

24 April 2020



Regeneration and Planning  
Culture and Environment  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Nigel Dexter  
E: [ndexter@savills.com](mailto:ndexter@savills.com)  
DL: +44 (0) 20 7420 6374  
F: +44 (0) 20 7016 3769

33 Margaret Street  
London W1G 0JD  
T: +44 (0) 20 7499 8644  
[savills.com](http://savills.com)

Dear Sir/Madam

**369-377 Kentish Town Road, NW5 2TJ**

**Application to Discharge Conditions 16 (Sustainable Urban Drainage, Part A Only), 30 (Rainwater Harvesting or Greywater Recycling) and 32 (Revised Air Quality Risk Assessment) 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 16 (Part A), 30 and 32.**

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;
- A Flood Risk Assessment and Surface Water Drainage Strategy Report, prepared by Price & Myers; and
- A Low Emissions Strategy Note, prepared by XCO2.

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

## Content of Submission

### Condition 16 states

*A) Prior to commencement of development, full details of the sustainable drainage system including blue roof providing 20m3 attenuation, shall be submitted to and approved in writing by the local planning authority. This shall include the following:*

- i. an updated FRA and SuDS proforma to reflect latest drainage design proposals, as per sketch 26778/SK600;*
- ii. volumes of proposed attenuation on the drainage sketch and advice from a blue roof specialist that the site can be drained effectively as proposed;*
- iii. evidence to demonstrate that the drainage system would operate effectively and that a hydrobrake can be properly incorporated to discharge the site runoff and still provide positive drainage to the public sewer network via the existing sewer network; this should provide realistic design cover and invert levels that, at least, reflect the existing site and drainage levels.*

*Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and shall demonstrate a runoff as close to greenfield as feasible with a minimum 50% reduction in run off rate. Details shall include a lifetime maintenance plan, and shall thereafter be retained and maintained in accordance with the approved details.*

*B) Prior to occupation of the development, evidence that the sustainable drainage system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.*

This submission seeks discharge of Part A) of this condition only, to address pre-commencement requirements. Details of Part B) will be discharged at a later date once the approved system has been installed.

The Flood Risk Assessment and Surface Water Drainage Strategy Report now submitted has been updated to address the specific requirements of this condition and as an update to the previous assessment that formed a part of the previously approved documentation.

As noted, the volume of the blue roof system differs from that suggested within the condition but is supplemented by an additional attenuation tank within the permeable paving area; this approach reflects the drainage strategy agreed with the Lead Local Flood Authority during the assessment of this application. This volume together ensures sufficient attenuation capacity is provided.

### Condition 30 states

*Prior to discharge of the s106 Sustainability Plan, a feasibility assessment for rainwater harvesting or greywater recycling shall be submitted to the local planning authority and approved in writing.*

*If considered feasible, details of the rainwater harvesting or greywater recycling shall be submitted to the local planning authority and approved in writing, prior to discharge of the s106 Sustainability Plan. The development shall thereafter be constructed in accordance with the approved details.*

As noted within the Flood Risk Assessment and Surface Water Drainage Strategy Report (Section 4), it is not possible to rely upon such systems to provide for attenuation given that if the water is not being used and the tank remains full then no capacity can be provided during a storm event.

As such, it is not proposed to install such a system given the wider attenuation capacity being used.

Condition 32 states

*No development shall take place until an updated Air Quality Risk Assessment in relation to construction has been submitted to and approved by the Local Planning Authority in writing. The risk assessment shall be in accordance with IAQM Guidance and the Mayor's Sustainable Design and Construction SPG.*

*The risk assessment shall include reference to the IAQM criteria and justification for the selections made.*

The updated Air Quality Risk Assessment, completed in accordance with the guidance noted above, confirms that subject to normal mitigation methods the construction phase will have a negligible effect upon local air quality.

All methods for the construction phase will be subject to further sign-off prior to works commencing via a Construction Management Plan that is secured via S106 legal obligation.

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 dark ink, appearing to read "Savills" in a stylized, cursive script.

Nigel Dexter  
Associate