

HALL SCHOOL OPPOSITION GROUP

VIA EMAIL

25th October 2017

Rob Tulloch Esq.
Senior Planning Officer
Planning Solutions Team
London Borough of Camden
5 Pancras Square
London N1C 4AG

Dear Mr. Tulloch,

Hall School, 23 Crossfield Road, London NW3 4NT
Application No.2016/6319/P

This latest Response has been triggered by the filing on behalf of the Applicants earlier this month firstly of the belated Commentary by Elliott Wood on the initial reports eight months ago of our two Basement construction specialists, Dr. de Freitas (Emeritus Reader in Geology at Imperial College) and Michael Eldred (a chartered civil and structural engineer); and secondly a revised Basement Impact Assessment of 13 documents totalling close to 700 pages. Apart from the Design Summary, in view of the technical nature of the contents in these documents, they have been referred to our two basement consultants; and so the comments at the end of this letter on page 4 on these are limited to those apparent to lay non-professional local residents.

However the Design Summary contains new comments of a more general nature on behalf of the school for their massive redevelopment proposals as a whole with some reference in particular to the existing Wathen Hall under which is a proposed new double basement. While a lot of the objections already made by the Group, its Planning Consultant and individual residents already cover the relevant planning considerations; in view of this new presentation we have felt it appropriate to deal specifically with several of the new comments, especially when they relate to the new double basement application. So for example we have not thought it necessary in this letter to refer to the proposed new structure at the back on top of the existing Wathen Hall as that is covered in our two previous responses of 14 August and 20 September. The proposal is for the excavation of a further basement to be excavated underneath the existing, so in effect the Sports/Theatre/Concert Hall will be moved down a storey, giving space on the ground floor for a new additional Assembly/Function Hall. All that the original Planning Statement of the applicants says on this is on P.33 para 7.76 that "the basement is required to improve an existing institutional use and to provide flexible space which will be available for use by community groups". The statement that it might be available for community use implying that this is a public benefit is misleading ; as there are already two large facilities available to let, being the existing Wathen Hall and the Middle School Assembly/Dining Hall, which cause enough inconvenience and annoyance to neighbours already. Details of the extent of these lettings often of a commercial nature in the evenings at weekends and school holidays have been described in individual responses; and a lot of residents have already strongly objected both on the amount of traffic already engendered by the school and on a third venue as the school proposes in addition out of school hours. The Design Summary has completely ignored this.

While it is difficult to have sufficient knowledge to comment on all the individual assertions in the Design Summary, we feel able to take issue with the following of their numbered points on page 1, which we consider to be variously misleading, disingenuous and irrelevant for dealing with the issue said to be addressed:-

4. While we cannot comment on the use of the Wathen Hall for regular school assemblies, we can definitely state these take place regularly in the Middle school assembly hall. Even if the number of parents able to attend school plays and concerts is limited, this will not be helped by the construction in effect of a new hall under the existing, as the accommodation available in each individual separate hall will not be increased; so the number of spaces for parents will not be increased. If in fact the number of parents could increase this would result in even more cars wishing to park in the streets in the evening, with all the objections to this already mentioned in the previous paragraph. In the last sentence mention is made of the Middle and Junior schools using facilities in the Senior school and regular movement between the sites. Also the senior school pupils attend assemblies in the Middle school and all three sections use the Middle school for lunch; but the important point to make here is that none of the proposed new constructions would affect or minimise this in any way.

5. The three undersigned are able to look over the playground, and it does not seem to be ever really overcrowded, especially when compared with the use of the playground of Hereward House school, which we can also observe. The garden of one of the undersigned adjoins the playground, and while he has raised various issues in his responses about the conduct of pupils, overcrowding is not one of them. In any event the new proposals, in particular for a double basement, would not help with the provision of any more playground space. As regards the IT suite given the miniaturisation that has taken place with the enormous computer power in hand held devices, such as phones or tablets, which all the pupils are likely to have, it is extremely debateable if any more space is needed for an IT suite, and it could be argued that the existing is superfluous.

6 & 8. The existing sports hall is an exceptional facility even by the standards of private schools, which neither of the two nearby schools for pupils of the same age, Hereward House and Trevor Roberts, enjoys. So it is hard to take seriously the assertion of limited sporting facilities, especially as the school has available in Finchley the Wilf Slack centre which it bought in 2010 for £767,000 and then spent £850,000 more on refurbishment.

Before turning to more generalised comments on the issues mentioned in the Design Summary, there are a couple of items on which we would like to comment specifically. Firstly there is mention that extra cycle storage will be provided, which seems calculated to give the impression that more pupils would be willing to cycle to the school if only there was somewhere to store their bikes. At the front of the Middle School there is a cycle rack, which the school has stated can accommodate 24 bicycles. One of the undersigned living opposite the Middle school has previously reported that during term time the usual number is three, with occasionally a maximum of five, and over the last couple of weeks it has gone up to 6 or 7 on some days. So there is no shortage of cycle storage facilities, so that extra provision is a complete red herring, which is unlikely to lead to an increase of the use of bikes as a means of transport. Secondly mention is made of providing better facilities for access by the disabled. These are of course very welcome as part of any refurbishment, although we would say that as mentioned in more detail in the next paragraph we are not convinced that the wholesale demolition of the existing premises is necessary, in particular any constructions above or below the Wathen Hall would seem irrelevant, for improvements to be made. Also the whole ethos and set up of the school, such as the constant movement between buildings, is not particularly suitable or adaptable for anyone disabled, so an unlikely parental choice.

The Hall School has a long history of rather aggressive property acquisition and development. In 1989 it completed the major redevelopment of its main site with the construction of its Centenary building at the front and the Wathen Hall at the back, both of which it now wants to demolish, although it has been suggested that with regard to the former at the front this is only to get access to the rear. Despite being only completed in 1989, very soon thereafter certainly already in 1995, the school were not satisfied and wanted more space. So it applied for planning permission to build the new Middle School (at the corner of Eton Avenue and Crossfield Road) consisting of 6 classrooms and an Assembly/Dining hall. According to the Planning Officer's Report at the time, the school stated that it required the additional classrooms and assembly hall to allow design, technology, computing, science labs and music facilities to be provided in the main building. Anyone around at the time of its redevelopment of its main site in 1989, and then again with its purchase and development of the middle school in 1999, would have expected that would have been sufficient to meet the needs of the Hall School for ever; and certainly would not have anticipated that in 2016 it would be coming back with proposals to increase the size of its main building by 45%; since reduced to 37%. Incidentally many residents are still very upset and aggrieved that the school managed to obtain permission for the Middle School, and have registered this in their responses to the current application. Given this background we must admit to a great deal of scepticism with regard to the reasons set out in the Design Summary, and whether they really reflect educational needs; for despite what is said it is still only a primary school with pupils upto the age of thirteen. We consider that the whole scheme is an example of both the school's past behaviour and the current fashion among headmasters and governors of the local public schools to indulge in large scale vanity legacy projects; and no real effort has been made in considering instead the possibility of refurbishment within the present structure. In coming to this view, we are supported by the fact that the Hall School's existing space and facilities are far superior to those of its two neighbouring private schools, and if there was any real problem with its educational facilities those would have manifested themselves a lot earlier; so for example a dozen years ago it would have not been able to indulge in and devote its energies to the attempt to build an underground swimming pool. In many ways we consider that the changes contemplated are really intended to enable the Hall School to appeal to an even richer ultra high net worth international clientele, so that in addition to a likely future increase in number of pupils to meet the anticipated £20 million cost of the whole project, a lower proportion of pupils are likely to live locally and able to walk or cycle to the school, with even more travelling by private cars and limousines every day. So if the school really wishes to expand in this way, it should not expect to be able to do so in a fairly densely occupied residential area.

Apart from this, the previously expressed fundamental objections remain on the grounds of overdevelopment including the additional double basement; external appearance and bad architectural design; harm to the conservation area; visual intrusiveness; overshadowing/loss of light; overlooking and loss of privacy; and the likelihood later on of additional noise, and the generation of extra traffic and its effects on road capacity, car parking and means of access: together with the comments made in the report of 11 January from our Planning Consultant, Sarah Ballantyne-Way, on the some half a dozen planning considerations which she considers would be grounds for refusing this application together with references to over ten planning policies, guidelines and statements, which would be breached.

Turning to the construction issues on the double basement, Michael de Freitas and Michael Eldred made initial reports of 26 January and 8 February. Following the applicants' new construction plans in March a further report has been filed from Michael Eldred of the 26 April, with supplementary reports from both our advisors lodged on 14 August following the 381 page Basement Update by the applicants in July. The pages of the Elliott Wood Commentary indicate that they were prepared in March with the whole document finalised in April. Accordingly we consider it could and should have appeared on the website some 6 months ago, or at the very latest with the Basement Update in July; and it is to say the least extremely regrettable that it has only appeared with the mass of new material on the revised BIA this month; despite their letter of 17 October saying they were issued in April already. All these items will need some time for proper consideration by our two basement consultants, and we do not think it will be right for us to be prejudiced by any shortage of time in this respect. While we believe it is accepted that we and our basement consultants should have the opportunity of commenting on the report of your assessors, Campbell Reith, before your own report is finalised; we think it would still be far better and sensible for the publication of Campbell Reith's report to wait until they have also had a chance to consider the views of our basement consultants.

Given the apparent lack of too serious consideration expressed in the Commentary by Elliott Wood and the failure to make any changes in the revisions in March and July, it may well be that the views of Michael de Freitas and Michael Eldred, and the concerns of the owners and occupiers of neighbouring properties have continued to be ignored in the latest BIA revisions; but this will have to be checked, and take time.

In our Response of the 14 August we pointed out that the existence of the electricity sub-station site directly on the southern boundary adjoining the basement had not been noted at all, nor any mention of the interconnected adjoining terrace houses; and the Hereward House school art block has been described as at the rear of 5 Strathray Gardens, which address we pointed out was on the other side of the road. None of these errors or omissions has been corrected in the new Site Investigation Report. The plan on page 10 of the Site Investigation Report (being the same as on page 16 of the Revised BIA document) in addition to various clear errors such as showing no. 22 Crossfield Road in the terrace to the south of the school when it is in fact to the north and completely omitting no. 50 Eton Avenue which is part of the modern terrace houses to the south and fills in the gap with Eton Court; while it has noted that the houses in Strathray Gardens have lower ground floors, does not mention that all of the terrace houses to the north in Crossfield Road and Eton Court to the south are of similar construction. The construction of the row of modern terrace houses directly to the south of the school, being in the 1960s is different, so instead the ground floor of all the houses in Crossfield Road is well below street level with several steps down and a steepish slope on the driveways to the original garages. Apart from all this being indicative of a lack of knowledge and attention to detail as regards the neighbourhood, the existence of many rooms below street level could be material in view of the continued strong concerns expressed by Thames Water that the waste and surface water drainage system will not be able to cope with the proposed development. As usual this letter has been signed on behalf of the Group by the three co-signatories to the original circular in October 2016, which led to the Group's formation.

Yours sincerely,

Gabriel Balint-Kurti
40 Eton Court

Ali Hammad
10 Strathray Gardens

Anthony Kay
26 Crossfield Road

Gentet, Matthias

From: [REDACTED]
Sent: 25 October 2017 14:38
To: Tulloch, Rob
Cc: [REDACTED]
Subject: Hall School ref 2016/6319/P
Attachments: HSOG Response 4.doc

Dear Rob,

On behalf of the Hall School Opposition Group, please find attached our latest Response on the documents lodged on behalf of the applicants earlier this month. This deals mainly with the one non-technical document, the Design Summary, and the rest which we have had to refer to our two basement consultants, is briefly covered at the end on the last page 4.

Elliott Wood's Commentary on our consultants initial reports was finalised already in April as is confirmed by EW's letter dated 17 October which says it was "issued in April 2017". Whatever the reason may be for this 6 month delay in publishing it, this has resulted in our consultants having to consider at the same time both EW's Commentary and the 13 new documents comprising close on 700 pages in the Revised BIA. We consider it would be quite unfair and unreasonable for us to be prejudiced because of this, and accordingly think that you should ask Campbell Reith to wait with finalising and publishing their Report until they have received and been able to properly consider our consultants' opinions on both aspects.

Having said that I have spoken to both our consultants earlier today. Michael Eldred has told me he hopes to complete his opinion on EW's Commentary early next week, so before the end of this month, and after that he will be finalising his views on the revised BIA. By contrast Dr.de Freitas thinks that the misunderstandings of his previous Reports and the consequent errors in the BIA and the Revised BIA are so intertwined, so it is better for them to be dealt with by him together.

As you accepted that any items from our consultants, which were not covered in Campbell Reith's report would have to be referred back to them, it seems both much fairer, more sensible and satisfactory, for Campbell Reith to be asked to wait for these to be received in the first place; and it may well be that this procedure would also in the end be less time consuming; and in any event given the amount of material you have to look at on the whole application, not cause any disruption to your own schedule.

Kind regards Anthony Kay tel [REDACTED]