

I strongly object to Heathside Enterprises Ltd's latest expansion plan into Jack Straw's Castle (2019/0730/P) due to the effect it will have on traffic congestion and pedestrian safety.

I am at the Jack Straw's Castle roundabout during peak school run time every day, along with many other public transport users, including a large number of school pupils. This roundabout, at a key meeting point for the trunk roads from Highgate and Golders Green, is already extremely congested, requiring much care to use the zebra crossings. The school run is a well-documented and serious environmental issue for Hampstead and this proposed change of use would lead to an unacceptable harm to amenity. The proximity of the entry of the Heath car park, which the applicant proposes to use, to both a zebra crossing and a roundabout, make any entry and exit for school drop offs dangerous for pedestrians and other traffic.

Heathside Enterprises Ltd's own Transport Survey indicates that 26% of its pupils are driven to school. This is higher than the average for the area and indicates that the accumulative but rapid expansion of Heathside School has led to a wider catchment area. A further school building is likely to increase this trend. The Transport Statement makes no mention of delivery issues which have caused problems at other sites.

Whilst the Transport Statement correctly states that Heath Brow is a two way street, it does not mention that the entrance to the car park itself is single lane. This is likely to cause congestion for other car park users and this back up would affect North End Way and the Jack Straw's Castle roundabout. The catchment map provided suggests that many of these pupils' drivers would be making a right turn to return home or into central London. This would cause immense build-up as the road into Hampstead is already crammed at school run times. It would also have detrimental implications for pedestrian safety due to the nearby zebra crossing. I also disagree with the Transport Statement's claim that the roads in the vicinity of the site provide plenty of additional space to accommodate cyclists. The site is on a busy roundabout close to two other busy junctions. Most parents of primary school children would not feel safe having their children cycle to the school in the frustration of school rush hour traffic, even if cycle storage was provided. It is stated that the pupils would be having lunch at Jack Straw's Castle which would require food deliveries. The food deliveries made for the school's lunch room in the crypt of the Baptist Church on Heath Street causes traffic and pedestrian issues on Heath Street daily and this is likely to be replicated at Jack Straw's Castle which has a height restriction on the car park. Therefore the NPPF paragraph 109 cannot be used to support this development as there is an unacceptable impact on highway safety and the residual cumulative impacts on the road network would be severe. Safe and sustainable access to the site cannot be achieved for all users. Cramming another school building into an already congested area cannot be argued as supporting the Mayor's Healthy Streets and Healthy People initiative. The Transport

Statement suggests that if parent driver numbers were higher than planned, they could always park in the middle of the car park in undesignated bays. This would reduce the manoeuvrability of vehicles in the car park and is not an acceptable strategy! The dog walkers and other people who enjoy that part of the Heath who are not able to drive should not have to be boxed in by parental drop offs and pick ups. I fully support the arguments put forward by the City of London Corporation who manage the Heath who oppose this encroachment by a private corporation on one of only three Heath car parks.

I would like to challenge the assumptions in paragraph 2.19 of the Transport Statement and Tables 5.6 and 5.7 which makes the claim that a change in use “has the potential to reduce the number of two-way daily trips” This is based on the assurance that there will be no more than 70 pupils. At other sites, pupils have been squeezed into any available space, such as the attic at the White Bear Pub. Are we really to believe that the 5 classrooms and 3 very generous tutorial rooms are to be left largely unused? Even if they were, the increase in the extra 60 Year 5 pupils at the White Bear has been enough to bring chaos to the area. As the Jack Straw Castle site space has never been used as office space, where have these figures for B1 come from? The expensive daily parking charges at the car park and the site distance from other parking bays would make it very difficult for office staff associated with B1 to park at the site all day and arrive and leave during rush hour. No evidence is provided for the figures associated with D2 use and the claimed reductions in daily trips seem very spurious. Anecdotal evidence is that the gym users would walk or jog to the site and would be spread out during the day and evenings when car park and road use was less of an issue. The school drop off and pick up traffic in contrast will be concentrated at the most congested times of the day when pedestrian traffic is at its peak. I challenge the statement in 5.22 that this application should be viewed as a transfer of trips rather than as new trips as pupils are being “decanted” from recently rented sites. The Territorial Army barracks for example were only rented for extra Year 6 pupils in September 2018. It could be argued that this is a blatant attempt to misuse planning guidelines and continue the school's expansion.

I wholeheartedly object to Planning Resolution Ltd's similar attempts to circumvent the clear guidance in the Camden Local Plan which states that no further school buildings in Hampstead and Belsize Park should be permitted due to an existing surplus of school spaces. The familiar argument and empty promises are given which were made in previous representations that Planning Resolutions have made on behalf of Heathside School: this will not be an increase in pupil numbers, but rather a consolidation into a more suitable space. Heathside has expanded ruthlessly over the last 10 years. The pattern appears to be that it rents unsuitable spread-out accommodation, such as rooms in the Territorial Army barracks or taking over the first floor of a synagogue, to increase its fee income and numbers, then begs for more suitable accommodation on the grounds that it is not technically increasing its numbers. The accumulative effect of this tactic

and expansion has been devastating on the local community. Pupil numbers have increased rapidly from 133 in 2007 (*OFSTED inspection no.: 296820*) to 552 in 2019 (*OFSTED inspection no.; 10078946*). Effects on school run traffic in the area have led to Camden proposing controversial, expensive and inconvenient traffic restrictions in New End. Enough!

The dramatic increase in pupil numbers at the New End and Heath Street sites have happened despite assurances at every planning application that this is for ancillary space or a “shuffling” of pupils around local sites. How can this be when pupil numbers at Heath Street and New End sites in January appear to now be 400 pupils? Please refer to planning permissions reference no.s, *2007/3144/P; 2013/0973/P; 2014/0286/PRE; 2016/6345/P and 2016/2200/L*. One of these was the “temporary” shared use of the White Bear pub which was “overspill teaching spaces, a music room and shared community use. The space has been filled with 3 permanent Year 5 classes (approximately 60 pupils) fitted out with whiteboards with no sign of the pub being allowed to reopen and residents powerless to do anything about it. Planning Resolutions even has the cheek to refer to Heathside School as being “at the heart of the local community”. This is at odds with its occupation of the White Bear which is meant to be “a community of asset value” and is simply not true.

The Planning Statement continues that:

*On the basis that Heathside School (Lower School) has capped student numbers as part earlier proposals relating to additional premises on Heath Street (2014/5352/P), the School are agreeable to further limit the use and number of pupils within Jack Straw's Castle. As such, the land use principle is supported by Policy C2.*

Such claims need to be investigated as the increase in numbers on the Heath Street and New End sites indicate that pupil numbers must have increased in these locations with the numerous applications (*2007/3144/P; 2013/0973/P; 2014/0286/PRE; 2016/6345/P and 2016/2200/L*). It is wrong to quote the NPPF to support the application. Camden have demonstrated in its previous refusals of planning applications for Abacus Primary School, Devonshire House and St Antony's for Girls, that the duty to provide for extra schools does not apply to the local area where supply of additional primary school places is not required. The Council has in the past used previous alleged breaches of promises not to increase the school roll as grounds for dismissal such as with Devonshire House (*2015/1635/P*) and it should be able to do so with Heathside School.

The school is proposing to move its Year 6 classes into Jack Straw's Castle which it states would be 70 students apparently. Yet, there appear to be 8 classrooms? The floor space of 495sqm would indicate that many more could be put in if Heathside Enterprises Ltd saw fit (current requirements ask for 50sqm per 30 students, so it could

go as high as 250 students). Heathside been the most successful local school in being able to increase its pupil numbers seemingly in the face of planning restrictions and this site is likely to be no exception. Once again it is promising not to increase pupil numbers, it is merely “decanting” from recently rented out unsuitable premises, which OFSTED has deemed “unsafe” (*OFSTED inspection no. 10078946*).

The rapid expansion of Heathside Enterprises Ltd in Hampstead ward from 133 in 2007 to 552 in 2019 have caused misery to residents. Parts of the Heath close to the school which is meant to be enjoyed by the general public are dominated by the school treating it as a playground. It is no longer safe to walk along the north end of Heath Street during school drop off and pick up times, it is no longer safe to walk along New End and the White Bear during these times, will it now to longer be safe to use the main public bus stops at the Whitestone Pond junctions?

Please reject this flimsy application and put residents' considerations and pedestrian safety first.