

All responses received on the Sustainability Appraisal - Publication consultation - plus Officer responses (published 30 06 2017)

Comment ID	Representor ID	Respondent name	Part of Local Plan responding to	Soundness - Legally Compliant	Soundness - Sound	Soundness - Complies with the Duty to Co-operate	Reason Consider Unsound - Positively Prepared	Reason Consider Unsound - Justified	Reason Consider Unsound - Effective	Reason Consider Unsound - Consistent with national policy	Details of reason(s) for representation	Change(s) consider necessary	Officer response
4	308	Margaret Woolmore	SA 24 Stag Brewery, Lower Richmond Road, Richmond	No	No	No					<p>I would like to express my concerns regarding the proposal of a 1000-pupil secondary school on the site of the development of Mortlake Brewery . The green playing field is used every weekend by local organised youth clubs ,and adults alike . this is a conservation area.! The traffic this school will attract will increase drastically. We need to recall the horrendous situation we had to deal with some years ago .(Sheen School ,Upper Richmond Rd, at least ten police on duty to control the unruly mob.,every day , Bus drivers, refusing to move,and been threatened, and on two occasions two retired passengers ,(one a retired head mistress) had been litterly trampled on. Garden hedges set on fire ,gravel thrown all over the road. I recall at one meeting ,asking why we must have these undesirables from inner London in our area,, but a clear explanation had never been given. It was suggested that we(counsel tax payers) could give a sum to inner London Borough , for the building of a School if needed ,to avoid this nightmare. Please let us not have a repeat of this again .there must be another suitable place to build a school.</p>		<p>Comments noted. Policy SA 24 requires the provision of an on-site new 6-form entry secondary school, plus sixth form. The Council is working closely with the developer and the Education Funding Agency to ensure the delivery of the secondary school. This is based on local evidence and need, as set out in the Council's School Place Planning Strategy. A number of alternative sites for a secondary school were considered. The assessment of alternative sites included (1) Barn Elms Playing Fields, Barnes, (2) London Welsh RFC Ground, Old Deer Park, Richmond, (3) London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Richmond and (4) Pools on the Park, Old Deer Park, Richmond. However, all alternative sites have been discounted for a number of reasons, particularly as the majority would have required built development in land designated as MOL, and all the alternative sites are widely used and popular multi-sports use sites in the borough.</p> <p>The policy also requires the retention and/or reprovion and upgrading of the playing fields. In addition, the Local Plan's policy on Other Open Land of Townscape Importance (OOLTI) will also be applied to any proposal coming forward on this site.</p> <p>The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, such as Conservation Areas, transport and amenity, will be assessed as part of the consideration of a planning application. No change.</p>

3	236	John Repsch	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No	No					<p>I am against the plan to build on the Mortlake Brewery playing field for the following reasons:</p> <ol style="list-style-type: none"> 1. Organized weekend sports have become a tradition on the site, and to lose the tradition would be to lose a vital element of Mortlake's heritage. 2. The playing field is a greenfield site, and should therefore remain sacrosanct. 3. We have lost hundreds - if not thousands - of playing fields to house-building over the past twenty years, and there should by now be protection for them. The playing of sports is a vital part of a child's development, both socially and healthwise. 4. Concerns have been raised about the risks of having a school of 1,000 pupils in the Mortlake area. Apparently there were a number of fires started by Sheen School pupils a few years ago. 5. The sudden influx of people to the area, along with parents collecting or dropping off their children by car would lead to even greater traffic congestion and air pollution on each side of the Mortlake level crossing. 6. I have heard that any loss of greenery in Mortlake would be recompensed by an equal amount added elsewhere in the borough. That would do Mortlake no good whatever. 	<p>Comments noted. No change. The Local Plan does not propose built development on the playing fields. Policy SA 24 requires the retention and/or re-provision and upgrading of the playing fields. In addition, the Local Plan's policy on Other Open Land of Townscape Importance (OOLTI) will also be applied to any proposal coming forward on this site. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances (however, re-provision would have to be on site and not elsewhere in the Mortlake area). To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <u><i>This includes the retention and/or re-provision and upgrading of the playing field within the site.</i></u>"</p> <p>The scale, density and massing of the proposed uses and the potential impacts of the proposal, including the schools, such as on character, transport and amenity, will be assessed as part of the consideration of a planning application.</p>
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14	291	Kwun Teng Tsang	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	See Publication Local Plan Comment ID 176	<p>Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report</p> <p>Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)</p> <p>Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)</p> <p>Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)</p> <p>Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)</p> <p>Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)</p> <p>Row 12 - accessible local services - replace reference to 'secondary' with 'primary'</p> <p>Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses</p>	<p>Comments noted. No change.</p> <p>Possible positive and negative impacts will ultimately depend upon the design and details of the scheme to be put forward by the developers as part of a planning application. The Guidance on design and local character for the area is set out in the Mortlake Village Planning Guidance SPD and in the adopted planning brief. The SA takes account of opportunities, enhancements and mitigation measures that can be conditioned through the grant of planning permission. For example, any redevelopment proposal will require a full Transport Assessment, as part of which surveys will need to be carried out to ensure there are not demonstrably negative impacts on the wider area and residents' amenity. In addition, an Environmental Impact Assessment will be required as part of a planning application for this site, which will fully assess impacts on biodiversity, open spaces etc. and where applicable identify appropriate mitigation measures. It should be noted that the need for a secondary school in this location has been identified in the Council's School Place Planning Strategy. As set out in policy SA 24, the requirement is for a secondary school and it is the purpose of the Sustainability Appraisal to assess the proposals set out in the Plan.</p>
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17	127	Katie Hyson	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	<p>Please find attached my response to the local plan along with my emphatic endorsement of the Millington's response.</p> <p>See Publication Local Plan Comment IDs 367, 368, 369, 370, 371, 372, 373, 374, 376, 377, 378, 379 and Sustainability Appraisal Comment ID 16</p> <p>Except as follows, I endorse the views expressed by Mortlake Brewery Community Group in its representation(s).</p>	<p>Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report</p> <p>Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)</p> <p>Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)</p> <p>Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)</p> <p>Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)</p> <p>Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)</p> <p>Row 12 - accessible local services - replace reference to 'secondary' with 'primary'</p> <p>Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses</p>	See Officer response to Comment ID 14 above.
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11	135	Alistair Johnston	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107- 108	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>I endorse the views expressed by Mortlake Brewery Community Group in its representations</p> <p>In addition, I would emphasise that the density of the proposed Brewery development is crazy... the Brewery site should be used for a Secondary School OR a housing development, not both... the traffic and transportation issues of both will cause a Perfect Storm of congestion and overcrowded public transportation in this already very busy part of the Borough...</p> <p>I would also like to take issue with the loss of the "Green Corridor" to the river which was a key component of the 2011 development plan... this would make a huge difference to the Mortlake area and it would be a tragedy if the one in a lifetime chance to create this great public amenity was lost...</p>	<p>Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report</p> <p>Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)</p> <p>Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)</p> <p>Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)</p> <p>Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)</p> <p>Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)</p> <p>Row 12 - accessible local services - replace reference to 'secondary' with 'primary'</p> <p>Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses</p>	<p>See Officer response to Comment ID 14 above.</p> <p>In addition, note that the policy requires links through the site, including a new green space and high quality public realm link between the River and Mortlake Green.</p>
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10	262	Matthew Smith	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	See Publication Local Plan Comment ID 140	Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport) Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions) Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed) Row 7 - landscape and townscape - amend to add a negative (if large secondary school required) Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed) Row 12 - accessible local services - replace reference to 'secondary' with 'primary' Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses	See Officer response to Comment ID 14 above.
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9	11	Anthony Atkinson	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>endorse the views expressed by Mortlake Brewery Community Group in its representation(s).]</p>	<p>Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report</p> <p>Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)</p> <p>Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)</p> <p>Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)</p> <p>Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)</p> <p>Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)</p> <p>Row 12 - accessible local services - replace reference to 'secondary' with 'primary'</p> <p>Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses</p>	See Officer response to Comment ID 14 above.
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8	233	Karen Rawson	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>I endorse the views expressed by Mortlake Brewery Community Group in its representation(s).]</p>	<p>Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report</p> <p>Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)</p> <p>Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)</p> <p>Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)</p> <p>Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)</p> <p>Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)</p> <p>Row 12 - accessible local services - replace reference to 'secondary' with 'primary'</p> <p>Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses</p>	See Officer response to Comment ID 14 above.
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12	281	Stephen & Margaret Tester	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>My wife, Margaret Tester, who lives with me at the above address, endorse the views expressed by Mortlake Brewery Community Group in its representation(s).] We feel particularly strongly that the proposed secondary school is too small for the site, and that any decision to build it in this location would be misguided, given the availability of ample land at Barn Elms for such a development. The introduction of a 1000 pupil school, accessed from the already congested Lower Richmond Road, coupled with a 1000 unit residential estate is going to create huge traffic problems which are not alleviated in any significant way by the current proposals. The end result will be a heighthened level of pollution, an enhanced risk of asthma and similar problems and an overall reduction in the quality of life in the area.</p>	<p>Table beneath SA 24 on page 107/108 of Sustainability Appriaisal Report</p> <p>Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)</p> <p>Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)</p> <p>Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)</p> <p>Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)</p> <p>Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)</p> <p>Row 12 - accessible local services - replace reference to 'secondary' with 'primary'</p> <p>Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses</p>	<p>See Officer response to Comment ID 14 above.</p> <p>In addition, note that a number of alternative sites for a secondary school were considered. The assessment of alternative sites included (1) Barn Elms Playing Fields, Barnes, (2) London Welsh RFC Ground, Old Deer Park, Richmond, (3) London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Richmond and (4) Pools on the Park, Old Deer Park, Richmond. However, all alternative sites have been discounted for a number of reasons, particularly as the majority would have required built development in land designated as MOL, and all the alternative sites are widely used and popular multi-sports use sites in the borough.</p>
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5	213	Stephanie Pemberton	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	See Publication Local Plan Comment ID 40	Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport) Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions) Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed) Row 7 - landscape and townscape - amend to add a negative (if large secondary school required) Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed) Row 12 - accessible local services - replace reference to 'secondary' with 'primary' Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses	See Officer response to Comment ID 14 above.
2	125	Rachel Hughes	SA7 Strathmore Centre, Strathmore Road, Teddington	Yes	No	No					The site is currently used for social infrastructure in the form of pre and post school childcare provision by Stanley AM PM Project Ltd for around 400 children from 2 local schools: Stanley and St James. The consideration that the site could be used for affordable housing is contrary to the requirement to maintain community provision, and removal of the social infrastructure element will be detrimental to the local population, by preventing parents from being able to work. The plan in relation to site SA7 should be revised to remove reference to affordable housing, and should refer only to community & social infrastructure use.	The plan in relation to site SA7 should be revised to remove reference to affordable housing, and should refer only to community & social infrastructure use.	Comments noted. The purpose of the Sustainability Appraisal is to assess the proposals as set out in the Local Plan. It should be noted that policy SA 7 recognises the important contribution that the child-care services provide at this location. Policy SA 7 also states that proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way (which is intended to refer to re-provision 'on this site') or elsewhere in a convenient alternative location accessible to the current community it supports.

1	82	Alison Fordy	SA 7 Strathmore Centre, Strathmore Road, Teddington	Yes	Yes	Yes								My child attends Stanley Primary School and goes to Scamps after school club on this site regularly. Scamps is a fantastic resource and offers affordable childcare to working parents. My daughter, Isabella (5, in Reception) loves the outside space Scamps has to offer - and it's a really good space for kids to unwind after a day at school. Furthermore, Isabella goes to Holiday Club at Scamps and the outside space is vital to her enjoyment on sunny summer days, and offers her fresh air and exercise. A smaller site with less outdoor space for the children to run about would in no way be sufficient to the needs of my child. I strongly urge you to reconsider building on this site that is essential to the local community.	Comments noted. The purpose of the Sustainability Appraisal is to assess the proposals as set out in the Local Plan. It should be noted that policy SA 7 recognises the important contribution that the child-care services provide at this location. Policy SA 7 also states that proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way (which is intended to refer to reprovision 'on this site') or elsewhere in a convenient alternative location accessible to the current community it supports.
15	287	Timothy Thomas	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107- 108	No	No	No	Yes	Yes	Yes	Yes	See Publication Local Plan Comment ID 182		Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport) Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions) Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed) Row 7 - landscape and townscape - amend to add a negative (if large secondary school required) Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed) Row 12 - accessible local services - replace reference to 'secondary' with 'primary' Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses	See Officer response to Comment ID 14 above.	

13	155	Kate Le Vesconte	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.	Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport) Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions) Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed) Row 7 - landscape and townscape - amend to add a negative (if large secondary school required) Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed) Row 12 - accessible local services - replace reference to 'secondary' with 'primary' Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses	See Officer response to Comment ID 14 above.
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16	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake									<p>Representation 1C - Sustainability Appraisal Report shortcomings</p>	<p>The summary of assessment at the foot of the table should be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses.</p>	<p>See Officer response to Comment ID 14 above.</p>
												<p><u>Issue:</u> The table at pages 107 to 109 of the Sustainability Appraisal Report in relation to SA 24 (i) omits to consider certain points of material importance; (ii) relies in certain regards on irrelevant issues and (iii) attributes an incorrect weighting to the positive and negative factors under consideration. This also provides strong evidence that the Council has failed to comply with European Directive 2001/42/EC.</p>	<p>Non-compliance with EU law – environmental assessment</p>	<p>In addition, note that the Sustainability Appraisal incorporates the requirements of the European Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment or the SEA Directive. Further information on this can also be found in the National Planning Practice Guidance on Sustainability Appraisals.</p>
												<p><u>Detail:</u> Row 3 - travel - the brewery has already ceased operations so there is no positive here, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport Row 4 - climate change mitigation - the increased traffic referred to above will materially and negatively impact emissions Row 6 - biodiversity - if any part of the playing field and/or trees are removed, this will be a negative Row 7 - landscape and townscape - if a large secondary school is required, this will be a negative Row 8 - parks and open spaces - if any part of the playing fields are to be removed, this will be a material negative</p>	<p>Planning authorities, such as the Council, must also undertake an SEA in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 which implement the European Directive 2001/42/EC on 'the assessment of effects of certain plans and programmes on the environment' (the 'strategic environmental assessment' directive or SEA Directive) in England.</p>	<p>The Directive describes the objective of SEA as to "provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development".</p>
												<p>For the reasons set out in these representations, in particular that the proposals in SA 24 as regards (i) a new large secondary school and (ii) removal of the playing fields, as well as any proposal to increase the residential housing allocation, will inevitably take the Lower Richmond Road and environs above legal and/or recommended safe levels of noxious gas emissions. The Council has failed to demonstrate – or even properly acknowledge – the impact of this or how (if even possible) it would be mitigated.</p>		

7	232	David Rawson	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>I endorse the views expressed by Mortlake Brewery Community Group in its representation(s).]</p>	<p>Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report</p> <p>Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)</p> <p>Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)</p> <p>Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)</p> <p>Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)</p> <p>Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)</p> <p>Row 12 - accessible local services - replace reference to 'secondary' with 'primary'</p> <p>Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses</p>	See Officer response to Comment ID 14 above.
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6	250	Ella Sanders Smith	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page(s): 107-108	No	No	No	Yes	Yes	Yes	Yes	See Publication Local Plan Comment ID 45	Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport) Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions) Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed) Row 7 - landscape and townscape - amend to add a negative (if large secondary school required) Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed) Row 12 - accessible local services - replace reference to 'secondary' with 'primary' Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses	See Officer response to Comment ID 14 above.
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