The Society examines all Planning Applications relating to Hampstead, and assesses them for their impact on conservation and on the local environment.

To London Borough of Camden, Development Control Team

Planning Ref: 2016/1590/P

Address: Hampstead Police Station, Rosslyn Hill, NW3

Description: Change of Use to Abacus School

Case Officer: Zenab Haji-Ismail

Date 15 June 2016

Response to Statements by Friends of Abacus School relating to our comments dated 16 April 2016

(2 letters, undated: one of 3 pages addressed to HHS; one of 7 pages, addressed to Andrew Dismore AM)

This comment responds collectively to both letters

A. Lack of Consultation with Abacus.

Our policy on Planning consultation is that we examine applications when they are submitted, not before, and if necessary comment on them. We have no resources of time or money to enter into pre-application consultations, except when they are explicitly sponsored by LB Camden. We are especially cautious over making statements in the course of any consultations, before any opinions have been discussed and approved by our own committees, and have disagreeable experience of being misquoted in such circumstances. We do not enter into correspondence with applicants.

B. Enlargement of School Size

We note that the enlargement of the proposed school from a One-form Entry to a Two-form Entry (i.e. a doubling of size from 210 pupils to 420 pupils) was decided by the EFA, without, it seems, consultation with either the School or LB Camden. This seems irregular, and clearly makes much of the applicants' evidence on catchment area, mode of school travel and traffic matters completely out-of-date and inappropriate. We have seen no attempt to up-date any of this evidence.

C. Need

None of the evidence supplied to Mr Dismore on a statistical basis for the need for the school formed part of the Planning application; indeed we see no suggestion that it should be so regarded now.

We are in no position to challenge any of the statements now made, but we do comment we understand that LB Camden does not seem to agree with them, or the conclusions reached from them in respect of Abacus School.

One matter referred to stands out, however: predictions for future growth of population, and thus school need, are said to be concentrated in the Kings Cross area—not surprisingly, in view of the very large redevelopment in progress there. It is not clear how it can be argued that such future school need can be satisfied by enlarging schools provision in the North of the Borough; i.e. in Hampstead/Belsize Park.

The case for an additional school in our area is not convincingly made by these statistics.

Notwithstanding the present mix of LA and Fee-paying schools, the unarguable fact remains: there are already 37 schools (providing 10,250 places; 2015 figures) in our area. We are already a major schools zone , with all the unacceptable consequences that result. We have no need for yet another school, and local opinion is vehement on this. The precedents that would be set, and the long-term future of the site are referred to in our comments of 16 April 2016.

Abacus make no comment on any of this.

C Heritage

Abacus say that they would be preserving the building's heritage assets. We disagree.

Abacus deny that their design is no more than "facadism", yet a very substantial part of the existing fabric would be demolished, leaving only the street-visible bits standing. That is what we define as facadism, and that the proposals do not respect its heritage integrity.

D. Size and Obtrusiveness

Abacus say that their proposed building is not larger than the existing building. We never said it was, but that its scale was overbearing, and would harm neighbouring residential areas.

In fact, the part of the new building that would be most obtrusive, the roof-top Play Area, is higher than any part of the existing building, and is considerably wider and more visible from Downshire Hill. A corner of the new Hall structure is also higher.

It is the scale and bulky appearance of the new work to which we object, rather than its floorspace. This would give it an overbearing and obtrusive appearance.

E. Roof-top Play Area

Abacus say that this would not lead to unacceptable noise pollution, overlooking and loss of privacy.

We do not need lessons on acoustics and noise management; we also have the benefit of professional advice. The protective screens may deflect some of the noise upwards, but they, together with the hard floor surface, would also amplify it, so that its overall volume is undiminished, and the external nuisance not reduced appreciably.

The overall effect of childrens' excited high-pitched voices, and the incessant thud of footballs on floor, walls and screens, would constitute substantial nuisance to many neighbours.

Abacus do not comment on the overlooking and loss of privacy that would occur.

Abacus say that any nuisance that might occur would be limited to termtime break periods only. We doubt this; the out-of-hours use of school buildings is commonplace, even encouraged, and use of the roof would go along with this.

F. Architecture

Abacus defend the design of their building, saying that it "entirely appropriate" to its function as a place for the education of small children. We disagree with this fundamentally, and maintain our view that it is over-scaled, lumpish, and with the character of a 1990's office building; not child-friendly or the right environment for primary-age children.

The "Visuals" shown on their drawing P700 are a revealing illustration of this character. Apart from wondering why the existing red-brick building is shown whitewashed, we believe that the forms and colours as drawn prove our point graphically

G Transport

Abacus say that "the new school will have little or no effect on local traffic". This is pure phantasy; it would be bound to have a serious impact on it., for these reasons:

1. Catchment Area.

It is clear that the Catchment Area submitted with the Planning application is completely out-of-date and irrelevant; it is based on the original school size of 210 pupils. With a need to attract 420 pupils, it plainly has to double in size. Whether this is Northwards, deeper into Hampstead Village, or South/Easterly into Swiss Cottage and West Hampstead, or Westerly across Finchley Road, we do not know. Whichever expansion is selected, it will lead to longer travel distances. Since the application Area already stretches walking distances to the limit, particularly with the gradients concerned, it is plain that the percentage of school walkers would fall rapidly, and car-borne access increase accordingly

2. School travel mode.

As we indicated in our comments of 16 April 16, parents and carers need little encouragement to use car-borne school access. Travel distance, road gradients, weather conditions and just pure idleness will all play a part, and it is transparently clear that the new school would bring very substantial schoolrun traffic to Rosslyn Hill and Downshire Hill.

As indicated above, we believe that our existing schoolrun traffic, congestion and parking chaos, from our existing 37 schools are enough---in fact already an unsustainable burden on our residents, and on traffic through the area generally. Rosslyn Hill is a major traffic route, and wider congestion would result from the addition of many scores of cars.

Abacus are right in saying that there would be no safe dropping-off points around the site. That however would not deter schoolrun drivers, who will park in the middle of the road if they have to, defying all traffic regulations. We have seen this behavior at dropping-off and collection times at other local schools, and there is no sign that possible action by police or traffic wardens acts as any sort of deterrent.

Pavement congestion would also occur, especially during the afternoon collection period. With one parent/carer per child, that makes 820 people blocking the narrow pavements, especially the Downshire Hill one, by the main entrance doors.

Parking for the coaches required for school trips and other activities would also present a considerable problem at this busy crossroads.

Abacus's statements on the effects of schoolrun traffic and pavement congestion are naïve and misleading.

H. Sustainability

Abacus say that the designed airconditioning is necessary because of traffic noise. Since it is designed only for the main Hall area, not the classrooms, this seems strange, to say the least.

Such expensive and carbon-emitting installations have no part in the construction of primary schools., and their arguments are unconvincing.

I Air Quality

As we pointed out before, the Rosslyn Hill area is one of the worst areas in Camden for air pollution; public health is already seriously at risk.

Adding further schoolrun car traffic to it would of course make it worse, and to site a primary school in the thick of it would be irresponsible.

J. Precedents

Abacus make no comment on our serious concerns (see our comments dated 16 April 16) over the precedents that would be set by approving a further school in the centre of an area already grossly over-provided, and of the possible future consequences of a change to the fortunes of the school.

K Local Residents' Amenity

Abacus make no comment on the serious harm to local residents that would arise from the establishment of the Abacus School.

The most obvious harm would arise from traffic and road safety concerns, overlooking and loss of privacy, especially from the Rooftop Plat Area, noise pollution, air pollution, and loss of the unique character of Downshire Hill. Abacus do not seem to think that these are issues that matter; we do.

We do not believe that Abacus's comments strengthen their case, and we renew our request for refusal.