



The Heath & Hampstead Society

To London Borough of Camden, Planning Department

Planning Ref: 2023/5366/P
Address: University College School, Frognal NW3 6XH
Case Officer: Edward Hodgson
Date: 19.05.2024

Please accept this response, further to our previous comments on this planning application.

The 'BIA Additional Supporting Information' from A-squared Studio and the 'Final BIA Audit Campbell Reith' have now been uploaded. These indicate that issues of slope stability have been addressed. However, regarding Residents' Consultation Comments from Redington Frognal Neighbourhood Forum (RFNF), and South Hampstead Flood Action Group (SHFAG) - while also ignoring the consultation comments of the Heath & Hampstead Society (H&HS) - the BIA Audit merely states:

'The proposals have included mitigation measures to mitigate any impact to the surface water runoff and drainage regime of the area.'

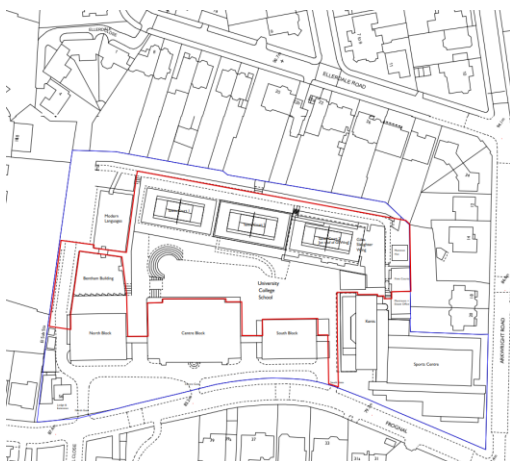
This is perhaps unsurprising since the remit for the BIA Audit seems to be merely to address effects on the immediate buildings, which it has done to some extent, while the final revision of the Camden Local Plan is still awaiting its final consultation and adoption, and presumably a revision of Camden's guidelines for the independent expert reviewing BIAs.

The RFNF, SHFAG and the H&HS were promised in the 'UCS Project 200 Response to Comments on Camden Planning Website, 21 March 2024 Version 3' that

"these points will be addressed by the UCS Design Team FRA and Drainage Strategy consultants separately".

It seems this response to comments was held up while Price & Myers responded to another document by the Frognal Way Residents Association dated 7th March 2024, yet this extra time was not used to obtain further reports from the UCS Design Team FRA and Drainage Strategy consultants or to comment on them. This omission is still extant. While Price & Myers' 'Flood Risk Assessment and Drainage Strategy Report' was submitted on 13th Feb 2024 after receipt of comments from these three local groups (all by 31st January 2024), there was still no glance in an underground or further downstream direction.

In all documents from UCS's experts they are still trying to distance the project from the SUDs, groundwater and flooding issues of the grade II listed UCS main building by excluding it from the Site Area map.



A-squared Studio's new May 2024 BIA document 'Additional Supporting Information' includes in their Figure 2.1: 'Development location within the Redington Froggnal neighbourhood area' – a map produced by ARUP. This clearly shows where the old river ran directly beneath the main (original, 1907) buildings, and the spring marked on this map above the Caretaker's Cottage. Despite this, the impact of these are again neither acknowledged nor accounted for with further tests or calculations. Only surface water run-off is dealt with. Although the Site Area map includes the surface of the path that runs west over to the South Gate between and beyond the South Block and Kents, it has no consideration for what occurs directly beneath this surface. Only a presumption of 'perched water' is made; there is no mention of pumps or groundwater flooding. There is still no indication given that the maintenance staff who care for the 9 pumps beneath the listed building and respond to flooding episodes – the last one in July 2023 rising to 2 feet deep – have been spoken to, and their vital experience of the site and the extent of its floods considered.

We still consider that our comment that the borehole study was not adequate to explore the effects of and mitigation for the pumps, the old river and the spring during storm periods still stands, as does our statement that

"The 'Flood Risk Assessment and Drainage Strategy Report' for UCS by Price and Myers (Price & Myers FRADSR) mentions that greenfield runoff rates were the minimum for Camden's Strategic Flood Risk Assessment (2014) but we do not consider this is sufficient to prepare for the future. It also notes that Camden's SFRA (2014) states: 'Developments in this flood zone do not have any restrictions, *provided they do not increase the risk of flooding elsewhere*'. This has been superseded by the Camden Strategic Flood Risk Assessment of 2024, which repeatedly emphasises protecting others: e.g. 'The Council will continue to ensure that new developments are safe from flood risk and *wherever possible reduce the risk of flooding elsewhere*'. Since 1st November 2023 this guidance, along with the NPPF (2021) and the new Camden Local plan is now subject to the Environmental Principles Policy Statement, part of the Environment Act 2021. This means that such documents that require interpretation must perform this interpretation with the EPPS and its principles in mind. We consider the EPPS adds weight to our argument that groundwater moved directly into the sewer system should be attenuated to protect those receiving it and the environment in general."

We support this project, but do not wish to see the listed original buildings harmed by flood water or an opportunity to protect them further missed. We wish to see the opportunity taken to at least in a small way mitigate for the contribution of this building and the 9 pumps under it towards the serious flooding of those downstream during storms. Groundwater studies performed only across periods of relatively dry weather do not capture the magnitude of what occurs or could occur.

UCS is only a small part of the whole catchment area for the eastern branch of the river Westbourne and the modern sewer system. However, there is a chance to do something both to protect UCS from future floods and to help those downstream by an adjustment to the depth of the attenuation tank they *already* propose to install. With continuing climate change in mind, this adjustment should take into account the size of the diversion by pumps of parts of the river beneath the main building and any groundwater surges diverted from beneath the basemented areas directly into the sewer system during the more frequent and increasingly extensive storms we experience.

This would then follow the direction of the Environment Act (2021) and the newer NPPF (December 2023). The spirit of the Environment Protection Policies Statement (November 2023) also requires *the interpretation* as well as the writing of policy to be considered in a way that protects the environment and other people from the effects of human activity on the natural environment.

David Castle, chair Planning Sub-Committee, Heath & Hampstead Society
Dr Vicki Harding, Planning Sub-Committee