

Five Reasons



Why Merton Council Cannot Build on Dundonald Recreation Ground

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INTRODUCTION

There are five major obstacles to proceeding with the plans to expand Dundonald Primary School by building on Dundonald Recreation Ground.

The Restrictive Covenant is the principal barrier to this process.

1. Merton Council have misinterpreted the legal status of Dundonald Recreation Ground and failed to understand the nature of Restrictive Covenants possibly due to poor legal advice.
2. Merton Council has failed to consult properly on the plans and is failing to take into account strong local opposition to building on the Recreation Ground.
3. Merton Council has misrepresented its policy on Public Open Space, demonstrating a clear intention to ignore the Core Planning Strategy as approved by the Planning Inspectorate.
4. Merton Council officers have failed to disclose relevant information on alternative school sites to Council members and have failed to conduct a proper review of the changing situation with regard to site availability.
5. Merton Council's published data does not support their claim that this particular school expansion is necessary. The figures do not show there is an additional requirement for school places in the immediate vicinity, above that already provided by recent expansions of nearby schools.

Merton Council is now in a difficult position because the plans are based on flawed data and misinterpretations of the facts. The Council has failed to take proper advice and gather relevant information bringing the entire decision-making process into question.

Local residents will bring a legal challenge to any building on the Recreation Ground. There will be considerable costs incurred by the Council and delays will mean the building cannot be delivered within the required timescale.

1. THE RESTRICTIVE COVENANT

Merton Councils' legal predecessors –The Local Board of Wimbledon – entered into the Covenant in 1893 when the recreation ground was purchased from the Innes brothers. This is a legally binding contract which ensures the land “shall for ever be used as a public pleasure ground and that no building or other erection not reasonably required for use in connection with a public pleasure ground shall at any time be erected or made upon the said land”.

Merton Council claims that the covenant is “a private law matter” which they will seek to vary. This is a misunderstanding of the legal status of the Restrictive Covenant.

In order to negate the contract/covenant Merton Council has to apply to the Upper Tribunal (Lands Chamber). This process requires an application by one party to the contract, and ‘serving’ of the applicant’s intentions on interested parties (in this case placing notices and advertising). The Tribunal then hears the case in court, considering the application and objections received. The fact that there will be objections to the application will be given considerable weight by the Tribunal.

Protect Dundonald Rec Campaign Group has taken legal advice and has spoken to Upper Tribunal officials about this case. We have been told that successful applications are “extremely rare” and the Covenant would be upheld by the Court. This is because there have been no substantive changes to the legal status of the land since 1893.

An application to the Upper Tribunal is a lengthy process. Merton Council would have to pay court fees and attend court hearings. Tribunal officials with whom we have spoken said it took a minimum of 6-8 months for a straightforward case and up to 2 years if there were objections. Any action by the Council which impacts on the Rec. before the case is concluded would be illegal.

Other legal processes

There is also a Restrictive Covenant on Dundonald Primary School which states: “No building or other erection on the said plot or any part thereof shall at any time be used for any purpose other than as a school or school buildings...”

This also has legal implications, as again an application to the Upper Tribunal may need to be made. In any case, it appears illogical to plead on the one hand that more school buildings are required, whilst applying to turn part of the school building over to community use as indicated in ‘Option C’.

If Merton Council proceed with their plans to build on the Recreation Ground, despite the major flaws in the process outlined in the following pages of this report and against the terms of the Restrictive Covenant, then the Protect Dundonald Rec Campaign Group will apply to the Court for protection of the situation, using whatever process is appropriate to the circumstances. We have taken expert legal advice and have been told that such an action would be very likely to find against Merton Council.

2. THE FLAWED CONSULTATION PROCESS

Poor management and organisation of the consultation process

The leaflets distributed in the original 2010 consultation were “sent out to schools and early years setting”, but not to local residents or park users. There was one advertisement in the local Guardian (which is no longer delivered to many homes) and one in ‘My Merton’, which many people do not read. The low level of response to this ‘consultation’ from Dundonald residents was because most people did not know about the plans.

Merton Council were well aware that there would be opposition to building on Dundonald Recreation Ground. Recent school expansions, notably Hollymount, had been vociferously opposed by local residents. A presentation by the Council on “Delivering sufficient primary school places” identifies “Neighbours v Parents” as one of the key issues. The proposed closure of a public footpath which crosses the Rutlish school site has also been opposed by residents and users.

It was obvious that a proposal to build on a well-used recreation ground would be even more controversial (if local residents were asked) but the Council decided to treat the initial lack of response by Dundonald residents as acquiescence. **By proceeding in this way, the Council gave the impression that a decision in favour of the expansion of Dundonald School had already been taken, and that the only matter to be decided was the format of the building.**

The Cabinet Member for Education, who was spearheading the consultation, admitted at the public meetings that he had been pressing for the expansion of the school for at least seven years. He disseminated his views in a personal letter distributed to over 20,000 residents only days before the consultation began. This compares with some 4,500 official consultation leaflets distributed.

The Council presentation at the public meetings referred to the ‘likely proposal based on Option C’ confirming a response made at the Question and Answer session. Options A and B were clearly not in the running, whatever the public response. This was reinforced by misleading information in the leaflet that only Options A involved the loss of mature trees.

The Council’s Engagement Strategy says that, *“Citizens are quite rightly suspicious of any consultation...where it seems decisions have already been taken. Simply seeking approval for a decision can build cynicism and discourage citizen involvement.”*

Plans changed and vital information withheld on the full implications of the options

No mention was made in the consultation documents of the legal covenant which has helped protect the Rec since 1893 and would be breached, nor of the loss of the bowling green, nor the traffic, parking and construction implications of the proposals on the school, park users or surrounding area. Essential plans of the

options were not included in the leaflet on cost grounds. No priority catchment has been drawn up.

Incorrect information was included in the plans that were put up in the Rec and in the leaflet, and was changed during the consultation period on the web site and presentations.

Trees affected by the proposals were omitted from the plans, and play provision areas were altered on the drawing available on the website, but the plans displayed in the park were not updated.

Furthermore, the consultation options were changed on the web site so that they were different from the original document sent to residents.

Ignoring local opinion

The Council originally planned to issue consultation documents to a small number of households around the school. Under pressure from the Protect Dundonald Rec. Campaign Group, the consultation area was increased to 500m around the school. The Council clearly contravened its own guidelines. It has now acknowledged that it underestimated the level of interest and size of the response and that with hindsight 'might have put more resources into the publicity material at the outset to prevent some confusion'.

Over 2,100 local residents and users of Dundonald Recreation Ground signed a petition against building on the Rec. Over 380 people wrote to the Council expressing their opinions, the majority of which were against building on the recreation ground.

Merton's Community Engagement Strategy says, "*Citizens should be confident that their voice has been heard and that the decision being taken has been informed by the views of those effected by it.*" **Will the Council now listen to local residents who care about preserving a Public Open Space and recreational amenity?**

Essential studies not undertaken

The Council has refused to undertake essential studies to inform the consultation. It is not difficult to imagine the scale of impact of key factors on the park and neighbourhood such as :

Loss of Trees

All three options involve the loss of some mature trees, contrary to the consultation information. These currently help soften the effect of the school buildings and provide shade to the children's play area. They include one of the venerable Scots pines that surround the school together with either the trees along the school wall or some in the children's play area. The memorial tree planted in memory of PCSO Martyn Angiolini is at the heart of the building site. Additional loss or damage from the site access road and construction traffic is also likely.

The Council has refused to undertake a full tree survey or assessment of the need for Tree Preservation Orders until a decision on submitting a planning application is taken. This information should have been available in advance to consultees, Council members and the Cabinet.

Priority Catchment

The Council will not publish a catchment map for an expanded Dundonald School or its neighbours but is on record as saying that the existing catchment of approximately 300m will expand to 500m for the 'bulge' year being accommodated this September and up to 1,000m for the expanded school. This is not the 'local' area.

Traffic and parking

The increased in school traffic will be more than proportional to school size because parents are more likely to drive from the wider catchment. All the local roads are already busy and congested. In addition, a doubling of pupil numbers and related staffing will increase demand for parking and pick-up and drop-off of pupils. There is a disproportionate increase in risk for pupils, parents and local residents.

Construction Impact

The Council has obfuscated about the time scale of the construction. Public pronouncements are that it will take "a year" but no studies appear to have been carried out to support this estimate. How much and which parts of the site will be unavailable for how long? The Recreation Ground is in use every day of the year.

The impact of construction includes:

- A large fenced-off area comprising not just the building footprint, but also an area around it to allow the building work to proceed; a large construction storage area and an access road for construction traffic, probably from the Fairlawn/Avebury gate. This traffic will have to travel down residential roads such as Merton Hall Road, Avebury Road or Wilton Crescent.
- The school dining building will be unusable due to incorporation into the new building and a sizeable part of the school playground will have to be fenced off. The tennis court area used by both school and public will be occupied by building works.
- The children's play area will have to be closed as part will have to accommodate the new building.
- There will be severe noise and disruption to the school, the Rose Garden and the rest of the park and its neighbours.

The Engagement Strategy says that *'Decision makers must be open about the options that are available and honest about the implications of the decisions. This enables citizens to understand what they can influence and how it will affect them.'*

It is clear that this consultation has failed to meet the required standards of openness and honesty.

3. BUILDING ON PUBLIC OPEN SPACE

All of the 48,000m² of Dundonald Recreation Ground, including the pavilion, is shown as Public Open Space in all the Council's planning documents.

The Council has promoted the scheme by stating that the proposed school expansion will result in a negligible loss of open space as follows:

- Option A – loss of 157m²
- Option B – loss of 111m²
- Option C – loss of 53m²

The above figures are calculated by subtracting the footprint of the existing pavilion (414m²), which is currently Open Space, from the total footprint of the proposed new building thereby implying that 414m² of the new building should still be considered as open space.

In order to fully understand and be able to evaluate the Council's claims, it is important to consider the legal definition of Open Space.

DEFINITION OF OPEN SPACE IN ACCORDANCE WITH PPG17

“Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. However, in applying the policies in this Guidance, open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity.”

PPG 17 then further defines typologies of open space that may be of public value, including:

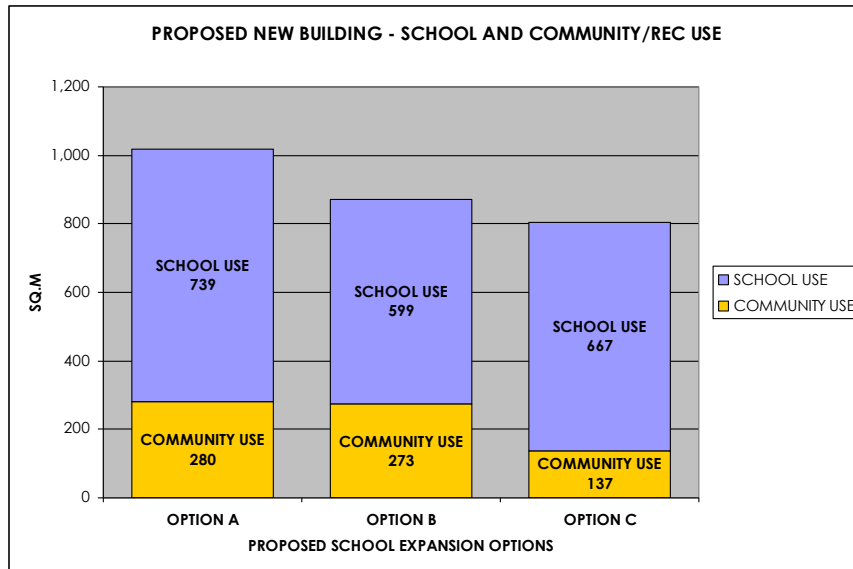
- parks and gardens
- natural and semi-natural urban green spaces
- green corridors
- outdoor sports facilities
- amenity green space
- provision for children and teenagers - including play areas, skateboard parks, outdoor basketball hoops, and other more informal areas
- allotments, community gardens, and city (urban) farms
- cemeteries and churchyards
- accessible countryside in urban fringe areas
- civic spaces, including civic and market squares, and other hard surfaced areas designed for pedestrians

In PPG17, there is no mention of school buildings as Open Space.

In all options, the majority of the new building will be dedicated to school use.

Net loss of community and recreation accommodation

The new building footprint will only be partially dedicated to community and recreational use and, in the case of Option C, most of the community space would be incorporated into the existing school building making it inaccessible to users of the cricket and football pitches.



Surely this cannot still be considered Public Open Space?

Only areas of the new building that are exclusively dedicated to community should still be considered as open space and, consequently the principle of the Council’s calculations is flawed.

Our calculations show that the actual loss of open space will be as follows:

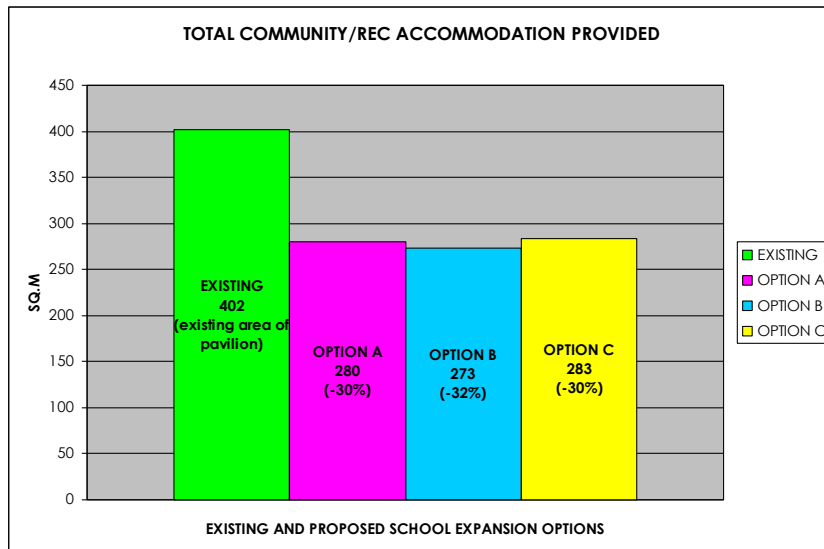
- Option A – loss of 291m²
- Option B – loss of 252m²
- Option C – loss of 330m²

The other consideration is that currently the pavilion is a low-rise single storey building with a flat roof, which is screened by trees and blends into the surrounding green space.

The new proposed school building will be a two storey building, lower than the three storey main school building, but higher than the current two storey annexe. It will have a larger footprint than the existing pavilion.

How can this be considered open space as visual amenity?

In all proposed development options there is a significant average 30% loss of space available for community and recreation facilities.

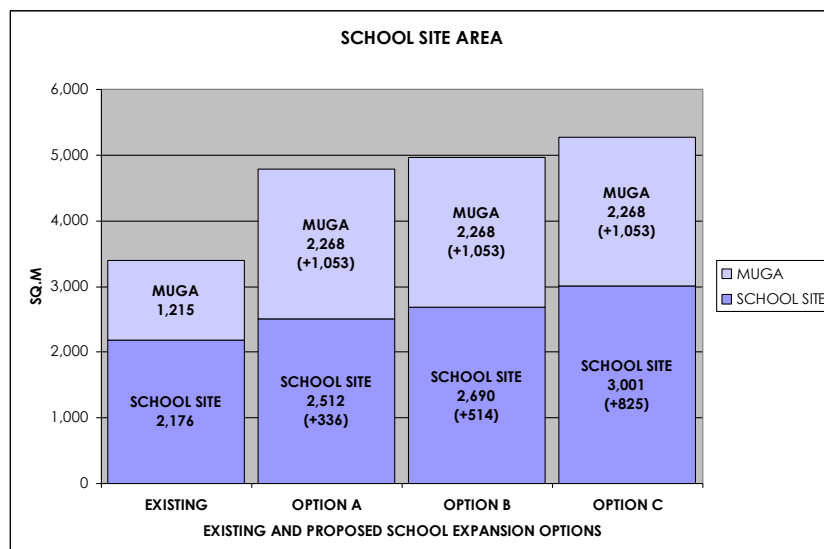


Size of School site and loss of recreational space

The Multi Use Games Areas or MUGA, otherwise known to the locals as *"the tennis courts"*, were recently made unavailable to the public during school hours.

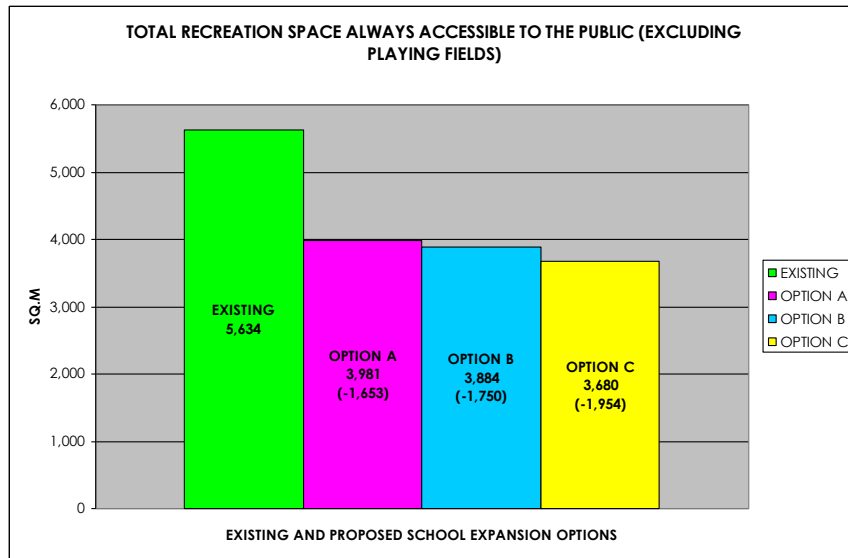
This decision was implemented without any consultation with the local community or formal appropriation procedure, despite the fact that the school does not own this land. The 'MUGA' is part of the Recreation Ground and should be at all times available for public use.

These new arrangements have made it extremely difficult for any member of the public to use these areas during term time, making them effectively available for the exclusive use of the school.



When assessing the loss of recreation space and the actual size of the school site, it is crucial to consider the loss of public access to the MUGA and the fact that these would be increased in size in all options, under the false pretence of being 'communal'.

As the 'MUGA' is effectively going to be for the exclusive use of the school during term time, it is a net gain to the school site and a net loss to the recreation facilities.



If the loss of recreation space is compared with the total area of the Rec, including the playing fields, this then would amount to 3.5% to 4% of the total 48,000m². The Council's claim that only 0.21% of 'open space' will be lost is a misrepresentation of their own data and of the plans.

Common sense suggests that if a crowded school site of 2,000m² doubled its pupil intake, then an additional 2,000m² will be required to accommodate them, and this is indeed what the calculations show.

“Unused space”

The Council claims that some parts of the Rec, specifically the area around the pavilion, are 'unused'. This is because the area between the pavilion and the bowling green is fenced off, with locked gates at each end, preventing it from being used by anyone who does not have a key.

In fact, this area can be accessed from the pavilion, so pavilion users can and do use this as an outdoor play or seating area when the weather is fine. It is also used by the bowling club to access the green.

If the gates were unlocked and left open this area would provide a thoroughfare or seating. It is not unused.

NOTE:

For supporting data and calculations, please see Appendix A at the end of this report.

4. AVAILABILITY OF ALTERNATIVE SITES

Merton's case for expanding Dundonald School is partly based on the absence of any alternative site. This was stated by Councillor Peter Walker in response to a question at the public consultation meeting on 22 June 2011. The only alternative was, he said, "a fleet of yellow buses taking children to Morden or Mitcham".

A report in the summer of 2010 by officers in the Council's Environment and Regeneration Department's Property Review team and Physical Regeneration team identifies a number of sites considered for new primary schools or school expansions. This was neither released to Council members nor to the Planning Inspectorate as it was deemed 'commercially sensitive'. It has now been made available following two Freedom of Information requests.

Fourteen sites are short-listed, as shown below, and include Dundonald Road West Goods Yard and Durnsford Recreation Ground. **Dundonald Recreation Ground is not even mentioned on the full list.**

Not all of the sites are commercial - for example, 18 Arthur Road is part of the Ricards Lodge school site.

Location	Score (10-17 for short-list)	Current situation (PDR comments)
Wimbledon Park School / Durnsford Rd Rec.	15	School expanded
Dairy Crest 53 Gap Road	14	
Safe Store 67 Gap Road	14	
Vantage Ho. Weir Road	14	
All Saints Primary, Hanover Road SW19 1AR	13	School expanded
East Road (adjacent to All Saints Primary)	13	***
18 Arthur Road SW19 (Ricards Lodge/Bishop Gilpin)	12	
Dundonald Road West Goods Yard SW19	12	
Virgin Health Club, North Road, SW19 1AQ	11	
Wimbledon Leisure Centre	11	Refurbished
South Wimbledon Community Centre 74 Haydons Rd SW19 1HL	11	Poss expansion of All Saints
Atkinson Morley Hospital, Copse Hill	11	Sold for housing
B&Q site Alexander Road SW19	10	Sold for retail development
115 The Ridgeway	10	

*** *Ex caretakers house plus house ex school. 18 Arthur Road, SW19.*

"Site area 2,914 and 3,000. Site would need additional land currently within adjoining school. This school is wishing to expand and is looking to this site for such expansion. In favour this is a deliverable site which could share facilities with the High School." Source: Merton Council

An analysis of school sites and their potential for expansion was published with Council Minutes of 11th Oct 2010. This shows:

- Dundonald is by far the smallest school site in Merton with only 2,094m²
- Three schools within a one mile radius of Dundonald have only one FoE: Merton Abbey, Merton Park and Pelham.
- Merton Abbey is considered a “possible” site for expansion of 10,251m²
- Merton Park’s site of 3,430m² is considered “too constrained”; although much larger than Dundonald’s
- Pelham’s site of 5,914m² is considered “tight” although, again, it is much larger than Dundonald’s.

When these assessments were carried out, Merton Council was looking for an additional *seven* forms of entry across the borough, plus another ‘bulge year’. In fact the Council has achieved an additional *eight* forms of entry plus the Dundonald ‘bulge year’. Council projections show that a further two forms of entry may be required for 2012/13 and an additional three for 2013/14. There are 25 primary schools in Merton which have not been expanded. All of them have considerably larger sites than Dundonald.

In addition to previously considered sites, some of which may still be available, Merton Council has recently been offered, by Rutlish School, a suitable site for building a new primary school.

Selling off sites for housing

Merton’s Community Plan 2011 reveals *“a population increase of 13.93% over the last four years – the largest increase of any outer London borough. Merton is now the fourth most densely populated outer London borough due to more people arriving than leaving.”* The consequences of this are obvious: Public Open Space is even more essential in a densely populated community - and an increasing population leads to greater demand for public services, including school places.

Over the last twenty years Merton's Labour and Conservative councillors have sold schools and playing fields, mostly for high density housing - land that could have been used now. Despite the recognition that this was a mistake and that the number of children in Merton requiring school places is predicted to rise further, the Council continues its policy of selling land.

Merton’s Community Plan states, *“Green space in Merton is valued and there is public concern that increased housing development in the borough may reduce this. For communities to be sustainable, it is important to have a mix of local housing, open space, jobs and services. Leisure and other facilities need to be readily available to local residents including young people.”*

The Council must urgently address the policies which have resulted in unsustainable growth and pressure on our schools.

5. DEMAND FOR LOCAL SCHOOL PLACES

The Council claims “the birth rate in Merton has risen by over 30% in the past six years” (2003 to 2009). In the latest edition of *My Merton* they claim a 39% increase in “birth rate” between 2002 and 2010.

The number of births has increased, as shown in the following table, but the greatest increases were in 2003 (following a drop in 2002) and 2007. The latest Office for National Statistics birth data shows that just 59 more babies were born to Merton mothers in 2010 than in 2009.

Births registered to mothers resident in Merton, 2001-2010			
Year	Number of births	Year-on-year change	
		Number	%
2001	2,664		
2002	2,535	-129	- 4.84%
2003	2,737	202	7.97%
2004	2,828	91	3.32%
2005	2,925	97	3.43%
2006	3,092	167	5.71%
2007	3,330	238	7.70%
2008	3,330	0	0.00%
2009	3,462	132	3.96%
2010	3,521	59	1.70%

Source: Office for National Statistics

In fact the number of births is a poor predictor of demand for school places.

The Council’s ‘model’, which takes the number of births minus a percentage is, according to Tom Proctor, simple to use. Unfortunately it has failed to predict demand in recent years, so the Council never knows how many applications they are likely to receive, or where from.

The data and methods of analysis used by the Council are inadequate and do not facilitate effective decision-making.

Minutes from the meeting of the Children and Young Person Overview and Scrutiny Panel on 11 Oct 2010 state that “*there needs to be more expansion in the north of the borough and specifically in the north and centre of Wimbledon, Colliers Wood and the north of Mitcham.*”

But this demand is not local to Dundonald:

“The South Wimbledon Centre and Dundonald are approximately one mile away from the parts of Wimbledon – in the north/north east parts - where lack of opportunity to access a local school is being experienced.” (Minutes 11 Oct 2010)

Dundonald School is poorly placed to meet demand from the North and East of Wimbledon as it has poor access from the north and east – main roads and the railway have to be crossed, there is a one-way system, width restrictions, a level crossing and no parking spaces. This is recognized in the same minutes:

“Public transport links are straightforward and, although use of private cars could be difficult as journeys would, typically, involve traversing Wimbledon town centre, the administration may consider this a benefit for the option rather than a risk.”

It is unclear as to why traversing Wimbledon town centre is considered “a benefit”.

Further acknowledgement that demand is not within Dundonald’s immediate vicinity is evident from another statement in the same minutes:

“Dundonald and possibly South Wimbledon Centre would require Priority Areas for admissions were this option to be progressed to mitigate risk of over and under supply issues around both schools”

Population data published by Merton Council indicates that demand for school places from central Wimbledon should, in fact, be relatively low. The centre of Wimbledon has few residential units: it is mostly shops and businesses with some flats (not family accommodation). Indeed the four wards which comprise Central Wimbledon have the lowest proportion of families with dependent children in the entire borough (under 22%). By contrast, in the top four wards, over 35% of households include dependent children.

Households with dependent children as a % of all households (top and bottom wards ranked in order)		
Ward	% of households	
Pollards Hill	40.06	<i>Households with the highest proportion of dependent children</i>
Longthornton	36.28	
Cricket Green	36.10	
Figge's Marsh	35.67	
Trinity	21.30	<i>Households with the lowest proportion of dependent children</i>
Abbey	19.54	
Dundonald	19.18	
Hillside	16.21	

Source: Merton Council Ward data (for full table see Appendix B)

Merton Council has an obligation to provide school places for all children, but according to central government guidelines for primary school children in an urban area, this should be within 2 miles of their homes.

The vast majority of households in Merton live within 500m (under one third of a mile) of a primary school.

The Council claims that Dundonald must expand to meet the local increase in the 'birth rate'.

There are 10 primary schools within 1 mile radius of Dundonald. Six of these have admitted an additional FoE in 2010 or 2011. These ten schools plus Dundonald had 14 FoE (420 places) in 2007/08. In 2012 this will have increased to 20 FoE (600 places), not including the Dundonald bulge year. This is a 43% increase in provision of places for five year olds.

School expansions within one mile of Dundonald				
School	Places 2007/08	Places 2011/12	FoE 2011/12	% increase in provision
Bishop Gilpin C of E	60	60	2	
Hollymount	30	60	2	
Joseph Hood	30	60	2	
Holy Trinity C of E	30	60	2	
Dundonald	30	30*	1*	
Merton Abbey	30	30	1	
Merton Park	30	30	1	
Pelham	30	30	1	
St Mary's Catholic	30	60	2	
The Priory CofE	60	90	3	
Wimbledon Chase	60	90	3	
Total	420	600	20	42.86

*The above figures exclude the Dundonald 'bulge' year (2011)

Source: Merton Council's data on places offered

Analysis of the number of places offered in each 'schools planning area' similarly shows that in 'planning area 3' (which includes Dundonald) the increase in provision more than meets the increase in births. This suggests that pupils will be brought in from other areas, where provision will fail to meet the rise in births.

The Council's definition of 'demand' is based on the number of applications for school places and, once places have been offered, on the waiting list for places at particular schools. Parents are able to specify up to six state primary school anywhere in the borough and may remain on the waiting list for their preferred school while accepting a place elsewhere. The 'waiting list' is therefore not an accurate measure of demand or need.

Unconditional application of the sibling rule also distorts 'demand'. In the case of Dundonald, each year a handful of children who live just over 300m away from the school are not offered places because these places have been offered to siblings in families who live more than 1km from the school.

NOTE:

For supporting data and calculations, please see Appendix B at the end of this report.

APPENDIX A - DATA AND CALCULATIONS

PROPOSED NEW BUILDING

		PROPOSED SCHOOL EXPANSION				
		EXISTING areas (m ²)	OPTION A areas (m ²)	OPTION B areas (m ²)	OPTION C areas (m ²)	
PROPOSED BUILDING	NEW	TOTAL EXISTING PAVILION FOOTPRINT (m ²)	414			
		TOTAL NEW BUILDING FOOTPRINT		571	525	467
		SCHOOL ACCOMMODATION NEW BUILD (GIFA) - GROUND FLOOR		210	139	225
		SCHOOL ACCOMMODATION EXISTING RETAINED/REFURBISHED - GROUND FLOOR		80	80	80
		COMMUNITY/REC ACCOMMODATION NEW BUILD - GROUND FLOOR		280	273	137
		COMMUNITY/REC ACCOMMODATION IN EXISTING SCHOOL BUILDING - GROUND FLOOR		0	0	146
		TOTAL GROUND FLOOR ACCOMMODATION		570	492	588
		SCHOOL ACCOMMODATION NEW BUILD (GIFA) - FIRST FLOOR		529	460	442
		SCHOOL ACCOMMODATION EXISTING RETAINED/REFURBISHED - FIRST FLOOR		80	80	80
		TOTAL FIRST FLOOR ACCOMMODATION		609	540	522
		SCHOOL ACCOMMODATION EXISTING RETAINED/REFURBISHED		160	160	160
		SCHOOL ACCOMMODATION NEW BUILD (GIFA)		739	599	667
		TOTAL SCHOOL ACCOMMODATION		899	759	827

RECREATION/COMMUNITY ACCOMMODATION - COMPARISON BETWEEN EXISTING AND PROPOSED

		PROPOSED SCHOOL EXPANSION				
		EXISTING areas (m ²)	OPTION A areas (m ²)	OPTION B areas (m ²)	OPTION C areas (m ²)	
LOSS OF RECREATION/COMMUNITY ACCOMMODATION	OF	TOTAL EXISTING COMMUNITY/REC ACCOMMODATION (m ²)	402			
		TOTAL COMMUNITY/REC ACCOMMODATION NEW BUILD		280	273	137
		TOTAL COMMUNITY/REC ACCOMMODATION IN EXISTING SCHOOL BUILDING		0	0	146
		TOTAL COMMUNITY/REC ACCOMMODATION		280	273	283
		TOTAL LOSS OF EXISTING COMMUNITY/REC ACCOMMODATION		-122	-129	-119
		TOTAL LOSS OF EXISTING COMMUNITY/REC ACCOMMODATION %		-30%	-32%	-30%

RECREATION SPACE - COMPARISON BETWEEN EXISTING AND PROPOSED

		PROPOSED SCHOOL EXPANSION				
		EXISTING areas (m ²)	OPTION A areas (m ²)	OPTION B areas (m ²)	OPTION C areas (m ²)	
SCHOOL SITE		EXISTING SCHOOL BUILDINGS FOOTPRINT	949	949	949	949
		SCHOOL ACCOMMODATION NEW BUILD (GIFA) - GROUND FLOOR	0	210	139	225
		FLOAT	215	215	215	215
		EXTERNAL PLAY	814	733	982	1,010
		FOUNDATION PLAY	198	405	405	602
		TOTAL SCHOOL SITE AREA	2,176	2,512	2,690	3,001
		INCREASE IN SCHOOL SITE AREA		+ 336	+ 514	+ 825
MUGA		MUGA (public access only out of school hours)	1,215	2,268	2,268	2,268
		TOTAL SCHOOL SITE AREA INCLUDING MUGA (during school hours)	3,391	4,780	4,958	5,269
		TOTAL INCREASE IN SCHOOL SITE AREA INCLUDING MUGA	+ 1,215	+ 2,604	+ 2,782	+ 3,093
RECREATION SPACE EXCLUDING PLAYING FIELDS		RECREATION/COMMUNITY ACCOMMODATION	414	280	273	283
		CHILDREN'S PUBLIC PLAYGROUND	1,248	1,320	1,144	1,484
		GREEN	350	0	0	0
		BOWLING GREEN	1,352	0	0	0
		PUBLIC PATH	707	553	639	630
		PUBLIC GREEN SPACE	1,563	1,828	1,828	1,283
		TOTAL RECREATION SPACE ACCESSIBLE AT ALL TIMES	5,634	3,981	3,884	3,680
		LOSS OF RECREATION SPACE ACCESSIBLE AT ALL TIMES		-1,653	-1,750	-1,954
		TOTAL RECREATION SPACE (including MUGA) ACCESSIBLE ONLY OUT OF SCHOOL HOURS	6,849	6,249	6,152	5,948
		LOSS OF RECREATION SPACE ACCESSIBLE ONLY OUT OF SCHOOL HOURS		-600	-697	-901

NOTE: THE ABOVE APPRAISAL IS BASED ON INFORMATION PROVIDED BY MERTON COUNCIL. IN PARTICULAR, HAVERSTOCK ASSOCIATES LLP DRAWINGS No. 951_005 REV. A: Sheet 01, 951_005 REV. A: Sheet 02, 951_005 REV. A: Sheet 03, 951_005 REV. A: Sheet 04, 951_005 REV. A: Sheet 05, 0066 REV. B, 951-0078, 951-0079, 951-0080, 0063 REV. C, 951-0069, 951-0070, 951-0071, 0064 REV. C, 951-0072, 951-0073, 951-0074, 0065 REV. B, 951-0075B, 951-0076B, 951-0077A.

APPENDIX B - ADDITIONAL DATA ON SCHOOL PLACES

BIRTHS BY ACADEMIC YEAR				
Birth year	Entering school	Number	Increase (number) by year	Increase (%) by year
2002/03	2007/08	2612		
2003/04	2008/09	2785	173	6.62
2004/05	2009/10	2893	108	3.88
2005/06	2010/11	2972	79	2.73
2006/07	2011/12	3250	278	9.35
2007/08	2012/13	3320	70	2.15
2008/09	2013/14	3419	99	2.98
Total increase			807	30.90

SCHOOL PLACES AVAILABLE BY ACADEMIC YEAR				
Birth year	Entering school	Number	Increase (number)	Increase (%) by year
2002/03	2007/08	2100		
2003/04	2008/09	2190	90	4.29
2004/05	2009/10	2280	90	4.11
2005/06	2010/11	2370	90	3.95
2006/07	2011/12	2640	270	11.39
2007/08	2012/13 **	2700	60	2.27
2008/09	2013/14 **	2790	90	3.33
Total increase			690	32.86

** projections

COMPARISON BIRTHS v SCHOOL PLACES				
Birth year	Entering school	BIRTHS (% increase)	PLACES (% increase)	% Retention Birth to Places
2002/03	2007/08			80.40
2003/04	2008/09	6.62	4.29	78.64
2004/05	2009/10	3.88	4.11	78.81
2005/06	2010/11	2.73	3.95	79.74
2006/07	2011/12	9.35	11.39	81.23
2007/08	2012/13	2.15	2.27	81.32
2008/09	2013/14	2.98	3.33	81.60
Total increase		30.90	30.00	

SCHOOL PLACES AVAILABLE AND FORMS OF ENTRY BY ACADEMIC YEAR				
Entering school	Number	Increase (%)	Total FoE	Additional FoE offered
2007/08	2100		70	
2008/09	2190	4.29	73	3
2009/10	2280	4.11	76	3
2010/11	2370	3.95	79	3
2011/12	2640	11.40	88	9
2012/13 **	2700	2.27	90	?2
2013/14 **	2790	3.33	93	?3

** projections

BIRTHS AND SCHOOL PLACES BY PLANNING AREAS			
Planning area	Wards included	% of increase in births 2002-2009	% increase in school places 2007-2011
1	Hillside, Raynes Park, Village	6.27	16.67
2	Cannon Hill, Lower Morden, West Barnes	5.65	27.27
3	Abbey, Dundonald, Merton Park, Trinity, Wimbledon Park	30.54	35.29
4	Ravensbury, St Helier	10.48	0.00
5	Colliers Wood, Cricket Green, Figges Marsh, Graveney, Lavender Fields	37.46	30.00
6	Longthornton, Pollards Hill	9.60	11.11

Source (all tables): Merton Council

Seventeen Merton Primary Schools have expanded by one form of entry between 2007 and 2011 (plus two schools each offering one 'bulge year'). This has increased provision across the borough by 25%. The rise in the birth figures for this period is 24%. A further two forms of entry are required for 2012/13 and possibly three forms of entry for 2013/14, to meet the relatively small increases in births in 2007/08 and 2008/09.

Households with dependent children as a % of all households	
Ward	% of households
Pollards Hill	40.06
Longthornton	36.28
Cricket Green	36.10
Figge's Marsh	35.67
West Barnes	32.50
Lower Morden	31.86
Wimbledon Park	31.72
Ravensbury	31.26
St Helier	31.04
Graveney	30.88
Lavender Fields	30.78
Cannon Hill	30.27
Merton Park	27.98
Village	27.23
Raynes Park	24.78
Colliers Wood	23.88
Trinity	21.30
Abbey	19.54
Dundonald	19.18
Hillside	16.21

Source: Merton Council Ward data and school places offered

The Council claims that local demand is demonstrated by the small catchment area of Dundonald. However, according to the Council other one form of entry schools have even smaller catchment areas. Compare the sizes of the catchment areas for Bishop Gilpin, Merton Park and Holy Trinity with Pelham and Dundonald as shown in the following map.



NB. The catchment area for Joseph Hood school is not shown and St Mary's RC (in Central Wimbledon) is not included, although other voluntary aided schools are.

This map implies that there are large parts of Wimbledon where there are no school places available for children. This is a misrepresentation of the facts. The catchment area map is also misleading because it excludes siblings, who account for approximately half of the entry for many schools. If siblings were included, the catchment area for Dundonald would increase to over 1km (and there would be similar increases for other schools).