

Planning Department

Ms. Dawn Horton-Baker
Surrey County Council
County Hall
Kingston
KT1 2DY

Your Ref: 2018/0037
Our Ref: MO/18/0640

If telephoning please ask for: Mr A Gardner
Direct Line: 01306 879241
Fax: 01306 879180

aidan.gardner@molevalley.gov.uk

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Dear Ms Horton-Baker

Location: The Priory School, West Bank, Dorking, Surrey RH4 3DG

Proposal: New stand-alone 2 storey science block and DT classroom extension to existing building, addition of 5 No. parking spaces to front of school site and the alterations to on-site car parking and access with removal (retrospectively) of drop-off facility

I refer to your consultation dated 22 October 2019.

The consultation was reported to the Council's Development Management Committee on Wednesday 4 November 2019.

Highways Issues

It is noted that the development proposals incorporate the expansion of the existing school to increase capacity by an additional 300 pupils, with associated staff, from a Five Form Entry School to a Seven Form Entry School. It is further understood that the school installed a set of electronic security gates and fences in 2018 which has resulted in a review of the Transport Assessment and issue of an Addendum by RPS.

It is a fact that planning permission is not required for gates and fences (within certain parameters) as such development benefits from planning permission by virtue of the General Permitted Development Order.

However, the planning history associated with the school is of importance. There are a large number of permissions on the site, some of which refer to Travel Plans as appropriate. One of the most recent applications recorded on the Council's systems is MO/2014/1698 which related to the erection of a detached timber clad building. The building in question had a floor area of 108sqm, which was not likely to accommodate a

significant increase in pupils. The Highway Authority were still mindful of the travel situation on site and recommended the following condition which was impose.

“The development hereby approved shall not be first utilised unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for vehicles to be parked. Thereafter the parking area shall be retained and maintained for its designated purpose.”

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users”

It is reasonable to assert that any changes to the parking situation on the site (including drop off points) must require planning permission and a fall-back position of relying on Permitted Development Rights is not relevant.

Reviewing the Transport Assessment, it is confirmed that the Head Teacher of the school wrote to all parents with regard to the amended gates and access arrangements. It is reported that parents/guardians were informed that they would no longer be able to drop off or pick-up their children from within the school car park and that they would need to find alternative locations to do this. Mole Valley District Council Members have expressed concern that the traffic movements associated with the school before the security gates was a source of nuisance to local residents; it is therefore reasonable to assert that this amendment can only exacerbate the unreasonable impact in terms of traffic movements and disturbance already suffered by local residents.

Although it is acceptable to assert that pupils are being dropped off and picked up outside of the immediate area it is considered unreasonable to rely on parents using either the Wickes or Lidl car park. Such activity may be tolerated by these businesses at this time (there is any evidence of formal agreement to use their car parks for anyone other than their own customers) but it must be noted that ownership can change and the situation cannot be guaranteed. This would suggest that the current baseline, relying on the data in Tables 8 and 9 of the Transport Report, should be discounted.

The fact that RPS's report acknowledges the Authority's statutory duty to ensure that there are sufficient school places, and demand for school places has increased significantly in Dorking and is expected to continue to rise, is surprising. This is not relevant to the Traffic Assessment and one questions whether, if the potential impact was associated with a different use, the same conclusion would be drawn.

RPS comment that site observations have shown that there is some delay to vehicles, particularly school coaches, on Hampstead Lane and Longfield Road during school drop off and pick-up times, i.e. 08:00 - 09:00 and 15:00 - 16:00, but this is over a very short time. It tends to be caused by residents parking on-street and is typical of conditions outside of any other similar sized school. Local residents are entitled to park on the street near to the houses they live in. The fact that delays occur should be attributed to the schools associated with the coaches rather than the existing residents.

Mole Valley District Council trust that the Highway Authority will undertake its own independent assessment with regard to impacts on the highway network and safety for its users.

It is clear that any increase in capacity of schools will generate an associated impact in terms of traffic generation (especially school drop offs and collections).

It is acknowledged that the National Planning Policy Framework (NPPF) advises decision makers that “great weight” should be given to the need for schools to expand¹. It is understood that approval has already been given for the school’s number to expand and therefore the “great weight” to be afforded in this case must be diminished, the expansion having occurred without needing the new building or changes to drop-off points.

Later advice in the NPPF is that, “any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”² Although the term “cost” is not defined it could, and arguably should, include the cost in terms of public interest. In this instance it would appear that the expansion of the school will cause significant disturbance to local residents over and above that already suffered and that the “cost” is to potentially cause greater disturbance by way of imposing parking restrictions on those who already live in the immediate vicinity. The NPPF states that development should only be prevented 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.”³ MVDC would call on the Highways Authority to consider very carefully the evidence and comments submitted by residents who will undoubtedly be affected by this proposal. However, the NPPF also advises that decisions should ensure that proposals, “will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.” This Council is not convinced that the current use functions well in terms of impact on the community and in this respect and are strongly opposed to the application.

FORMAL RESPONSE

In summary, the Executive Head of Service (Place and Environment) would wish to advise Surrey County Council of MVDCs strong opposition to the proposed removal of the availability of the drop-off facilities on the grounds of the impact on the quality of life of local residents.

Should the County Council be minded to approve the development, it is requested that the School be encouraged to strengthen any Travel Plan to foster greener transportation initiatives centred around reduced reliance on the private car.

¹ National Planning Policy Framework Para. 94

² National Planning Policy Framework Para. 108 (c)

³ National Planning Policy Framework Para. 109

Yours sincerely

Aidan Gardner
Senior Planning Officer