

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/5366/P	Bhupesh Malakar	25/01/2024 16:50:19	WREP	<p>It is to inform that High Commission of India, London has one property (Sun House, 9 Frogna Way, London, NW3 6XE) in the vicinity of the proposed construction site. The house is occupied by a senior level Indian diplomat and his family. Thus, this Mission has the following concerns with Planning Application No. 2023/5366/P for proposed construction activities by University College School, Frogna Campus:</p> <p>(i) High Noise: The proposed construction work will cause noise above the normal comfort level for humans. Thus, it will not only hamper the normal living of the diplomat and his family but will also cause major disturbance to the visitors coming at the property for official business. The serenity of the area will be greatly disturbed by the perpetual humming of the machines and movement of heavy construction vehicles.</p> <p>(ii) Dust Pollution: The officer and his family residing at the Sun House will be continuously exposed to severe dust pollution due to the work of demolition and construction in the vicinity which might result in major health issues to them.</p> <p>(iii) Access to Sunlight: The proposed construction might obstruct direct access to sunlight on a permanent basis for all residents of the property with potential negative implications on health. Any new structure which comes up on a permanent basis will deprive the residents of sunlight which is essential for overall physical and psychological wellbeing.</p> <p>(iv) Positioning of cranes: The proposed work will lead to deployment of huge cranes, lorries and trucks which make it unsafe for the residents living in the vicinity and movement of children in the area. Moreover, it will also lead to increased traffic movement in the area. This will create parking stress in the area and also inconvenience for the officer as well as the guests who frequently visit the Sun House, thereby hampering their ease/quality of living.</p> <p>(v) Duration of the project: The duration of the project is not specified in the planning application. The same may be conveyed to the Mission for planning its activities at the property.</p>

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2023/5366/P	South Hampstead Flood Action Group	26/01/2024 09:08:40	COMNOT	<p>Comments on the Flood Risk Assessment and Drainage Strategy Report</p> <p>South Hampstead Flood Action Group makes no comment on the principal elements of the development, but welcomes the opportunity to comment on the flood risk aspect of the application.</p> <p>Key recommendation</p> <p>The University College School (UCS) proposals aim to achieve greenfield runoff rates through installing a range of flood prevention measures to protect their site which has suffered from flooding in the past.</p> <p>However, because of its key location, we would like them to do much more to help to protect our area, and other areas vulnerable to flooding in Camden and beyond.</p> <p>We would like them to install more stormwater attenuation tanks, including under existing paths and hard standing, working with and supported by Thames Water, Camden Council, the Environment Agency and/or the Greater London Authority.</p> <p>General comments</p> <p>The main flood risk in Camden is from surface water flooding. In 1975, 2002 and 2021 extreme rainfall exceeded the capacity of the sewer system, causing extensive flooding with contaminated water in Camden and beyond.</p> <p>Camden Council's Planning Guidance on Water and Flooding 2019 states that "all development must not increase the risk of flooding" and that "the location of developments can influence the way water flows around and underneath new and existing structures. Therefore development proposals need to consider the risk of flooding, especially when they are located within the identified areas, which must be designed to prevent causing additional pressures on adjoining sites and the sewer system".</p> <p>The current proposals primarily focus on protecting the UCS site itself from flooding. Nothing is said about protecting areas downstream of the site which are vulnerable to flooding.</p> <p>The report severely underestimates the extent of previous local flooding. It refers to Camden's Strategic Flood Risk Assessment (SFRA) 2014, but fails to consider more recent reports and documents.</p> <p>The report fails to consider how, given the topography, additional flood protection measures on the site could have a positive impact on areas vulnerable to flooding further downstream.</p> <p>In extreme rainstorms the western side of Hampstead could play a critical role in holding back water flowing into the sewers, helping to prevent further severe flooding in areas like South Hampstead, Kilburn, Kilburn Park, Maida Vale and beyond.</p> <p>Camden's newly published SFRA 2024, which replaces the SFRA 2014, says that: "flood risk management policies require that developments are 'safe', do not increase flood risk elsewhere and where possible reduce flood risk overall."</p>

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The new SFRA 2024 highlights the dangers of flooding in the lower reaches of the Counter Creek Catchment. It notes that Thames Water's Drainage and Waste Water Management Plan 2023 recommends that "areas in the upstream catchment, such as the London Borough of Camden, should introduce policy to limit discharge rates and minimise impact on neighbouring Boroughs".

The SFRA 2024 further notes that: "Evidence collated by the Royal Borough of Kensington and Chelsea suggests that the 2007 floods were caused by extreme rainfall in areas such as the London Borough of Camden, which lead to exceeded sewer capacity in the downstream catchment area." And it suggests: "Restricting to greenfield runoff as a minimum is strongly recommended to reduce the potential risk of surface water flooding within the Counters Creek Catchment."

More detailed comments

We welcome that UCS intends to meet the greenfield runoff rate standard, and is planning to install a range of flood protection measures.

The 'Critical Drainage Area' shown in Future 4.2 has been copied from the Council's SFRA 2014 so is 10 years old. It does not take account of the severe local flooding in July 2021. It does not highlight the historical flooding in the Belsize Road/Priory Road/Terrace area. It does not draw on more recent documents such as Camden's Flood Risk Management Strategy 2022-2027.

Given the impact of climate change, and the many more extreme rainstorms that have been predicted, we fear that our area will be badly flooded again, unless much more is done to hold back water further upstream.

The highest point in central London, Hampstead's Whitestone pond is 134 meters above sea level. University College School sits on Frognal 48 meters below it at 86 meters, and our area is located another 48 meters below that at around 38 meters. The location of the UCS site provides a critical opportunity for holding back water in a rainstorm.

During the July 2021 rainstorm water flowed down Frognal from Whitestone Pond and onto Finchley Road — which became a river. It then flowed down to our area, South Hampstead, including the Belsize Road/Priory Road junction. Our local manholes erupted because the sewers had insufficient capacity. This resulted in extensive sewer and surface water flooding in our area and in the sewer catchment area beyond ours, such as Boundary Road, Kilburn Park and Maida Vale. There was also severe flooding in the Winchester Road area.

The UCS Flood Risk Report mentions that South Hampstead was flooded in 1975 and 2002. Using SFRA 2014 data, Figure 4.10 records 8 properties in South Hampstead suffering from interior flooding, plus 4 in the surrounding area. Figure 4.1 (a mislabelled 4.11) also from SFRA 2014 records 18 properties in South Hampstead suffering from exterior sewer flooding and 4 in the surrounding area. This is a gross underestimate of the numbers of properties affected in those years.

In Camden Council's 2003 Floods Scrutiny Panel Report it is reported that the police and the fire service took a total of 353 calls from people who were being flooded on 7th August 2002. A South Hampstead resident who was a member of the Panel, further commented that Thames Water recorded only 48 properties as

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having being flooded in Camden, as 48 people had contacted them. However when the council did a survey, they found that over 800 properties had been affected.

The updated SFRA 2024 refers to the NW6 3.. postcode (South Hampstead) area as having over 60 reported sewer flooding incidents between January 2013 and April 2023.

We estimate that over 100 properties were flooded in South Hampstead and Belsize Road/Priory Road area in 2021. Very few people reported that their properties had been flooded to either the council or Thames Water. With our encouragement some home owners subsequently reported their flooding to Thames Water. Significant numbers chose not to for a variety of reasons, including the very real danger of losing their flood cover insurance. We suspect the same happened in 1975 and in 2002, people with extensive damage are likely to have contacted their insurance companies, but many will not have contacted Camden Council or Thames Water.

Most of the Figures in the document do not include our local area, e.g. 4.5 Environment Agency Surface Water Flood Risk Map and 4.6 the Existing Surface Water Flow Paths.

And in Section 7.2 the report comments that surface water will be routed southwards, then westwards, which directs it down towards our area.

South Hampstead Flood Action Group
25th January 2024
