

Mr. Michael Olusola Fasosin
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To: London Borough of Richmond Upon Thames (**LBRuT**), Planning Department

By email to: stagbreweryredevelopment@richmond.gov.uk

Copy to: Zac Goldsmith, MP
Council Leader Paul Hodgins
Councillors for Mortlake and East Sheen
and selected others.

Date: 11th of May 2018

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

18/0547/FUL (Main site - detailed and outline)

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

18/0548/FUL (Secondary school)

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

18/0549/FUL (Chalker's Corner works)

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

Context

I am a resident of Williams Lane, Mortlake (SW14) I live with my family opposite the existing football field. I support the feedback you've received from the **Willams Lane and Wadham Mews Residents Group submitted by Max Millington**. I am also a member of **LoveMortlake Campaign Group** an offshoot of the **Mortlake Brewery Community Group**. I support the general consensus of the Local Group's views on the emerging plans.

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 my own supplementary responses to the groups responses).

This response is made in relation to all relevant aspects of each Application. We moved into the March 2012 Development upon construction in December 2011, following adoption by LBRuT of the APB, which itself followed a site-specific consultation. 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 Mortlake Brewery development is a once in a lifetime opportunity to put the heart into Mortlake as well as design for future generations a sustainable development - a positive for the whole area.

The entire Mortlake community absolutely welcome the development. There are positive elements of the Developer's submitted plans that are welcomed. However, for the purpose of the planning response brief. I will focus on the objections.

Planning Applications Objections

However, there are areas of the development that the Developers and the Council haven't given enough evidence they've thought through in an integrated manner.

Their summary areas of objections include the following.¹

- **Design Density** – The design is too dense, North West buildings too tall dwarfing existing buildings and appears to look like dense ghetto with formless buildings.
- **Traffic and Transport** – We already suffer from traffic pollution in Mortlake. The air quality is already one of the worst in London due to slow moving traffic on Lower Richmond Road. Worse still. The 6th form school, new dense flats, cinema is only going to add more congestion. The Rail Crossing is an immovable obstacle. I'm also aware that Network Rail have objected to the development due to the additional risk it puts on the crossing and the lives of pedestrian. I support Network Rail. More importantly, there isn't adequate pedestrian area, parking, extra train coaches and roads to deal with volume of traffic the developers are assuming is there besides the immovable natural barrier of the river. When you look at the holistic impact, more traffic, means more carbon monoxide. The council and the developers assume that children will cycle on the river to the development. The likelihood is the pavements, buses, trains and roads in the area will come under increasing pressure which will only have a cascade effect on the environment and well-being of local residents.
- **Green Spaces** – I am extremely disappointed that the developers with the councils support wish to sacrifice the existing green space which provides vital support for the flora, fauna and production of oxygen to replace the fumes from cars. We see Canadian Geese, Herons, Parrots, Magpies, Pigeons, Crows, Blue tits and occasional Jays using the field for resting, feeding and play. We've also spotted Starlings playing there. These are not often seen in the area.

¹ Details on LoveMortlake website See here for more details.
<http://lovemortlake.org.uk/2018/04/10/have-your-say-by-13th-may/>

The development seeks to replace a community playing field with an all-weather astro turf. The field provides a balance in the local ecosystem by enabling the production of oxygen to replace the carbon monoxide produced by slow moving cars on Lower Richmond which pollutes the local environment due to traffic. Besides, the playing field provides a focal point in the community for sports. Therefore, the development design didn't set a target to be carbon-negative.

- **Chertsey Court** – Chalkers Corner is a choke point already. Any extension to the junction will only hurt the local residents particularly the folks at Chertsey Court. The loss of green space to accommodate the widening of the junction is only going to add additional carbon dioxide into the atmosphere. From all past road widening schemes, they only generate more traffic and pollution. From an ecosystem perspective, losing the small green space Chertsey Corner residents have increases the risk of health-related issues due to additional carbon monoxide being pumped into the atmosphere. Which means more pressure on the otherwise, under pressure NHS. On that basis, I object to the current plan.
- **Health Facilities-** With the increased population, pollution and loss of green space, there is no provision for additional health care facilities. It's very obvious the additional pollution generated by slow moving vehicles from the development including the loss of green space will only add more carbon monoxide and carbon into the atmosphere. A 3G Turf is only encouraging college students to be couch potatoes that ultimately impact the health care system. Again, lack of ecosystem thinking. On that basis, I object to the current plan.
- **Environmental Impact:** The development will use gas fired boilers when the trend is towards renewable energy sources such as air, solar and wind which minimise hidden environmental impacts. Flora and Fauna such as the various birds that use the field will be lost for ever. Therefore, the development isn't future proof. The new field will also be floodlit thus increasing light pollution. On that basis, the current plan is not environmentally sustainable, or the playing fields should be designated a Local Green Space, in each case under the National Planning Policy Framework. Also see the 25 Years Environment Plan.²
- **Wellness:** A healthy nation is a wealthy nation. Putting 1200 secondary sixth form school in a confined space with one astro turf is not putting the

² 25 Years Environment Plan by the UK Government <https://www.gov.uk/government/publications/25-year-environment-plan>

well-being of the children, local residents and the teachers first. A basic requirement would look at a healthy non-dense building with a soul, nourishment, greenery and community at its heart. At a time when we're all concerned with the pressure on the NHS and the impact of diet and obesity downstream, piling 1200 children in a confined space is only going to put pressure on our health system. In other words, the we probably need another local hospital to deal with the impact this development will create if not thought through. A 6th form is typically open 24 x 7 for most of the year given school activities and teachers staying late to mark school work. This will have further downstream impact that hasn't been factored in anything discussed so far. See the Nature Friendly School supported by our Prime Minister³

- **Cinema:** On the surface, the provision of a Cinema seems gives the community a leisure space and additional entertainment space. Given the transportation and environmental impact outlined above, this will only bring additional traffic, noise pollution and environmental pollution to the area. Cinemas typically attract people from other areas who may choose to drive thereby increasing the pressure on parking spaces and increasing carbon emission. Without creating a better balance in the development based on ecosystem thinking. On the basis that the current plan is not holistic. I object to the provision of a cinema.
- **Secondary School -** The Proposed Secondary School is not supportable in its present form: it appears a case of quantity over quality⁴ and cramming an excessive number of pupils into a known pollution hotspot – LBRuT owes a duty of care to pupils and its staff - with a single plastic playing field and no due regard for what the I, as a parent want to see (a key factor in LBRuT's duty under s.14A Education Act). 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 primary school with access to the school field or a high-quality, three-form entry secondary school, serving the local communities of Mortlake, Sheen, Barnes and Kew that will need to co-exist alongside the school, would in principle be acceptable to me as a resident. I do not see any way I would want my child to go to a school that doesn't encourage sporting activities due to lack of space. This is only going to add more pressure to the NHS downstream- in no case is the Proposed Secondary School supported in its present form;

³ <https://www.tes.com/news/ps10m-put-aside-nature-friendly-schools>

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.

- before adoption of any proposed school – primary or secondary – there needs to be a much more detailed, publicly-available, independent assessment of:
- 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
- (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:
 - accessibility – not artificially limited to 'east of the Borough and 'west of the Borough', which disregards the realities described above;
 - financial viability and availability of ESFA-funding;
 - anticipated catchments (including post-development of the Site);
 - anticipated use of LBRuT facilities by out-of-Borough pupils;
 - a proper legal assessment of s.14/s.14A duties and the NPPF specific requirement for primary place provision in particular;
 - planning protections (especially to identify land which does not carry protection for a suitable size);
 - complementary proximate facilities, such as running tracks, sports grounds;
 - 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
 - any other material relevant factors, such as statutory consultee 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-

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>

site- has been incredibly opaque and any future process must be more transparent;

Closing Remarks

The linear methods of production and consumption are unsustainable for the planet. As urbanisation continues, hunger for greater resources will accelerate if the current consumption trajectory continues. For cities, this means increased waste. The linear model of "produce, use, dispose" is wasteful by design, while the circular economy is conceptualised as a continuous cycle of value preservation and resource optimization, presenting sustainable alternatives for eliminating waste.

Today, more than one-half of the world's population lives in cities, a figure that is forecast to rise to 70% by 2050. The quality and resource rationality of cities will become an increasingly critical issue. Cities are engines of economic growth, generating approximately 85% of global GDP. They are places where people live, work, innovate, meet and consume considerable amounts of resources.

Therefore, cities play a pivotal part in the transition to a circular economy. Making cities sustainable means rethinking every element of urban living. This includes moving away from practices such as landfill dumping and degenerating resources (e.g. the incineration of waste). It is, therefore, imperative that solutions are harnessed to ensure products are kept in circulation to minimize the loss of resources during the production and consumption processes.⁷

Climate change and issues related to it impacts the entire planet, one would naturally have assumed the developers would look at current sustainable development principles such as circular economy. **It is very disappointing that the current plan that the entire community hoped would give a heart to Mortlake, lacks imagination other than stack them high and dense for-profit motive.** It's even more disappointing that the council through the pre-app process hasn't influenced this plan enough for the benefit of future generations other than short term political motives. Even more disappointing is the silence of our local MP who claims to be a Green MP.

⁷ See WEF http://www3.weforum.org/docs/White_paper_Circular_Economy_in_Cities_report_2018.pdf

Glossary

Term	Description
2011 Development	The residential development completed in 2011 comprising 17 houses and some 64 apartments at Williams Lane and Wadham 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.

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