

ORAL STATEMENT TO THE APPEAL HEARING

I am Cllr Steve Penneck, one of the three ward councillors for Sutton North ward where the appeal site is located. We are opposing this appeal on the grounds of poor quality design and road safety, and have submitted some written comments. I will focus particularly on issues of relevance to local residents, namely the external design and the traffic, parking and road safety issues. I speak on behalf of all three ward councillors.

I need to begin by stating that 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 we 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 from nearby Greenshaw High School.

Design

Let me preface discussion of the proposed design by saying a little about the site. It adjoins the St Helier estate, one of the LCC's garden city estates built between the wars, with cottage style houses built around grass enclosures. Across Rose Hill is the Sutton Garden Suburb, built just before the First World War, also echoing garden suburb planning. Rosehill Park is itself the southwestern tip of the Wandle Valley Regional Park, which stretches up the River Wandle to the Thames.

The appellant describes the site as not located within a valued landscape (Mr Gunne-Jones para 6.28). Even if you accept this view, I would not accept this as a reason to perpetuate a poor environment with yet more substandard buildings, but instead expect new development to enhance and improve on the area and set a higher standard.

But in fact, I refute their view. The appellant in their proof of evidence use the description of the site as 'poor quality', from the Council's Characterisation Report of Studies. This report was published in 2008 in support of the previous Local Plan. It uses the assessments from an earlier Townscape/ Landscape Appraisal published in 1998, using fieldwork from 1995-97. The 1998 report describes the area as 'average quality, poorer than average in parts', not 'poor quality', as quoted by the appellants.

In addition, the assessment is 25 years old, and predates many of the features we would now recognise in the park – the expanded Sports Village, the revitalised café, with the shrubberies, and the upgraded children's playground.

The park is formally a Recreation Ground. Its landscape value is less than that of other municipal parks in the Borough, but assessed objectively I would not say it is low quality. And its value to local people is as much its amenity value as its landscape value. It is used in the summer for cricket, and all year round for children's play, recreation and dog walking; and there is a regular funfair each year.

The appellant's proof of evidence says that no local views would be affected by the proposed school. The 1998 Report describes the views more fully. It says there are:

‘Local views within the area: throughout the site area and towards the tennis centre (but also) Local views into the area: (i) from Rosehill Park east; (ii) from residential properties and passing traffic along the major boundary roads (iii) from the higher ground to the east and St Helier hospital towers.’

So there are significant views into the park. Also Rose Hill is the main approach road from London to Sutton. It is the historic highway that linked London to the south coast. There is a milestone on Rose Hill that tells its history as a turnpike road. It is still an important access route, and the green space of Rosehill Park marks the beginning of Sutton town centre. It is a symbol for those entering the town of the ‘greener’ borough we are so proud of. The new school will be clearly visible to those entering Sutton, and what we need here is a landmark building that signifies the entrance to the town centre: a building of architectural excellence that will lead the way for other new developments in the town centre.

We are providing a superb parkland setting for this school. The school will be there for maybe 50 years or longer. In return we need a building that respects the heritage of its environment, and will provide a landmark to the north of Sutton. We also want a building that will inspire its students. The box structure with a uniform height and a flat elevation could be an office block anywhere in the country. It does not respect its context in the park. Using the whole of the available site, including the area to the north of the Sports Village, would have given more options for the design. Dr Horn gives examples in her evidence showing what could be done, including our own Harris Academy school in Belmont.

It is difficult to know what mitigation there could be against the poor design if the appeal is upheld. The proposal does include landscaping which will partly obscure the view of the school from the road, but this will not compensate residents for the loss of part of the park. So I would ask that consideration be given to park improvements, which I will set out at the end of my comments, and also that a condition is added to require an agreement on community use of the school.

Traffic

Turning now to the traffic and road safety implications, the starting point is the original Transport Assessment that accompanied the planning application. And although there has been a host of further documentation since then, and although Mr Hurren’s proof of evidence describes itself as an update to that Assessment, we have not had an update to the impact analysis on which it is based. And as I argued at the Planning Committee, that analysis was flawed. I have set out in my written evidence my concerns about the arbitrary nature of the assumptions made on the number of school journeys by car and the modes of travel to school by pupils in the two catchment areas. The Transport Assessment underestimates the total number of school journeys by car, and the number of pupils approaching the school from the north and west by bus and car, and the number of pupils walking up from the south.

In their proof of evidence on Transport, the applicant has not addressed my concern that an assumption of the average of Sutton schools of 12.2% travelling by car should apply to Rosehill. In Sutton schools the modal share varies between 2.3% to 21.0%, and that for Greenshaw is 16.4%. They describe these differences as 'minor'. A difference of four percentage points adds another 50 car journeys in the morning and again in the afternoon.

The applicant says (para 5.45) that the assumption that all pupils within the 'nearby' catchment area will walk is a worst case scenario to ensure the footways on Rose Hill to north of the site are suitable. This is fine, but this assumption is the only one modelled, and the footways on Rose Hill are not the only concern. His scenario assumes that only 20% of those in southern catchment area walk. The impact analysis only models one scenario – a worst case for walking from the north, but not a worst case for walking from the south. We still, after more than a year do not have a Transport Assessment we can rely on. This would have enabled the impact on the crossing facilities by the Sutton Common Road/ Angel Hill junction, where there is a dangerous bend, to be assessed. Mr Hurren now partially recognises this point (para 5.47) and says additional data could be collected for the School Travel Plan, and a zebra crossing could be installed. But this would be at a later date, and the modelling of such a possibility should have been included in the Transport Assessment. I would urge that an assessment of this need is made, and financial provision for any crossing made before the application is granted.

Since the application was considered by the Planning Committee the Council has introduced a trial 'Low Traffic Neighbourhood' in the residential roads to the east of the school site. This includes temporary road closures designed to encourage cut through traffic to use main roads, such as Rose Hill, rather than residential roads. If it is successful, it will be made permanent. We hope that such schemes encourage drivers to consider other forms of transport: 'modal shift' thereby reducing the overall traffic in an area. But one effect will be to increase traffic along Rose Hill.

The pavement along Rose Hill is very narrow. We are concerned about the safety of children on Rose Hill either crossing the road in numbers or waiting for the bus.

We remain concerned about the safety implications of pupils crossing Rose Hill at other points. There are pedestrian refuges, but these are narrow, and constrained by the width of the road, and we don't feel the mitigation strategy, of stationing school staff at various points, is likely to be fully effective.

There is now a proposal to include a raised table at the car park entrance. This is helpful. But it does not address the issue of children crossing Rose Hill. It is a busy road and there is a need for a zebra crossing near Aultone Way as discussed in the second Road Safety Audit.

As well as improved crossing facilities for school children, there needs to be a 20mph speed restriction on Rosehill, and a 'no waiting/loading' zone to prevent parents from dropping off children on the main road.

Staggered hours

In our written submission we commented on the need for staggered hours for the new school. The original planning application did not include plans for staggering of any significance or for synchronisation with Greenshaw, as we had expected. Now we are told (again) that this was so that the impact of a worse case scenario could be modelled. I agree this is important but the planning application should include details of the arrangements that residents can expect to be the norm. The current proposals will have nearly 1,200 trips entering the site for the 8.30am start and nearly 1,100 leaving soon after 3pm.

Will Smith in his evidence says that there would be a staggered day, and it would be synchronised with Greenshaw. The current pandemic has meant that Greenshaw, in line with other schools, has introduced a greater degree of staggering into its school day. But these are not normal times, and we hope the current situation will not last. In normal times, the Greenshaw staggered day (within the main school) amounts to a 5 min delayed finish for some year groups, which is minimal. As this is important for congestion on the highway, I would ask that this issue is resolved through a condition.

Public car park

It is estimated that 93 staff will drive to the site. Only 68 spaces are provided, so 25 cars will be competing for spaces in the public car park. The applicant says (Hurren para 5.48) that 'Staff will not be parking within the shared car park (ie the public car park) and this can and will be enforced by the Trust'. This is a strong statement. However, it is a free public car park, and staff would have as much right as anyone else to use it. It is not clear whether the Trust would be able to enforce in this way. And as school staff would arrive early they would crowd out other park users. The applicant says that these issues would be managed through a Car Park Management Strategy and a School Travel Plan. But I don't see where the measures are that the school could adopt to make them effective. Unless we believe there are effective strategies, these documents have little value.

Mr Hurren says in his proof of evidence (para 5.49) that pupils being dropped off in the public car park will be directed around to the main pedestrian entrance on Rose Hill, which is an 'inconvenient and a longer route'. The implication is that this longer walking route would act a deterrent, but in fact pupils being dropped off in the public car park would simply walk across the recreation ground to the school entrance. In fact, pupils walking to school from the north along Rose Hill, or the north west, entering the park from the A217 entrance, will walk through the public car park, and then along the footpath or the park on the eastern boundary of the school to its main entrance. There will be potential conflict between pedestrians and cars in the car park which will need to be managed. At the least there needs to be a wider pedestrian path and greater separation from vehicles within the car park.

School pupils will use the pedestrian paths in the park: from the main gate by the bowling green in Rose Hill to the school entrance; from the A217 entrance to the public car park; and from the public car park to the main school entrance. We ask that conditions are imposed requiring these to be widened and resurfaced.

Impact on residential roads

We have raised concerns about the impact of construction workers parking, staff parking and parents dropping off/ picking up in residential roads. For construction workers we need an enforceable ban. The appellant has not responded to the concerns of staff and parent parking (beyond proposing a 'robust' travel plan). Will Smith says that Greenshaw parents sign a letter agreeing not to drop off/ pick up near the school. But a minority still do this, causing congestion and safety issues especially at the end of the school day. Our concerns on this element remain unaddressed. The applicant says that during the afternoon peak time, parental parking will take up two thirds of available parking capacity on residential streets – and this is on their lower modal share figure. There is likely to be conflict between staff and residents as they compete for scarce parking spaces, and new demands for residents' parking areas; and also conflict between parents and residents with waiting on yellow lines and across drives, with demands for more enforcement measures. Both have unfortunately been the case with Greenshaw, leading to the new Aultone Way parking restrictions. We would ask that the Aultone Way Permit Parking Area be strengthened by making it a No Waiting/Loading area to help mitigate these issues.

We repeat the point we made in our written submission that the Transport Assessment, even with all the further documents submitted since the Planning Committee meeting, does not provide a sound basis for assessing the traffic and road safety impact of this application.

On all these grounds, we ask you to dismiss the appeal. If it is dismissed, council officers have set out how the increased numbers of pupils can be managed by existing schools, on a temporary basis.

Officers have also commented that primary school rolls are now likely to start falling, and it may be that a smaller 6FE school (rather than a 8FE school) would be sufficient [Gavin Chinniah Proof of Evidence para 7.30]. The size of the school obviously has a direct impact on the traffic and road safety issues. Dismissal of this appeal would allow time for the Council and DfE to have further discussion on the land to the north, the design of the school and also the size of this school, before a revised planning application is submitted.

Conditions

I accept that you, as the Inspector, will carefully weigh the evidence and come to a balanced recommendation on this appeal. However, the decision will be made by the Secretary of State, and I fear that it is a foregone conclusion that the appeal will be allowed. So, we must pay careful attention to the conditions to be imposed. The appellant makes a number of comments on the draft conditions which suggest that they feel that if issues are covered by the application then conditions are not needed. Can I ask you to ensure that conditions are imposed as needed so that they can be properly enforced? Can I also ask you to consider the following additional conditions:

- An agreement on community use of the school
- An enforceable ban on construction parking in residential roads
- The start and end of the school day to be staggered more aggressively, and offset with that of Greenshaw High School.

- There should be a 20mph limit and 'No Waiting/ Loading' restrictions along the west side of Rose Hill.
- The footpaths within the park should be widened and resurfaced: from the main gate by the bowling green in Rose Hill to the school entrance, from the A217 entrance to the public car park, and from the public car park to the main school entrance.
- Zebra pedestrian crossing facilities across Rose Hill as recommended by the Road Safety Audit.
- A review of the need for a zebra crossing at the Sutton Common Road/Angel Hill junction, with financial provision made before the school opens.
- Pavement widening at bus stop P, with reinstatement of the railings and the hedge.
- Improved vehicle access to the public car park, with a wider pedestrian path and greater separation from vehicles within the car park.
- Waiting/Loading restrictions within the Aultone Way PPA
- Repainting the park railings along Rose Hill

Thank you for your attention.

Cllr Steve Penneck

On behalf of Sutton North Ward Councillors

Sept 2021