SCANNED LETTER BY EMAIL

Our Ref: 1845/25/DR/bl
1675/118

Alan Baxter
INTEGRATED DESIGN

75 Cowcross Street
London EC1M 6EL

t 020 7250 1555

e aba@alanbaxter.co.uk
w www.alanbaxter.co.uk

FPRA
c/o 49 Fitzroy Park
Highgate
London
N6 6HT

11 October 2019

Dear FPRA

55 Fitzroy Park

Thank you for your email regarding the drainage information that has recently been uploaded onto the planning website. We have, as you requested, looked at this and our comments are as follow:-

a) The covering letter and page 1 of the Coyle Kennedy report indicate that Bob Warnock agreed on 10 May 2018 that the current discharge across Millfield Lane could be eliminated and a new pipe installed from the attenuation tank and swale beneath the road to an outfall, with a stone diffuser, in the nature reserve on the heath. We have seen no evidence or correspondence to support this and the correspondence that we have seen from CoL indicates that they would not support the discharge of water onto the heath.

b) The covering letter responds to a request from the Camden LLFA for outline flood mitigation measures for plot 4 and 5 by including a copy of section 7.8 (Risk Evaluation) of the proposals included in the Hydrological & Hydrogeological assessment. Essentially local landscaping is proposed to direct surface water flooding away from plots 4 and 5 to the existing run off route from the pond. This is all still very vague and unclear how the levels will work and we note that the runoff water is now to be collected and fed into the proposed swale along the boundary with Millfield Lane.

c) Section 2-2 on drawing P -300 rev. B indicates an overflow pipe out of the top of the attenuation tank. If this is the only discharge pipe (and the drawing doesn't show any others) then the tank will fill up and then provide no further attenuation. This overflow pipe is also connected to the swale, which is shown outside the site boundary, under the road. If, as it appears, the swale is to be excavated below the road then the ownership of Millfield Lane should be clarified and confirmation sought that this has been agreed with the relevant authorities. We would also query whether the impact of the excavation of the deep swale on the roots to the retained trees on both sides of Millfield lane has been fully considered and agreed?

2/...

d) The drainage proposals are very complex, extensive and congested. A number of figures (diagrams) are included in the report to show more clearly how the drainage to the car parking areas, access paths and the foul water network are dealt with. It would be useful if further separate figures could be produced to show how the pond, blue/green roofs and land drainage are dealt with. Drawing P301 rev. A seems to indicate that the land drainage around plots 1 to 3 peters out in the retained and reinstated orchard. The developer should clarify the details and what happens to the ground water.

e) The foul water flows (possibly incorporating some storm water flows) which currently pass below the tennis court are to be collected in a chamber and pumped, with the foul water from plots 4 and 5, up to Fitzroy Park where they are combined with the foul water flows from plots 1 to 3 and the storm water from the parking areas before discharging into the combined public sewer in Fitzroy Park. This represents a significant increase on existing flows which will need to be agreed with Thames Water or Camden. It is unlikely that either would be prepared to take on the responsibility for the pumping chamber and rising main. This would therefore be a private sewer with associated costs, which may have implications for the owners of properties connected to the sewer.

f) The original intention was to keep the proposed groundwater regime on the site the same as the existing. Given the complexity of the proposed arrangements it would be extremely difficult to demonstrate that this can be achieved. What was originally a very natural environment within a large garden area is now heavily controlled and engineered because of the extent of development on the site. A lot more water will be drained to the attenuation tank and to the swale which then discharges via a drain under Millfield Lane into the Heath. There is a risk that this could lead to contamination of the Ponds.

g) The potential impact on the ground water regime in the temporary condition during construction is also likely to be extensive because of the scale of the proposed groundworks, which now includes the excavations for the attenuation tank and the pump chamber. The risk of contamination of the groundwater, feeding the pond and the nature reserve therefore remains high.

I trust that our comments are clear, but if you have any queries or would like to discuss any points in more detail please give me a call.

[redacted]

David Rathbone
for Alan Baxter Ltd