

**From:** [REDACTED]  
**Sent:** 09 February 2015 10:06  
**To:** Planning  
**Subject:** 3rd Party Planning Application - 2014/7649/P

London Borough of Camden  
Camden Town Hall  
Argyle Street  
Euston Road  
London  
WC1H 8EQ

Our DTS Ref: 43868  
Your Ref: 2014/7649/P

9 February 2015

Dear Sir/Madam

Re: LIDDELL INDUSTRIAL ESTATE 1-33, LIDDELL ROAD, LONDON, NW6 2EW

#### Waste Comments

With the information provided Thames Water, has been unable to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application ahead of further information being provided, we request that the following 'Grampian Style' condition be applied - "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning [REDACTED] or by emailing [REDACTED]. Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality).

Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

#### Water Comments

On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

#### Supplementary Comments

Thames Water supports the surface water proposal to reduce flow to greenfield rates as outlined in the Flood Risk Assessment. We require a site drainage strategy that specifies point(s) of connection for both foul and surface water into the combined sewer system. We anticipate that the proposals will yield a net decrease in flow into the public sewer system, but due to the large variability of the size of the local sewers we need to ensure that the proposed point(s) of connection do not increase localised flows to levels that have the potential to cause property flooding.

Yours faithfully  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,  
Rickmansworth,  
WD3 9SQ



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**Camden Council Customer feedback and enquiries**  
**Comments on a current Planning Application - Ref. 9948811**

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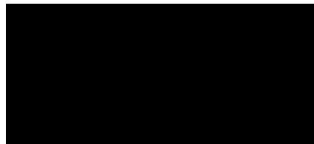
**Planning Application Details**

Year 2014  
Number 7649  
Letter P  
Planning application address Liddell Road NW2

Title Mr.  
Your First Name Jack  
Initial J  
Last Name Anderson  
Organisation  
Comment Type Object

Postcode  
Address line 1 22 Landau House  
Address line 2 5 Chatsworth Road  
Address line 3 Brent  
Postcode NW2 4BW

E-mail  
Confirm e-mail  
Contact number



Your comments on the planning application

I agree with objections to proposed planning applications 2014/7649/P and 2014/7651/P which will have a dramatic affect on the character of Maygrove Peace Park and the ambience of Maygrove Road.  
The tower block is inappropriately tall and the lack of adequate vehicle parking facilities will lead to nuisance parking in the Sidings area. Recommendations for block relocation and an increase in affordable homes should be considered.  
Travelling between Liddell Road and Kingsgate School appears to be a non-starter and separate 2 form entry

## Camden Council Customer feedback and enquiries Comments on a current Planning Application - Ref. 9948811

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### Planning Application Details

appears a logical alternative.  
Much of the proposed development is beyond what is necessary and fails to take into account aspects of planning policy and the Neighbourhood Plan.

**If you wish to upload a file containing your comments then use the link below**

No files attached

### About this form

Issued by	Camden Council Customer feedback and enquiries Camden Town Hall Judd Street London WC1H 9JE
Form reference	9948811

**From:** Fowler, David  
**Sent:** 13 February 2015 08:41  
**To:** Planning  
**Subject:** FW: 2014/7649/P - Phase 1 Liddell Road redevelopment

Please upload.

D

David Fowler  
Principal Planning Officer

Telephone: 0207 974 2123

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**From:** Guy Shackle [REDACTED]  
**Sent:** 12 February 2015 23:38  
**To:** Planning  
**Cc:** Fowler, David  
**Subject:** 2014/7649/P - Phase 1 Liddell Road redevelopment

Whilst the provision of new primary school places is welcomed the proposed split site expansion of Kingsgate appears contrived. In view of scale of development deemed necessary to fund the new school building it would appear sensible to provide a 2FE primary and nursery on this site as a 'sister' provision to that found at Kingsgate. The arrangement would provide much clearer admissions arrangements and provide a focus for the community of Iverson, Maygrove, Fordwych Roads and Sidings Estate is defined and confined by physical boundaries of the existing railway lines to the north and south.

A school site that caters for pupils aged 3-11 could then also utilize the existing Multi Use Games Area in the Peace Park during the day. The arrangement would also minimize the need for parents with young children to have to move between the two sites and perhaps form better links with existing nursery provision in the Sidings Community Centre.

The school building as currently designed will have a very low visibility in the community both screened and shaded by the much larger scale housing development which might be better placed forming an acoustic buffer to the noise of the railway lines (as successfully achieved at the nearby Grade II listed Rowley Way)

The loss of the light industrial space is regrettable and it appears that there has been little done to find alternative premises in the area which would keep the existing businesses in the area.

**Guy Shackle** - local resident

24 Brasseley Road, London NW6 2BE

**Kingsgate Primary School**  
**Supporting statement**

**Phase 1 2014/7649/P Construction of new school buildings for Kingsgate Primary School for pupils aged 3 to 7 years old**

As Headteacher - with the full support of our Governing Body, I welcome the opportunity to expand Kingsgate Primary school and provide new school primary places in a popular and outstanding school. The new buildings at Liddell Road provide an ideal opportunity to create an environment tailored to the needs of early years and KS1 (infants).

We have worked closely with the architects to plan for the building we need. We are confident that the proposed design at Liddell Road will enhance the school's teaching and learning to ensure pupils who attend this school achieve academically as well as they can.

The rationale behind organising the two parts of the school into phases rather than grouping pupils vertically is based on sound educational principles.

There are many benefits to having a year group physically all in one place. At Kingsgate Primary school teachers work collaboratively in year group teams to plan lessons and to assess pupils' work and progress. Teachers within the year group share good practice and newer teachers can benefit from working closely with experienced teachers. As a larger year group team we have the capacity to be more flexible about how we organise groups of pupils and use our resources. For example, as an important part of our reading programme, pupils from across the year group are organised into small groups geared towards their own particular needs and they are taught the important skills of learning to read on a daily basis. Having a larger cohort allows us to really fine tune the groups and their particular academic needs.

In terms of resourcing it is more cost effective to have all the resources appropriate for a particular age range in one place to be shared and used for the benefit of pupils, rather than duplicating resources across two separate sites.

Nursery and Reception pupils have particular requirements when it comes to their physical space as they need all day access to an outside classroom. The school has been closely involved in planning for our youngest pupils high quality fit for purpose outdoor classrooms which will greatly enhance their learning. The current school dating from Victorian times was built in an era when young children were taught in a very different way. We are very pleased that moving our Early Years Foundation Stage to a new building will allow us to provide great opportunities for pupils to learn without any constraints of space or access to the outdoors.



Regarding the management of playtimes where there are pupils from a narrower age range, it is easier to provide equipment and activities fit for purpose and suitable for the age group concerned.

Much of our professional development for staff takes place in school, through working with external consultants, working with the leadership team, observing lessons delivered by colleagues, planning lessons and assessing pupils' progress with subject leaders. If teachers in the same year group were physically divided over two sites this would reduce our capacity to provide excellent on-going professional development.

Kingsgate Primary School will continue to be a very close knit community and we work in partnership with our parents to make sure that the pupils who attend this school achieve academically as well as they can.

**Phase 2 new housing and workspace 2014/7651/P construction new housing and business units, along with the landscaping and external works**

We like the design of the housing and employment space. The new open space and links to the park and local children's centre will complement the school and provide a high quality environment for the children and families at our school.

Liz Hayward

Headteacher

10<sup>th</sup> February 2015

**From:** Mark Stonebanks [REDACTED]  
**Sent:** 12 February 2015 17:49  
**To:** Planning  
**Subject:** Liddell Road 2014/7649/P

Dear Camden Planning Department (David Fowler),

I have already submitted comments on this application but said I would submit further comments on the scheme. Here they are.

### **The School**

In some senses there is little to comment on the school - Camden seemed to have spared little expense on their plans for the school, the design is nice, as is the landscaping. However, recent experience in West Hampstead suggests being cautious as lovely pretty plans submitted at the application get watered down (e.g. 'design and build') and by the time the building is finished it is not what was promised. This is our experience with Emmanuel School. Indeed talking to architects from Hawkins Brown they have disowned Emmanuel school as what was built was not what they designed.

At this point is a link to a photo survey undertaken by the West Hampstead NDF of local (recently built) buildings. We collated a love it/loath it scale and ranked them on that basis. The aim is to see what works and what doesn't work with a view to informing planning decisions and our plan.

[REDACTED]

You can see for example how unpopular Emmanuel School is (indeed I was somewhat surprised at the degree) mainly because of the brick colour. The proposed new school is - from the plans, but this can change.... better. However, behind Emmanuel School the plans for landscaping of the school grounds and surrounding area were also altered and it ended up being a wasted opportunity. There are lessons to be learned for Camden on this (and the proposed school), but I fear they won't be.

Also of note it that the two most unpopular buildings in West Hampstead are both Camden built, the Travis Perkins Building (156 West End Lane) and Ellerton. Residents of West Hampstead, like people everywhere, don't like high rise towers. Density, yes - we are one of the original homes of the mansion block, but towers, no.

### **Density of the School**

It appears that the school isn't being built very densely. For example the Liddell Road site is split (roughly) into two parts. The school which is c. 2,300m<sup>2</sup> of buildings on about 4,800m<sup>2</sup> and the housing and offices 13,000 m<sup>2</sup> in total on about the same area - so the housing/offices are build roughly 6 times more densely than the school site. This seems out of balance. Particularly since the CIP programme states that redevelopment of Camden sites will involve 'difficult choices'. It doesn't seem that Camden are taking any difficult choices in their plans for the school.

There are two ways in which the site could have been developed more densely. I'm not entirely sure of the maths but if a separate school (i.e two or three form entry) had been built for 3 to 11 year olds then the school could have had a third or fourth floor for the same footprint (or used a smaller footprint). Using a smaller footprint would have allowed the rest of the development built the same amount of housing (and profit) to built less densely (or more housing) or a combination of both.

It is also not clear if the outdoor space for the school is in relation to the guidelines - if it is above perhaps the space could have been allocated more efficiently (those difficult choices again).

Or - and this is still possible - some of the housing or office space, could be built over the two entrance school buildings - there are three floors of airspace available enough to shift some housing from the tower, reducing it's height and still build extra housing. The footprint of each building alone is sufficient to take three stories from the tower and the other could be used for extra housing.

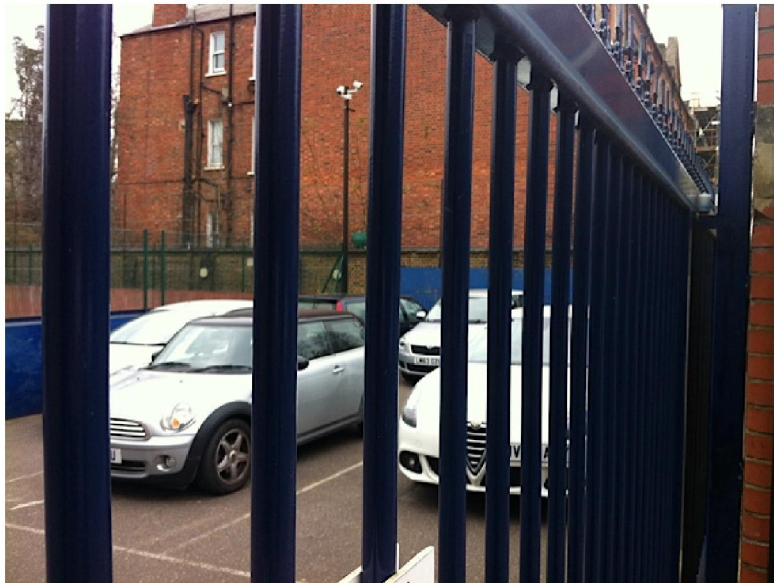
I don't know if you saw the earlier feasibility studies but at that stage it still retained the road through the scheme. This application has switched the entrance around and swallowed up the road into the school. In principle this is not a bad idea but I note that all the benefit has gone to the school with no extra space for the housing and offices - in fact they have lost space.

In the earlier scheme the site for the school was on the Maygrove road side - away from the railway. In this application it now runs along side the railway. This is odd because the railway has regular diesel trains from the Midland Mainline. This is a cause of poor air quality and a potential danger for health, particularly for 3 to 8 year olds. In the London air quality map the railway line is marked as amber/red as a result. Yet there is no mention of the Midland Mainline trains in the air quality report. Odd.

Finally, I would point out that the Council seem to be basing their application to expand Liddell Road on the basis of reasonable results as a result of the leadership of the headmistress. I haven't been into the school but the grounds do seem well kept, which is a good sign (and evidence of her leadership). But if that is the case I'm puzzled as to why there was such a poor response from parents at the school to the original consultation. Only five responses (of which two were against!) expansion. It also doesn't inspire confidence that the admissions catchment area hasn't been sorted out at this late stage. And of course there is a danger on basing an application around one person - they may leave in which case will another person be able to manage the school?

### **Parking**

As I mentioned in my previous comment I am deeply concerned about the impact of parking of this application. It appears that there is insufficient parking proposed. For example below is a photo of Essadine Primary School (475 pupils in Maida Vale) there are seven staff cars parked in a sectioned off area of the playground. Beckford School in West Hampstead, with a similar number of pupils has a similar number of cars. The application suggests that the proposed 420 pupil school - a split site no loss - will only require two car parking spaces. I don't think so.



### **Trees /Ecology**

It seems odd that the application proposes making no improvements to the Maygrove Road embankment - since the ecology report points out that there is a Japanese knotweed problem. When you make a site visit I suggest you take a look at the embankment - I think it looks a mess and needs improvement. I suggest you recommend it.

On a wider scale I would point out that one of the things that is missing for the growth area is a (outline) masterplan for development and for the green spaces in and around the buildings. It seems more than odd to me that while saying 'we have no money' Camden have refused to do any masterplanning for the growth area, they have at the same time been spending a huge amount of money on masterplanning for Liddell Road. We are not quite sure how much because our freedom of information request has not been answered yet, but I expect well into six figures. All in all rather poor planning.

You have a difficult decision to make. There will be no doubt pressure brought to bear on you to approve this application (unless the decision has already been made before the process began). However, one has to have faith that this application will be viewed independently, as if it was submitted by a private developer. In that case I think there are several grounds for not recommending approval.

I would like to end by saying that as I am sure you will agree the planning system isn't working. It is far too adversarial and 'consultation' is a farce. NDFs may not be perfect but they were an attempt to come up with a different model. We have put a huge amount of work to develop our NDP, it's not perfect, but it's not bad. One message that came through loud and clear was that people did not want tall buildings in area. The NDP reflects that I hope you bear this in mind when reaching your decision. They do accept that there will be intensification and denser building in the growth area but they have also - for years - been

asking for an outline masterplan; of green and public spaces, and of rough heights and volumes. Camden cannot on the one hand identify West Hampstead as a growth area - secondly only to Kings Cross in the borough - but then not engage at all in how it will be developed. Particularly given that they are also owners of the two of the significant sites. But actually this isn't true, only 156 is in the growth area. The Liddell Road site is NOT in the designated growth area. To me this is a significant factor for consideration.

Yours sincerely,

Mark Stonebanks  
sent in a personal capacity.  
Committee member of West Hampstead NDF

**From:** James King [REDACTED]  
**Sent:** 12 February 2015 23:05  
**To:** Cornwall-Jones, Kate  
**Cc:** Janet Grauberg; Planning  
**Subject:** RE: Liddell Road planning application and admissions consultation update

Dear Kate

I have just submitted comments online regarding one of the Liddell Road planning applications (2014/7651/P). I had understood that comments on both Liddell Road applications would be accepted until 12 February. However, it appears that it is no longer possible to submit online comments regarding the school application (2014/7649/P). So I have pasted below the comments below from Kilburn Liberal Democrats on the school application, in the hope that you are still able to consider them as part of the planning process.

Best regards  
James

*We have consistently campaigned for the provision of a new primary school for Kilburn and West Hampstead. However, the Council's proposed approach to this development is not in the best interests of parents and children.*

*Instead of facilitating a new choice of school, the Council decided instead that the new Liddell Road building should be a second site for an expansion of Kingsgate school. We are concerned about developing a new school building designed for infant children only, on the basis of pursuing this unusual split-site model. Parents with children at both sites will face a walk of over 20mins, including negotiating the very busy West Hampstead interchange when dropping off and collecting their children.*

*In addition, we note there is continuing uncertainty regarding the impact of a second site on the admissions policy for Kingsgate school. The Council has only recently included a question about Kingsgate in a consultation about admissions policy for Camden schools.*

*This is a very important issue for Kilburn parents and the Council's position on admissions should have been made clear before it made decisions about the split-site model and put forward a planning application on that basis.*

*It seems the admissions point for Kingsgate school might move north to the new Liddell Road site. We are worried this could make it more difficult for parents in the 'southern' parts of Kilburn ward – such as the Alexandra/Ainsworth, Abbey and Mortimer estates – to secure a place for their kids at Kingsgate.*

*We suggest the committee should postpone making a decision about this application until the outcome of the admissions policy consultation, and the implications for Kilburn parents, have become clear.*

*James King and Janet Grauberg  
Kilburn Liberal Democrats*

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**From:** Cornwall-Jones, Kate [REDACTED]  
**Sent:** 12 January 2015 19:06  
**Subject:** Liddell Road planning application and admissions consultation update

Dear Resident,

Last year Camden agreed to expand Kingsgate Primary School, based in Kingsgate Road NW6, to provide 420 new primary school places. A new school building for children aged 3 to 8 years old will be built in a mixed use redevelopment at Liddell Road, subject to planning consent and consultation on admissions arrangements. The project is part of Camden's Community Investment Programme (CIP). Making sure Camden has enough school places is one of our highest priorities for the CIP.

**Camden Council submitted planning applications for the redevelopment of the Liddell Road site in December 2014.**

You can find out more about the planning applications and how to comment here: [www.camden.gov.uk/liddellroad](http://www.camden.gov.uk/liddellroad)

Consultation for the planning applications will be open until 30 January 2015.

**Camden Council is also consulting on arrangements for admission to primary and secondary schools in September 2016.**

The Council has to consult each year on co-ordinating school admissions and proposed arrangements for admissions to community schools. Included in this year's [consultation document](#) are some important changes regarding [Kingsgate Primary School](#). You can find out more about this consultation and how to comment here: [www.camden.gov.uk/admissions](http://www.camden.gov.uk/admissions)

Comments on the school admissions arrangements should be sent to [REDACTED] by 6 March 2015

**Officers from Camden's Children Schools and Families** will be available to answer your queries and explain the proposals:

• **Wednesday 14 January** from 5 - 7.30pm at West Hampstead Library

• **Thursday 15 January** from 5-8.30pm at Sidings Community Centre

Kate Cornwall-Jones  
Senior Development Manager  
Strategy and Resources  
Children Schools and Families  
London Borough of Camden



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London N1C 4AG

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