

HALL SCHOOL OPPOSITION GROUP

Notes on Objecting

With the 2 week extension, objections should be lodged by 12th January 2017. The Planning Officer has to do his Report more or less immediately for the Planning Committee meeting on 2nd February. So ideally we should all be aiming to dump as much material on his desk around the 12 January. If what he gets is a copy of another submission he will not read it, so even if mine is ready beforehand I will not be circulating it.

I appreciate the problems in producing a submission in the short time available; but must stress the more people who can produce something substantial the better. If that is not possible, please can I ask you by the deadline date to send in a short letter or email giving your name and address and stating you oppose the application; and if possible also going on to say you which of the following planning considerations appropriate to where you live will be adversely affected.

Submissions should be sent to the Planning Officer, David Glasgow, by email to both david.glasgow @camden.gov.uk and planning@camden.gov.uk and/or by post to him at London Borough of Camden, 5 Pancras Square, London N1C 4AG.

In a nutshell the following are Planning Considerations : external appearance and architectural design; over development and its consequences of detrimental impact on residential amenities and the character of the area; effect on the conservation area; visual intrusiveness; loss of privacy and overlooking; overshadowing/loss of light; basement construction implications; tree preservation; noise later on; extra traffic generation later on and its effects on road capacity, car parking ,means of access, and highway safety. Anything going on during the construction itself and all the noise dirt pollution heavy lorries are excluded from being Planning Considerations. These are of course a major concern of everyone, and I will be suggesting later on how they can be mentioned as an addition to other comments; but it is better if they do not appear as the only or main item of objection. While naturally individuals will be most concerned at what is going to be nearest them, they should also object as widely as possible. As an example someone living in Strathray Gardens might not be too worried at the façade of the main building in Crossfield Road, but if the school has problems demolishing the front building it may not want or be able to proceed at the back, and vice versa having been told that the real reason it wants to demolish the front building is to get access to the back..

Before giving some more information on these individual items, basically everyone should be writing their objections in a style they find the easiest either a complete narrative e.g. of what it is like living here and how it will be adversely affected highlighting when this is a planning consideration; or listing out the planning considerations and how the proposals adversely affect these. (In practise I think my own submission will be a mixture of both.) As the Planning Officer told me over the phone he was surprised at the level of opposition I told him about the arrogant aggressive expansionist behaviour of the school, so he in his own words accepted they were 'bad neighbours', so there is no need to hold back on this in you own submissions and how intolerable their behaviour is likely to be if they get what they want.

Having had a quick go through the Related Documents a lot of which is duplication, if anyone has some time those which might be the best to look at will be covered in the following individual items on Planning Considerations and specific Documents. The drawings and technical report do not mean much to me, but might mean more to those with a scientific or architectural background. So if anyone is able to find errors, basic flaws, doubtful methodology or false premises in any of the technical reports; please would they let me know.

Bad Architectural Design Quality (Front and South Elevations)

Pictures of the proposed Front Elevation are in the first document, the Design and Access Statement (D&A) on pages 35 & 36 and on P42 showing as well the existing. Everyone will have their own opinions on the proposals for the larger façade, which have been variously described as bombastic, grandiose and a pastiche design; but generally not in keeping with the conservation area. The existing façade is low key, but perhaps that could be said to be its virtue in blending in with all its neighbouring buildings.

P45 of the D&A shows the proposed south elevation in comparison to the existing. (This is the first time this has been shown, and it was omitted completely both at the Development Management Forum and the glossy newsletter circulated on 14 November which had pictures of all the other elevations). This indicates a plain 4 storey high red brick wall at one end and the blank walled new 4.5 metre structure on top of the sports hall at the other end, even if described as a trellis and vines. While of most concern to those living to the south of it, especially in Eton Court, these walls are more appropriate for a factory building in an industrial estate, rather than in a residential area, and would be an especially bad precedent in a conservation area.

Overdevelopment

There is a useful picture on P.39 of the D&A, to refer to or annex to ones submission, which clearly show how much bigger the new buildings will be compared with the existing. In the document titled LBC CMP Pro Forma, which is in fact the Construction Management Plan which I will deal with separately, on P.9 it states that the gross internal area will be increased from 2714 sq.metres to 3947 sq.metres which is an increase of 45%. This is a huge increase in a constricted site, and a vast over development in a primarily residential area.

In both D&A P.23 and Planning Statement Final P.24 it states that there will be 4 new classrooms. This can variously be described as an error, misrepresentation deliberate or otherwise; but in fact there will be an increase of 7 classrooms, 4 in the enlarged front main building and 3 on top of the sports hall. There will also be a new flexible studios/function/ assembly hall, so together that will duplicate the existing middle school with its assembly hall and 6 classrooms. This is hardly just an upgrade of facilities, as the school has described, and no real explanation has been given for the need for an increase in the physical area of the main building of 45% or extra space sufficient to accommodate all the existing middle school of 108 pupils.

[The next three are particularly relevant to owners and occupants of properties on the west side of Strathray Gardens, east side of Crossfield Road and to the south of the school (such as Eton Court)]

Visual Intrusiveness

The bulk and scale of all the new buildings and their height on the southern elevation, in addition to being bad architecturally and overdevelopment, they will loom over and dominate the skyline.

Those living to the north in Crossfield Road and to the east in Strathray Gardens may be able to raise the same issue. There is a picture in D&A P.44, but it is probably not that helpful in demonstrating the amount of this.

Loss of Privacy and Overlooking

This follows on from the above, which Camden Council raised as an objection to a much more modest proposal in 1999/2000. This does not apply to the south, as there are no windows only blank high walls. But there will be windows facing north in the three new classrooms on top of the sports hall. So anyone living nearby in Strathray Gardens may be able to say they will be overlooked and privacy lost.

Overshadowing/Loss of Light

Again this is part of the same theme, and everyone living to the north may be able to provide personal information to demonstrate that in fact there will be overshadowing or loss of light to their properties or significant parts e.g. the garden; in contradiction to the conclusions in the Daylight Sunlight Report, so anyone who may want to raise this point may wish to look at this report. In doing this report, the authors particularly refer on P.10 to having looked at 12 Crossfield Road and 10 Strathray Gardens, where we have members; and that the windows and rooms receive sufficient light, but that does not necessarily mean that there is no overshadowing or loss of light in the garden.

[The 2 following while at first site may be appearing to be of the same limited interest as the above 3, are of great significance and could affect the outcome of the application, so should be of interest to everyone]

Basement Construction Implications

(I am working on trying to get an expert opinion on whether the premises etc, in the Report are correct, but for the moment we will have to assume that we have nothing substantial on this and the following is written on that basis)

In the Planning Report and BIA, the Basement Impact Assessment is illegible, but so one cannot comment on that but only on the first document near the end of the list, 2879 J15302 . From a layman's reading it recognises on P.24 that more specialist advice is needed. On P.34 it recognises that there is a risk, albeit slight, of damage to 24 Crossfield Road; but there is no recognition or mention that no.24 is part of a row of 9 terraced houses, the construction of which is such that the houses are so interconnected, that damage to one is likely to be felt throughout them all.

Generally the construction of a double basement is recognised as being especially risky, and would be the first in the area and create an unfortunate precedent. Contrary to the comments in the Planning Statement 7.77 on P.34 there are several schools nearby who may feel they have to do the same. This is especially so as no good reason has been given in 7.76 for needing a new basement in the first place under the existing one, so that there will be a new sports hall and on top of that there will be a new flexible function/assembly hall. This ignores the fact that there is a perfectly good assembly hall already in the middle school, and no reason has been given for needing as second. The statement that it might be available for community use implying that

this is a public benefit is very false on a number of grounds; there are already two large facilities available to let which cause enough inconvenience and annoyance to neighbours already, and the school charges for the use of these facilities.

Tree Preservation (Plane Tree)

Again I am talking to Arboriculturists but for this purpose one must assume their technical report, 15204 AA MW which one only knows is about the Plane Tree after opening it, is in order that the roots will not be damaged)

In 2006 the Hall School wished to construct a swimming pool under the playground, which would have required the destruction of the magnificent protected Plane Tree. After Camden Council would not allow this, the school appealed to the Planning Inspector who rejected the appeal, saying that in addition to those who could see the tree, it was an asset to the neighbourhood. So the school realises now it must try and persuade the planners that the tree is safe, but given the history one can be a bit sceptical about how genuine their regard for the tree is. While the school has described the view of the tree as a key feature of their design, this is only so far as their own pupils are concerned, and for everyone else the view of the tree has been ruined; especially from the south, particularly Eton Court, as indicated by the pictures in D&A P.45. Anyone who has pictures of the view of the Plane Tree from their home, especially when in full leaf, may wish to attach them to their submission.

Noise (Post Development)

While everyone in Crossfield Road will be affected by any increased activity at the school resulting in more noise, which will be dealt with next under Extra Traffic Generation, this item is especially appropriate for those houses to the north of the school with gardens at the back, and in particular on the west side of Strathray Gardens.

The design of the 3 new classrooms above the sports hall has the windows facing north. There is a staircase wrapped around the tree giving access to the top storey. The new ground floor assembly/function hall has been deliberately designed with open doors to the playground, and they want to use this for functions in the evenings, weekends and school holidays. So one could argue that the extra noise could be generated almost 24/7.

Extra Traffic Generation (Post Development)

Here it would be useful to set out how one is affected already by the school's activities both during normal school times, and additionally in the evenings, at weekends and holidays. Then adding the concerns that the school will want to use the extra large amount of space for more pupils (including the possibility of its transferring the middle school which looks surplus to requirements to another school) and having an extra large hall which it has said it wants to let out.

Construction Management Plan

This is in LBC CMP Pro Forma half way through the list, and contains the Traffic Management Plan. On all of this the Planners would hope to cover by conditions, and ideally would want us to sit with the developers drawing up the final plans. So while criticisms will not be conclusive, the more failings one can demonstrate the better, which may be argued to cast doubt on their other reports as well.

In para 11 are the full working hours, para 20 platitudes on lorry movements, para 21 lorry types, numbers etc. & details of other developments, para 22 the lorry route as

anticipated and para 24 suspension of parking spaces. Otherwise everything has been left open pending appointment of contractors.

While the lorry route caters for 100 Avenue Road Development by diverting everything down Eton Avenue, no practical information is given of how the developments at the top in Lancaster Grove, at the old fire station in Eton Avenue, and the major blockages in Adelaide Road for HS2 works can be accommodated without gridlocking the whole area.

At the Development Management Forum and subsequently the school were asked to give details of the amount of earth to be excavated and the number of lorries needed for this. They have failed to do this saying they cannot until a contractor has been appointed and they know the size of the lorries. This is ridiculous they must have a good idea on the amount of earth and the likely size of the lorries which can get through the local roads. The refusal to give any information on the number of lorries both for removal of earth and clearing the debris following demolition of the front building means that the other details and figures given in the report, such as in para 21, must be treated with great scepticism. One has seen with the New End development that after planning permission has been obtained, the numbers can increase enormously, in that case to over 60 a day and a total over 6000.

Transport Statement and Hall School Travel Plan

These are probably only there because of Camden's requirements; but they do back up, especially the table on P.12 of the Travel Plan, that the use of cars is enormous and likely to remain so thus backing up any concerns mentioned on future Traffic .

Community Involvement Statement

If one is not sufficiently annoyed already, this is likely to be the final straw. As it has been included to try and show how good the school has been, I feel one should if one can set out the true position. Even by the standards of the PR industry in trying to put a positive spin on things, this document is a travesty.

There was a meeting with the planners already in March 2015, with the Development Management Forum on the 13th September, 18 months later, being the first occasion local residents were given some details of the project. Even after going to both exhibitions on 12 and 15 October and reading the Newsletter circulated on 14 November, although Eton Court was excluded, most details only became clear on reading the Application such as the size and bulk of the new building and what the south elevation is going to look like.

I know I am not alone in my criticisms of the meeting and the statement does not accurately represent what passed. No mention is made of a gentleman from Strathray Gardens being asked to leave for voicing admittedly very forcefully complaints at the existing behaviour of the school, which were only gently confirmed later partly out of politeness but mainly in an attempt to get some more information on the proposals. The Planning Application must have been ready already so as to be lodged on the 16 November, so the statements that various changes were made following consultations with residents cannot be true. We were not given sufficient details to be able to suggest any changes anyway; so if changes have been made they have not emanated from residents.

My wife and I were on picket duty outside the school on 15 October most of the day, relieved over lunch by other supporters, handing out circulars; so I will be able to comment on what they have said here.

The PR consultants are trying to show how attentive the school has been attending to correspondence and arranging meetings. I know David Reed and Brian Harris wrote letters to the school, but would not be surprised if this was the lot from our group; so if anyone else wrote to them please let me know. It is only a bit of an exaggeration that I with my fellow co signatories to the original circular were more or less begged to go to a meeting, and so was David Reed. So again please let me know if you were asked or went to a meeting.

Planning Conditions

The school are likely to say that our concerns will be met by their promising not to increase the number of pupils. So to deal with this in advance, I am intending to say in my submission that the total number of pupils in Crossfield Road could easily increase either by the Middle School being sold or by the school circumventing this by entering into joint arrangements, so in addition the Planning Condition should limit the size of the main building, the Senior School, to 162 pupils as at present. Similarly the only way of controlling the number of out of school events, in the evenings, at weekends and school holidays is a condition that events will not take place at the same time in both the Middle school and the Senior School

In concluding submissions it would be a good idea to ask to be sent copies of any reports, recommendations, decisions etc, and be advised of dates of meetings.

Living where I do, my focus has been on the immediate area of the school, but a lot of the items such as Bad Architectural Design, Over Development, Basement, Extra Traffic can be said to concern the whole area, such as in setting precedent and thinking of the number of other private schools in the Belsize Park ward not just in Eton Avenue.