

Objection to application 2022/1942/P

Dear Patrick Marfleet

St Christopher's school has now complied with a request from Camden planning. This is to submit a supplementary application to be added to their application of last year (Ref: 2021/1327/P) to increase pupils from 235 as stipulated in 1995, to a maximum of 260 "on site in any day".

This number is 20 fewer per day than the 280 pupils that would have been reached within a few years as per my letter of objection to the original application. The most accurate number we have for current pupil numbers according to the original application is 247. However, I contend that this new supplementary application could still allow the school to enroll 280 pupils.

The only public information in regard to this supplementary application is in the redacted Application Form in the section of "Variation/Removal of Conditions". They request Conditions are changed from

***"Relaxation of Condition 03 of permission granted on appeal on 11th March 1992 (PL/9005515) .....The condition reads ""The total number of pupils receiving instruction at the school shall not at any time exceed 235"***

to

***"The school wishes the condition to read***

***The total number of pupils receiving instruction at the school shall not at any time exceed 260"***

However, this wording is open to a large number of interpretations, and for that reason, it is extremely worrying, as detailed below.

1. Stating that the school will not exceed 260 pupils "at any time" does mean the same thing as total number of pupils enrolled. It does not automatically mean they will restrict total number of registered/enrolled pupils to 260.  
The school may be relying on absences due to illness, away days, school trips and so on to always ensure that there are no more than 260 pupils at any one time. In addition, the Application Form states:

"The alteration to the condition will enable some additional pupils to be accommodated. Formal numbers of pupils have increased a little since the condition was imposed, although **due to absences it may be that the number on site in any day has not exceeded the maximum imposed by the condition**" (emphasis added).

So the School seems to be admitting that they are relying on absences to stick to the previously imposed maximum.

2. On the St Christopher's School website, the Admissions policy states that:

***"St Christopher's usually takes up to 30 children into the Reception class, and between 14 and 16 children into Year 1".***

This means that in years 1 – 6, there are approximately 44 - 46 pupils per year. So it appears that the current enrolment, even if we choose the lower number of 14 added in Year 1, the total number of pupils is probably  $44 \times 6 = [264] + 30 = 294$ . That is 44 pupils per year group  $\times$  6 years, plus the 30 pupils in Reception.

In the original application 2021/1327/P, it clearly stated the school planned to have 20 pupils in each of the newly enlarged reception classes. This new application makes no reference to this. So going forward, in a few years time the total number of enrolled pupils would be 40 per year group in two parallel classes for each of the 7 age grades. This means that the school can accommodate 280 pupils. That is, 14 classes with 20 pupils in each.

So St Christopher's School seem to be attempting once again to enrol 280 pupils by the back door, relying on absences, class away days, etc.

3. The question arises of how the School can ensure that no more than 260 pupils are on site at any time other than by counting each pupil in as they arrive and turning away those pupils who arrive after the maximum have been let in. Will the latecomers not be allowed in?

However, if the total number of pupils enrolled per classroom is an average of 18, this will give a total of  $14 \times 18 = 262$  pupils. I believe that Camden Council should place a restriction on the numbers of pupils for the two new classroom extensions to 18 per class. So going forward, all of the 7 year age groups will be of a similar size, thus naturally restricting the combined student roll at close to 260.

3. In the supplementary Application form, it states:

***“Officers raise no objection to the proposed extensions to the existing classrooms, the repurposing of the car-parking spaces and installation of cycle parking and fencing, subject to further details and drawings. However, officers are that concerned the increase of pupil numbers would harm the amenity of adjoining occupants due to additional pressure on the transport congestion and movements in the surrounding area. Therefore, unless it can be demonstrated that the increase in pupil numbers would not have an impact on traffic congestion and movements in the area, the application is likely to be refused.*”**

***Note: All transport issues are dealt with in the registered on 21/04/2021”***

However, in my detailed response to the original application, I pointed out several errors and mistakes made by the Traffic and Parking consultations and the Parking Beat Survey. The latter included private land parking spaces, yellow lines, and so forth which they claimed were available for parents to park. This assessment was directly refuted by Camden's own The Official Report of the Chief Engineer, Engineering Service, regarding “Proposed Minor Parking Changes on Belsize Lane, Harley Road and Priory Road”, dated 5 May 2021. These published figures proved that the parking 'utilisation' percentages in the streets surrounding St Christopher's School submitted in St Christopher School's earlier application were totally inaccurate.

I firmly believe that Camden Council should stipulate that contrary to the chosen revised wording in the **Condition(s) – Variation/Removal** cited above (*‘The total number of pupils receiving instruction at the school shall not at any time exceed 260’*), the revised Conditions should clearly state “that the school cannot exceed a total of **260 enrolled** pupils”. The Council should not allow the school to get away with only committing “to not exceed at any time 260 pupils **“receiving instruction”**”. This latter wording may also be able to be interpreted not to have to include other pupils on the playing grounds on the site, or away for a short while at sporting or other incidental away activities.

Yours sincerely

