

Date: 10th June 2019



Supporting People Directorate

Post only:
London Borough of Camden
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By email

Dear David

The Supporting People Directorate/ School Places Planning response to application reference: 2019/2375/P. Change of use of the site from a police station (sui generis) to a one-form entry school (Use Class D1) for 210 pupils and business/enterprise space (Class B1) including alterations and extensions to the rear and associated works. Abacus Belsize Primary School.

I am submitting this letter in my capacity as London Borough of Camden's Director of Education in the Supporting People Directorate, to the Council in its separate and independent capacity as local planning authority tasked with determining the planning application referenced **2019/2375/P ("the Application")**.

Officers in my team have reviewed the Application.

In carrying out that review, we have had regard to local and national planning policy including Paragraph 72 of the National Planning Policy Framework which inter alia states that 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 and that Councils should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

Against this backdrop of central government support for widening choice of school places, the Council as Local Education Authority ("LEA") considers that it must, for the reasons set out below, object to this planning application. Furthermore, the LEA requests that a condition limiting the school to a 1 form of entry school is attached to any planning permission issued by the local planning authority.

It is important that the LEA sets out the context for this. Our reasoning is Abacus Belsize Primary School at one form of entry (1FE), was originally intended and accounted for in our local authority school places planning assumptions. However, I would also like to put on record that the education landscape in Camden, and across London, has changed considerably over recent years in a way that was not forecast by the Greater London Authority (GLA). This has led to a rapidly increasing surplus of school places in reception due to the falling actual registered births, but also potentially underlying local demographic changes. In spring 2016, when the original Abacus planning application was submitted,

Camden borough reception surplus was 3% (2015/16), compared to 17% (2018/19). Based on the Department for Education January School Census, the surplus is expected to rise further and Camden is taking action to address this within our family of schools. Due to this rising surplus, the LEA would very strongly challenge any move by the Abacus Belsize to increase the size of their school above 1FE.

The proposed permanent site of the Abacus Belsize Primary School is located within Hampstead Town ward and planning area 1 (PA1) for the purposes of school place planning. However, it is possible that children attending the new school could live in the Belsize ward area, situated within planning area 3 (PA3), based on the admission criteria/catchment area, plus small areas of surrounding wards. The proposed school site is also located close to Highgate ward and planning area 2 (PA2). In order to provide a detailed response to the application we have therefore considered the need for school places based on the new school site location, and school catchment area and surrounding planning areas: PA1, PA2, PA3, and PA4. Borough information is included for context. **Appendix A** shows school planning areas in Camden, including levels of surplus based on 2018/19 DfE January School Census.

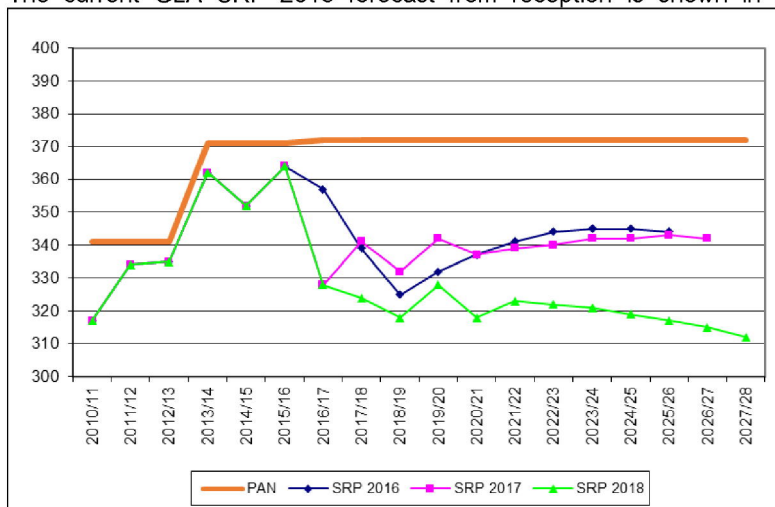
The authority, in its role as commissioner of new school places, has a statutory duty to ensure that there are sufficient school places in the borough for every child who wants one, while school places capacity is reviewed annually for the current year and projecting forward. This is a cyclical process whereby our report is produced annually, compiling and explaining all the relevant data regarding school place planning, to inform decision-making around school capacity and school places. The report identifies capacity and pressures within the borough, projected future demand and any likely impact of changes in neighbouring boroughs.

The current 2018 Annual School Places Planning report covers the school planning period up to 2027/28. It includes Greater London Authority (GLA) 2018 (2015 based) population projections (PP), GLA 2018 school roll projections (SRP), the Council's 2018 projected housing development trajectory and additional child yield anticipated as a consequence, plus actual need through offers and rolls data. The 2018 report can be viewed by following this link [SPP report 2018](#).

At primary, 2018 reporting concluded, having analysed all the data listed above, with all new provision provided in recent years, that we anticipate there should be sufficient school places in Camden, and in all localised planning areas 1-5 over the whole planning period to 2027/28. However, it was raised that the increasing surplus may need to be addressed in some areas of the borough.

These 2018 GLA school roll forecasts anticipated the following surplus from reception by 2027/28, with all existing expansions included fully: PA1; 2.2FE, PA2; 2.3FE, PA3; 2FE, PA4; 0FE, and Borough; 6.6FE. As actual registered births have fallen further in 2017, to their lowest level since the late 1990s, it is anticipated 2019 GLA forecasts will reduce further because of this.

The current GLA SRP 2018 forecast from reception is shown in figure 1 for PA3.



In PA3, which includes the majority of the school catchment area, the GLA SRP 2018 (green) forecast shows a rising surplus to 2027/28, plus the higher GLA forecasts before an adjustment from 2018 due to an ONS error.

Rising school surplus in recent years has been closely monitored in Camden through annual reporting, and following the actual registered birth fall in 2013, through to the recent low 2017 figure. The Office for National Statistics (ONS) made an error resulting in inflated migration data particularly impacting cities such as London, the GLA identified this error in 2018, leading to future GLA forecasts being lower than previous years. Lower actual school rolls and GLA forecasts are a London-wide issue, with many surrounding authorities reducing their school admission numbers to reduce existing borough reception surplus.

Levels of reception primary surplus percentages and actual school places vary across the borough in 2018/19 from the January 2019 DfE School Census: PA1; 7% (+28 excluding 1FE Kingsgate), PA2; 15% (+62), PA3; 12% (+43), PA4; 32% (+124), and Borough; 17% (+292 excluding 1FE Kingsgate). Abacus Belsize was full at reception in 2018/19. **Appendix A** provides this information within a map. **Appendix B** has been included for primary, showing historic trends to 2012/13, the year before Abacus Belsize was established.

Evidence suggests little or no impact of Abacus Belsize remaining at 1FE and moving to the Hampstead site, with the catchment area remaining primarily within Belsize ward, including small parts of surrounding wards. GLA school roll forecasts and Camden annual school places planning fully account for Abacus as 1FE, as the school is already operating from a temporary location in southern Camden and away from its catchment area. The impact of Abacus on Camden primary schools is unlikely to change from our existing planning - although there is a rising surplus within the borough from reception, which is unlikely to reduce in the short term with the latest low actual resident births from 2017. The current 2018/19 current Abacus Belsize reception cohort are Camden residents: 57% Belsize ward, 40% in wards surrounding Belsize, which could include pupils within the catchment area, with only 3% located further away. Impact to other Camden primary

schools could occur if this roll pattern were to change considerably in the future, i.e. if the school were to recruit their roll from further afield. If school roll patterns at Abacus Belsize were to change, it could impact community schools with higher reception surplus from 2018/19 disproportionately in surrounding areas as shown in **Appendices A and B**: New End 37% (PA1), Carlton 53% (PA2), Fleet 13% (PA2), and Rhyl 33% (PA3).

In summer 2018 a 'deep dive' analysis of school places was commissioned in Camden, following the fall in actual registered births, and lower GLA school roll forecasts than actual school rolls. Analysis unpicked existing data to further understand the changing environment, and potential reasons behind changing demographics on the ground. Primarily, the reason behind the fall in Camden school places was the drop in actual registered births, and Camden's low fertility rate (lowest in London/England). However, other factors, including property use change, i.e. empty properties and short term property lets, could be impacting. Also, HS2 and Brexit cannot be ignored.

The 'deep dive' analysis made a series of short term recommendations to temporarily reduce admission numbers, across the borough - although only one school, Rhyl within PA3, agreed to reduce PAN from 2FE to 1FE from 2019/20. St Aloysius already decided to reduce PAN from 2FE to 1FE in 2019/20 and the school is now consulting on full closure. An ongoing school estate review will report in the coming months presenting strategic recommendations to inform longer term school reorganisation, and estate strategy, including SEND and Early Years Strategy.

All concerns over increasing surplus places, by planning area and overall, will be reviewed once our annual report is revised in 2019, as will GLA forecasts.

In summary, the LEA cannot support the proposal in planning application 2019/2375/P for Abacus Belsize Primary School unless a condition limiting the school as a 1FE only is attached. The school is already accounted for within annual school places planning provision as 1FE of school places. Based on their existing catchment area, this application reflects no change to forecasting expectations. Consideration must though be given to rising surplus primary schools places in Camden, requiring action through temporary PAN reductions, and already resulting in the potential closure of relatively nearby (to current temporary Abacus catchment) PA4 St Aloysius Primary School 2FE, if this is decided following consultation. There continues to be no evidence demonstrating a need for any additional primary provision over the reporting period to 2027/28. Any additional school places provided at primary would reduce the number of pupils in existing Camden provision and create further vacancies in the system, as evidenced in our 2018 annual report, and this would be challenged very strongly by the LEA. Abacus Primary School is an academy (Free Schools are academies) and so controls its own admissions.

In summary, the Council objects to this application because while a planning condition limiting the school's expansion to one form of entry is the only mechanism at the Council's disposal to protect other Camden schools from any increase in numbers to admit that the school may make in future years, it still cannot be guaranteed to mitigate the impact that the creation of a new school in this location would have on surrounding schools.

The Council also believes that despite the school's efforts to minimise traffic at drop off and pick up times, an expansion to two forms of entry, were it to happen in the future, would create further congestion in a local area that is very over-congested at these times.

Yours sincerely



Director of Education Commissioning

Appendix C - Additional Camden comments specific to the Abacus Belsize planning statement:

(6.4), Abacus Belsize is full from reception, yes, however there is plenty of choice in other local Camden primary schools above 5-10% surplus which we aim towards.

Principle of educational use- LBC commented on the need for the proposed development given the number of primary schools within the Belsize Park Ward. It was outlined that there was significant demand for Abacus Belsize Primary School even in its current temporary location, with an oversubscription for places and the need to provide choice in education provision for parents;

(6.24) Given the falling rolls in Camden primary schools following lower births, a limiting 1FE condition would be essential, so as not to impact existing schools.

Planning Obligations to be secured through a s106 legal agreement – Limiting pupil numbers to 210;

(10.3) There is already sufficient choice of school places as raised in this letter, there are currently schools with high surplus, not in Belsize, but very close to local area (as Appendix B illustrates).

The school provides choice for the Belsize residents to send their child to a secular school. This is supported by Paragraph 94 of the NPPF which highlights the importance of communities being given sufficient choice of school places. Great weight needs to be attributed in the decision-making process to the contribution that the proposed scheme would make towards creating a permanent home for the school.

(10.5) Yes, Abacus Belsize is already included in our planning, but school numbers have fallen significantly over recent years, and actual births/forecasts don't indicate any improvement for the foreseeable future.

In LBC's 2018 Annual School Places Planning Process Report; Abacus Belsize Primary School is supported as a 1FE school and modelled within capacity of pupil places in the LBC. Therefore, the granting of this application will enable the school to continue serving the demand of the borough.

(11.2) There is sufficient choice at good and outstanding schools in the borough and close to catchment area, even excluding Abacus Belsize.

This proposal provides a permanent site for Abacus Belsize Primary School which raises education standards and widens choice. Paragraph 94 of the NPPF sets out "It is important 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".