affect residents of the 2011 Development and neighbouring roads. Further, the affordable housing should include 20 per cent 'affordable rented' – aimed primarily at key workers – in lieu of 20 per cent. of the 'social rented' allocation and in addition to the 20 per cent. intermediate allocation, to ensure the Development is able to attract key workers and to improve the financial viability analysis (allowing fewer units overall);
- (l) the quasi-total loss of grass, and the loss of one entire playing field, on the existing playing fields is strongly opposed and should be resisted by LBRuT on the basis that:
 - (i) the APB expressly provides for the retention and enhancement of the playing fields for football and/or cricket (noting that only recently were the bowling greens removed to allow construction of the 2011 Development);
 - (ii) the land in question is designated OOLTI, and the criteria for 're-provisioning' (i.e. quantum, quality and openness) of the land removed have very clearly not been satisfied – for instance, a bus park is not OOLTI;
 - (iii) 3G and MUGA are not satisfactory replacements for grass for a whole host of reasons: what it offers to the natural habitat and the ecosystems it supports (which interact closely with those at the nearby river-side, something not adequately addressed by the Waterman EIA), the flood prevention characteristics in a Level 2 flood risk zone and what it contributes to the 'green' character of the area – this is different to the analysis where concrete land is being built on, we already have grass here;
 - (iv) the London Plan, Draft London Plan, Development Masterplan, Draft Local Plan, and the NPPF all place significant value on provision of sporting facilities: the loss of 50 per cent. of the simultaneous playing capacity in Mortlake at peak times simply cannot be supported by LBRuT. Sport Richmond would welcome an alternative of retaining pitches of reinforced grass;
 - (v) retaining two reinforced grass playing fields would offer a similar (and acceptable) use capacity case as one floodlit 3G pitch, and lower on-going financial expense to maintain;
 - (vi) playing fields (and green spaces generally) provide a focal point for a community and the positive effects that such spaces can have on health and well-being are well-researched and well-documented (see, for example, the

⁷ At 18.138: "As would be expected with a Development of this scale, there are isolated significant effects to the neighbouring residential properties." The detailed data included at Appendix 18.2 reveal a 40 per cent reduction in VSC and a 62 per cent reduction in NSC to ground floor habitable rooms at 2 - 6 Williams Lane. This is well beyond what is acceptable.

very recent 'Fields In Trust' survey). Enhancement of green spaces for educational facilities marks a clear direction of travel in policy terms⁸;

- (vii) the floodlights, netting and barriers that will doubtless be introduced (though not shown on the plans) will be an eye-sore, and the obtrusive light will potentially ruin the important view from Chiswick Bridge towards the Site – an important vista, but which does not appear to have been considered by the EIA;
- (viii) the playing fields have archaeological and historical value, being situated as they are to the south of the site of Cromwell House (which site will fall beneath Building 18) and the pitches reportedly having been used by the successful England 1966 World Cup team to train; and
- (ix) the 'pocket park' is of questionable value; being situated as it is beside a main road, in the middle of a known pollution hotspot and next to a large school where pupils may congregate and encourage anti-social behaviour. Do we really want to encourage children to play informal ball games immediately beside a main road?;
- (m) parking in the vicinity of the North-Western Residential Zone and on Williams Lane has not been adequately addressed. As a minimum we would expect to see the introduction of a CPZ (with passes and visitor passes made available to existing Group residents) to mitigate the impact that car usage by new residents will have on neighbouring residences. In a sub-urban setting such as this with extremely low PTAL (being 1 beside the North Western Residential Development), levels of car ownership by necessity exceed those proposed of 0.7 cars per unit. Provision should be one car per unit (per the APB), and significantly more than 15 parking spaces should be provided for school staff, sixth-form pupils and visiting sports teams; and
- (n) (albeit of secondary concern) the use of the red brick is frankly not especially attractive or in-keeping with London brick from the Village Plan – the two local Berkeley Homes developments at Chiswick Gate and Brewery Gate, Twickenham are good examples of what would be more palatable.

2.3. The Group would also comment that, unless and until a viable, sustainable, fully-financed and integrated transport plan has been devised for the Site and the surrounding area, it is hard to see how the Borough can contemplate approving any material development? The Applicant's advisers have continually laid the responsibility for transport at the feet of the Borough, TfL, South Western Railways and Network Rail. That may or may not be correct. But irrespective of that, until transport connectivity (critical to site capacity under both the London Plan and the Draft London Plan) – and the consequent impact on vehicular emissions - are addressed, the Plans cannot properly be approved in their current form. For instance, due consideration should be given to extending the 22 and 219 bus services through Mortlake to Kew and/or Richmond, as well as whether river transport can be introduced. Consideration should also be given to introducing a 'fast' or 'semi-fast' service from Mortlake to Vauxhall and London Waterloo (as we understand used to be the case) in view of the significant increase in user-base over the last ten years and anticipated through the Plans.

2.4. Save where inconsistent, the Group also supports the position put forward by the MBCG.

2.5. For the record, the Group is particularly supportive of the following aspects of the Plans:

- (a) the location of the Proposed Secondary School (if not the school itself, and provided all efforts should be made to incorporate mitigants that avoid a congregation of pupils around the school);
- (b) limiting the Proposed Secondary School to three storeys in height (albeit the APB proposed a school of two storeys), but the roof top use should be opposed on the basis of loss of privacy to neighbouring residences;
- (c) retention of the mature trees (which benefit from TPOs) to the north of the playing fields;

⁸ <https://www.tes.com/news/ps10m-put-aside-nature-friendly-schools>

- (d) making the main entrance to the Proposed Secondary School to the east and making the road to the north of the Proposed Secondary School a 'service road' with emergency-vehicle only access, with raisable bollards, in each case to reduce the impact on existing residences;
 - (e) the provision of at least some green and amenity space on the Site (including the 'Green Link' and the garden courtyards) and the retention of as large an open surface area of the playing fields as possible as grass (albeit not sufficient to override the OCLTI protection);
 - (f) heights of buildings diminishing towards the perimeter of the Site in line with the APB (albeit not sufficiently to be compliant as regards the WL Residential Blocks);
 - (g) improvements to Williams Lane and the introduction of a new, wide pavement on the east of Williams Lane beside the playing fields;
-
- (h) widening Williams Lane to the north of the playing fields in places (though this must not encroach on the playing fields nor cause disruption to those residences that border this area);
 - (i) basement parking provision;
 - (j) the mix of uses incorporated and the locations for those uses;
 - (k) incorporating a square/open space on the central / eastern part of the site large enough to accommodate periodical and seasonal attractions such as a farmer's market, an ice-rink or low-key entertainment events;
 - (l) giving community access to the Maltings Building, though this should be two floors including on the second floor a café/restaurant/bar that can take advantage of riverside views and be available for community hire – see further the MBCG's comments; and
 - (m) opening up the riverside to the public and introducing new elevated pathways less liable to becoming submerged at high tides.
- 2.6. Applicant section 106 contributions and CIL should be made publicly available and be rigorously pursued by LBRUT planning. However, and this is important, this revenue MUST NOT be used as a means for LBRUT to satisfy itself as to adequate future supply of key facilities and services, such as nursery and primary education and healthcare provision – as LBRUT itself has acknowledged, there are not the available sites in the vicinity to provide these, so on-site provision is essential. If this means a reduction in density, so be it.
- 2.7. Planning conditions should include a restriction on transfer of all or part of the Site by the Applicant for a period of at least 10 years.
- 2.8. Planning conditions should require the Applicant (and the Applicant shall be required to procure that its employees, sub-contractors any other people acting under or for it) to:
- (a) limit the working hours on the site to 9am to 4.30pm, weekdays only;
 - (b) use only constructors registered with the 'Considerate Constructors' scheme;
 - (c) keep noise to a minimum, including through the use of all reasonable mitigation techniques – a number of people living here work from home or have young children who sleep during the day;
 - (d) keep dust and other particle dispersion from the site to a minimum, again including through the use of all reasonable mitigation techniques – a number of people living here suffer from respiratory problems;
 - (e) offer each local resident the option of twice annual cleaning of all external affected by the site development during construction and a 'deep-clean' of all affected residences at the end of construction;
 - (f) ensure access to the Site is almost exclusively via the Lower Richmond Road (or the river) and not via Williams Lane, which is too narrow and runs too close to existing residences / protected trees and green space to accommodate large or heavy vehicles; and

- (g) give local residents at least one week's notice of the time of any works that might reasonably be expected to be particularly disturbing or exceptional, demolition works being the prime example.
- 2.9. Judgement is reserved on the detailed elements of matters for which approval is presently sought only in outline. In particular, in relation to the design, layout and appearance of the North-Western Residential Zone.
- 2.10. In relation to community consultation, as communicated to the Applicant's advisors on a number of occasions throughout the CLG process, comments submitted on behalf of the Group in the CLG sessions, and more generally, have not been given proper consideration. There was very much a feeling of 'form over substance' to some of the sessions. In some cases, positive aspects of the scheme supported by the Group, or which the development team undertook to include, have even been reversed. For instance, the WL Residential Units were reduced to three storeys – as they should be at a maximum – for the July exhibition, but following that, without any community feedback we're aware of requesting this, they were then increased to four storeys. Another example is the removal of amenity space beside Williams Lane proposed at the March exhibition. We have also consistently commented on the need to allocate affordable housing across the site. Notwithstanding this, the Group does note that, after many requests from across the community, the Proposed Secondary School was moved to the location shown in the Plans, which was welcomed.
- 2.11. LBRuT (with expert assistance, where required) should scrutinise the viability data and site management proposals in order to be confident that the development will be self-financing, with high servicing standards, even in a stress-tested scenario such as Brexit. We cannot have a situation where the development falls into disrepair with inadequate provision for maintenance and key services such as pavements, lighting and security. Contingency funds and credit support from the Applicant should be sought.

3. **Final comment**

There remains a fantastic opportunity to develop the Site in accordance with the terms and objectives of the APB which the Group (literally) bought into and in so doing to create a new village heart for Mortlake. These will deliver sustainable development for Mortlake and the wider Richmond Borough. Residents entirely recognise that the Borough faces competing demands requiring an analysis of complex facts and difficult decisions. However, that does not mean we should collectively accept what is quite clearly at present a sub-optimal solution.

4. **Heads of objections**

The Group's responses contain objections and observations in respect of the Applications under the following heads:

- (a) Overshadowing
- (b) Loss of daylight and sunlight to habitable rooms
- (c) Overlooking / loss of privacy
- (d) Inadequate parking
- (e) Overbearing nature of proposal
- (f) Loss of trees and loss of ecological habitats
- (g) Design and appearance
- (h) Layout and density of buildings
- (i) Effect on listed buildings and conservation areas
- (j) Access
- (k) Traffic generation
- (l) Noise and disturbance from the proposed development
- (m) Public visual amenity
- (n) Flood risk

Glossary

Term	Description
2011 Development	The residential development completed in 2011 comprising 17 houses and some 64 apartments at Williams Lane and Wadhams Mews, SW14
2015 Cabinet Papers	The minutes relating to and other documents (including the Richmond Council Revised School Place Planning Strategy 2015-2024) prepared for the LBRuT Cabinet meeting on 15th October 2015
3G Pitch	The proposed 3G artificial full-sized playing field shown in the Plans occupying part of the two grass playing fields
APB	The adopted planning brief for the Site from 2011, a supplementary planning document
APB Consultation Materials	The consultation papers (including the questionnaire and indicative land-use options) relating to the "Barefoot Consultation - Future of Stag Brewery and related areas 2010" carried out by LBRuT as a prelude to the APB. A copy of the preferred 'lower density' residential option referred to in the final APB is annexed.
APB Scale and Uses Plan	The proposed design for the Site, including maximum acceptable scale of buildings, set out at Appendix 1 to the APB
Applicant	Reselton Properties Limited
Application	Has the meaning given to that term at the start of this letter.
AQMA	An 'Air Quality Management Area', designated pursuant to Part IV of the Environment Act 1995
Borough, or LBRuT	The London Borough of Richmond upon Thames
Development Masterplan	LBRuT's current 'Adopted Development Master Plan'
Education Act	Unless otherwise stated, the Education Act 1996
EIA	The Environmental Impact Assessment relating to the Applications (including its annexures), required pursuant to The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011
Local Plan	The local plan, in its current form on the Borough website pending adoption, further revision and replacement, which will supersede the Development Masterplan
MBCG	The Mortlake Brewery Community Group
MUGA	The proposed 'Multi-Use Games Area' shown in the Plans occupying part of the two grass playing fields
North-Western Residential Zone	The area of the Site occupied in the Plans by Buildings 18, 19 and 20
NPPF	The National Planning Policy Framework, a material consideration in relation to planning applications pursuant to Sections 19(2)(a) and 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990

OOLTI	'Other Land of Outstanding Townscape Importance', a designation afforded by the Development Masterplan and the draft Local Plan
Plans	The detailed proposals for the Site set out in the Applications to which these comments relate.
Proposed Secondary School	The secondary school the subject of Application 18/0548/FUL
Site	The Stag Brewery development site, identified as SA24 in the Local Plan
WL Residential Blocks	That part of the North-Western Residential Zone identified in the Plans as Building 18.

Schedule

Developer's analysis of building heights relative to APB



Planning app scale versus APB.pdf
