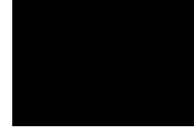


David Fowler
Planning Officer
Camden Council
5 Pancras Square
London
N1C 4AG



3 July 2019

Dear Mr Fowler

**Planning Application 2019/2375/P
Conversion of Hampstead Police Station (HPS) for Abacus Belsize Free School**

I am writing to Object to the above Planning Application.

I write as a Hampstead resident with first-hand experience of living 200m from two state primary schools.

I write as an ex-Governor and head of Finance committee of a Hampstead state primary school with first-hand experience of the financial circumstances of state schools.

Most importantly I write as a [REDACTED] who have been through / are in / and will be going to a Hampstead state primary school.

There are many reasons to object to Abacus being location at HPS. I outline the most critical ones below.

None of the arguments for the existence of Abacus apply to the specific HPS location

Arguments for Abacus have shifted significantly over time.

The original arguments for the setting up of Abacus Belsize were (summarised from the original application)

- There was a need for a secular primary school in Belsize Park
- There was a need for new school places

Since then circumstances have dramatically changed, as I summarise in sections below, and the arguments advanced for the school by the Trust, by the school and its supporters are now quite different:

- Belsize needs a good primary school because other schools aren't good enough (as stated in the 29 January meeting). Abacus is a good school and it is therefore implied that approval should be granted.
- The police station is empty and should be used. It is therefore implied that approval should be granted
- The argument that Belsize needs a secular primary continues to be put

HPS is not in Belsize Park and is not in the catchment area for Abacus school. All the above arguments are false arguments for planning to be approved in the specific location of the HPS. I have expanded on these issues and on other issues below.

No need for a secular school

There is no need for a secular school in the specific location of the HPS. HPS is 15 mins walk (using Google) from St Peters church which is the measuring point for Abacus. However, there are nearly 200 annual places at secular state primary schools 13-24 minutes walk away from the same measuring point.

Fitzjohn's	13 minutes
Abacus @ HPS	15 minutes
Fleet	18 minutes
New End	21 minutes
Gospel Oak	22 minutes
Rhyl	24 minutes

Fitzjohn's, Fleet, New End and Rhyl all have spaces to fill today. And this is before the significant drop of pupil numbers expected over the coming years. An extra 9-minute walk cannot be justification for a new secular school, especially when there is no need for new primary places.

No need for new Primary Places

There is no need for additional primary school capacity in North Camden. The numbers summarised below come from Camden's public School Forum data and show the surplus capacity in each planning area in North Camden:

	PA1	PA2	PA3	Total
2018/19	156	282	240	678
2022/23	289	402	350	1,041
2027/28	426	434	394	1,254

Note:

- PA1 (Planning Area 1 - includes Hampstead and the HPS site), PA2 (neighbouring - includes Gospel Oak) and PA3 (includes Belsize Park and the Abacus catchment area)
- the above includes the additional permanent places available at Kingsgate should as they exist even if not being currently used
- the above includes Abacus. Even excluding Abacus the surplus capacity is still very significant.

In summary all planning areas in North Camden have surplus capacity today of the equivalent of 3 single form entry schools combined. Demographic projections show that in all North Camden planning areas combined surplus capacity will double in the next 8 years to the equivalent of 6 single form entry schools

It is noticeable that the Trust running the school now says there is no "Basic need" for places (said in 29 January public meeting). This is polar opposite from the original application and shows the Trust recognises the reality of changed circumstances.

Abacus itself demonstrates the lack of need. At May 18 it had 120 pupils compared to 150 places (years 4-6 hadn't been filled in May 2018). At 80% full that is at the lower end of % full for all local primary schools. If there is such demand why is Abacus not full?

The area already has numerous primary schools with “Good” or “Outstanding” ratings

The area is in the very privileged position of having an abundance of Good and Outstanding schools. There are 13 good or outstanding schools within a 27 minute walk of the Abacus measuring point (see below).

There is no need for a new school to drive up standards which are already high.

School	Mins	OFSTED	
Holy Trinity	8	Good	Please note: Black = Secular Blue = CoE or Catholic
The Rosary	10	Good	
Fitzjohns	13	Good	
Abacus @ HPS	15	Outstanding	
St Pauls	15	Good	
Fleet	18	Good	
St Dominics	19	Good	
Hampstead Parochial	19	Good	
New End	21	Good	
Gospel Oak	22	Outstanding	
Rhyl	24	Good	
Carlton	25	Good	
Christ Church NW3	26	Outstanding	
Holy Trinity & St Silas	27	Outstanding	

Abacus would materially damage these existing Hampstead primary schools

The context of the financial situation of state schools is that :

- Revenue has been held flat (no inflation) for a number of years
- Additional costs such as National Insurance, Pension contributions and staff salary increases have been passed on to schools
- As a result there has been a significant real terms cut to school budgets which are now stretched

As described above schools are now grappling with a future of falling pupil numbers. This will not affect all schools equally but as a whole there will be a real impact. Funding is directly linked by formula to the number of pupils – each time a place is unfilled a schools funding reduces by approximately £3600.

If Abacus is located in HPS then there will be a further financial impact on schools. The 210 places at Abacus is £750k of lost funding for other schools. As described above nearly every single primary is rated good or outstanding – there are no failing schools from an educational standards perspective.

It will be the vulnerable pupils who are hit first. As funding decreases the first resource to go will be the teachers not dedicated to a class – special needs and deputy head positions will be at risk. Schools will find it harder to support SEN, they will have less resilience to deal with issues and in extremis they may be forced to close.

St Aloysius Primary School is a concrete example of the impact already being felt. This is not theoretical:

- St Aloysius is in consultation to close by the end of the year
- Kings Cross Academy opened in September 2015 as a 2 form entry school. In the 2 years before it opened St Aloysius had 59 (Jan 14) and 56 (Jan 15) pupils in reception. It was almost filling its reception classes. In the 3 years after Kings Cross Academy opened the numbers were 53 (Jan 16), 43 (Jan 17), 32 (Jan 18). Kings Cross Academy and St Aloysius schools are 16 min walk apart.
- St Aloysius is therefore a concrete example of the damaging impact of falling pupil numbers and of a free school / academy opening nearby

Kingsgate Primary school is another concrete example. It was expanded to create more places. Pupil numbers then declined. One of the main reasons given was the opening of a new free school nearby, although not in Camden Borough. As a result the schools intake has been reduced.

Yet Abacus would be treated comparatively unfairly, further damaging other schools

Going ahead on the current basis would treat Abacus in a biased way compared to other schools.

The building was acquired with the intention of creating a 2 form entry school. As a result it is obvious the building is far too large. This results in two significant advantages for Abacus over and above other local schools.

- **Over-sized**

After the police house is sold and the space carved off for the business centre the school will have approx. 17,000-18,000 sqft (confirmed at meeting on 25 March). As a comparison the school to which my children go has approx. 7,000 sqft for 196 children.

The normal guidance (Schedule of Accommodation tool) for free schools indicates a maximum of 14500.

Abacus will be treated very unfairly in having a disproportionate amount of space and facilities compared to other local schools.

- **Financially subsidised**

In the 29 January public meeting and again in the 25 March meeting it was confirmed that there would be a business centre created by carving off nearly 3200 sqft of space for a business centre. It was confirmed that the profit from this venture would go to the school.

In my work life I created a shared work concept in Borough. It is a sector I know well. Run well a space like this should generate £100-150k profit.

The annual budget for a 1 form entry school is approximately £1m so a subsidy of £150,000 is very significant. It's more than 3 additional teachers.

Overall, Abacus would damage other Hampstead schools and be treated unfairly itself with a subsidy insulating it from the financial pressures other schools face.

It's a poor use of £20m+ of taxpayers' money

The Hampstead Police Station was transferred to the DfE for £14m. An estimated £7m will be incurred on fitting out the building. Significant fees have been and will be incurred on top of this.

Hampstead is an expensive part of London and the area does not need more primary places. The average free school has cost (according to the NAO) £6.6m. More than 3 free schools could be built in areas of greater need.

Furthermore money recently incurred is already being mothballed.

- Kingsgate was expanded under Camden's Community Investment Programme but much of the school is now not used as it was capped at 3 form entry compared to 4 form capacity
- St Aloysius primary school is in consultation to close
- Consultations are ongoing across Camden to "cap" intakes to mitigate the demographic impact of falling numbers

The net result is that school capacity created and maintained at Camden's expense will be underutilised at the same time that £20m+ (DfE budget) of taxpayers' money is spent housing Abacus.

Negative impact on Pollution and Congestion

There are others who have submitted opinions and analyses who are much more qualified than I on the technical aspects of pollution. However, I do want to lodge my objection on pollution and congestion grounds based on my personal experience of living near two state primary schools.

Abacus says they will be a "car free" school. In my experience this is utterly implausible.

- Current Abacus parents know that presenting as a car free school is important for planning. There is no guarantee that current behaviour holds
- A school is a strategic long term decision, not just for "today". There is no guarantee that future parents will minimise car use
- The reality of state primary schools in Hampstead is one of significant car use by a minority of parents. Camden's own statistics show that 36% of parents on average across the Borough use a car.
- My own experience of living next to New End and Christ Church Schools is that whilst both schools strongly discourage car use it is a fact of life.
 - It causes significant tensions with local residents
 - It causes significant pollution as cars are left idle as kids are taken to the school gate
 - It causes significant congestion which in turn causes more pollution. Cars are literally left in the middle of the street whilst kids are taken to school which causes a backlog of cars and vans
 - The schools are **utterly powerless** to change behaviour beyond persuasion. There are no sanctions they can impose.
 - Wardens are also of no help given the 10 minute rule before a ticket is given
- As you will know from your colleagues Sam Margolis and Michelle Jamieson, Camden has recognised the issue with the Healthy Streets Initiative on roads near schools including New End which results in the drastic need to close New End during school opening and closing hours. Whilst beneficial it is a loss of amenity to local residents.

It is clear that the "car free" policy is very well intentioned and it may well reduce the amount of car use below the 36% Camden average. But it is nonsense to believe that parents will not drive their children to school. As people move home, are simply late on the day or simply ignore the schools preference for no car use, car use for a significant minority of parents will end up being a fact of life should the school go ahead.

In addition to the impact on traffic in school hours there will also be two further impacts that I believe have not been assessed in the application

- The school will let out its space after school hours. All schools do this and Abacus have a policy on letting which demonstrates their intention. Traffic movements will be created by the people who hire the school facilities. Vans will bring equipment to set up (eg for Childrens parties) as well as arrivals for people coming for such one off events.
- The school also has a business centre. Whilst I do not believe this will create traffic movements for the people working there given the lack of parking spaces there will be some additional pollution from deliveries, Amazon etc. There doesn't appear to be a Plan to manage this nor has the impact on pollution been calculated.

Overall the pollution generated by the application (the school and lettings in particular) pollution will exacerbate the already poor and illegal record of pollution in the Plan Area. It will significantly impact the Abacus children themselves as they walk up a busy very polluted road. It will increase traffic and congestion with a further impact on pollution.

Contravenes the Camden Plan

Section 4.33 of the Camden Plan states:

“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.** Policy A1 Managing the impact of development refers to how the Council will manage the impact of traffic movements. “

(My bold and underlining)

In preparing and approving the Camden Plan the issues raised by myself and others are officially recognised, It is beholden on Camden to apply their own policy and reject this plan. It is inconceivable that the “number of traffic movements” will not increase as a result of a 210 pupil school.

Contravenes the Draft London Plan

The draft London Plan requires new schools to be off main roads. A school in HPS clearly contravenes this.

Existing educational property should be evaluated

Priority should be given to evaluating existing school sites to house Abacus. As examples, St Aloysius is consulting to close. Kingsgate has surplus capacity. Numerous other primary and secondary schools are far from full.

By using an existing site or sharing existing facilities with another school :

- Significant taxpayers money would be saved
- Costs could be shared protecting the future of an existing school
- No planning change of use would be required
- Capacity would not be increased

HPS should be used to address planning needs identified for Hampstead

HPS is in Hampstead. It has been part of Hampstead Civic life for decades. It should be used to address planning needs identified for Hampstead.

If Abacus uses the building it will be of **zero benefit to Hampstead residents** – the catchment area for the school specifically excludes Hampstead. A child living next to HPS would be placed below a child living next to Chalk Farm tube.

And yet, as described above, the existence of Abacus will materially harm existing Hampstead schools.

There are many other community, commercial and affordable-residential uses that would benefit Hampstead, as a community, much more than another primary school.

HPS is empty purely because the DfE acquired the site 6 years ago and as a result other uses have had no chance to be explored.

Permission should not be granted purely because it is empty.

Finally, Abacus would be rejected as a new free school today

Under current requirements for new Free Schools the proposals for Abacus would not even be considered. I quote:

" to be approvable all applications must

- be in an area of low standards where there is a very strong case for a free school, which can be demonstrated by one or more of the examples set out in section B2; AND
- have demonstrable basic need for a high proportion of the school places that the free school will create.

If your proposal clearly does not meet the above criteria, it is unlikely to be assessed any further – regardless of the parental demand you are able to demonstrate for the school "

(My bold and italics)

In summary

- The arguments put forward for Abacus are not sated by the specific location of HPS
- No need for more secular choice. Excellent secular schools are of similar distance and have vacancies
- No more primary places are needed in the area. There are surplus places now which double in 8 years
- The area has a lot of Good / Outstanding schools. There is no need to drive up standards
- Abacus would materially damage existing schools creating more capacity as pupil numbers decline
- Abacus would be unfairly treated with a commercially driven subsidy and surplus space
- It is a huge waste of tax payers money
- It would be a negative impact on pollution and congestion
- It would contravene the Camden Plan and the Draft London Plan
- Local school facilities are underutilised and will become more so. Abacus should share an existing site
- HPS should be used to address planning needs identified in Hampstead
- Abacus would not be approved as a new free school today

I strongly urge you to reject this planning application

Yours faithfully

