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Textlink 020 7974 6866planning@camden.gov.uk  
www.camden.gov.uk/planningApplication Ref: **2014/7847/P**  
Please ask for: **Jenna Litherland**  
Telephone: 020 7974 **3070**

27 January 2016

Dear Sir/Madam

**DECISION**

Town and Country Planning Act 1990 (as amended)

**Full Planning Permission Refused**Address:  
**1-3 Arkwright Road  
Hampstead  
London  
NW3 6AA**

Proposal:

Expansion of St Anthony's School (1 Arkwright Road), to include the change of use of No. 3 Arkwright Road from residential (Class C3) to education use (Class D1), a 3 storey rear extension including excavation to No. 3 and formation of cycle parking.

Drawing Nos: (10695) SK01/10 Rev C, SK01/04 Rev B, SK01/05 Rev B, A1000 Rev A, A050, A200, A201revA, A300 Rev B, A400 Rev A, A900, A901, Transport Assessment revision 1 by Parsons Brinckerhoff dated 7th July 2015, School Travel Plan dated 18/12/2014, School Development Travel Plan, Air Quality Assessment Report (ref 70000384) dated July 2015, Waste Management Strategy revision 1 dated 9th January 2015, Design and Access Statement version 3.0 dated 19th December 2014, Basement Impact Assessment - Screening Report by Price Myers (ref 23757), Acoustic Report prepared by Sharps Redmore dated 19th December 2014, 1-3 Arkwright Road Consultation Assessment dated December 2014, BREEAM: Pre assessment statement for non-residential development, Planning Statement dated December 2014.



The Council has considered your application and decided to **refuse** planning permission for the following reason(s):

#### Reason(s) for Refusal

- 1 The proposed development, by virtue of its dependence on travel by private motor vehicles, would fail to adequately promote sustainable modes of transport or mitigate the impacts of the development on the already congested transport network. This would be contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the core strategy) of the London Borough of Camden Local Development Framework Core Strategy; and policies DP16 (The transport implications of development), DP17 (Walking, cycling and public transport) and DP21 (Development connecting to the highway network) of the London Borough of Camden Local Development Framework Development Policies.
- 2 The Basement Impact Assessment fails to demonstrate that the proposed development would maintain the structural stability of the host and neighbouring properties and would not adversely impact upon the local water environment, contrary to policies CS5 (Managing the impact of growth and development) and CS13 (Tackling climate change through promoting higher environmental standards) of the London Borough of Camden Local Development Framework Core Strategy; and to policies DP23 (Water), and DP27 (Basements and lightwells) of the London Borough of Camden Local Development Framework Development Policies.
- 3 The proposed development, in the absence of a legal agreement to secure the development as fully 'car-free', would be likely to contribute unacceptably to parking congestion in the surrounding area and promote the use of non-sustainable modes of transport, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Core Strategy and DP18 (Parking standards and limiting the availability of car parking) of the London Borough of Camden Local Development Framework Development Policies.
- 4 The proposed development, in the absence of a legal agreement to secure a Construction Management Plan (CMP), would be likely to give rise to conflicts with other road users, and be detrimental to the amenities of the area generally, contrary to policies CS5 (Managing the impact of growth and development), CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP20 (Movement of goods and materials) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.
- 5 The proposed development, in the absence of a legal agreement to secure an updated Travel Plan and contributions to cover the costs of monitoring and reviewing the Travel Plan for a period of 5 years, would fail to ensure that the development promotes and sustains the use of sustainable modes of transport, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP16 (Transport implications

of development) and DP17 (Walking, cycling and public transport) of the London Borough of Camden Local Development Framework Development Policies.

- 6 The proposed development, in the absence of a legal agreement to secure contributions towards public highway works, would be likely to harm the Borough's transport and public realm infrastructure, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Core Strategy DP16 (The transport implications of development), DP17 (Walking, cycling and public transport) and DP21 (Development connecting to the highway network) of the London Borough of Camden Local Development Framework Development Policies.
- 7 The proposed development, in the absence of a legal agreement to secure contributions for pedestrian and cycling improvements in the local area, would fail to contribute to enhancing facilities to promote sustainable modes of travel, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP16 (The transport implications of development), DP17 (Walking, cycling and public transport), DP19 (Managing the Impact of Parking) and DP21 (Development Connecting to the Highway Network) of the London Borough of Camden Local Development Framework Development Policies.
- 8 The proposed development, in the absence of a legal agreement securing a design and post-construction sustainability review achieving 'excellent' in a BREEAM Assessment and the submission and compliance with an Energy Efficiency Plan securing the measure set out in the Energy Strategy, would fail to be sustainable in its use of resources, contrary to policies CS13 (Tackling climate change through promoting higher environmental standards) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 (Promoting sustainable design and construction) and DP23 (Water) of the London Borough of Camden Local Development Framework Development Policies.

Informative(s):

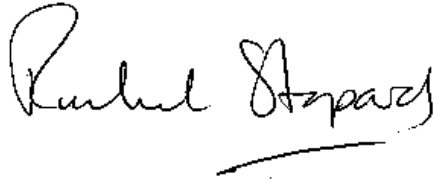
- 1 You are advised that reasons for refusal 3-8 could be overcome by entering into a S106 legal agreement.
- 2 You are advised that the proposed elevation drawing A300B has incorrect labels of "proposed south elevation" and "proposed north elevation".

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraphs 186 and 187 of the National Planning Policy Framework.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

A handwritten signature in black ink, appearing to read 'Rachel Stopard'. The signature is written in a cursive style with a long horizontal flourish at the end.

Rachel Stopard  
Director of Culture & Environment

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	11/03/2015
		N/A	<b>Consultation Expiry Date:</b>	12/02/2015
<b>Officer</b>			<b>Application Number(s)</b>	
Jenna Litherland			2014/7847/P	
<b>Application Address</b>			<b>Drawing Numbers</b>	
1-3 Arkwright Road Hampstead London NW3			See draft decision notice.	
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Expansion of St Anthony's School (1 Arkwright Road), to include the change of use of No. 3 Arkwright Road from residential (Class C3) to education use (Class D1), a 3 storey rear extension including excavation to number 3 and formation of cycle parking.				
<b>Recommendation(s):</b>		Refuse planning permission		
<b>Application Type:</b>		Full Planning Permission		

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
<b>Consultations</b>						
Adjoining Occupiers:	No. notified	<b>49</b>	No. of responses	<b>137</b>	No. of objections No. of support	<b>58</b> <b>79</b>
Summary of consultation responses:	<p>Site notice displayed from 21/01/2015 until 11/02/2015  Press notice displayed from 22/01/2015 until 12/02/2015</p> <p>58 Objections received with the following concerns:</p> <ul style="list-style-type: none"> <li>• Schools are taking up houses and sites which would otherwise be available for residential use in an area where there is a shortage of housing.</li> <li>• This application involves the loss of three residential dwellings.</li> <li>• DP2 seeks to maximise and protect housing. In particular it states that developments that involve the net loss of two or more homes should be resisted. This is contrary to that</li> <li>• The local area has too many schools adding to nitrogen dioxide pollution due to school runs.</li> <li>• The over-concentration of schools is increasing the levels of particular air pollution in Hampstead</li> <li>• Camden Council's 2010 traffic survey showed that local schools are responsible for thousands of extra car journeys</li> <li>• BIA is inadequate – London Clay is considered to cause shrink/swell subsidence locally. Site is prone to flooding</li> <li>• Para 6.1.2 of the transport statement states most students live locally with 250 out of 294 live within three miles of the school.</li> <li>• Travel Plan is misleading and shows that only 27% of pupils live close enough to walk to school.</li> <li>• Difficult to enforce the Travel Plan</li> <li>• Road safety concerns</li> <li>• Kiss and Drop scheme will hold up south-bound traffic on Arkwright Road. Such a scheme will only work successfully with a school which has a large car park set away from the main road.</li> <li>• Doesn't state where parent who are let for the kiss and drop can park?</li> <li>• Existing residents will be inconvenienced by the increased traffic and parking problems. Parents currently block driveways of existing homes on Arkwright Road</li> <li>• The property makes a positive contribution to the Conservation Area and any changes would need to be sympathetic to the character of the area. Proposed extension would be unsympathetic</li> <li>• Would be a health risk to children and other residents in terms of pollution</li> <li>• Design and Access Statement does not record the planning history accurately</li> <li>• Noise from change of use, harm the peace of the area</li> <li>• Noise from plant equipment</li> <li>• Loss of green space</li> </ul>					

**Cllr Mennear** (ward Councillor for Frognaal and Fitzjohns) objects to the application on the following grounds:

- The change of use of 1-3 Arkwright Road to educational usage is unacceptable. NW3 already has an immense number of private schools.
- Neighbouring amenity of local residents will be greatly impacted if the proposal for the school goes ahead
- The impact of these schools on local residents is immense due to the very large quantity of parents who choose to drive their children to school.
- The kiss and drop bay will not address the issues. Cars will approach the school from both directions and will therefore cause traffic jams up Arkwright Road as they seek to cross traffic to park at the bay and from both directions on Fitzjohns Avenue as they seek to turn into Arkwright Road and find the bay is occupied.
- The school's estimates for the number of additional car journeys are fantastical. Girls are more likely to be driven to school than boys, owing to fears over security. The estimates were made for the existing boys' school.

79 responses were received in support summarised as the following:

- The borough is in need of new school places
- The additional places for girls is welcomed at a successful school
- The school over time would become fully co-educational.
- Particularly it would help families seeking a Catholic education for their schools.
- A key positive would ensure children will not have to cross the road during the school day to get from one building to another.
- Although the area is heavily congested, this relates principally to traffic which is trying to avoid the Finchley Road.
- Traffic is marginally worse at pick up and drop off times, and even then the addition of 140 places where a lot of the students will have siblings at the school will not materially increase the traffic flow.
- The proposal is a great idea without the huge disruption and delay of building from scratch.
- The school has taken a number of measures to encourage pupils to use sustainable transport to get to school and is willing to cut the number of new pupils coming to the school by car.
- Loss of residential is not a strong argument as there would be an increase in hundreds of new school places would be gained.
- The school has shown its commitment to sustainable travel by being awarded the TFL "bronze award".
- Expansion of St Anthony's school would create employment for up to 15 teachers and support staff.

**CAAC/Local groups\*  
comments:**

\*Please Specify

Heath and Hampstead Society

- For many years, Hampstead has been a magnet for school development in North London, overwhelmingly in the private sector. This has now reached the point of over-development, to the great detriment of the local community. This concentration of schools in Hampstead and its near neighbouring areas, is completely disproportionate, unsustainable, and justifies restraint, in order to mitigate (although not eliminate) its harmful effects.
- Within the small area of NW3, there are (2015) a total of 39 schools, with a total school roll of over 10,250 students.
- There should be achieved by enforcing a cap on school rolls, with the emphasis on Primary schools, the source of most of the damage. We call for such a cap to be included in your reasons for refusal to the application.
- Overwhelming majority of students live distant from the area - Hampstead residents have to bear the cost and significant inconvenience of hosting these “cuckoos in the nest”. This has led to considerable resentment. No compensating local benefits exist, and the situation is widely considered inequitable and unfair.
- Traffic congestion - During term time school run periods—roughly 8-00 to 9-30 am and 3-00 to 5-00 pm... traffic virtually grinds to a halt in all the areas where schools are concentrated. The epicentre of this congestion is the corner of Fitzjohns Avenue and Arkwright Road: the site of St Anthony’s School, the applicant of these proposals. There is widespread disregard of parking regulations, not helped by an apparently routine absence of traffic wardens. Driving courtesies are non-existent, and tempers frequently raised. Local residents are obstructed and harassed by school run drivers, who seem to think they have priority and rights not available to others.
- Increases in air pollution - occurred by the increased volumes of school run traffic are dangerous. This is made worse by the fact that vehicles are at a standstill in traffic for so long. This unnecessary extra pollution is affecting the health of our children.
- Loss of residential use - the need for maximising residential floorspace in Camden is still very strong, and we categorically disagree that this development benefits the community.
- Overdevelopment of the site - the provision of open space and garden area is insufficient and inappropriate for school use, especially for nursery school-age children. It is quite inadequate for 140 children. There are no trees of any size, or provisions for natural shade.

Netherhall Neighbourhood Association:

- The NNA objects to the Change of Use of 3 Arkwright Road from Residential to Educational Use as this will mean the loss of residential in our Residential Area and will result in a further severe imbalance in the area between school places and residents.
- The children are largely from homes outside of the immediate area. The NNA objects to resultant increase in car traffic and parking in the area which is suffering critical problems with traffic congestion, and illegal parking.



- Will increase air pollution in an area where it is already at critically high levels detrimental to residents and schoolchildren. The Travel Plan is flawed.
- Reference to "Park and Stride" is not specific and unenforceable. (Please note the "Park and Stride" policy in the Travel Plan for South Hampstead School for Girls in Maresfield Gardens has not been implemented nor enforced.) The encouragement of parents to drive by a "Kiss and Drop" Zone is strenuously opposed as it will encourage additional car traffic.
- Extension at the rear of the school is of a very poor design. Its massing and fenestration, with small ill proportioned windows, is out of keeping with the original Edwardian buildings which will cause further erosion of the character of this Conservation Area. In no way can it be described as enhancing the character of the area.

#### Church Row and Perrins Walk Neighbourhood Forum

Object to the application.

- There are currently 55 schools in NW3 with more than 11,500 pupils of which 4500 are at schools on or very close to Arkwright Road and Fitzjohns Avenue. The population of Hampstead Town Ward is just 10,616 of which less than 1200 are of school age. The number of pupil places is a multiple of the number of local pupils.
- Policy DP2 seeks to maximise and protect housing. In particular it states that developments that involve the net loss of two or more homes should be resisted. The proposed development involves the loss of three residential dwellings. The NPPF (paragraph 37) states that planning policies should aim for a balance of land uses within an area.
- Hampstead is massively overly concentrated on schools, and has a shortage of housing. The application to convert the property from residential (Class C3) to education (Class D1) should be refused.
- Camden Council's 2010 traffic survey showed that local schools are responsible for thousands of extra car journeys. In 2007 the NO<sub>2</sub> levels were between 50 and 60  $\mu\text{g}/\text{m}^3$ . Whilst for London as a whole, pollution levels have remained relatively flat, in Hampstead the position has grown significantly worse. For 2009 to 2013 the NO<sub>2</sub> levels were between 58 and 73  $\mu\text{g}/\text{m}^3$ . Individual days are higher. National and European guidelines state that the figures should not exceed 40  $\mu\text{g}/\text{m}^3$ . A recent parliamentary report highlights that air pollution is an invisible killer costing the lives of 29,000 per year. Environmental considerations dictate that there should be no increase in the school run and that additional schools should be built close to where the pupils live.
- Contrary to Policy DP16 that states "in areas with an existing problem with the school run, it is unlikely that the Council will grant planning permission for educational facilities that are likely to exacerbate the problem". As a matter of policy all schools should be looking to protect their pupils, and as a minimum have proactive travel plans to reduce vehicle traffic. Such plans have to be self-governing as with one Camden Council employee monitoring all such plans for the entire borough there is no real ability to monitor never mind enforce.

	<p>St Anthony's plan is well researched but the harsh reality is that an additional 140 pupil places can't improve matters, and thus the application should be refused.</p>
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## Site Description

The application site hosts No.1 Arkwright (existing school) and No.3 Arkwright Road (adjacent existing dwelling). Number 3 currently contains a three storey with basement residential property which is subdivided into 3 residential apartments which are currently in occupation.

The site is within a predominantly residential area, although across the road is Devonshire House (preparatory and pre-preparatory school). There is another school building at 90 Fitzjohns Avenue. Both numbers 1 and 3 Arkwright Road are noted within the Fitzjohns/Netherhall Conservation Area as making positive contributions to the special character and appearance of the Fitzjohns/Netherhall Conservation Area.

The existing school is St Anthony's Preparatory School an independent Catholic preparatory school for boys aged 5 to 13. The school currently uses two sites: 1 Arkwright Road and 90 Fitzjohns' Avenue. There are 310 students in total, 60 full time and part time teaching staff. The existing school operates from 0815 to 1630hrs Monday to Friday for pupils and from 0715 until 2000hrs for staff, 34 weeks of the year.

## Relevant History

### 1 Arkwright Road NW3

2011/1613/P - Erection of single-storey rear extension to link swimming pool to existing rear classroom block (following removal of sheds) and erection of extension and canopy to link swimming pool enclosure and main school building and associated landscaping (Class D1). Granted planning permission on 15/06/2011. As part of this application the Heath and Hampstead Society and CAAC raised concerns about potential increase in pupil numbers at the school as a result of the proposal. Although additional facilities would be required, the school has confirmed that the proposal would not result in an increase in the roll number of pupils attending the school. This was confirmed in writing by the Bursar of the school (letter dated 27<sup>th</sup> May 2011).

PWX0002300 - Erection of a single storey rear extension to accommodate an additional classroom. Granted planning permission on 11/09/2000

9005472 - Erection of a clear glazed polycarbonate structure enclosing existing swimming pool. Granted planning permission on 07/03/1991

8905551 - Alterations and extensions including the addition of a conservatory to the rear elevations the erection of a new external metal staircase on the rear elevation and internal alterations to provide two additional classrooms. Granted planning permission on 19/12/1989

TP617/9178 - Construction of an external staircase. Granted planning permission on 19/08/1959

TP617/110155 - The use of No. 1, Arkwright Road, Hampstead, as a day school. Granted planning permission on 11/01/1955

### 3 Arkwright Road

CTP/F6/6/23/10525 - The conversion into three self-contained flats and the erection of an extension at No. 3 Arkwright Road. Granted planning permission on 22/04/1971

### Relevant nearby sites

#### 9 Arkwright Road

Prior Approval was granted on 20/06/2014 for the change of use from existing offices to 7 residential units 1 x 2 bed, 4 x 3 bed, 1 x 4 bed, 1 x 5 bed (2014/2695/P)

Planning permission was granted on 19/01/2015 for the enlargement of two third floor roof dormers, alterations and additions to existing fenestration and alterations to hard landscaping (2014/6794/P)

## **Relevant policies**

### **LDF Core Strategy and Development Policies**

- CS1 (Distribution and growth)
- CS2 (Growth areas)
- CS3 (Other highly accessible areas)
- CS4 (Area of limited change)
- CS5 (Managing the impact of growth and development)
- CS6 (Providing quality homes)
- CS10 (Supporting community facilities and services)
- CS11 (Promoting sustainable and efficient travel)
- CS13 (Tackling climate change through promoting higher environmental standards)
- CS14 (Promoting high quality places and conserving our heritage)
- CS16 (Improving Camden's health and well-being)
- CS18 (Dealing with our waste and encouraging recycling)
- CS19 (Delivering and monitoring the Core Strategy)
- DP13 (Employment sites and premises)
- DP15 (Community and Leisure uses)
- DP16 (Transport implications of development)
- DP17 (Walking, cycling and public transport)
- DP18 (Parking standards and the availability of car parking)
- DP19 (Managing the impact of parking)
- DP20 (Movement of goods and materials)
- DP21 (Development connecting to the highway network)
- DP22 (Promoting sustainable design and construction)
- DP23 (Water)
- DP24 (Securing high quality design)
- DP25 (Conserving Camden's heritage)
- DP26 (Managing the impact of development on occupiers and neighbours)
- DP28 (Noise and vibration)
- DP29 (Improving access)
- DP31 (Provision of, and improvements to, open space, sport and recreation)
- DP32 (Air quality and Camden's Clear Zone)

### Camden Planning Guidance

- CPG1 Design 2015 – chapters 1-4 and 6
- CPG2 Housing 2015 – chapters 1 and 6
- CPG3 Sustainability 2015– chapters 1, 4, 9
- CPG 4 Basement and Lightwells 2015 – chapters 1-4
- CPG6 Amenity 2011 – chapters 1, 2, 4, 6, 7, 8, 9
- CPG7 Transport 2011 – chapters 1, 2, 3, 5, 6, 7, 8 and 9
- CPG8 Planning Obligations 2015 – chapters 1, 2, 3, 4, 5, 7, 10

Fitzjohns/ Netherhall Conservation Area Statement 2001 pages 10, 13, 21, 30, 36-41

## **NPPF 2012**

## London Plan 2015 with alterations since 2011

### Assessment

#### Proposal

The application proposes:

- Change of use of No. 3 Arkwright Road from residential to education use which would see the addition of 140 additional school places.
- Creation of seven new classrooms and the relocating of two existing classrooms from 1 Arkwright Road.
- Three storey rear extension including excavation to 3 Arkwright Road that will house two classrooms.
- A new dining hall facility to accommodate the school at the enlarged Arkwright Road site
- A “kiss and drop” area at the front of the site.
- New outdoor play space in the rear garden of 3 Arkwright Road
- New linkage between number 1 and number 3 Arkwright Road
- Cycle parking facility
- Installation of PV panels on the roof

The applicant undertook a consultation assessment which outlined their intentions to the neighbouring properties as well as the parents of the schools.

The scheme proposes the change of use of 3 Arkwright Road from residential (Class C3) to education use (Class D1) (580 sq metres of additional D1 education space created). The property will be refurbished, extended to the rear and linked internally to 1 Arkwright Road (St Anthony’s School). The redevelopment of no. 3 would allow for an additional 140 pupils from the introduction of a single form of entry for girls. The additional 140 pupils would be created over a period of 7 years.

Year 1 (2015) – 20 additional pupils  
Year 2 (2016) – 40 additional pupils  
Year 3 (2017) – 60 additional pupils  
Year 4 (2018) – 80 additional pupils  
Year 5 (2019) – 100 additional pupils  
Year 6 (2020) – 120 additional pupils  
Year 7 (2021) – 140 additional pupils

The application proposes a three storey rear extension at basement, ground and first floor level at the rear of number 3 Arkwright Road. This would have a maximum external height of 7.5m, depth of 6.2m and width of 6.4m. The internal floor heights at lower ground floor would be 2.4m, at ground floor 2.3m and first floor 2.4m. The total internal height would be 9.1m. At lower ground floor/basement level a staff room/ kitchen extension would be provided which would extend the basement up to the boundary with number 1 Arkwright Road. At ground floor level a Year 1 classroom 2 would be provided and at 1<sup>st</sup> floor level a year 4 Classroom 5 would be provided. A lift shaft/entrance has been proposed to link nos. 1 and 3 Arkwright Road.

The principal considerations material to the determination of this application and summarised as follows:

- Principle of loss of residential floorspace and replacement with educational use
- Design
- Standard of accommodation
- Amenity
- Basement
- Transport
- Sustainability
- Trees and Landscaping
- Community Infrastructure Levy

**Principle of loss of residential floor space and replacement with educational use:**

CS6 (Providing quality homes) advises that the Council will aim to make full use of Camden's capacity for housing and delivering residential development is a priority when considered the future of unused and underused land and buildings. This is achieved by various measures including minimising the net loss of existing homes. The Council recognise there may be situations where the loss of housing can be justified. DP2 (Making full use of Camden's capacity for housing) advises that the only exception to the general protection of residential floorspace is limited loss of residential floorspace to provide small-scale healthcare practices meeting local needs.

The proposal sees the loss of 3 residential dwellings. The loss of residential floorspace to create additional floorspace for the expansion of a private school would not comply with policy DP2 and therefore considered unacceptable in usual circumstances. The applicant concludes within the Planning Statement that although the proposal conflicts with Policy DP2 it should be considered that the overall benefit of the scheme outweighs that of a policy adopted at a time of limited population growth.

Whilst the proposal would be contrary to the Council's policy DP2, on balance, the application is in accordance with paragraph 72 of the NPPF where 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 and where relevant give great weight to the need to create, expand or alter schools. Policy 3.18 of the London Plan 2015, consolidated with alterations since 2011, supports development proposals which enhance education and skills provision, including new build, expansion of existing facilities or changes of use to educational purposes.

The applicant has undertaken some research and concluded that there is significant need for additional school places in the Hampstead Area, especially those seeking a Catholic education. The applicant goes on to state that 7,000 new homes are being planned within the borough for the next five years which would increase demand for school places.

The argument also put forward by the Applicant is that a significant supply of housing has been created by the change to the GPDO which enables the change of use from office to residential under permitted development. This type of housing has not been included in the Borough's projection largely due to them not meeting the required specifications usually for acceptable living accommodation as per London Plan guidance. Recently no. 9 Arkwright Road was converted from office accommodation to 7 residential units (see planning history above). It is argued that an increase of 7 dwellings in the locality will outweigh the proposed loss of 3 dwellings as part of this proposal.

In conclusion it is considered that whilst the loss of 3 dwellings is contrary to policy DP2 within the Council's LDF, the extension of the existing school and creation of 140 new school places by 2021

would, on balance, be in line with the guidance within the NPPF and the London Plan 2015.

## **Design**

Policy DP24 and DP25 require new development to respect its site and setting; with regard to extension that they should not harm the architectural quality of the existing building and pay due regard to its form, proportions, its character and its setting and, in conservation areas ensure that development preserves and enhances the special character or appearance of the area. The visual impact of additions to buildings can be a material factor in planning terms whether or not they are visible from private or public views. That is particularly the case in development that takes place in conservation areas.

The proposed three storey rear extension would project from the rear of no. 3 Arkwright Road and extend at basement level. The extension would appear secondary to the main building at no.3. The pitched roof sits below the upper roof of the building. The extension has been designed to have a pitched roof which differs to the existing rear elevation of the host building which has a flat roof. The Fitzjohns/Netherhall Conservation Area Statement does state that extensions should be in harmony with the original building. Alterations have previously taken place at no.3 which has seen alterations to the original roof form. It is considered that the proposed rear extension would be a modest addition to the host building and would not detract from its appearance. The rear extension would terminate a full storey below the eaves and would be considered acceptable in its location due to the types and styles of neighbouring properties and their extensions. The proposals also involve removal of a non-original ground and first floor extension which attaches the building to number 5 Arkwright Road. This would enable the front façade to return to its appearance as detached from number 5 and allow access to the proposed cycle racks in the rear garden of number 3.

An informative is added advising the applicant that the proposed elevation drawings are incorrectly labelled with the North elevation being labelled as the south elevation and vice versa.

At ground floor level there would be changes to the front boundary, a new boundary wall and front gate would be positioned to match the previous front wall. Due to the topography of the site and the fact it slopes downwards the heights of the front boundary wall ranges from 1.4 to 1.6m and this would be finished with planting to improve the appearance. The front garden and rear gardens of no.3 Arkwright Road would be altered. At the front and leading to the side and towards the rear would be a tarmacked area. The rear garden would have a higher level play area which is accessed directly from the rear of the building and a reinstated landscaped garden at lower ground level. The higher ground level would be finished with blue rubber crumb which is typical of children play areas.

The proposed PV panels at roof level would be visible from the street however would only project a maximum of 30cm from the flat roof therefore views would be limited and would not harm the appearance of the host building or the surrounding Conservation Area .

The proposed alterations are considered acceptable in design terms and would comply with policies CS14, DP24 and DP25. They would not detract from the appearance of the host building or the Fitzjohns/Netherhall Conservation Area.

## **Amenity**

In order to satisfy the requirements of policies CS5 and DP26 and the guidance set out in CPG6, it needs to be demonstrated that the proposed rear extension would not have a negative impact on the amenity of the residential occupiers of those flats at no. 5 Arkwright Road by reducing light or creating a sense of enclosure and negatively affecting their outlook.

The proposed three storey extension would be set away 8 metres from the shared boundary with number 5 Arkwright Road therefore would have no adverse impact on residential occupiers of number 5 A in terms of loss of light or sense of enclosure.

The closest noise sensitive residential properties to the site are located at number 5 Arkwright Road and properties to the north east on Fitzjohns Avenue. A noise assessment has been carried out and this is largely based on the current usage of the rear garden at 3 Arkwright Road. The new proposal would see this space used as a quiet area for pupils in order to minimise the noise impact for residents at number 5 Arkwright Road. The assessment sets out that at the time of the assessment this would have been the worst case scenario and the new proposal would be better in that the school playground is located adjacent to no. 1 Arkwright Road. The noise assessment report is considered to be acceptable and in line with policies DP26 and DP28 of the LDF. Were the application to be recommended for approval a condition would be attached which would restrict the playground area to adjacent to number 1 Arkwright Road and the rear garden of number 3 used as a quiet area only.

### **Basement**

The site is located in an area of surface water flow and flooding constraint. The application proposes lowering of the existing lower ground floor level by around 200mm in order to increase the floor to ceiling height and an extension at lower ground floor level to increase the floor area by approximately 50sqm. The applicant has submitted a Screening Report which concludes that a full basement impact assessment is not required.

The Screening Report carries out a desk study answering the questions set in the flow charts of Chapter 3 of CPG4. Where the respondent has answered a “yes” to a question in the flow chart, CPG4 requires a written justification. The Screening Report does provide written justification regarding the “yes” responses however further study of the potential impacts are required particularly regarding the depth of foundations relative to neighbouring properties. The proposals involve extending the basement up to the party wall with number 1 Arkwright Road which does not have an existing basement. There is no detail of the potential impact that the excavation may have on the existing neighbouring building and the Screening Report does not adequately assess the exact levels of the existing sites.

No physical site investigation has been carried out to check existing footing depths and provide the information required for the detailed design of the lower ground floor / basement. The Screening Report does not progress to stage 2 (scoping) and does not demonstrate that the proposed basement excavations would not have significant adverse impacts on the structural stability of the application site and adjacent properties, drainage and the local water environment. This is contrary to guidance within CPG4 and policies CS5, CS13, CS14, DP23, DP25, DP26 and DP27 of the LDF.

### **Transport**

The site is located on the south side of Arkwright Road near the junction with Fitzjohn's Avenue (B511). It is also located in the Frognal and Fitzjohns Ward, the Fitzjohns Netherhall conservation area, and the Hampstead (CA-H) controlled parking zone (CPZ) which operates between 0900 and 2000 hours on Monday to Saturday. The Council's records indicate that parking stress is a significant issue in the Hampstead controlled parking zone (i.e. 111 parking permits issued against every 100 spaces). The site also benefits from a PTAL rating of 6a (excellent), which means it is highly accessible by public transport.

There are existing problems with the high number of parents picking up/dropping off their children by cars in the immediate area, particularly along Arkwright Road and Fitzjohns Avenue. There are currently 5 separate school properties in the immediate vicinity:



- St Anthony's Preparatory School Senior House at 1 Arkwright Road;
- Devonshire House Preparatory Pre-Reception, Reception and Upper School at 2-4 Arkwright Road;
- St Anthony's Preparatory School Junior House at 90 Fitzjohns Avenue;
- Fitzjohns Primary School at 86a Fitzjohns Avenue;
- Devonshire House Preparatory Junior School at 69 Fitzjohns Avenue;

The property at 1 Arkwright Road is currently used as an overflow site for the main St Anthony's School which is located on Fitzjohns Avenue. No. 3 Arkwright Road is currently in residential use. As part of the application, 3 Arkwright Road would form a new school for the girls who will be introduced to the school. This new extension would see an additional 140 pupils and 29 staff.

The applicant has proposed a park and ride scheme which would see a dedicated place for pick up and drop-offs at an off-site location, the O2 retail centre car park on the Finchley Road. The site is 750m southeast of St Anthony's School. The scheme will allow parents who have to drive as their only option to use the car park from which the children would be picked up by minibus and taken to the school. The parents would be able to park free of charge for 15 minutes on each visit. There would be school staff operating the park and ride scheme at the O2 centre park. The minibus would use the "pick-up point" located on Blackburn Road. The proposed minibus would typically have 17/18 seats such as a Ford Transit (460) or Fiat Ducato. The minibus will arrive at the O2 centre at 8.00 and once filled should arrive at the school at 8.30. Once there is more than one minibus in use these would be staggered by a period of 5 minutes. The staggered approach has been proposed to reduce congestion during the school in front of the school.

### *Trip Generation*

The property at no.3 Arkwright Road contains three flats and would only create trips relating to residential uses. The existing school site provides educational facilities to 295 pupils and 60 staff. The proposal would see an additional 140 pupils and 28 staff visiting the site. Currently 45% of pupils and 20% of staff travel to the school sites by car, despite the area having excellent access to public transport. This is far above the borough average and concerns have previously been raised by transport officers and residents regarding the traffic congestion caused by the current travel patterns. The new proposals would introduce 7 additional class rooms to accommodate an additional 140 pupils and 29 staff.

The proposed scheme would put unnecessary additional pressure on the transport network including the public highway in the local area. This would be contrary to Camden Development Policy DP16 which states that it is "essential that there is sufficient transport capacity available to allow for travel demands, generated by new development". The Council would not be able to provide additional capacity for motor vehicle trips on the public highway in the local area due to a lack of available road-space. Additional trips made by motor vehicle could not therefore be mitigated. Although it is suggested that some new pupils for the girl's school would travel with siblings from the existing boy's school, minimal information in the Transport Assessment has been submitted on which to base this suggestion. A significant increase in trips to and from the site is anticipated.

The transport network including the public highway in the local area is currently under pressure from school run trips generated by an abundance of educational centres located within a short distance of this site. This includes Devonshire House School (located across the road), Fitzjohn's Primary School (located 150 metres away), Henderson Court Day Centre (200 metres), University College Senior

School (250 metres), St Mary's School (250 metres), North Bridge House Senior School (200 metres) and The Tavistock Children Day Unit (300 metres).

The submitted Transport Assessment outlines that the new site would reduce the need for pupils to cross the road to their secondary site by 78% improving road safety, but in the analysis of road traffic accident data no issues are raised and no accidents in the last 5 years have been the result of this flow of pupils. This evidence suggests there are suitable measures in place for pupils to make this journey in a safe manner and the current situation does not have a detrimental impact on highway safety.

DP16 also states directly "the concentration of schools in parts of Camden..., has led to traffic congestion, road safety and parking problems related to the school 'run'.....In areas with an existing problem with the school run, it is unlikely that the Council will grant planning permission for educational facilities that are likely to exacerbate the problem."

This site is already considered to be suffering from existing problems with the school 'run' and is considered to be suffering significant parking problems.

Taking into account the large increase in car usage it is deemed that this development would not be in line with The London Plan Policy 6.1 "encouraging patterns and nodes of development that reduce the need to travel, especially by car", DP16 or DP17 of the LDF.

#### *Travel Plan*

The applicant has submitted a framework Travel Plan (TP) in support of the planning application. This aims to promote the use of sustainable modes of transport through a range of soft measures, as well as highlighting the benefits of travelling by modes other than the private car. The draft TP has been reviewed against Transport for London guidance and Camden best practice and is considered to put too much emphasis on a Park & Ride strategy to Finchley Road. The Existing Park & Ride service accounts for 8% of the trips made from the collection point on Blackburn Road to the school.

There is currently only one mini bus in service which would already have to be increased to accommodate the additional pupils to maintain 8% of the modal split and would have to be greatly expanded to create a modal shift away from car which is already considered too high. A Park & Ride service, dropping pupils off at the O2 centre, does not take cars off the road and promote sustainable transport, as policy requires and would only serve to shift the congestion issues to another area close by. This would not reduce overall trips in the area and is contrary to policy DP17 "The provision of sustainable travel options is essential in order to reduce the environmental impact of travel, to support future growth, to relieve pressure on Camden's existing transport network."

The School has proposed that any new pupils joining the school would be required under contract with the school to use the Park & Ride scheme however as the Local authority we would not support this due to the reasons above and we would not be able to adequately enforce that new pupils use the park and ride proposal.

More commitment would be required from the school to promote walking and cycling to meet Core Strategy CS11 and DP17 which states that "The Council will resist development that would be dependent on travel by private motor vehicles."

The Council's School Travel Plan Officer has pointed out that there has not been a strong enough commitment over the years to reduce the high level of car trips to and from the site. In addition, it has been pointed out that there are insufficient facilities currently in place to allow and encourage the existing staff and pupils to travel to and from the site by more sustainable modes of travel such as

cycling. The applicant has been advised that the current transport issues should be dealt with before the school is expanded.

Were the scheme to be considered acceptable then the school travel plan would need to be monitored and revised for a period of 5 years. As such, a one off financial contribution of £5,902 would need to be secured to cover the costs of monitoring and reviewing the travel plan over a 5 year period, secured by a Section 106 legal agreement.

#### *Cycle Parking*

Policy DP18 requires development to sufficiently provide for the needs of cyclists, which are contained in Appendix 2 of the Development Policies document. The London Plan also provides guidance on cycle parking standards these are outlined in Table 6.3 of The London Plan 2015. Table 6.3 of the London Plan requires for long stay 1 space per 8 pupils and 1 space per 8 staff and for short stay 1 space per 100 pupils.

The proposal would provide a total of 24 cycle parking spaces for pupils and staff of which 22 would be long stay and 2 short stay. The cycle storage would all be covered and secure and located within the school grounds at the rear of number 3. No details have been received as to where the cycle parking for visitors would be located. If a suitable location can be found, then the proposed number for visitor parking would meet the minimum requirements. Were the application to be considered acceptable this would be secured via planning condition. Also 20 scooter parking spaces have been provided next to the cycle storage, this is an added benefit and would help to promote an alternative to car use.

If planning permission was granted the 24 cycle parking spaces and 20 scooter parking spaces as proposed should be secured by condition.

#### *Car-free Development*

Development policy DP18 states that the Council seeks to ensure that developments provide the minimum necessary car parking provision. The Council expects development to be car free in the Central London Area, the town centres of Camden Town, Finchley Road/Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport. As already mentioned, the site is located in the Hampstead controlled parking zone (CA-H). In addition, the site has a PTAL rating of 6a (excellent), which means it is highly accessible by public transport. Were the application to be considered acceptable, the development would be secured as car free, secured via Section 106 legal agreement. This would allow the proposal to be in accordance with Core Strategies CS11 and CS19 and Development Policies DP17, DP18, DP19 and DP21.

The proposal would not provide any parking spaces on the site and would involve the removal of 4 on-site car parking spaces. This is welcomed and would help to minimise the impact of the development on the local area and what is already a highly stressed Controlled Parking Zone. It would also help to encourage staff to travel to and from the site by sustainable modes of transport. For car free developments, the Council will:

- not issue on-street parking permits;
- use planning obligations to ensure that future occupants are aware they are not entitled to on-street parking permits; and
- not grant planning permission for development that incorporates car parking spaces, other than spaces designated for people with disabilities, and a limited number of spaces for car capped housing in accordance with Council's Parking Standards.

The proposal does not include any provision for disabled parking spaces on the site. This is acceptable as the proposal falls below the threshold whereby disabled parking would be a policy requirement.

As a result of the removal of the 4 on-site parking spaces, the 2 existing vehicular crossovers would become redundant and would need to be removed by the Council at the developer's expense. As part of the works associated with removing the redundant vehicular crossover, it has been proposed to reorganise the on-street parking control measures as follows.

- Relocate the existing residents parking bay from outside 3 Arkwright Road to a new location further south along Arkwright Road.
- Replace the relocated residents parking bay and double yellow lines outside 3 Arkwright Road with a single yellow line. This was originally proposed by the applicant to create a proposed "Kiss and Drop Zone" outside the school for parents to drop off and collect children by car. This "Kiss and Drop" idea has now been withdrawn from the Application, but the changes are still proposed and would amount to the same concept.

The proposal for these changes falls outside the control of the applicant as this is subject to Traffic Management Order changes within the Highways Act. As the local highway authority, it can be advised that changing the existing double yellow road markings would not be supported and would be resisted, in context of planning this is seen as seeking to be actively encourage parents to travel to and from the site via car. It is also not a recognised use of kerb side space that the Council would support and is contrary to DP17 ("The Council will resist development that would be dependent on travel by private motor vehicles."), DP19 and DP21 ("Developments should "avoid harm to on-street parking conditions or require detrimental amendment to Controlled Parking Zones.").

#### *Construction Management Plan (CMP)*

Policy DP20 seeks to ensure that movements of goods and materials is minimised. The application is for a change of use which includes basement works. It is within a predominantly residential area and as such a Construction Management Plan would be needed. The primary concern is public safety but the council would also need to ensure that construction traffic does not create or add to existing traffic congestion. During construction there is likely to be a rise in amenity issues for local people e.g. noise, vibration and air quality. Due to this being a predominantly residential area a CMP would be needed (secured via a S106 legal agreement) to ensure the development can be implemented without being detrimental to neighbouring amenity. The CMP would also be needed to ensure the proposal would conduct a safe and efficient operation of the highway network. A CMP would be necessary prior to any works commencing on site.

#### *Servicing*

The proposals would not significantly increase the level of deliveries which already occur at the school. The proposal would see the creation of kitchen facilities which would result in some deliveries which may be need to be made outside numbers 1& 3 Arkwright Road. The proposed servicing strategy would see the introduction of a single yellow line outside 3 Arkwright Road. The new single yellow line would not be consistent with the existing double line approach which can be found outside of the building the other option was to use the existing bus bay outside of the operational hours. The introduction of a single yellow line would be resisted by the local highway authority as this would be inconsistent with the double yellow line function already in place. The servicing strategy, relying on the single yellow, is therefore not acceptable in its current.

The bus bay is in operation between 0800 and 0900 hours and 1500 and 1700 hours on Monday to Friday. Delivery vehicles would only seek to use this space outside of these hours. Subject to securing a Service Management Plan (SMP), that manages arrivals and departures from the site in a

timely manner, the proposed servicing arrangements are generally acceptable. If planning permission is granted it is therefore recommended that a SMP be secured by condition.

### *Highway safety*

The submitted Transport Assessment outlines that the new site would reduce the need for pupils to cross the road to their secondary site by 78% improving road safety, but in the analysis of road traffic accident data no issues are raised and no accidents in the last 5 years have been the result of this flow of pupils. The Council consider that suitable measures are in place for pupils to make this journey in a safe manner and the current situation does not have a detrimental impact on highway safety.

### *Highways contribution*

The summary page of Development Policy DP21 states that 'The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'. The footway directly adjacent to the site is likely to sustain significant damage as a direct result of the proposed works.

The proposal would also require the removal of redundant vehicular crossovers, amendments to traffic management orders (to relocate residents bays), and amendments to existing traffic calming measures on Arkwright Road. Further information regarding level plans would be required were the proposals to be considered acceptable. The plans should clearly demonstrate that the completed development can be tied into the surrounding public highway (footways).

If the application were acceptable in all other respects a financial contribution for highway works and level plans would be secured through a S106 legal agreement. This would allow the proposal to comply with Development Policy DP21.

### *Pedestrian, Cycling, Environmental and Public Realm Improvements*

The Council has been investigating ways of encouraging walking and cycling as the primary modes of transport for trips to and from the site. It is considered that this can be done by making improvements to walking and cycling routes in the local area that help complement the nearby Cycle Superhighway proposals currently being developed by TfL on Finchley Road. If the application were acceptable in all other respects a financial contribution of £30,000 would be secured through a S106 legal agreement.

### **Trees**

There is a copper beech tree which is protected by a TPO, located in the playground of number 1 Arkwright Road and various significant mature trees at the rear of number 3 and at neighbouring properties which are located in a conservation area. F/N30 of the Fitzjohns/Netherhall Conservation Area Statement says that "all trees which contribute to the character or appearance of the Conservation Area should be retained and protected. Developers are expected to incorporate any trees sensitively into the design of any development, and demonstrate that no trees will be lost or damaged before, during or after development." The Applicant has not submitted a tree survey with the application in accordance with BS5837 2012 and therefore not adequately demonstrated that the nearby trees wouldn't be adversely affected by the proposed development and construction works. Were the proposals to be considered acceptable a condition would be added requesting a tree survey to be submitted.

## **Sustainability**

### *Energy*

The proposed new school would be within the old residential building. As such there is not a set policy target for CO2 reduction but the new development is required to follow the energy hierarchy. The submitted energy statement shows that a 27.4% reduction would be achieved beyond the existing building baseline through energy efficiency measures. The applicant has shown that its heating and lighting upgrades are the main energy efficiency savings.

CPG3 requires a 20% reduction through renewable energy where feasible. The applicant has not been able to achieve this; this is largely due to the constraints posed by the re-use of the existing building. The applicant has proposed solar PV panels above the third floor which face south-east. In order to maximise their potential it would be better for these to be orientated directly south and angled as close to 30 degrees as possible. The roof has potentially more space for solar PV panels providing there is no overshadowing. This would help to further reduce CO2 emissions however does not form a substantial for refusing the application.

If the application were acceptable in all other respects compliance with the Energy Statement would be secured by a S106 legal agreement.

### *BREEAM*

A BREEAM score of 79% which is an 'excellent' rating in accordance with Policy DP22 of the Development Plan policies is proposed. The applicant has committed to a minimum score of 60% within the energy and water categories and 40% in the materials category. This would have been secured by a legal agreement with a requirement that evidence of a final BREEAM Certificate being issued prior to occupation.

### *Air Quality Management*

The proposal site is located in an area where air quality is mainly influenced by emissions from road transport on Arkwright Road, the B511 Fitzjohns Avenue, which is less than 100m from the proposed site. A qualitative assessment was carried out by Parsons Brinckerhoff. The assessment includes the potential for future users of the proposed development to be exposed to poor air quality, given the site's location in an Air Quality Management Area and an assessment has been carried out of the impacts on air quality in the vicinity of the proposed Park and Ride scheme.

The assessment showed that the proposed development is considered to be a negligible to low risk site for dust deposition. The residual effects of emissions to air from construction vehicles and plant on local air quality is also negligible. The results show that the proposed development would cause an imperceptible increase in NO2, PM10 and PM2.5 concentrations as a result of increased vehicles visiting the site. While not required, the Council feels the developers missed an opportunity to address the impact of classroom air pollution ingress arising from traffic through the design of the development.

The incremental increases in local air pollution caused by increasing vehicle movements are a concern to the Council. While the development is not located within the designated Clear Zone set out in DP32, DP17 sets out that the council will "resist will resist development that would be dependent on travel by private motor vehicles", where air quality concerns are ancillary to the promotion of walking, cycling and public transport use. The 'park and ride' scheme proposed does not encourage modal shift away from car use. While the proposals may result in air quality emissions close to the school being avoided, these emissions are simply moved elsewhere. Thus while the development is not in direction contravention of DP32, the reasons for objection to the proposed development via Camden's

transport policies (DP16, DP17) is supported by the likely impact on air quality.

All dust mitigation measures listed in the dust risk assessment would also be secured within a Construction Management Plan (CMP) to be secured by a section 106 legal agreement if permission were granted. Given the proximity of a large number of sensitive receptors (a range of nearby schools), and the 'sensitivity of the Area to Dust Soiling Effects on People and Property' set out in the GLA SPG on Control of Dust and Emissions from Demolition and Construction (2014) is 'High', Camden would expect the CMP to include measures to continually monitor PM10. Any PM10 monitoring would have needed to have been secured by a section 106 legal agreement.

**CIL:**

The proposal would not be liable for either the Mayor of London's or Camden's Community Infrastructure Levy (CIL) as it relates to development in connection with educational use which is exempt.

**CONCLUSION**

Whilst the proposed change of use from residential (C3) to education (D1) would be contrary to policy DP2 as it results in the loss of three residential units, it is considered acceptable on balance as the proposal would be in accordance with paragraph 72 of the NPPF which gives great weight to the need to create, expand or alter schools.

The proposal is however unacceptable on account of the fact that it fails to fully take into consideration the transport implications of the development and fully address the Council's policy requirements with regard to basements and the resulting impacts of excavation.

The proposal would give rise to an increasing reliance on the private motor vehicle travel which does not comply with the Council's policies to promote sustainable modes of transport. The increase in number of students by 140 pupils over a period of seven years would lead to an increase in motor vehicle trips to and from the site. This is within the Hampstead area which is already at capacity in terms of vehicle use.