

Our ref. JCC/CS/6192/CJ/Harroddian/LBRUT 030720

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Chief Planning Officer
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

3rd July 2020

Dear Sir/Madam

**HARRODIAN SCHOOL, BARNES
PLANNING APPLICATION REF. 20/1496/FUL**

We act for Mr and Mrs Tapper who live at 14 Belgrave Road, London SW13 9NS adjacent to the proposed development. We object to the scheme on their behalf for the following reasons.

We are concerned at the opening hours of the facility which will be normal school hours plus 6.30 p.m. to 10.00 p.m. and 2.00 p.m. to 7.00 p.m. on Saturdays. This will have potential to create noise disturbance to their house and garden at unsocial hours. The acoustic report submitted with the application is totally inadequate to assess this noise impact. An acoustic report is needed to assess the impact of noise from the proposed activities and during the hours of use proposed and to identify any mitigating measures necessary to protect the amenity and quiet enjoyment of my clients' house and garden. This is a requirement of Policy LP8 of the Richmond Local Plan.

As the proposal is for a school expansion and is a major scheme, Policy LP44 of the Richmond Local Plan requires a transport assessment. The TA in Section 6 of the Design and Access Statement is wholly inadequate. There is reference to a TA in the DAS but it is not on the Council's website. A complete transport assessment is required in order to assess the transport impact of the proposals. My clients have no way of assessing the transport implications of this proposal without the benefit of such an assessment.

These issues are fundamental to my clients' understanding of the impact of this proposal on their amenity and I ask that the information requested above is provided before any decision is made on the application and my clients are given an adequate opportunity to assess any information submitted.

Yours sincerely



Joe Cunnane
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14 Belgrave Road
London
SW13 9NS
3rd July, 2020

Your ref: 20/1496/ful

Dear Ms Kreena Patel

Via e-mail: planning@richmondandwandsworth.gov.uk

kreena.patel@richmondandwandsworth.gov.uk

**OBJECTION TO THE HARRODIAN SCHOOL Sports and Cultural Centre,
PLANNING APPLICATION REF. 20/1496/FUL**

Process

I understand that the designation of Metropolitan Open Land (MOL) for the Harroddian School was amended sometime during 2018 however none of the local residents were consulted about this matter nor have we been notified. I also note that there is no evidence of this information available in the school's planning history on the council's website and I fail to understand how such a fundamental and important change to the designation of a location with such a history of applications to increase the scope and size of its operations did not involve consultation with the local residents.

Then the application itself was submitted on 4th June 2020 and neighbours were notified on 15th June 2020 and given until 6th July 2020 to register comments. This whole period has been subject to "Lockdown" meaning that neighbours have not been able to meet to discuss and consult the details. So in the knowledge that "Lockdown" is clearly being eased, I would like to understand how the council would look at giving the neighbours more time to consider their responses to what is a significant and complicated application?

I am also that only a very limited number of local residents were formally notified of this planning application, when the impact will be felt by many more, so I also think that additional properties in Suffolk, Lowther, Parke and Lonsdale Roads should be advised of this proposal.

Location of Building

- The plans suggest this will be only 9m from the nearest property and 7.3m from the boundary
- All of the properties at the end of Belgrave and Lowther Road will have their views dominated by the structure both from their homes and their rear gardens
- I currently have clear views of the existing astroturf pitches from the windows of my ground floor living room, both first floor bedrooms, 2nd floor bedroom and 2nd floor study. Additionally the building will run the full length of the property and the garden, consequently the structure will dominate our views to the rear of our property where we spend 100% of our time when at home. – I have provided photos as evidence of this
- The Mayor's London Plan Policy 5 ("LP%") relates to views and vistas. As such the current plans will permanently obstruct the views out of the rear of our property and from the garden. Other residents of Belgrave Road and Lowther Road currently benefit from upper floor views across the site of the proposed sports hall. The proposed building will permanently obstruct this local vista, view and gap across to the River Thames, contrary to policy LP 5.
- There is no reason for this other than the school's owner's ("the owner") desire to not have their existing buildings disturbed by the users of the new building with no similar consideration given to their neighbours. The building could clearly be

located substantially closer to the existing buildings to the north, so reducing the impact on neighbouring properties.

- The council clearly stated that the owner's previous application for a sports hall would impact on the amenity of the residents in a four storey block of flats that was 20m from the proposed building – clearly our house will be significantly more impacted by this building that will be at least twice as close
- The proposed changing rooms will be within the MOL See MOL report 3.3. There is no justification for this seeing as the school has been given an extensive new designation of non-MOL land in 2018. Why is it therefore necessary to encroach on MOL designated land when the council has only recently amended the MOL to give them more space to develop.
- None of the 11 state senior schools in the Richmond Borough, nor the private ones, locate buildings of this size alongside boundaries with residents. They all cluster their buildings away from such boundaries. The St. Paul's School's single storey sports hall that is given as an example, is not sited along a boundary fence and nor is it in sight of any local residents because it is only single storey.

Size of Building

- It will be the largest building on the school site with height of 11.8m (the top of the dome) being the highest point for some distance. The council has received numerous applications from the school over the years to increase the footprint and has consistently looked to minimize any increases, so how can it seriously consider a proposal that will consume at least 1,800 sqm and be 11.*m tall.
- The dimensions are 60m x 30m x 11.8m (inclusive of cladded roof) making it one of the largest structures in Barnes but located in a residential area
- The floor of the building will be set 3m into the ground, 28m wide and 60m long, so creating a basement approximately 60 times the size of a normal house basement
- The flood assessment plan of 46 pages has only one paragraph devoted to underground water flow and makes no reference to other basements in the area (of which there are many) and so doesn't assess the potential impact on neighbouring properties or the trees in any detail and so completely fails to address the potential impact of their combined affect.
- The overbearing size of the building was included as one of the reasons for the previous rejection of the school's application for a sports hall back in August 2013 when it was proposed to be located within 20m of a block of flats however this proposal is no smaller and is twice as close to smaller properties
- The school itself notes in its submission that the building only needs to be 34.5m x 20m x 7.5m to accommodate the sports activities (see Design & Access Statement 3.3) but that it is of a larger size to accommodate further classrooms, offices, seating etc.
- I believe that a smaller building, solely for the purpose of sport could be located much closer to the existing properties and consequently create much less disturbance, and be less overbearing to its neighbours

Purpose of Building

- The owner states the need for a sports hall however this is far more than that.
- It has seating for 400, when by way of comparison Barnes cinema has combined seating for 200, and the school already has its own theatre and assembly hall – this is clearly unnecessary in the context of sport and the other cultural activities which are already catered for by existing facilities
- There are classrooms and offices included within the plans, all of which have nothing to do with a sports hall.
- Sport for England sets out the required dimensions for a 4 court sports hall as being 34.5m x 20m x 7.5m – significantly smaller than the proposed plans

- I think it is clear to everyone that this application is about more than providing the school with a sports hall.
- These extra, unrelated facilities were given as reasons for the previous planning rejection back in August 2013.

Usage of Building

- The opening hours of the facility will be school hours plus it will then be open to the public from 6.30 p.m. to 10.00 p.m. and for school matches on Saturday mornings plus from 2.00 p.m. to 7.00 p.m again for use by the public. I assume it will not be open on Sundays.
- If we assume this means before school practice as well, that means the facility will therefore be open 14.5 hours a day on weekdays plus 10 hours on a Saturday which will create noise disturbance to the neighbouring area for up to 75 hours a week as 100s of people will access it on a daily basis– this is a residential, not a commercial area
- As the building has seating for 400, we have to assume that regular school shows, music, drama etc, will also be held in the evenings.
- The owner’s representative at the Consultation meeting I attended specifically stated that it will hold its regular late night parties for 100s of guests that play loud music past midnight in the facility. Currently they have to hire a large marquee to host these events. They usually have more than 200 guests at these events to celebrate anniversaries, Leavers Balls, Parent Teacher Fundraising and even a wedding reception. The school is very much a profit making company, unlike state schools and other charitable trust private schools. In 2018 it generate a profit before tax of £7,206,514 after revenue of £19,298,667 and paid a dividend to the owner of £6,638,500, following one of £7,970,000 the previous year (registered number 02783152). As such we have to expect that the owner will look to generate as much additional revenue as he can once this new facility is completed and therefore the assumption has to be that this type of event will increase in number.
- The expanded sports and cultural activities proposed and the hours of operation associated with them require a proper noise impact assessment which includes a review of all possible events to be hosted. The assessment in the Design and Access statement is completely inadequate. Only by preparing a noise impact assessment can those hours of operation be properly assessed by local residents. The applicants should be requested to remedy this deficiency.
- There is no provision for parking for visitors as access to the public will be via “the rear route” which we believe to be Lowther Road for “security reasons” where there is no access to parking on the site – this is a clear failure in relation to Richmond Council’s stated planning policies for new developments.
- Lowther Road is unsuitable for a public access road with no turning space or drop off space for cars. The current plans make no mention of these parking issues. All school expansions should have a Transport Assessment. This requirement also applies to all major planning applications of which this is one. The Transport Assessment in Section 6 of the Design and Access statement is wholly inadequate. There is reference to a TA in section 11 of the DAS but it is not on the Council’s website.
- At the present time, with seemingly no access to the existing car park available during private hire events, the proposal is contrary to policy LP 45. The anticipated amenity impacts associated with the wider use of the new building, its scale, siting and use of the access in Lowther Road mean that the proposal is also contrary to policy LP 8, specifically parts 2, 3 and 4.
- In summary, the location and proposed opening hours will create extensive, prolonged noise disturbance to the immediate and surrounding neighbourhood.

Relocation of the Astro-turf Pitches

- The existing pitches that are currently located on the site of the proposed development are to be relocated to the North of the site in a space that is clearly MOL
- Having only recently had a significant part of their site re-designated as non MOL, this would appear to be a totally unnecessary request and they should strive to contain all of their developments within the newly designated non-MOL location
- I note that the council has consistently, and correctly denied all proposals put forward by the school to locate any facilities on the site to the north of their buildings since the existing astro-turf pitches were located there and I believe all of the reasons used to resist these plans are relevant for this proposal too.

Trees

- The tree survey report does not take any account of the disturbance to the water table that will be created by the significant underground development required due to the current proposed plans
- It does acknowledge in para 5.4 that the plane trees will be affected but only considers potential root damage caused by the foundations and not any water displacement impacts.
- It is common knowledge that trees next to domestic basements often have to be removed because they cannot be sustained when the waterflow changes. Therefore these trees are at considerable risk given the extent of the basement and their size
- There is reference to an existing tree root barrier which has apparently been inserted a few years ago to stop the roots growing under the current astro-turf pitches and that this will be retained or improved to further protect the trees. This is of considerable concern to me. The Plane trees are actually located along the existing boundary and the trunks of two are within 3m of my property, so any barrier that prevents the roots growing towards the existing pitches, will force those roots to grow under my property, so potentially damaging our foundations. We have received no prior notification of this barrier and have at no time have we been consulted about this and I would like the council to insist that a more appropriate survey is undertaken to establish the real impact of this issue.

Construction Access

- The owner proposes accessing the construction by entering via an existing, residential, narrow cul-de-sac, Belgrave Road which has no provision for traffic to turn
- There is no vehicular nor pedestrian access in place at the current time. The boundary is fenced and predominantly screened by vegetation and sporadic trees when viewed from Belgrave Road. These will need to be removed to form a new vehicular access. This road is a two-way street, but with parking bays either side, there are limited passing places. It's residential nature also does not lend itself to being an ideal route for construction traffic. It is unreasonable to expect the residential occupiers of properties along this cul-de-sac to have to endure construction traffic together with the noise, mud, debris and dust associated with it (with particular reference to 9am to 3pm Saturdays as proposed in the CMS). The amenities of these residents will be severely affected during the construction phase if this CMS is considered acceptable by the Council.
- The reason given for this proposal is that the owner (the school), who is the only beneficiary of the new building, wishes to minimise the disruption to the on-going operations of the school with no similar concerns for its neighbours. As I have said before, the business generates a sizeable profit every year and therefore it can easily afford to provide for whatever safety measures need to be added to the school to make the development safe for the students and staff. This is how all other schools would manage this matter however the owner clearly feels that it is more appropriate to pass that considerable burden and related safety concerns on to his neighbours rather than manage it himself

- The route for vehicles means negotiating the junction with Suffolk and Lonsdale Road which is often congested by a combination of the 419 bus, normal car users and parked cars. Adding large heavy vehicles to the existing flow will make the junction dangerous to all users including pedestrians.
- there is also a childrens' playground in the section of Suffolk Road that will be used and adding large construction vehicles to the existing traffic flow has to be a matter of road safety concern. (photos are provided to illustrate all of these points).
- The proposal also means that the site entrance will be at the end of the driveway to my property. This means all of the construction traffic will need to pass through what is now a fence that is protected by mature shrubs and require the reduction, if not removal of existing trees as well. We are told to expect the construction to last for at least two years. There is a clear an obvious better alternative which is the school's main entrance on Lonsdale Road.

Alternative Option

- I fully realise that a school requires some provision for indoor sport however I do find it strange that the school itself did not start applying for such a facility until it had been operating for at least 15 years despite making numerous other planning applications to increase the size and scope of the school both before and after. This is surely and indication of how high on the list of priorities this sits with the owner.
- Having said that building that meets the dimensions recommended by Sport for England which is one of 34.5m x 20m x 7.5m, would be much more appropriate given the nature of the property and the neighbourhood in which the school is located.
- I believe that a building of this size could also be accommodated without moving the existing astro-turf pitches, so removing the need to relocate them on to MOL. The school currently has a huge marquee located between these pitches and its existing buildings which it is quite happy to have on site every year from May through the summer months, so I would imagine that locating an appropriately sized facility in this location would function equally well.

Conclusion

I object the current submitted plans on the basis of:

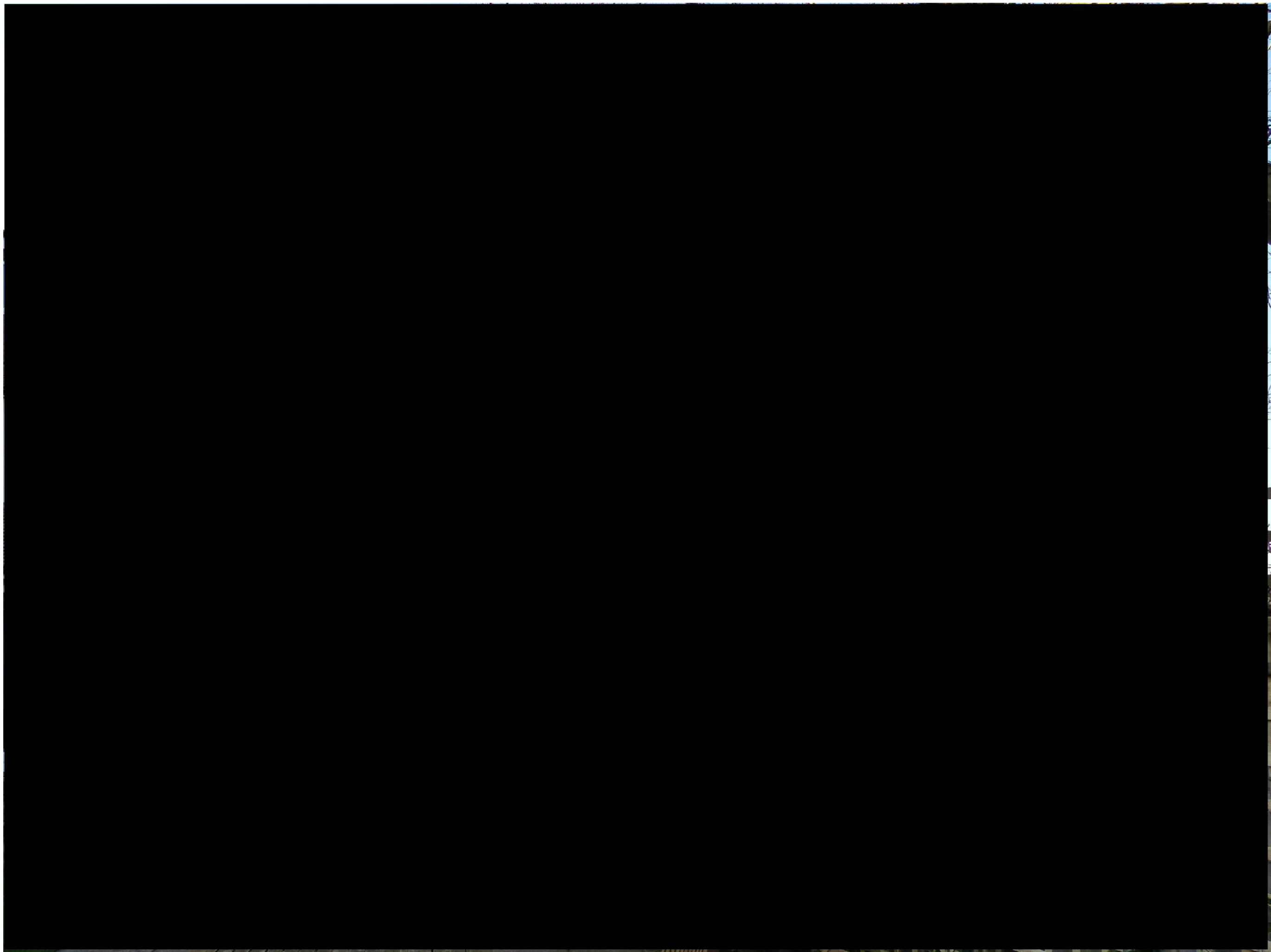
- Its location which will make it overbearing on my property, detract from the amenity of my property and will obstruct all the views to the rear from all of our existing living rooms, bedrooms and garden. Likewise for many other residents of Belgrave and Lowther Road. This contravenes LP 2 and 5.
- Both the proposed changing rooms and relocated sports pitches will sit on MOL which is a clear contravention of that important policy
- The size of the building is excessive and includes facilities that the school already possess and are therefore unnecessary for this development. It contravenes LP7 & 8
- The proposed opening hours and public access routes will create extensive, prolonged noise disturbance to the immediate and surrounding neighbourhood.
- There is no provision for car parking for the potential hundreds of daily public visitors who are expected to access the site via Lowther Road and the neighbouring streets – a clear contravention of LP 45 and the council's own policies for new developments
- The type of proposed cultural activities with the provision for seating of 400 will also create excess noise for which no adequate study has been provided
- The tree survey is inadequate for assessing the impact of change in the waterflow created by significant underground construction required and the potential damage to my own property caused by the roots of the Plane trees along the boundary as a result of the owner's unilateral decision to insert an underground root barrier a few years ago
- The proposed access route which I consider to be of serious road safety concern for existing road users, pedestrians and users of the children's playground located along its route, due to proposed significant increase in traffic flow due to large construction

vehicles that will need to pass along small residential streets for a period of at least 2 years. It is also inappropriate to have to physically create an actual entrance via an existing concrete fence when there is a clear and obvious better alternative which is the school's main entrance on Lonsdale Road.

Yours sincerely,

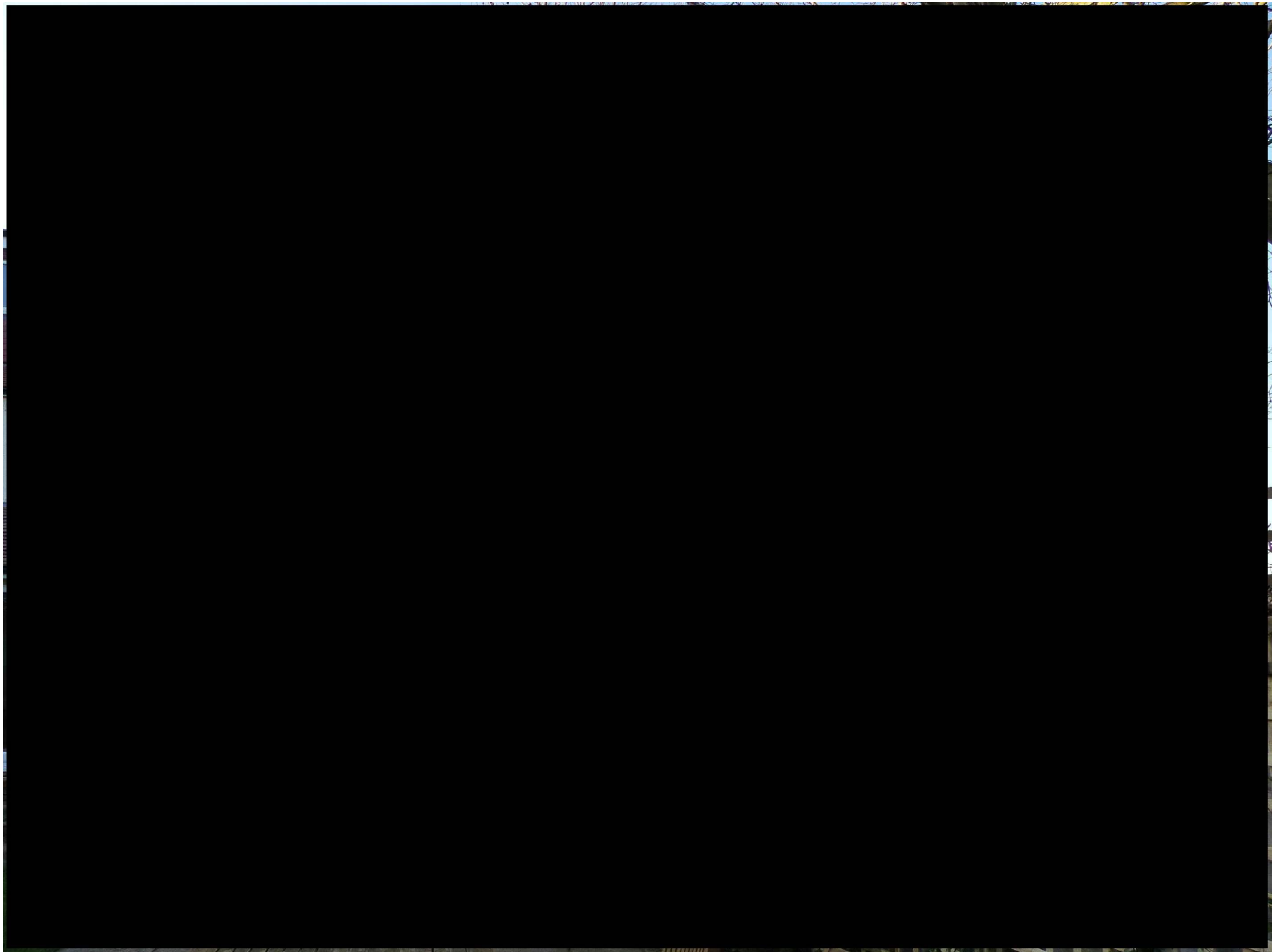


Attached:
Photos of Belgrave Road, Lowther Road, Suffolk Road and existing views from my property.



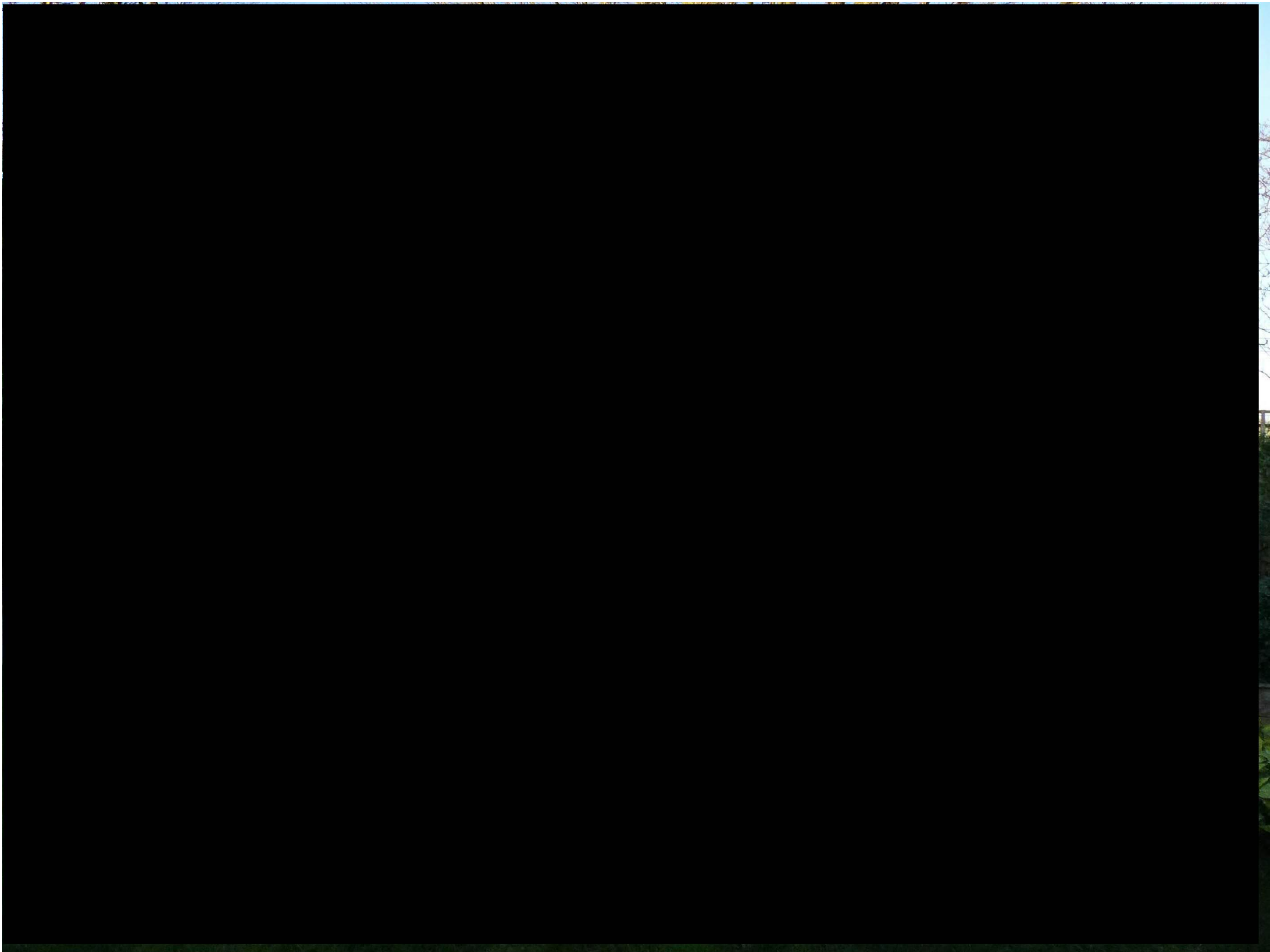


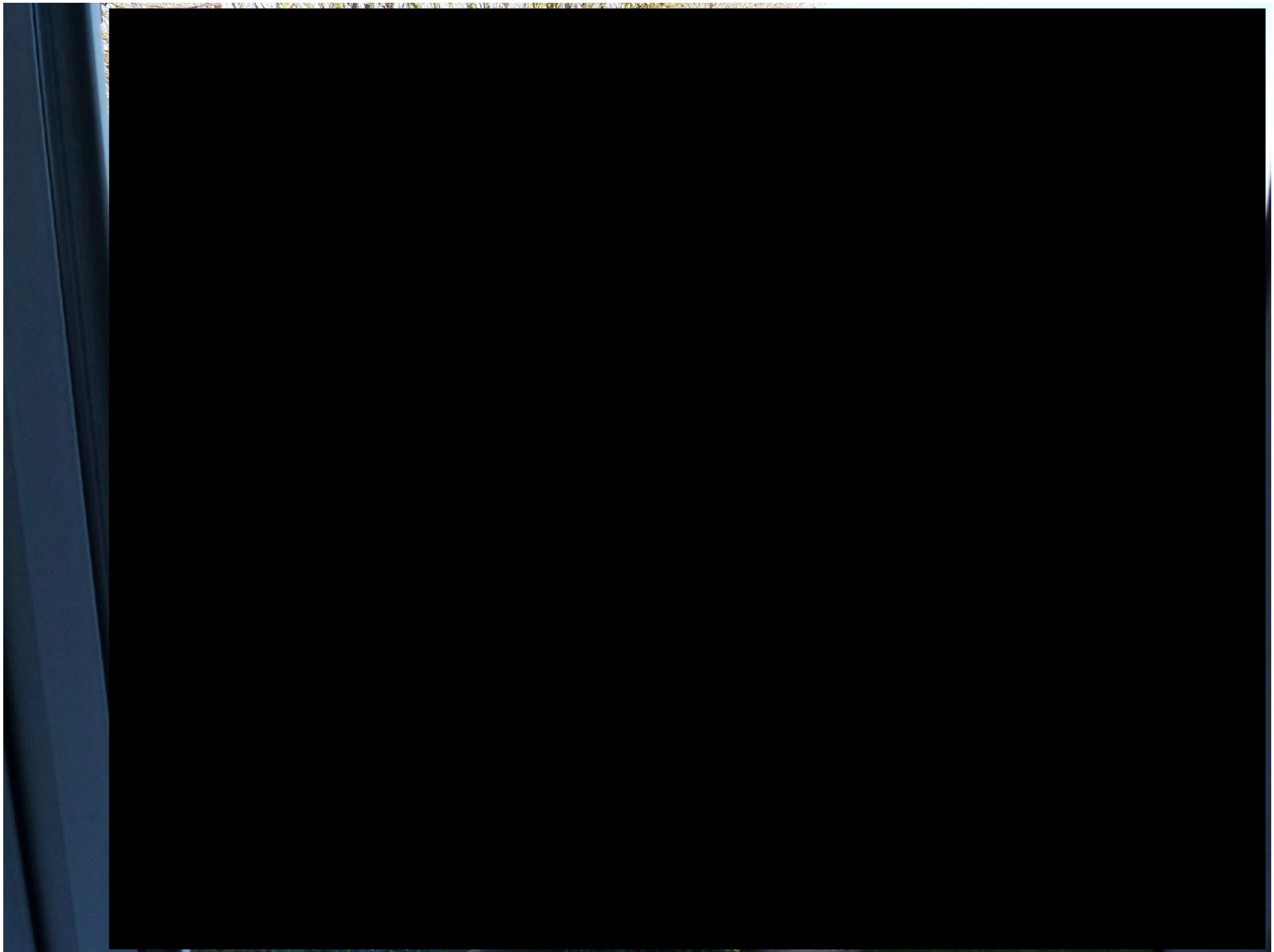












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As the proposal is for a school expansion and is a major scheme, Policy LP44 of the Richmond Local Plan requires a transport assessment. The TA in Section 6 of the Design and Access Statement is wholly inadequate. There is reference to a TA in the DAS but it is not on the Council's website. A complete transport assessment is required in order to assess the transport impact of the proposals. My clients have no way of assessing the transport implications of this proposal without the benefit of such an assessment.

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Process

I understand that the designation of Metropolitan Open Land (MOL) for the Harroddian School was amended sometime during 2018 however none of the local residents were consulted about this matter nor have we been notified. I also note that there is no evidence of this information available in the school's planning history on the council's website and I fail to understand how such a fundamental and important change to the designation of a location with such a history of applications to increase the scope and size of its operations did not involve consultation with the local residents.

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Location of Building

- The plans suggest this will be only 9m from the nearest property and 7.3m from the boundary
- All of the properties at the end of Belgrave and Lowther Road will have their views dominated by the structure both from their homes and their rear gardens
- I currently have clear views of the existing astroturf pitches from the windows of my ground floor living room, both first floor bedrooms, 2nd floor bedroom and 2nd floor study. Additionally the building will run the full length of the property and the garden, consequently the structure will dominate our views to the rear of our property where we spend 100% of our time when at home. – I have provided photos as evidence of this
- The Mayor's London Plan Policy 5 ("LP%") relates to views and vistas. As such the current plans will permanently obstruct the views out of the rear of our property and from the garden. Other residents of Belgrave Road and Lowther Road currently benefit from upper floor views across the site of the proposed sports hall. The proposed building will permanently obstruct this local vista, view and gap across to the River Thames, contrary to policy LP 5.
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located substantially closer to the existing buildings to the north, so reducing the impact on neighbouring properties.

- The council clearly stated that the owner's previous application for a sports hall would impact on the amenity of the residents in a four storey block of flats that was 20m from the proposed building – clearly our house will be significantly more impacted by this building that will be at least twice as close
- The proposed changing rooms will be within the MOL See MOL report 3.3. There is no justification for this seeing as the school has been given an extensive new designation of non-MOL land in 2018. Why is it therefore necessary to encroach on MOL designated land when the council has only recently amended the MOL to give them more space to develop.
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- In summary, the location and proposed opening hours will create extensive, prolonged noise disturbance to the immediate and surrounding neighbourhood.

Relocation of the Astro-turf Pitches

- The existing pitches that are currently located on the site of the proposed development are to be relocated to the North of the site in a space that is clearly MOL
- Having only recently had a significant part of their site re-designated as non MOL, this would appear to be a totally unnecessary request and they should strive to contain all of their developments within the newly designated non-MOL location
- I note that the council has consistently, and correctly denied all proposals put forward by the school to locate any facilities on the site to the north of their buildings since the existing astro-turf pitches were located there and I believe all of the reasons used to resist these plans are relevant for this proposal too.

Trees

- The tree survey report does not take any account of the disturbance to the water table that will be created by the significant underground development required due to the current proposed plans
- It does acknowledge in para 5.4 that the plane trees will be affected but only considers potential root damage caused by the foundations and not any water displacement impacts.
- It is common knowledge that trees next to domestic basements often have to be removed because they cannot be sustained when the waterflow changes. Therefore these trees are at considerable risk given the extent of the basement and their size
- There is reference to an existing tree root barrier which has apparently been inserted a few years ago to stop the roots growing under the current astro-turf pitches and that this will be retained or improved to further protect the trees. This is of considerable concern to me. The Plane trees are actually located along the existing boundary and the trunks of two are within 3m of my property, so any barrier that prevents the roots growing towards the existing pitches, will force those roots to grow under my property, so potentially damaging our foundations. We have received no prior notification of this barrier and have at no time have we been consulted about this and I would like the council to insist that a more appropriate survey is undertaken to establish the real impact of this issue.

Construction Access

- The owner proposes accessing the construction by entering via an existing, residential, narrow cul-de-sac, Belgrave Road which has no provision for traffic to turn
- There is no vehicular nor pedestrian access in place at the current time. The boundary is fenced and predominantly screened by vegetation and sporadic trees when viewed from Belgrave Road. These will need to be removed to form a new vehicular access. This road is a two-way street, but with parking bays either side, there are limited passing places. It's residential nature also does not lend itself to being an ideal route for construction traffic. It is unreasonable to expect the residential occupiers of properties along this cul-de-sac to have to endure construction traffic together with the noise, mud, debris and dust associated with it (with particular reference to 9am to 3pm Saturdays as proposed in the CMS). The amenities of these residents will be severely affected during the construction phase if this CMS is considered acceptable by the Council.
- The reason given for this proposal is that the owner (the school), who is the only beneficiary of the new building, wishes to minimise the disruption to the on-going operations of the school with no similar concerns for its neighbours. As I have said before, the business generates a sizeable profit every year and therefore it can easily afford to provide for whatever safety measures need to be added to the school to make the development safe for the students and staff. This is how all other schools would manage this matter however the owner clearly feels that it is more appropriate to pass that considerable burden and related safety concerns on to his neighbours rather than manage it himself

- The route for vehicles means negotiating the junction with Suffolk and Lonsdale Road which is often congested by a combination of the 419 bus, normal car users and parked cars. Adding large heavy vehicles to the existing flow will make the junction dangerous to all users including pedestrians.
- there is also a childrens' playground in the section of Suffolk Road that will be used and adding large construction vehicles to the existing traffic flow has to be a matter of road safety concern. (photos are provided to illustrate all of these points).
- The proposal also means that the site entrance will be at the end of the driveway to my property. This means all of the construction traffic will need to pass through what is now a fence that is protected by mature shrubs and require the reduction, if not removal of existing trees as well. We are told to expect the construction to last for at least two years. There is a clear an obvious better alternative which is the school's main entrance on Lonsdale Road.

Alternative Option

- I fully realise that a school requires some provision for indoor sport however I do find it strange that the school itself did not start applying for such a facility until it had been operating for at least 15 years despite making numerous other planning applications to increase the size and scope of the school both before and after. This is surely and indication of how high on the list of priorities this sits with the owner.
- Having said that building that meets the dimensions recommended by Sport for England which is one of 34.5m x 20m x 7.5m, would be much more appropriate given the nature of the property and the neighbourhood in which the school is located.
- I believe that a building of this size could also be accommodated without moving the existing astro-turf pitches, so removing the need to relocate them on to MOL. The school currently has a huge marquee located between these pitches and its existing buildings which it is quite happy to have on site every year from May through the summer months, so I would imagine that locating an appropriately sized facility in this location would function equally well.

Conclusion

I object the current submitted plans on the basis of:

- Its location which will make it overbearing on my property, detract from the amenity of my property and will obstruct all the views to the rear from all of our existing living rooms, bedrooms and garden. Likewise for many other residents of Belgrave and Lowther Road. This contravenes LP 2 and 5.
- Both the proposed changing rooms and relocated sports pitches will sit on MOL which is a clear contravention of that important policy
- The size of the building is excessive and includes facilities that the school already possess and are therefore unnecessary for this development. It contravenes LP7 & 8
- The proposed opening hours and public access routes will create extensive, prolonged noise disturbance to the immediate and surrounding neighbourhood.
- There is no provision for car parking for the potential hundreds of daily public visitors who are expected to access the site via Lowther Road and the neighbouring streets – a clear contravention of LP 45 and the council's own policies for new developments
- The type of proposed cultural activities with the provision for seating of 400 will also create excess noise for which no adequate study has been provided
- The tree survey is inadequate for assessing the impact of change in the waterflow created by significant underground construction required and the potential damage to my own property caused by the roots of the Plane trees along the boundary as a result of the owner's unilateral decision to insert an underground root barrier a few years ago
- The proposed access route which I consider to be of serious road safety concern for existing road users, pedestrians and users of the children's playground located along its route, due to proposed significant increase in traffic flow due to large construction

vehicles that will need to pass along small residential streets for a period of at least 2 years. It is also inappropriate to have to physically create an actual entrance via an existing concrete fence when there is a clear and obvious better alternative which is the school's main entrance on Lonsdale Road.

Yours sincerely,



Attached:
Photos of Belgrave Road, Lowther Road, Suffolk Road and existing views from my property.

