

Planning Application 13/2102/FUL

DENMEAD SCHOOL, GLOUCESTER ROAD SITE

STATEMENT OF OBJECTION BY THE

DENMEAD NEIGHBOURS' ASSOCIATION

*ANNEXE 3 – STATEMENT OF OBJECTION TO  
11/4125/FUL (less neighbours' survey)*

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## **INTRODUCTION**

Denmead Neighbours' Association (DNA) was formed to bring together all the residents in the roads around Denmead School's Gloucester Road site. Its purpose is to represent neighbours' interests and to consult with Hampton School over their proposals for the Denmead Gloucester Road site.

Public Consultation: the school's initial notification suggested that the proposals were for refurbishment of the existing buildings. It was not made clear that they were proposing a major new development with a change of function to a full school site and a large expansion of pupil numbers. Residents have always made it clear that refurbishment of the existing buildings, with no increase in numbers, is not a problem. Since Denmead's second public meeting in April 2011 the DNA has had lengthy consultations with Hampton/Denmead. Denmead is owned by and is part of the Hampton School Trust and is being developed as the preparatory school for Hampton School. We found the discussions constructive in helping each side to understand the other's concerns. We were not, however, made aware of which of the six development proposals put forward in the consultation would be chosen for the application until immediately before the application was lodged.

DNA carried out a detailed opinion survey of neighbours (not just DNA supporters) in the four adjoining roads - Gloucester Road, Scotts Drive, Carlisle Road and Wensleydale Gardens. A summary and results form part of this submission. On the basis of that survey – which had an excellent response rate – we are able to submit to the Council evidence and opinion on behalf of the residents with confidence that it reflects their views.

DNA is disappointed to see that the application fails to address the residents' principal concerns as discussed with the school. The school's letter to residents, delivered just before submission of the application, incorrectly suggests that neighbours' objections have been resolved. It presents the reduction in proposed pupil numbers from 192 to 176 as a major concession, ignoring the fact that there would still be a substantial increase from 131 to 176 pupils, and therefore a corresponding increase in traffic. Further the building is sized to accommodate over 200 pupils.

It also claimed to have responded to residents' concerns by moving the building slightly away from one boundary. However, the building in question is in the style of a warehouse and the wall in question is 8m high, so it will form a huge rectangular block looming over houses with shallow gardens.

The DNA on behalf of a substantial number of residents opposes the application that Hampton/Denmead have made on the grounds set out in this submission.

Alison Edwards, Chair, on behalf of the Denmead Neighbours' Association

## **SUMMARY OF OBJECTIONS**

The Denmead Neighbours' Association (DNA), oppose the school's planning application and believe it conflicts with LBRuT's planning policies. We recognise the school's need to renovate its existing facilities on the site and would accept a reasonable proposal to replace those facilities with similar one-storey buildings designed to accommodate the same number of pupils as currently use the site. However, we strongly object to the school's proposal to build a massive, warehouse-like, two-storey building that would constitute a fully self-contained school with ample capacity for 200 pupils.

We believe Denmead's proposal would further worsen the unacceptable traffic conditions around the school; is out of keeping with zoning of the site and all the council's previous planning decisions in relation to it; and would create a building whose bulk and design is totally out of character with the residential area in which the site is located. We also have a number of other specific objections to the proposals.

### **Traffic**

The Traffic Assessment filed on behalf of Denmead/Hampton School fails to capture the traffic situation in Gloucester Road, where the school's pedestrian and vehicle access is located. It is clear to anyone who lives in the area that there is a traffic problem at Denmead drop off and pick up times. Our neighbours' survey shows a severe problem with frequent road blockages and parking across residents' driveways. Residents find the current problems close to intolerable.

There are also traffic problems in Carlisle Road and Scotts Drive, and further problems in Wensleydale Gardens and Road (these two are also affected by the school's main site in Wensleydale Road).

The applicant's proposed Travel Plan is based on inadequate data, and the predicted changes in modal split and especially reductions in car traffic are not justified either by the school's experience with its existing travel plan, or any reasonable comparison data.

The plan to bring more pupils across Carlisle Park is uncertain and likely to raise access and parking problems.

The unavoidable conclusion is that any increase in pupil numbers would make the traffic situation even worse. The proposed development conflicts with planning policy in respect of the traffic impact.

### **Zoning of Land as Other Open Land of Townscape Importance (OOLTI)**

The existing unobtrusive buildings are all single storey with flat roofs except for the sports pavilion, and the majority of the site is taken up with grassed sports pitches. The size and materials of the buildings are in keeping with their surroundings. The site provides a green outlook from Carlisle Park and surrounding properties, with long views across the site to houses or the park beyond.

The proposed building would, by reason of its height and width (it stretches across five houses to the east), dominate and transform the character of the site and prevent the view from Carlisle Park reaching across to Gloucester Road houses as it now does. Its size, style and materials are inconsistent with its surroundings. One of the two pitches would be replaced by two MUGA pitches

with associated fencing and presumably floodlighting. The grassed area of the site would be confined to the north west quadrant of the site.

The DNA submit that the proposed development is wholly inconsistent with the zoning of the site, and does not meet the criteria for an OOLTI site that have to be satisfied before development can be permitted.

### **Local Character and Neighbourliness - Design and Layout**

Currently the site contains a modest sports hall and three single storey classroom buildings, and has been used as a playing field site with classrooms ancillary to the main site. The planning history demonstrates the care that has been taken on previous applications to preserve the nature of the site as playing fields and to allow only buildings that are in keeping with that and their surroundings. The school are applying to turn this into a stand-alone school, with all the extra demands for space that that entails.

The proposed building is on a different footprint to the existing classroom buildings. It is over double the floor space of the combined existing buildings, and is two storeys high in a rectangular warehouse style. Its size, shape and materials are completely out of keeping with those of surrounding buildings. It would dwarf the site and its surroundings and bears no resemblance to any other building in its vicinity

The proposed building and other facilities proposed for the site, sports pitches, parking, are too close to neighbouring properties, many of whom have shallow gardens.

We calculate by reference to W.C. provision and means of escape (the only statutory requirements) that it has capacity for well over 200 pupils.

LBRuT planning policy states that development should be in keeping with the character of its surroundings and should not involve an unreasonable loss of privacy and visual intrusion for neighbours. This application conflicts with these policies.

### **Noise and Disturbance**

The DNA neighbours' survey showed residents had an increasing problem with noise and disturbance from out of hours activities in the evening and at weekends, including non-school events in the hall. The houses on three sides are all affected, but it is at its most severe in the north and south where the houses have shallow gardens.

The planning history of the site shows concern by the LBRuT to control noise and disturbance on site. An existing planning condition stipulates that the permitted hours of use of Jubilee Hall are 9 am to 5 pm Monday-Friday, a stipulation which is already not being observed by the school. The school also had to give assurances that pupil numbers would not increase to avoid increased noise and disturbance. The proposals for expansion would make the noise and disturbance worse due to:

- increase in pupil numbers during day time activities
- relocation of sports activities closer to the boundaries (proposed MUGA pitch with fencing right next to Wensleydale Gardens, cricket pitch by Scotts Drive )

The expansion of activities on this site will inevitably have a significant impact on neighbours and on the area which would be inconsistent with planning policy. Out of hours activities should be restricted in accordance with the existing planning condition.

## **Lighting**

At present there is a problem with high and low intensity lighting used for both security and floodlighting. Some of the lights are left on all night. The glare is strong enough to interfere with sleep in upstairs rooms in some Scotts Drive houses and is very marked and intrusive in some homes in Wensleydale Gardens. Complaints have been made to the school.

The proposed new building would have two storeys and, although the plans do not give any information about lighting, it is likely that the building and the MUGA pitch would have floodlighting and/or security lighting. This must introduce more lighting, which would have an adverse and unacceptable impact on residents by increasing light trespass and glare.

## **Ecology/Trees**

The school's application would result in a transformation of the site from being mostly grass to being mostly artificial surface/concrete/building. By rough calculation the change is from four-fifths grass to about one third grass.

The site is used by many birds who feed on grassland. These include thrushes, redwing, fieldfare, starlings and blackbirds. They mostly use the land when the school is not in use.

The school proposes an enlargement of the areas that are built on and have hard surfacing. There are also two artificial pitches (MUGA) which we understand are permeable but do not provide any habitat. The result is a site dominated by artificial surfaces.

We submit that such a significant loss of scarce grassland habitat is contrary to planning policy.

The line of trees at the south of the site forms a corridor of habitat assisted by the enclosing of the ground by fencing. Were the application to proceed, that habitat and any others at the perimeter should be protected. Further, the school should be obliged to replace any trees lost over time with suitable native species and to fill in existing gaps to preserve habitat and enhance screening.

## **Access**

The application proposes that Wensleydale Gardens should be used by construction traffic on a temporary basis to access the application site and on a permanent basis by emergency traffic.

**Current position:** Wensleydale Gardens is a cul-de-sac of 28 houses with two hammerheads. It was built in the 1960s and the front gardens are shallow and unfenced. There is almost no kerb parking possible in the hammerheads and Carlisle Park users also park in the road. The road is not wide enough for two way traffic if cars are parked along one side

The north-west side of the road is the boundary with Carlisle Park; it is a line of overhanging trees with a small, not easily visible pedestrian access to the park about half way along. There is no

pavement on that side of the road, forcing pedestrians to cross or walk down the road, and in our view there is a safety problem here.

There is school and commuter parking at the south of the road, which is close to the Denmead pre-preparatory site in Wensleydale Road, and there are problems of road blockages and parent parking blocking driveways.

**Construction Traffic:** The school wishes to take construction traffic through this road, and to impose parking restrictions for over 12 hours a day with a half day on Saturday. This will intrude on the lives of the residents in terms of noise, disturbance, and lack of anywhere to park. We are concerned as well about the parking needs of those providing care for elderly and disabled residents, many of whom have lived here since the 1960s.

There is no indication that the school have considered the use of smaller vehicles to facilitate the use of the Gloucester Road access or to reduce the hazard and need for parking restrictions in Wensleydale Road.

**Emergency Access:** the existing access to the Gloucester Road site must satisfy health and safety concerns or the school could not operate. There is no reason why that access should not continue to be the school's emergency access after construction. It should be noted that the school have chosen to propose a design that makes the pinch point at the Gloucester Road entrance worse as the new building would jut out into the line of the existing access road adversely affecting the swept path. We submit that this is a matter for the school to resolve and not a reason to open up this cul-de-sac.

In addition moving the emergency exit permanently to Wensleydale Gardens would certainly involve an application for permanent parking restrictions in a road in which there are currently none.

The residents consider that if the school are allowed this emergency access the process of incremental expansion on this site will in the near future produce overwhelming pressure to open up this access to general traffic. They are totally opposed to this as it would destroy the nature of the road as a cul-de-sac.

The DNA submits that the proposed construction access would be unsafe, that the emergency access is unnecessary and that both would adversely affect the amenity of residents.

## DNA's OBJECTIONS IN DETAIL

### Traffic

#### LBRuT traffic-related planning policies

DNA believes that Denmead School's planning application contravenes several traffic-related LBRuT planning policies. Specifically, DNA believes that the school's application contravenes the borough's policy, Core Policy CP5 and Policy DM TP 1 on matching development to transport capacity.

The Core Policy (CP5) states:

*“.policies seek to match development to transport capacity.”*

Policy DM TP 1 Matching Development to Transport Capacity

*“Higher trip generating development will only be permitted in areas which are, or at the time of implementation are, easily accessible by transport other than the private car, and well located with respect to local services. “*

*“5.4.4 The usual measure of accessibility is the PTAL . . . level 6 being the most accessible. . . . Future improvements to accessibility will also be relevant . . There would need to be certainty that future improvements would be implemented in time to serve the development and are sustainable in the longer-term. “*

<i>Targets and Monitoring</i>	<i>Indicator: Proportion of larger new developments of each use class in areas of higher PTAL (5 or above) Target: 95% of larger new developments of each use class in areas of higher PTAL</i>
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We believe the proposed development is a higher trip generating development that will exceed the capacity of the local transport system. Its PTAL score of 2 is below the target set by the borough, and predictions of future improvement, if they can be achieved at all (which we doubt, see below), will not be implemented in time and are not sustainable longer term, contrary to Core Policy CPF and Policy DM TP 1.

We also believe that the school's application contravenes the borough's policies on impact on the transport network - Policy DM TP 2 Transport and New Development.

Policy DM TP 2 Transport and New Development states:

*“The impact of new development on the transport network will be assessed against other plan policies and transport standards”*

*“5.4.6 It is necessary to consider the impact of any new development on the existing wider and local transport network for all modes, how it links to the network, impacts on highway safety, the impact of parking and servicing, and with larger developments what provision for movement and parking for cars, bicycles and coaches (if appropriate) is made within the development itself. . . “*

*“5.4.7 For smaller developments the Transport Statement should include:*

- Existing road, public transport, cycle and pedestrian networks
- Existing on street and other relevant parking provision and usage, parking standards
- Existing traffic and pedestrian flows, desire lines
- Additional trip generation and modal share

*Servicing arrangements, including timing*

*Impacts on road network, public transport and pedestrian routes*

*Travel plan (may or may not be required, depending on size of development)”*

We believe the increased traffic that will be generated by increased pupil numbers will have a severe adverse impact on the existing road transport network, including impacts on highway safety, traffic flow through Gloucester Road and the parking availability in the area near the school at start and end of school times.

Finally, we believe the school’s application contravenes the Borough’s policy on parking - Policy DM TP 8 Off Street Parking - Retention and New Provision. This states:

*“Developments, redevelopments, conversions and extensions will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions.”*

The increased numbers of pupils will result in considerable extra parking in the surrounding roads which will have a severe adverse impact on local parking and traffic conditions. The level of on-site parking provided will not be enough to offset any unacceptable impact.

## **Current Traffic Issues and Likely Trends**

The school’s application needs to be seen against the background of current traffic issues and non-school related factors that will affect the parking and traffic situation. Even with existing pupil numbers, there are major traffic issues in the area near the school at morning drop-off and afternoon pick-up times. Yet the planning application envisages increasing the number of pupils using the site from the existing level of just over 130 pupils to 176 pupils. Furthermore, the proposed school buildings could easily cater for 200 pupils, so if the school wanted, it would have scope to increase numbers even further. There is a direct and obvious correlation between pupil numbers and traffic issues, so the assumption must be that any increase in pupil numbers will mean an increase in traffic and a further worsening in the traffic problems generated in the vicinity of the school each morning and each evening.

Traffic issues are particularly important, given that Denmead’s application replaces some temporary classroom provision with permanent provision and envisages a very significant increase in the total number of pupils using the Gloucester Road site.

The DNA Neighbourhood Survey of summer 2011 demonstrated that even without expansion the existing number of pupils, then 131, using the site generated severe traffic and parking problems: For example:

- 96% of all 120 households surveyed noted that impediment to traffic flow is already a serious concern. 100% of residents on Scotts Drive and Carlisle Road agreed.
- Over 90% of responses from Gloucester Road and over 70% from Carlisle Road indicated that there is a complete stoppage of traffic 3-5 days per week and directly correlated with Denmead School drop off and pick-up times.
- 48% of responses reported delays of longer than 5 minutes caused by traffic stoppages.
- Nearly 45% of responses from Gloucester Road and nearly 35% of responses from Wensleydale Gardens reported parking shortages 3-5 times per week again directly correlated with Denmead drop off and pick-up times.
- Illegal parking across residents' drives and across road junctions is not unusual and leads to considerable inconvenience to both residents and other users of the road network surrounding the school.

The survey process and our discussions with residents yielded a huge number of stories that show what these numbers mean in practice. Here are a few examples:

- Property damage during a traffic blockage when a Denmead parent had no option but to pull into a resident's drive at 49 Gloucester Road. In hastily pulling over, the parent caused damage to the car owned by the resident at 51 Gloucester Road who was parked on-street and sitting in his vehicle. An insurance claim with significant value needed to be filed.
- Emergency service delays including an event reported by a resident where her mother died approximately 5-years ago and one factor was the inability of an ambulance to access the property during the critical 8:30am weekday time of need due to congestion during school drop-off.
- Heated exchanges including one where a Denmead parent had to be physically restrained by a Denmead staff member. A Gloucester Road resident accidentally caused minor damage to a Denmead parent's car when attempting to back their car out of their drive onto a severely congested Gloucester Road during peak school pick-up time. The Denmead parent used extremely aggressive and racist language when challenging the 80+ year old lay preacher and other neighbours attempting to defuse the situation.

The volume of traffic, frequent hasty pulling into driveways to allow opposing traffic to get through, and the heated situations that ensue create a most unsafe environment for residents, road users, and ironically for the pupils of Denmead school itself.

The school suggests that their travel plan has reduced the traffic impact since 2009 and that they can achieve even greater reductions going forward. We do not believe that this is realistic (see below), and also submit that in assessing this application the council needs to take into account other factors, independent of the school, that are likely also to worsen the situation. The main non-school related factors we can identify that may explain the worsening situation in recent years - and need to be projected forward if an accurate forecast is to be made of the likely traffic scenarios if this application were to be granted are:

- Changes to housing in Gloucester Road, e.g. recent conversion of two bungalows into three houses with only one off-street car space on each property. This change will almost certainly

increase on-street parking within 100 metres of the entrance of the school. There are other bungalows in the street that are also likely to be replaced with larger houses at some point.

- Ongoing decline in the number of elderly residents living on Gloucester Road and Carlisle Road. The current state of house prices means that any elderly residents who leave the area are likely to be replaced by multi-earner, multi-car families. This increases the number of cars regularly parked on street by residents.
- Increase in live-at-home post-university adults due to the current state of the housing market that makes it very difficult for young adults to buy a starter home. This means that Gloucester Road (like other local streets) is seeing more houses with three or four cars for the household.

None of these factors has a big impact in a single year, but together they are likely to have some impact over time. They may have contributed to the worsening of the traffic problems over the last five years and suggest that, even with no change in pupil numbers at the school, the likelihood is that the traffic situation will be even worse in five years' time. Against this context, giving planning permission for a building that will inevitably increase traffic at peak times seems clearly against the council's policies.

## **Denmead School's Transportation Assessment**

DNA believes that the Transportation Assessment carried out by the school was flawed and inadequate. An Independent Traffic Consultant contracted by DNA supports the shortcomings identified in the submitted Transportation Assessment and Travel Plan. Their Assessment is included as Appendix E. The key issues are:

### **No clear baseline figures for traffic flows**

Throughout the analysis of traffic flows, parking spots, etc., there is an absence of clear, measured baselines. In particular, there is no attempt to isolate the impact of school-related traffic by assessing the out-of-term situation. Traffic flows cited are derived from typical London street rates based on numbers of dwellings which create a generic baseline that does not match the characteristics of one of London's furthest outlying suburbs.

### **Statistical data is biased and/or inconsistent**

Statistics and samples are sometimes small, inconsistent and either mask or bias findings. A list of examples:

- a. **Small sample sizes:** The parking survey was conducted with only one day of data (Traffic Assessment section 4.7.1) on a day when only 12 students stayed for after school activity compared to other sports days where far larger numbers of pupils and parents are involved. This seems like a very sparse data sample to be used to characterise the current parking situation or to predict future parking trends. This is important since parking shortage is one of the most critical issues cited by neighbours even at the school's current enrolment of 131 pupils.

Additionally, the Travel modal data (sections 3.10, 3.11, 4.5) consists of a sample size of just one day per year and this data is from a hands-up survey of pupils. This data is very importantly used to predict future trends in parking availability due to modal shifts away from car/driver trips and also used to predict transportation modal shifts themselves. Again, this seems a painfully small

sample of data to be used to predict long-term, complex, modal shifts. DNA and their independent traffic consultant believe the forecasts of future transportation modal shifts are unrealistic as a result of the biased, small sample sizes and overly optimistic thinking of the school and the assessor.

- b. **Inadequate measurements:** The speed survey (Travel Assessment section 4.4) uses a smallest recording interval of 0-20mph which does not provide enough granularity to properly analyse traffic flow impacts during peak hours. This interval is too large to distinguish between static vehicles and those moving at up to 20mph. This is a significant issue on roads with large speed bumps where traffic usually flows at close to 20mph at non-peak times. Recording intervals of 5mph, would have been far more appropriate and would have provided critical data on true traffic rates during peak school drop-off and pick-up times. The DNA neighbours' survey established that over 45% of Gloucester Road residents had observed complete traffic stoppages of over 5 minutes 3-5 times per week during the times of Denmead drop-off and pick-up. The use of a 0-20mph as the smallest measured flow rate does not bear out the facts and in fact masks the extent of known and frequent traffic stoppages in the area.
- c. **Invalid Comparisons:** The 2008 modal transport data (Travel Assessment section 3.10) includes both Gloucester Road and Wensleydale Road sites. 2010 and 2011 modal transport data is made for the Gloucester Road site only. It is from this 2008 survey that the assessment draws many conclusions as to the effectiveness of the school's travel plans by comparison of year on year changes to different modal figures; the main being the shift from Car/Driver trips. Without separating out the Wensleydale Road site in 2008, any measure and/or comparison applied to Gloucester Road only samples is therefore biased. Additionally, both June 2010 (section 3.4) and March 2011 (section 4.5) modal data was measured on good weather days. There is no mention of weather for the 2008 survey and there could be considerable bias in walking vs. driving statistics and modal shifts.
- d. **Inaccuracies and questionable assumptions:** The analysis states that the footpath on the northern side of Wensleydale Gardens extends all the way to the Carlisle Park pedestrian entrance whereas it stops well before this. It also makes other questionable assumptions, e.g. that there will no increase in teacher and other supporting service vehicles and no increase in student numbers at Denmead's Wensleydale Road location.

### **Study omits some important school-related impacts**

The current study makes no effort to gather, measure, analyse, or report data on some of the most onerous impacts of the school and any increase in enrolment including illegal parking, vehicle damage, and traffic accidents. Additionally, the study does not include analysis of:

- Health, Safety, and Environment impacts to the community of any increased traffic or additional parking shortages due to the pupil expansion. With many vulnerable residents, children, and pets in the immediate area, this impact is a genuine concern.
- Numbers of residents who currently avoid parking in front of their homes or travelling during peak periods due to the already problematic school traffic situation.
- Existing and new traffic generated by Carlisle Infants School, Tadpole Nursery, Hampton railway station, the new Waitrose etc.

### **The school's traffic survey process was not conducted independently**

It is our understanding that the traffic study was not conducted in consultation with the borough and it is not clear that it followed local authority guidelines. Furthermore, staff and parents are likely to have had some awareness that the survey was being carried out and this may have affected their behaviour.

### **Denmead School Travel Plan**

The school's planning application contains ambitious statements about how the school plans to reduce school-related traffic. We believe these statements are totally unrealistic and we also believe that the school's claims about its past success in reducing traffic should be treated with caution. At best, the school achieved a very modest improvement between 2009 and 2010 and has made no progress since. We believe it unlikely that they will achieve any further significant reductions; on the contrary, we believe that increasing the numbers of pupils could worsen the modal split as more pupils would be likely to come from further away. The key points we would make about the school's travel plans are:

- the figures about past and current modal split should be treated with caution. The last two surveys were done in the summer, so are likely to understate car use. They are also likely to overstate car-sharing because respondents are likely to be keen to give this response if at all they can (e.g. if they occasionally take someone but generally do not). It should also be noted that the final survey was undertaken in March 2011 just before the school was about to launch its initial consultation on redevelopment of the site when staff and parents were likely to be aware that traffic would be a major issue.
- even on the school's own figures there was only limited improvement between 2009 and 2010 and no significant improvement between 2010 and 2011. Therefore the most likely scenario is that current splits will not change much due to the school's efforts. Specifically:
  - a. the June 2010 modal split survey has 76% of Gloucester Road pupils coming to school by car (Car Driver or Car Share), while in the March 2011 survey the figure is 75%;
  - b. the evidence of the last two years suggest they are unlikely to make any progress on cycling - 2% in June 2010, 2% in March 2011 and yet projected to rise to 5% and does not support their plan for walking - 5% in June 2010, 9% in March 2011 and projected to rise to 20% according to the school or 17% according to their consultant.
  - c. a larger school is likely to mean a larger catchment area so if anything the splits are likely to worsen.
- Some of the data is inadequate to justify the conclusions drawn from it, e.g. a total of eight teachers responded to the March 2011 survey out of a total staff of 30, (18 full time, 12 part time). However, the Buchanan report treats this as a response rate of 45% and uses it as a basis for claims and projections.
- The school's analysis uses borough-wide statistics in a way that is unreliable and misleading, e.g. Table 3 in the Buchanan report shows modal shift in the Borough as a whole, using values for combined junior and secondary schools. This is a ridiculous comparison to use to justify the likelihood of a modal shift to cycling or bus use, especially bearing in mind the fact that on the school's figures 82% of pupils live more than 1 km away from the school. How many 9 year-olds are going to cycle to school along the A308, across the A316, or down Hampton Hill High Street in the rush hour? Let alone younger children.
- The school claim provision of limited staff parking on the site (10 spaces plus one space for visitor parking and one disabled space) will provide some relief, but:

- a. our observations suggest that until recently 4 members of staff were regularly parking on the site;
- b. the staff car park will only be open in the mornings until 0815 and from 16.30 in the afternoons, so any staff arriving late or wanting to leave quickly at the end of the day will not be able to use the staff car parks;
- c. the school's claim that they are going to run a significantly bigger school with no staff increase seems implausible;

In our view the on-site car park will at most reduce by 6 the number of staff cars parked on Gloucester Road, but in practice the reduction is likely to be smaller.

- central to the school's claim that their plans would actually reduce the amount of school-related traffic in Gloucester Road is their suggestion that half of classes would be forced to use the Carlisle Park car park as a dropping off point, but
  - a. we understand that the council parks department has NOT agreed to this
  - b. the school claim that 43 cars might use the Carlisle Park car park as a dropping off point rather than Gloucester Road, but it is inconceivable that the narrow single track park entrance will tolerate 43 in-coming journeys as well as 43 out-going journeys in the 20-30 minute period during which school drops-offs occur.
  - c. the school's own consultants accept that even if the council parks department were to agree to Carlisle Park car park being used as a drop off point, the school would not be able to enforce compliance and that use of Gloucester Road is likely to prove more attractive to parents.

Overall, we believe that the school's claim that they can improve the traffic situation while increasing pupil numbers is totally unrealistic. A more realistic assumption is to assume that the modal split will remain fairly constant. The school's travel consultants state that with unchanged behaviour increasing pupil numbers by 45 (from 131 when the traffic calculations were done to 176) would generate 27 extra car trips (Buchanan report 8.1.8). They do not explicitly show how they arrived at this figure, but if you assume that 57% of the 45 new pupils come by non-shared car and 18% come by car share, this would give a total of approximately 30 extra car trips. Either figure supports the obvious conclusion that a dramatic increase in pupil numbers is likely to lead to a dramatic increase in school-related traffic issues. Given the unacceptable nature of the current situation during school drop off and pick up times and the fact that non-school related factors are anyway likely to exacerbate the traffic problems, it would seem reasonable to conclude that no increase in pupil numbers using the site should be allowed.

## **Zoning of Land as Other Open Land of Townscape Importance (OOLTI)**

The application site is zoned as 'Other Open Land of Townscape Importance' (OOLTI). The LBRuT Adopted Development Management Plan Nov 2011, Core Strategy 4 Protecting Local Character and Policy DM OS 3 is relevant. Core Strategy 4 states:

*"4.0.2 Protecting local character was identified as a theme of the Core Strategy recognising the borough's unique character. The Council wishes to conserve and enhance the best . . . open areas, . . .*

*An important aspect of this is to ensure that new development is in tune with its setting "*

Further, Policy DM OS 3 states:

*"Other open areas that are of townscape importance will be protected and enhanced in open use."*

### **The Existing Site**

The site of the proposed development has been a playing field site for decades, and the dominant building is the modest red brick sports pavilion (Jubilee Hall) which has a pitched roof. There are also three unobtrusive single storey flat roofed classrooms (one subject to a temporary, now lapsed, consent). The buildings blend in well to the surroundings. All are ancillary to the main Denmead school which is located in Wensleydale Road and houses the Head's office and administrative functions.. The views, across from Carlisle Park to the east reach through the site to the houses that face on to Gloucester Road, to the north to the houses on Scotts Drive, and to the south to the line of trees and houses in Wensleydale Gardens. These views are not impeded by buildings in any significant way. The Gloucester Road site provides long views and a very pleasant sense of openness.

### **Local Character**

**North, east and south of the site** are relatively modest two storey houses, built between 40 and 90 years ago. All have pitched roofs of red/dark tile, and the predominant building material is red brick.

**On the fourth side is a public park**, Carlisle Park, designated as a Public Open Space. The park is well used by all ages and much valued by many people in the area. It is a triangular shape with lines of mature trees in its central area in addition to well-established trees and shrubs round its perimeter, and a paved path all the way round. It also has on its north side, away from the site, a pavilion, park keeper's office, tennis courts, bowling green and further pavilion, and two children's playgrounds. The main vehicle entrance to the park is to the west (again, away from the site), and there is a small car park on that side. There is a small pedestrian entrance to the park in Wensleydale Gardens, and a further entrance from Carlisle Road which is normally for pedestrians only but is sometimes used by parks vehicles.

**The central area of Carlisle Park** is used for everything from cricket nets to picnics, but is increasingly used by the school for its sports activities, which seem to have grown in number over the last two years. The school has access to the park via a gate in their western fence

### **The Proposed Development**

**Size/mass of the proposed development:** the proposed development consists of an enormous two storey light industrial style building, with double the floor area of the existing buildings on the site, and at least double the mass.

**Shape and materials of the proposed development:** the proposed building has the appearance of an ugly, light industrial unit and whilst the western elevation makes an attempt at a pavilion style, the solid white/grey wall dominates over the fenestration and furthermore the solid wall is set to be clad in brightly coloured tiles at a first floor level. There is not a single building in the neighbourhood which has been constructed in this style or with this appearance, which is totally inconsistent with the locality.

**The view from Carlisle Park now:** the scale of the existing pavilion does not appear to be very much different from that of the typical residential houses behind it in Gloucester Road. Because the pavilion roof is lower than the Gloucester Road houses behind, and the size, style and materials are consistent with surrounding properties, the eye is drawn to a focal point well beyond the pavilion itself. The effect of this is to make the pavilion building appear smaller than it is. It blends in well.

**Comparison of the view with the proposed development:** the proposed building will be more than three times the size of the existing pavilion and span the width of the plots of five residential houses. The 8m high roof (in height) will mean it will no longer be possible to see the houses in Gloucester Road beyond. This, along with the bold design of the western elevation, will provide the principal focus for the eye and detrimentally impact on the view from the park. Furthermore the surround fencing for the MUGA pitches, which we fully expect to be 2m or even 3m high, will be very noticeable from the park, creating another contamination to the view.

Policy DM OS 3 states that in respect of land which is OOLTI:

*“It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria must be taken into account when assessing appropriate development:*

- 1. It must be linked to the functional use of the Other Open Land of Townscape Importance; or*
- 2. It can only be a replacement or minor extension of existing built facilities;*
- 3. In addition to 1. or 2., it does not harm the character and openness of the open land.*

*Improvement and enhancement of the openness and character of other open land and measures to open up views into and out of designated other open land will be encouraged where appropriate. “*

## **Functional use**

**The use of the existing site** is playing fields with sports hall and ancillary classrooms, and the site is ancillary to the main Wensleydale Road school site. The planning history makes clear that both the school and the Council are agreed on this. The full planning history is set out in Appendices C and D to this submission, but a brief history makes the site’s use and status clear:

## **Brief Planning History**

**1977 The first two classrooms.** The site then consisted of a playing field with a sports pavilion: consent was given for two single storey prefab flat roofed classrooms, initially on a temporary basis but later made permanent. The original application included a pitched roof; this was refused on the basis the pitched roof would be “an obstructive feature detrimental to the visual amenities of adjoining residential properties”. The land was then zoned as “Private School – Playing Fields”.

**1985 Sports Pavilion.** The existing sports pavilion was in poor repair: consent was given for construction of a new sports pavilion, the Jubilee Hall. The file shows concerns about the size of the structure and its height, and also noise and disturbance.

**1985 conditions.** Consent was granted subject to:

**Condition 61 on use:** “ that the premises only be used for school sports activities . . ancillary dining hall . . linked to . . on the playing field site.” Note change of zoning to Open Space/Private Playing Fields. The reason given is: “To enable the Planning Authority to control the indiscriminate growth of general school and other non-school activities on site which could prejudice the amenities of the neighbouring residential occupiers and the viability of the site as a sports ground.”

**Condition on hours of use:** the premises shall not be used except between the hours of 9.00 am to 5.00 pm Monday-Friday inclusive without the prior written permission of the Local Planning Authority. The planning file also notes: “The Applicants have stated that there would be no increase in the existing level of school activity . . use . . would be confined . . to normal school hours. . .”

**Assurance by school on pupil numbers** 22 March 1985: “We would again confirm that it is in no way intended to either increase the number of pupils using the facilities at this part of the school, or to increase the use of the main school buildings in Wensleydale Road”

**1992 The Third Classroom** Consent given to add a third prefab classroom, again single storey and flat roofed, and slightly sunken, on a 5 year temporary basis.

The site then took boys up to 13, and the extra space was said to be needed to provide space for IT and DT, plus a storeroom for the equipment. Comment on the planning file includes: “As confirmed by the applicant’s supporting letter the proposal is not directed towards an increase in pupils but rather to creating more room . . . . for the expanded National Curriculum.”

Denmead now teaches up to 11 only, rather than 13, and we believe the room is currently a classroom.

**Assurance by school on pupil numbers:** the file shows concern about the impact on the park, on residents, and screening. There is a letter from the School of 14 April 1992 “ . . I write to state that it is not the school’s intention to increase the number of pupils at the Gloucester Road Department should planning permission be granted for these additional educational facilities.”

The temporary consent for this classroom has been renewed every five years until December 2006, so the existing consent may now have expired.

## **Criteria for development in OOLTI**

Although there is provision in the policy for development in exceptional circumstances the proposed development does not meet the criteria suggested in the following ways.

**Criterion 1:** link to functional use: if the school were to replace the existing buildings on a like-for-like basis the proposed new accommodation could be reduced by nearly 50% and it could comfortably be built on a single storey. The replacement building/s could thus be located in the same place as the existing ones. At least 44% of the space in the proposed building can be attributed to additional (new) amenities and facilities, along with stairwells, lift shafts and plant rooms sufficiently sized to serve a two storey building of this size and offices for the headmaster, deputy head, administration staff and so on. This proposed expansion would change the use of the site to a stand-alone school, and as such is not linked to the functional use of the land as a playing field site with classroom accommodation. It therefore does not fulfil criterion 1.

**Criterion 2:** the proposed development could not be described as either a replacement (it is double the size) or a minor extension of the existing buildings so it does not fulfil criterion 2.

**Criterion 3:** the proposed development also fails to meet criterion 3, as being destructive of the character and openness of the open land for the reasons outlined above, namely mass, height, shape and materials which are out of character with the surrounding area and impact adversely on the openness and natural appearance of the site.

### **Character as OOLTI (s.4.1.8)**

**Impact of building:** this site at present is predominantly open and natural in character. It gives long views from Carlisle Park of grass and trees, and increases the sense of space as the park is bounded on the other three sides by housing. 58% of those surveyed were concerned about the overuse of Carlisle Park as a result of the school's proposed expansion. Concerns included extra use of pitches and additional parking. The proposed development would, because of its mass, warehouse-style shape and materials, adversely affect the character of the area, and form a focal point for the views into and across the school site that is out of keeping with the area and very obtrusive.

**Loss of natural surfaces:** the proposed large building, plus the car park areas and hard surfacing, together with the MUGA pitch and its accompanying fencing, which we would expect to be 2 to 3 metres high, are all artificial and in conflict with the natural character a site zoned as OOLTI should preserve. The MUGA pitch would not provide a habitat for birds or insects. It is worth noting that out of school hours the grass areas are currently used by birds, including blackbirds, pigeons, starlings, thrushes, and in winter redwings. See Ecology/Trees for further comment.

### **Conclusion**

We consider that the proposed development would be out of tune with its setting, would harm the character and openness of the land, and would reduce the area of natural (as opposed to artificial) green land on the site.

The proposed building might be in keeping with the large school buildings at the main Hampton School site, surrounded as they are by very extensive playing fields and distant from housing, but in a small site such as this one the proposed building would dwarf and dominate its surroundings, destroying local character. The proposed development appears to have been designed without

sufficient reference to either the character of its surroundings or the OOLTI policy applicable to the site.

## **Local Character and Neighbourliness - Design and Layout**

We refer to the London Borough of Richmond Upon Thames Adopted Development Management Plan Nov 2011, Policies DM DC 1 and DM DC 5 and we object to the application on the grounds that it is contrary to a number of articles comprised in these policies.

DM DC1 on Design seeks to ensure development is compatible with local character including relationship to existing townscape and frontages, scale, height, massing, proportions and form. DM DC 5 is concerned with Lack of Neighbourliness.

DM DC1

“Development must . . .respect local character . . .and connect with, and contribute positively to, its surroundings based on a thorough understanding of the site and its context.

In assessing the design quality of a proposal the Council will have regard to . . . . compatibility with local character including relationship to existing townscape . . scale, height, massing, proportions and form . . detailing and materials”

## **Local Character and the Existing Site. Please see OOLTI section**

### **Proposed New Building**

**Mass:** the proposed development consists of an enormous two storey light industrial style building, with double the floor area of the existing buildings on the site, and therefore double the mass.

**Proportions and form:** the proposals call for a building which has the appearance of a light industrial unit and whilst the western elevation makes an attempt at a pavilion style, the solid wall dominates over the fenestration and furthermore the solid wall is set to be clad in brightly coloured tiles at a first floor level. There is not a single building in the neighbourhood which has been constructed in this style or with this appearance, which is totally inconsistent with the locality.

### **View from Carlisle Park (Public Open Space):**

**As the view is now:** the scale of the existing pavilion does not appear to be very much different from that of the typical residential houses behind it in Gloucester Road. Because the pavilion roof is lower than the Gloucester Road houses behind, and the size, style and materials are consistent with surrounding properties, the eye is drawn to a focal point well beyond the pavilion itself. The effect of this is to make the pavilion building appear smaller than it is.

**Comparison of the view with the proposed development:** the proposed building will be more than three times the size of the existing pavilion and span the width of the plots of five residential houses. The height of the roof (8m in height) will mean it will no longer be possible to see the houses in Gloucester Road beyond. This, along with the bold design of the western elevation, will provide the principal focus for the eye and detrimentally impact on the view from the park. Furthermore the surround fencing for the MUGA pitches, which we fully expect to be 2m or even 3m high, will be very noticeable from the park, creating another contamination to the view.

**Policy in relation to the proposed building design;** the foreword to the DMP mentions that “policies generally preclude taller buildings”, and see sections 6.1.4, 6.1.6, 6.1.7, 6.1.8 and 6.1.10, for examples. 6.1.4 states “The Council will generally be opposed to any development or re-development that will be out of scale with existing surrounding developments”. 6.1.10 states “Development should be in harmony with surrounding buildings” and “Development should be in scale with the adjoining buildings”. 6.1.10 “new design need not imitate architectural forms but should “recognise the rhythm, height, proportion” of existing properties”. The proposed development, however, does not respect the local character; it is on a much larger scale to the surrounding and adjoining buildings. It is not in harmony with surrounding buildings and it fails to contribute positively to its surroundings

**Policy on replacement of existing buildings:** turning now to the fact that the proposed development is actually a replacement of existing buildings, we note that article 6.1.6 states “Where a building or plot is part of an existing pattern of development with an identifiable and consistent form, there will be a presumption against its replacement with a unit or units which do not reflect the prevailing pattern of development and local character” and article 6.1.9 states “Very good reasons would be needed to justify a substantial deviation from the existing building alignment” . The existing building pattern and style derives from a series of planning decisions that gave due regard to the neighbours, that is to say single storey; flat-roofed; in one case even sunken; classrooms, positioned to be unobtrusive to neighbouring properties and cause minimum adverse effect on the view from Carlisle Park

**Comparison with proposed development:** in seeking permission for the proposed development, the applicant has chosen to ignore the pattern of development and given inadequate and unacceptable reasons for the deviation from the existing building alignment. The applicant has stated that cost was the reason driving the proposal to relocate. Significant sums will be saved by keeping the pupils in their existing accommodation during construction. This would avoid the cost of temporary classrooms.

**Neighbours’ Views on building locations:** the proposal to build on an entirely new footprint is entirely at odds with the views of the neighbours, who indicated in their survey that 86% (see Annex Survey Results Summary) preferred any replacement building(s) to be positioned in the same place as the existing ones.

**Replace like for like on existing footprint.** We, the DNA, are clear that by replacing the existing buildings on a like-for-like basis the proposed new accommodation could be reduced by nearly 50% and that it could comfortably be built on a single storey. The replacement building could thus be located in the same place as the existing ones. At least 44% of the space in the proposed building can be attributed to additional (new) amenities and facilities, along with stairwells, lift shafts and plant rooms sufficiently sized to serve a two storey building of this size and offices for the headmaster, deputy head, administration staff and so on.

**Proposed increase in size for reasons which are of no benefit to the community:** Addition of the extra facilities and increase in building size may increase the appeal of the school to parents, but at the expense of the site’s status as OOLTI, the character of the neighbourhood, and the amenity of neighbours.

The school's case for increase in size per pupil BB99: the applicant has used BB99 guidelines as a space planning guide. BB99 suggests that 2 sq m per pupil should be allowed in determining the size of a classroom, hence the reason for 44 sq m class rooms in the proposed development to accommodate 22 pupils (x 8 classrooms = 176 pupils in all). There is actually no reason at all why the classrooms could not accommodate an additional 2 no. pupils each at some later stage, since BB99 is purely a guide, and is in no way legally binding

Actual capacity of proposed building: in fact the means of escape in the proposed building is sufficient for the safe discharge of 150 people from the first floor and comfortably more than 88 from the ground floor in the event of a fire emergency. The WC accommodation is sufficient for 120 pupils on the first floor and a further 100 on the ground floor; whilst there are enough toilets for more than 75 staff. We are therefore confident that the school building as proposed is sufficiently sized to accommodate more than 200 pupils and staff.

## **Previous Planning History**

The proposals are at odds with previous Planning history, which is summarised in OOLTI and set out in Appendices C and D

In order to understand how the current building design, size and layout have evolved, it is crucial to refer to the previous Planning Application history.

### **Key points from the Planning history:**

**1977 The first two classrooms** The site then consisted of a playing field with a sports pavilion: consent was given for two single storey prefab flat roofed classrooms, initially on a temporary basis but later made permanent. The original application included a pitched roof; this was refused on the basis the pitched roof would be "an obstructive feature detrimental to the visual amenities of adjoining residential properties". The land was then zoned as "Private School – Playing Fields".

**1985 Sports Pavilion** The existing sports pavilion was in poor repair: consent was given for construction of a new sports pavilion, the Jubilee Hall. The file shows concerns about the size of the structure and its height, and also noise and disturbance. Consent was granted subject to condition 61: that the premises only be used for school sports activities . . ancillary dining hall . . linked to . . on the playing field site. Note change of zoning to Open Space/Private Playing Fields.

The reason for the condition is given as: "To enable the Planning Authority to control the indiscriminate growth of general school and other non-school activities on site which could prejudice the amenities of the neighbouring residential occupiers and the viability of the site as a sports ground."

Condition: the premises shall not be used except between the hours of 9.00 am to 5.00 pm Monday-Friday inclusive without the prior written permission of the Local Planning Authority."

On planning file: "The Applicants have stated that there would be no increase in the existing level of school activity . . use . . would be confined to normal school hours . . ."

Assurance by school on 22 March 1985: “We would again confirm that it is in no way intended to either increase the number of pupils using the facilities at this part of the school, or to increase the use of the main school buildings in Wensleydale Road”

**1992 The Third Classroom** Consent given to add a third prefab classroom, again single storey and flat roofed, and slightly sunken, on a 5 year temporary basis.

The site then took boys up to 13, and the extra space was said to be needed to provide space for IT and DT, plus a storeroom, as equipment was involved. Comment on the planning file includes: “As confirmed by the applicant’s supporting letter the proposal is not directed towards an increase in pupils but rather to creating more room for the expanded National Curriculum. . . “ .

Denmead no longer teaches up to 13, and we believe the room is now a classroom. The file shows concern about the impact on the park, on residents, and screening. There is a letter from the School of 14 April 1992 “ . . I write to state that it is not the school’s intention to increase the number of pupils at the Gloucester Road Department should planning permission be granted for these additional educational facilities.”

The temporary consent for this classroom has been renewed every five years until December 2006, so the existing consent may now have expired.

To summarise, the planning history for the site indicates a wish to maintain an identifiable and consistent form of building and use of the land (single storey carefully placed unobtrusive buildings). This latest application is not consistent with the prevailing pattern of development and certainly not local character. It represents a step change to a greater magnitude of building size and a change of function to a stand-alone school. This process of encroachment on the site and the amenity of the locality and residents is contrary to policy and not in the interests of the residents, the wider community or the character of the area. The residents are also very concerned about the extrapolation of this process of expansion of buildings and pupils, consistent with the entire history of the site, unless the Planning Committee continues to protect the site and the area from this inconsiderate and inappropriate development.

### **Policy DM DC 5 Neighbourliness etc**

“In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy . . visual intrusion, noise and disturbance”

To protect privacy . . minimum distance of 20m between main facing windows . . “

“6.1.30 Adverse impact on neighbouring properties, including the most well-used part of gardens, can include. . overlooking, loss of privacy, pollution from noise or light and overpowering and obtrusive development. . .”

### **Proximity of proposed buildings to neighbouring houses :**

**Wensleydale Gardens:** the south wall of the proposed building would run parallel to the southern boundary of the site and the houses in Wensleydale Gardens, particularly nos. 23, 24 and 25. The 8m high wall will extend out almost completely across from the eastern boundary to the western boundary of No. 24, effectively filling up the entire rear view of the property, where the living and

bedroom areas look out, with a massive white/grey wall such as you might find on any industrial estate. The exact separation distance is hard to calculate exactly from the plans, but it appears to be about 20m to the building wall (not 25m as stated in the Design Assessment), and therefore less to the wide roof overhang. This is too close for such an overbearing and obtrusive building. There is some screening from existing deciduous trees, but the application makes no mention of planting trees in the substantial gaps in that screening, and of course the screening effect is only present in summer. Nor is there any mention of replacement should trees need to be taken down.

**Gloucester Road:** the proposed building is also very close to the ends of the Gloucester Road gardens, and spans the width of five houses. The rear of several of the gardens will suffer from overshadowing and loss of light, and in one house there is a building with a living area abutting the boundary, with a window on that side, where the separation distance will be no more than a few metres.

We submit that the application contravenes this policy.

## Noise and Disturbance

The LBRuTAdopted Development Management Plan Nov 2011, Policy DM DC 5 Neighbourliness, Sunlighting and Daylighting is relevant and we object to the application on the grounds that it is contrary to a number of articles in the policy.

*“In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.”*

*“6.1.30 . . The aim is to protect existing occupiers as far as possible from the unreasonable impacts of new development. Adverse impact on neighbouring properties can include,. including on the most well used parts of gardens . .and .can include . . pollution from noise”*

## The Current Situation

The DNA Survey showed that residents adjacent to the site had noticed a gradual increase in noise and disturbance over recent years.

- Generally, respondents had a problem with noise and disturbance from weekend and evening activities, noise from sports activities, shouting and loud music. These can be at weekends or during the school day, and is more of a problem in the afternoons. There was concern about the existing out-of-hours usage being extended
- Again, growth in pupil numbers is seen as leading to a severe adverse impact.
- Sample Comment: “Sports days, school fair, fireworks, the operatic society, all intrude and are a nuisance. The normal school day noise is not a problem”.

Gardens on the North and South ends of the site are very shallow with open aspects. There is little screening on the Scotts Drive side to allow light in to the houses. On the south side (Wensleydale Gardens) the houses are also close, from about 7 metres to about 1 metre. Hence the residents are very sensitive to unreasonable noise and disturbance.

## The Planning History

Previous Planning history recognised the importance of neighbours’ privacy and the following extracts demonstrate how conditions and constraints were imposed to prevent unnecessary nuisance and disturbance to neighbouring properties.

1985 The Sports Hall      Granted subject to conditions:

- Condition No.61 “That the premises be used only for school sports activities [unreadable] ancillary dining hall linked to [unreadable] on the playing field site.
- Reason (part of condition 61): To enable the Local Planning Authority to control the indiscriminate growth of general school and other non-school activities [unreadable] on the site which could prejudice the amenities of the neighbouring residential occupiers and the viability of the site as a sports ground.”
- Condition (b): (in main body of grant) “The premises shall not be used except between the hours of 9.00 a.m. – 5.00 p.m. Monday – Friday inclusive without the prior written permission of the Local Planning Authority”.
- Reason – “Set out in the conditions attached hereto” which include 61 quoted above and also:

“To ensure the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties (applicable to condition (b).”

The experience of neighbours is that, in very recent years, the School has breached the condition on: ‘Out-of-hours’ usage. The Survey shows that the site is being used increasingly on weekday evenings and at most weekends during the summer and autumn terms. The use is not confined to sports, but is also used by the Denmead Parents Association for functions and, for example, a local operatic society’s series of rehearsals, all of which are very audible to neighbours. There are almost always a number of children who appear to play mostly unsupervised and who make a great deal of noise. Neighbours have complained about some evening functions at weekends that have been very noisy and obtrusive.

### **The School’s Proposals for expansion**

The DNA, believe that the School’s proposals would have an unreasonable impact on neighbours’ enjoyment of their properties and would be in breach of Policy DM D5 for the following reasons:

#### **Noise and disturbance from increase in pupil numbers**

The history of gradual expansion of buildings, pupil numbers and activities on the site has created the current unreasonable levels of noise and disturbance. Further increases would exacerbate these problems.

The following extract from the planning history demonstrates that the Council have recognised the conditions to apply:

- Letter from Denmead 22 March 1985

Answering questions put by the Planning Officers, confirming five points, including point 4, no change in hours of use, school time only, and:

“5. Any space which is relieved in the existing school by the use of the new building will be used to widen the educational curriculum and improve the facilities, and prevent overcrowding, for the same number of pupils as present.”

Further relevant extracts have been cited in the zoning section.

#### **Noise and disturbance from parking areas**

The proposed car park on site so close to the boundaries of neighbouring properties would cause unreasonable noise, disturbance and pollution, with potential danger to health. The depth of garden in 6 Scotts Drive on the car park boundary is only 2 metres.

#### **Out-of- hours use**

Given the School’s history of breaching its out-of-hours conditions in the past, the DNA look to the Council, to monitor and police the conditions. There is additional concern about the proposal for MUGA all-weather playing pitches. The presence of all-weather pitches and the increased number of inter-school competitions could lead to further unreasonable noise and disturbance out-of-hours. The proposed pitch is up against the boundary of some of the Wensleydale Gardens houses.

There is also a proposed cricket pitch up against the fences with Scotts Drive, with an obvious potential problem with cricket balls possibly causing injury/damage.

## **Conclusion**

All the above are facets of the same problem. We submit that the school is seeking to overdevelop this site, taking it beyond its capacity to carry out its activities without causing an unreasonable amount of noise and disturbance to its neighbours, contrary to planning policy. Its failure to observe the existing planning conditions does not give the neighbours confidence for the future.

## **Lighting & Floodlighting**

The LBRUAdopted Development Management Plan Nov 2011, Policy DM DC 5 Neighbourliness, Sunlighting and Daylighting and Policy DM OS 9 Floodlighting are relevant.

*Policy DM DC 5*

*“6.1.30 ...The aim is to protect existing occupiers as far as possible from the unreasonable impacts of new development. Adverse impact on neighbouring properties, including... pollution from noise or light and overpowering or obtrusive development.”*

*Policy DM OS 9 Floodlighting*

*“4.1.32 Floodlighting can enable the full use of outdoor sport and leisure facilities, but*

*consideration must be given to any demonstrable harm to biodiversity, residential amenity and local character.*

*4.1.33 Factors which will be taken into account when assessing proposals for floodlighting will be:*

- Effect on residential amenity and local area of the lighting: effect and impacts when lit in terms of sky glow, glare, light trespass, noise and disturbance from users; the appearance of the installation when switched off;*
- Any planned mitigation measures such as restriction on lighting levels and hours of use.*

*4.1.34 It is important that floodlights are designed to be as unobtrusive as possible when unlit, in terms of number, height, width, design, colour and siting. Light pollution should be minimised to protect biodiversity as well as residents, passers by ...*

*4.1.35 If permission is granted, conditions or an agreement may be imposed to restrict the lighting levels and times of use, or to implement other measures to minimise possible adverse effects such as post-installation requirements and monitoring, both within the site and on adjoining land. “*

We object to the application on the grounds that it is contrary to a number of articles in these policies.

By “floodlighting”, we mean the high-intensity security lights that effectively light up a wide area and remain switched on throughout the night.

### **The current situation**

Prior to January 2011, there was only low level security lighting on the single storey classrooms. In January 2011, new high intensity lighting was installed both on the front and north end of Jubilee Hall and the lighting on the single-storey classrooms was replaced with much brighter lights.

The high-level, high-intensity lights on Jubilee Hall are used as floodlights for the sports pitches in late afternoon and after school hours. Neighbours in Scotts Drive have complained to the School on a number of occasions this year about the new bright lights. The lights literally light up the bedrooms of the homes on Scotts Drive and cause disturbance to sleep. Two homes facing the site on Scotts

Drive have young children who go to bed in the early evening. Both families have been affected by the effects of light trespass and the children's sleep has been disturbed. The houses in Wensleydale Gardens are also affected by glare as the lights from Jubilee Hall are such that they shine straight across into the bedrooms and gardens. During summer the trees provide some screening, but the line of trees is incomplete and the trees are deciduous.

After a number of occasions when the high-level, high-intensity lights were left on all night, some neighbours complained and the School agreed to switch off the lights facing the sports pitches after school hours. However, the other lights (on Jubilee Hall and on the classrooms) remain on all night. Whilst they are not floodlights as such, they still emit a very strong glare that causes disturbance to some homes on Scotts Drive. These are very shallow, approximately 5 metres deep so light easily reaches the buildings.

The high-level lighting on the north-facing wall of Jubilee Hall also causes disturbance to some homes in Gloucester Road.

### **What the DNA Survey said:**

Eight residents commented on the problems caused by security lights, with the Jubilee Sports Hall being mentioned in particular.

Sample Comment: "High intensity security lights are positioned all around the buildings. These shine all night every night: whether in term time or not (they are not linked to motion sensors). Standard curtains/blinds are unable to shield all the light and annoying light shines into bedrooms".

### **Extract from Planning history**

2006/3514 Continued use of temporary classroom

#### Detailed Informatives:

U21525: "The applicants are requested to investigate ways to minimise light pollution caused by security light added to the west elevation of the building."

Note that neighbours' complaints about screening and security light prompted the second condition and informative.

### **The proposed new development**

The planning application does not reveal detailed plans for lighting on the re-developed site. We can only assume that the greater height and scale of the building will require a concomitant increase in lighting, potentially exacerbating the problem of light pollution and trespass.

The proposed building's elevation view from Gloucester Road and proximity to homes on Wensleydale Gardens and Gloucester Road would mean that even more homes on Gloucester Road would be affected by light trespass, not only from security and floodlights but also lights from upper floor windows.

The proposed development of all-weather MUGA pitches to the south end of the site would suggest that the high-level, high-intensity lighting (or floodlighting) would be required to be switched on after school hours for after school clubs and inter-school competitions. This would cause disturbance and light trespass to neighbours in both Wensleydale Gardens and Scotts Drive.

We submit that the existing lighting contravenes policy already and this would be made worse because of the location and increased size of the building.

## Ecology and Trees

### Policy DM OS 5 Biodiversity and new development

“All new development will be expected to preserve and where possible enhance existing habitats including . . . biodiversity features, including trees. New habitats and biodiversity features should make a positive contribution to and should be integrated and linked to the wider green and blue infrastructure network, . . . where possible. “

### Planning Policy DM DC 4 states that:

“The borough’s trees and landscape will be protected and enhanced by . . . requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include new trees and other planting. Where trees are removed, appropriate replacement planting will normally be required.”

In addition Section 4.1.18 of The London Plan stresses the importance of a valuable series of habitats. Priority should be placed on linking new features and habitats into the wider green and blue infrastructure network, connecting fragmented habitat and increasing the size of habitat areas, which in turn increases a species’ resilience to climate change.”

### Change of site from grass to artificial surface – Loss of Habitat

We have looked at the Tree Constraints Plan (Doc no 11622359) which forms part of the ACS report and shows the site as it now is, and compared it with the Tree Protection Plan (Doc No1162363) which shows the site as it would be were the development to take place.

The site as it is now is nearly all grass; approximately four-fifths grass and one fifth buildings/hard surfacing.

After development the site, would have a much larger building, car parking, and two artificial sports pitches, and would be a predominantly artificial surface. Approximately, there would be less than one third grass and over two thirds artificial surface or building/concrete.

Whilst the artificial surfaces may be permeable, they do not provide food or habitat for birds or other wildlife. A number of bird species, often in quite large groups, use the playing fields and feed on the open grassland, when there is no activity in the school, Species frequently seen include starling, song thrush (a species listed in the London Biodiversity Action Plan) and in winter, fieldfare and redwing (migrants, and not that common), all of which need to feed on open grassland.

The change to artificial surface will represent a significant loss of scarce grassland habitat used by wildlife, and we submit that as such is not in conformity with policy DM OS 5 quoted above which requires habitat to be preserved.

**Tree planting:** In our view the reference to planting of trees does not go far enough. To maintain the habitat and corridor for wildlife, particularly along the southern boundary, and the appearance of the site, the school should be obliged to replace any trees that have to be removed, and fill in any gaps that now exist, with tree planting. Planting should be with native species, and should include

evergreens, such as holly, that could replace lost ivy (see below) as habitat and also provide year round screening for the houses that look out at the school. Care should also be taken to remove invasive species, as there is already a problem with false acacia in this strip that spreads aggressively and is of little value to wildlife.

**The South Side Tree Corridor:** at the base of the trees along the south side there is an undisturbed strip between the high chicken wire fence that stops footballs going over the boundary and the parallel fence of the actual boundary. There are piles of leaves and dead timber, and it is excellent habitat. Hedgehogs and the occasional stag beetle have been seen in the gardens adjoining the strip.

Please note that the boundaries shown on the plans submitted on the reports linked to environmental and tree matters do not reflect the actual boundaries of the school site. The boundary on the south side passes south of the tree trunks, which lie in school land (except for one slight deviation by No. 25 Wensleydale Gardens).

The Arboricultural Implications report calls for the removal of ivy from several existing trees. This ivy is much used for nesting by birds, including wrens, blackbirds, robins, and others. No removal of ivy should take place during the nesting season.

**Bird Species:** please note that the bird population is both larger and more varied than indicated in the application documents. Species noted as residents or daily visitors on school land include:

Wren, goldcrest, blue tit, willow tit, great tit, chaffinch, goldfinch, greenfinch, robin, nuthatch, blackbird, starling, thrush, redwing, fieldfare (the last two winter visitors to the playing fields), greater spotted woodpecker, green woodpecker, collared dove, wood pigeon, jay, crow, magpie, and ring-necked parakeet.

As some residents are much more aware of the wildlife in the boundary strip than the school is (the school is some distance away and has no windows nearby at present), we suggest the school might wish to consult with the residents on tree planting and other proposals for management of the strip, which has considerable value to wildlife.

Should the application proceed we submit that the applicant should

- be required to replace any trees on the site lost over time and to landscape the site by the planting of additional trees of suitable species so as to maintain existing corridors for wildlife and to enhance and fill in gaps in the tree screening for adjoining properties;
- preserve the corridor along the south side or elsewhere on the site as undisturbed habitat protected by fencing

## **Access**

We submit that the use of Wensleydale Gardens in the short term for construction traffic and in the long term for emergency traffic is contrary to planning policy.

London Plan Policy 6.3 is concerned with the impact of new development on the local transport network. Policy 6.3A states:

“Development proposals should ensure that impacts on transport capacity and the transport network, . . . at a local level, are fully assessed. Development should not affect safety on the transport network”

Policy 6.3B “Where existing transport capacity is insufficient to allow for the travel generated by the proposed developments . . . boroughs should ensure that development proposals are phased until it is known these requirements can be met, otherwise they may be refused. “ We also refer to relevant DMP policies referred to in the Traffic section of this submission.

The objections of the DNA to the proposed access arrangements in the application centre on the proposal that Wensleydale Gardens will serve as the access for construction traffic and then replace access from Gloucester Road as the school’s emergency access.

### **Situation**

Wensleydale Gardens, a wholly residential cul-de-sac with two hammerheads, was built in the 1960s and the access road is narrower than Wensleydale Road. As evidenced by the DNA Neighbour Survey, most of the residents there oppose the breaching of the cul-de-sac for construction purposes and then for emergency access. The reasons for the opposition are:

- the fear is that, despite, protestations to the contrary this may lead the school in future to press for permanent access. This is not an unfounded fear as it is clear from the Transport Assessment, citing the school’s own travel planning from at least 2008, that the governors were hoping not only to gain access for pupil drop off through Carlisle Park to the Gloucester Road site but also wanted to achieve access via other routes to the Gloucester Road site.

Wensleydale Gardens is unsuitable as an access either for construction vehicles or emergency vehicles due to:

- the limited carriageway width and the potential for damage to overhanging trees;
- the fact that the road in Wensleydale Gardens was not constructed as a main road expected to carry what would be intensive plant and HGV traffic for a substantial number of months;
- there is already extensive on-street parking by residents and commuters which means that cars are parked on both sides of the main access;
- the houses have shallow, unfenced front gardens so the impact of HGV traffic will be considerable and unpleasant.

### **Use for Construction Traffic**

**Parking Restrictions Proposed:** the applicant states (s. 7, Traffic Assessment) that extensive parking restrictions would be needed for the period of the construction. This would restrict the ability of residents to park outside their own homes.

- The house driveways are relatively short and any car larger than mid-size intrudes on to the pavement, giving residents no choice but to park in the road.
- In the hammerheads there is almost no kerb space for on-street parking, so that the limited amount of spaces that do currently exist are used to accommodate residents’ cars, visitors’

cars and in the summer when there are weekend sports activities or the cricket nets are in use a substantial amount of parking for Carlisle Park.

- Towards the south of Wensleydale Gardens, approaching the T junction with Wensleydale Road and close to the Denmead main site/pre-preparatory school, there is commuter parking every weekday, residents' parking and a great deal of parking by parents at drop-off and pick-up times for the school. As evidenced by the neighbours' survey, the road is frequently blocked as parents park and turn in the road and park on the bend at the mouth of the road. There are also problems with inconsiderate parking by some parents which prevents residents getting into or out of driveways.
- This proposal to restrict parking also takes no account of the impact this would have on access needed to provide care for elderly and disabled residents in the Gardens, many of whom have lived there since the 1960s.

**Highway Safety – Access gate to Carlisle Park:** the DNA wish to draw the attention of the Council to the existing, well-used pedestrian access to Carlisle Park. This lies about half way along on the western side of Wensleydale Gardens. It forms a narrow break in a solid hedge line of trees and already suffers from restricted intervisibility between vehicles travelling along Wensleydale Gardens and pedestrians who may be exiting from Carlisle Park. The situation is made worse by the lack of a pavement on the north side of Wensleydale Gardens, which means that everyone leaving the park must immediately cross the road to reach a pavement. This is not currently a major issue as the road and access is mostly used by local residents who know the situation, and also residents adapt their driving.

However, this park entrance creates road safety implications to be taken seriously if the cul de sac is to be breached and the road used by HGVs.

The Council should note that the school's Traffic Assessment incorrectly states that there is pavement all the way between Wensleydale Road and the Carlisle Park pedestrian entrance; this is untrue, as the park fence intrudes and the pavement stops opposite the entrance to the first hammerhead. It becomes a narrow concrete strip, often overgrown. Thus all park users have to use the pavement on the east side to approach the park, and then cross the road. - in practice many walk down the road.

**Possible conditions on construction traffic:** If LBRuT is so minded to accept that Wensleydale Gardens provides the least worst option for construction traffic then DNA would ask them to impose conditions to protect the daily lives of the residents as far as possible during the period of construction, for example, restricting the size of vehicles which could be used to deliver materials and plant to minimise impact on houses which have very shallow open-plan front gardens; limit hours for deliveries from the 7.30-20.00 in the application to more reasonable hours; carry out a survey of the road and the houses alongside to assess likely damage and provide a baseline for judging if any damage occurs.

### **Emergency Access:**

**No justification for use as emergency access:** all residents consulted in Wensleydale Gardens wish to see its status as a cul-de-sac restored after construction and that the school's aspiration for it to be retained as an emergency access should not be allowed.

The Gloucester Road access is currently the emergency access for the school and must therefore currently satisfy requirements for access. Despite this, the applicant claims that after construction a fire truck could not access the site safely.

We do not accept that this is the case, and understand that what the school has proposed is an aspiration rather than a response to a legislative requirement or standard. In addition, it will be seen that the design submitted makes access to the school more limited than currently. The proposed design should have sought to alleviate the pinch at the entrance point by alteration to the hall rather than making it worse. There is also no discussion of other possible steps which could be explored, such as fire hydrants, to improve fire safety and affect requirements for access.

**Parking and access:** if the access were to be retained after construction there could be permanent effects on parking and access for some residents in Wensleydale Gardens as parking restrictions such as yellow lines along Wensleydale Gardens might be needed to keep space clear for emergency vehicles. This, combined with pressures on parking and traffic mentioned above, would result in a significant loss of amenity for the residents.

**Implications for future use for other types of access:** The planning history of this site is one of incremental increase of the use of the site for purposes other than playing fields. Despite the promise that the re-developed school would house only 176 pupils there has been no consequent reduction in the size of the proposed building which could house over 200 pupils. Bearing this in mind, the residents of Wensleydale Gardens think it inevitable that the school will at some point seek to use this access for other, wider, purposes that open up the cul-de-sac to regular traffic flows. The residents are wholly against this as destructive of their amenity and regard the road as totally unsuitable for such use. Given the pressure on traffic and parking near any school, and the existing problems in Wensleydale Road and Gloucester Road, such concerns are valid

We submit that the proposals are inconsistent with planning policy and unnecessary. Construction traffic would be unsafe with a major impact on the amenity of residents, and the emergency access sought is unnecessary and self-induced, and again will adversely affect the amenity of residents now and in the future

## **APPENDIX C Planning Information**

## Denmead School – Gloucester Road

**Planning Information from email of 11 April 2011 (Derek Tanner, Richmond borough planning department)**

Date granted/refused	Description	Ref	Outcome
Feb 1977	Erection of single storey classroom unit at rear of building	DC/76/1320	Granted
May 1980	Retention and continued use of two single storey prefabricated buildings for classroom purposes	DC80/0177	Granted
Apr 1981	Retention of canopy on north eastern end of existing classroom building	DC 81/0058	Refused
June 1982	Erection of a canopy adjacent to south-east boundary of site, to be used as cycle shed. (Revised drawings received 26 <sup>th</sup> March, 1982).	DC 81/0971	Granted
May 1985	Erection of new sports pavilion	DC 85/0402	Granted
May 1992	Erection of temporary classroom	DC/92/0461/FU L	Granted
July 1992	Erection of temporary classroom	BC 92/0726/FP	Decided (no details)
July 1992	Details pursuant to Condition Bd06 (materials) of planning consent 92/0461/ful Dated 1/6/92	DC 92/0461/DD01	Granted
Jan 1994	Non Compliance with Condition La09	ENF 95/00029/EN	Received
Apr 1995	Details pursuant to condition La09 (screen planting) of Planning Permission 92/0461/ful Dated 1/6/92	DC 92/0461/DD02	Granted
Mar 1997	Continued use of temporary classroom	DC 97/0219	Granted

Aug 1997	Non Compliance with Condition La09	ENF 95/00029/EN	Case closed
Nov 01	Continued use of temporary classroom	DC 01/2857	Granted
Dec 06	Continued use of temporary classroom	DC 06/3514/FUL	Granted

## APPENDIX D Extracts from Denmead Gloucester Road Planning Applications

Extracts from Denmead Gloucester Road Planning Applications	
Ref	Extract
75/184	<p><u>Application</u>: only document we have so far (included in papers for sports hall application)</p> <p>For erection of timber classroom with pitched roof</p> <p>Refused: The proposed building, by reason of its size and siting, would be an obstructive feature detrimental to the visual amenities of the occupiers of adjoining residential properties.</p>
80/177  Retention of two temporary classrooms	<p><u>Draft Committee Report</u>: (Longhand note) “A current permission (ref 75/1171) for the retention of one of the temporary buildings expires at the end of this year.</p> <p>Permission (ref 73/1316) for the second temporary buildings expired on the 30<sup>th</sup> Nov 1978.</p> <p>The applicants have stated that they originally intended the buildings to be permanent but only temporary consent was granted. They wish the buildings to remain.”</p> <p><u>Development Plan</u>: “Private school – playing fields”</p> <p><u>Correspondence</u>: Letter 1.4.80 Chief Planning Officer to school – “how long are these buildings are likely to be required as my understanding was that they were originally intended to be temporary structures.” And also asking for justification for the extension.</p> <p>The school replied (11.4.80) that it had planned these two buildings as permanent structures; that the Council thought the buildings would not last as they were timber framed; that the buildings are in good condition and there is no reason why use should not be continued.</p> <p><u>Final note on application</u>: (Longhand) “Policy agreed no policy objections to permanent retention of buildings”</p> <p>No record of objections</p> <p><u>Plans</u>: Show the original pavilion and small adjacent structure, two temporary classrooms along north east boundary backing on to the</p>

	Gloucester Road houses to the east and Scotts Drive to the north.
1981/971 The bicycle canopy	<p><u>Application</u>: Erection of a bicycle canopy by south east boundary of the site. Drawings revised March 1982.</p> <p><u>Development Plan</u>: Open spaces not open to the public/private school playing field.</p> <p>Planning permission was refused on 15.4.81 for the retention of a similar canopy close to the north-east corner of the site. Enforcement proceedings were about to start when the canopy was removed. This application was originally for one with solid sides in the same (NE) location. An adjoining occupier objected on the grounds of noise. No further objections since the revised application was put in.</p> <p><u>Meeting 23.10.81</u> with Chairman of Denmead Governors and the architect: (Longhand) to discuss cycle racks, hard surfacing and rebuilding pavilion.</p> <p>Cycle Racks: Chief Planning Officer (CPO) suggested put behind classrooms as Gloucester Road houses have long gardens, but talk to neighbours first.</p> <p>Hardstanding: confusion about whether it was a renewal – note records no consent granted for hardstanding.</p> <p>Pavilion: school “concerned about the future attitude to school on site”. CPO said “at the time we were concerned about site becoming school site rather than SPF as on IDP but PP granted for retention of classrooms – I didn’t think it substantial departure – likely to be superseded by District Plan anyway . . .” “If they wanted to build over pitches that might be different matter and housing would be a substantial departure but it turned out that they wanted to build sports hall on site of existing pavilion which is falling down . . . I said main points they should have regard to is size of structure – keep to existing height and watch effect on adjoining residents – didn’t mind them squaring it off on the side away from gardens – don’t spread it any more than necessary – although no-one had a right to a view they think they have and would [ ? ] object. And wld be concerned if activities lead to additional noise and disturbance [appearance?] in principle ok . . .”</p>
1985 The Sports Hall	<p><u>Granted subject to conditions</u>:</p> <p><u>Condition No.61</u> “That the premises be used only for school sports activities [unreadable] ancillary dining hall linked to [unreadable] on the</p>

playing field site.

Reason (part of condition 61): To enable the Local Planning Authority to control the indiscriminate growth of general school and other non-school activities [unreadable] on the site which could prejudice the amenities of the neighbouring residential occupiers and the viability of the site as a sports ground.”

Condition (b): (in many body of grant) “The premises shall not be used except between the hours of 9.00 a.m. – 5.00 p.m. Monday – Friday inclusive without the prior written permission of the Local Planning Authority. “

Reason – “Set out in the conditions attached hereto” which include 61 quoted above and also:

“To ensure the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties (applicable to condition (b).”

Decided under delegated powers by CPO, one resident seems not to have realised what was happening til after work began, objected. (council letters were sent to Gloucester Road, Twickenham in error).

Development Plan: Open Space/Private Playing Fields REC4 and ENV6

Plan: old building seems to be the same width as the new one, but twice the depth, that is, it expanded out into the playing field towards Carlisle Park. Height no greater.

Longhand notes on application: Activities hall with changing rooms and servery. “The applicants have stated that there would be no increase in the existing level of school activity resulting from the proposal, use of the building would be confined to normal school hours and it would not be used as additional sport [unreadable] teaching space. The hall would be used at lunch times as a dining facility for classrooms on the playing field site. Pre-cooked meals would be served, but not cooked on the premises.

#### HISTORY

Temporary planning permission was granted in 1970 for the erection of a single storey classroom building on the site (70/1533). Permission for a second temporary building providing classroom dining room and staff room space was granted in 1973 (73/1316). The 1970 permission was renewed in 1975 (75/1171) and consent was granted for retention of both buildings on a permanent basis in 1980 (80/177).”

	<p>“Comments: It is considered that the development does not conflict with Policies ENV6 and REC4 which seeks to protect and enhance pockets of greenery such as private sports grounds and retain and improve sports facilities.”</p> <p>“Spoke to Mr. Millar Headmaster 30/4/85</p> <p>Activities Hall – replacement of existing changing rooms [?] sports activities /PE classes etc</p> <p>No cooking on site – servery</p> <p>No increase in use of school – improvements [ ? ] accom</p> <p>School [ ? ]</p> <p>No loss of soccer pitch – [ ? ] at moment and no further encroachment”</p> <p>Handwritten note:</p> <p>“Alan</p> <p>I think conditions of this type are necessary in view of past history – are they water tight?</p> <p>Transfer of dining to pavilion would release extra space in existing playing field classrooms enabling a better use of existing space</p> <p>No increase in activities state the applicants</p> <p>Noted”</p> <p><u>Letter from Denmead 22 March 1985</u></p> <p>Answering questions put by the Planning Officers, confirming five points, including point 4, no change in hours of use, school time only, and:</p> <p>“5. Any space which is relieved in the existing school by the use of the new building will be used to widen the educational curriculum and improve the facilities, and prevent overcrowding, for the same number of pupils as present.”</p> <p>“ We would again confirm that it is in no way intended to either increase the number of pupils using the facilities at this part of the school, or to increase the use of the main school buildings in Wensleydale Road.”</p> <p>Longhand Note: “Paul Burr - couldn’t refuse on highway grounds but interested to comment when info on traffic generation available”</p>
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<p>92/0461</p> <p>The Temporary Classroom</p>	<p><u>Letter from Denmead to the Planning Committee, 12 Mar 1992</u></p> <p>Denmead boys are aged 8-13. National Curriculum changes mean that IT and DT must be taught in accommodation shared with other subjects. One room is needed for IT, plus a storeroom. One room is needed for DT plus equipment, benches, tools projects etc, to accommodate groups of 15-20 boys. There is a need for accommodation “for the existing numbers in the School”. “This will give a chance to adapt existing building to accommodate new curricula.”</p> <p>Interestingly, there is a handwritten number on the letter at the bottom “108 TOTAL” - number of pupils?</p> <p><u>Planning Application</u>, under Observations to Development Control:</p> <p>“The site is defined as other open land of townscape importance in the deposit draft UPP. Policy ENV6 seeks to ensure that such land is not lost to other uses without good cause.</p> <p>There appears to have been a steady accretion of buildings round the perimeter of the sports ground. On policy grounds there would be a presumption against relaxing policy ENV6 in this case; however, the views of Urban Design should have been sought and these would be paramount.</p> <p><u>Professional Comment</u>:</p> <p>“ . . .The building would be located partly on a hard surfaced area alongside other school buildings on this part of the periphery of the site.</p> <p>In addition, the building would be substantially screened from Scotts Drive by an adjacent two/three metre high hedge. The perception of openness would not be significantly impaired when viewed from the adjoining dwellings as the top of the building would only just be visible above the top of the hedge from the highway in Scotts Drive.</p> <p>The school site is also viewed, however, from the adjoining Carlisle Park. From this viewpoint the building would be set against the backdrop of the existing school buildings located on the boundary with the dwellings beyond and it is therefore considered that the value and character of this open land would not be significantly affected by the development, particularly if additional screen planting is carried out.</p> <p>As confirmed by the applicants’ supporting letter the proposal is not directed towards an increase in pupils but rather to creating more room</p>

	<p>and improved facilities for the expanded National Curriculum. This coupled with the use of the building for computer use and as a craft workshop would not generate a level of noise significantly in excess of that which would normally be expected of a school use.</p> <p>In conclusion therefore the proposal seeks to improve the educational facilities of the school in accordance with policy HEP 9 and with increased screening provided it is not considered that it would have an adverse impact on residential amenity nor the quality of the overall site as open land of townscape importance. “</p> <p>Numerous letters of objection.</p> <p><u>Letter from Denmead to the Planning Committee, 15<sup>th</sup> April 1992</u></p> <p>“Further to Mr. Norris’s recent communication I write to state that it is not the school’s intention to increase the number of pupils at the Gloucester Road Department should planning permission be granted for these additional educational facilities.”</p>
2006/3514	<p><u>Continued use of temporary classroom</u></p> <p>Renewal of existing permission, no changes.</p> <p><u>Conditions:</u> LP02U USE “That this permission be for a limited period of five years only, expiring on the 27<sup>th</sup> November 2006 when the building hereby permitted shall be removed.</p> <p>Reason: The building by reason of its form of construction and design is not considered appropriate for permanent retention on land designated of townscape importance.”</p> <p><u>UDP Overlays and Constraints:</u> “Other Open Land of Townscape Importance (OOLTI)</p> <p>CARLISLE PARK                      Part only”</p> <p><u>Detailed Conditions:</u></p> <p>U12840: - see above</p> <p>U12842 Screen Planting</p> <p>“That supplemental planting be carried out along the west elevation in accordance with details to be agreed by the Local Planning Authority. REASON: to safeguard the visual amenity of neighbouring property. “</p> <p><u>Detailed Informatives:</u></p> <p>U21525: “The applicants are requested to investigate ways to minimise</p>

	<p>light pollution caused by security light added to the west elevation of the building.”</p> <p>Note that neighbours’ complaints about screening and security light prompted the second condition and informative.</p>
AE 23 May 2011	

## **APPENDIX E Transport Assessment by Motion Consultants**

Motion has been instructed by Denmead Neighbours Association to assess any transport-related concerns regarding the recent proposals to redevelop Denmead School, Gloucester Road, Hampton. This statement sets out the key issues associated with the plans as well as the inaccuracies identified within Denmead School's own impact assessment. The 3 main areas of concern include the following:

- Assessing the existing situation;
- Assessing the suitability of the proposed access arrangements; and
- Assessing the impacts of the Travel Plan.

### **Assessment of the Existing Situation**

#### Issues Identified

- Gloucester Road is already strained at peak times and cars parked along the road prevent the smooth flow of two-way traffic;
- The roads adjacent to Denmead School are also affected at peak times by the traffic associated with Carlisle Infants School and Tadpole Nursery;
- Residents already make a special effort to avoid parking on the road during peak times. This suggests a shortage of parking to accommodate both residents and school-related traffic simultaneously. Any additional traffic would cause further inconvenience;
- The existing traffic flows are likely to pose a risk to vulnerable road users (children, elderly, disabled);
- Issues such as illegal parking, vehicle damage and traffic accidents have yet to be assessed; and
- Facilities associated with the school proposals are also likely to be open at off-peak times. The development proposal may encourage additional traffic for weekend/evening sports matches etc at times when congestion on the adjoining highway network is lower and vehicular speeds may consequently be higher.

### **Assessment of the Proposed Access Arrangements**

#### Wensleydale Gardens

- It is proposed that Wensleydale Gardens will function as an access for construction traffic and emergency access;
- It is stated that Wensleydale Gardens is only 4m wide, and it is noted that on-street parking currently takes place within Wensleydale Gardens;
- On-street parking seems to occur on the south west side of the carriageway. However the north east side of the carriageway is restricted by overhanging trees and vegetation. This may obstruct high sided vehicles if they are forced (by on-street parking) to use this side of the carriageway;
- Due to the limited carriageway width, presence of on-street parking and overhanging trees, Wensleydale Gardens is considered unsuitable as an access for emergency vehicles and construction traffic (without prohibiting significant amounts of on-street parking);
- Should the School continue to promote this access for emergency vehicles and construction traffic it is recommended that swept path analysis is provided to demonstrate that such vehicles

can adequately use Wensleydale Gardens, without overrunning footways/verges etc. This should identify areas where on-street parking will need to be prohibited or trees will need to be 'trimmed' to enable further consideration by residents; and

- There is an existing (well used) pedestrian access to Carlisle Park, from Wensleydale Gardens. This pedestrian access is 'hidden' due to high vegetation/planting either side of the access and suffers from restricted intervisibility between vehicles (travelling along Wensleydale Gardens) and pedestrians that may be exiting from Carlisle Park. Whilst this is an existing situation the development proposals are likely to exacerbate this situation. In particular conflict between HGVs (associated with construction) and pedestrians may have serious road safety consequences. It is recommended that a roads safety study be carried out to assess the risks associated with this element of the proposals.

#### Scotts Drive/Carlisle Road

- Consideration has been given to a potential access from Scotts Drive to facilitate access to staff/disabled/minibus parking;
- Whilst the increase in traffic via Scotts Drive/Carlisle Road may have (as claimed) a negligible effect on the capacity of Carlisle Road, the percentage increase is significant and is likely to result in a material environmental impact;
- Additionally the traffic impact as assessed has been under-estimated as it appears that no account has been taken in respect to pupil drop-off/collection taking place from Scotts Drive/Carlisle Road. Whilst it is unclear if an access from Scotts Drive would be promoted for pupil drop-off/collection it is apparent that should this access form part of the overall access strategy, Scotts Drive is likely to become an attractive pupil drop-off point. This aspect is likely to significantly increase the number of trips carried out via Scotts Drive/Carlisle Road. As such the access strategy is likely to result in a significant loss of highway amenity for local residents of Scotts Drive and Carlisle Road (i.e. the ability for residents to park on-street, driveways being obstructed etc); and
- The School expects 1 daily delivery and 1-3 additional deliveries per week outside peak hours which should be taken into account when assessing the impact on Scotts Drive/Carlisle Road.

#### Gloucester Road

- It is proposed that access from Gloucester Road will remain as the main pedestrian entrance;
- The School assumes that the increase in on-site parking will reduce parking pressure along Gloucester Road. However when taking into account the additional traffic associated with the increase in pupil numbers, the reality may be that parking pressure is not reduced. Little information is provided on the anticipated location of pupil drop off. The proposed access strategy is likely to focus this activity within Gloucester Road or within Scotts Drive/Carlisle Road. Clarification should be sought on the anticipated split between these two accesses to determine the impact, in respect to parking demand, that the development proposal will bring to Gloucester Road; and

- Without the above analysis it is not robust to conclude that on-street parking pressure will decrease along Gloucester Road. All trips are likely to impact on Gloucester Road and affect the conditions within the road particularly at peak times.

### Travel Plan

- It is suggested that the Travel Plan, which it is understood is already in operation, will reduce car travel from a current 57% to a target of 40% by 2013. This equates to a change in trips by car of circa 30% over a one to two year period. Such a high percentage change in private car travel is considered unrealistic (even if a Travel Plan were not already in place) and it is suggested that even if more robust Travel Plan measures are promoted a more reasonable target would be a change of 5%. For the avoidance of doubt, a 5% reduction in car trips will result in less than a 3% reduction in the modal split i.e. the modal split will reduce from 57% to circa 54%;
- The percentage reduction in car trips seems to be at odds with the provision of parking on-site. Such provision is likely to increase the attractiveness of driving to the site and as such is likely to have a negative impact when considering the modal shift away from the private car. In such cases where parking is provided, a reasonable Travel Plan target may be to maintain the status quo in respect to travel by private car, rather than achieve an unrealistic reduction;
- Similarly ambitious claims are made in respect to the anticipated modal shift associated with sustainable travel options; and
- As a result the long term traffic impact of the development proposals has been underestimated.

### **Recommendations for Further Consideration**

Conduct appropriate traffic surveys to establish accurate baseline data for traffic flows and existing levels of parking stress. Such survey should include parking stress surveys within the vicinity of the site and roads likely to be affected by the proposals, and traffic surveys (by Automatic Traffic Counters) to assess vehicle flow, vehicle classification and vehicular speed with Gloucester Road, Scotts Drive/Carlisle Road and Wensleydale Gardens;

Carry out a more reliable assessment of the effectiveness of the Travel Plan;

Should access be provided via Scotts Drive then it is recommended that an assessment of pupil drop off/pick up trips via Scotts Drive/Carlisle Road. The assessment should include a parking stress survey (to establish base line on-street parking levels), predictions of how many parents/careers (and associated vehicles) will use Scotts Drive/Carlisle Road, and estimated duration of stay (i.e. how long vehicles will park); and

Provide swept path analysis for emergency and construction vehicle access via Wensleydale Gardens; and

Carry out a road safety study to assess implications of construction traffic using Wensleydale gardens with particular reference to the existing pedestrian access to Carlisle Park.

Kind regards

Steve

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