

David Fowler  
Planning Officer  
Camden Council  
5 Pancras Square  
London N1C 4AG

9 June 2019

Dear Mr Fowler

### Planning Application 2019/2375/P - Conversion of Hampstead Police Station into a Free School

I am writing on behalf of the Church Row Association to object to the above planning application to convert Hampstead Police Station into a Free School with a Belize catchment area.

#### School Cost

The Skills Funding Agency bought the site for £14 million in 2014. Only 24 free school sites bought since 2011 have exceeded £10 million. As a grade two listed building there will be substantial extra cost involved in transforming the building into a school. The total estimated cost of £20 million will make it one of the most expensive free primary schools ever built in the United Kingdom.

#### No need for additional places

In and around Hampstead and Belsize Park, there are already over 650 more primary school places than pupils. The DoE's figures (below) show a declining need for primary education in Belsize. Frogna and Fitzjohn's, Hampstead Town and Haverstock show similar projected declines. Over the next decade, this oversupply of school places will double as forecasted demand drops (2018 Annual School Places Planning Process Report, Camden Council). The school currently only has 103 pupils and not the proposed 210. Existing local government schools (e.g. Rosary Catholic School which takes Catholic and non-Catholic children from a catchment area that includes Hampstead and Belsize Park) are justifiably concerned that the new school will have a negative impact on their pupil roll and funding.

GLA 2015-based Interim Projections 'Camden'																
Source: GLA Intelligence, © 2017																
Ward Code	Borough	Ward Name	Sex	Age	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Ward population Summary: 4-10 year olds																
E05000128		Belsize	P	4-10	1,415	1,406	1,385	1,341	1,305	1,282	1,247	1,216	1,193	1,171	1,150	1,129
E05000129		Bloomsbury	P	4-10	304	296	290	293	287	288	289	295	296	299	301	303
E05000130		Camden Town with Primrose Hill	P	4-10	746	743	750	752	749	751	758	759	760	762	763	761
E05000131		Cantelowes	P	4-10	1,011	1,019	1,021	1,006	1,015	1,020	1,030	1,028	1,033	1,040	1,043	1,042
E05000132		Fortune Green	P	4-10	1,013	1,014	1,016	1,004	990	975	972	965	957	950	942	933
E05000133		Frogna and Fitzjohns	P	4-10	1,200	1,192	1,186	1,182	1,169	1,159	1,155	1,144	1,139	1,134	1,128	1,122
E05000134		Gospel Oak	P	4-10	1,093	1,121	1,132	1,121	1,108	1,093	1,095	1,082	1,072	1,061	1,049	1,032
E05000135		Hampstead Town	P	4-10	1,098	1,088	1,060	1,027	994	977	962	951	939	927	916	905
E05000136		Haverstock	P	4-10	1,192	1,183	1,178	1,152	1,129	1,112	1,112	1,096	1,087	1,078	1,068	1,058
E05000137		Highgate	P	4-10	852	843	832	832	815	798	787	773	762	752	741	731
E05000138		Holborn and Covent Garden	P	4-10	710	704	706	702	697	704	716	723	731	739	745	749
E05000139		Kentish Town	P	4-10	955	953	937	932	940	964	992	1,016	1,034	1,055	1,074	1,095
E05000140		Kilburn	P	4-10	1,112	1,133	1,144	1,153	1,145	1,141	1,137	1,137	1,137	1,136	1,134	1,130
E05000141		King's Cross	P	4-10	682	682	669	662	658	661	668	676	681	687	693	699
E05000142		Regent's Park	P	4-10	965	971	979	991	992	992	1,008	1,019	1,025	1,079	1,133	1,196
E05000143		St Pancras and Somers Town	P	4-10	1,531	1,566	1,611	1,697	1,759	1,846	1,929	2,007	2,083	2,156	2,226	2,279
E05000144		Swiss Cottage	P	4-10	1,211	1,221	1,224	1,219	1,203	1,193	1,178	1,177	1,168	1,160	1,150	1,140
E05000145		West Hampstead	P	4-10	726	742	744	740	741	750	760	766	776	781	785	787
Camden (sum of wards)					17,817	17,878	17,864	17,806	17,695	17,707	17,794	17,832	17,872	17,968	18,040	18,091

## The Location

Although the proposed school is a Free Local School it is proposed to be built in Hampstead NW3 outside of its Belsize catchment area location. NW3 already has 42 schools and more than 12,500 pupils (see Appendix 1) giving it the highest concentration of schools in Europe. Not surprisingly local residents and existing schools are not supportive of an addition of another school. The school is being located in an area that already has far too many.

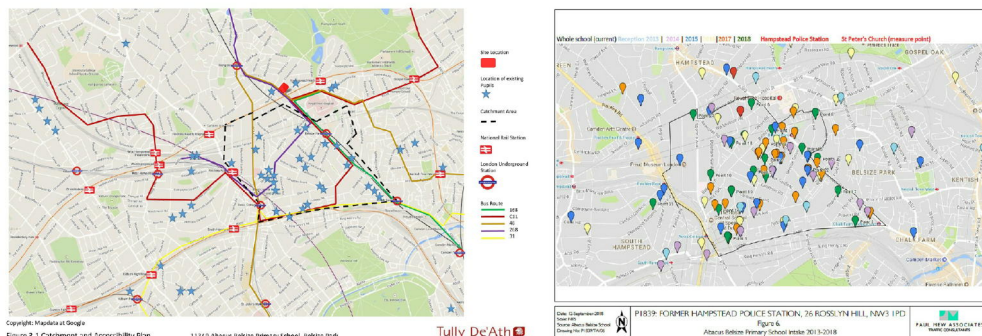
## Pupil Location v Catchment Area

Much is made by the applicant of the proximity of the catchment area to Downshire Hill. This needs to be seen as a theoretical exercise as Abacus School's catchment area and the location of Abacus pupils are not the same. A significant proportion of the pupils don't come from the catchment area and/or have no obvious public transport to get them to the proposed new school and live far too far away to walk.

The map shown below left, from the 2016 application papers, shows the location of pupils being spread from: Cricklewood to Kilburn; and from Hendon Way to Regents Park. Twenty-three of the fifty pupils were outside the catchment area.

The map shown below right, shows the 2018 location of pupils being spread from: West Hampstead to Kentish Town; from Swiss Cottage to Gospel Oak; and from Chalk Farm to Swiss Cottage. Thirty-one of the one-hundred and seven pupils were outside the catchment area.

As noted above, one hundred and three of the proposed two hundred pupils currently don't exist, and so they could be from anywhere.



## Travel Plans

It is admirable that Abacus school has a travel plan and a car free ethos that targets zero use of cars. However, there is a big difference between targets and reality, as targets are not enforceable on pupils, and in reality, many of the pupils don't come from the assumed catchment area. Furthermore, any study of the actual location of the pupils: and the available public transport shows that it's very difficult for pupils with heavy bags, musical instruments, and London's unpredictable weather without resorting to a car.

The reality is that existing transport infrastructure struggles to deliver more than 12,500 pupils to 53 schools in NW3, with the result that there is a very substantial school run. Whilst Hampstead is well serviced by a tube into the centre of London, travel across North London is not well serviced by public transport. The 168 bus is the only bus that directly links Belsize Park and its surrounding to Rosslyn Hill, and there are just four buses per hour, each with 29 seats. These same four buses are supposed to accommodate the new school's 210 pupils?

Hampstead's New End School also strongly discourages car use. Despite all their good efforts, the school has significant issues with parents driving their children to school. A recent show of hands in a Camden Council

initiated meeting at New End, disclosed that about 25% of parents regularly drive to or from school – and this is a school which serves local residents.

The implication of having the School Travel Plan secured as a condition of any future planning appears to be that if the school doesn't meet its target then it can't have any future planning application approved. This is a charade, as the probability of Abacus achieving its targeted zero use of cars is next to zero. Furthermore, for the property to never have any prospect of ever having future planning applications approved would be against the principles of the National Planning Policy Framework.

### **Camden Council Planning Policy for Schools & Traffic**

Clause 4.33 of the Camden Local Plan states “*The scale and intensity of use of some community facilities, such as schools, colleges and higher education facilities can lead to adverse impacts on residential amenity. This is principally related to the movement of large numbers of people at certain times of day, impacts such as noise and air pollution and the pressure on the transport system. The Council will ensure schemes satisfactorily address the impacts of changes to the balance and mix of uses in the area, including the cumulative impact of schemes with planning permission or awaiting determination. Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the ‘school run’. We will refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase*”. The proposed school will inevitably increase the traffic in NW3 and is contrary to Clause 4.33 of the Camden Local Plan. The application should be refused.

### **Pollution**

As a result of the schools and the school run, NW3 has also has the highest levels of pollution in the Borough of Camden. The data set out below is from the schools monitoring project conducted in spring 2017 over a four-month period by Camden Air action and Camden Council. It shows the NO<sub>2</sub> pollution outside many NW3 schools breaching the 40 µg/m<sup>3</sup> UK and EU legal limit. Anything above 20 µg/m<sup>3</sup> is considered harmful.

<b>School</b>	<b>Street</b>	<b>NO<sub>2</sub> Level µg/m<sup>3</sup></b>
Hampstead Hill School	St Stephen's Hall, Pond Street, NW3 2PP	57
St Mary's School	47 Fitzjohn's Ave, London NW3 6PG	55
Devonshire House Upper & Early Years	2 Arkwright Road, London NW3 6AE	50
Fitzjohn's Primary	86A Fitzjohn's Ave, London NW3 6NP	50
St Anthony's Junior	90 Fitzjohn Avenue, London NW3 6NP	50
Rosary Primary School (RC)	238 Haverstock Hill, London NW3 2AE	44
St Anthony's School Seniors	1 Arkwright Rd, London NW3 6AA	42
North Bridge House Nursery School	33 Fitzjohn's Avenue, London NW3 6NT	42
Devonshire House Juniors	69 Fitzjohn's Avenue, London NW3 6PD	40
UCS Pre-Prep	36 College Crescent, London NW3 5LF	39
Holy Trinity Primary (CE)	Maresfield Gardens, London NW3 5SQ	39
The Academy School	3 Pilgrim's Place, London NW3 1NG	38
South Hampstead High School	3 Maresfield Gardens, London NW3 5SS	36
North Bridge House Pre-Prep	8 Netherhall Gardens, London NW3 5RR	35
UCS Seniors	Frognal, London NW3 6XH	34
Southbank International	16 Netherhall Gardens, London NW3 5TH	32
The Hall School Juniors	69 Belsize Park, London NW3 4EH	32
New End Primary School	Streatley Place, London NW3 1HU	31
Hampstead Parochial Primary (CE)	2A Holly Bush Vale, London NW3 6TX	30
North Bridge House Seniors	65 Rosslyn Hill, London NW3 5UD	29
Heathside Preparatory	84-86 West Heath Road, NW3 7UN	29
St Christopher's School	32 Belsize Lane, London NW3 5AE	28
South Hampstead Juniors	5 Netherhall Gardens, London NW3 5RN	28
Maria Monetessori	26 Lyndhurst Gardens, London NW3 5NW	27
Lyndhurst House Prep	24 Lyndhurst Gardens, London NW3 5NW	27
UCS Juniors	11 Holly Hill, London NW3 6QN	26
Gloucester House	33 Daleham Gardens, London NW3 5BU	25
Christ Church Primary (CE)	Christchurch Hill, London NW3 1JH	24

Rosslyn Hill is a very busy street with significant traffic and pollution issues. An air quality study carried out by the Hampstead Neighbourhood Forum<sup>1</sup> found that outside the Hampstead Police Station the NO<sub>2</sub> levels to be 56 µg/m<sup>3</sup> exceeding the legal limit of 40 µg/m<sup>3</sup>. The application acknowledges the pollution issues in Rosslyn Hill as it states that in order to meet Air Quality Objective for NO<sub>2</sub> inside the building mechanical ventilation will be installed. However, the application seems oblivious to the implications of the expectations of requiring pupils to walk to school on Rosslyn Hill.

Because of the harmful effect of air pollution on children, the National Institute for Clinical Excellence has called for no new schools to be built on main roads.

Camden's Local Plan Policy CC4 on Air quality seeks to ensure that sensitive uses (e.g. housing and schools) are not located in areas of existing poor air quality unless acceptable mitigation measures are included. The external pollution hasn't been mitigated. The application should be refused.

Clause 5.3.10 of London Plan 2017 states that "*Education facilities should be located away from busy roads, with traffic calming at entrances, to benefit from reduced levels of air pollution, noise and road danger*". The application should be refused.

The area has been an Air Quality Management Area (AQMA) since the year 2000. The European Air Quality Directive 2008/50/EC requires UK authorities to refuse permission for a development where it will either make significantly worse an existing breach or significantly delay the achievement of compliance with pollution limit values. The approval of this planning application would make it harder for the Camden Council to deal with the school run and remedy the AQMA. The Treaty of European Union Art 4 (3) requires UK authorities to refrain from actions, which will prejudice fulfilment of EU law obligations. The application should be refused.

#### **Affordable Housing**

The London Plan 2017, and in particular policy H5, seeks to prioritise affordable housing. Similarly, Camden's Local Plan policy H4 seeks to maximise the supply of affordable housing. Given the number of schools in the area and the presence of the Royal Free Hospital, affordable housing is in dire need for teaching staff and hospital workers. The appropriate use for the building is affordable housing. Granting this application will result in a further over concentration of schools in NW3; and will deny Camden the possibility of converting the building to affordable housing. The application should be refused.

#### **Conclusion**

For all of the above reasons, the planning application should be refused.

Yours sincerely



David Milne  
Church Row Association

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<sup>1</sup> <http://www.hampsteadforum.org/airtest>



# NW3 SCHOOL AND PUPILS

# APPENDIX 1

NW3 SCHOOLS	URN	Age	May-17 Pupil Numbers	Report Date	Feb-15 Pupil Numbers	Feb-07 Pupil Numbers	Comments
1 Devonshire House Preparatory School	397203 Private	2-13	677	Dec-16	647	469	The figures are from the 2014 and 2007 ISI Reports
2 Fitzjohn's Primary School	100026 Community School	3-11	232	Feb-17	231	234	The figures are from the 2007 and 2014 Ofsted reports
3 Hampstead Parochial Church of England Primary School	100031 Voluntary Aided School	2-11	229	May-17	200	206	Ofsted reports 2004 (206) 2008 (206) 2012 (200)
4 North Bridge House Nursery School	100071 Independent School	2-6	226	May-17	213	178	Ofsted Nursery 2010 (139 - 74) 2007 (98-80)
5 North Bridge House School	100068 Independent School	5-7	210	OFSTED Web	184	194	Ofsted 2010 (184) 2007 (194)
6 North Bridge House Prep School	135140 Independent School	8-13	490	OFSTED Web	289	280	Ofsted 2011 (289) 2008 (280)
7 North Bridge House Senior School	100074 Independent School	11-16	323	OFSTED Web	200	180	Ofsted 2010 (200) and 2007 (180)
8 Royal School Hampstead	-	3-16	-	-	37	37	The Royal School Hampstead, was an independent girls' school (3.16).
9 South Hampstead High School	2026307 Independent School	4-18	913	ISI	902	825	The school merged with North Bridge House in 2012 - Ofsted (2005)
10 St Anthony's Preparatory School	2026181 Independent School	4-13	301	ISI	286	269	Web search, ISI 2009 (286) Catholic Church 2011 (286)
11 St Mary's School	2026084 Independent School	2-11	302	ISI	302	294	Church Report 2008 (294) ISI Report 2013 (302)
12 University College School - Junior School	2026018 Independent School	7-11	234	ISI	231	234	ISI Web (231) ISI 2011 (234) figures not available for earlier
13 University College School - Senior School	2026018 Independent School	11-18	845	ISI	855	845	ISI Web (855) ISI 2011 (845) figures not available for earlier
14 Abacus Belzize Primary School (new)	139837 Academy Free School	4-11	5002	May-17	4,397	4,205	Opened Sep 2013, the figure of 30 for 2015 is from their web site
15 Cetti Key Stage 4 School	100006 Pupil Referral Unit	11-16	27	OFSTED Web	30	-	Figure is from an Ofsted Report dated 25 April 2014.
16 Christ Church Primary School, Hampstead	100028 Voluntary Aided School	4-11	181	May-17	183	181	The figures are from the 2014 and 2009 Ofsted Reports
17 Fine Arts College	100084 Private	13-19	200	May-17	126	95	The figures are from the 2005 and 2012 Ofsted reports
18 Fleet Primary School	100014 Community School	3-11	225	May-17	234	235	The figures are from the 2007 and 2012 Ofsted reports
19 Gloucester House the Tavistock Children's Day Unit	135167 Independent Special School	5-12	13	May-17	7	-	The figure is from the 2014 Ofsted report. The school was opened in 2007
20 Gospel Oak Primary School	100025 Maintained	3-11	471	May-17	472	465	The figures are from the 2005 and 2011 Ofsted reports
21 Hampstead Hill School	100073 Independent School	2-8	377	May-17	271	268	The figures are from the 2005 and 2014 Ofsted reports
22 Haverstock School	100049 Community School	11-18	1227	May-17	1,284	1,092	Ofsted Reports 2011 (1284) 2008 (1234) 2004 (1092)
23 Heathside Preparatory School	100078 Independent School	3-11	369	May-17	281	109	ISI Report 2007 (109) Ofsted Report 2014 (281)
24 Hereward House School	2026179 Independent School	5-12	170	Feb-16	177	166	ISI Web site (177) and ISI Report 2010 (166)
25 Holy Trinity CoE Primary School, NW3	100032 Voluntary Aided School	4-11	186	May-17	187	167	Ofsted reports 2003 (171) 2008 (167) 2013 (187)
26 Lyndhurst House Preparatory School	2026210 Independent School	4-13	168	Oct-16	168	153	ISIC Web (168) ISI 2010 (153) - No other figures available
27 Maria Montessori School	131978 Independent School	3-12	202	May-17	216	117	Ofsted 2008 (117) 2014 (216)
28 New End Primary School	100019 Community School	3-11	441	May-17	434	401	Ofsted 2012 (434) 2007 (401)
29 Rosary Roman Catholic Primary School	100035 Voluntary Aided School	3-11	338	May-17	354	345	Ofsted 2012 (354) 2008 (345)
30 Sarum Hall School	2026016 Independent School	3-11	181	May-16	170	168	Sarum Hall web site, ISI - 2010 (168) - No other figures available
32 St Christopher's School	100542 Independent School	3-11	206	May-16	197	197	Good schools guide - as reports seem to be about safeguarding issues
33 St Luke's Church of England Primary	2026013 Independent School	4-11	237	May-13	237	237	ISI Report 2013 (237) Further info not available
34 St Margaret's School	136807 Free School	4-11	77	OFSTED Web	30	-	Ofsted 2013 (30) School opened in 2011
35 St Paul's Church of England Primary School	2026104 Independent School	4-16	156	May-17	156	156	ISA, 2014 (156) No prior figures available
36 The Academy School	100046 Voluntary Aided School	4-11	210	May-17	207	202	Ofsted 2011 (207) 2009 (202)
37 The Hall School	131291 Independent School	6-14	89	May-17	90	71	Web site (90) Ofsted 2009 (80) 2007 (71)
38 UCS Pre Prep (Formerly Phoenix School)	2026017 Independent School	5-13	452	Oct-16	461	451	ISI Web (461) ISI 2010 (451) Previous report was 2004 but not available
39 The UCL Academy	100045 Independent School	3-7	123	ISI	126	114	Ofsted 2014 (126) ISI 2006 (114) Going forward is part of UCS
40 The Village School	137181 Academy	11-18	835	May-17	535	-	Opened in 2012 sponsored by UCS
41 Trevor-Roberts School	2026295 Independent School	4-13	166	May-17	97	98	Ofsted 2012 (97) Ofsted 2007 (98)
42 Royal Free Hospital Children's School	100094 Community Special School	5-16	150	Nov-16	173	169	Web site (173) ISI 2010 (173) ISI 2006 (169)
				May-17	23	6	
			11,546			9,868	

Note: Figures don't include nurseries of which there are at least 36 with more than 700 children on the roll (see next sheet).