

Planning Application 13/2102/FUL
DENMEAD SCHOOL, GLOUCESTER ROAD SITE

STATEMENT OF OBJECTION
DENMEAD NEIGHBOURS' ASSOCIATION

1. Quick view – One page summary of objections

2. Key objections from DNA

3. Planning Statement from Bell-Cornwell Chartered Town Planners (**Appendix A**)

4. Traffic Report from RGP Transport Planning & Infrastructure Design Consultants (**Appendix B**)

5. Building capacity advice from John Symes FRICS of AOS Studley (**Appendix C**)

The following documents are attached separately:

Annexe 1: Video and Photographic Evidence (CD & Hard Copy)

- (i) Highway Safety
- (ii) OOLTI & Neighbourliness

Annexe 2: DNA Neighbours' Survey

Annexe 3: Previous DNA Statement of Objections 11/4125/FUL
(Excluding Neighbours' Survey above)

DNA Objections to Planning App 13/2102 – One Page Summary

Who are the DNA? The Denmead Neighbours' Association (DNA) represents residents in the roads surrounding the application site. We base our objections on what they tell us, including a survey. We consulted with the school on the first application (11/4125), which was refused on traffic and highway safety grounds in December 2012. The school has not asked to consult with us since 2011.

Professional Planning Advice and Traffic analysis underlies our objections and is included here:

- Appendix A - Bell-Cornwell, Chartered Town Planners, and
- Appendix B - RGP Transport Planning and Infrastructure Design Consultants.
- Appendix C - Building capacity advice from John Symes FRICS of AOS Studley

Residents object to this proposal, but recognise the need to renovate: we strongly object to the proposal to build a warehouse-like, two-storey building (capacity 200+ pupils) and to increase pupil numbers. **To grant this application would be against Council policies on traffic and highway safety, open land, neighbourliness and noise /disturbance. Our objections are summarized below.**

- **Essentially the same application as 11/4125 which was denied planning permission.** Small changes: <2% reduction in size and improved access do not address core traffic and safety issues and the same reasons for refusal apply.
- **Same building capacity, estimated by AOS-Studley (see Appendix C) as 200+ pupils**
- **Increase in pupil numbers to more than the current 144 is still intended** (see S.3.9 Supporting Planning Statement Appdx K, Design and Access Statement), with no upper limit. No sanction or planning conditions (which would have problems with enforcement) are offered. The intention to discuss an increase with the council after traffic monitoring is mentioned. In effect the site could go up to its capacity of 200+ pupils without the residents – or the Council - being told or having the chance to put forward evidence until after it had happened. No predictive data is included (the Travel Plan referred to is not present). Minutes of a consultation in 2011 record that the school told us: “The financial constraints mean that 144 is not a viable number.”
- **School Traffic evidence is incomplete and flawed – see our Traffic Consultants’ analysis**
- Pupils use Wensleydale Gardens and Scotts Drive/Carlisle Road to reach the school gate in Carlisle Park for access. This is not measured or considered so the evidence is incomplete.
- Our traffic consultants calculated parking stress at 96% at pm pick up (near zero passing places) a value which makes congestion at current pupil numbers still very likely
- Reductions in pupil travel by car are incorrect. The data shows a 4% increase since 6/2010. There are errors and inconsistencies in the evidence, e.g., between the results of the School’s ‘hands up’ and snapshot surveys at 11%, and in these flaws make the data an unsound basis on which to identify changes in traffic levels and modal shift.
- **No justification for emergency access via Wensleydale Gardens:** as in the first application the existing fire access must be acceptable, and the new building would widen it. Any new access is likely to be opened up for wider use, and safety in Wensleydale Gardens is not considered.
- **Zoning as Open Land etc:** the building is out of keeping in style and size. The site would become mostly hard surface instead of grass, interrupted by MUGA fencing/nets. Many neighbours whose gardens are only 6m from the school grounds would be adversely affected by noise and disturbance, lighting, etc.

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INTRODUCTION

The Denmead Neighbours' Association (DNA) represents residents who live in the roads surrounding the Denmead School Gloucester Road site. It has surveyed the opinions of 120 residents in the adjoining roads and communicates with 130 concerned neighbours. The DNA, on behalf of the residents, opposes the school's planning application as it conflicts with the LBRuT's planning policies set out in Bell-Cornwell's advice at Appendix A.

Neighbours recognise the school's need to renovate the 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. The site was a playing field from the 1930s until the teaching blocks were put up in the 1970s. Since then it has been protected from over-development by planning policy. We urge the Council to recognise the constraints of this site and the unsuitability of adjoining roads for further traffic, and to reject the current plan which, like the first application, is based on expansion of the buildings, facilities and pupil numbers.

The DNA's view, as supported by the evidence it has obtained, is that this application appears to offer a different approach to the refused first application, but it is in fact for the same building, and the same development. The Application contains no proposal for effective and enforceable conditions on pupil growth, and once again seeks to open up a different access without justification. All these issues were raised on the first application, and the DNA asks the Council to reach the same conclusion it did on the previous application by refusing this application.

SUMMARY OF THE DNA'S OBJECTIONS

A letter of objection written by Ian Sowerby BA MSc MRTPI, a partner in Bell-Cornwell, Chartered Town Planners, is set out in Appendix A. This was written originally for the Chair of the DNA, but it is applicable to the application as a whole for residents affected and is adopted by the DNA with the agreement of Bell-Cornwell. It sets out the objections with reference to all relevant planning policies.

KEY POINTS

SECTION A: THE SCHOOL'S APPLICATION

- **Same development proposed as before:** the development is virtually identical to the first application (11/4125) which was refused on traffic grounds in December 2012.
- **Building capacity still unchanged at over 200.** In this new application the traffic evidence is based only on the current number of pupils, which is 144. As the building is unchanged, its capacity is at least 176 (as in the first application). In fact according to advice we have obtained - set out in Appendix C - the building has capacity for 220 pupils. This opinion is based on the planning application drawings, which are pdfs and not intended to be scaled. However, we are advised that the limiting factor in this design is WC capacity and that gives a maximum of 220 pupils.

- **Pupil numbers not fixed, no binding control proposed:** the intention to increase pupil numbers is still expressed, although it is not limited to 176. No prevention of or limit on pupil increase is proposed. Instead, there is this statement: “Based on this on-going monitoring, the School will then be able to discuss with the Council whether, in the future, any increases in pupils can be justified against the criteria of development plan policies, and if so by how many.” (See Appendix K to the Design and Access Statement, section 3.9). Despite this obvious intent, the application lacks any analysis of possible future impact of growth of pupil numbers. Even the Travel Plan referred to in Para 1.1.3 of Appendix E to the Design and Access Statement is missing from the application.
- The school told us at a consultation meeting on 28 June 2011 that “The financial constraints mean that 144 is not a viable number” (taken from the minutes).
- The discussions with the Council that the School suggest would not give the residents any opportunity to provide the Council with their views or to present evidence.

SECTION B - TRAFFIC AND HIGHWAY SAFETY

A planning report on this application is at Appendix A. This report identifies and considers the relevant planning policies and advises that this application:

“still fails to satisfy the development principles in DMP Policy DM TP 2 and London Plan Policy 6.3”,

Appendix B is a Traffic report commissioned by the DNA from Anthony Wares of RGP Transport Planning and Infrastructure Design Consultants. It contains an analysis of the school’s evidence and includes the results of a parking survey carried out on behalf of the DNA. Its conclusions are that there are several significant flaws in the school’s transport evidence and analysis.

- **Reasons for Refusal on grounds of increased traffic/highway safety remain:** the first application was refused on the basis that an increase in pupil numbers to 176 would result in increased traffic prejudicial to highway safety, contrary to planning policy. In this application, exactly the same issue is presented. When making the decision to refuse the Planning Committee considered the possibility of imposing planning conditions, but the advice was that they did not provide an effective control of pupil numbers so did not give the protection needed. The offered discussions with the Council do not provide a reliable means of ensuring that pupil growth does not produce exactly the breach of planning policies that gave rise to the first refusal. If this application succeeds, there is no exit route.
- **School Traffic evidence flawed – see our Traffic Consultants’ Analysis:** there are serious issues affecting the validity of the conclusions reached in the Traffic Assessment and other supporting documents – please see our Traffic Consultant’s report for a detailed analysis of the School’s traffic evidence. Key points are:
 - **No measurement of pupil access to Carlisle Park gate from Wensleydale Gardens or Carlisle Road/Scotts Drive:** the application relies on the new experimental access via Wensleydale Road/Carlisle Park as a solution to traffic

problems. None of the school's supporting documents mention, measure or analyse the daily use by parents and pupils of Wensleydale Gardens and Carlisle Road/Scotts Drive (cul-de-sacs) to reach the Carlisle Park gate. The only access described/measured is Wensleydale Road. This invalidates many of the report's conclusions. The school is simply redistributing the traffic problems in an unsustainable way and on a temporary basis to impact measured statistics for Gloucester Road and Wensleydale Road.

- **School parking beat survey underestimates parking stress:** the school's parking beat survey overstates parking space availability and underestimates parking stress, which our traffic consultants calculate at 96% at pm pick up (near zero passing places) a value which makes congestion very likely. This is crucial as residents evidence continues to be that traffic congestion and stoppages exist, even with current pupil numbers and aggressive school measures in place.
- **Consultants' evidence is consistent with residents' experience:** this evidence is consistent with residents' experience as noted in these objections and our survey and objections for the first application (see Annexes 2 and 3). The pattern residents observe is that the afternoon is worse than the morning, and that severe congestion continues to occur even since the experimental use of the Carlisle Park access. The parking places get used up, parents/carers park across driveways, the result is there are very few or no passing places and the road jams up.
- **See the Photo Evidence set out Annexe 1:** This supports the objections on traffic grounds, as it illustrates the congestion that occurs and the parking across driveways and on yellow zig-zags that prevents vehicles passing and creates highway safety risks. It also prevents residents getting into and out of their houses.
- **Incorrect statements about reductions in car trips:** both the basis for and the calculation of reductions in pupil travel to school by car in the school's evidence are incorrect. There are inconsistencies between the hands up survey and the snapshot survey of a magnitude that is larger than any identified improvement. There has in fact been an increase of 4% in the pupils travelling to school by car since 2010.
- **No information on School's plans for the future; no Travel Plan:** there is no information at all about future plans, or assessment of the impact of increased pupil numbers, and no copy of the school's Travel Plan (though it is included according to Appendix E, paragraph 1.1.3). The residents still experience regular lengthy congestion in Gloucester Road, on current numbers of pupils at 144, and with the experimental use of the access via Carlisle Park.
- **The problem has not been solved, it has been spread** to other local roads – there are rising numbers of new objections from Wensleydale Road residents

who live by the vehicle entrance to Carlisle Park who are affected, particularly by coaches waiting and at drop-off/pick up times.

- **Lack of sustainability of travel efforts/seasonal changes:** whilst the school may have been making efforts to influence parent/carer behaviour, the traffic conditions in the surrounding roads are still affected by congestion and by parent/carer parking. We note that on the afternoon of the day when the School's survey work was done the Traffic Assessment records a delay occurring, and this was in ideal conditions with parents probably well aware that the survey was being carried out (they would not have missed the traffic strips that had been down for weeks). During the survey period residents observed cars executing many more U-turns than usual, which reduced vehicle counts on the single traffic strip that were put down on Gloucester Road and Wensleydale Road. The location of the traffic strip in Gloucester Road could easily be bypassed by entering and exiting Gloucester Road from Broad Lane to the north, and dropping off at Carlisle Park at the Carlisle Road gate.
- The school has no direct control over what route parents/carers take when dropping off/picking up pupils, nor on where they park. There is no evidence that any improvement would be sustainable through winter weather/winter park closing hours, when the park closes between 4.15, and 4.30, and the 10 minute walk to or from Wensleydale Road can seem less attractive in cold or wet weather.
- We also note that the train service frequency in the Transport Assessment is incorrect in that there are only 2 trains an hour in the afternoon during the pupil pick up period, not 4, as the "loop line" trains via Richmond only operate later on during the rush hour. Residents also say they have never seen as many as 16 pupils go escorted to the coach service – 12 is the most they have seen.
- **Emergency/Construction Access** this application again seeks to open up Wensleydale Gardens for emergency and construction access without justification.
 - **No evidence to justify need for emergency fire access:** all the swept path analysis drawings relied on are incorrect as they show the old building layout, instead of the new one in this application in which there is a change in the building position near the Gloucester Road access that makes it wider. The School states that the change in building position "allows for the footprint to be repositioned at the entrance gate, allowing better access into the site" (3.6 Supporting Planning Statement, Appdx K to the Design and Access Statement) . Also, the school functions currently with emergency access via Gloucester Road, and there is no evidence offered that this is unsatisfactory. The letter from the London Fire and Emergency Planning Authority in the Design and Access Statement, Transport Assessment Part 2, Appx E does not make any statement about whether the existing fire access is satisfactory. The letter from JHAI on

behalf of the school states that it would “not be suitable”. We also understand that the Building Regulations referred to are recommendations rather than requirements.

- **All the evidence shows that access via Gloucester Road for ambulances is acceptable** so there is no reason to use Wensleydale Gardens.
- **Safety in Wensleydale Gardens:** there is no analysis of this. It is relevant to proposed emergency access, construction access, the risk of expansion of the emergency access in the future, and to the use of Wensleydale Gardens by pupils and parents/carers to reach the Carlisle Park gate. There is a pedestrian gate into Carlisle Park on the western side of the road, but there is no pavement on the western side of the road for some distance before the gate, so many people from park users to those going to Denmead walk in the road rather than crossing to the eastern side then back again.
- **The Planning Officer’s report on the first application** commented on:
 - lack of justification for opening up the access,
 - the detriment to the residents, and
 - the very real risk that over time there will be use of this access for purposes other than emergency access.
- **Risk of use for wider purposes:** the application confirms this risk by including various conflicting statements about what the restriction on use of the access will be, from emergency access (when there is no need to include access for ambulances) to stating that it should not be used for “parent drop-off and pick-up”, leaving it open for use for deliveries, staff and anything else.
- **Construction access:** all the swept path analysis work is on the wrong (narrower) building configuration (see above), so there is no supporting evidence. There is no consideration of the use of vehicles smaller than the 12m rigid and 16.5 articulated lorries.

PART C OBJECTIONS OTHER THAN ON TRAFFIC AND HIGHWAY SAFETY

The objections to this application on grounds other than Traffic and highway safety are set out in:

- Bell-Cornwell’s Planning Statement at Appendix A;
- in addition on the grounds set out in the DNA’s objection to the previous application (Annexes 2 and 3)11/4125, as this application is on these points unchanged from the first application; and
- points arising since the objections to the previous application (listed below).

Residents objections are on the basis that the proposed development is out of keeping with zoning of the site as Other Open Land (OOLTI) 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. It would adversely affect residential amenity and give rise to overlooking. There are also objections on the grounds of noise and disturbance, lighting, trees and landscaping and others. Please see the Bell-Cornwell advice at Appendix A for these objections, and for details of relevant planning policies.

Points arising on these objections since the previous application 11/4125

Zoning as Other Open Land of Townscape Importance - OOLTI

- The reduction in the building's gross internal floor area is less than 2%, so the footprint must be about a 1% reduction, so any change to the impact on the site for OOLTI purposes is trivial. (The only change is the slight reduction in the corner near the Gloucester Road entrance).
- There is no alteration to the intention to change this site from one which is mostly grass to one which is mostly artificial surface, which, although permeable, changes the nature of the site.
- Sedum roof – this is referred to as an option, the other possibility being aluminium. Is the sedum a certainty or a possibility? We can find no explanation of what the deciding factor would be.
- There is no mention of the gardens of adjoining houses except for Gloucester Road, which has much longer gardens. So no consideration is given to the proximity to the houses – Scotts Drive and most of Wensleydale Gardens – who are 6m or less from their boundary with the school

Noise and Disturbance

- The Council will be aware that there is currently an application by the school for a Certificate of Lawful Development 12/3957/s191. This application is to cover many occasions when use by the school has been outside the hours of use set by planning conditions on the use of the Jubilee Hall. These conditions have been in place since the Hall was built in 1985. The purpose of the conditions was to protect the amenity of residents.
- The basis of the school's application for the LDC is that they have been using the Hall for various purposes outside the hours set in these conditions for a long time. However, as we have already pointed out to the Council, the uses for which there is reasonable evidence of regular occurrence are:
 - 8 Saturday events, six of which finish by 12.30 and 2 finish by 15.00 hours
 - Earlier start at 08.15 and later finish by 17.30 daily in term time only
 - There is evidence, but lacking clarity, of 4 evening events a year finishing by 21.00.
- The Council may wish to consider the file on this application, which clearly shows the level of noise and disturbance experienced by residents from out of hours activities.
- Should the Council be minded to grant a consent to this application 13/2102, then residents ask that restrictions on hours of use be put in place limiting the school to use of the site for a

maximum of the events and hours set out above. Use of the site and buildings generally should also be limited to term time only, as in the currently applicable condition for the Jubilee Hall.

- We are advised that non-school use of the site does not have planning permission and should not take place. We mention this particularly because Hampton, who own Denmead, have a well-promoted letting programme on their other school site, and the introduction of all-weather pitches and a new facility at Gloucester Road could be added to the lettings offered. In the residents' view any extended out of hours use of the site would have a severe impact on their amenity, as this is a small site and the because of the close proximity (5 or 6 metres to the boundary) of the Scotts Drive and Wensleydale Gardens houses.

Sport England recommended distances from MUGA pitches.

- The development proposal does not comply with the Sport England recommendations on distance from houses. The minimum distance is 12m, and the recommended distance 30m. One house in Wensleydale Gardens is under 12m, and two more are under the recommended distance at 17.6m and 19.5m. Sound reduction measures are recommended by Sport England when distances are not met, but no measures are included in the development proposal.

Inaccuracies in application documents

- There were no classrooms on this site until the 1970s, so it cannot be correct to state, as the Design and Access Statement does, that teaching began in the 1930s. The only building on the site before the 1970s was the old sports pavilion, later demolished and replaced in the same place by the Jubilee Hall in 1985. Also, according to Land Registry entries the school has had full title to the site since 2008, not 2011 as stated in the Design and Access Statement
- We estimate that less than 30% of the school's pupils live in Hampton, so the School is unlikely to have more than a marginal influence on local need. As the Planning Officer noted on the first application, the school does not have a catchment area. In addition, the new St Mary's Infants/Junior Free school is opening nearby in Oldfield Road (to the west of Hampton station) in September 2013, one form entry, specifically to meet local need.

FURTHER DOCUMENTATION

Annexe 1 (separate document) contains photographic evidence in support of this Statement. Further video material will be supplied on CD-ROM.

Annexe 2 (separate document) Neighbour Survey. The objections on the first application 11/4125 were prepared after an extensive survey carried out by the DNA of all 187 households in the adjoining roads (Gloucester Road, Carlisle Road, Scotts Drive and Wensleydale Gardens) with a good overall response rate of 64%. DNA gathers that opinion has not changed significantly since then. This is supported by the nature of the statements of objection posted to date on the Council website and by our many contacts with residents.

Annexe 3 (separate document) contains the remainder of the previous Statement of Objection. This is still highly relevant given the similarity of the new application.