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Regeneration and Planning Development Management London Borough of Camden Town Hall Judd Street London WC1H 8ND

For the attention of: Zenab Haji-Ismail

28 April 2016

Dear Madam, dear Sir,

## Planning Application Consultation - Planning Ref: 2016/1590/P

I am responding to your invitation to comment on the said application submitted for the Abacus School and would ask you to refuse the application for a change of use from police station (sui generis) to school (Use Class D1) including the planned works for the following reasons:

- Principles of development (Need)
- Traffic, Health and Safety
- Heritage

## Principles of Development (Need)

Hampstead already has London's highest density of schools with 37 institutions of which 13 are non-fee paying LA, Voluntary- Aided or Community schools. In the <u>immediate</u> vicinity of the proposed Downshire Hill location already nine schools are located within a distance of one kilometre, 3 of which are within a distance of 500 meters and two within a distance of 100 meters:

 Fitzjohns Primary School (community primary school), 86A Fitzjohn's Ave, Hampstead, London NW3 6NP

- New End Primary School (community primary school), Streatley Place, London NW3 1HU
- Rosary Catholic Primary School (Catholic Church), 238 Haverstock Hill, Hampstead, London NW3 2AE
- Hampstead Hill School (private), St Stephen's Hall, Pond Street / Haverstock Hill, Hampstead, NW3 2PP
- The Academy School (private), 3 Pilgrims Place / Rosslyn Hill London NW3 1NG
- North Bridge House School (private), Senior School, 65 Rosslyn Hill, Hampstead, London, NW3 5UD
- University College School (private), Junior Branch, 11 Holly Hill, Hampstead, London NW3 6QN
- Christ Church Primary School (CoE), Christchurch Hill, Hampstead London, NW3 1JH
- Hampstead Parochial School (CoE), Holly Bush Vale, London NW3 6TX

The applicants have not provided sufficient evidence that there is the local need for a new school of any size in either Hampstead or Belsize, let alone of the proposed size.

Rather, the setting up of a new school of this size in the former police station will create significant additional demand from outside the NW3 area with all the consequences in terms of increased traffic and related Health and Safety issues as outlined below.

## Traffic, Health and Safety

Due to the high-density of schools in NW3 with more than 10,000 pupils and specifically in Hampstead and close to Downshire Hill, the area and Downshire Hill already suffer very significantly from school traffic congestion. Despite efforts to encourage alternative means of transportation, there is clear evidence that cars remain the preferred means of school transport.

The proposed school's location on Downshire Hill / Rosslyn Hill is at the furthest possible location from the school's specifically targeted Belsize catchment area and it is therefore highly likely that 60 to 70 percent of all children will be dropped off and collected by car. Primary school children will be too young to walk or use the bus the extended distance from most parts of the defined catchment area and beyond. Additional traffic will also result from school-related services (deliveries, repairs, waste) as well as the already proposed extended use of the school outside normal school hours, i.e. in the evenings and on weekends.

The impact of the school will be felt not only in the immediate surroundings, but in all main and subsidiary "feeder" roads. This will lead to a further major increase in traffic congestion, parking problems, road safety hazards as well as air pollution.

Downshire Hill, where the proposed school entrance is located, already suffers from congestion during morning and evening peak hours as it connects to major roads, South End Road and Rosslyn Hill, and becomes significantly narrower in the lower half, effectively single lane. Traffic on Downshire Hill results in a significant number of serious accidents every year, including two pedestrian road deaths in recent years.

Parking on Downshire Hill is already very limited and the busy community GP practice, the Keats Group Practice, located immediately across from proposed school entrance and with many elderly and disabled patients will suffer from fewer parking spaces as well as rogue parking behaviour during drop-off and collection times.

Car emission pollution levels - according to recent research by the Hampstead Neighbourhood Forum - are already double the accepted upper emissions limit in the immediate surroundings. These will increase significantly under the proposed school development, putting public health as well as the facades of the many listed heritage buildings even more at risk. Noise pollution due to increased traffic as well as the proposed design is an additional major concern.

## Heritage / Design

In its 2001 "Conservation Area Statement Hampstead" Camden Council specifically recognises Downshire Hills's "... abundance of quality in the buildings with 48 listed houses, mostly from the early 19th century ... including the imposing side elevation of the listed Police Station on Rosslyn Hill" (p. 29). Being in the centre of Hampstead and due to its proximity to Hampstead Heath, the area is enjoyed not only by locals but by a large number of visitors.

I wholeheartedly concur with the assessment by the Heath and Hampstead Society's submitted to Camden Council on 16th April 2016 outlining that the proposed architectural design of the Abacus School is

- out-of-scale and context with neighbouring buildings,
- the selection of material and colours disrespectful of the neighbouring architecture and
- the proposed changes trying to make the building fit for purpose, such as e.g. the rooftop play area, destroy what up to now is an integral part of an organically grown architectural ensemble.

The design (e.g. rooftop playground, air conditioning installations) will contribute to major noise pollution for the neighbouring houses. The building extension including the rooftop playground will also significantly affect the privacy of the immediate neighbours as gardens as well as rooms will be directly overlooked.

I urge the Council to protect a historic part of London for the enjoyment of current and future generations of Londoners and would also ask the Council to actively assess alternative uses for the site and building which are of public benefit as well as address the above concerns. These could include housing for local key workers and medical / health uses.

Yours sincerely,