



HAMPSTEAD NEIGHBOURHOOD FORUM

1 June 2020

Attention: Alison Dyson, Planning Inspectorate
The Square, Temple Quay
Room 3 O/P, Temple Quay House, 2
Bristol BS1 6PN

Reference: Appeals APP/X5210/W/20/3248002 and APP/X5210/Y/20/3248003

The Hampstead Neighbourhood Forum agrees with Camden's reasons for refusal of this application and objects to the proposal on the basis that it would not conform with the following policies in the Hampstead Neighbourhood Plan (HNP): DH1 (Design), DH2 (Conservation and listed buildings), TT1 (Traffic volumes and vehicle size) and HC2 (Community Facilities)

Impact on local traffic, air quality

Abacus argues that any increase in traffic caused by the new school needs to be weighed against possible other uses for the site and uses as an erroneous comparison as a baseline for calculating any net increase in traffic.

Traffic caused by other possible uses of the site

If the Hampstead Police Station (HPS) was developed into housing, the Camden Local Plan would require it to be car-free. Except for the possible use of taxis by residents, there would be no increase in motor vehicle transport should this transpire.

Should the station become a business centre or offices, there is no reason to assume that Camden would permit on-site parking, leaving only street parking, of which there is limited availability for short periods only. Any potential for increased motor vehicle traffic by any other planning application would be equally scrutinised.

Misleading baseline comparison

The Hampstead Police Station was in a state of decline and disuse from 2000 to its eventual closure in 2013. Given the Met Police declaration that the station was 'unfit for purpose', it is unlikely that it would ever be a police station again. It has created virtually no traffic, pedestrian or otherwise, in the seven years since then.

From 2000 when the response team was moved to another location, the only police permanently assigned to the Hampstead Police Station until its closure in 2013 were the neighbourhood police, who typically are not issued motor vehicles. Indeed, it was the policy of the Met Police to ensure that the “space does not become occupied, so that options for disposal remain uncomplicated” (Stuart Banks Interim Assistant Director - Utilisation Asset Management and Utilisation Metropolitan Police, 5 August 2005).

Kentish Town Police Station, on the other hand, is the only 24-hour station in the borough with a front desk open 24 hours a day. All the borough’s response teams, those with response cars, operate out of the station. In addition, the team dealing with Camden’s night-time economy is based at Kentish Town.

Comparing HPS to KTP is nonsensical.

Any increase in traffic caused by a new school in this local would be a net increase in traffic.

HNP Policy TT1 requires that mitigating measures must ensure there is no net decrease in air quality within the plan area as a result of development.

Children walking to and from this location would be exposed to unacceptable levels of air pollution, yet no outdoor measures have been included to that effect. In any event it would be physically nearly impossible to reduce the existing outdoor pollution along the road under the current circumstances.

Air pollution

The air quality assessment submitted by Ridge and Partners on behalf of the applicants (e.g. Figure 6, May 2019, REC), acknowledges that Rosslyn Hill and the pavement side along it, significantly exceed the legal limit for NO₂ which is 40.

In 2016, the Hampstead Neighbourhood Forum conducted a survey of air quality in the Plan area. We measured the NO₂ levels on Rosslyn Hill nearby the site of the Police Station to be 56.07 i.e. 40% above the legal limit.

Survey and measurements (reference: pages 9 and 10 of the enclosed Air pollution objections report) conducted by a member of the committee of the Hampstead Neighbourhood Forum, during the morning school runs in April and May 2019, also show significant amount of particulates 2.5 and 10 pollution along the pavement in front of the Hampstead police station. It is stated in # 2.1 of the Camden Planning Guidance – Air Quality – March 2019 that “it is widely accepted that there is no safe level for particulates (PM 10 and smaller). Air quality is particularly severe along major roads through the borough”.

Furthermore, the Review of Air Quality Issues commissioned by HCRD to Southwest Environmental Limited writes, in its conclusion, the following: “Considering the sensitivity of the receptors and the likely under representation of the source concentrations. It would be irresponsible of Camden Borough Council to grant planning for a school at this site. It is the

consultant's opinion that owing to the nature of nitrogen dioxide as a toxin; with the lack of a maximum safe exposure level, that to allow planning permission for a school at this location would be akin to knowingly expose children to significant harm."

Local amenity

The proposed design includes a 3m-high acoustic wall to the rear of the building neighbouring houses on Downshire Hill. We agree with the conclusion reached by the consultant Southwest Environmental Limited in their June 2019 report, reference S16-296, that "will (this) overshadow large portion of south facing gardens in breach of BRE209 criteria. Despite the imposition of this monolithic structure, and near complete loss of garden sunlight, sounds levels will remain twice as loud as those recommended in relevant British Standards." **DH1 of the HNP** states that proposals should protect the amenity and privacy of neighbouring properties.

Impact on local schools

The Forum believes that creating a new school in the HNP area will have a detrimental impact on the existing state schools such as New End Primary, which currently is operating substantially under capacity. We note that the projected demand in Camden for state school primary places is expected to decline by 530 places by 2021/22¹ and understand that the projected decline in demand for places in both Hampstead and Belsize Park is particularly severe.

Abacus argues that this is not a new school but an existing school with existing students, not currently attending other schools in the area. This may be the case presently but, in the future, an increasingly shrinking pool of students will be sought for unfilled places, with older, less well-funded schools finding it difficult to compete.

HNP HC2 Community Facilities states that local schools in the Plan area should be supported. Local schools lose £5000 for every unfilled place and ever greater losses places ever greater pressures on the quality of education that these school can provide to the local community.

Harm to a heritage asset

The loss of the original furniture within the Magistrates Court would cause unacceptable harm to the heritage asset and therefore is contrary to **HNP Policy DH1 and DH2**, which require proposals to protect and/or enhance buildings or other elements that make a positive contribution to the conservation area. As the listing notes, "The high-status of the courthouse is manifest in the internal joinery and plasterwork, and the courtroom has an

¹ 2018 GLA School Place Demand Projections

extensive scheme of panelling and furniture.” Without the furniture, the most important room of the building would lose any indication of its original purpose, greatly reducing its historical significance.

Janine Griffis

Chair, Hampstead Neighbourhood Forum

