

Dawson (development), Barry

From: Tom Darwall Smith <Tom@maddoxassociates.co.uk>
Sent: 26 May 2016 20:51
To: Haji-Ismail, Zenab; Minty, Stuart; Powell, Antonia
Cc: David Maddox; Alasdair Buckle
Subject: Fw: 2016/1590/P- Abacus Belsize Primary School - Additional information and response to HCRD objection
Attachments: 114031-P009 - Existing External South East Elevation.pdf; 114031-P504 - Proposed External South East Elevation.pdf; 114031-P700 rev 1 Proposed 3D Visuals.pdf; 114031-P800 - Proposed Internal Corridor Treatment.pdf; 114031-P801 - Proposed Access Diagram.pdf; 160526 HCRD Objection response table.pdf

Dear Zenab

Please find enclosed a response to the HCRD objection dated April 2016. This is divided into five sections which respond to chapters on:

1. the principle of development;
2. highways;
3. heritage;
4. design, and;
5. other comments.

I also enclose the following further information to assist understanding of the application:

- 114031-P009 - Existing External South East Elevation
- 114031-P504 - Proposed External South East Elevation
- 114031-P700 rev 1 - Proposed 3D Visuals
- 114031-P800 - Proposed Internal Corridor Treatment
- 114031-P801 - Proposed Access Diagram

If you have any queries do let me know.

Kind regards

Tom

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Associate Director

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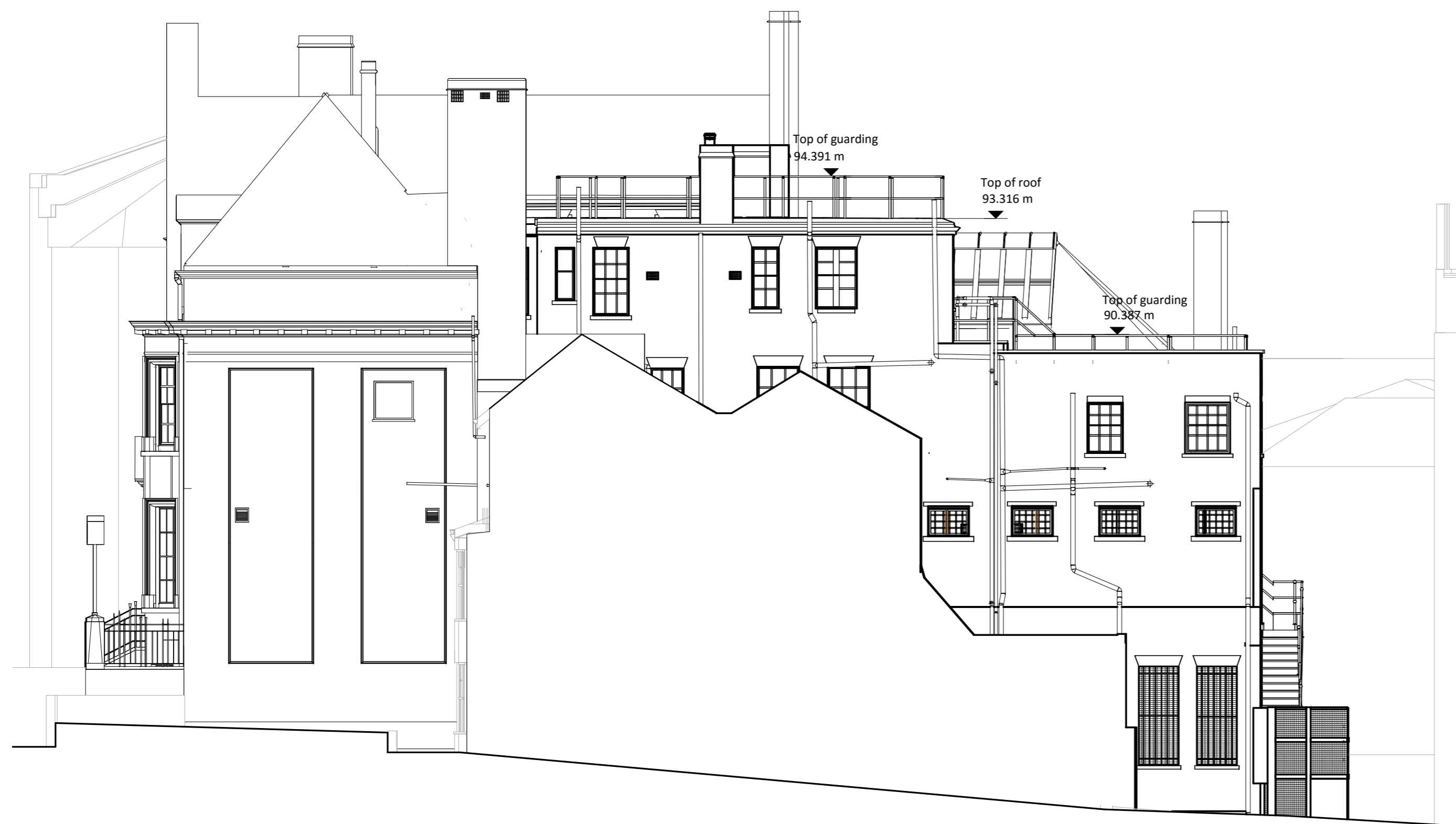
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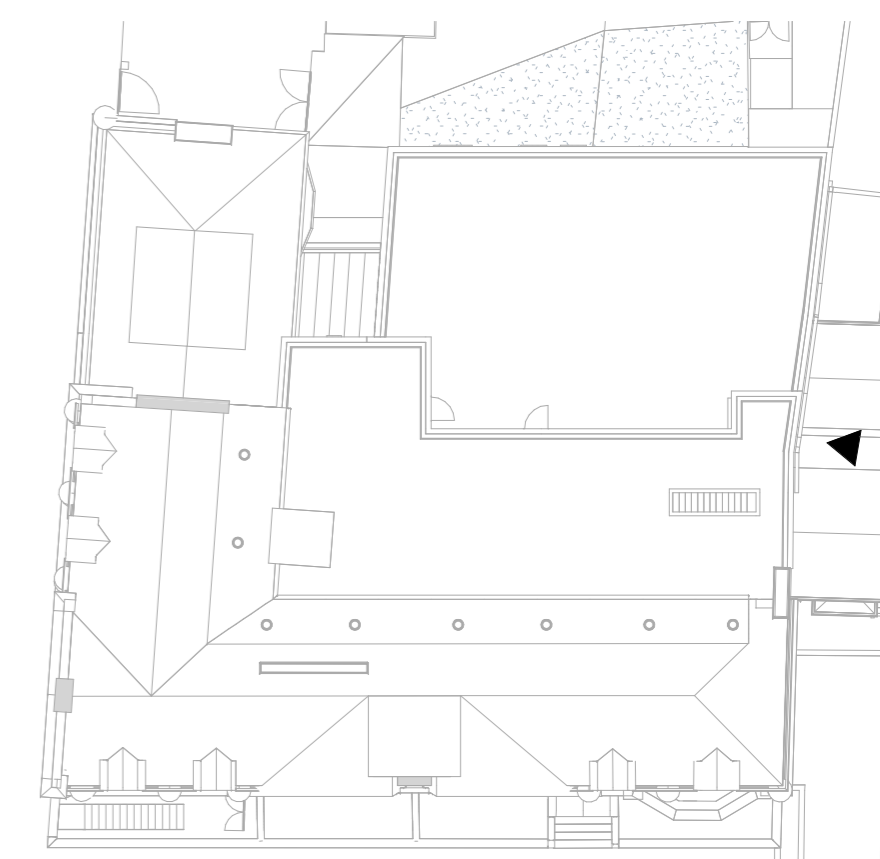
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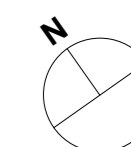
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 CURRENT MODEL REVISION - 1



Existing External South East Elevation - 3
 1 : 100



Key Plan



REV	DATE	BY	NOTE
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Planning

PROJECT NUMBER
 114031

PROJECT
 Abacus Belsize Primary School
 26a Rosslyn Hill, London NW3

DRAWING NAME
 Existing External South East Elevation

DRAWING TYPE
 P - PLANNING

DRAWING NUMBER
 114031 - P009

DATE
 19.05.2016

SCALE
 As indicated

DRAWING SIZE
 A2

DRAWN BY
 AR

CHECK
 RM

REVISION

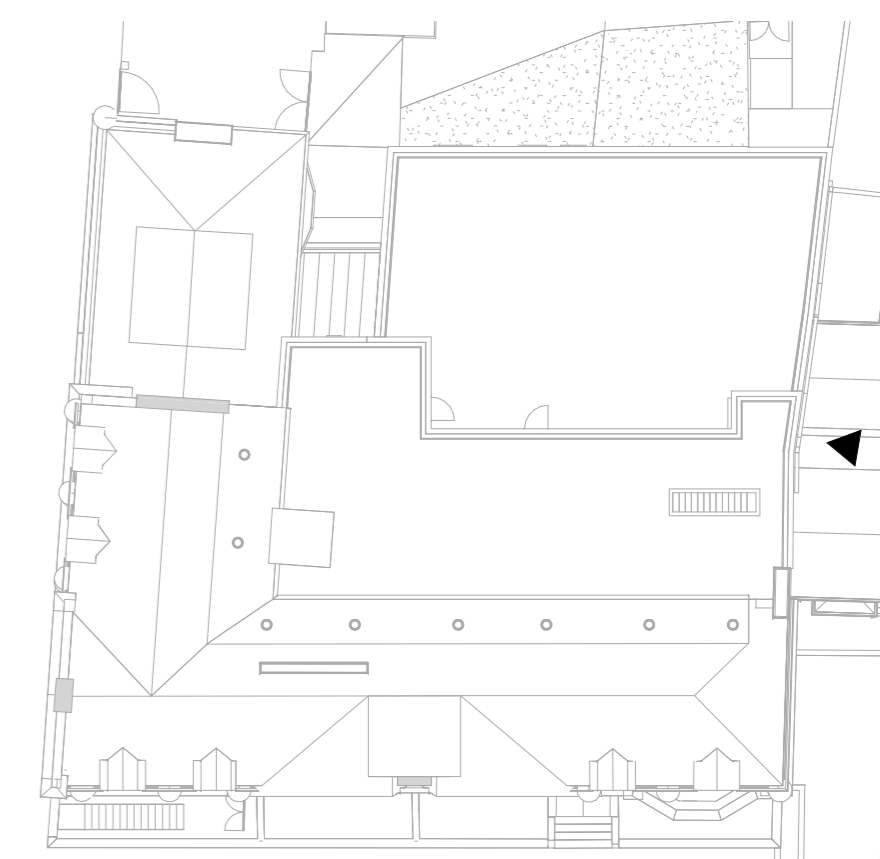
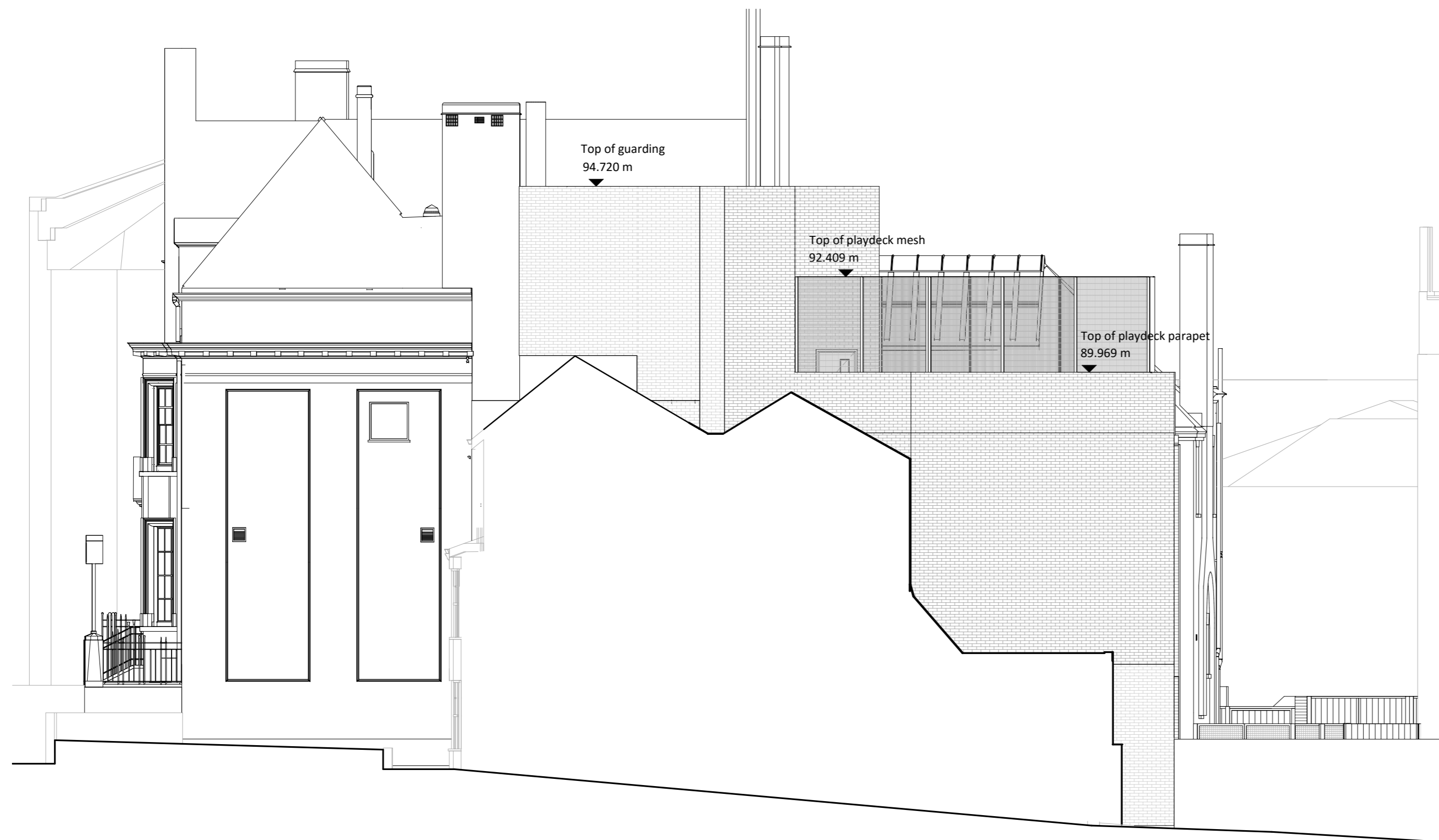


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 CURRENT MODEL REVISION - 1



Key Plan

Proposed External South East Elevation - 3
 1 : 100



Scale 1:100

REV	DATE	BY	NOTE
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Planning

PROJECT NUMBER
 114031

PROJECT
 Abacus Belsize Primary School
 26a Rosslyn Hill, London NW3

DRAWING NAME
 Proposed External South East Elevation

DRAWING TYPE
 P - PLANNING

DRAWING NUMBER
 114031 - P504

DATE
 19.05.2016

SCALE
 As indicated

DRAWING SIZE
 A2

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CURRENT MODEL REVISION: 1



Visual 1.



Visual 2.



Visual 3.



Visual 4.



Visual 7.



Visual 5.



Visual 6.



Key Plan

Rev	Date	By	Note
1	2016-05-19	AR	Revision of Planning drawings
2	2016-03-22	ER	Issued For Planning

Planning

PROJECT NUMBER
114031
PROJECT
Abacus Belsize Primary School
26a Rosslyn Hill, London NW3

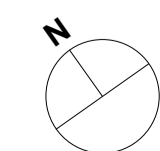
DRAWING NAME
Proposed 3D Visuals

DRAWING NUMBER
114031 - P700

DATE 22.03.2016
SCALE 1 : 300
DRAWING SIZE A1
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Windows which stagger the floor level to the new corridor will be retained at high level for heritage benefits and to provide some borrowed light to the corridor. These staggered windows mark the previous location of the staircase.

Boxing around internal RWP, matched to the existing position of RWPs where possible. The boxing will effectively frame the existing brickwork to enhance it as a feature of the corridor.

Existing windows retained where possible within the exposed brickwork wall.

The existing external wall of the listed building is to be exposed in the corridor of the school, subject to its condition.

Windows which stagger the floor level to the new corridor will be boarded at low level to mitigate the risk or damage to the window. The original window frame and glazing will be retained behind the boarding.

New 150mm skirting to protect the exposed brickwork at low level.



REV	DATE	BY	NOTE
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Planning

PROJECT NUMBER
114031

PROJECT
Abacus Belsize Primary School
26a Rosslyn Hill, London NW3

DRAWING NAME
Proposed Internal Corridor Treatment

DRAWING TYPE
P - PLANNING

DRAWING NUMBER
114031 - P800

DATE 19.05.2016

SCALE

DRAWING SIZE A3

DRAWN BY RM

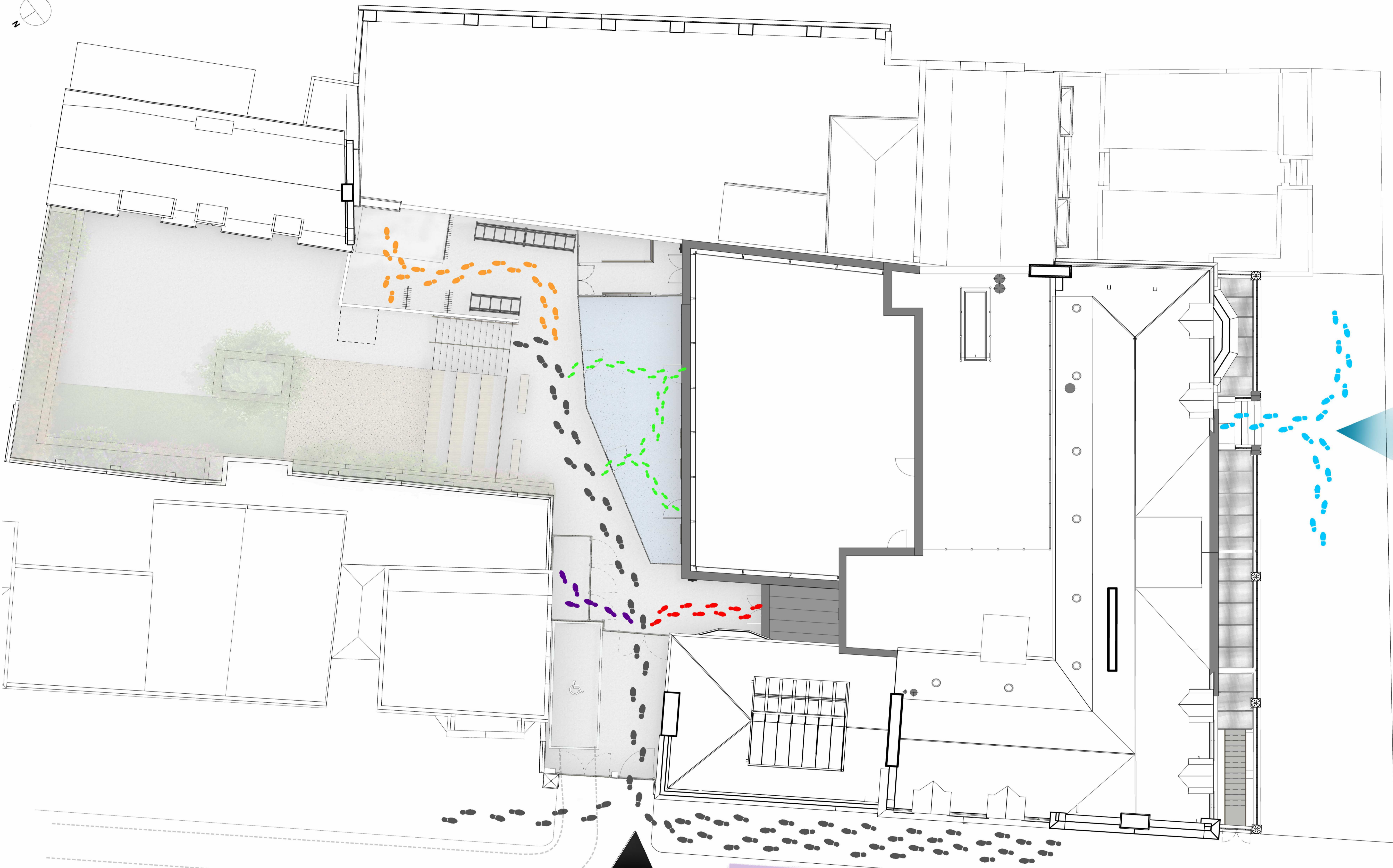
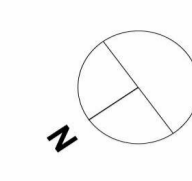
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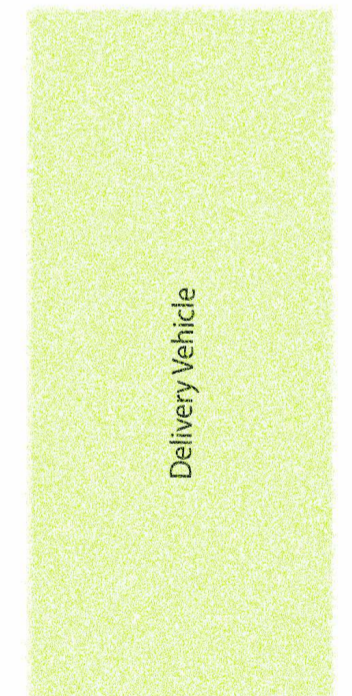


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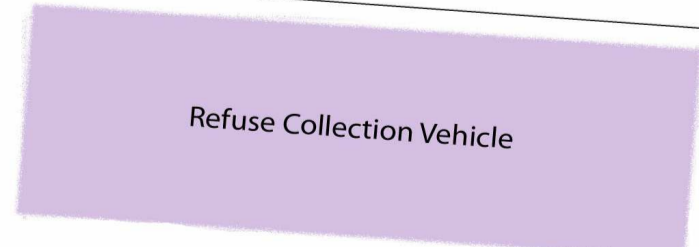
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 CURRENT MODEL REVISION: 1



**ROSSLYN HILL
 ACCESS**



Delivery Vehicle



Refuse Collection Vehicle

**DOWNSHIRE HILL
 ACCESS**

- LEGEND**
- General Access
 - Reception Classroom Access
 - Years 1-4 Access
 - Bike & Scooter Storage Access
 - Visitor & Years 5-6 Access
 - Vehicle Access to Parking Bay
 - Refuse Collection

Proposed Access Diagram

Rev	Date	By	Note
			Planning
PROJECT NUMBER			
114031			
PROJECT			
Abacus Belsize Primary School 26a Rossllyn Hill, London NW3			
DRAWING NAME			
Proposed Access Diagram			
DRAWING NUMBER			
114031 - P801			
DATE			
19.05.2016			
SCALE			
No scale			
DRAWING SIZE			
A1			
DRAWN BY			
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REVISION			



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2016/1590/P Abacus Belsize Primary School
 Applicant response to report dated 29 April 2016 commissioned by Hampstead
 Community for Responsible Development (HCRD)

3.0 The Principle of the Proposed Development and Education Need	
Objection	Response
3.11 The HCRD objects on the basis of no need for a primary school in this location.	<p>The Camden Children, Schools and Families (CSF) does is bound by Guidance to consider basic need for new educational spaces in very specific and narrow terms. This is confirmed in the letter dated 19 May from Peter Dudley, Director of the CSF. We have issued a response dated 26 May to this letter which addresses basic need against the requirement to provide sufficient choice to parents in education provision, as enshrined in the NPPF.</p> <p>Policy 3.18 of the London Plan (titled “Education Facilities”), under point D, states that:</p> <p><i>“proposals for new schools, including free schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations”.</i> [Emphasis added].</p>
Objection	Response
3.12 The current proposal is not a sustainable and appropriate reuse of the former Hampstead Police Station.	<p>The retention of the Site in a singular civic use is an entirely sustainable and appropriate reuse of the former Hampstead Police Station. The Site is easily accessible by sustainable transport, including walking of existing pupils at Abacus Belsize Primary School. The fact that it can accommodate two forms of entry makes it financially sustainable.</p>
Objection	Response
3.13 The planning statement in support of the application states that Core Strategy policy CS1 provides “explicit justification” for a two-form entry school at the site.	<p>Policy CS1 controls the distribution of growth in Camden and promotes appropriate development in “highly accessible” locations under criterion (b). The reuse of a vacant site for a community use in demand is consistent with the approach to growth in Camden.</p> <p>The “explicit justification” for the proposed development is drawn from the standards under “making best use of Camden’s limited land” :</p> <p>d) The proposed development makes full use of the Site proposing two-forms of entry. Measures are proposed in the application which address design, surroundings, sustainability, amenity, heritage, transport accessibility and are detailed in the planning submission and in this response. The proposal accords to this standard;</p>

	<p>e) The proposed development makes efficient use of the Site. For example, intelligent design measures such as the roof-top play deck, a common solution in Camden schools (see St Josephs Primary School ref: 2015/1580/P and South Hampstead High School ref: 2010/5482/P) and careful layout and landscaping to create a high quality indoor and outdoor educational space capable of providing two forms of entry;</p> <p>f) While we expect a modest increase to travel demand at the site, the HCRD estimates of visits each way per day are overinflated and unsubstantiated. The site is located in Public Transport Accessibility Level (PTAL) 4 (good) and adjacent to PTAL 5 (very good). The submitted Transport Assessment and School Travel Plan are in accordance with policy.</p> <p>g) it is not meaningful to try to apply density figures to school development in the same manner as those for residential development due to the nature and configuration of internal spaces. However, the site is well connected, being located in PTAL 4. Existing and pupils are expected to use public transport or walk to the site;</p> <p>h) the proposal is mixed use educational and community use, managed through hours of use.</p> <p>For the reasons above, the proposal is supported by CS1.</p>
Objection	Response
3.14 The justification for the proposal is based on demand , not need .	The HCRD response fails to identify demand (which is met by providing sufficient choice in educational provision) as a key and distinct factor in the application of the planning system. The same approach is taken by the Camden CSF in their letter dated 19 May and we direct the reader to our response letter dated 26 May. Whilst the CSF considers the proposed school does not meet basic need in the area, there is clearly a demand , which must be met by providing sufficient choice in education provision, in accordance with Paragraph 72 of the NPPF.
Objection	Response
3.15 The planning statement makes a broad statement for a strategic need for school places based on London-wide growth projections, but does not equate this at the local level.	The planning application statement acknowledges that LB Camden does not recognise a need for primary places in this part of the borough. All boroughs will need to meet population growth, and for inner London boroughs like LB Camden that will involve redevelopment which increases housing density in all parts of the Borough, including Belsize and Hampstead. New ONS statistics predict that Camden will be the fourth fastest growing Local Authority area over the next ten years with an estimated 17.3% population growth (see table 3 at http://bit.ly/1TlSENk).
Objection	Response
3.16 The 2015 Camden Infrastructure Study	The planning application is based on providing

Update demonstrates that there is no significant and over-riding need for additional provision of primary school places at a level to warrant the proposals.	parents with sufficient choice . The application cites the overwhelming demand (as met by choice) for a secular school serving Belsize, which is consistent with Paragraph 72 of the NPPF.
Objection	Response
3.17 The Study states that Abacus Belsize Primary School is one form of entry, and that need will be met through Kingsgate and Kings Cross Academy schools, with future demand in the Euston area.	The school is currently one-form of entry. The other two schools identified in the report are located some distance from the site (2.2km and 3.6km respectively) and are less accessible to children from the Belsize area. This does not satisfy the requirement for sufficient choice in paragraph 72 of the NPPF for secular non-fee paying primary school places in Belsize.
Objection	Response
3.18 There are 55 schools in NW3, providing for around 12,500 pupils. Current policy presumption is in response to the traffic and environmental consequences of that high level of concentration.	These figures are unsubstantiated and so we comment on the facts. The facts are that Camden has 43 primary schools across the Borough. In terms of transport impact, Abacus school has a proven track record of over 90% of children arriving by sustainable transport methods when it was located in the WAC Arts Centre (close to the application site). HCRD does not show any evidence of “demonstrable negative local impacts” in accordance with Policy 3.18 of the London Plan, making unsubstantiated assertions about travel impact. The transport assessment and proposed School Travel Plan demonstrate how the school can manage travel.
Objection	Response
3.19 Hampstead has no educational need for primary school places at the level proposed by the applicant. Belsize has a need for secular places. The proposed school does not lie in the catchment area and does not meet its own stated requirements for 210 places within walking distance of the catchment area.	Please see the response to the objections at paragraphs 3.14 and 3.15, which cover the objections at 3.19.
Objection	Response
3.20-3.21 The catchment area has expanded to cover parts of Hampstead Town, Fitzjohns and Frognall, Gospel Oak and Haverstock Wards. The Swiss Cottage part of the catchment area should revert to Swiss Cottage.	The existing catchment area of the school centres on the Belsize Ward. It reflects a combination of factors that cannot simply be matched to Ward boundaries, including providing sufficient choice to parents for a non-fee paying secular primary school and the location of other schools, and there is a small amount of overlap. The school is liaising with the CSF Department in changing its admissions policy to align with that used in Camden i.e. based on distance from the school. The school will issue a consultation in autumn 2016 to use two geographical points, St Peter’s Church in Belsize and the proposed school site, and to take a proportion of pupils from each in order to give parents sufficient choice in education provision locally.
Objection	Response
3.22 Camden’s primary school provision is in surplus and will exceed population projections in the future.	There is enough capacity in schools in the borough at a basic level which responds to basic need . However, out of a total 1,837 places available in Camden Schools in 2015 (ref: Starting School in Camden (2016)), 714 (39%) are places in

	<p>faith schools (Voluntary Aided CofE or RC). Parents who seek a secular education in Camden are not accounted for in parents' admissions choices. All places are treated the same by the CSF.</p> <p>The proposed school responds to providing sufficient choice to parents in accordance with Paragraph 72 of the NPPF.</p>
Objection	Response
3.23 The planning statement makes broad assertions about the growth of Camden in the future. Once large Camden development sites are developed, Camden will have limited capacity for future growth.	The requirements of a growing London are clear and technological advances in construction means that there will continue to be scope for additional residential development in Belsize and Hampstead that incrementally pushed up density.
Objection	Response
3.24 The applicant suggests that demand is shown through 171 applications for 30 places in the next academic year. The does not translate in to need . No evidence is provided to show where pupils would have been given places should Abacus not exist, nor the location of prospective pupils.	As with previous paragraphs, the HCRD objection does not recognise that demand is a separate measurement to need , and one that must be met through the planning system, in accordance with Paragraph 72 of the NPPF.
Objection	Response
3.25-6 The CEO of the CfBT Schools Trust (Chris Tweedale) did not support moving to the site in January 2015. This is detailed in a letter in Appendix 1 to the response.	This letter has been taken out of context. It responds to parents on the prospect of using the proposed site to deliver education at the same time as building operations are being finalised. This has been experienced by the CfBT elsewhere and is undesirable at the current site due to the potential for disturbance. We enclose an amended statement to this submission from Chris Tweedale which clarifies the position here.
Objection	Response
3.27 (Summary)- Bullet 1. The applicants have failed to distinguish between need and demand .	Please see the response to paragraph 3.14. A clear distinction of need Vs demand is identified throughout the planning submission. Meeting basic need provides one place for one child. The HCRD response appears not to address the national planning requirement on providing sufficient choice (which meets demand), as set out in Paragraph 72 of the NPPF.
Objection	Response
3.27- Bullet 2. Camden's policy suggests growth in facilities should be focussed in specific growth areas and identified accessible locations, with more limited change outside of these areas, including the site of the proposed school;	The key term used in Policy CS1 is " <i>accessible locations</i> ", which supports appropriate development at the application site. The site is located in Public Transport Accessibility Level (PTAL) 4 (good) and adjacent to PTAL 5 (very good). There are numerous bus routes which go within 400m the site.
	The proposals are an opportunity to bring a vacant building back in to use and to provide parents with sufficient choice for secular non-fee paying primary school places in the area.
Objection	Response
3.27- Bullet 3. Research commissioned by the local authority in 2015 demonstrates that there is no significant and over-riding need for additional provision of primary school places at a level to warrant the proposals;	The applicant acknowledges the difference between need and choice as distinct. The Camden 2015 report responds only to basic need (one place for one child). This application responds to providing sufficient choice as per the NPPF.
Objection	Response
3.27- Bullet 4. The Applicant has failed to	The applicant acknowledges the difference

demonstrate a clear and underlying need for the proposals. The case is instead based upon a generic and strategic assessment of 'demand', rather than a detailed assessment of actual need at the local level'	between need and choice as distinct. The Camden CSF Department responds only to basic need . This application responds to providing sufficient choice in accordance with the NPPF.
Objection	Response
3.27- Bullet 5. There is significant concern as to the extent at the catchment area and the fact that this appears to have been engineered to facilitate the supported identified demand for the proposal.	The school was formed to provide parents with sufficient choice for secular non-fee paying primary school places. The existing catchment area responds to demand, in an approach consistent with Paragraph 72 of the NPPF. The admissions criteria will be subject to consultation during autumn 2016 to agree any changes.
Objection	Response
3.27- Bullet 6. The scheme should be based upon a robust demonstration and evidence of need at the local level, and not just a general assertion based upon London-wide forecasts;	The proposal is based on providing sufficient choice to parents. The London-wide population growth forecasts included in the planning statement add context to the proposals, to show how the Council may embody the principles of sustainable development by future-proofing capacity at schools in anticipation of population growth. New ONS statistics predict that Camden will be the fourth fastest growing Local Authority area over the next ten years with an estimated 17.3% population growth (see table 3 at http://bit.ly/1TLSENk).
Objection	Response
3.27- Bullet 7. The proposed use of the site in this manner assumed from the outset that a number of policies would be overridden. This choice of site had previously been rejected by Abacus as completely unsuitable for their needs. It should have been apparent at the outset that transferring this asset to satisfy Abacus' limited requirements centred on Belsize Ward was completely inappropriate.	The HCRD response does not provide any details of the policies which they believe are overridden in this proposal. The application has, in fact, been carefully prepared to accord with local planning policy (where it is up to date), the London Plan, National Guidance and other material considerations, as detailed in the submission. The rejection of this site referred to is taken out of context (as clarified above in response to para 3.25-6) in the letter by Chris Tweedale in January 2015. The original letter responds to parents on the prospect of using the proposed site to deliver education at the same time as building operations are being finalised. This has been experienced by the CfBT elsewhere and is undesirable at the current site due to the potential for disturbance. The determination of this application must be on the merits of the proposed scheme. We assert that this is a vital community use, which provides parents with sufficient choice in education provision and meets an identified demand . Whilst the site is just outside of the existing catchment area, it is the only viable site found for the school after an extensive search of over two years.

4.0 Transportation	
Objection	Response
4.13 "Transport assessment" a)- Bullet 1. The census modal splits stated in the Transport Assessment (paragraph 3.4) are misleading as they include unemployed people, and they should be focused on Hampstead Ward, not Belsize Ward. The figures would be different in this case.	The modal split includes people not in employment because it looks to assess traffic numbers 'on the road' rather than discounting specific groups. If ignored, this could be construed that the Report is manipulating base data. The existing catchment area focuses on Belsize Ward.
Objection	Response
4.13 a)- Bullet 2. The data relating to traffic flow counts at Downshire/Rosslyn Hill junctions is not shown in the transport assessment.	This information has been submitted to L.B. of Camden.
Objection	Response
4.13 a)- Bullet 3. Road traffic accident data detailed in the transport assessment is not analysed.	The Report states that the accident data has been reviewed/analysed as part of the Safety Audit.
Objection	Response
4.13 a)- Bullet 4. Parking stress data in the transport assessment does not include weekday evenings, which should also be considered.	The parking stress surveys relate to the use of the building as a school. A basic principle of the School's founding philosophy is that it is a facility for the immediate local community and as such any evening use would not expect to seek support from those traveling distances that required travel modes involving private cars. The local knowledge of the parking constraints throughout the area currently informs peoples travel choices and would do so in the future.
Objection	Response
4.13 a)- Bullet 5. The transport assessment is based on three flawed assumptions: 1) that school children will all be admitted from within the catchment area; 2) that children walk/cycle to school at the pace shown, and are willing to walk for over ten minutes; and, 3) the admissions policy prevents admission from outside of the catchment area.	Issues of the catchment area, willingness to walk/scoot/cycle and admissions policy chooses to ignore current parent/school performance over 3 full years and argues that since it is their belief a proportion of parents will use their cars they then derive a growth in this use as numbers increase. This view ignores the fact that Abacus is an existing school with no legacy of any parents using their cars on a regular basis. It has been the School's founding policy to be car free and as with increased sustainable travel choices happening throughout urban city regions, the decline of car ownership and private car travel is widely accepted.
Objection	Response
4.13 b)- Bullet 1. No swept path analysis for refuse vehicle access has taken place to accommodate such large vehicles.	The servicing of the site has been discussed with Camden who agrees that as with the current practice in Downshire Hill the collection/delivered can wait at the entrance on the basis of pauses/load/proceed.
Objection	Response
4.13 b)- Bullet 2. An insufficient amount of research has taken place to assess the suitability of the mooted relocation of the pedestrian crossing to the Rosslyn/Downshire Hill junction.	The pedestrian crossing exists in an almost identical relationship to the junction as is suggested under the recommendation to relocate it to the south of the junction. The additional junction data shows the impact remains as it is currently.
Objection	Response
4.13 c). The Transport Assessment should have included the TRICS data used, in line with best practice.	This information has been submitted to L.B. of Camden.
Objection	Response

4.13 d)- Bullet 1. Parking stress on Downshire Hill will not be able to cope with parents using spaces to drop children off.	This comment is based on the same opinion of those who commissioned the report, that because existing schools in Hampstead suffer from parents using their cars for their children's school journey, they do not believe that Abacus will continue to deliver their excellent record on car free travel to school.
Objection	Response
4.13 d)- Bullet 2. There may be potential safety conflicts around the school entrance if a parent/visitor is trying to use the disabled parking space during peak hours, as it is obscured from the road and pedestrians may be in the way.	Access to the disabled parking bay will be managed as and when required by the school. The school fully recognises the need to manage its transport affairs at all times.
Objection	Response
4.14 "Travel Plan"- Bullet 1. Staff/pupil modal split targets are not completed in the Travel Plan. These should be completed, using a clear TRICS methodology.	Travel Plan will be published with more detailed information which accords with L.B. of Camden guidance. This will support the relevant anticipated planning condition.
Objection	Response
4.14- Bullet 2. The Travel Plan runs to 2017, where it should run for longer (at least five years).	The Travel Plan is generic to the current proposals for Abacus at this time and as with any such proposals, it is expected that L.B. of Camden will seek the specific details nearer to the time of the occupancy for their approval by their Travel Plan Co-ordinator. The plan is structured in accordance with Camden Travel Plan Guidance template. It is expected that the detailed Travel Plan will run for a minimum of five years.
Objection	Response
4.14- Bullet 3 The monitoring strategy has not been completed and should be site specific.	The monitoring strategy will be in accordance with L.B. Camden Travel Plan guidance; Baseline travel survey – Sept 2017 Year 1 travel survey - Sept 2018 with the reporting of results and review with L.B. of Camden within the following 3 months. Years 3 and 5 follow the same process in 2020 and 2022 respectively.
Objection	Response
4.14- Bullet 4. The Travel Plan needs more specific targets, actions and a monitoring strategy to be compliant with Camden Guidance on Travel Plans.	More specific targets will be determined when the detailed Travel Plan is published which will accord with L.B. of Camden guidance.
Objection	Response
4.14- Bullet 5. The Travel Plan says no pupils currently require SEN transport and states this would be addressed as need arises. This should be proactively planned for given a 420 pupil capacity.	Travel Plan will be published with more detailed information which accords with L.B. of Camden guidance. This will support the relevant anticipated planning condition.
Objection	Response
4.15- As the applicant puts a lot of reliance on the Travel Plan, it should be fully completed and substantially more detailed.	Travel Plan will be published with more detailed information which accords with L.B. of Camden guidance. This will support the relevant anticipated planning condition.
Objection	Response
4.16 "Additional technical analysis" a). The proposal is identified as "car-free", and the Transport Assessment says "all pupils" will be within a 20 minute walk of the site. This uses straight line distances, which is a questionable approach. Approximate 10-15% catchment area is over 20 minutes away when this is calculated by street. Figure 3.1 of the Transport Assessment	This presumes against the likelihood that those attending the school will choose to use sustainable travel modes, choosing instead to use their cars. These comments do not have the benefit of being familiar with Abacus School and its parents. Pupils arguably further than a 20-minute walk are located along sustainable transport corridors and pupils currently travel by

misrepresents the walking distances. Although the area outside of 20 minutes away is served by the number C11 bus, there is no guarantee that parents will not choose to drive.	these means.
Objection	Response
4.17 b) 54% of pupils are located within the catchment area and 46% outside. The admissions policy cannot prevent pupils from outside joining. Analysis shows 22% of pupils may arrive by car, which will increase parking stress by 293%. If this rises to 30%, parking stress will increase by 370%.	This reflects the existing situation with 90 pupils which is based on the first year of the school operation taking founding pupils from a wide area, the subsequent second and third year intakes were based on a much more focussed catchment closer to the school. This will become more so with the catchment as the school expands into the 420 pupil capacity. Therefore, the subsequent derived potential car journey calculations are a flawed approach. The existing founding year of pupils are located along sustainable transport corridors and currently travel by these means.
Objection	Response
4.18 (summary)- Bullet 1. The assumption that no vehicle trips will be made to the school is very optimistic. Neither the current distribution of pupils nor the stated future admissions policy support this assumption;	It has been the School's founding policy to be car free and the performance over 3 full years of their current Travel Plan supports this. Abacus is an existing school with no legacy of any parents using their cars on a regular basis.
Objection	Response
4.18- Bullet 2. The recorded parking stress for available on-street spaces is already at 74% stress level and the additional of 11 vehicular trips, which means only 3% of pupils being driven to and from school would result in 100%. This has significant implications for both the safety of students travelling and the amenity of local residents and other visitors;	These calculations are based on the premise that the school not be operating a car free Travel Plan.
Objection	Response
4.18- Bullet 3. Development Policy 16.15 from Camden Local Development Framework (2010) states that application for new schools will be expected to provide details of the projected growth in pupils and how they are likely to travel as well as their impact on the transport system. Further analysis should be taken to establish the potential implications of the development on the local highway network;	The growth in pupil numbers at the school is published i.e. first year of operation at the proposed site 120 rising to 420 by 2024. Methods of travel are already established from the existing school Travel Plan which develop as necessary during the expansion in pupil numbers.

5.0 Heritage	
Objection	Response
5.12- Bullet 2. The scheme proposes the loss of almost all of the interior of the Listed Building and the demolition of its contemporary rear cell wing. This equates to a substantial loss of historic fabric, the impact of which on the significance of the Listed Building has not been adequately justified. The proposed losses include the most significant surviving interior of the building (the magistrate's court), the police cells and two principal staircases;	The Heritage Statement has assessed the relative significance of the different parts of the building, concluding that the most important elements are the grand façades and slate roof, whilst the rear wing is less significant as well as having been heavily and detrimentally altered. The former police cells have been comprehensively altered and are not historic in their current form. The Heritage Statement explains how there would be some harm caused by the development, but also that there would be public benefits outweighing that harm. Pre-Application discussions with Camden officers established that these benefits offered good arguments to justify the loss of the rear wing and the interior works.
Objection	Response
5.12- Bullet 3. The scheme proposes the replacement of the rear cell wing with a much larger new wing. No certainty is given over whether the rear wall will be retained.	The existing rear wing is of reduced value due to its utilitarian nature, history of extensive alteration, and the unsightly brick and metal additions to the exterior. The new rear wing would be wider than the existing one, but of a similar height, and its exterior character would be much more coherent. The rear wall of the Rosslyn Hill block will be retained in the new scheme, and will be restored to act as a main feature within the circulation space.
Objection	Response
5.12- Bullet 5. The proposal does not meet the statutory requirements of Section 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the requirements of the NPPF (particularly paragraphs 126, 131, 132 and 133) or the provisions of relevant local policy relating to heritage and good design;	The 1990 Act requires the Local Authority to have "special regard" / pay "special attention" to the desirability of preserving the significance of listed buildings and conservation areas. The NPPF echoes this but also notes that there are other dimensions to sustainable development, including "supporting strong, vibrant and healthy communities" (paragraph 7). The NPPF further notes in paragraph 72 that "The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: give great weight to the need to create, expand or alter schools...". In light of this the scheme would meet the requirements of section 12 of the NPPF by creating an appropriate new use for the building which delivers considerable public benefits that would outweigh the less than substantial harm to heritage.
Objection	Response
5.12- Bullet 6. The proposals are contrary to Policies 7.4, 7.6 and 7.8 of the London Plan (March 2015, incorporating Further Alterations): Policy CS14 of the Camden Core Strategy (2010 – 2025); and Policies DP24 (a), (b) and (c) and DP25 (b), (f) and (g) of the Camden Development	The Heritage Statement explains in some detail how the scheme relates well to the conservation area through its massing, materials and design, and how it secures the beneficial reuse of the listed building. It therefore meets the requirements of the London Plan and Camden's

Policies document.	local policies. This is of course in the overarching context of delivering public benefits that outweigh any harm to heritage, as required by the NPPF.
Objection	Response
5.12- Bullet 7. Policy DP25 states that the Council will only permit development within conservation areas that preserves and enhances the character and appearance of the area; will only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interested of the building; and will not permit development that it considers would cause harm to the setting of a listed building	The Heritage Statement explains how the development will enhance the setting of the listed building, and the contribution the site makes to the conservation area, through the use of appropriate materials, the replacement of the untidy rear wing with a new design of restrained but good character, and the improvement of the site's hard landscaping. The change of use would enhance the site's communal value by returning the disused public building to life as a vibrant part of the community.
Objection	Response
5.13 i)- Bullet 1. Details of renovation works to the elevation are vague;	The refurbishment would include like-for-like repairs as necessary, to fully restore the highly significant main exteriors. The precise details would be finalised as work unfolds and the conservation needs become clear. The approach to repairs and renovations would be agreed with LB Camden and could be made subject to a condition attached to the Listed Building Consent.
Objection	Response
5.13 i)- Bullet 2. Mesh over the basement play areas on the front elevation is likely to be unsightly, especially if fixed at a higher level;	The mesh would be fixed beneath the Portland stone coping, and would not be visible in normal views of the building. The design comprises fabric mesh (similar to bird netting) strung between steel hooks.
Objection	Response
5.13 i)- Bullet 3. The need to use front light-wells in addition to the play deck and external space suggests over development of the site;	The front light wells are proposed to be utilised as a way of putting them to productive use and enhancing the facilities within the basement classrooms. They are an addition to the school's classroom provision rather than a key part of it. They would create a point of interest for nearby pedestrians that would signify the school use without detriment to the public character of the building. They would also provide a much-improved appearance compared to the present character of the lightwells.
Objection	Response
5.13 i)- Bullets 4,5,6. Demolition of the existing rear wing is problematic. The submission suggests this to be a more recent addition, but this is questionable as it shown on historic maps and plans and is likely therefore to form part of the original design. The utilitarian design is an architectural expression, and doesn't necessarily show the age of the building. Despite significant alteration it is contemporary to the original construction and demolition requires careful justification.	There have been suggestions that the rear wing was added slightly later, or added at a late stage to the design, due to its flat roof and the change of internal detailing at the junction with the front block. However it may well be an original part of the building and is shown on the earliest surviving plans. The Heritage Statement makes the conservative assumption that it may be original and has assessed its significance on that basis. The rear wing has been much altered internally and externally, and has lost its original cells which would have formed the main point of historical interest. The significance of the rear wing is much reduced by these changes, and its contribution to

	the special interest of the listed building is correspondingly reduced. It is one of the parts of the site that is most able to accommodate suitable change, in the context of a good quality design and a scheme that delivers overall public benefits that outweigh the less than substantial harm caused.
Objection	Response
5.13 i)- Bullet 7. The mass and extent of the rear extension and the resultant concealment of the rear elevation of the building is unfortunate and its extent is questionable.	The massing of the proposed rear wing has been developed in consultation with Camden officers, and represents the most suitable compromise between height and width. The rear elevation of the main police station block is presently largely concealed by the ugly metal bridge structure, whereas the proposals would bring it to much more prominence as a key feature within the main circulation space of the new school. The rear elevation of the court room block would remain visible to the side of the new wing. Both these rear elevations are plain and do not make an architectural statement as such, whilst the oriel window at the east end would remain fully visible.
Objection	Response
5.13 i)- Bullets 9/10/11 The removal of grilles and walkways is a benefit, but does not justify the proposed new build alone. The new build would have a significant impact on the Listed Building. It is visually dominant.	The benefits referred to are localised, whereas the scheme should be judged on the overall public benefits which would accrue. These relate not just to localised improvements but to the wider public benefits of enabling the school use and providing a sustainable, committed long-term user of the site that will enhance its communal value as a public building and refurbish the key public elevations.
Objection	Response
5.13 ii)- Bullet 12. The scale and form of development appears to have been dictated by the requirement of the use (and the number of pupil spaces required) rather than heritage led;	The scheme has been developed so as to provide the required accommodation in a way that ensures the retention of the most significant aspects of the listed building (i.e. the main facades and roof) whilst making full use of the less significant interiors, and locating the more challenging spaces such as the assembly hall and kitchens within the new build. The layout and massing have been informed by the initial heritage assessment and subsequently by engagement with Camden officers, which has led to the reduction in height of the rear wing in concert with the reuse of every part of the main police station and court blocks.
Objection	Response
5.13 ii)- Bullet 1. The proposal comprises the effective gutting of the existing interiors of the listed building, including removal of the spine, wall, significant destruction of the original plan form and including the removal of internal dividing walls.	The existing interiors are in general extremely bare and most have been much altered. They do not possess any notable design value that might for instance derive from a rational 'Spartan' aesthetic, and in their reduced state are generally of the most modest value. There are areas of greater significance including the main staircases and the court room, and where such areas are to

	be remodelled the harm to significance is more than offset by the considerable benefits of the scheme. What is more, the design process aimed to minimise any interventions, and demonstrated that the proposed changes are no more than necessary to provide the benefits of the school use.
Objection	Response
5.13 ii)- Bullet 2. The modest character of the interior is deemed to make it of lesser interest. The fact that the principal courtroom wing staircase is judged of 'low significance' is questionable.	As noted above the vast majority of the interiors are of little or no intrinsic interest, as original architect's focus was on providing impressive public facades. There are several staircases of significance, and where these are proposed to be removed their loss is justified by the necessity of doing so to enable the wider public benefits of the scheme. The significance of the main stair to the court room has been detrimentally affected by the loss of the top section of its balustrade, the installation of a later upper flight of non-matching stairs, and considerable changes to its setting on the ground floor - hence its grading of 'low significance' in contrast to the higher grading of the similar but less altered 'magistrate's stair' (which is being retained by the scheme).
Objection	Response
5.13 ii)- Bullets 4/5. The proposals include the loss of two staircases. No justification is given for the removal of two staircases other than that they are 'low significance' and in the case of the main station stair – does not meet modern safety requirements.	The staircases are required to be removed as part of the scheme in order to enable the school use. Their loss would be acceptable in the context of the scheme's public benefits, and given that it would not be possible to retain them and provide a workable scheme. During the design development process various iterations were tried, to test the retention of the staircases with different layouts, but these did not work as they generally led to the redundancy of the adjacent spaces and the stairs themselves, whilst causing additional space to be added within the new build. In discussions with Camden officers it was felt that - in view of the significance of the elements affected - it was preferable to remove the stairs than to leave the building underused.
Objection	Response
5.13 ii)- Bullet 6. The scheme includes significant alterations to the magistrates court room.	The court room has been altered in the past through the rearrangement of furniture and fittings, the introduction of the 'viewing gallery', etc. It no longer represents an original Edwardian court room. Meanwhile its furniture and fittings, whilst of fair appearance, are not of the highest quality and are not notable examples of their type. The room is redundant as a court room and is not capable of any other use unless the interior elements are considerably altered or removed - as has happened in various redundant courtrooms of better quality in listed buildings over recent years. The proposed changes would cause some harm to the listed building's significance overall, though this would be mitigated to a degree by the programme of

	building recording that would form part of the Listed Building Consent. More importantly, however, the wider public benefits of the scheme would greatly outweigh the loss of the court room in its present form.
Objection	Response
5.13 ii)- Bullet 7/8/9. Normally key features such as spine walls and staircases would be retained in a refurbishment, and this should have been the assumed position from the start of the scheme. The proposals attempt to remove important features through stating that they are of low significance and cannot be converted. With a more careful design, these could have been retained.	See response to 5.13 iii) - Bullets 4/5 above. It is worth reiterating that a 'more careful' design would not be possible without creating spaces redundant for school use, or leaving staircases within the building that could not be used by the occupants.
Objection	Response
5.13 iii)- The stated benefits of the scheme (retention of the courtroom, magistrates stair and stable block; removal of unsightly add-ons; landscaping; and, return of the neighbouring house to residential use) are "extremely limited" and do not outweigh the "substantial harm" caused by other proposed works.	The scheme would not cause 'substantial harm' to the significance of the listed building. The most important parts (the main facades and roof) would be retained intact and indeed enhanced as part of the works. The changes to the building are considerable but have been directed at those areas of lower value which are more able to accommodate them without unacceptable impacts on the overall significance of the building as a whole. It is instructive that whilst Historic England view the loss of the police station staircase as causing a degree of harm, they do not feel that this would amount to 'substantial harm', and furthermore they do not mention any other losses as having a similar potential impact. Meanwhile the public benefits of the scheme are much more than just the localised heritage and design benefits, and include the sustainable reuse of the public building as a school for the local community, which carries great weight.
Objection	Response
5.13 iv) Bullets 1/2/7- The proposals will result in an unacceptable impact on the Conservation Area, through the new build dominating the views in to the site from Downshire Hill and from the south east on Rosslyn Hill.	The new build rear extension would not protrude beyond the existing flank wall of the court block along Downshire Hill, and thus would allow the views of the rear yard, and trees and sky beyond, to remain. The new building would be of a much more attractive character than the present rear wing, enhancing this view. Meanwhile from Rosslyn Hill the main part of the rear extension would be of a similar height to the existing rear wing, whilst the playdeck fencing above would be coloured to harmonise with the sky and have a recessive visual character that compares well with the black railings on the present rear wing's roof. The taller element at the junction of the old and new blocks would be slightly taller than the existing rooftop railings, but this structure would sit below the front block's roofline, would have a modest architectural character, and would also be heavily screened by the tree in front.
Objection	Response
5.13 iv) Bullets 3/4/5. The use of yellow bricks,	The 'yellow' bricks to be used are stocks which

<p>proposed massing and resulting screening of roof top features by the proposed extension will result in an unacceptable impact on the Conservation Area.</p>	<p>would have a variegated colour and texture, to closely match the prevailing use of London stock bricks on the rear elevations of other buildings within the conservation area. They would consequently be entirely appropriate for this backland location. The screening effect of the new extension on the rooftop features of the retained blocks would not be considerably different from the effect of the present rear wing, which is unsightly with numerous uncoordinated sets of black railings and riser pipes, as well as the metal-clad shaft and high-level bridge which obscures views of the roofscape from ground level within the rear yard. The conservation area would be largely unaffected by the proposals as they would not be prominent in any public views.</p>
<p>Objection</p>	<p>Response</p>
<p>5.13 iv) Bullet 6. The proposed main entrance on Downshire Hill will result in an unacceptable impact on the Conservation Area and the setting of Listed Buildings on Rosslyn Hill.</p>	<p>The Downshire Hill entrance will be enhanced by the proposed scheme, through the installation of good quality gates and improvements to hard landscaping.</p>

6.0 Design	
Objection	Response
6.9 The site was originally deemed unsuitable for 210 pupils.	The early design stages included a full feasibility study. At no point was the converted site deemed unsuitable for a school. The existing building provides good opportunities for educational spaces with good natural light to most areas as well as multiple opportunities for different types of learning environments inside and out.
Objection	Response
6.10 The requirement to provide educational space for 420 pupils would put “excessive demands” on the site, resulting in a cramped layout and poor educational facilities.	The site is able to provide all the key amenities and education environments required for a 420 pupil school to an acceptable standard. The site is acceptable for an urban setting with close access to additional amenities to improve the learning experiences of the pupils.
Objection	Response
6.11 The proposals should have been formulated in accordance with CABE guidance.	CABE guidance is no longer a stipulated requirement in school design and is not considered as current with the guidance, briefs and budgets of today’s educational projects. The proposals were formulated with the spirit of the CABE guidance but also with direct reference to current Building Bulletins, Building Regulations and the detailed brief and requirements of the EFA and School itself.
Objection	Response
6.12 The design is said to have been formed over a number of months, however it appears to show little regard to the Listed Building.	The design of the new school is heritage-led with input from Heritage officers and advisers and therefore shows great respect for the listed building and context. The historic interior has been suffered interventions which have eroded most of the significance, apart from the court room, stair cases and other limited areas. The main functions of the spaces have been matched where appropriate, such as the visitor and community entrance from Rosslyn Hill and the main building user entrance off Downshire Hill. The existing two principle facades remain in essence unchanged. The new extension is a neat, tidy, crisp and clean volume as opposed to the tall existing wing which is littered with services and their penetrations, alongside various gantries, corrugated metal cladding and barred windows. It is important that in the continued role as a community asset that current and future generations understand what elements of the building original and which are new.
Objection	Response
6.13 The planning statement and design and access statement (DAS) have not undertaken a detailed assessment of the proposals against Camden Policy DP24.	LB Camden Policy DP24 is split into 9 sections and generally addresses design, context and quality. All parts of the policy are addressed within the proposals, as below.
Objection	Response
6.14-6.20 (“ <u>Character, setting, context and the form and scale of neighbouring buildings</u> ”). The proposed community use is not at a scale suited to the building or the surrounding area. The	These matters are largely subjective, however, the design has regard to the surrounding context, massing and materials. The extension is designed to be subservient or equal in height to the existing

proposals for the site are “incongruous”, with no attempt to integrate the design of the proposed extension to the existing building, or draw upon any design features in the surrounding area.	wing. Materials have been chosen from the local vernacular, brickwork is very prominent in the area with red brick to the street and London stock to the rear apparent at many nearby properties. This is echoed in the extension proposals with stock brickwork above a ‘plinth’ in grey brick, a colour that also features in the area. The new roof has a surrounding parapet to accommodate any external plant required. The plant is obscured from view (excluding flues which, for regulations, are required to terminate higher).
Objection	Response
6.21-6.26 (“ <u>the character and proportions of the existing building, where alterations and extensions are proposed</u> ”). The proposed extension has a bulk above the cornice line and against the flank boundary with number 26 Rosslyn Hill, which is unacceptable and contrasting to the existing wing proposed for demolition. The scale of the proposed extension is overbearing.	The height of the proposed extensions along the boundary to No 26 Rosslyn Hill is comparable to the existing wing (94.7m above sea level compared to 94.4m on the existing – 0.3m difference). The existing wing guarding remains at the same height for the entire length of the adjacent property, but then steps down to 92.4m and 90m beyond this point. The proposed extension also sits behind the line of the existing extension in plan and thus the impact on the surrounding and adjacent properties is less in height and length on plan.
Objection	Response
6.27-6.29 (“ <u>the quality of materials to be used</u> ”). The proposed materials are of a low quality and are designed to cover up the excessive massing. The applicant states that the design seeks to delineate from the existing building, however this can be achieved effectively without using contrasting bricks.	See point 6.12 response – it applies here.
Objection	Response
6.30-6.31 (“ <u>the provision of visually interesting frontages at street level</u> ”). Mesh above the front elevation lower ground floor light well play space will look unsightly and attract litter. The proposed use of the Downshire Hill entrance as the main entrance does not show respect to the importance of the Rosslyn Hill entrance. The proposals would result in noise and congestion on Downshire Hill, which is peaceful and has narrow pavements.	The mesh over the lower ground floor play area is proposed as fabric netting with steel hooks to attach it. This is proposed for the health and safety of the pupils and staff using the space which is below street level in order to avoid potential cause of injury/harm to the children and staff below. Litter would be removed. As confirmed at the consultation events, the Downshire Hill entrance would be used for access by school years Reception to Year 4 and staff. The Rosslyn Hill entrance would serve years 5 & 6, visitors and community access. This arrangement echoes the original police station, with staff entrancing from the rear (Downshire Hill) and the general public from Rosslyn Hill.
Objection	Response
6.32-6.34 No new objections.	
Objection	Response
6.35-6.37 (“ <u>the provision of appropriate amenity space</u> ”). Amenity space is underprovided for the scale of the proposal. The roof top play deck is unacceptable in terms of heritage, design and amenity. The light well play area is unacceptable in terms of security, pollution and noise impact on users. The under provision will have a negative impact on neighbours.	The amenity space is well designed, high quality and entirely suitable for an urban school site.

Objection	Response
<p>6.38-6.41 ("<u>accessibility</u>"). The main entrance should be on Rosslyn Hill. The conflict of use between the Downshire Hill entrance, acting as a service area, disabled car park and entranceway is unacceptable in safety terms. 800 pupils and parents (200 on Rosslyn Hill and 600 on Downshire Hill) will congregate in the mornings and afternoons, which will create unacceptable pedestrian issues.</p>	<p>The stated visitor numbers are over-inflated and unsubstantiated. The reality will be significantly lower, given:</p> <ol style="list-style-type: none"> 1. the high level of encouragement towards "pooling" school walks among parents in the School Travel Plan; 2. that the HCRD statement takes no account of staggered arrivals and departures; 3. that the school currently runs an early drop off facility (five days a week); 4. that the school anticipates expanding a breakfast club at the proposed site. Based on current attendance, breakfast club take-up is anticipated at around 15%; 5. that the school currently runs after school clubs (three per night five days per week). This would continue at the proposed site estimated 30-45% of pupils will attend until 4pm (one hour after school end, at 3pm); 6. that the school will also seek to provide additional care for around 10-20% until 6pm. <p>Downshire Hill is not expected to be an area where parent congregate since parents will be able to enter the site to collect children, rather than wait outside the school gate. Drop-offs/collections at the Rosslyn Hill entrance will further reduce any pressure in the area.</p>
Objection	Response
<p>6.42-6.49 ("<u>amenity considerations</u>"). At present the rear yard is used for limited parking. The proposed use of outdoor spaces will create noise issues for neighbours of the site, particularly the amphitheatre space where parents will congregate and children will play. The enclosed nature of the space will cause sound to reverberate. The submission makes no reference to hours of use of outdoor areas. There is significant concern of the noise emanating from the roof top play deck, which will be substantial due to its "elevated nature" and "lack of any form of acoustic screening". The acoustic assessment does not deal with the impact of noise from the site on neighbouring receptors. There is a potential for significant light spillage from proposed lighting, with 20 new lights, 15 of which are wall mounted light fittings above head height. There is no detail provided of play deck lighting, which could have a major impact.</p>	<p>The extant use at the site is a police station, and when operational, the rear yard was a hive of activity with circa 20 parking spaces. The rear of the site at ground level is for quieter external learning during school hours, which represents a planning improvement.</p> <p>Game, ball and PE activities will take place on the play deck to mitigate the level of sound since sound will project upwards.</p> <p>Planting is proposed to the boundaries and within the site to break up and deflect any noise. The acoustic impact assessment compiled by Pace Consult (acoustic) confirms that:</p> <p><i>"The calculated noise emissions from the play areas within the Abacus Belsize Primary School show that the average noise levels from the play area located on the roof of the new building should be below the noise climate affecting the nearest residential [...] the noise levels from the play are located at ground level are expected to be above the existing noise climate [...] but equal or below the levels recommended by the WHO to prevent serious annoyance during day time"</i>. The impact of the acoustics on local residents is considered within the design process and addressed. Also see parts of point 6.50-6.51.</p>
Objection	Response
<p>6.50-6.51 ("<u>ecology</u>"). No regard has been shown</p>	<p>A Phase 1 Habitat Survey is submitted with the</p>

<p>towards the impact of lighting on local ecology. No regard has been shown towards the impact of lighting on local ecology.</p>	<p>application. Habitats on site were evaluated as to their likelihood to provide sheltering, roosting, nesting and foraging habitat for all protected and invasive species. Those species identified as being present or potentially present, owing to suitable habitat being supported within the site, were:</p> <ul style="list-style-type: none">• Bats (medium potential); and,• Breeding birds (medium potential). <p>Proposed lighting comprises low level bollards and brick lights inserted into new low level brickwork walls that are less obtrusive or light polluting when compared with the existing flood lights currently serving the police yard. This represents a net improvement over the existing lighting. No flood lighting is proposed, on the play-deck or anywhere else. The play-deck will be used only during daylight hours.</p>
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7.0 Other comments	
Objection	Response
7.2 The applicant has overlooked the recommended collaborative approach to forming proposals set out in planning policy.	Members of the public have been given an opportunity to input in to the scheme in three public consultations events, plus a website and newsletters with response forms. The collaborative approach has been taken in accordance with the London Borough of Camden through utilising the Development Management Forum and numerous meetings with planners, heritage and transport officers as well as the CSF department. There have also been regular meetings with the staff and governors of Abacus Belsize Primary School. Governors have met with local residents, including residents associations, on numerous occasions.
Objection	Response
7.3 The “Development Management Forum” style of the initial public consultation was unproductive.	LB Camden uses the Development Management Forum as their preferred platform for communicating development proposals with local residents. The format of the event was undertaken by Camden officers in accordance with their protocols. We understood that residents felt their questions and views were not properly communicated during the event, and the application team decided to subsequently hold a more traditional public exhibition and an additional preview event.
Objection	Response
7.4 The application should not have been submitted prior to further consultation. The post-submission consultation events were “tokenistic” and had no bearing on the proposals	The application programme required submission on 22 March 2016. This is in order to meet a programme that would see this school opened in 2017, if planning permission is granted. We held the Development Management Forum on 24 February due to a delay which was outside the control of the applicant. The post-submission exhibitions were not ‘tokenistic’ and generated significant interest and responses from people. The preview event was attended by 52 people, and the exhibition was attended by 93 people. 15,000 info/ questionnaire leaflets were sent out and 221 responses were received.