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Chief Executive Headteacher
Head of School
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Mrs. N Bull
Mrs. H Hart
Mrs J Christopherson

Monday 1st March 2021

Dear Families,

Please see below the response from our Governing Body to the planning application of two very tall towers on Christchurch Road.

Kind regards,

Mrs Bull

Chief Executive Headteacher

Re: Planning Application 21/P0082 Britannia Point

As the Governing Body of the BeDifferent Federation, we would like to raise our objections to the [planning application](#) reference 21/P0082, seeking to build two very tall towers on Christchurch Rd, next to Britannia Point and immediately opposite Singlegate Primary School.

The proposals include the construction of one 26 storey and one 16 storey block on the small site next to the existing Britannia Point tower.

As a school, staff and Governing Body we have serious objections to the proposed building project on the following grounds:

- 1) The towers are extremely tall and very close to the school - this will inevitably have a significant impact on the **light in the school** in the following ways:
 - The school's access to daylight – there will be more shadow on the school and this will impact on the quality of light both inside the school and the grounds which are used all day by the children
 - 4 classrooms would have their view of the outside and the sky completely obscured as their windows face the towers
 - The [daylight and sunlight report](#) dismisses all concerns about the impact on the school but no consultant has been in the school to do an analysis of the layout of the classrooms. The plans used from 2010 and clearly state they make assumptions regarding layout. In fact, throughout the report they fail to use the correct name of the school, which further demonstrates the lack of research or proper consideration of impacts which went into creating the document.
- 2) Increase in **wind tunnel problems** - The [wind microclimate assessment](#) understates the current issues with the wind, despite the street around Britannia Point being known locally as the wind tunnel. We are very concerned that the addition of these towers will result in:



- Increased difficulties for families, especially our younger children, when walking to school
 - Increased build-up of litter, which is already blown into the school grounds creating a health hazard that has to be cleared regularly
 - The risk of injury to a child, their family or school staff due to flying objects/litter in the wind around the tower
- 3) The **health and wellbeing of the young children** using this site everyday seems to have been completely disregarded throughout this application.
- 4) Concern about the capacity of local **utilities** – the school is providing an essential service and we rely on the utilities, which we fear would be overloaded by the addition of such large buildings on a small site. In particular:
- We already experience sewage backlogs, blockages and odours which have to be managed, particularly in the older section of the school which is closest to the development site. The drains and sewerage system at the corner of the High St and Christchurch Rd is clearly already close to capacity. The new development will increase pressure on an already struggling system and yet there does not appear to be any reference to the significant upgrading of the existing systems that would be required to accommodate this scale of additional development.
- 5) **The build** itself would have a significant impact on the children. Their education has already experienced unprecedented disruption. We are extremely concerned that, for a **minimum of 27 months** but likely longer:
- There would be excessive building noise – all stages of the build are likely to be extremely noisy and with the school so close to the site this will be hard to mitigate during school hours. Currently, all the classrooms have to have windows open for COVID safety, so there would likely be unbearable levels of noise throughout the build. Assuming we move beyond the current COVID Safety measures, the closing of windows would not be sufficient to cancel the noise of this scale of construction and it would be completely unacceptable for children and their teachers to be expected to spend 27+months in classrooms where we are unable to open the windows. Should this development or anything similar go ahead, construction works would need to be severely restricted during school hours.
 - The dust and dirt generated by the build will impact on the children's health. Again, the school is so close to the proposed site it's hard to see how dust will be mitigated and with the windows open to ensure COVID safety and comfort in the classrooms, the children will be exposed over a long period. The measures suggested within the [construction management plan](#) are hardly adequate and seem to fail to acknowledge the presence of the primary school opposite the site.
 - The site traffic will be entering the site and manoeuvring right outside the school which will create mess, noise, disruption and significant additional risk to the children. It will also make it harder for teachers and staff to access the school and this could have a significant impact on essential deliveries and services for the school. The construction management plan completely fails to acknowledge the dangers presented by the volume of heavy traffic that will be generated, particularly given the constraints of the site. It is difficult to see how the construction could possibly be made safe to operate whilst the school is in session.



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- The construction management plan makes no reference to the impact on the school and how they would mitigate for the disruption, noise or safety risks which will inevitably impact on the children, families and staff at the school.
- 6) The **air quality** analysis seems to be based on a monitoring site in a residential street some miles away, distant from the A24 and close to green space. This would appear to make the assessments provided as part of this application completely invalid. We would expect that accurate air quality monitoring be carried out at the site over the course of a 12-month period to ascertain the impact that the works and the subsequent occupation of the site will have on the users of the school – both children and adults. This is something the applicant would have had ample opportunity to do given they own and manage the existing building on the site. The impact of air quality on children’s health is a matter of strong public concern. The analysis carried out as part of this application suggests the applicant do not take this seriously. We most certainly do.
- 7) **Complete lack of engagement** with the school. At no point has anyone from the development company or planning department contacted the school for consultation.
- The [community involvement strategy](#) completely ignores the school. Whilst there may be no statutory requirement to consult with us, the applicants complete failure to contact the school at all would appear to demonstrate their lack of interest in the impact their scheme would have on a vital piece of local infrastructure.
 - Everyday more than 800 children and adults are learning and working at the school, and families and other professionals are in and out of the school all the time. We are a large community right next to the proposed site, yet no one has engaged with us about this enormous planning proposal.
 - We are an important part of the community and the health, safety, wellbeing and comfort of our children and staff should be a priority, yet they are being ignored.
 - There does not appear to be any acknowledgement within this application that the introduction of this number of units will trigger a requirement for 2 additional school entry streams. Further expansion of Singlegate is not possible so an additional school would be required with all attendant costs.

Conclusion

As a Governing Body we object to this planning proposal in the strongest possible terms and ask Merton Council to re-think completely the plans for this small area of land so close to our school and our children’s education.

February 2021



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