

HAMPSTEAD CONSERVATION AREA ADVISORY COMMITTEE - HCAAC
ASSESSMENT OF PROPOSAL – Application 2016/1590/P and 2016/2042/L
PROPOSED ABACUS NEW SCHOOL Downshire Hill & Rosslyn Hill, NW3
Summary of main points in assessing the proposals. Detailed in the following pages.
The 2016 comments are retained for reflection, with *comments on the 1FE application labelled 2019*.

1. Use of the site and adjoining owned site

No master plan, no explanation of the need for all the space planned, nor of management while the school is growing. Presence of an adjacent owned site without explanation as to its proposed use indicates further possible school expansion.

HCAAC 2019 –

- 1. The proposal recognises limits to proper exploitation of HPS site by suggesting a more leisurely accommodation of 1FE, facilitating more proper provision of facilities.*
- 2. That a modern school is to take up a number of stacked floors rather than the current trend for lateral planning still appears unfortunate.*
- 3. HCAAC is not aware of a final likely use for the neighbouring site- the Applicant states it will be sold, indicating non-retention for future school use, to which a school if consented should adhere.*

2. Need for a school

No evidence of Camden education department support for this school. Camden will not have relation to the school as an academy. Camden's reported own borough-wide assessment contradicts developer's claims of need.

HCAAC 2019 –

- 4. Applicant states Camden support the Abacus School. As a school operating in Camden that may be so in limited respect. However, we do not have access to Camden's school places reports, so cannot comment on the Applicant's assumption that support for Abacus and proof of over-subscription is expressed or implied in the 2018 school places report. We note that Ofsted's periodic assessments of schools for grading reports (2018) shows some under-subscription and some full take-up of primary places in NW3.*
- 5. Applicant stresses the 'Outstanding' Ofsted assessment in support of a 'right of entry to Hampstead'. The assessment was in 2015 with update due soon. Enlarging the school roll if that occurred would hopefully maintain that grading,*
- 6. There is local discussion of some under-subscription on NW3 primary schools – we have seen no evidence of this. However there is considerable concern locally and nationally about central government funding cuts producing pressures on existing schools while free schools and academies are fully funded and under no such pressure. Administrative pressure carries risks for schools' performance – eg 4-day week ?? which may unfairly reflect on existing schools.*
- 7. As Abacus proposes to double its roll to a 1FE, from where are the additional pupils to come ? There must be some snatch from the rolls of existing schools.*
- 8. Camden Education Department should be asked for evidence of the need for more school places especially with reference to existing schools.*

3. Catchment area

The validity of the proposed catchment area is queried, as is its likely extension. Edge-of-area school location dubious, apparently seeking enlargement or justifying school size excessive for this site, creating traffic pressure.

HCAAC 2019 –

9. *This point is still in doubt bearing in mind the previously demonstrated wider catchment. How is the proposed restriction to central Hampstead to be applied? What are the addresses of the present families and if not in the proposed catchment how is transition to be achieved, combining a roll reduction by exclusion of wider catchment with an increased roll from less than 100, say, to 210?*
10. *Need to clarify this point, even taking into account the likely inception of a school in HPS at, say, 2022, 6-7 years on from the previously-reported catchment.*
11. *The impression is of a likely raid on existing schools, justified by the 'Outstanding' central government assessment.*
12. *This must be fully assessed and published to preclude disruption and disadvantage to existing schools.*
13. *Catchment should also be assessed to gauge the likely commitment and feasibility of a green travel plan.*

4. Planning of the building

Many proposed rooms have less desirable characteristics for young children. Tight sunless, airless alley as main building entrance intimidating. Use of air-conditioning admission of failure, underlining the poor air quality of surroundings.

HCAAC 2019 –

14. *Some of the above criticism applies to the new scheme.*
15. *This Grade II building should be designed with regard to its Listing description and to what is not described.*
16. *Any design for use of this building must not 'walk-on-eggshells' and must use the best examples and techniques of new design with heritage buildings to maximise usefulness. .*

5. Traffic & street use, submission response.

Traffic submission is flawed, ignoring its own data re car parking and traffic patterns at each end of the day.

HCAAC 2019 –

17. *The current application ignores the problems with the 2016 application, proposing a Green Travel Plan which assumes non-car use for pupils.*
18. *This is in doubt until catchment and relation to existing schools is verified. Applicants' report admits the need to monitor and control – there will be some car use probably in excess of Applicants; stated expectation.*

6. Air quality

Undesirable location and environment for a young children's school, exactly the situation to be avoided, will be exacerbated by a new school's traffic.

HCAAC 2019 –

19. *The above is still true despite growing attempts to ameliorate area traffic impacts and pollution. Electric universality is still decades away.*
 20. *Traffic impacts would be a feature of a school's presence, part parents' school run, part deliveries, part bussing to educational venues.*
 21. *The Applicants' solution to poor air is more use of air-conditioning, somewhat ingenuously called 'ventilation plant' - the obvious degrading of any sustainability assessment of a school's presence and activity*
- .
- .

7. Design

Erroneous claims made for the new rear block appearance, windows etc. Unsympathetic design for a young children's environment. See WGI other school designs.

Design & Access Statement response.

Daylight & sunlight seriously compromised for many rooms and that entrance alleyway.

8. Heritage Statement response.

Police station building a statement of police status balanced with considerations of economy.

This school design, and the NPPF background cited, is only about economy, not 'school', certainly not young children's school. WGI know better than to accept this solution.

9. Amenity

Almost completely lacking in this proposal.

10. Consultation

Much criticised as flawed process, no pre-application discussion, lack of follow-up to DMF, itself a partial and generally unsatisfactory '2nd gear' appraisal, stage-managed, 'developer will be able to answer points raised'...

.....

11. Objections & support

Great deal of strong written objection, un-evidenced sudden support surge over last 2 weeks of this consultation period.

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1. Use of the site

Watkins Grey International – Watkins Grey gave us in the 1960s and 70s the Royal Free Hospital, no doubt among others elsewhere and they have an extensive track record of apparently high-quality design in schools and many other sectors.

However, they must be somewhat hesitant in putting a proposal for the Abacus School, difficult as it is to justify its scale and crowding on this site. According to their website, WGI are more accustomed to open-site school projects than an over-developed, under-spaced vertically-stacked scheme. If only there were an established need for another such school, we might be glad of this use of the site.

Proposals as drawn appear to be at odds with the building and the site.

Crowded externally, using the whole site area – no spare ground space, proposed ground space (SLOAP) below minimal for such use and eventual pupil numbers, extension over the reasonable limit for such a building.

Hamstrung internally by the Listing of the police station building, wherein there seem to be many untouchable elements and constraints on planning.

The proposed new rear building is not appropriate to the Listed connection, requiring more thought in envelope design, reduction of massing, ideally abandonment of the roof-top playground.

Lack of appropriate open space at ground level suggests this rooftop play area, itself normally undesirable, the necessary fencing inappropriate for connection with a Listed building. Perhaps swap involving a rooftop garden with less visible enclosure and a ground level more easily supervised play ground.

The apparent decision to use the stable block for storage seems a missed opportunity. Storage of different materials is the one element that can use available space within the tight floor planning and awkward corners of the main building. UCS Junior School has a similar outbuilding which it uses as a studio.

A classroom set exploiting that block and its immediate surroundings would be more welcome than shoving the reception and Year 1 children in the front basement looking out on the street lightwell.

The expectation must therefore be that the block will be used for future expansion of the school.

A proposed single parking bay is a strange addition and encumbrance on such a tight site, the space should be used for the excessive parent & child numbers to get in off the street. Instead of opening space off the pavement, the area – Main School Entryway - is to be boundary-gated

There is also uncertainty over a required electrical substation which may have to locate at the entryway. Handling of the crowds of parents with children, parents waiting, even if only 200, has not been considered, consigning them to surrounding pavements, a hazard to which many residents have referred. 'It will do, someone else's problem' seems to be the approach. That is aside from the inevitable conflicting, competing car traffic.

The wider pavement is on Rosslyn Hill but away from the Main School Entrance on Downshire Hill. Parent numbers consigned to Downshire would be hazardous, inevitably seeking use of the off-street entryway.

Camden's education and streets would have to combine to make parking on Downshire flexible to allow for the inevitable car traffic. Parents would also park in other streets which are themselves stressed, as the traffic and parking analyses show.

As pupil numbers are scheduled to get to 420 only by 2025, There seems to be ample time for a new site search for a feasible plan. This site should be considered for only a 210-pupil school if anything. An alternative use for the site has been suggested as flats – studios and 1-beds for which there is great demand in the area and might also ease pressure for essential workers' housing. Such use would be car-free. If the Applicant has paid 'top-dollar' for the site based on an untested business plan, that should not govern any consideration of consent.

2. Need for another primary school and in this location.

39/41 primary schools listed in Camden including this one in Belsize. Camden's reported statement of planned sufficient provision until 2025, the same timing as this proposal's growing life. Unclear as to exact plan content but appears that current tightness is being met, not a statement of adequacy. Suspicion that such a plan must include an enlarged Abacus school. It is known that St.Lukes in the north of the borough is many times over-subscribed, most probably from outside its official catchment area which should limit this and with it undesirable car use. Schools traffic is a constant problem. Even so, expansion pressure remains.

Extract from Camden's Education Achievement and Aspiration Framework

ensure that children in Camden have good access to a broad range of high quality provision for early years where they make good progress in their learning and development placing Camden among the top performers in London; increase educational attainment to achieve our goal of having the country's best schools within a decade, where the best schools accessible to local children and young people with excellent teachers and leaders supported by strong governance; ensure that there is a broad and exciting curriculum with an entitlement for every child and young person which includes music, sports, health and well-being, youth and cultural activities and engagement with the world of work; provide integrated support to families in Camden with complex needs in order to reduce the number and range of issues they face, and enable the children in them to achieve to their full potential;

Extract from London Pre-Prep Guide to 'top' primary schools.

Outstanding state primary schools in Camden are massively oversubscribed. The new free school Abacus Primary in Belsize Park will provide some relief, but it may not be enough.

Extract from Camden's Website: Primary Schools

Camden has 39 primary schools, which participate in the co-ordinated application process. All are mixed gender schools, 20 of which are voluntary aided schools (13 Church of England and seven Roman Catholic schools). The remaining 19 are community schools.

Many of Camden's primary schools are oversubscribed, meaning that they receive more applications than they have places available.

HCAAC - Therefore there appears to be an argument in favour of a primary school on this site. However, on this site is the problem, as the following pages will show.

3. School's proposed catchment area

Extract from Camden's Website: Primary Schools

The primary schools in Camden do not have 'catchment' areas. The area where children live who have previously been offered a place at a particular school can vary from year to year depending on the applications received. This is why in one year a child may be admitted to a school, but the next year a child living on the same road may be too far away to be offered a place.

HCAAC - It seems unclear how the proposed Abacus School might fit into the borough's provision, catchment area being apparently less of a criterion but related still to locality, not aimed at

permitting car use from distant areas. Demand for 'good' schools paramount, possible selection criteria for 'academies' angled towards pupil ability and parental insistence, 'unimpeded' by local authority.

General population growth is inevitable, to some extent uncontrollable. However, if there is said to be urgent need for more school places, the proposed delay in building to just 420 places seems inconsistent. Likely therefore, that once settled, the school would quickly try to fill to capacity. However, a sudden increase to 420 places would seem to be well in excess of Camden's expectation of planned increases. Therefore a school aiming at 210 places would seem more appropriate. That combined with a firmly-regulated travel plan might make this location less objectionable.

If policy allows both this particular Change of Use and even 210 pupil numbers:

Proposed roll increase appears to be due to the enlarged catchment area. (Chalk Farm, Swiss cottage to just south of the police station.? then northwards to where ?) The site is said to be outside or at one extreme end of its supposed catchment area. Not serving Hampstead area ? The residents' supporting comments cite the benefit to Hampstead ? But tweaking catchment area to make the school 'local' ? Abacus already has pupils from other areas (see Church Row & Perrins letter 20 April 2016 appendices 1,3). In fact it is more likely that the school will welcome all comers regardless of travel intentions.

4. Planning of the building as proposed.

HCAAC comments on the 2016 planning now superseded.

5. Transport & Traffic Assessment.

HCAAC - The Applicant's report suggests a classic tactic of blinding with 'science'. Many pages of statistics are advanced, detailing the existing traffic situation, collisions and injuries profiles. The construction industry is familiar with this kind of 'paper ambush' typical of contractors' case-making.
NPPF:

"Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Accommodate the efficient delivery of goods and supplies;

Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;

Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;

Incorporate facilities for charging plug-in and other ultra-low emission vehicles; and

Consider the needs of disabled people by all modes of transport."

The Applicant's submission quotes, and HCAAC responds:

CS11 Promoting sustainable and efficient travel; not proven in this scheme we think.

CS16 Improving Camden's health and well-being; unfortunate juxtaposition of young children and poor air quality, inadequate open space, relying on a rooftop playground.

□

DP16 The transport implications of development; insufficiently examined, unsatisfactorily answered.

DP17 Walking, cycling and public transport; PTAL 3 rating or better seems appropriate – 5 bus routes, 3 stations within 10 minutes' walk. Impossible for this use and location to encourage general cycling to school.

DP18 Parking standards and limiting the availability of car parking; not within an eventual school's control, travel plan or not.

DP19 Managing the impact of parking; ditto and potentially chaotic and dangerous here.

DP20 Movement of goods and materials; greatly constrained here we think, and still imposing on the immediate locality.

DP21 Development connecting to the highway network ;little doubt about this outside the rush hours but its connection actually adverse and exacerbated by school use.

DP32 Air quality and Camden's clear zone; fine if this aspect could be controlled, but such is outside Camden's control, let alone the school's.

Although the traffic data is from 2011, more recent nationally-based data supports the trend that growth in traffic numbers is not growing as forecast in the mid-2000s, and some reports (sic) would say that the growth is flat-lining. HCAAC: whose reports, why not evidenced here ? (Journalists always say 'many people are.....')

When looking at trends in urban centres, the increase in car-free developments, along with the improvement in public transport provision, is further delivering incentives to reduce time traffic flows, which in turn results in the probability (sic) of modal travel habits being re-ordered away from regular peaktime car travel choices. Good luck with that. The excitement and convenience of car ownership hardly dimmed even with the trials of rush hour travel.

HCAAC:

Much effort devoted to detailing national and local transport policies but nothing of the reports supposedly indicating no growth in car use. Manufacturers and sales outlets continue to announce increased sales year-on-year, cycle highways criticised as likely to cause further congestion.

The outgoing Mayor of London announced that his successor would have to deal with increasing car use, a valid observation, something which his 8 years showed to be essential but not tackled, defeated so far by vote-getting and powerful vested interests. Residents' comments also reflect on the known aggression associated with school-run traffic and parking, and conclude from experience the difficulty of promoting and enforcing school travel plans against parents' wilful determination. Despite Camden's car-free desires and policies, car provision continues for most private housing developments. The NW corner of the borough is to have parking of 400 cars under recent & new housing developments. Barnet requires 1:1 parking ratios and on a new site right on the A41 and Camden boundary.

The Applicant's submission quotes:

"The site is not currently being used and no vehicles are being parked on site. As a Police Station there would have been frequent vehicle movements. There are no specific records of these trip counts."

"The parking stress levels on the immediately neighbouring roads, Roslyn Hill, Downshire Hill and Thurlow Road were surveyed 11th February 2016. Since the purpose of this survey was to gauge the parking stress levels at key times in the school day, they targeted the arrival and departure times for the school."

The survey data also records the CPZ controlling times and locations. Some areas of the CPZ is for the general public whilst other areas are dedicated to the local residents.

The Parking Stress Data is provided in Appendix D.

This study shows that at the chosen key times for the school, the parking stress levels were at 60-70%.”

“The site was visited by the Audit Team together on the morning of 4th February 2016 when weather conditions were dry and sunny. Traffic conditions on Rosslyn Hill were light/moderate and on Downshire Hill light. Several pedestrians and no cyclists were observed in the vicinity including several parents and children returning from a nearby nursery.”

HCAAC:

All the above showing the status around an unoccupied site.

The audit appears to have been taken at a more leisurely morning time just after school arrival times and general commuting.

The police station in use will have had single vehicle movements spaced all through the day & night driven by most competent individuals well aware of traffic into which to fit. No stress in such incidence.

School run parking and movements, on the contrary, are known to be chaotic, fuelled by elevated nervousness and much bad behaviour, actually the chief cause of rush-hour general congestion. Added to sheer car and pupil numbers and it is clear this scheme is unsustainable in respect of the inevitable associated car use.

The following are quoted exchanges between the Applicant and traffic consultant.

Applicant:

“2. ITEMS RESULTING FROM THIS STAGE 1 AUDIT.

HCAAC: These are Q&A paragraphs indicating likely conflicts, with Applicant’s response, assessor’s recommendations against remaining problems.

2.1 GENERAL

2.1.1 PROBLEM - Summary: No provision for coach parking

It is thought likely that for a school of 420 children there will be coach trips or large minibus trips on a fairly regular basis. There are no locations for such a vehicle to park on the carriageway adjacent to the site in order for children to load directly from the footway. A coach waiting on the carriageway would cause congestion.

RECOMMENDATION It is recommended that the need for a dedicated coach bay is reviewed, on Downshire Hill, by removal of existing on-street parking. It could be that this bay is for school use between say 8am and 4pm, and for resident’s parking outside of these hours.

The School informs us that travel for organized school trips are free by Public Transport so they are very unlikely to call upon Coaches/mini-buses. Camden are not keen to encourage any arrangement that might trigger regular vehicle visits other than essential ones such as refuse collection and food delivery. OK. Long term if the need does arise then there would appear to be scope on Downshire Hill to accommodate a dedicated bay for school vehicles. (sic).

HCAAC: Any such layby provision in conflict with resident’s and other parking, regular large vehicle movements inappropriate to the street scene, requiring pavement crowding, noise and traffic delays.

“2.1.2 PROBLEM - Summary: Risk of reversing vehicles

No details have been provided relating to the on-site parking, although it is understood that this would comprise one disabled bay plus access for servicing. It is not clear whether a large van for example can turn around within the site and exit in forward gear. Exiting in reverse could be hazardous for pedestrians on the footway.

RECOMMENDATION It is recommended that swept path modelling is undertaken to check on-site space so that vehicles can exit in forward gear.

The site has no space for vehicles entering and turning on site. The School already has a car-free policy in keeping with Camden's Planning Policy. There will be one space for disabled parking and this will be at the entrance and the arrival and exit will need to be managed by the School staff. This management in itself will serve to deter unnecessary use of this space.

OK.

With regards to deliveries what provision has been made?

(HCAAC: Apparently no response). Provision impossible on this site with the tight remaining open space between buildings, the gates, single on-site parking space ??, uncertain substation location.

"2.1.3 PROBLEM - Location: General - Summary: Risk of congestion and unsafe parking

No traffic data has been supplied – concern arises that 420 children could generate a significant amount of vehicle movements. (sic) There is very little road space or car parks in the vicinity of the school in which to park for collection in the afternoon, and dropping off in the morning could lead to vehicles stopping and being parked in unsafe locations. (sic)

"RECOMMENDATION It is recommended that the traffic generation associated with the school pupil numbers is estimated in order to determine if the local road network can cope with the influx at drop-off and pick-up times, and what measures might be able to be introduced to mitigate against this to ensure safe movements. (sic)

HCAAC: This contradicts the proposal for a likely school plan trying to ban or limit car use, recognises the great likelihood of problems from re-location and expanded catchment.

Applicant:

The school has been operating at two sites in Camden for three years and has 90 pupils none of whom arrive regularly by private car. There are no drop off/arrivals/departures. Camden insists that no provision is made to facilitate such proposals.

Response noted. A stage 3 audit would need to be undertaken at school drop-off or pick up times in order to establish if any safety problems were arising. (sic)

HCAAC: Applicant's statement based on existing school sites with different catchments and far less pupil numbers than the initially-proposed 210, let alone the eventual 420.

"2.4 NON-MOTOR VEHICLE PROVISION

2.4.1 PROBLEM - Summary: Higher kerb upstand

The existing rear access to the site comprises a kerbed side road off Downshire Hill. There is a pedestrian routing across the access although the existing kerb upstand varies from flush to 50mm, which could cause difficulty for some pedestrian types.

RECOMMENDATION It is recommended that the kerbing is reset with 0-6mm upstand and footway locally resurfaced to suit, in order to assist pedestrians. Tactile paving to be installed if required by the Highway Authority.

Agreed this recommendation will be followed.

OK .Alternatively introduce a footway crossover and remove the kerbing since the new school site would appear to have less traffic movements than before. (sic)

HCAAC: note the assumption of less traffic !! ignoring the concentrated stresses at each end of the school day as well as the contribution to the well-known extreme school-run pressure on the local area.

“2.4.2 PROBLEM - Summary: Risk of vehicle/pedestrian conflict

For a pedestrian standing at the east side of the dropped crossing across Downshire Hill, their view to the right could be obscured by a vehicle parked in the southern end of the parking zone, such that the pedestrian could step out into a vehicle’s path. This problem would be worse for a child pedestrian who would not be able to see over a parked car.

This recommendation will be investigated in discussions with Camden’s parking team. Camden have so far resisted any suggestion to make adjustments to the parking zones.

The creation of a school will exacerbate any existing pedestrian safety problems which will need to be addressed in that light.”

Unquote

HCAAC:

The above audit shows a number of future problems which the proposed scheme cannot answer.

For instance the idea that a delivery vehicle might enter the site to access some turning circle for direction reversal. Impossible - conflict with the desperate need, on such a tight site, for sheer space for children’s outdoors activity and simple movement of people.

Parking maps and tables show the high degree of parking stress already around the site, which can only be exacerbated by a school presence.

The substation appears as a sudden new arrival and again shows the impossibility of planning a proper school layout on this site.

Date of full capacity stated as 2025, although said to be unknown. Likely to be advanced ?

Travel plan template seems to be based on the existing school travel patterns.

No conclusion is offered from submission of all the statistical data. Any Travel Plan has to be assessed in detail relative to the site numbers and effect of catchment area enlargement.

6. Air quality.

“9 Local Air Quality Management Technical Guidance LAQM.TG(09), DEFRA, 2009

*The review of baseline air quality undertaken for the purpose of this assessment indicated that **sufficient pollution monitoring is not currently undertaken by LBoC in the vicinity of the proposed development site. As such, suitable data for verification purposes was not available and all predicted concentrations are therefore unverified.***

*It is considered the use of unverified results has not significantly affected the outcomes of this assessment as the latest sources of input data were utilised where available, including the following:
Traffic data obtained from the LAEI;*

Air Quality Assessment Abacus Belsize Primary School 3rd March 2016 AQ101271r1

Emissions Factor Toolkit (version 6.0.2) released in November 2014, which incorporates updated NOx emission factors and vehicle fleet information;

2014 emission factors were utilised rather than the opening year of 2017. As emissions are predicted to reduce in future years, this was considered to provide a robust assessment; and

Use of 2014 background concentrations.

Based on the above, the use of unverified results is considered to be valid in the context of this assessment.” (sic)

HCAAC: This conclusion is erroneous especially given the likely elevated traffic levels and the relatively enclosed nature of the proposed school adjacent to areas of high emissions, whether on Rosslyn Hill or around the school at day’s start and end.

The AQ study conclusions appear to be based on nil increase in traffic at the school and surrounding areas. This is shown elsewhere to be in error due to distances travelled and strong likelihood of substantial car use at/around the site. No account is taken of this nor of the expected natural increase in traffic over the next 5-10 years. These are important considerations and even extrapolation should be attempted to complete such a study.

A school’s Travel Plan will probably show minimal car use, which is highly debatable, but the bad news as expected should be anticipated.

The outgoing Mayor of London announced that his successor would have to deal with increasing car use, a valid observation, something which his 8 years showed to be essential but not tackled, defeated so far by vote-getting and powerful vested interests.

7. Design of the building envelope – Applicant’s Design & Access Statement.

HCAAC: The developer’s statement quotes the NPPF:

“business should not be overburdened by the combined requirements of planning expectations” and that “planning policies should recognise and address potential barriers to investment”

The reasonable aspirations of local populations are thus to be trodden in the mud of feasibility and financial sustainability ?

On the other hand:

Take account of the different roles and character of different areas, promoting the vitality of our main urban areas... ;

“Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;”

These requirements should be seen alongside the considerable effort in explaining the site’s and building’s heritage and its greater and lesser components. Even at the end of the business-progressive 19th century ‘economy’ was weighed against the wish to respond to the valuable function and proper status of the police.

Therefore as to the design for a primary school for 5-11 year-olds:

The proposed high blank façade to the proposed new over-massed hall and entrance block is an element at odds with the above NPPF requirements. Neither vitality nor high quality visual design is offered in the large rear building. It is not a welcoming feature for youngsters, rather suggesting as in the courtroom interior an essential environment for order and discipline regardless of, or in the courtroom reinforcing, sentiment aroused in those brought to them. The excessive single rectangle seen also from the proposed courtyard and amphitheatre is a gauche featureless and over-simplistic element. The D&A Statement makes play of the vertical slot windows as ‘reflecting’ nearby buildings with their vertical emphases. This is not so, the slots sharing none of the careful proportionality or

charm of earlier styles, being used merely as a device to try to spilt up the overall rectangle, in which aim it clearly fails. They are in fact repeats from similar elements in some others of WGI schools, nothing to do with this site or location, notably Deptford Green and Seven Kings schools, the East London school (DAS p.40) and in other building types. It is a retro feature of 1960s façade design. The 1980s are represented by the facile proposal to vary brickwork colours on a flat elevation. The problem is precisely illustrated on page 47 of the D&AS where the contrast between the typical existing modelled facades and the proposal are very clear.

Moreover, the statement that the new building keeps to the ridge line of the existing roofs is all too common in new developments and here additionally debatable. Such statements always ignore the new block's having a flat roof therefore greatly increasing comparative and visible bulk; also in this case having a higher and substantial fencing structure out of keeping with the existing.

There is also something not quite right with the CGI view from the ground floor open area in which the impact of the new block appears less dominant than would be the reality. This is due to the slightly lengthened apparent space and lower elevational angle therefore implied to the block's top edge.

The other obvious 'slot' objection is to the too narrow alleyway between the existing and proposed new buildings. No sunpath diagram can justify the almost-enclosure of this NE-facing space, whose darkness and overbearing proportions, again, are entirely threatening.

Examination of WGI schools projects shows the more common leisurely open-area-planning seen in such projects where land locations and sizes are much more suited to the genre. In other words, this proposal is a retrogressive step relying on stated success with other less desirable constrained sites (DAS p.40)

Residents have also written (responses to application) to remind us all that there are nationwide many examples of good design in form and psychology of new primary as well as secondary schools. If the imposition of Academies on our schools' environment is denoted by the 'economical' treatment of buildings, then that is perhaps a sign that Academies are not to be foisted on us, resulting simply from Treasury preference for 'economical' provision it is to control. The rear building's mass and facade rectangle rather illustrates determination to subjugate to policy, not considering an appropriate environment for young children.

"Daylight is essential to prevent the development of short sight in children. Recent research suggests that children should spend at least 3 hours in high levels of daylight, preferably outside, every day."

No doubt this can be met, but not too much of it at this proposed school.

8. Heritage Statement.

The statement cannot be productively queried, based as it is on mostly factual evidence. The emphasis appears overdone as if somehow to justify intervention as an article of continuing history. Insofar as it is an important statement of history, the use of this site and design of any buildings should respect the history.

Listed Building Application

There is no doubt about the heritage values of the building as presented to the two streets, a piece of civic pride and authority. As such it more resembles a small town hall, perhaps a library. The court entrance is defined by the signage, otherwise reads as the side entrance of the main building.

The site, the building form and its Listing appear to constrain a school's ambition, limiting freedom of expression, of spatial exploration, open space. The new rear building is planned to anticipate the

school's needs ahead of time. It is clearly impossible on such a tight site to envisage future adaptation and extension so the school has to be presented in its proposed final form from the first. A 210-pupil school, still apparently ahead of Camden plan requirements, would require less space and volume, halving the rear building mass, allowing some more space on the site.

The existing rear south wing building is ungainly, unworthy of the overall Listing, but it is kept back from the boundary as the new building is built sheer on the boundary for its full depth. This would undermine the Listed status of the original as seen from the south side.

9. Amenity.

This site, its constraints, lack of open space, local air quality, no soft landscaping or planting worth the name, building's dominance all add to a lack of amenity for young children. The splitting of the ground level open space underlines this considerable difficulty and the strange 'storage' use proposed for the stable block adds to the sense of dead space. It is not possible to envisage this site in pleasant use for a great number of pupils. The site relies, as so often with over-development, on trees and landscaping on neighbouring sites.

Tree Report.

HCAAC:

All trees adjacent to the site are to be retained as they are not on the proposal site. A landscaping plan for the school proposal is required and should show trees and shrub growth if possible, tight and un-accommodating though this site is.

The proposal without this is insufficient for a school's proper functioning, providing little or no amenity environment.

Applicant's tree surgeon:

".....However, this report should not be seen as a substitute for a full Safety Survey or Management Plan which are specifically designed to minimise risk and liability associated with responsibility for trees.

The trees were all deemed to be in an acceptable condition and no significant defects were observed. Consequently, no remedial works have been recommended. However, it should be noted that a very limited inspection was undertaken as many of the trees are located on adjoining land and were not accessible.

Category U trees have been recommended for removal due to their poor condition, and should be removed regardless of development proposals.

When development proposals are available we recommend that an Impact Assessment is carried out before submission to the Local Planning Authority. This will identify any potential issues so that they may be resolved or mitigated against.

10. Consultation.

We note the considerable number of objections raised to this proposal as well as (up to shortly prior to comments close when a strange flood of favourables filled the documents page) a very few supporting statements. The favourable comments, however few or many, are based on the

assumption of a contribution of the proposed school to the local need and community, which it is being demonstrated is a wrong assumption, certainly not the school's original proposal.

Residents complain of Pax Lodge DMF meeting points ignored in the proposals. DMF answers to residents questions are routinely met with – 'the developer will be able to answer these'.

Objections noted and with which we agree and which we consider our LPA should weigh as significant reasons for refusal of the application:

Overdevelopment; lack of need for such a school in the locality; wrong location relative to catchment; excessive building mass; insensitive elevational design; crowded site; insupportable traffic issues; pedestrian overcrowding; proposed evening use; failure to consider or report conclusions on possible use of the vacant neighbouring site.

This scheme demonstrates the problem residents and local organisations their representatives have with lack of full consultation and impervious and opaque pre-app discussions on which regime there are growing comments elsewhere. Applicants appear to be given the impression of a done deal wherein the scheme proposals become a virtual fait-accompli. In this case and with apparently unexamined Applicant's claims the scheme basis is erroneous and we consider the Application should be refused in its present form. We do not know what feedback was noted from either the DMF or the proposed exhibition promised (DAS p.11)

11. Objections & Support

Noted from the Camden website documents page the considerable number of resident's objections with some support assuming a benefit to the Hampstead area which is not likely or countered by the problems with this site and implications. Noted also the strange acceleration of support notes close to the comments closing date.

Design quality insufficient consultation (area)

Pax Lodge meeting points ignored in the proposals.

Traffic on site and to & from – transport plan apparently does not deal with ?

Entrance & egress ? Waiting parents.

Overdevelopment

No o/o/hours use wanted.

His site is not suited to school use and other uses – residential medical others ??? Tight site impinges on outdoor space, car parking for essential staff and disabled use. Rooftop play area is a defeat.

Building mass on the boundary unacceptable.

DP16 – contrary to policy as it will cause undue pressure on the area – access not supported by Transport Plan. Conflict with HS2 traffic.

12. Conclusion.

Hampstead CAAC considers that at the very least, this scheme should be re-assessed as a smaller school with a necessary redesign of the new building envelope both to relate more carefully to the site and Listed status of the existing and to provide a more appropriate design for a welcoming primary school.

This constrained site is not appropriate for a primary school. Design and massing reflects old 'board schools' without the quality of those buildings internally or their more adequate open space. The unanswered traffic issues would have to be addressed and the most firm controls placed on any school use here to ensure minimal and only essential vehicle traffic. However, even a 'good' school travel plan will leave parents dropping off 150 metres or less from the site, still boosting Hampstead's known traffic problems.

Greater transparency should apply to future proposals for both the existing stable block and the adjoining owned site, as this proposed use demands a proper master plan for the sites.

We agree with the similar objections raised by the Heath & Hampstead Society and the Church Row and Perrins Walk Residents' Association.

John Malet-Bates

For Hampstead CAAC