



The Heath & Hampstead Society

P.O. BOX 38214 LONDON NW3 1XD

The Society examines all Planning Applications relating to Hampstead, and assesses them for their impact on conservation and on the local environment.

To London Borough of Camden, Development Control Team

Planning Ref: 2016/1590/P

Address: Hampstead Police Station Rosslyn Hill, NW3

Description: Change of Use to Abacus School.

Case Officer: Zenab Haji- Ismail

Date 16 April 2016

This application raises many issues of crucial significance to Hampstead residents. Our comments are set out in the categories 1 to 9 listed by the applicants in their Planning Statement, item 9.2.

1. Principles of Development

The major issue here is Need. What evidence is presented to support the need for a new 420-pupil Primary School in this location? With no fewer than 37 other schools in NW3, with their familiar resulting problems to Hampstead residents, we are entitled to receive crystal-clear confirmation that this is real priority, and that no other alternatives exist.

It is true that 24 of those 37 existing schools are fee-paying, and are here for profit-making purposes arising from a supposed social cachet attaching to Hampstead and its immediate environs, but 13 are LA, Voluntary- Aided or Community schools. We see no evidence that these are failing to satisfy demand within the catchment area defined by the applicants (a much smaller area than NW3). All the applicants can say is that they received 171 applications, for 30 places recently offered. No information exists as to how many of these were multiple applications, how many purely speculative, or how much research was done to prove that applicants were indeed resident in the catchment area. This statement is insufficient evidence to support the foundation of a new school, let alone one for 420 pupils. Study of population census returns in Belsize in fact do not support the assessment of such numbers of children.

It has been said that the applicants' original proposal was for a much smaller school: one for 210 pupils. This is confirmed by the applicants' statement (item 9.7) that the 30 places offered for school year 2016-17 would satisfy the assessed demand. The paragraph continues: "... providing accommodation that can accommodate 60 pupils per term will enable the school to meet more demand" What demand? From outside the catchment area?

On what basis has the school size been doubled, seemingly at the last moment, without explanation?

The site is located in the extreme Northern corner of the designated catchment area. No doubt it might be said that this is not deliberate, and arises purely because no other sites were available, but there is no doubt that this distorts the reality of its catchment. Those living in nearby Northernly streets (e.g. Willoughby Road or Gayton Road) would be excluded, leaving residents in, say, Buckland Crescent needing to travel the maximum specified distances to access the school. This is likely to distort the schoolrun figures significantly, and lead to local conflicts

Information from the Downshire Hill Residents Association, which you have, develops these points. We agree with their conclusions..

What is especially significant in the medium and long term is the dreadful precedent this school would set for other existing and new schools. The fact that Abacus School would be non-fee-paying would be only one of many factors considered relevant by school development companies applying for new schools or substantial extensions to existing premises. They would say : “ if the Police Station site can safely accept a new 420-place school without Planning harm, especially in terms of its traffic generation, then what is to prevent us from creating another 500, 700, 1000 places?”

The longer-term future of the building is also a matter of concern. A situation could arise whereby the Abacus School proves unsuccessful/uneconomic and needs to move. Or proves so successful that requires larger premises. In either case the site could be sold, with an established educational Planning use, probably to an existing fee-paying school. All the arguments about the social/public virtues of Abacus would then fall away, and we would be left with yet another school where control of its intake and its schoolrun problems would be lost.

The fact is that Hampstead is already, for many historical reasons, many of them unrelated to educational need, a schools ghetto, with 37 schools, providing 10,250 pupil places (2015 figures), and is already grossly overdeveloped.

Enough is enough.

2. Heritage

The applicants have made some effort to retain what they define as the essential features of the existing Listed Building, by ensuring that the Rosslyn Hill and Downshire Hill frontages are retained without much alteration. They seem to think that this is enough, and that anything lying behind the frontages can be altered or demolished at will.

This “facadism”, regarding listed buildings as film sets, giving respectability to what may be otherwise quite unacceptable development, goes against all the principles of the conservation of our heritage. This is particularly so where the new building work is larger, bulkier or higher than the existing, making the new work more conspicuous and obtrusive than what remains of the original. This is most decidedly the case here, where the new building would tend to overwhelm the existing, especially seen from Downshire Hill.

Nor are the rear internal parts of the building devoid of heritage importance. The panelled Magistrates Courtroom, and its associated custody suite (cells) are of historic and interior design interest. The conversion of the courtroom to a standard classroom, and the loss of the cells, would be a severe loss. The applicants do not seem to regard this area as being of any significance.

It is clear that the obtrusiveness of the extensions is principally due to the unacceptably larger building that is necessary due to its doubling of pupil capacity.

Overdevelopment must not be camouflaged by a skin-deep façade of historical building fabric.

We do not therefore believe that this application properly protects or respects the heritage integrity of this listed building.

3. Design

Our objections to the architectural design of the school are on 3 grounds:

- a Size, bulk, scale
- b. Rooftop play area.
- c. Architecture

a) Size, bulk, scale

The relationship of the building to its listed facades is considered at 1. above.

The bulk of new building is bloated and out-of- scale and context with neighbouring buildings. This can be seen from both Rosslyn Hill and Downshire Hill, where it would be seen to loom up as a building, out-of-scale with existing development, all of which is domestic in height and character. It is true that the existing Police Station building is non-domestic in character, but is not overbearing, its impact being softened by its architecture.

The site should be seen as a transition between the commercial uses of Rosslyn Hill and the High Street to the North, and the purely residential uses to the South and down Downshire Hill.

The relationship of the building to Downshire Hill is particularly important. This is one of Hampstead's most elegant streets, with a wide range of residential buildings, of all periods, many listed, but mainly small-scale and domestic in character. This fragile character must not be harmed by this brutally over-scaled lump of a building.

b) Rooftop play area

The worst feature of the building's design is undoubtedly the rooftop play area, which though surrounded by a metal mesh safety screen, would be a visual eyesore, overlook and damage privacy, and be a serious generator of intrusive noise.

The nearby houses and flats would be subjected to long periods of most irritating and intrusive noise, magnified by the height of the play area, and hardly mitigated by the low-level screen walls.

The Acoustic (not Noise!) Report suggests that some of the noise would be deflected away from houses, but the fact remains that this would be a completely unacceptable noise nuisance, affecting hundreds of local residents.

Their privacy would also be greatly harmed by overlooking from the area.

Further play areas would be located at ground level, adjacent to residential areas in Downshire Hill. None of these are screened in any way.

Childrens' noise is an inescapable feature of any school, as anyone who lives near a school will confirm. To site the source of such noise at rooftop level can only be described as irresponsible.

The only other equivalent feature that springs to mind is a rooftop exercise yard at one of Her Majesty's Prisons, where they possibly didn't have to concern themselves with neighbours' opinions.

It is noted that the adjoining Police building, No 26 Rosslyn Hill, has been excluded from the proposals. This building is in a poor structural state, but the site is quite useful. It could be designed as a landscaped playground area, where its ground level location could be developed as an attractive space for children, and where noise would not be as widespread a problem. We urge the applicants to consider this.

c) Architecture

The architectural design of any building extending or lying adjacent to a listed building can be created either by matching it, or by contrast. Historic England generally recommends the contrasting approach, so that no misunderstandings arise later as to which is original, which is new. We support this objective, but always on the rather obvious condition that the new architecture is of very high standard. We think that reference should always be made to the original designs, by respect for its scale, context, proportion and, usually, nature and colour of materials.

This design is not, we say, of that high standard, being over-scaled (see a) above), lumpish, and of the architectural character of a 1990's office building. Above all, it gives no indication that it is to serve young children and their education, with large-scale vertical proportions, is overbearing and intimidating in character.

The selection of materials is also, frankly, incomprehensible. The existing building is in warm red brick, with stone dressings, in keeping with the character of this part of Hampstead. Contrast in design approach is correct, but to select two (not one) contrasting colours of brickwork, described as grey and stock, presumably yellow London stock, is perverse, and, we say, disrespectful of the listed architecture.

In short, it is not an appropriate design for a primary school, used by small children between 5 and 11 years of age. What they are entitled to have is a child-friendly,

small-scale environment, homely and welcoming in style and detail. There are plenty of examples around the country of such design; we as a nation are justly famous for the humanity of our schools for small children. They would not experience it here.

The applicants make a repetitive point that little of the new building work would be seen from public roads. This is true so far as Rosslyn Hill is concerned, but not for Downshire Hill, where the gradient would ensure that most of it would be very visible. Much more importantly, the users—i.e. the children would have to live with it, within the site. This is unacceptable

4. Transport

It is well-known throughout Hampstead that there has been for many years a serious schoolrun problem, arising from the exceptional proliferation of 37 schools within a small zone of NW3. Traffic congestion, parking chaos, and serious road safety hazards occur, not to speak of air pollution.

Some attempts have been made to mitigate this over the past 25 years or so, by parking enforcement means and persuasion of schools to adopt Travel Plans with various features, but all have been unsuccessful, mainly due to the intransigence of parent car drivers, who have refused to consider seriously any other mode of child transport but cars.

The applicants do not seem to be aware of this, since no reference is made in the Transport Report to this local history, or the extent of public anger over the issue.

They rely in their evidence on what we see as over-optimistic statistics on predicted car use, school travel policies, and parents predicted, as opposed to actual, behaviour.

Some of this optimism arises from their acceptance of predicted walking times within the lop-sided catchment area, percentages of car usage, and acceptance by parents of restrictions on car use in the draft school travel plan.

We believe that most of these assumptions are over-optimistic in practical effect, and that the school would put significantly more cars on our roads, worsening traffic congestion, parking chaos, road safety and air pollution.

At present, the Rosslyn Hill/Downshire Hill area is by no means the worst affected by schoolrun problems. This school would put them into the forefront, comparable with the current epicentre of it the Fitzjohns Avenue/Arkwright Road hotspot.

Specifically, our experience shows that:

a) a substantially larger percentage of parents would become car users from the Southern sector of the catchment area when they actually experience the walking distances and gradients concerned. The topography of the catchment area, with significant South to North gradients, has not been properly considered.

- b) a much greater additional number of parents would become car users when the catchment area is enlarged. The increase of pupil numbers from 210 to 420 would inevitably lead to this. We believe that the figures presented refer to the smaller-sized school only, and need to be re-visited.
- c) many parents would take to their cars in bad weather, irrespective of their usual behaviour,
- d) there is a significant difference between behaviour signed up for in travel plans, and actual behaviour; the experience of other schools in schoolrun areas would confirm this
- e) use of the school building for out-of-hours activities, commonplace in many schools, would intensify traffic and parking problems; this is hardly mentioned in the application.
- f) little assistance would be received from traffic wardens, many of whom admit to being intimidated by aggressive parent drivers.
- g) little help could be expected from local Underground or bus services. Local bus routes would not be helpful to inter-catchment area travel
- h) the promised bus parking bay in Downshire Hill will prove very unpopular indeed. The established medical practice opposite the site in Downshire Hill would be competing for kerb space.
- i) Not enough attention is given in the designs to service and waste (including kitchen waste) removal activities. It looks from the drawings (not annotated) that these will have to use the main entrance doors, surely not satisfactory, or hygienic.
- j) We are unhappy with the provision of only one disabled parking space; since this would not be a dedicated space, and would be shared by other disabled car users.

There is no doubt that this issue, of multiple schoolrun problems, is the one considered most important by our members, and by the public generally. The applicants' approach to this is completely inadequate.

5. Impact on Residential Amenity

Most of the effects arising from the application are covered at 3 and 4 above, especially Noise. See also 9 below.

6. Sustainability

We are not convinced that the design is as sustainable as it is claimed. We are particularly concerned that airconditioning has been found necessary for part of the building; this is surely inappropriate in a primary school, and is, of course, extremely wasteful of energy; its carbon emissions would be high.

We are also concerned whenever large-scale demolition work is proposed. Its accumulated carbon emission, together with the associated new-build work, is always high. This has not been measured.

Here in Hampstead, the further accumulations of waste and emission profligacy is especially high, with major demolition work proceeding simultaneously on numerous sites: Arthur West House, Bartrams Convent, Royal Free Hospital, the various Kidderpre Avenue sites, as well as the impending HS2 work. Hampstead has become an unsustainable area.

7. Air Quality

The likely increase in vehicle use and access to the site would increase air pollution, with the chief victims being our children.

The Rosslyn Hill area already suffers from excessive air pollution emissions. Recent research by the Hampstead Neighbourhood Forum has shown that the Rosslyn Hill/High Street zone is well over double the accepted upper emissions limit, and that public health is already at risk.

The addition of further vehicle growth from Abacus schoolrun traffic would make an unacceptable situation worse, and would be irresponsible.

8. Services and Waste

See 4 above

9. Construction Logistics

We call for a full Construction Management Plan, to be incorporated as a condition to any Permission granted.

Wherever the major access point to the construction site is selected, it must take account of the sensitive nature of the Rosslyn Hill/Downshire Hill junction, the close proximity of residential properties, the steepness of the Downshire Hill roadway gradient, and the impending use of Rosslyn Hill as an access route for HS2 construction traffic.

Safe and certain support of the facades of the listed building should be assured.

Conclusions

Ever since the closure of our Police Station had been forecast, it has been our policy to support alternative uses for the site and building that are of public/community benefit.

Uses such as affordable housing, care home use or medical/health uses have all been considered.

In view of Hampstead' exceptional, indeed unprecedented, position as an educational hotspot, with its associated damaging schoolrun problems, school use has always been excluded as a viable alternative, despite its undoubted importance as a public service. We believe that we have already discharged our public responsibilities in this respect, in full.

37 schools are enough; another would be disastrous.

Summary

We oppose this application, on these grounds

- 1. Unacceptable schoolrun traffic**
- 2. Excessive size**
- 2. Inappropriate conversion of the listed building**
- 3. Unacceptable increase in air pollution**

Please REFUSE