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Dear Sir/Madam

369-377 Kentish Town Road, NW5 2TJ
Application to Discharge Conditions 10 (Piling Method Statement), 26 (London Underground Structural Matters), 27 (Revised Energy Statement), 28 (Revised Sustainability Strategy) and 29 (Solar PVs) of Planning Permission Ref: 2019/0910/P

On behalf of the applicant, KTR Carwash Project Ltd, we are instructed to apply for the discharge a number of conditions placed upon an existing planning permission.

Planning permission was granted on 12 March 2020 (Ref: 2019/0910/P) for the following development at the above named site:

Redevelopment including change of use from car wash (Sui Generis) and erection of part six and part seven storey building plus basement to provide 14 flats (10 x 2-bed units and 4 x 1-bed) (Class C3) at 1st floor and above (with terraces at 5th floor rear and 6th floor level (north elevation); and retail (Class A1) or restaurant (Class A3) use at ground and basement level incorporating widened pavement to Kentish Town Road.

In allowing the above permission, a total of 33 conditions were imposed. This application provides details to discharge **Conditions 10, 26, 27, 28 and 29**.

In support of this application, please find enclosed:

- The completed application form;
- A copy of Decision Notice ref: 2019/0910/P, dated 12 March 2020; and
- Supporting documents relevant to each condition as described further below.

The relevant fee of £116 (plus £25 administrative fee) will be paid via the Planning Portal.

Content of Submission

Condition 10 states

Prior to commencement of any impact piling, a piling method statement shall be submitted to and approved in writing by the local planning authority. The Method Statement shall be prepared in

consultation with Thames Water or the relevant statutory undertaker, and shall detail 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. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

A Summary Note has been prepared by Price & Myers and is submitted together with ancillary structural drawings, an assessment of fire hydrant locations and correspondence with Thames Water in regard to their assets adjacent to the site.

The most relevant statement made is that it is not proposed to undertake any impact piling. Construction of piles will instead be completed using a bored continuous flight auger. This methodology therefore immediately addresses any factors related to impact piling by removing it as a construction method.

Notwithstanding this, relevant detail of nearby utility assets, including those of Thames Water, are provided for reference. The approach to construction on this site has taken account of these matters from the outset and therefore already forms part of the overall method statement within the Basement Impact Assessment that forms part of the permission's approved documents.

The intended approach to piling is therefore appropriate for this site.

Condition 26 states

The development hereby permitted shall not be commenced until detailed design and method statements (prepared in consultation with London Underground) for basement construction only have been submitted to and approved in writing by the local planning authority which:

- *provide details of basement construction*
- *accommodate the location of the existing London Underground structures and tunnels*
- *accommodate ground movement arising from the construction thereof*

A Summary Note has been prepared by Price & Myers and is submitted together with ancillary correspondence with London Underground (LUL) and both a plan and section of the proposed development with reference to LUL assets (running tunnels for the Northern line) within proximity.

The correspondence with LUL confirms that LUL's engineers are fully satisfied that the basement construction activities will have no impact upon their assets and do not need to be further consulted on the project.

This therefore satisfies the requirements of the condition with regard to LUL. All other elements of construction and ground movement are already included within the Basement Impact Assessment that forms part of the permission's approved documents.

Condition 27 states

Prior to discharge of the s106 Energy Efficiency & Renewable Energy Plan, a revised energy statement shall be submitted to and approved in writing by the local planning authority. The revised energy statement shall include the following:

- i. Confirmation of the proposed heating strategy;*
- ii. Improved CO2 reduction (CO2 reduction as close to 35% reduction as feasible); and*
- iii. Demonstrate feasibility of increased renewable energy capacity.*

Condition 28 states

Prior to discharge of the s106 Sustainability Plan, a revised sustainability strategy shall be submitted to and approved in writing by the local planning authority. The revised sustainability strategy shall include the following:

- i. Confirmation of sustainable construction and design principles from Policy CC2 and CPG 'Energy Efficiency and Adaptation';*
- ii. Demonstrate feasibility of green roof compatible with solar PV; and*
- iii. Confirmation that the active cooling functions of the MVHR and ASHP systems are permanently and irreversibly removed or disabled.*

Condition 29 states

Prior to discharge of the s106 Energy Efficiency and Renewable Energy Plan, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells, heat pumps and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of meters to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system (including safe roof access arrangements) shall be provided. The equipment shall be installed in full accordance with the details thus approved and permanently retained and maintained thereafter.

Given the linkages between these various elements, a single Energy and Sustainability Assessment has been prepared by Peter Deer and Associates to address Conditions 27, 28 and 29. The key outcomes from that assessment are:

- With regard to Condition 27:
 - o It is proposed to use exhaust air source heat pumps for heating and hot water. When this is combined with the PVs on the building's roof, CO2 reductions of 46% from renewables and 49% overall are now being proposed, in excess of the minimums required by policies.
 - o Remaining reductions to achieve 'zero carbon' will continue to be provided via carbon offset payments.
- With regards to Condition 28:
 - o A schedule of sustainable construction and design principles in accordance with Policy CC2 is provided at Section 5 of the Assessment;
 - o A full assessment (see p.8) of the feasibility of the compatibility of a green roof with the PV installation has concluded that the two are not compatible:
 - This is predominantly for structural reasons; where architecturally great effort has been made to minimise extraneous features at roof level given the prominence of the site, to adequately secure both PVs and a green roof against roof loads would require significant ballasting and additional elements such as a larger and more prominent parapet;
 - Such a parapet will therefore not be appropriate here and as such it is not feasible to provide a green roof to this development. Alongside the potential to provide some planter boxes on a lower roof level, the development will continue to provide a blue roof in accordance with details secured by Condition 16.

- In regard to active cooling function, the Assessment confirms that the selected mechanical equipment functions for heating purposes only. This means that no active cooling function is provided and through such non-provision cooling functions are permanently removed.
- With regards to Condition 29:
 - Full details of the proposed array of solar PV panels including output, efficiency, metering and maintenance are provided at Section 4 of the Assessment;
 - Technical specifications for the heat pumps are also provided.

Read together, the submitted Assessment from Peter Deer and Associates addresses all matters under conditions 27, 28 and 29.

I trust that everything is in order. If any further information is required, please do not hesitate to contact me using the details set out at the head of this letter.

Yours faithfully

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

Nigel Dexter
Associate