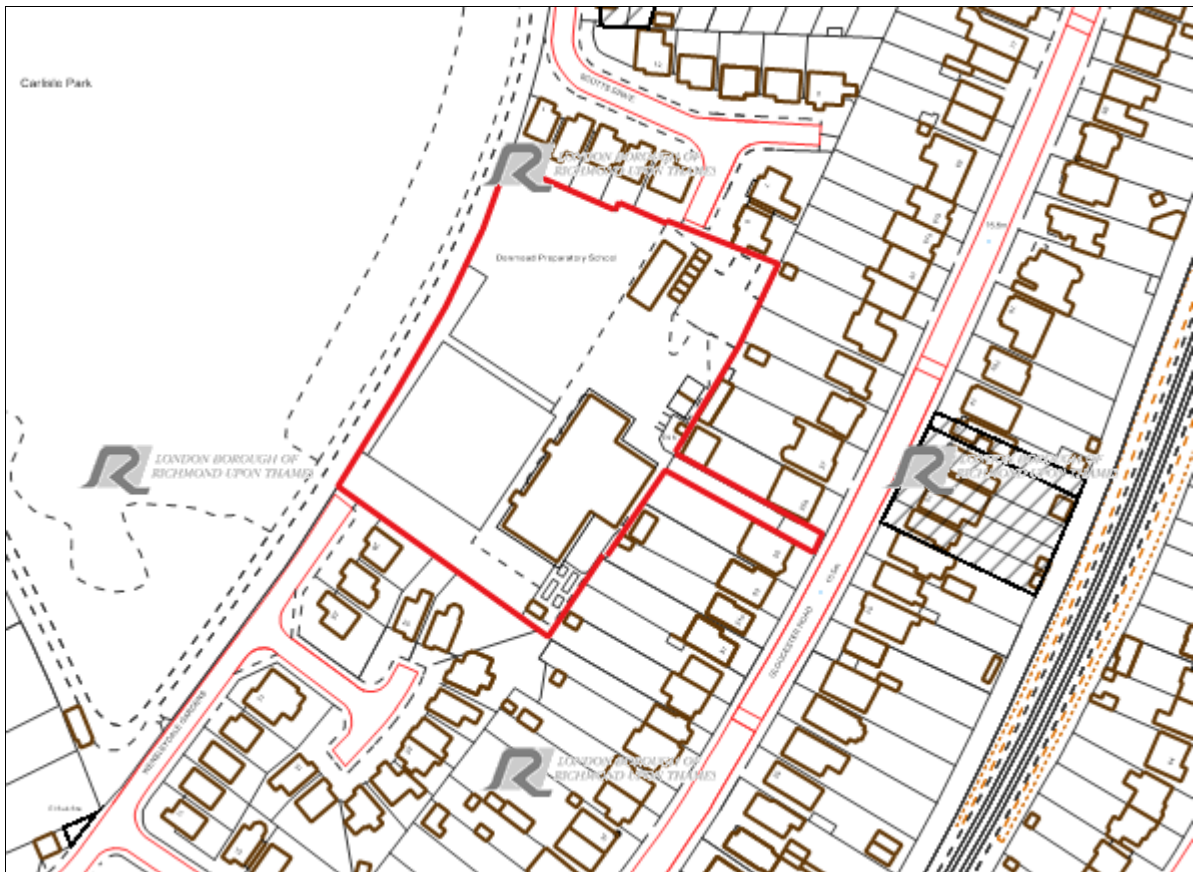


APPLICATION	13/2102/DD20
ADDRESS	Hampton Pre-Prep and Prep School, Gloucester Road, Hampton, TW12 2UQ
PROPOSAL	Details pursuant to condition U67179 - Hampton Pre-Prep and Prep School Travel Plan 2019-2020
CONTACT OFFICER	Fiona Dyson
APPLICATION RECEIVED	19.02.2021
WARD	Hampton

[Planning detail - London Borough of Richmond upon Thames](#)



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1. SUMMARY

- 1.1 The application relates to compliance with a condition requiring the submission and approval of a school travel plan following redevelopment of the Hampton Prep School site on Gloucester Road, Hampton. The development did not involve an increase in pupil numbers. The submitted travel plan is considered to be acceptable in terms of the information provided relating to the current situation and proposed targets are noted.
- 1.2 There are a number of objections from neighbouring occupiers regarding parking issues on the surrounding streets and the lack of marshalling. The applicant has submitted evidence as to why they are unable to comply with the previous informative, and parking surveys indicate that there is sufficient capacity on the surrounding roads.

The Transport Officer and Travel Plan Officer are satisfied with the information provided and confirm that the Travel Plan meets the requirement of the condition.

- 1.3 The school is encouraged to continue the 'School and Denmead Neighbours Association Liaison Group' and meet on a regular basis as previously requested at the last Committee meeting. Whilst it is understood that Covid may have prevented these meetings from taking place in person, they are considered important to address and discuss matters of parking and the school travel plan, that may arise from the use of the site.

It is recommended that the Planning Committee GRANTS the discharge of condition with the informatives listed in Section 10 of this report.

2. REASON FOR PLANNING COMMITTEE DETERMINATION

- 2.1 The Council's Constitution does not give the Assistant Director of Environment & Community Services (Planning & Transport Strategy) delegated powers to determine the application in the way recommended; such decisions can only be made by the Planning Committee.

3. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

- 3.1 This application relates to the re-developed former Denmead Preparatory School.
- 3.2 The school site is bound on three sides by the gardens of residential properties in Gloucester Road, Wensleydale Gardens and Scotts Drive. The rear (north-western boundary) of the site abuts Carlisle Park, an area identified as Public Open Space and Other Open Land of Townscape Importance (OOLTI). There is a perimeter gate which allows access to the park where games pitches are occasionally hired. The main access to the school is via a narrow roadway sited between nos. 55 and 55a Gloucester Road.
- 3.3 Planning permission 13/2102/FUL granted planning permission (Committee decision) for the re-development of the school site comprising the demolition of 3no. existing single storey teaching blocks, stores, the existing hall and construction of a new two storey building with associated external works and landscaping. This was subject to various conditions and informatives. Of the conditions imposed two are on-going. One is the restriction on pupil numbers to 144 where the school submit details of the number of children on school roll, on an annual basis. The other is the submission of the travel plan to which this application relates.
- 3.4 Building work was completed at the school in 2017. Application 13/2102/DD10 relating to the travel plan methodology was discharged in June 2017. The most recent submission (ref: 13/2102/DD18) related to the 2018-2019 Travel Plan. The Planning Committee held on 3rd June 2020 stated the following regarding marshalling: *The members noted that the school had explained that their insurance provider had stated that they would not cover this activity. Members agreed that they were not satisfied that the school had investigated whether alternative insurance providers would cover marshalling of the surrounding roads.*

4. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

- 4.1 This submission seeks to discharge the element of condition W67179, which required the submission of a travel plan. This condition reads:-

Staff, visitor and pupil travel surveys shall be undertaken in accordance with a survey methodology to be submitted to and agreed by the Local Planning Authority prior to it being carried out. Within 3 months of the use commencing, a new travel plan based on the results of the survey shall be submitted with clear objectives, targets and actions for achieving a shift to more sustainable transport modes. Following approval by the Local Planning Authority, the applicant shall then implement these actions to secure the objectives and targets. The travel plan (including surveys) must be annually revised, and an updated travel plan submitted and approved by Council by the anniversary of its first approval and yearly thereafter until the 5th year after which it will become voluntary.

REASON: In order to comply with the objectives of national and local Planning Policies which promote sustainable development with particular regard to transport.

- 4.2 This is the 4th travel plan for the school relating to the period 2018-2019. One further submission for the period: 2020/21 is required and is the subject of application ref: 13/2102/DD22.
- 4.3 Hampton School was awarded its Gold- level Accreditation in August 2017, having held this accreditation since 2014. “Gold Accreditation” is the highest level of accreditation awarded to a school based on its success in reducing use of the car, increasing sustainable travel and the number of Travel Plan activities implemented.
- 4.4 The submitted travel plan also refers to Hampton Pre Prep school which is located in Wensleydale Road, a little under 500m away by vehicle or 250m on foot via Wensleydale Gardens and Carlisle Park. The condition only relates to the Gloucester Road site.
- 4.5 The key objectives outlined in the consented Travel Plan 2016-17 are as follows:
 - To enable parents/carers and children to walk to the school;
 - To enable parents/carers and children to cycle or scoot to the school;
 - To promote health and fitness through these active modes;
 - To promote the use of public transport to the school;
 - To improve the environment outside of the school for the residents and local community;
 - To reduce congestion at the school gate;
 - To equip children with better road awareness;
 - To promote car-sharing;
 - To maintain good and productive communication with its neighbour
- 4.6 Key mode share targets set in the previous Travel Plan is included in the table below.

Table 2.1 Travel Plan - Targets	Travel mode to and from School %					
	Active Travel		Public Transport	Park & Stride	Car Sharing	Car (inc Motor cycle)
	Walking/Scooting	Cycling				
2016 - 17	17%	1%	8%	20%	11%	43%
2017 - 18 Target	20%	4%	5%	20%	12%	39%
2018 - 19 Target	20%	7%	7%	18%	8%	39%
2019-20 Target	16%	5%	8%	26%	9%	32%

Relevant History:

- 4.7 The most recent, relevant history is as below. Full planning history can be viewed on the Council’s website:

13/2102/DD21 - Details pursuant to condition U67172 - Restriction on Pupil Numbers of Planning Permission 13/2102/FUL. – Granted 08.10.2021

13/2102/DD18 - Details pursuant to condition U67179 - Travel Plan (IN PART) of Planning Permission 13/2102/FUL. Hampton Pre-Prep and Prep School Travel Plan (2018-2019), prepared by Hampton Prep School - Granted 09.06.2020

13/2102/FUL - Redevelopment of school site comprising demolition of 3no. existing single storey teaching blocks, stores, the existing hall and construction of new two storey building with associated external works and landscaping. – Granted Permission 09.01.2014

5. DEVELOPMENT PLAN

5.1 The main Development Plan policies applying to the site are:

Richmond Local Plan (2018)

Issue	Local Plan Policy
Impact on Amenity and Living Conditions	LP8
Sustainable Travel Choices	LP44

These policies can be found at https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf

London Plan (2021)

Issue	London Plan Policy
Transport	T1, T4, T5, T6

These policies can be found at https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

6. MATERIAL PLANNING CONSIDERATIONS

National Planning Policy Framework (NPPF) (2021) sections

Section 4: Decision-making
 Section 9: Promoting Sustainable Transport

These policies can be found at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

7. CONSULTATIONS CARRIED OUT

Comments from interested parties

7.1 **Hampton Prep Neighbour’s Association** have raised the following concerns:

In 2013 the Council imposed Conditions and Informatives designed to limit adverse effects of School operations and improve neighbour-School relations.

- Neighbours opposed successive Travel Plans (TPs) on grounds of concern that the Plans were not representing the true situation, and that the objective of encouraging good relations with neighbours was unachieved. The 18/19 Plan was discussed in Committee. Councillors and Officials raised concerns about repeated lack of observance of Informatives. It was made clear that if this continued, further action could be taken to reinforce the Council's wishes and that the decision on THIS Application would go to a Planning Meeting.
- The School has admitted to ignoring Informatives, and broken the TP objective on neighbourliness. Also, survey results from a COVID-struck year do not form satisfactory evidence for making decisions on the traffic situation. This Application should be refused, stronger measures taken to ensure compliance, and the required period for the submission of Travel Plans extended.
- The School cites its gold accreditation (using the 2017 situation) for sustainable travel, based on car use reduction. However, staff plus pupils' use has fluctuated but not shown a clear reduction. 2017-2020 no.'s are: 112,102, 112 and 105. Staff car use over the same period has gone up significantly: 19,21,28,30. The School continues to use percentages to draw conclusions rather than absolute numbers. Real numbers cause traffic and parking issues, not percentages.
- The School seeks to use only the Prep figures in this TP submission. This does not make sense and is a departure from using total numbers as presented in previous TPs. A switch to Prep only would invalidate TFL accreditation.
- The School says it has no intention of complying with the Council's Informatives because they are legally unenforceable. It says they are irrelevant, unnecessary and unreasonable despite them being considered as such by Councillors and Officials; neighbourly behaviour?
- The Headmaster announced the decision to curtail marshalling at a Liaison Meeting on 28/11/18. Neighbour behaviour was not mentioned as a cause. The School agreed to investigate extending their Insurance, or subcontracting work. The allegations of hostility remain unsubstantiated. The ref. to Cllr Roberts' statements about policing in the Borough is inappropriate. Only illegal parking can be combatted by police & officials. Marshalling would help the School to fulfil its obligations to its neighbours to control inconsiderate driving and parking.
- 2020/21 has been a unique time. The School should make health & safety of its pupils, staff, parents and its neighbours a priority, rather than its operations. Neighbours would support reasonable measures during a pandemic to ensure safe travel to and from school. They have failed to discourage parking in streets deemed by the Council as unsuitable for school parking. More parking stress is likely to bring more incidents. This week a parent drove over a Wensleydale Gardens neighbour's lawn and hit their property. Fortunately, there were no serious injuries, but it could have been worse.
- The School judges a single webinar as successful, despite attendance by an unrepresentative sample of 8 neighbours. They say this would be a good way to liaise in future, but participants were not specifically asked if it would be a satisfactory substitute for HPNA Liaison meetings nor was the wider neighbourhood consulted. This is a poorly organised method, unsatisfactory to neighbours. We need an effective regular meeting as mentioned in the Informative, with an independent Chair and open, via online tools, to the neighbourhood. Nine months on, there has still been no neighbour communication about this, and no progress made by the School.

7.2 A total of 17 letters of objection have been received from **14 households**, summarised as follows:

- Lack of marshalling/ whatever action the school is taking to dissuade parents from using Wensleydale Gardens is not yielding results.
- Recent accident.
- In 2013, the council placed an Informative on the school to hold regular liaison meetings with neighbours. These are now webinar ones.
- Covid has affected all aspects of life in the past 12 months, including travel and traffic. Statistics from any traffic survey in the past year will not represent a true picture of traffic and should not be considered.
- The school invites the Council to provide parking enforcement during the periods when pupils are deposited and collected. I hope that the Council will respond positively to this creative initiative from the school.
- Refusal to communicate with local residents
- All School Traffic Surveys contain incorrect data - at best poorly conducted and at worst deliberately misleading
- Many parents are sitting in cars with engines idling resulting in a huge amount of pollution.
- Ultimately the goal of the school would appear to be of growth of pupil numbers.
- The school currently uses Carlisle Park for sports and in wet weather destroy the surface of large areas of the park.
- Travel Plan figures, for what they are worth, show maximum stress is in Wensleydale Gardens.
- Vehicles idling/ air pollution increase
- Total vehicle journeys fluctuate and do not show a convincing trend of reduction.
- There are no measurements which show the differences in traffic and parking between in and out of term time. Neighbours are well aware that the situation degrades during term time.
- Due to Covid, the Committee should extend the period for which Travel Plans are required and take stronger measures to limit the adverse effects of School operations
- Demolishing single storey buildings and replacing them with two storey buildings will mean an increase in student capacity
- The School have failed to include in the Travel Plan/Parking Stress surveys accurate recognition of the use of local roads for parking by parents/staff of the Pre-Prep School. The survey numbers seem to relate solely to the Prep School.
- No mention is made of staff parking, which would, be taking place before and after the pupil pick up times but could well be a factor in all-day parking levels. Prep and Pre-Prep staff numbers have increased by 23 to 53 (compared to 30 to in 2016/7) (Table 3.10)
- Scotts Drive residents have shown (via an annotated streetplan of all 12 houses) that the school overstated the number of "unrestricted" car park spaces by almost double. The school's assumptions took no account of the narrowness of the road, nor the two x 90 degree blind bends and dropped kerbs off driveways. Any parking opposite these dropped kerbs causes obstruction and therefore cannot be "unrestricted"
- The TP treats all roads equally (in definitions of size and positions of a parking space) when in fact there is a hierarchy of streets as defined by the Department for Transport. One cannot compare a residential minor access to 12 houses with a much wider local distributor road of 100 + houses
- Emergency ambulances have been impeded on more than one occasion because of badly parked vehicles

7.3 A total of 4 observations from **3 households** have been received:

- The level of pollution is quite high around the school site particularly in the mornings/ cars idling
- Issues with accessing plans
- Less pupils viewed on school bus than on the Travel Plan results

7.4 **Consultees**

The Council's Transport Planner and the School Travel Plan advisor for Richmond Schools has raised no objections to this application. Their detailed comments are incorporated in the assessment below.

8. EXPLANATION OF OFFICER RECOMMENDATION

8.1 The main planning considerations in this case are:

- i Pupil Numbers
- ii Previous Informatives
- iii Travel Plan Surveys and Performance Reviews
- iv Impact on surrounding roads
- v Targets
- vi Action Plan

Issue i – Pupil Numbers

8.2 The school travel plan (STP) does not relate to any increase in pupils for the Gloucester Road site and there is a condition restricting pupil numbers of 144. Any intention to increase the number of pupils in the future would be subject to a further planning application and a separate travel plan and surveys that would be considered in relation to it. In the event of a proposal to increase numbers the Council would also expect a performance related bond to be imposed through a S106 agreement to ensure targets are met and that the STP (School Travel Plan) is continued to be submitted to the Council until such time as the targets and conditions of the bond are suitably met and the modal shift away from the car has been successfully achieved.

8.3 Condition W67172 of planning permission 13/2102/FUL requires 'that no more than 144 pupils shall be on the school roll at any one time and prior to the commencement of the first term of each year in September, the school roll shall be submitted to the Local Planning Authority to confirm such compliance.' Reason: to safeguard the amenities of neighbouring residential properties, to ensure a safe form of development in terms of traffic to & from the site & to accord with the terms of the application

8.4 The school has submitted details of the number of children on the school roll to the local planning authority on an annual basis since the commencement of the development.

Issue ii – Previous Informatives

School Marshalls

8.5 Application 13/2102/DD18 approved in June 2020, had an informative requesting the school to provide school parking marshalls on school days, to monitor the Gloucester

Road entrance and other pupil drop off points in use by parents at the beginning and end of the school day to help lessen the number of incidents of inconsiderate parking / driving behaviour being reported by neighbours. It was suggested that this measure should be included in future versions of the School Travel Plan and was an issue raised by the members at the last committee for this site.

- 8.6 The school undertook the provision of marshalls for a short period but did not carry on due to issues with the insurers. A letter from an insurance broker dated 15th July 2021 was submitted as new evidence with this application stating that *'insurers will not accept a risk of the marshalling of surrounding roads and side-streets by school staff/volunteers. This is not a legal requirement for schools and ultimately not a risk that insurers wish to take on board'* They expect that parking is something the Council would normally enforce and are therefore not willing to support the school undertaking this role.
- 8.7 The insurance broker has approached all reasonable insurers on behalf of the school to come back with a recommendation and have confirmed that they would also not insure the school for marshalling surrounding streets. They have also been advised that 'to re-arrange a comprehensive portfolio of cover with another school's insurer could involve a significant premium increase'. The school state that they do and will continue to marshal in and around the immediate environs of the school, and it will continue to play an active part in ensuring those associated with the school, parents and staff, act responsibly in their use of local roads. The front and rear accesses to the Prep School continue to be monitored each day
- 8.8 It is noted that the proposed provision of parking marshalls on surrounding streets relates to an Informative (U0043625) provided on a decision notice (13/2102/DD18), and is not a condition, therefore it acts as a suggestion to Hampton Prep school. It is disappointing that this has not been pursued to a further level given that it was a specific point raised by members previously, however it is acknowledged that the school has pursued and addressed the issue to a degree and that the informative does not carry any legal weight. Hampton Prep School have confirmed that they will continue to marshal the areas surrounding the school entrances which is further encouraged.

'School and Denmead Neighbours' Association Liaison Group'

- 8.9 When considering the original application for the re-development of the school, Committee Members attached an informative encouraging the school to set up a 'School and Denmead Neighbours Association Liaison Group' that would meet on a regular basis to address and discuss, although not limited to, matters of parking and the school travel plan, that may arise from the use of the site. While these meetings were held regularly for a number of years, these have been limited and moved online for this period due to Covid-19.
- 8.10 The school are still seeking to appoint a chairman having been unsuccessful with a number of people it has approached; the school is encouraged to continue this search. It is considered that these meetings are important for discussing matters that may arise from the school site. As such, an informative is attached requiring these meetings to be resumed.

Issue iii – Travel Plan Surveys and Performance Reviews

- 8.11 The travel survey data obtained from the Prep and Pre-Prep schools, was undertaken on 20th November 2019 (TfL STARS website) in which 203 pupils (100%) and 53 staff (100%) participated. The Travel Plan includes data from both the Prep and Pre-Prep

Schools for completeness however only figures relating to the Prep School are relevant to the condition. Results from the analysis of distance to school for pupils and staff is shown below.

Table 3.1: Postcode Data Analysis Results – Pupils - Prep

Prep	2019/20		2018/19		2017/18	
	Number	Percentage of pupils	Number	Percentage of pupils	Number	Percentage of pupils
live within 1 km	15	10.4%	11	7.7%	18	12.5%
live > 1 km but < 2 km	18	12.5%	25	17.5%	23	16.0%
live > 2 km but < 3 km	3	2.1%	3	2.1%	1	0.7%
live >3 km but < 5 km	19	13.2%	23	16.1%	31	21.5%
live >5 km but < 9 km	50	34.7%	47	32.9%	38	26.4%
live >9 km	39	27.1%	34	23.8%	33	22.9%
	144	100.0%	143	100.0%	144	100.0%

Table 3.4: Postcode Data Analysis Results - Staff (Full and Part Time Prep)

Prep	2019/20		2018/19		2017/18	
	Number	Percentage of staff	Number	Percentage of staff	Number	Percentage of staff
live within 1 km	4	11.4%	3	8.8%	3	9.4%
live > 1 km but < 2 km	6	17.1%	5	14.7%	4	12.5%
live > 2 km but < 3 km	5	14.3%	5	14.7%	2	6.3%
live >3 km but < 5 km	3	8.6%	4	11.8%	5	15.6%
live >5 km but < 9 km	11	31.4%	9	26.5%	8	25.0%
live >9 km	6	17.1%	8	23.5%	10	31.3%
	35	100.0%	34	100.0%	32	100.0%

Hands Up survey

- 8.12 Hands Up survey data was obtained from TfL STARS website and the tables below compare data from 2019-20 with the previous three years' survey results for both pupils and staff. Car share, park and stride and private car/motorcycle use have all been assessed separately

Table 3.5: Hands Up Survey results – Pupils (Prep)

Mode	Hampton Prep School Hands Up Survey							
	(2019-20) 20/11/2019		(2018-19) 14/11/2018		(2017-18) 03/05/2018		(2016-17) 17/11/2016	
Active Travel	23	16%	27	19%	35	25%	25	18%
Walking	16	11%	22	15%	22	16%	14	10%
Scooting	0	0%	1	1%	4	3%	10	7%
Buggy	0	0%	0	0	0	0%	0	0%
Cycling	6	4%	4	3%	9	6%	1	1%
Public Transport	35	24%	21	15%	19	13%	14	11%
Rail/Overground	0	0%	2	1%	2	1%	1	1%
Tube	0	0%	0	0%	0	0%	0	0%
DLR	0	0%	0	0%	0	0%	0	0%
Tram	0	0%	0	0%	0	0%	0	0%
Public bus	2	1%	2	1%	2	1%	5	4%
School Bus/Taxi	33	23%	17	12%	15	11%	8	6%
River	0	0	0	0%	0	0%	0	0%
Car Share	15	10%	14	10%	18	13%	21	15%
Park and Stride	49	34%	49	34%	36	25%	39	28%
Car/Motorcycle	22	15%	31	22%	34	24%	39	28%
Total	144	100%	142	100%	142	100%	138	100%

Table 3.8: Hands Up Survey Results – Staff (Prep)

Mode	Hampton Pre-Prep and Prep School Hands Up Survey							
	(2019-20) 20/11/2019		(2018-19) 14/11/2018		(2017-18) 03/05/2018		(2016-17) 17/11/2016	
Active Travel	16	46%	13	42%	13	43%	8	35%
Walking	12	34%	10	32%	9	30%	6	26%
Scooting	1	3%	0	0%	0	0%	0	0%
Buggy	0	0%	0	0%	0	0%	0	0%
Cycling	3	9%	3	10%	4	13%	2	9%
Public Transport	0	0%	1	3%	3	10%	2	9%
Rail/Overground	0	0%	0	0%	1	3%	1	4%
Tube	0	0%	0	0%	0	0%	0	0%
DLR	0	0%	0	0%	0	0%	0	0%
Tram	0	0%	0	0%	0	0%	0	0%
Public bus	0	0%	1	3%	2	7%	1	4%
School Bus/Taxi	0	0%	0	0%	0	0%	0	0%
River	0	0%	0	0%	0	0%	0	0%
Car Share	1	3%	1	3%	0	0%	0	0%
Park and Stride	1	3%	0	0%	2	7%	0	0%
Car/Motorcycle	17	49%	16	52%	12	40%	13	57%
Total	35	100%	31	100%	30	100%	23	100%

- 8.13 The school uses the TFL STARS (Sustainable Travel: Active, Responsible, Safe). Looking at the last 3 years of STARS figures, there has been a slight decrease in active travel for pupils, but an increase in public transport use, the most significant being on the school bus which increased by 11%. The overall results were still an increase in sustainable travel and a decrease in car travel.

- 8.14 However, active travel is preferred to public transport for health reasons and an increase in bus travel should not be at the expense of the active travel figures. While Independent schools are not bound by the same catchment areas as the state sector, the Council would encourage an increase in active travelling for the prep school for children living within 4 or 5km (around 20-30min cycling) for those who have undergone cycle training. However, it is recognised that not all will be able to travel actively/sustainably. The Council offers cycle, pedestrian and scooter training at the school. The cycle store can accommodate 20 cycles and in the case of the numbers of cycle users increasing could be expanded.
- 8.15 There has been an increase in pupil who live more than 5km away from the school, however overall car related trips have decreased over the past 4 years although it is acknowledged that the figures could be partially skewed by Covid-19.
- 8.16 Staff travel has remained broadly the same since the previous year with a slight increase in sustainable travel with 18 living within 5km of the school and 16 now travelling sustainably.

Issue iv – Impact on surrounding roads

- 8.17 On-street parking surveys were undertaken on Wednesday 20 and Thursday 21 November 2019, covering Gloucester Road, Carlisle Road, Scotts Drive, Wensleydale Gardens, Wensleydale Road and Carlisle Park Car Park. These were carried out between 06.45 and 09.45 in the morning, and between 15.00 and 18.00 during the afternoon. The results are set out below:

Table 3.14 - Morning Parking Stress Survey by Street (Unrestricted)

Wednesday 20 November

Street Name	Morning Peak Survey			
	06.45 Survey Start	School Maximum	08.30 School Start	09.45 Survey End
Carlisle Road	45.2%	61.3%	51.6%	54.8%
Gloucester Road	51.8%	66.2%	61.2%	57.6%
Scotts Drive	31.6%	31.6%	21.1%	26.3%
Wensleydale Gardens	50.0%	81.8%	77.3%	77.3%
Wensleydale Road	36.2%	58.3%	55.1%	54.3%
Carlisle Park Car Park (Demarcated Parking Bays)	8.1%	35.1%	29.7%	18.9%

Thursday 21 November

Street Name	Morning Peak Survey			
	06.45 Survey Start	School Maximum	08.30 School Start	09.45 Survey End
Carlisle Road	45.2%	61.3%	51.6%	54.8%
Gloucester Road	58.8%	66.4%	61.3%	65.5%
Scotts Drive	36.8%	36.8%	31.6%	36.8%
Wensleydale Gardens	40.9%	68.2%	68.2%	63.6%
Wensleydale Road	37.8%	57.5%	55.9%	55.1%
Carlisle Park Car Park (Demarcated Parking Bays)	0%	35.1%	35.1%	21.6%

Table 3.15 - Afternoon Parking Stress Survey by Street (Unrestricted)**Wednesday 20 November**

Street Name	Afternoon Peak Survey			
	15.00 Survey Start	School Maximum	16.00 School Finish	18.00 Survey End
Carlisle Road	58.1%	61.3%	61.3%	48.4%
Gloucester Road	62.6%	64.7%	59.0%	50.4%
Scotts Drive	36.8%	36.8%	31.6%	31.6%
Wensleydale Gardens	90.9%	95.5%	63.6%	13.6%*
Wensleydale Road	60.6%	65.4%	56.7%	33.1%
Carlisle Park Car Park (Demarcated Parking Bays)	51.4%	67.6%	37.8%	10.8%

Thursday 21 November

Street Name	Afternoon Peak Survey			
	15.00 Survey Start	School Maximum	16.00 School Finish	18.00 Survey End
Carlisle Road	58.1%	61.3%	61.3%	48.4%
Gloucester Road	76.5%	87.4%	71.4%	53.8%
Scotts Drive	31.6%	52.6%	52.6%	31.6%
Wensleydale Gardens	86.4%	95.5%	77.3%	63.6%
Wensleydale Road	54.3%	66.1%	54.3%	37.8%
Carlisle Park Car Park (Demarcated Parking Bays)	27.0%	49.9%	37.8%	5.4%

- 8.18 Regarding staff parking off-street, the applicant met the maximum standard of 1 space per 2 employees when the full application was approved in 2014. The results show that a combined number of children, between the pre-prep school and the prep-school, are driven to school, and that employees create overspill from the two sites of up to 14 vehicles. Although this is a concern, the Transport Officer is satisfied that the survey results show that there is enough on-street parking capacity to accommodate 14 employee vehicles in the local area. Regarding parents dropping off and picking up children, this only happens for two short time periods per day, so would not count as overspill, however the results set out in the tables suggest that there is enough capacity to accommodate overspill parking that arises when this occurs.
- 8.19 There is no objection to the use of Carlisle Park Car Park for drop off and pick-up. The use of the park's car park and the access to the school from the park diversifies modes of arrival/departure reducing the emphasis on access from Gloucester Road and the impact on residents who live in it. Parking stress at Carlisle Park Car Park reached a maximum of 67.6% recorded at 3.30pm on Wednesday 20 November, however at all other times during the survey period, the utilisation was lower than 50%, this indicates that there is spare parking capacity within the car park during school drop off and collection times.
- 8.20 It is acknowledged that a lot of the issues with the parking stem from issues on Scotts Drive, Carlisle Road or Wensleydale Gardens, with a majority of the objections relating to those roads. The submitted parking survey, taken at morning and afternoon times shows that roads are still within the levels of capacity that the Council deems acceptable with the exception of Wensleydale Gardens, which does reach near maximum capacity at afternoon collection time. It is not clear if this level of parking is caused by the prep school or the pre prep which is closer to this road and not for consideration in this application. It is also noted that on the other roads the figures at 9.45am were not significantly different than those at drop off time, indicating that there may be other sources of the parking problem.
- 8.21 Neighbours have raised concern with the accuracy of the parking survey and the number of spaces available, in particular on Scotts drive which is a cul-de-sac. The Travel Plan is prepared in accordance with the methodology agreed by Richmond Planning Committee in 2017, as have the proceeding Travel Plans. All subsequent applications regarding the Travel Plan are required to comply with the approved methodology. However, notwithstanding this, the figures for Scotts Drive are not significantly high that if the number of spaces were reduced it would result in maximum capacity. The area is not controlled by a CPZ, and it is not illegal to park in valid spaces along these roads, however the issue appears to be with people parking inconsiderately, in those instances the Council's parking enforcement can take action.
- 8.22 The Council's parking enforcement team have confirmed that they do attend to any call outs about illegal parking in the area and have handed out PCNs on these surrounding roads. They also regularly attend various schools in the Borough at drop off and collection times to check parking situations. In general, the level of PCNs in this vicinity are reasonably low with roughly 6/7 issued per road per year, which is lower than other areas of the Borough. They have said that this is due to the area not being in a CPZ, therefore parking on these streets is not illegal, however any cars parked across drives will be dealt with.

- 8.23 Concern has been raised by neighbouring residents as to whether the parking survey reflects the true picture of the situation on the streets given that the survey was undertaken during Covid-19 period where travel may differ. It is acknowledged that this may have altered the findings to a degree, however Hampton Prep School were required to submit travel plans during this period, and the data collected is considered sufficient to examine the parking issue.
- 8.24 As previously mentioned, it should be further noted that the school are not the only potential reason for traffic and parking issues in the local area, with other local schools and local commuters, including those parking for the Hampton Train Station also contributing towards this issue.

Issue v – Targets

- 8.24 As is mentioned above, the STP (which relates to the Pre-Prep and Prep schools) contains the following targets, which have been suggested by TFL:-

Table 4.1 Mode Share Targets

	Travel mode to and from School %						
	Walking/ Scooting (pupils)	Cycling (pupils)	Park + Stride (pupils)	School Bus (pupils)	Car Sharing (pupils)	Car Sharing (staff)	Car (Inc. Motor cycle) (pupils)
2016-17	17%	1%	20%	-	11%	-	43%
2017-18 Target	20%	4%	20%	-	12%	-	39%
2017-18 Achieved	19%	7%	18%	7%	8%	0%	39%
2018-19 Target	20%	7%	18%	7%	8%	2%	39%
2018-19 Achieved	15%	4%	26%	8%	9%	5%	34%
2019-20 Target	16%	5%	26%	8%	9%	5%	32%
2019-20 Achieved	12%	4%	28%	18%	9%	2%	29%
2020-21 Target*	16%	4%	29%	21%	-	-	30%

*- Targets suggested by TFL

- 8.25 TFL suggests that a 2% car reduction shift is realistic. The targets have been simplified and initiatives for encouraging car sharing for 2020-2021 are not possible due to the Coronavirus legislation, as such, this mode of transport will be discounted.
- 8.26 The Hands Up survey results indicate that the suggested TfL targets for the year have been achieved to a degree. Whilst cycling has remained at 4%, school bus use has significantly increased which remains a sustainable form of travel.
- 8.27 The results will need to be incorporated within the next STP submission though it is acknowledged that COVID may well impact on the modes of travel.

Issue vi – Action Plan

- 8.28 Hampton Pre-Prep and Prep school continue to hold their Gold TfL Stars Accreditation, which is currently valid through to 2022. STARS gold accreditation requires: 8 completed consultations, 40 completed and evidenced activities, a hands up survey, updating of the information, targets and issues pages and a shift from their baseline survey away from car travel of at least 6% OR 90% sustainable travel. Gold is valid for 3 years and they are due a renewal in July 2022.

- 8.29 TFL have paused this year on STARS due to the covid-19 crisis so 2019/2020 and 2020/2021 will act as one year and schools will get an extra year on its current accreditations. Hampton Prep would have submitted by 2021 if schools hadn't shut.
- 8.30 Overall it is considered that the level of activities the school plans annually is impressive, and the work undertaken by the Junior Safety Officers is commendable and highly regarded by the Council and TfL. The school hosted and ran a Junior Travel Ambassador Day last November. The school has been working with the Council Travel Planners and this day was open to all primary and Prep schools in the local borough. School pupils' parents have also been instrumental in creating support for a new level crossing on Broad Lane to make it safer for children to cross a busy road and increase the opportunity for children to walk and cycle independently and safely to school.

9. PLANNING BALANCE AND CONCLUSION

- 9.1 The NPPF is clear at paragraph 109 "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". The submitted Travel Plan demonstrates that this is not the case with Hampton Prep.
- 9.2 It is acknowledged that Covid-19 greatly impacted on the way people travelled throughout this year, notwithstanding this, it is noted that the Transport Officer and Travel Plan Officer are both satisfied with the results submitted. Whilst it is clear from comments received from nearby residents that there is an issue with cars in the neighbouring streets, this appears to be from inconsiderate parking rather than the streets being at capacity. The school have submitted evidence that marshalling further than the immediate area is not possible, therefore this would come under parking enforcement who have confirmed that they have issued PCNs in this area.
- 9.3 The application relates to compliance with a condition requiring the submission and approval of a school travel plan following redevelopment of the Hampton Prep School site. There was no increase in pupil numbers resulting from the development. The submitted travel plan is considered to be acceptable in terms of the information provided relating to the current situation and proposed targets are noted. The applicant has been advised of future targets and provisions which the Council propose should be integral to future travel plans (required on a yearly basis) and will work towards achieving them.

It is recommended that the Planning Committee:

GRANTS the discharge of condition

10. INFORMATIVES RECOMMENDED FOR INCLUSION IF PERMISSION IS GRANTED

Standard Informative:

IL05 – Approved items

For the avoidance of doubt the Drawing(s) No(s) to which this decision refers are as follows:-
Application Form, Cover Letter (received 19/02/2021), Marshalling Letter dated 15 July 2021
(received 03/08/2021), Travel Plan (received 03/11/2021)

Non Standard Informatives:

NS01- School and Neighbours Liaison Group

The school is encouraged to recommence meetings, on a regular basis, of the 'School and Denmead Neighbours Association Liaison Group' to address and discuss, although not limited to, matters of parking, parent behaviours and the school travel plan, that may arise from the use of the site