

From: Cllrs Ruth Dombey, Marlene Heron and Steve Penneck

**PLANNING APPLICATION NO: DM2019/00985 New school on Rosehill Park**

We wish to object to this planning application on the grounds of poor quality design and road safety.

The two schools: 8 form entry secondary school and a special school for pupils with Autistic Spectrum Disorder, are being built by the government, to be operated by Greenshaw Learning Trust.

We accept the need for a second new school in the Borough, and accept that there is no alternative site to the All Weather pitch in Rosehill Park, which was secured following wide consultation on the Local Plan, but are very concerned that the current proposal falls a long way short of what is required given the open nature of the site, the congested traffic already experienced in Rose Hill, and the use of Rose Hill by pupils accessing Greenshaw High School.

We understand that given the need for new schools, any refusal has to be clearly justified. But the National Planning Policy Framework says that: 'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions . . . ' and that 'In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area.' The Framework also says that '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.' In our view the application:

- fails to take the opportunities for improving the character of the area;
- does not offer an outstanding or innovative design; and
- presents an unacceptable impact on highway safety.

Design

The proposal sets out the extensive opportunities the parkland setting gives to a school: 'The site provides a fantastic setting for the new school'. The Council is providing all these benefits for the school, recognising that in doing so we forgo other possible community uses for the site. In return we need a development that the community will recognise as an inspirational community asset that will add value to the park. The applicant acknowledges that the development gives the potential for a new gateway into Sutton, but we do not see this in the current application.

Instead of a design that will inspire students, teachers and the community we have a design that the applicant describe themselves as a '4-storey Superblock'.

The applicant considered seven options for the layout of the buildings. Some of the rejected options offered a stepped elevation to the park; and saved space by putting the MUGA over the car park. The options appraisal is not convincing: the impact on the park does not feature in them, and small changes between the options have a disproportionate effect on the results.

The applicant benefitted from advice from a Design Review Panel (DRP). The DRP is an independent panel of architects and design experts who provide impartial advice on planning applications. In their report they said they were 'disappointed by the limited exploration of meaningful design strategies that sought to improve the quality of this building for users or local people.

'There are still concerns that an over emphasis on constraint, rather than opportunity, are preventing this scheme becoming the quality civic building and inspiring learning environment that the young people of Sutton and future generations deserve.'

The DRP was concerned that creative solutions to articulate the buildings and reduce its footprint, which would to reduce the massing of the building and give a better environment for school pupils and the local community, had not been explored. They were critical of:

- the lack of aspiration the plans presented; and
- the lack of high civic value.

The panel concluded that further work on the scheme was necessary to provide an 'exemplar learning environment that Sutton can be proud of'.

We recognise that the site which is the subject of the application, to the south of the Sports Village, is small and constrained. Sutton Council offered land to the north of the Sports Village to be used as the school car park. If the car park were to be relocated to the north, then the land so released could be used to provide a plan with a more flexible footprint that would give a lesser sense of mass. This option has been rejected by the government. Even without the extra land, more could be done by varying the roof line, and stepping back part of the building to provide a building of higher architectural merit. The school that is proposed is a rectangular block with very few features. Bearing in mind the long views of the school there will be across the park, and the significant location of the site at the northern gateway to Sutton town centre, this is a huge missed opportunity to provide a high quality building that will inspire the learning of young people, and in which the local community can take pride.

In our view, despite the need to give great weight to the need for new schools, we are concerned that this proposal does not meet London and Local planning policies which require it to be of the highest architectural quality and of exemplar design. A better school could be built on this site.

#### Road safety, traffic and parking

There are a number of problems with the Transport Assessment that accompanies the application, which has inconsistencies in its numbers, unrealistic assumptions and omissions. The traffic flow analysis is difficult to understand. For example, it assumes that

- all pupils from the catchment area drawn around the school will walk, and none will be taken by car, cycle or go by bus.
- nearly all pupils will arrive walking north along the west side of Rose Hill, and very few will need to cross that road (apart from those that get on the bus).

It is assumed that 12.2% of pupils will travel to school by car, while for Greenshaw High School, under the same management the figure is 16.4%

There are a number of omissions:

- The study on the traffic lights at the Sutton Common Road by-pass junction looks at additional traffic along the by-pass, but not that along Sutton Common Road. There is no pedestrian flow analysis for this junction as requested by TfL
- It does not consider the congestion there will be from the Angel Hill slip road heading north into Rose Hill
- It does not consider the conflict cause by additional school children crossing Sutton Common Road at the traffic island by its junction with Angel Hill.
- The suggestion from TfL that a pedestrian access to the south of the site to Sutton Common Road, which would relieve pedestrian pressure on Rose Hill, has not been included.
- It is based on the existing car park being the pedestrian access, not the pathway near the bowling green.

In the light of these deficiencies we don't think the assessment provides a sound basis for considering the traffic aspects of this application and ask that a fuller assessment using more realistic assumptions should be undertaken.

Even with these limitations, the Transport Assessment raises concerns:

- The school car park is insufficient for the needs of its staff, who will be taking up nearly all the surplus parking in the park car park. As they will arrive early, Sports Village and park users will have difficulty parking. It is not clear how conflicts will be managed.
- Parents dropping off their children will take up two thirds of available street parking over a wide area. When the Permit Parking Area is introduced in the Aultone Way area, the parking difficulty in other roads will be worsened.
- TfL had raised concerns about crowding at the bus stops. The number of pupils using the two bus stops near Cranleigh Gardens will require the pavement on the western side to be widened, but there is not enough space to widen it to the extent required. The maximum widening possible will leave pupils 'at risk'.
- There are safety issues around pupils using the unregulated crossing (traffic island) near Aultone Way.

The proposal suggests that the safety concerns would be met by school staff being stationed on the streets outside the school; at the Aultone Way crossing; at the Cranleigh Gardens pedestrian crossing; and at the Cranleigh Gardens bus stops. But we doubt whether these measure will be sufficient to allay these safety concerns.

The assessment shows that far from the start and end of the school day being staggered, as we had expected, this will be minimal, and around 90% of pupils will be arriving for 8.30am and leaving at 3pm, which is the same start and end times as Greenshaw High School, which uses the same bus stops.

The broad safety concerns stem from the size of the two schools, and only addressing this is likely to provide a satisfactory conclusion. In our view these concerns are sufficient, together with the poor design for the Planning Committee to refuse this planning application.

#### Use of the park and community use of the school

There is to be a Community use agreement to formalise the arrangements around use of the park by the school. We would ask for a similar agreement for community use of the school facilities which we are pleased to see GLT is keen to encourage.

#### A suggested way forward

There are ways that our concerns could be addressed.

Using the land to the north of the site would provide more opportunities to improve the design of the schools. Even within the current site there are opportunities to move away from the rectangular building, and present an inspirational and exemplary solution.

The traffic, parking and safety issues follow to a great extent from the size of the schools. Consideration should be given to building a smaller 6FE school, with the ASD school on a different site, to provide a school more in harmony with the surrounding environment and infrastructure.

A more comprehensive Transport Assessment is needed with more realistic assumptions.

The start and end of the school day should be staggered more aggressively, and offset with that of Greenshaw High School.

There should be a 20 mph limit and 'No Stopping' restrictions along the west side of Rose Hill.

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