

HAMPSTEAD POLICE STATION

ABACUS

EDUCATION ENVIRONMENT AND FACILITIES

ASSESSMENT SUMMARY AND POLICY REASONS FOR REFUSAL

Mary Webster, a specialist consultant in reviewing school proposals from the aspect of the educational environment and facilities, has castigated the proposals on multiple grounds, all of which flow from the attempt to grossly overdevelop a constrained site and buildings.

MOVEMENT AND ACCESS

Contorted, cramped and inadequate circulation with difficult way-finding and self orientation.
Impractically constrained for wheelchair bound pupils and teachers.
Major congestion at key times (breaks and evacuations).
Drop off and pick up very challenging from inappropriate entry points.
No provision specific provision for school trip coaches
Conflict of parking provision, refuse collection and access producing unacceptable safety issues.

LEARNING SPACES

Many cramped/undersized and poorly configured classrooms.
Poor natural lighting in many spaces.
Limited space for specialist subjects
Unacceptable absence of windows in year 3 classroom, interview room and heads office, deputy heads office. Rooflight provision not an appropriate substitute.
Inadequate , deficient and polluted external learning areas.

PLAY SPACES

Totally inadequate for all ages
Grossly deficient in relation to usual standards BB103
Caged rooftop playground not even large enough for smallest team sport provision
Nb. BB 103 Standards:
Hard Outdoor PE 1.5 sm per pupil ie 630sm.
Proposal is for approx 165sm ie 25% of recommended provision, and below the base figure of 400sm ,precluding team sports.
Soft Informal social area 2 sm per pupil ie 840sm
Nominal rear shared area only
Hard Informal social area
Nominal rear shared area only
Soft outdoor PE 20sm per pupil ie 8400sm
None provided.

CONCLUSION

Totally inadequate spaces will prevent successful delivery of an appropriate curriculum and play activity.
Compromised environmental conditions
Compromised access and movement.

The proposed provision is substantially below the standard of other primary schools and will disadvantage pupils for years to come.
Health and safety issues are significant and this alone makes the proposed design unacceptable.

POLICY REASONS FOR REFUSAL

HEALTH AND WELLBEING

The significant deficiency of the proposal in providing an acceptable standard of educational accommodation should be seen in terms of planning policies relating to health and wellbeing:
London Plan 3.2

ACCESSIBILITY

The unacceptably restricted circulation compromising wheel chair access:

Camden Development Plan Policy DP29

-expect all buildings and places meet the highest practicable standards of access and inclusion

-expect spaces between buildings to be fully accessible

London Plan Policy 7.2

-'can be used safely, easily, and with dignity by all regardless of disability'

London Plan Policy 7.7:

-'this policy seeks to achieve the highest standards of accessible and inclusive design'

Accessible London SPG

3.1 Inclusive access to employment

Nb. Should be applied in regards to wheel chair bound teachers/support staff

3.6 Education

-SPG Implementation Point 16: Access to Education

-'proposals for education facilities should aim to achieve the highest standards of safe, easy and inclusive access for all people regardless of disability, age or gender'

Note:

Notwithstanding the grossly deficient design the provision is likely to be many orders of cost greater per pupil than anywhere else in the country and London specifically.



Dear Antonia,

There were some technical difficulties at the time I sent in this objection. I trust you received our letter objecting to the above proposals for Hampstead Police Station, together with Paul Velluet's detailed report (as referred to therein) which sets out why he considers the proposals inappropriate and unsympathetic, and were able to consider that prior to inputting upon the draft report to Committee. Please would you confirm.
A copy is attached for ease of reference.

I understand that the applications are due to be considered by Camden's Planning Committee on 28th July.

Please do not hesitate to contact Paul Velluet or myself if we may be able to assist at all. Paul's number is 07764 185 393

Regards,

Christine Hereward
Partner (Non Member)

Head of Planning and Public Law
Howard Kennedy LLP

t: +44 (0)20 3755 5498
f: +44 (0)20 3650 6850
m: +44 (0)7866 971681
christine.hereward@howardkenedy.com

No.1 London Bridge London SE1 9BG
DX 144370 Southwark 4
www.howardkenedy.com

From: Christine Hereward
Sent: 06 June 2016 17:15
To: Haji-Ismail, Zenab
Cc: johnjoseph@won234.com; 'sandrajoseph999@gmail.com'
Subject: Former Hampstead Police Station and Magistrates' Court - 2016/1590/P & 2016/2042/L

Dear Ms Haji-Ismail,
Please see attached letter (the body of which is set out below) and Reports attached.
These are submitted on behalf of the owners of no. 24 and as objections to the current applications.
Would you please confirm safe receipt.

Former Hampstead Police Station and Magistrates' Court - 2016/1590/P & 2016/2042/L

I represent Mr and Mrs Joseph, whose home at 24 Rosslyn Hill adjoins the former Police Station.

As you will be aware from letters of objection lodged by my clients and many others, the proposals as submitted for a School at the above property are causing great concern.

With regard to two particular issues, we sought the advice of specialists in the field and hereby share their findings with you.

Heritage

Please find attached the Report of Paul Velluet, M.Litt., RIBA, IHBC, CHARTERED ARCHITECT.
Paul Velluet's report details why he finds the proposals inappropriate and unsympathetic.
I trust that his name will be familiar to you and your colleagues, but a note on Paul Velluet's substantial experience (including at English Heritage and Westminster City Council) is also provided.

Noise

The particularly shrill, erratic and disturbing noise of children playing has not been properly addressed in the applicant's submissions.

Please find attached the report of Dani Fiumicelli, Technical Director: Noise and Vibration, at the Temple Group.

My clients maintain concerns on various other grounds also, including traffic/highways issues and the lack of credibility of the applicant's Travel Plan.

We trust that the attached documents will assist the Council in considering the current applications.

Regards,

Christine Hereward

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howard kennedy

Zenab. Haji-Ismail@camden.gov.uk

Our ref CH2
Doc ref DH4/25212251.1

Dear Ms Haji-Ismail,

6 June 2016

Former Hampstead Police Station and Magistrates' Court - 2016/1590/P & 2016/2042/L

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**HAMPSTEAD POLICE STATION AND MAGISTRATES' COURT, ROSSLYN HILL AND
DOWNSHIRE HILL, HAMPSTEAD, LONDON, N.W.3.**

COMMENTS ON THE CONSERVATION AND DESIGN ASPECTS OF THE PROPOSALS
SUBJECT OF APPLICATIONS FOR PLANNING PERMISSION AND LISTED BUILDING
CONSENT – CAMDEN COUNCIL REFERENCES 2016/1590/P AND 2016/2042/L

I. INTRODUCTION

- I.1 These comments have been prepared by Chartered Architect, Paul Velluet, on behalf of Mr and Mrs John Joseph, owners and residential occupiers of the listed property at no. 24, Rosslyn Hill, which lies in close proximity to the south-eastern boundary of the application site. The comments relate specifically to the conservation and urban design aspects of the proposals which are currently the subject of applications for Planning Permission and Listed Building Consent (references 2016/1590/P and 2016/2042/L) for the proposed change of use, part-demolition, part-reconstruction, extension and alteration of the existing, statutorily-listed, disused Hampstead Police Station and Magistrates' Court, located at the corner of Rosslyn Hill and Downshire Hill, to create the proposed Abacus Belsize Primary School, submitted by Maddox and Associates on behalf of Kier Construction London Ltd. These comments supplement the representations already submitted to the Council on behalf of Mr and Mrs Joseph.
- I.2 These comments have been informed by an inspection of the application site from adjacent, publicly accessible areas and from Mr and Mrs Joseph's property, from past familiarity and knowledge of this part of Hampstead, and from a careful examination of the documentation submitted in support of the applications, including, most importantly, the drawings showing the existing building, the extent of proposed works of demolition and the proposed development; Built Heritage Consultancy's 90-page *Heritage Statement*; Maddox Associates' *Planning Statement*; and Watkins Gray International's 68-page *Design and Access Statement*.
- I.3 These comments conclude that the submitted proposals, by virtue of the extent of the proposed works of demolition of surviving parts of the original building of 1911-1913 designed by John Dixon Butler and only listed in 1998, and the scale, bulk and design of the proposed new development on the site:
- Would result in substantial harm to the particular special architectural and historic interest and significance of the building and its setting, to the settings of nearby listed buildings, to the character, appearance and significance of the Hampstead Conservation Area and to the setting of the nearby Fitzjohns/Netherhall Conservation Area, would not offer substantial public benefits that would outweigh such harm, and
 - Would fail to preserve the special interest of the building, its setting and the settings of nearby listed buildings, or sustain their significance, and would fail to either preserve

or enhance the character and appearance of the Hampstead Conservation Area, or sustain its significance.

- 1.4 On this basis, the proposals would be contrary to the relevant National, London-wide and local planning and conservation policies and guidance, and the relevant, published guidance of Historic England, and the applications should be refused accordingly.

2. ISSUES ARISING FROM THE DOCUMENTATION IN SUPPORT OF THE APPLICATIONS

- 2.1 Despite the considerable detail and length of the submitted *Heritage Statement* and the extensive verbatim quoting of policy in Section 4 of the *Statement*, the authors of Section 3 – Significance – reach some highly questionable conclusions about the relative ‘significance’ of the site and its component parts, reflected in the colour-annotated diagrams of each floor of the building shown on pages 50, 51, 32 and 53 of the *Statement*.
- 2.2 The identification of the greater part of the substantially original, structural walls and staircases within the building, and the greater part of the substantially original, outer walls of the projecting wing at the rear of the block fronting Rosslyn Hill, close to the south-eastern boundary of the site, as of only ‘low significance’, and the identification of the substantially original end-wall and its modest return at the south-eastern end of the block fronting Rosslyn Hill, the substantially original, external walls to the rear of the blocks fronting Rosslyn Hill and Downshire Hill, and the substantially original, end-wall at the north-eastern end of the block fronting Downshire Hill, as of only ‘medium significance’, suggests a serious undervaluing of the structural and architectural integrity and significance of the building, the considerable extent of surviving, original building fabric – both walls and floors, and the extent to which the original layout of the building is still discernible at each floor level. It is assumed that decisions on the extent of proposed works of demolition and reconstruction are based on this questionable assessment.
- 2.3 The extent of the proposed works of demolition at each floor level shown in the colour-annotated ‘as existing’ plans P402, P403, P404, P405 and P406, under which the vast majority of internal structural elements and many of the external structural elements are to be removed, suggests that this is little more than a façade-retention exercise rather than a sound, conservation-based development shaped in accordance with relevant, national, London-wide and local planning and conservation policies and guidance, and the published guidance of Historic England. Whilst recognising that the building has been extensively and adversely altered over the years, much of such work would appear to be reversible, offering scope to recover the original, understated

character of the building whilst introducing sensitive internal and external changes to facilitate its appropriate re-use.

- 2.4 Even if the loss of so much of the surviving, original fabric and layout of the existing building were to be accepted, the bulk and design of the proposed new development on the site appears to be markedly insensitive to the particular special interest and significance of the remaining parts of the building, and to the settings of nearby listed buildings in Rosslyn Hill and Downshire Hill, and to the particular character, appearance and significance of the Hampstead Conservation Area and to the setting of the nearby Fitzjohns/Netherhall Conservation Area. The strongly expressed, rectilinear geometry of the proposed new elements and their elevational design, including the use of two-tone brickwork, together with the vast, open 'play-deck', appear to be particularly at odds with the Dixon's architecture and the distinctive, residential character of the surrounding area to the north-east and south-east of the application site. Little attempt appears to have been made to develop a design which is responsive to the particular architectural character of the original building.
- 2.5 Ironically, the submitted 3D visuals demonstrate very clearly the potentially harmful impact of the proposals on the listed Police Station and Magistrates' Court and their setting.
- 2.6 It is reasonable to suggest that different and more sympathetic proposals for the re-use of the building could provide for a very much sensitive, conservation-based solution.

3. CONCLUSION

- 3.1 Overall, it is considered that the submitted proposals, by virtue of the extent of the proposed works of demolition of surviving parts of the original building of 1911-1913 designed by John Dixon Butler and only listed in 1998, and the scale, bulk and design of the proposed new development on the site:
 - Would result in substantial harm to the particular special architectural and historic interest and significance of the building and its setting, to the settings of nearby listed buildings, to the character, appearance and significance of the Hampstead Conservation Area and to the setting of the nearby Fitzjohns/Netherhall Conservation Area, would not offer substantial public benefits that would outweigh such harm, and
 - Would fail to preserve the special interest of the building, its setting and the settings of nearby listed buildings, or sustain their significance, and would fail to either preserve or enhance the character and appearance of the Hampstead Conservation Area, or sustain its significance.

- 3.2 On this basis, the proposals would be contrary to the relevant National, London-wide and local planning and conservation policies and guidance, and the relevant, published guidance of Historic England, and the applications should be refused accordingly.

Paul Velluet

26th May, 2016.



PAUL VELLUET, M.Litt., RIBA, IHBC, CHARTERED ARCHITECT
9, BRIDGE ROAD, ST MARGARET'S, TWICKENHAM, T.W.1. 1.R.E.
e-mail: paul.velluet@velluet.com; telephone: 020 8891 3825; mobile: 07764 185 393

PAUL VELLUET - CHARTERED ARCHITECT CONSERVATION, DEVELOPMENT AND PLANNING

THE CONSULTANCY

PAUL VELLUET - CHARTERED ARCHITECT is an independent consultancy specialising in the provision of professional and technical advice to property owners, prospective developers and other planning and building professionals on projects involving new development in historic areas and the conservation, alteration and extension of historic buildings, particularly at the critical pre-planning and planning stages.

Established at the beginning of 2005, the consultancy undertakes work for commercial, educational, residential, cultural, diplomatic, church, health-sector, hospitality-sector and rural-estate clients. Clients have also included historic London estates, historic building trusts and local amenity and community groups.

Work undertaken by the consultancy includes:

- Research and the preparation of assessments of the architectural and historic interest and significance of historic buildings and sites;
- The drafting and submission of documentation supporting proposed development and works in relation to national, London-wide and local planning and conservation policies and guidance;
- Support for appellants and local planning authorities in Written Appeals, Informal Hearings and Public Inquiries and for property owners at Lands Tribunal Hearings; and
- Collaborative and creative engagement with local authority planning and conservation officers.

PROFESSIONAL QUALIFICATIONS AND EXPERIENCE

- A chartered architect - a member of both the RIBA and the Institute of Historic Building Conservation;
- A member of both the Franco-British Union of Architects and the Worshipful Company of Chartered Architects;
- Over thirty-five years working in both private practice and the public sector specialising in building conservation and development in historic areas;
- Project architect with architects Manning Clamp + Partners, Richmond, Surrey, 1972-1976; Principal Urban and Design and Conservation Officer in Westminster City Council's Department of Planning and Transportation, 1976-1991; Regional Architect and Assistant Regional Director, English Heritage London Region, 1991-2004; Senior Associate, Conservation and Planning, with the major Central London commercial practice HOK Architects, 2005-2011; and full-time independent consultancy, 2012 to the present;

- Project architect (with Manning Clamp + Partners) for the repair and restoration of no. 4, The Terrace, Richmond, Surrey - a scheme awarded *European Architectural Heritage Year (Civic Trust) Award* in 1975;
- Project architect (with Manning Clamp + Partners) for the planning and design stages for the repair of Decimus Burton's Temperate House in the Royal Botanic Gardens, Kew, Surrey - a scheme awarded a *R.I.B.A. Awards commendation* in 1983;
- Exhibitor in the Architecture Room of the Royal Academy of Arts Annual Summer Exhibitions, 1975 and 1981;
- Architect for other projects that have received awards and commendations under local awards schemes;
- Formerly Inspecting Architect for St Matthias' Church, Richmond, Surrey; Holy Trinity Church, Eltham, London, S.E.9.; and St Peter's Church, Petersfield, Hampshire; and
- Consultant architect for major re-ordering schemes at Holy Trinity Church, Eltham and St Peter's Church, Petersfield, and major works of conservation at St Paul's Church, Wimbledon Park, London, S.W.19.

ACADEMIC QUALIFICATIONS AND INTERESTS

- Holds B.A. Hons and B. Arch. Hons. degrees from the University of Newcastle-upon-Tyne;
- Awarded a Master's degree by the University of Newcastle-upon-Tyne for his thesis on the life and work of the distinguished cathedral and church architect Stephen Dykes Bower;
- Formerly a member Executive Committee of the Society of Architectural Historians of Great Britain;
- Formerly a visiting lecturer on conservation, planning and access law and practice at the University of Newcastle-upon-Tyne;
- Currently lectures on listed building law and practice, conservation and development in Central London, liturgical planning, and the local history of Richmond and adjacent areas in south-west London.

OTHER PROFESSIONAL ENGAGEMENT

Past roles include membership of:

- The Planning Group of the RIBA;
- The Thames Landscape Strategy Panel of the Royal Fine Art Commission;
- The Cathedrals Fabric Commission for England; and
- The Board of the Museum of Richmond, the Board of the Orange Tree Theatre, Richmond and The Executive Committee of The Richmond Society; and
- Twenty years' service as a Trustee of the Covent Garden Area Trust, and
- Five years' service as an assessor for the RIBA/Crown Estate's Annual Conservation Awards and as a Trustee of The Richmond Charities.

Current roles include membership of:

- The RIBA's Awards Group;
- The Cathedrals Fabric Commission's Technical Group;
- The Archdiocese of Westminster Historic Churches Committee;
- The Guildford Cathedral Fabric Advisory Committee;
- The Council of the Ecclesiological Society; and
- Service as Inspecting Architect for St Paul's Church, Wimbledon Park, London, S.W.19., as a Trustee of The Richmond Parish Lands Charity, and as a Trustee of the Garrick's Temple to Shakespeare Trust.

PUBLICATIONS

Contributor to various publications, journals and guidance including:

- *Context: New buildings in historic settings* (The Architectural Press, 1998); *The Buildings of England, London 2: South* (1983), and *The Buildings of London, London 6: Westminster* (2003);
- *The Architects' Journal*, *Planning in London*, *Urban Design Quarterly*, English Heritage's *Conservation Bulletin*, *Church Building* and *Ecclesiology Today*, and
- Diverse policy and guidance documents for Westminster City Council and English Heritage.

FURTHER INFORMATION

A schedule of projects undertaken by the consultancy since the beginning of 2005, including details of clients, and particulars of most projects, is available on request.

Paul Velluet

January, 2015.

PAUL VELLUET, M.Litt., RIBA, IHBC, CHARTERED ARCHITECT
 9, BRIDGE ROAD, ST MARGARET'S, TWICKENHAM, T.W.1. I.R.E.
 e-mail: paul.velluet@velluet.com; telephone: 020 8891 3825; mobile: 077 64 185 393