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To:
Planning – Camden Council

Submission of comments on Planning Application for redevelopment of Liddell Road & proposals to expand Kingsgate Primary School:

Sidings Community Centre is writing in response to the two planning applications submitted for the Liddell Road redevelopment: 2014/7649/P and 2014/7651/P. These comments relate to both planning applications as per the topic raised.

Firstly, we must make it clear that as a community centre, we would support the provision for a new school building, housing and the employment space – although we lament the total loss of successful, active light industrial businesses which have been on site for a long time, providing job opportunities for local people.

Our comments and concerns over the 2 planning applications, are as follows:

1) Proposal for 11 Storey Tower Block:

Along with other local groups and many residents, we **object** to this proposed building on the basis of its height, which is out of character with the rest of the immediate neighbourhood. It is situated immediately adjacent to the western end of Maygrove Peace Park, and in close proximity to the centre premises. We consider it to be an overbearing, imposing, and unnecessarily tall building, towering over the park and centre premises, in particular our existing outdoor play areas for our nursery provision. This raises concerns for:

- Children playing in the park, Sidings' own nursery outdoor play areas, and also the new school play areas, being overlooked by residents in the tower block - raising potential safeguarding issues
- Serious disruption from vibrations from deep pile driving and also continuous high noise levels during 2-3 years of building works. If the scheme goes ahead, we would request that we can negotiate the timing of some of the particularly noisy or heavy works to minimise impact on the families using the park and our early years' facilities. This should also be a consideration for children in the new school, as they will face 2 years plus of disruptive building works when the office block and residential units are being constructed - within a few feet of the school. We do not consider this a healthy environment to bring young children into.
- Overall shadowing – whilst the drawings show shadowing from the tower in the morning only, it fails to show the combined impact of the tower and new office block which will inevitably lead to loss of daylight, particularly in the winter months when the angle of the sun is lower. Drawings shown with lots of foliage,

from certain angles also give a false impression of the visual impact of this tower on the top of the park, reducing the enjoyment and feel of the park as a light, green open space in what will be an increasingly densely populated area.

- The impact of lighting in the evening from the tower block, particularly during the winter months when there is no foliage protection, has NOT been shown at all in any drawings. Lights from the tower may shine directly into parts of the centre premises and those homes on West End Sidings estate which face the park, from late afternoon throughout the evening. It does not seem clear from the architects' plans whether the proposed glazing will be of a type which will mitigate against this. Additionally, the outdoor sports pitch – which is close to the tower block – is used in the evening during the winter months and has floodlights to light the pitch. These are likely to shine directly into the lower level apartments and provide a problem for those residents facing the park. As sports and fitness is being increasingly encouraged as part of the health agenda, and Sidings is developing sports for young people on the pitch in the evenings, either new lights will have to be fitted with appropriate shade-guards otherwise this will be a permanent problem which has not been considered.
- **Location** – we would support suggestions from members of the community who have previously suggested a higher building would be better located at the far end of the site, and that the school would be better placed nearer to the park. We believe that this is a far healthier and appropriate outlook all round, and that possible opportunities to optimise the overall use of the site have not been fully explored. Its proposed location also prevents any extension of the eastern end of Maygrove Peace Park, in particular the much hoped for expansion of the wooded area in between the pitch and base of the tower block, and creates a hemmed in feeling from the park side of the development.

We believe that the justification presented in the Planning, Design and Access Statement (PDAS) – as regards to the scheme needing to be self-financing from the sale of housing, may be misleading. The justification for viability and financing of the school seems to rest on an argument for a self-financed scheme, funded from the sale of houses - referenced in a December 2013 Cabinet Report (cited on page 193 of PDAS). This also stated that the overall profit should generate £3 million excess from the sale of the houses to be awarded for spend elsewhere in Camden. However, in March 2014, when Camden agreed to the expansion of Kingsgate School, it clearly stated that a government grant of £6.7 million would help finance the building of the school (costed at £13.4 million) – with only the balance having to be found from the sale of housing.

Extract from March 14 Report re Expansion of Kingsgate School:

10. RESOURCE IMPLICATIONS (comments from the Director of Finance and others as appropriate such as AD (HR)) (signed on 21st March 2014).

10.1 The Council has identified that additional primary school places are needed in the north west of the borough. As a result, the Council is required to provide the land and funding for the construction of any new school or any new school buildings. ***The construction of the proposed additional buildings for the expansion of Kingsgate School is estimated to cost £13.4m. This will be funded by the Council from a £6.7m***

government grant for the creation of school places with the balance funded from the sale of housing units elsewhere on the development site.

Based on this information, with Camden's previously estimated funding from the sale of non-school land and houses being £16.4 million, it would seem that Camden does not need to be so pressured as regards to the creation of such a tall tower to make the scheme viable.

We therefore **reject and object** to the proposal for this 11 storey tower block on the grounds of location, negative impact on the park + community centre + immediate neighbourhood, unnecessary height and density, dangerous precedent setting for other build locally, and lack of clarity over viability and funding.

- 2) **Affordable Housing:** We also support many voices in the community who are dismayed that only 4 affordable homes are to be provided, with only 1 social housing unit – although it is good this will be for disabled use. Sidings Community Centre recently received an email from Camden on 20th January consulting on Housing Allocations, stating there were 28,500 people on the waiting list, but only 1000 homes were on offer each year. Surely, therefore, Camden should be taking all opportunities – particularly when selling its own land – to ensure maximum increase of affordable housing, in line with its own policies. We believe that – as recommended in the London Plan, Policy 3.8 ...”Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings..” and ..” that affordable family housing is addressed as a strategic priority in LDF policies..” (We believe Camden's stated aim being 50%). It seems generally recognised that mix tenure developments build better communities and as a consequence, a better balance of affordable homes is needed.

We must remind ourselves that the private development on 65/67 Maygrove has 12 affordable units out of 92 dwellings (comparison of 13%).

We have also heard much in the news this week about lack of key workers in the care and health system, and families with older people needing younger members to remain in the community to help care for the ageing population. As this area will have a growing older population, retaining extended families in the area will become increasingly important. We therefore strongly support calls for a significantly increased affordable housing element, including more social housing, to help retain and encourage people committed to the community to stay and bring up families, and to bring/retain essential key workers in our neighbourhood such as nurses, care workers, and of course – teachers!

We would therefore have to **object** to proposals which have so little affordable housing on offer to the local community and urge Camden to reconsider.

- 3) **New Split-site School:** Sidings Community Centre supports the provision of a new school on the site. However, based on the expressed views of the majority of parents of young children using Sidings Community Centre, or those attending

meetings related to these proposals, we have several serious concerns over the split site proposals. These are:

- **Travelling distance between the 2 sites.** We have recently carried out a “Test Walk” between Liddell Rd and Kingsgate school. This was with one child (aged 5 in early Feb) and parent, who walked with local councillors, the community centre manager and an independent film-maker. This was a continuous uninterrupted walk at a steady pace on a Saturday, and it took 21 minutes. This was without having other considerations such as a buggy, other siblings, school bags, rush hour traffic to deal with, busy pedestrian flow around the arterial routes of Kilburn High Road or West End Lane in the morning rush hour. Liddell to Kingsgate is on a mainly downhill gradient as opposed to the reverse journey which is more uphill. All these considerations are likely to add another 4-5 minutes minimum, and most children will have to walk another 5-10 minutes to get to the first drop-off site. All in all, despite the staggered start and end times, some families may find it a daily struggle to make school on time if they have to use both sites. We believe that having tired and possibly late arriving children at the start of the day will impact negatively on their educational record and performance.
- **Catchment area/Admissions point:** we know that this is currently being consulted on with 3 options. It seems that a dual site admissions point is favoured to ensure children near to both sites can continue to use the expanded school. However, this does raise the question above of distance of travel for those children coming from the south part of the Kingsgate catchment area. Using the walking travel time experienced above, this could mean some young children using the new infant site would face a walk of some 40 minutes to get to Liddell Road which we believe is too far.
- **Need for “expanded” school:** One officer suggested that rather than facing a journey time of 40 plus minutes, some local families might chose another primary school. There is in fact a 420 place primary school (free school) due to open on the opposite side of Kilburn High Road – as near to Kingsgate as the Liddell Rd site. It is important therefore to ensure the need for this new school is really there, and that up-to-date recent birth rate figures are produced ahead of the relevant Development Committee meeting – to ensure patterns have not started to change as traditionally birth rates fluctuate. Although there are some larger residences to be built on the development, it is unsure as to whether local families will be able to “afford” such homes unless the affordable element is increased, so it remains to be seen how high the % increase is for family take-up on the Liddell site.
- **Separate School:** most parents have voiced the opinion that they would prefer a single 2 form entry school and are mystified as to why this cannot happen. When questioned, one of the architects admitted that it would be easy even within the current design to change the school to a separate 2 form entry. This could still be administered by Kingsgate and would continue to benefit from the excellent leadership and outstanding performance standards achieved by Kingsgate. We request that this could still be reconsidered within an expanded school framework and there are more successful comparisons of this type of model than those which are split by age groups. We also have concerns that as Sidings Community Centre has a 44 place nursery and that by placing the new nursery (offering 52 places)

and infant school in close proximity to us, this will be concentrating much of the early years provision in the north catchment area – leaving a huge gap in the south part of West Hampstead ward and Kilburn area. Again – a 2 form entry separate school would not create this problem and balance out provision where needed.

- **Traffic:** despite being officially “car-free” many local residents believe that in order to mitigate against distance between 2 sites, a significant number of parents will use cars which will lead to an increase in traffic along the narrow Maygrove Road, and that there will be jam-ups when parents drop-off children. If the planning is agreed, monitoring traffic rates should be incorporated into the planning agreement to ensure the lives of Maygrove Residents are not subject to undue and continuous traffic disruption in future. There must also be a traffic management plan to avoid the early pitfalls with the 65//67 Maygrove construction site, and ensure Maygrove and connecting roads do not grind to a halt with 2 way construction traffic.
- **Vibrations from heavy deep-pile driving:** having suffered serious vibrations during Thames Water’s construction of the excess floodwater tank in the area immediately east of Sidings, we would have concerns for the centre premises, and the residents of Maygrove Road opposite the Open space, where deep pile driving will happen at a raised height in close proximity to the houses. We will take photos of the premises at the park end of the centre to enable us to see if there is any damage. We would want to work with a construction management group to timetable such activity, to minimise disruption to our early years services and ensure young children so not suffer any disruption from undue loud noise or seriously heavy vibrations.

4) New School, Houses and Offices becoming part of Community:

As an active community hub, Sidings believes that it is important that the occupants of the new site - expanded school, residents and businesses - appreciate the new development sits within an existing, networked local community. However, the drawings and presentations have focused on the “new place” with the much valued Maygrove Peace Park and surrounding neighbourhood often portrayed in shadowed form, emphasising the feeling by some of the local community, that their voices, genuine concerns, suggestions and even identity are being disregarded or ignored.

The development drawings make much out of the connection to Maygrove Peace Park, which we welcome. We do believe that the old and new areas – ie existing Maygrove Peace Park, and Sidings Community Centre, the MILAM neighbourhood and eventually the new “high quality” development should be regarded as a combined site, as it has a fantastic potential to become a real “village” community in its own right.

For this reason, it is also important to take into consideration what the “new public open space or square” will be like at night, after school hours as all the drawings and focus of the experience of this new development has been of daytime use only. This is important for the new residents and those visiting or using the open space at night-time. We would like to request that drawings of the development at night and lighting proposals are provided to comment on before the planning application is submitted.

Active Partners: we believe that the school and Sidings Community Centre could form a highly effective and unique partnership. Sidings staff currently work in partnership with Beckford and Hampstead schools locally. However, it is important that Kingsgate appreciates that Sidings offers many children's services which currently includes being a Camden Children's Centre offering a wealth of Early Years services and parent training, plus after school and holiday activities for children aged 5 – 11 years. If the new school is agreed, we would expect to start a dialogue in the near future as to how the partnership with Kingsgate could progress. This is particularly important as regards to our Early Years Service, which we are concerned is not compromised in any way by the new school nursery provision. We believe that the school and Sidings could be mutually beneficial to each other and would want to build on opportunities identified.

Community Resources:

We are pleased that the school halls are designed to offer a new community resource within the neighbourhood. However, recent experiences by some in the community with other local primary schools have been less favourable. School premises can be expensive to use, restricted in their availability, with the profits going to the school and as expected, usage being determined by school procedures and possibly staff availability. We would ask that the community is involved in determining the terms of the community usage in order to have some sense of community ownership and control.

Proposal: We would like to propose, as we believe other groups have also done, that additionally or alternatively, some or all of the bottom floor of the office block space is given over to shared community use – including of course the business residents of the offices. This would provide a more flexible opportunity for shared usage, and bring all sectors together in some form of joint enterprise/shared space. It is also near to the sports and park facilities which we are hoping to develop and indeed Sidings is currently anticipating being a key partner to Camden in developing sports across the wider neighbourhood. As such it could provide a sports/social space as well as community use, exhibition, shared business suite for SME's in area, etc. It would provide a real connect with the existing park and newer residential and business units, to bring a real combined village feel, working well with our existing community facilities. It could also offer potential for park equipment in the event of a more local arrangement for running and maintaining the Peace Park. It could also help create a more vibrant feel to this part of the new site in out-of-school hours. It is hoped that this could possibly be funded through some S106 funding initially.

S106:

In recognition of the significantly increased level of potential local users – from Liddell Site, 65/67 Maygrove Rd, Iverson Rd developments – it is anticipated that Sidings premises and facilities will need extending to expand capacity for activity.

We have produced a draft Feasibility study which includes:

- Adaptions to hall with new children's toilets to provide more services for increased early years – especially drop-ins for young children. This will also allow

the centre more scope to develop activities for adults, and in particular older people, volunteer-led activity during the day.

- Redesigned reception area to provide for more volunteer input
- Creation of first floor community training hub with multi-media facilities
- Creation of small “cafe-in-the park” facility on park end of centre.

Costings as per feasibility study for phased build total (with some funds already earmarked from 65/67 Maygrove Rd).

Phase 1: 25,000 + VAT (Ground floor reconfiguration)

Phase 2: 35,000 + VAT (External cafe)

Phase 3: 180,000 + VAT (First floor)

Total = £288,000. (plus management and other miscellaneous improvement costs). We have already informed officers from Camden about the feasibility study with a view to discussing these proposals further.

Heritage: Sidings Community Centre has run successful Heritage Fairs for last 2 years, and believes it is extremely important that the history and heritage of the neighbourhood is reflected in the new development. We particularly liked the artistic manhole covers in the PDAS document – and would want to request that manholes or some other feature depicting trains and railway features are incorporated into the development to reflect the railway heritage of the site. We also think the site names should reflect the historical neighbourhood heritage - and that Liddell and Maygrove should feature – Maygrove Mansions already being used for the housing above Maygrove Rd. The community could have some say in overall name of site – Kingsgate is a recognised area down near Grange Park and it is important for this neighbourhood to retain its identity and also not confuse local people. The school may well become named locally as Maygrove or Liddell Primary site by local people to avoid confusion.

Maygrove Peace Park: in partnership with Maygrove Peace Park Friends Group, Sidings has long campaigned for the outdoor pitch to be resurfaced, similar to that in Grange Park. With greater emphasis on sports and fitness, we have also been approached by young adults for more free standing fitness equipment and an outdoor table tennis table. We believe increased fitness activities for this substantial additional community are vital, and a way of bringing the community together – so would support additional funding from S106 to be awarded to spend in the park. We believe that Maygrove Friends Group may also identify other enhancements to the park which might include upgraded play facilities and better pathway lighting, and possible funding for the wooded area immediately next to the proposed tower.

We are therefore submitting this response to the 2 planning applications as detailed above.

Yours sincerely,



E. Pearson,
Chair – Sidings Board of Trustees