

From: Karen Beare [REDACTED]
Sent: 21 March 2019 01:29
To: Thuairé, Charles [REDACTED]
Cc: Bob Warnock [REDACTED]; Harley Atkinson [REDACTED]; Kathy Lambie [REDACTED]
Subject: 2019/0704/P - SUDS and drainage

Charles

FPRA has the following concerns regarding the discharge of Condition 13 of planning permission 2018/2104/P:

On page 1 of the report, it is stated the existing site is sloping towards an existing pond and the new development will discharge to the existing pond and infiltrate water into the ground using the same principles as would occur naturally in the environment. Yet on page 2, it is confirmed the "Made Ground" has not yet been tested for infiltration potential so this initial statement is meaningless.

Furthermore, this report wrongly assumes the perched water table is entirely infiltrated surface water. Groundwater is discounted, yet on adjacent neighbouring sites there are numerous groundwater springs fed by ground water travelling through the upstream Claygate Beds and Bagshot Sands. Indeed the pond in No55 is spring fed itself, a fact confirmed by the current owner in 2008.

As part of the site description, the historic pond in neighbouring No55 Fitzroy Park, which is the cause of great ecological concern for stakeholders and the City, is given no more than a mention as simply a potential container for high rainfall "exceedance events" should any rainfall event prove to be too much for their drainage design. There is no mention of the sensitive nature of the pond in No55 and how it sits within the established Highgate chain feeding the Bird Sanctuary Pond downstream. Any change in the flows into this pond will have a knock-on effect on the wetland habitats in Bird Sanctuary.

Nor is there any mention of the impact of cumulative development of the site with an extensive basement and SUDs directly next door and upstream at 51FP. In fact the SUDs at No51 lie directly parallel to the SUDs proposed at No53, but have not been considered or assessed given their close proximity. Nor has the basement directly upstream at 1 Fitzroy Close been considered or assessed. Both should be factored into any modelling of such drainage solutions as is required by Camden Basement Policy.

It also appears the proposed swales and retarding/detention basins do not cross reference with arboricultural report. I am sure Tom Little will confirm it is impossible for mature trees, planted to replace those removed and to act as a screen for No51 (as is proposed), to grow successfully in either swales or detention basins.

It is also very disappointing, that after so much time has passed, infiltration test results are not available, so this entire SUDs scheme, at this late stage, is based entirely on assumption and not fact. Other assumptions include the site being flat when it is in reality steeply sloped.

The report states "Detailed modelling would be completed at a later stage once the infiltration potential is confirmed and individual components can be tested" and "when the infiltration

test results become available it will be possible to design and model the entire drainage system in full, including intermediate control structures.”

We had understood the purpose of this Condition 13 was for the Applicant to provide reliable details and calculations based on fact so that stakeholders can comment on the final drainage design. It begs the question when exactly is “a later stage” proposed and how the Council will be able to exercise control over the drainage scheme once this Condition is discharged on vague assumptions.

Finally, drawing L2368 –SK-C-007-SUDs shows a rainwater overflow connection to neighbours manhole and to the pond if infiltration rates are very poor. This would have a detrimental impact on the local water regime. This drawing also shows where Swales and detention (infiltration) basins are to be site exactly where replacement trees are intended to be planted, which is clearly not tenable.

As a matter of courtesy, I have copied in Bob Warnock given this potential impact on the Heath downstream.

Kind regards
Karen
Chair FPRA

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