

Your Ref: 2014/4332/P

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FAO: Mr Gideon Whittingham  
Development Management  
London Borough of Camden  
Camden Town Hall Extension  
Argyle Street  
London  
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Dear Gideon,

**APPLICATION FOR REMOVAL OF CONDITION 10 (DETAILS OF SEDUM ROOF)  
AND VARIATION OF CONDITION 11 (RAINWATER HARVESTING) ATTACHED TO  
PLANNING PERMISSION REFERENCE 2014/4332/P (APPROVED ON 27/01/2015)  
IN LINE WITH S73 OF THE TOWN AND COUNTRY PLANNING ACT 1990**

**2014/4332/P:** Engineering works to the Hampstead and Highgate Chains of ponds comprising dam raising at Model Boating Pond (2.5m) and Mixed Bathing Pond (1m), new walls along dam crest to increase the height of the dams at Men's Bathing Pond (1m) and Highgate No.1 Pond (1.25m), a 0.19m kerb along part of the crest at Hampstead No.2 Pond, a new flood storage dam (5.6m) in the catchpit area, grass-lined spillways at most ponds, dam crest restoration, pond enlargement at Model Boating Pond, a replacement changing room building at Ladies Bathing Pond and associated landscaping, habitat creation and desilting.

**LOCATION:** HAMPSTEAD AND HIGHGATE CHAINS OF PONDS, HAMPSTEAD HEATH, LONDON

On behalf of our client, the City of London, we are applying for the removal of Condition 10, which requires details of the sedum roof, and Condition 11 which requires an energy strategy demonstrating consideration as to how the proposal will seek to meet the 35% carbon dioxide target beyond Part L and details of rainwater harvesting system.

## **Removal of Condition 10: Sedum Roof**

Condition 10 requires the submission of the following information:

*Prior to the first use of the replacement Kenwood Ladies' Pond Changing Facility a plan showing details of the sedum roofs including species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the sedum roofs, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. The sedum roofs shall be fully provided in accordance with the approved details prior to first use of the replacement Kenwood Ladies' Pond Changing facility and thereafter retained and maintained in accordance with the approved scheme of maintenance.*

*Reason: To ensure that a green or brown roof is suitably designed and maintained to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with the requirements of policies CS13, CS14, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23, DP24 and DP32 of the London Borough of Camden Local Development Framework Development Policies.*

### **Reason for request to remove condition**

It is proposed that the requirement to provide a sedum roof is removed for the following reasons:

1. One of the main purposes of a sedum roof is to attenuate the flow from an impermeable roof before it reaches the drainage system. In this case, any run-off from the roof of the structure of the replacement changing facility would go straight into the pond over which the building sits. There will be no increase in discharge into the drainage system as a result of this building. The ponds themselves will be able to store much more water back and so the level of overall attenuation is actually increased when considering the project as a whole. From an environmental point of view, it is much better to have the water in the pond to ensure that the water levels are maintained.
2. Sedum roofs can provide the opportunity to enhance urban areas with limited wildlife habitats. However, the proposed replacement changing facility is located within a vast expanse of trees and heathland with a large amount of existing natural habitat. A sedum roof will add limited additional ecological benefit to this area and may introduce non-native species which could be detrimental to the very delicate balance of the Heath's ecological habitat.
3. The buildings are of a modular construction and as each set of building comprises a number of modules the junction between each module needs to be sealed on site. For technical reasons a green roof system is not conducive in a situation where roof joints have to be sealed on site.

When considering these reasons, in conjunction with the sustainability impacts of constructing and maintaining a sedum roof, we do not believe that a sedum roof is the most sustainable option in this location. The benefits of a sedum roof would be significant within an urban setting but not on a small changing facility over a pond in the middle of a large Heath.

## **Pre-application discussions**

We corresponded with Gideon Whittingham from the London Borough of Camden Planning Department in October and November 2015 in relation to this issue. He confirmed that the Council was unlikely to require the sedum roof in this situation but sought details of the colour/materials we proposed for the roof. This information has been included within the details recently submitted to discharge Condition 7 (d and e).

## **Removal of Condition 11: Energy Strategy and rainwater harvesting**

Condition 11 requires the submission of the following information:

*Prior to the commencement of building works associated with the replacement Kenwood Ladies' Bathing Pond Changing facility, an energy strategy demonstrating consideration as to how the proposal will seek to meet the 35% carbon dioxide improvement target beyond Part L 2013 shall be submitted to and approved by the local planning authority. The strategy will include full details of the rainwater harvesting tanks proposed. The Kenwood Ladies' Bathing Pond changing facility shall thereafter not proceed other than in complete accordance with all the measures as recommended in the approved strategy which shall be permanently retained thereafter unless agreed in writing with the local planning authority.*

*Reason: in order to secure the optimum energy and resource efficiency measures in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.*

## **Reason for request to remove the condition**

*Energy Strategy demonstrating 35% carbon dioxide improvement beyond Part L*

The proposed size and use of the facility means that it isn't possible to demonstrate a 35% carbon dioxide improvement beyond Part L. Jonathan Greenwood, building control officer at City of London Council, has confirmed that the proposed development is exempt from Part L due to its size and the fact that part of it is not heated.

However, we are able to demonstrate increased sustainability compared to the previous facility:

- As a design approach a fabric first low energy solution has been employed;
- The building services systems incorporated meet the requirements set out within the Non-Domestic Building Service Compliance Guide;
- The systems are highly efficient and controllable, they allow a comfortable environment when occupied but demand less energy when the building is not occupied (Passive Infrared activation which prevents items that consume power being left on if no-one around);
- The use of low energy (LED) light fittings and low flush toilets will reduce the energy requirements for the building and water consumption;
- The larger windows will reduce energy requirements for internal lighting;
- The buildings have been constructed off-site which expedites construction time saving on all forms of energy whilst minimising air, water and soil emissions and the production of waste. It also results in a higher quality build;

- In addition to the speed of construction, quality control on matters such as insulation is better thereby improving thermal efficiency;
- The facility will offer improved accessibility with provision of disabled access and disabled changing and toilet facilities.

### *Rainwater Harvesting*

A project of this size and scale with 6 x WC's does not lend itself to a rainwater recycling system. To allow the tank to be sized suitably for a 365 day operation (which is required for a tank to be warranted) the tank required would be in excess of 10,000 litres, this would need to be located underground, with the high water table in this area it would be subject to flooding which would cause ongoing issues.

Such a system has both capital and maintenance on costs, the maintenance required on such systems with the tanks and pumps being located below the ground will be prohibitive to the facility which is occasionally used. Overall the application of rainwater harvesting is not appropriate for this building.

### **Pre-application discussions**

We corresponded with Gideon Whittingham and Amy Farthing from the London Borough of Camden Planning Department in October and November 2015 in relation to this issue. It was acknowledged that rainwater harvesting may not be suitable in this situation, however the following information was requested:

- *Projected water use of the 6 wcs in the changing rooms (l/d) – please also state key assumptions.*
- *Projected rainfall that could be collected (l/d) – please also state key assumptions.*
- *The depth below ground level that you believe the water table to be in this area (m)*

The counter for the Ladies' Pond shows approximately 88,000 visits per year. This is extremely variable with only a few visits per day on the colder winter days.

Using the rainfall data collected from Kenwood Yard we collected 530.20mm total rainfall last year. Over a roof area of 147.61m<sup>2</sup> this equates to 214.42 litres per day. A chart illustrating estimated water usage is included with this application.

We can access borehole data for the location but the depth of the water table is not considered relevant in this situation as the building and supporting slab are directly over a clay dam and pond. Any rainwater in the building footprint will be directed straight in to the pond and then flow through the Highgate Chain of Reservoirs. It is preferable to have the water in the pond to ensure that the water levels are maintained.

### **Fees**

The application fee of £195 will be paid by credit card over the telephone.

If you require further information, or have any queries regarding the application, please contact me on 0203 214 8889, 07808765495 or joanne.farrar@atkinsglobal.com.

Yours sincerely  
For and on behalf of Atkins Ltd.

A handwritten signature in black ink that reads "Joanne Farrar". The signature is written in a cursive, flowing style.

Joanne Farrar BA (Hons), MCD, MRTPI  
Associate Planning Consultant