

**Statement of Common Ground
between the London Borough of
Camden and the
Environment Agency
concerning the Camden Local
Plan Proposed Submission Draft**

4th December 2025

1. Introduction

- 1.1 This document is a Statement of Common Ground between the London Borough of Camden and the Environment Agency, and concerns planning policies included in the Camden Local Plan Proposed Submission Draft at the Regulation 19 stage.
- 1.2 It has been prepared to demonstrate that Camden's Local Plan Proposed Submission Draft is 'based on effective joint working on cross boundary strategic matters' throughout the plan preparation period in accordance with Paragraph 36 of the National Planning Framework (NPPF) and will inform further engagement to ensure effective implementation of Local Plan policies.
- 1.3 It focusses on the matters raised by the Environment Agency in their response to consultation on the Camden Local Plan Proposed Submission Draft. It highlights matters where agreement has been reached between the London Borough of Camden and the Environment Agency, and areas where agreement has not yet been reached.
- 1.4 In the spirit of collaboration, the document has been prepared as a 'live' document, which can be updated as matters progress and agreement is reached on outstanding issues. It therefore includes details on mechanisms for monitoring, reviewing and updating the Statement of Common Ground.
- 1.5 The London Borough of Camden is reviewing its Local Plan to ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics. The Council published the Camden Local Plan Proposed Submission Draft for comment in May - June 2025. The draft Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this.
- 1.6 The Environment Agency provided a response to the Camden Local Plan Proposed Submission Draft on 27 June 2025.

2. Strategic Geography

- 2.1 The parties to this SoCG are the London Borough of Camden and the Environment Agency.

London Borough of Camden

- 2.2 Camden is a diverse inner London Borough with a population of approximately 215,000. Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. The southern portion forms part of the Central Activities Zone (CAZ) and includes Bloomsbury and Holborn, which neighbour the West End and City of London. Further north the character

changes with many residential areas and neighbourhoods, including Camden Town, Hampstead, Highgate, Swiss Cottage, West Hampstead and Kentish Town, each with their own distinctive identity and characteristics. The character of the borough is also shaped by its topography and by significant parks and open spaces including Hampstead Heath and Primrose Hill.

2.3 Camden is in Flood Zone 1, with no main rivers or coast. The London Borough of Camden is also a Lead Local Flood Authority, responsible for managing the risk of flooding from surface water, groundwater and ordinary watercourses and leading on community recovery. The Council has also prepared a [Flood Risk Management Strategy](#) for the borough.

2.4 London Borough of Camden is bordered by six other London boroughs: City of London, Westminster City Council, London Borough Brent, London Borough Barnet, London Borough Haringey and London Borough Islington.



Environment Agency

2.5 The Environment Agency (EA) is a government body, established in 1996 to protect and improve the environment. The EA is responsible for:

- regulating major industry and waste;
- treatment of contaminated land;
- water quality and resources;
- fisheries;

- inland river, estuary and harbour navigations;
- conservation and ecology; and
- managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.

3. Key Strategic Matters

- 3.1 Many of the strategic matters and key issues to be addressed through compliance with the duty to co-operate are, in London, a matter for the London Plan or addressed through the preparation of the London Plan. The London Plan is part of the development plan for all planning authorities in London and Local Plans prepared by London boroughs are required to be in general conformity with it.
- 3.2 In London, planning and co-operation on strategic matters concerning the environment are generally covered by the London Plan, with more locally specific matters covered in local plans. The Environment Agency are a key stakeholder on the London Plan and Camden and other boroughs also engage on the preparation of the Plan. Given this, and as Camden is in Flood Zone 1 with no rivers or coastline, it is considered that there are no strategic environmental matters to be addressed in the context of the Camden Local Plan Proposed Submission Draft that are relevant to the Duty to Co-operate.
- 3.3 The London Borough Camden has engaged with the Environment Agency throughout the preparation of the Local Plan, including on the preparation of the Sustainability Appraisal and Habitats Regulation Assessment, providing an opportunity for strategic environmental matters to be discussed. The Environment Agency have not raised any concerns in relation to the Local Plan (see Appendix 1) and consider the Plan to be sound.
- 3.4 There are no strategic matters in relation to the Camden Local Plan Proposed Submission Draft upon which the Environment Agency have any concerns. Camden have engaged with the Environment Agency in an appropriate, proportionate and effective manner throughout the preparation of the Local Plan and the Environment Agency are satisfied that the Duty to Co-operate has been met. It is therefore appropriate for this SoCG to focus on areas of agreement and disagreement between Camden and the Environment Agency in respect of the matters raised by the EA in their response to the consultation on the Plan, which are non-strategic in nature.

4. Matters where the parties agree or disagree

- 4.1 The table below sets out the matters raised by the Environment Agency in their representation on the Camden Local Plan Proposed Submission Draft (Regulation 19), and the status of those representations.
- 4.2 The table seeks to provide clarification and clarity to the extent to which matters raised by the Environment Agency are resolved or remain unresolved.

The table therefore represents the current agreed position in respect of the agreements and differences between London Borough of Camden and the Environment Agency.

Relevant section of the Camden Local Plan Proposed Submission Draft	EA comment on the Camden Local Plan Proposed Submission Draft	Camden Response	Common Ground Agreed?
Whole Plan	<p>Thank you for consulting us on the above proposed submission draft for the new Camden Local Plan. Having reviewed the submitted information, we have the following comments to make on environmental considerations within our statutory remit. The comments are divided into:</p> <ul style="list-style-type: none"> • Local plan policies and content • Evidence base • Site allocations <p>We believe that the draft local plan is sound in terms of environmental considerations within our remit.</p>	Comment noted.	Agree
Policy CC1 Responding to the climate emergency	We welcome the additional policy clauses around retrofitting to support better energy efficiency of existing buildings.	Support noted.	Agree
Policy CC3 Circular economy and reduction of waste	We are pleased to see the inclusion of clause B (4) around on-site sorting and re-use of materials. We also welcome the inclusion of Figure 19 that outlines the waste hierarchy established in the North London Waste Plan.	Support noted.	Agree

Policy CC3 Circular economy and reduction of waste	As recommended in our Regulation 18 response, we believe that all development (not just major development) should demonstrate the facilitation of the movement of waste up the hierarchy.	Policy CC3 (Circular economy) seeks to ensure all development minimises waste through the application of the waste hierarchy; this is not limited to major development.	Agree
Policy CC6 Energy use and the generation of renewable energy	In the supporting text for this policy, we would recommend that a paragraph be added acknowledging that increased water efficiency can reduce requirements.	There are a number of interventions that can reduce energy use. It is considered that this detail is best included in supplementary guidance, rather than the Local Plan.	Agree
Policy CC8 Overheating and cooling	We support this policy and recommend that reference is made to The London Climate Resilience Review 2024, which identifies heat risk as one of the principal climate risks for London.	Propose the following modification to paragraph 8.105 - "The UK's climate is changing and in the coming decades periods of high temperature will become more common and more intense. <u>The London Climate Resilience Review (2024), commissioned by the Mayor of London, provides an assessment of London's climate resilience and identifies heat risk as one of the principal climate risks for London.</u> Recent heatwaves have...".	Agree

Policy CC9 Water efficiency	While we trust that this policy is sound and welcome the requirement for residential development to achieve a water efficiency of 110 litres of water per head per day; we would request the council to consider recommendations from our Regulation 18 response (dated: 13 March 2024), which we believe can make the policy more robust and effective.	Without further evidence to justify the feasibility of higher levels of water efficiency the Local Plan is not able to include 85 litres per person per day as a requirement at this time.	Agree
Policy CC10 Flood risk	We are supportive of this policy and have no further comments since our Regulation 18 response.	Support welcomed.	Agree
Policy CC11 Sustainable drainage	We welcome the amended policy wording under clause C of this policy. We are pleased to see the inclusion of SuDS guidance in paragraph 8.157 and would like to re-share the following resources that can be extremely beneficial while designing efficient SuDS: <ul style="list-style-type: none"> • The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13 • The CIRIA C753 SuDS Manual 	Further guidance and links will be provided with the Council's Camden Planning Guidance supplementary planning document.	Agree
Policy NE1 The natural environment	We have no further comments to add to this policy.	Comment noted.	Agree

Policy NE2 Biodiversity	We are supportive of this policy and request the council to consider recommendations shared in our Regulation 18 response (dated: 13 March 2024).	<p>We have referenced the Local Plan policy on Sustainable Drainage in the introduction to Policy NE2 (at paragraph 11.30).</p> <p>Also, we have acknowledged the relevance of the London Plan's 'Urban Greening Factors' in delivering biodiversity gains in the supporting text to NE2 (paragraph 11.45).</p> <p>In paragraphs 11.44 to 11.46, we have outlined how Biodiversity Net Gain operates and highlighted the particular importance of the Regent's Canal as a major water body. The Council is intending to prepare further detailed guidance to assist applicants in complying with BNG legislation. It is not considered necessary to include this detail as part of the Local Plan.</p>	Agree
Policy NE4 Water quality	We are pleased to see the inclusion of the Thames River Basin Management Plan and the Water Framework Directive in the supporting text for this policy.	Support welcomed.	Agree

Policy T1 Safe, healthy and sustainable transport	We welcome the inclusion of wording around SuDS in clause 3 of the policy.	Support welcomed.	Agree
Evidence Base	We have no further comments to add in relation to the evidence base submitted as part of the draft local plan since our Regulation 18 response (dated: 13 March 2024).	Comments noted.	Agree
Site Allocations	Please refer to our Regulation 18 response (dated: 13 March 2024) for extensive comments on site allocations in terms of environmental constraints within our remit. These were attached as Appendix one to the said response.	The previous comments were considered in the preparation of the Submission Draft Local Plan and text amended included as considered necessary.	Agree

5. Governance arrangements

- 5.1 This Statement has been prepared as a 'living' document, which will be reviewed and updated:
- whenever agreement is reached on any outstanding matters; or
 - at key stages in the plan-making process, as the Plan progresses through examination.

Signatures

Signed on behalf of London Borough of Camden

R. Burden

Rebecca Burden

Development Plans Manager – London Borough Camden

4 December 2025

Signed on behalf of the Environment Agency

Bronte Giles

Bronte Giles

Planning Specialist, Environment Agency

4 December 2025

Appendix 1 – Correspondence with the Environment Agency

Ms Nicola Tulley
London Borough of Camden
Forward Planning & Projects
Town Hall Extension Argyle Street
London
WC1H 8EQ

Our ref: 102642

Date: 11 January 2019

Dear Nicola

SA/SEA Scoping Report

Thank you for consulting us on the site allocation SA scoping report. We received this consultation on the 06 December 2018. Please see our comments on the next page structured in question/answer format.

If you have any questions please contact me on [REDACTED] or email me at HNL SustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely

Demistry Lyons
Sustainable Places Planning Advisor

Cont/d..

1) Is the approach taken, in using the format of the 2017 Local Plan SA Scoping report as a basis for the Site Allocations SA Scoping Report considered to be appropriate?

The Local Plan, together with its supporting documents, are appropriate for this study.

2) Is the document clearly structured and does it cover the main issues in an understandable way?

Flood risk: The London Borough of Camden does not have any areas modelled at risk of tidal or fluvial flooding as correctly identified within the scoping report. Surface water flooding has been covered by the scoping report however there is no mention of groundwater flooding. Paragraph 8.60 of your local plan reads “Camden also has a small risk of groundwater flooding”. Therefore we advise that you consult your Lead Local Flood Authority (LLFA) concerning this matter.

Contamination: The scoping report has correctly identified Source Protection Zones (SPZs) 1 and 2 being located in the London Borough of Camden. *We are also pleased to see that the scoping report includes a definition of a SPZ.* However we feel that this definition could be expanded to give members of the public a better understanding of the risks posed to the water environment and human health. Please see below for suggestion.

SPZ's have been produced to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. It is for this reason that certain development types may be deemed unacceptable where they pose a risk of contamination to groundwater. High polluting activities, such as petrol stations or cemeteries should be directed away from SPZ1.

Further guidance can be found on our website at

<https://www.gov.uk/government/publications/groundwater-source-protection-zones>

In addition, we ask to be consulted on potentially contaminative development in a SPZ. We also ask to be consulted on land where a previous land use may have caused contamination. You may wish to overlay your allocated sites onto a map of SPZs in order to determine whether any sites are affected and if any further action is required.

On any site where contamination is known or suspected, the applicant will need to demonstrate how the proposed development both during construction and after the construction phase will not negatively affect water quality in surface water or groundwater bodies. Applicants should follow the published [groundwater protection position statements](#) and submit any required reports.

Finally, we recommend that applicants follow the risk management framework provided in ‘Model procedures for the management of land contamination ([CLR11](#))’, when dealing with land affected by contamination.

3) Is the review at Tables 2 and 3 and Appendix 1 of other plans, programmes and sustainability objectives sufficient for the purposes of this document? Are there any other relevant plans, programmes and sustainability objectives that should be taken into account?

When discussing the water quality of The Grand Union and Regents Canals in the Water Quality and Environmental Impact section of the scoping report, we recommend

that the requirements of the Water Framework Directive and Thames River Basin Management Plan are referenced.

4) Do you consider that the range of baseline information at Appendix 2 is appropriate and/or are there any further baseline indicators that might provide useful information and where might they be sourced?

We are pleased to see that the scoping report highlights the fact that the borough is within Thames Water's London Water Resource Zone.

Reference has been made to the Strategic Food Risk Assessment (SFRA) 2014 which according to our records is the most up to date SFRA.

Please see comments concerning groundwater flooding under question 2.

5) Do you consider that the main sustainability issues have been satisfactorily identified from the baseline information?

The number of sites of potential land contamination paragraph in appendix 2 covers remediation and says that the Local Plan is to highlight potential contamination issues and need for assessment and remediation. However we cannot see the any guidance in the local plan surrounding remediation requirements for land located in a SPZ.

6) No question 6

7) Do you consider that these proposed SA objectives are sufficient and adequately reflect the key sustainability issues?

We recommend that further detail be given concerning the management of groundwater resources.

8) Do you have any other data, comments or suggestions that you think may be useful to inform the Sustainability Appraisal?

We have no further suggestions.

London Borough of Camden
Forward Planning & Projects
Town Hall Extension Argyle Street
London
WC1H 8EQ

Our ref: 102642/SL-04/PO1-L01

Date: 21 January 2022

Dear Sir/Madam

Site Allocations

Thank you for consulting us on the emerging Site Allocations Local Plan. We have no objection in principle to the redevelopment of the areas proposed in the submitted document.

Flood Risk

We have assessed all of the submitted sites and are satisfied that there is no risk from flooding arising from rivers that fall within our remit. Some of the site allocations however are located in areas of high risk of flooding from surface water. Sustainable drainage systems should be incorporated into any redevelopment plans for these site allocations to address this in line with your Local Plan Policy CC3 Water and flooding. Addressing surface water flood risk will improve the appeal of the area and its regeneration.

Groundwater

While our records show that there are areas designated as Source Protection Zones (SPZ) 1 and 2 in the borough of Camden which centre on Primrose Hill Park, we are pleased to see that no site allocations are designated here.

However, it is still important that any development within a SPZ does not have a detrimental impact on the quality of controlled waters, including groundwater. We therefore recommend that a strong policy is included within any updates to your Local Plan to protect groundwater against contamination.

Any development in areas where contamination is known or suspected, should follow the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency Groundwater protection guides on [gov.uk](https://www.gov.uk).

Water Resources

You should ensure that all new developments incorporate water efficiency measures. All new residential development are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within [the Building Regulations &c. \(Amendment\) Regulations 2015](#).

However, we recommend that in areas of serious water stress (as identified in our report [Water stressed areas - final classification](#)) a higher standard of a maximum of 110 litres per person per day is applied. The London Plan, Policy SI 5, sets its requirements for efficiency of water use for residential uses at 105 L/h/d, and

Cont/d..

commercial uses at the BREEAM 'excellent' standards for the 'Wat 01' water category. All new non-residential development of 1000sqm gross floor area or more should meet this.

Final Comments

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

George Lloyd
Planning Advisor


E-mail: HNLsustainablePlaces@environment-agency.gov.uk

Strategic Planning & Implementation Team
Camden Council
Town Hall
Judd Street
London
WC1H 8ND

Date: 13 January 2023

Email: planningpolicy@camden.gov.uk

ISSUES AND OPTIONS (REG 15) FOR CAMDEN LOCAL PLAN REVIEW

Thank you for consulting us on the Camden Local Plan Review - Issues and Options, Regulation 15 consultation.

We support the ambition to update Camden's Local Plan to ensure continued compliance with the London Plan (2021) and the National Planning Policy Framework (NPPF) and supporting Planning Policy Guidance (PPG).

We have reviewed the information provided on the Camden Local Plan Review interactive website and have the following comments to make on environmental considerations within our remit. Our response is structured in reference to the relevant sections of the topic pages online and includes our answers to the proposed questions.

PART 1 – Climate Change and Sustainability

Question 1: What should our future Local Plan policies on climate change and sustainability cover?

The Local Plan review presents an opportunity to strengthen planning policy on mitigating and adapting to climate change, and to ensure a fair transition to a low carbon economy.

In reference to the Climate Change section of the Planning Practice Guidance (PPG) and in line with the objectives of the Climate Change Act 2008, Local Plan policies should tackle climate change and its impacts. Within our remit, we are specifically concerned with significant climate impacts such as flood and coastal risks, water supply and management, biodiversity, and industrial regulation.

Flood risk

We would be looking to see the incorporation of water management and resilience within the updated policies, as well as strong encouragement for natural flood risk management solutions.

Policy should be updated and enhanced to reflect the changes to national climate change policy. The peak river flow climate change allowances were updated in May 2022 and should be reflected within the updated policy, if applicable.

All developments in Flood Zones 2 and 3 should assess and design to the central allowance for climate change, excluding essential infrastructure which should be

Cont/d..

designed for the higher central allowance. The most up-to-date climate change allowances should be used within the updated Local Plan and Strategic Flood Risk Assessment (SFRA). Further details are available at:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Nature-based solutions (NbS)

We strongly encourage that the Local Plan promotes the uptake of Nature-based solutions (NbS) to build resilience to climate impacts, such as flooding, drought and overheating, and to absorb and store greater quantities of carbon. This also supports commitments to achieving net zero carbon as NbS can provide natural carbon sinks and sequester carbon. We recommend the use of a Natural Capital approach to prioritise the use of NbS within the Plan. Biodiversity Net Gain targets can also be linked to policies designed to create resilient places.

Groundwater quality

We have reviewed section 8 of the adopted Local Plan and have the following comments regarding groundwater quality.

We are pleased to see that Source Protection Zones and the associated risk of development in these areas have been identified in Section 8.56.

British Geological Surveying (BGS) mapping indicates that there are Superficial Deposits of Lynch Hill Gravels and Hackney Gravels to the south of the borough. Claygate Member and Bagshot Formation Bedrock aquifers are also present to the north of the borough. These aquifer units are classed as Secondary A aquifers, defined as permeable strata capable of supporting water supplies at a local rather than strategic scale and in some cases forming an important source of base flow to rivers. As such, groundwater is sensitive in these areas and the quality and quantity of groundwater should be protected and enhanced through any future development works.

The Environment Agency's Approach to Groundwater Protection should be consulted for development constraints at sites atop Secondary A aquifers, as well as development types that we would object to in principle (i.e. petrol filling stations and non-inert landfills within Source Protection Zone 1 (SPZ1).

Brownfield sites, especially those with industrial former uses, may be affected by land contamination. We note that the requirements for remediation of land affected by contamination have not been included. The following should be considered within the updated policies with respect to land quality issues:

- Specific National Planning Policy Framework (NPPF) paragraphs 174 and 183 should be considered
- Relevant guidance such the Environment Agency's [Approach to Groundwater Protection and Land Contamination Risk Management \(LCRM\)](#) should be promoted
- Policies should require developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated.
- Policies should require developers to ensure sites are suitable or made suitable for intended use.
- Policies should require developers to prevent discharges to ground through land affected by contamination.

For sites where piled foundation works are proposed in a Source Protection Zone or

should piled foundations extend through the London Clay to more sensitive aquifers, then a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised. We recommend this is incorporated into policy.

With regards to section 8.57 of the adopted Local Plan, we recommend the review of section G11 of the [Approach to Groundwater Protection](#) which states that:

“Discharges of surface water run-off to ground at sites affected by land contamination, or from sites used for the storage of potential pollutants are likely to require an environmental permit. This applies especially to sites where storage, handling or use of hazardous substances occurs (for example, garage forecourts, coach and lorry parks/turning areas and metal recycling/vehicle dismantling facilities). These sites will need to be subject to risk assessment with acceptable effluent treatment provided.”

Question 2: How can the Local Plan minimise carbon emissions, promote a circular economy, encourage the retrofit of buildings and maximise the use of renewable energy?

We recommend a requirement for all major development applications to be accompanied by carbon statements, which include the quantification of carbon costs during construction and the lifetime of the development, as well as the re-use of appropriate materials on site and during construction.

Policy should ensure there will be adequate provision of space for waste separation and collection on development sites. Additionally, we would strongly recommend the development of evidence to support infrastructure funding contributions towards retrofitting energy and water efficiency measures to existing housing stock. We would also expect to see requirements for development to incorporate energy efficiency measures, including provision for electric vehicle charging points.

We strongly encourage the provision of green space within development, for example, the inclusion of green roofs and increased tree coverage. We also support the utilisation of tools in which to inspect development to ensure green space is provided.

Water efficiency

Under the Building Regulations (2015), all new residential development is required to achieve a water consumption limit of a maximum of 125 litres per person per day. Since Camden is located in an area of serious water stress (as identified in our report [Water stressed areas - final classification](#)), we recommend a higher standard of a maximum of 110 litres per person per day is applied. Additionally, we recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM ‘excellent’ standards for water consumption.

Waste management

We encourage the alignment of policies within Waste & Mineral Plans, and Local Plans, to promote approaches that support the transition to a more Circular Economy and the Waste Hierarchy. This can be achieved through the promotion of waste reduction, reuse and recycling in an integrated way.

In considering these aspects, the Plan should work towards reductions in energy use and conservation of resources. Furthermore, we suggest the CCC’s Sixth Carbon budget ([Waste Sector Summary](#)) statements are referenced and recommend the consideration of the practicalities for Carbon Capture and Storage in relation to Energy

from Waste (EfW).

Question 3: How can the Local Plan reduce surface water flooding, improve air quality and address overheating?

Air quality

We recommend the Local Plan commits to and considers how to deliver an air quality neutral and air quality positive approach, in line with London Plan Policy SI1 Improving Air Quality. Policy should support the delivery of measures identified in the draft new Camden Clean Air Action Plan.

We encourage consideration is also given to how an air quality approach can be linked to other policies within the Plan, such as improvement and provision of green infrastructure.

Surface water management

We recommend policy includes a requirement for development to implement measures in the borough's Surface Water Management Plan (SWMP). We expect SWMPs are as up to date as possible, including updating mapping and modelling following the July 2021 flooding and recent sewer flooding in December 2022, to ensure that vulnerable surface water flood risk locations are included in plans and maps for use by developers. We would also be looking to see that the surface water runoff volumes for a 6-hour rainfall event are refined, if required, due to changes since the Local Plan was originally published.

Wastewater provisions

Consideration should be given to provisions for wastewater early on in the plan preparation process. We encourage the enhancement of wastewater management on new developments to reduce the impact on the surface water network. We also suggest incorporating Thames Water updates around locations that are vulnerable to sewer flooding to identify these areas as not being suitable for development.

The Local Plan should be supported by a localised evidence base relating to water resources and quality, with reference to water company drainage and wastewater management plans. The Environment Act (2021) has made the provision of drainage and wastewater management plans statutory. These plans should account for climate change and ensure drainage infrastructure can cope with increase intensity of storms.

Supporting evidence-base

Climate change

To build resilience and account for a changing climate, the Local Plan should be prepared using the latest evidence to identify climate risks, both now and in the future. It is essential to tackle these risks early and so we recommend the Plan is informed by a strong evidence base, informed by the following sources:

- [UK Climate Change Risk Assessment 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/103122/uk-cca2022-report.pdf).
- [Independent Assessment of UK Climate Risk - Climate Change Committee \(theccc.org.uk\)](https://theccc.org.uk/)
- [UK Climate Projections \(UKCP\) - Met Office](https://www.metoffice.gov.uk/research/ukcp)

The Environment Agency's report [Living better with a changing climate](https://www.environment-agency.gov.uk/research/living-better-with-a-changing-climate), sets out the evidence on observed changes and expected future climate impacts relating to water management (both too little and too much water).

Flood risk

The Strategic Flood Risk Assessment (SFRA) is a crucial document for understanding the impacts of climate change on all sources of flood risk over the anticipated lifetime of development proposed within the Local Plan. Camden's SFRA should be informed by our [Climate Change Allowances](#), which have been updated to reflect the UK Climate Projections (UKCP18).

Water resources and water quality

The updated Local Plan should be supported by a Water Cycle Study to inform water resources and water quality policies, as well as the Infrastructure Delivery Plan (IDP).

We have identified Camden to be located in an [area of serious water stress](#) and therefore recommend policy includes tighter water efficiency requirements for all new development, which will potentially enable more growth with the same water resources.

We also recommend attention is given the [Water company drainage and wastewater management plans](#), which account for climate change, ensuring drainage infrastructure can cope with increased intensity of storms. The Environment Act (2021) made these plans statutory and collaborative, and they should be integrated into long term planning documents.

PART 2 - Natural Environment

For this chapter, we have combined our answers to the questions online under the following three topics: green infrastructure, biodiversity and Sustainable Drainage Systems (SuDS).

Green Infrastructure

Policy G1 of the London Plan states that *'Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.'* We strongly recommend maximising opportunities to integrate connected green and blue infrastructure along transport corridors. Established policies regarding transport infrastructure being located away from areas of high flood risk, or where road drainage may impact on water resources/quality issues, should be reinforced. Furthermore, site selection for new infrastructure should account for future climate change.

Biodiversity

In accordance with the Environment Act (2021), Local Plan Policy A3 should be strengthened by referring to the delivery of a minimum 10% biodiversity net gain, which becomes mandated in November 2023. London plan Policy G6 states that *'Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.'*

Local plans should set out Biodiversity Net Gain (BNG) policy requirements, including those that help tackle climate change, such as Nature-based solutions (NbS). BNG offers considerable scope to help create resilience places, through maximising opportunities to improve the water environment, manage flood risk and addressing climate risks.

Sustainable drainage

Along with the promotion for sustainable green growth and infrastructure, we strongly encourage the incorporation of multi-beneficial Sustainable Drainage Systems (SuDs). Policy SI 13 of the London Plan states that *'Drainage should be designed and implemented in ways that promote multiple benefits including increased water use*

efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation. Such approaches also help to minimise the carbon footprint associated with wastewater treatment and water supply, and provide adaptation benefits of reducing flood risk, ameliorate high temperatures and replenish water resources.

PART 3 – Sharing the benefits of new development

We have the following comments in response to question 2 regarding future local plan policies on delivering new development cover.

With regards to groundwater and land quality issues, we recommend paragraphs 174 and 183 of the National Planning Policy Framework (NPPF) are considered and incorporated into local policy. Relevant guidance such as the Environment Agency's [Approach to Groundwater Protection](#) and [Land Contamination Risk Management \(LCRM\)](#) should also be promoted in the Local Plan.

Policies should be strengthened to requiring developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated, as well as ensuring that sites are suitable or made suitable for their intended use. We would strongly recommend that policies require developers to prevent discharges to the ground through land affected by contamination.

The Environment Agency's [Approach to Groundwater Protection](#) should be consulted for development constraints at sites atop Secondary A aquifers, as well as development types that we would object to in principle (i.e. petrol filling stations and non-inert landfills within SPZ1).

Whilst we do not usually comment on sites within Flood Zone 1, a Flood Risk Assessment may be required for some of the developments brought forward. Therefore, the following guidance should be adhered to: [Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK \(www.gov.uk\)](#).

Lastly, regarding question 3 on the capturing and sharing the benefits of new development across Camden, we suggest a requirement for an assessment from developers in order to balance commercial and residential need to enhance the Community Investment Programme (CIP) initiative outlined in Growth and Spatial Strategy section (paragraph 2.55) of the adopted Local Plan (2017).

Final comments

Thank you again for seeking our representation on the Issues and Options Regulation 15 consultation for the Camden Local Plan Review. We trust our comments are helpful and clear and will be taken into consideration during the review of existing policy.

We welcome the opportunity for continued engagement throughout the Local Plan (update) preparation process.

Should you have any questions or require further information regarding any of the points raised in this response, please contact me.

Yours sincerely,

Rosie Brown

Sustainable Places Planning Advisor

E-mail: HNLsustainablePlaces@environment-agency.gov.uk

Regeneration and Planning
London Borough of Camden
Town Hall Extension
5 Pancras Square
London
N1C 4AG

Date: 28 April 2023

Email: planningpolicy@camden.gov.uk

Camden Sustainability Appraisal Scoping Report

Thank you for consulting us on the Camden Sustainability Appraisal (SA) Scoping Report on the 3 March 2023.

We have reviewed the SA Scoping Report, Appendix 1 (Plans and Programmes) and Appendix 2 (Baseline Indicators) in consideration of environmental constraints and potential significant environmental effects that are likely to result from the Local Plan (including Site Allocation).

Our response is structured in reference to the questions asked as part of the SA Scoping Report consultation email.

1. Is the document clearly structured and does it cover the main issues in an understandable way?

We find the document to be clearly structured and easy to navigate.

2. Is the review at Tables 2 and 3 and Appendix 1 of other plans, programmes and sustainability objectives sufficient for the purposes of this document? Are there any other relevant plans, programmes and sustainability objectives that should be taken into account?

We are pleased to see the inclusion of a wide range of plans, programmes, and sustainability issues in Tables 2 and 3 and Appendix 1.

For documents relating to Air Quality, we note Air Quality Neutral is mentioned as a Key Objective under Ref No. 89 (The Mayor's Sustainable Design and Construction: SPG 2014) of Appendix 1. In addition, we recommend reviewing and including the recently published London Planning Guidance on [Air Quality Positive \(AQP\) Guidance](#).

We also recommend including Natural England's newly published [Green Infrastructure Framework - Principles and Standards for England](#) for advice on how Green Infrastructure can be used to support and enhance communities.

3. Do you consider that the range of baseline information is appropriate and/or are there any further baseline indicators that might provide useful information and where might they be sourced?

We are pleased to see a wide range of baseline indicators have been included within Appendix 2.

We note there is no indicator for soil and groundwater quality. Due to the presence of Source Protection Zones (SPZ) within the borough, we recommend incorporating this within the Appendix.

We recommend Appendix 2: Baseline Indictors is amended to incorporate the following additional indicators:

Natural environment and open space

- Achievement of biodiversity action plan objectives and targets
- Area of land actively managed for nature conservation

Water and Flooding

- Number of new abstractions required
- Number of water efficient developments
- Use of water saving technology
- Change in water abstraction

Climate Factors

- Reduction in emission of all greenhouse gases and not just carbon dioxide

Recycling and Waste Management

- Volume of waste produced that needs to be disposed of in a landfill
- Number of waste recycling facilities

Groundwater and Contaminated Land

- Area of contaminated land
- Reduction in soil-related pollution incidents and flooding

Health and Wellbeing

- The increase/decrease in number of people living close to green or open spaces

4. Do you consider that the main sustainability issues have been satisfactorily identified from the baseline information?

We have the following comments to make regarding improvements of the baseline information for the main sustainability issues for Camden.

Water Quality

We are pleased to see that SPZ's are discussed here. See the EA's [Approach to Groundwater Protection](#) for where we would object in principle to certain types of development within an SPZ1.

Potential contamination on previously developed land

We recommend that an amendment is made to make specific reference to National Planning Policy Framework (NPPF) paragraphs 174 and 183, which mandate that policies should contribute and enhance the natural and local environment and take full account of ground conditions and potential risks from contamination.

Additionally, the Environment Agency's [Approach to Groundwater Protection](#) and [Land Contamination Risk Management \(LCRM\)](#) should be promoted.

Policies should require developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated. Policies should also require developers to ensure sites are suitable or made suitable for intended use. Furthermore, policies should require developers to prevent discharges to ground through land affected by contamination.

Water quality and environmental impact

The Upper Chalk aquifer should be taken in full consideration where developments where deep piled foundations are proposed. Should foundations works penetrate through the London Clay to the Chalk then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised.

Air Quality

We welcome the inclusion of Air Quality within the Scoping Report and support the acknowledged need to improve air quality standards across the borough. We actively encourage actions to improve air quality and pleased to see the Camden Clean Air Action Plan 2023 – 2026 referenced in the Scoping Report.

We recommend the borough commits to and considers how to deliver an air quality neutral and air quality positive approach, in line with London Plan Policy SI1 Improving Air Quality. We encourage consideration is also given to how an air quality approach can be linked to other policies within the Plan, such as improvement and provision of green infrastructure.

We support the ambitions of the Clean Air Strategy (2019). Policies requiring the use of efficient, low emission and up-to-date plan for non-regulated units (and enforcement of Local Authority-regulated industry) will support both improved air quality and reduced greenhouse gas (GHG) emissions.

Biodiversity and Green Spaces

We are pleased to see the Scoping Report references Camden's Biodiversity Strategy and we look forward to reviewing the Camden Nature Recovery Network and new Biodiversity Action Plan.

5. Do you consider that these proposed SA objectives are sufficient and adequately reflect the key sustainability issues?

Please find our comments relating to the Environmental Objectives of the Scoping Report below.

**5. To Conserve and improve open space provision &
6. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible**

We recommend the strengthening of objectives regarding transport infrastructure being located away from areas of high flood risk, or where road drainage may impact on water resources/quality issues. In addition, site selection for new infrastructure should account for future climate change.

In order to achieve resilient functioning ecosystems and allow our wildlife to adapt to climate change, sufficient habitat cover needs to be present within the borough. The key issues that we would like to be considered as fundamentals of creating resilient functioning ecosystems are around habitat connectivity and ensuring wild refuge areas are maintained. We also recommend new re-naturalised areas are created, particularly in the boroughs green spaces. It would be advisable to set a target for the percentage of wild cover within green spaces to help prevent further biodiversity decline.

In line with the commitment made in the Government's 25 Year Environment Plan, Natural England have recently published new guidance known as the Green Infrastructure Framework ([Green Infrastructure Home \(naturalengland.org.uk\)](https://www.naturalengland.org.uk)). This includes a *Green Infrastructure Planning and Design Guide* which provides evidence-based practical guidance on how to plan and design good green infrastructure. It complements the National Model Design Code and National Design Guide, and should be used to inform Camden SA objectives on environmental protection/enhancement and biodiversity.

7. To improve local air quality and limit exposure

We are pleased to see the air quality included as an objection for the Camden SA.

8. To promote the efficient use of energy, water and other natural resources, throughout the life of the development

We actively encourage actions to promote efficiency energy, water and natural resources.

We recommend attention is given the water company drainage and wastewater management plans, which account for climate change, ensuring drainage infrastructure can cope with increased intensity of storms. The Environment Act (2021) made these plans statutory and collaborative, and they should be integrated into long term planning documents.

9. To protect and manage water resources (including groundwater)

We endorse the use of water efficiency measures especially in new developments. Increased water efficiency for all new developments potentially enables more growth with the same water resources.

Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. Furthermore, use of technology that ensures

efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

For sites in locations within Source Protection Zones (SPZs) where groundwater is vulnerable, objectives should recognise the importance of managing risks to groundwater resources associated with deep piled foundations which are typically required for tall buildings.

**10. To ensure our buildings and environment can adapt to a changing climate &
11. To promote high quality and sustainable urban design**

Our latest Adaptation report, [Living Better with a Changing Climate](#), shows that England will inevitably face significant climate impacts, and that early action is essential. In reference to the Climate Change section of the Planning Practice Guidance (PPG) and in line with the objectives of the Climate Change Act 2008, boroughs should tackle climate change and its impacts. Within our remit, we are specifically concerned with significant climate impacts such as flood and coastal risks, water supply and management, biodiversity, and industrial regulation.

To build resilience and account for a changing climate, Camden should be prepared using the latest evidence to identify climate risks, both now and in the future. It is essential to tackle these risks early and so we recommend the Camden SA is informed by a strong evidence base, informed by the following sources:

- <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2022>
- [Independent Assessment of UK Climate Risk - Climate Change Committee \(theccc.org.uk\)](http://theccc.org.uk)
- [UK Climate Projections \(UKCP\) - Met Office](#)

6. Do you have any other data, comments or suggestions that you think may be useful to inform the Sustainability Appraisal?

We have no additional comments to make.

Final comments

Thank you again for contacting us regarding the Camden's SA Scoping Opinion. Our comments are based on our available records and the information submitted to us.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Isabel Smith
Planning Advisor

E-mail: HNLsustainablePlaces@environment-agency.gov.uk

From: [HNL Sustainable Places](#)
To: [REDACTED]
Subject: [REDACTED]opping report
Date: [REDACTED]:23
Attachments: [REDACTED]

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Good afternoon,

The Upper Chalk aquifer is different from the Source Protection Zone (SPZ). Aquifers are naturally occurring, underground layers of rock that are porous enough to act as a store for groundwater. A chalk aquifer just means the type of bedrock that is storing the water is chalk. Whereas SPZs are areas around water extractions points (e.g. boreholes used for human consumption) which are defined by us and depend on the time that water takes to reach the extraction points.

More information on the different types of aquifers can be found online here

<https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution/protect-groundwater-and-prevent-groundwater-pollution#geological-characteristics>.

I can confirm comments relating to the Upper Chalk aquifer are in terms of risk to groundwater contamination and not groundwater flooding.

Unfortunately we are unable to share our GIS layers, however, you can view our source protection zones and aquifer locations through the MagicMap link on the Gov website here

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs#find-groundwater-spzs>.

To find the SPZs, from the MagicMap table of contents on the left-hand side, select in this order:

- designations
- land-based designations
- non-statutory
- source protection zones merged (England) – tick the box

And then to find aquifers, from the MagicMap table of contents on the left-hand side, select in this order:

- Landscape
- Geology and Soils
- Aquifer Designation Map – there's the Bedrock and superficial drift options.

Hope this helps.

Kind regards,

Isabel Smith

Planning Advisor, Hertfordshire & North London Sustainable Places

Environment Agency | [REDACTED]

[REDACTED]
[REDACTED]

HNLsustainablePlaces@environment-agency.gov.uk

Pronouns : she/her ([why is this here ?](#))



Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!

If you're planning a new development, we want to work with you to make the process as smooth as possible. We offer a bespoke advice service where you will be assigned a project manager who will be a single point of contact for you at the EA, giving you detailed specialist advice. This early engagement can significantly reduce uncertainty and delays to your project. More information can be found on our website [here](#).

From: Nicola Tulley

Sent: 10 May 2023 17:13

To: HNL Sustainable Places

Subject: RE: Camden SA Scoping report

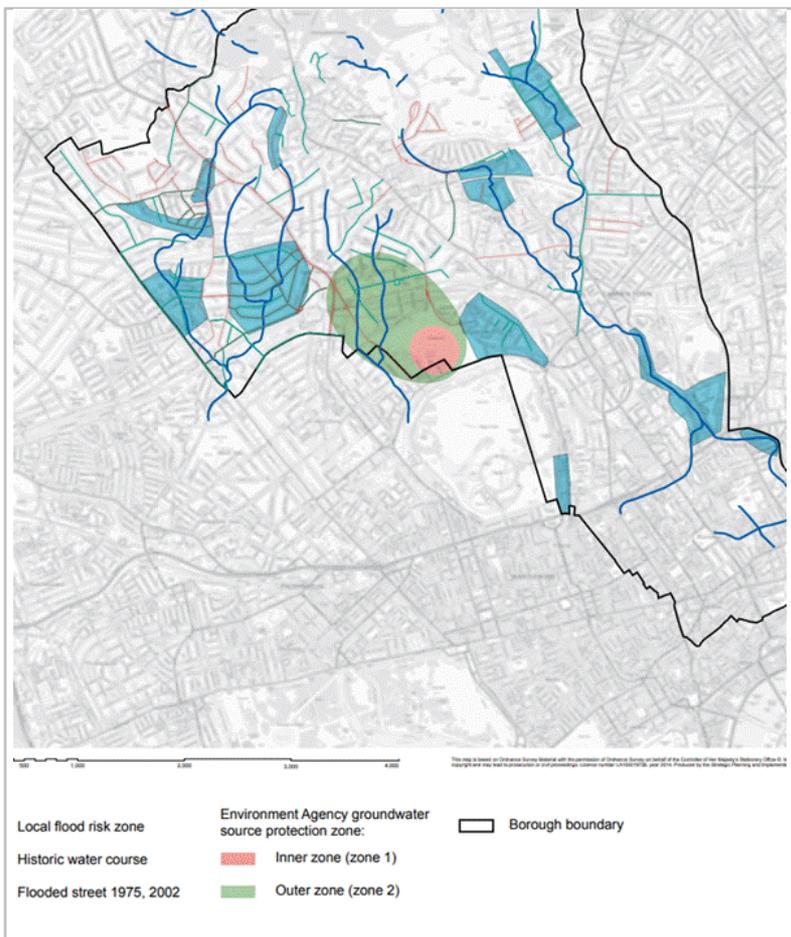
Hello Isabel,

Thank you for your comments on our SA scoping report.

I am updating the SA scoping to reflect your comments. It would be really helpful if you are able to identify where the upper chalk aquifer is – sorry but is this the Source Protection Zone?, in connection to “The Upper Chalk aquifer should be taken in full consideration where developments where deep piled foundations are proposed. Should foundations works penetrate through the London Clay to the Chalk then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised”.

Also to understand what the risk is – is it contamination of the groundwater, not groundwater flooding?

I would appreciate if you could send the GIS layer for the SPZ zone 1 and zone 2 – we just have the image below, could we then use this GIS layer on our internal GIS system?



Many Thanks,
Nicola

--

Nicola Tulley
Principal Planner (Climate Change)

[REDACTED]



From: HNL Sustainable Places <HNL.SustainablePlaces@environment-agency.gov.uk>

Sent: 29 April 2023 23:22

To: Nicola Tulley [REDACTED]

Cc: PlanningPolicy <PlanningPolicy@camden.gov.uk>

Subject: RE: Camden SA Scoping report

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Nicola,

Thank you for consulting us on Camden's SA Scoping Report. Please find attached our formal response.

If you have any questions, please do not hesitate to ask.

Kind regards,

Isabel Smith

Planning Advisor, Hertfordshire & North London Sustainable Places

Environment Agency | [REDACTED]

[REDACTED]

[REDACTED]

HNL Sustainable Places@environment-agency.gov.uk

Pronouns : she/her ([why is this here ?](#))



Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!

If you're planning a new development, we want to work with you to make the process as smooth as possible. We offer a bespoke advice service where you will be assigned a project manager who will be a single point of contact for you at the EA, giving you detailed specialist advice. This early engagement can significantly reduce uncertainty and delays to your project. More information can be found on our website [here](#).

From: Nicola Tulley [REDACTED]

Sent: 03 April 2023 09:57

To: HNL Sustainable Places <HNL Sustainable Places@environment-agency.gov.uk>

Subject: Camden SA Scoping report

You don't often get email from [REDACTED]

Dear Consultee,

We are undertaking a review of our Local Plan (including Site Allocations). As part of this process we have drafted a Scoping Report (attached) to meet the requirements of the Strategic Environmental Assessment Directive we are seeking your views on its scope and level of detail.

We invite your comments on the following questions:

1. Is the document clearly structured and does it cover the main issues in an understandable way?
2. Is the review at Tables 2 and 3 and Appendix 1 of other plans, programmes and sustainability objectives sufficient for the purposes of this document? Are there any other relevant plans, programmes and sustainability objectives that should be taken into account?
3. Do you consider that the range of baseline information is appropriate and/or are there any further baseline indicators that might provide useful information and where might they be sourced?
4. Do you consider that the main sustainability issues have been satisfactorily identified from the baseline information?
5. Do you consider that these proposed SA objectives are sufficient and adequately reflect the key sustainability issues?
6. Do you have any other data, comments or suggestions that you think may be useful to inform the Sustainability Appraisal?

The consultation period is 5 weeks from the date of this email, please send your comments

to: planningpolicy@camden.gov.uk by the 8th May 2023.

Kind Regards,
Nicola Tulley
Principal Planner (Climate Change)
Regeneration and Planning
Supporting Communities
London Borough of Camden

[REDACTED]

Web: camden.gov.uk

Town Hall Extension [REDACTED]

[REDACTED]

[REDACTED]



Please consider the environment before printing this email.

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.

This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.

This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

From: [REDACTED] [le Places](#)
To: [REDACTED]
Subject: RE: Follow up on water quality
Date: 07 May 2025 13:46:53
Attachments: [image002.jpg](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Hi Nicola,

Thank you for your follow-up query and apologies for the delay in our response. Our Groundwater and Land Quality team has been working at reduced capacity lately.

I have requested for answers to your questions, please see the comments in **red** below.

I hope this is helpful. Should you have any questions, please let me know.

Sincerely,

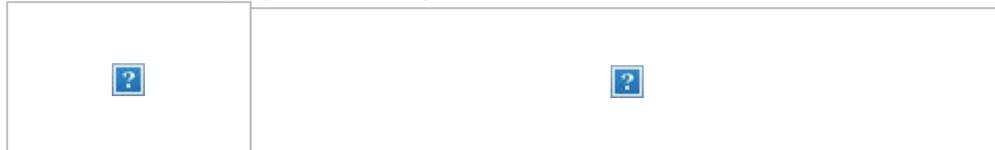
Mohammad Ahmed (Licentiate RTPI, MSc., BSc.(Hons))

Planning Specialist, Hertfordshire & North London Sustainable Places

Environment Agency | [REDACTED]

[REDACTED] HNL.SustainablePlaces@environment-agency.gov.uk

Pronouns: he/him ([why is this here?](#))



Did you know that every email you send with an attachment costs 50g CO₂e per person?

Sending an email with a link only costs 4g CO₂e per person. When emailing a document,

Think Link and help us reach Net Zero.

From: Nicola Tulley

Sent: 12 March 2025 15:55

To: 'Ahmed, Mohammad' <[REDACTED]>

Cc: Katherine Frost <[REDACTED]>; Ferdous, Tanzin

<[REDACTED]>; 'HNL Sustainable Places'

<HNL.SustainablePlaces@environment-agency.gov.uk>

Subject: Follow up on water quality

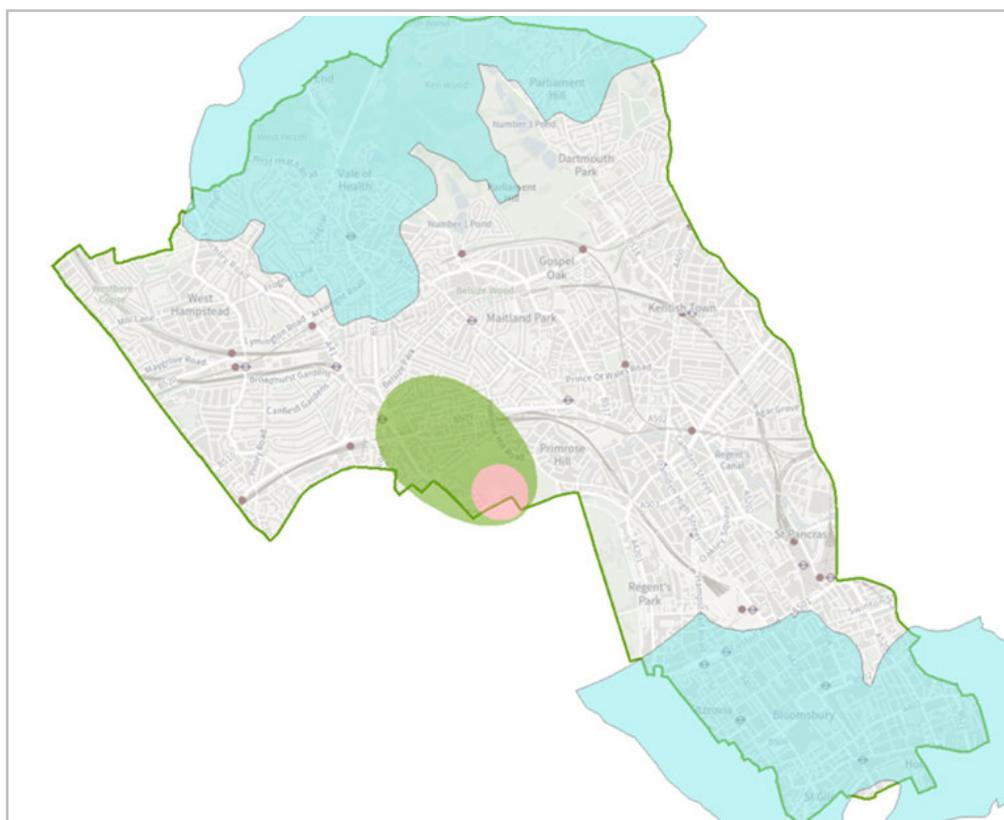
Hello Mohammad,

I hope all is well. It has been sometime since our last email and the draft Local Plan policy on water quality has developed.

We have also had a follow up discussion with planning colleagues who assess planning applications, and would appreciate further advice as to how this policy could be applied in practice. I have set out our advice below but would appreciate your feedback as to whether this is correct as it would apply to the borough of Camden.

We would also like to understand at what depth below ground level is it likely to come across Secondary A Aquifers in the North and South of the borough – to gauge how likely these assessments will be required (I assume the depth is greater in the aquifer north of the borough).

The shallow superficial secondary A aquifers indicated on the figure below in blue (Bagshot formation in the north, and Lynch Hill gravels in the south) are present from the **ground surface to the upper surface of the London Clay**. Based on the borehole logs on the BGS website, the Bagshot formation in the north of the area is approximate 5-10m thick and the Lynch Hill Gravels in the south of the area is approximately 3-5 m thick. Please note that these shallow superficial secondary A aquifers are absent centrally within the LB Camden.



The whole of the LB Camden is underlain by London Clay that is defined as unproductive strata (i.e. does not contain meaningful quantities of groundwater). London Clay is beneath the 2 areas of superficial secondary A aquifer discussed above and effectively protects deeper, more sensitive, aquifers. **London clay is underlain, at depth, by the Lambeth Formation (secondary A aquifer), Thanet Sand (secondary A Aquifer) and the Chalk (principal aquifer) – these deeper aquifers are more sensitive as they are in connectivity with the Chalk that is used for drinking water supply.** These deeper aquifers are present at depths below approximately 50-60m bgl in the north of LB Camden and 20-30m bgl in the south of LB Camden.

Would a Hydrogeological Risk Assessment and a Foundation Works Risk Assessment cover the same things? If so I assume we wouldn't have to ask for both?

No, they are different. The hydrogeological risk assessment (HRA) considers whether the proposed activity as a whole is likely to cause pollution of groundwater – for example we would expect the HRA for a landfill to focus on the disposal activity at its proposed location.

A foundation works risk assessment (FWRA) will focus on the piling / foundation activity associated with the development works only. For the purpose of groundwater protection, the EA is mainly interested in deep foundations / structures that could potentially alter groundwater flow or create contaminant migration pathways that could result in the deterioration of groundwater quality. We only tend to ask for FWRA for sites where foundation proposals are likely to cause disturbance (flow or quality) of groundwater in a sensitive location (i.e, source protection zone or principal aquifer used for water supply or providing baseflow for a groundwater fed surface water feature).

We assume the reference to Ground Source Heat Pumps in [this document](#) only relates to those with vertical boreholes?

The GSHP that we have seen up to now have used vertical boreholes. However, it may be possible to design a system that utilises horizontal boreholes. If the system is built below the water table and/or is reliant on groundwater for heating / cooling we are interested in seeing the details. Some GSHP will require an Environmental Permit.

Many Thanks
Nicola

For applications in the **Source Protection Zones** – please flag to applicants that:

- Where proposals include works that pose a risk to the Source Protection Zone – such as ground source heat pumps (with vertical boreholes), new roads, piling and foundation development and basement excavation – applicants should submit a **Hydrogeological Risk Assessment** with the planning application to the Local Planning Authority and the Environment Agency. If the Hydrogeological Risk Assessment identifies unacceptable risk, the developer will be required to provide appropriate mitigation. ('The Environment Agency's Approach to groundwater protection' identifies a number of development activities which could result in physical disturbance to aquifers and groundwater resources.)
- A **Foundation Works Risk Assessment** is required (where piled foundation works are required as part of the proposed works) – this is to ensure that the risks to groundwater are minimised. (Current available guidance includes the Environment Agency's Piling in layered ground: risks to groundwater and archaeology, and Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (National Groundwater and Contaminated Land Centre report NC/99/73).)

- Where land is potentially contaminated as a result of current or former uses, applicants will be required to carry out a **Preliminary Risk Assessment** to identify any potential impact on water quality. The Council will expect developers to prevent discharges to groundwater through land affected by contamination.

For applications in the borough's **Secondary A Aquifers** – where piled foundation works, or other works likely to extend through London Clay to Secondary A Aquifers (**at what depth is this likely to be**) – please flag to applicants that:

- A **Foundation Works Risk Assessment** is required to ensure that the risks to groundwater are minimised. (Current available guidance includes the Environment Agency's Piling in layered ground: risks to groundwater and archaeology, and Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (National Groundwater and Contaminated Land Centre report NC/99/73).
- Where land is potentially contaminated as a result of current or former uses, applicants will be required to carry out a **Preliminary Risk Assessment** to identify any potential impact on water quality. The Council will expect developers to prevent discharges to groundwater through land affected by contamination.

Nicola Tulley
Principal Planner (Climate Change)



This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.

This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Camden Planning Policy Team
Camden Town Hall
Judd Street
London
WC1H 8EQ

Date: 13 March 2024

Dear Camden Planning Policy Team,

Draft new Camden Local Plan Regulation 18 Consultation (January 2024)

Thank you for consulting us on the draft new Camden Local Plan. Please find our comments related to our planning remit, divided into the thematic policies, evidence base and site allocations.

Part One: Thematic Policies

Theme: Responding to Climate Change

Policy CC1: Responding to the climate emergency

We welcome the link to delivering the actions identified in the Council's Climate Action Plan 2020, and this is a strong overarching policy. We would recommend tying the relevant policy objectives and actions in implementing the recommendations in [The London Climate Resilience Review 2024](#).

We also welcome this policy's inclusion of minimising and avoiding the risk of flooding from all sources and the incorporation of SuDS.

Policy CC3: Circular economy and reduction of waste

We support the requirements to reduce water use during construction and water demand during operation, whilst effectively mitigating air quality impacts. A useful addition to the policy requirements would be to encourage demolition materials to be sorted and utilised on site wherever practicable.

We welcome the safeguarding of Camden's Regis Road waste site. It may be helpful to link this safeguarding to delivering the Agent of Change principle set out in London Plan 2021, Policy D13.

This policy only seems to deal with waste from the building of new developments. We consider that it needs to reference the way waste produced from within the Borough is managed, the relationship with the North London Waste plan as far as provision of waste capacity is concerned and the targets set in the London Plan.

The inclusion of circular economy statements is welcomed, but these only apply to major developments. All developments should facilitate the movement of waste up the hierarchy and should be mindful of the collection systems employed by the Council.

When designing the street scenes, opportunities should be presented to collect

Cont/d..



INVESTOR IN PEOPLE



materials for recycling and provide safe collection of waste with respect to pedestrians and other vulnerable road users.

Policy CC4: Minimising carbon emissions

We support this policy and the requirement for developments to submit whole life carbon assessments, which align with the London Plan.

Policy CC6: Energy reduction in new buildings

In the supporting text for this policy, we would recommend that a paragraph be added acknowledging that increased water efficiency can reduce requirements.

Policy CC8: Overheating and cooling

We support this policy and recommend that reference is made to [The London Climate Resilience Review 2024](#), which identifies heat risk as one of the principal climate risk for London.

Policy CC9: Water efficiency

We are pleased to see that this policy requires residential developments to achieve a water efficiency of 110 liters of water per head per day. This demonstrates that Camden is aware of the need to improve water efficiency in London and puts the emerging Local Plan in line with Policy SI 5 of the London Plan.

We are also pleased to see that this policy will strongly encourage proposals for residential developments to achieve even higher levels of water efficiency. We would, however, invite Camden to strongly consider making the mentioned level of higher efficiency (85 litres per person per day; page 243) a requirement for residential developments. This requirement has already been proposed in London within the Tower Hamlets emerging plan setting a water efficiency of 80 litres per head per day (Policy CG8 1a). Such commitments are highly valued in an area where there is serious water stress, and we would be very supportive of the emerging Camden Local Plan were it to make 85 litres per person per day a policy requirement.

We acknowledge the BREEAM targets the plan has set for non-residential developments (Policy CC9 A.iii, pages 243-244). However, we would suggest the Camden Local Plan removes the dispensation 'unless it can be demonstrated that it is not technically feasible' (page 244). In light of the water resources situation in London we do not feel that is appropriate for new developments to achieve anything less than the BREEAM rating of 'excellent' in WAT 01. We note that this dispensation does not exist in the London Plan and would like to highlight that the Camden Local Plan does need to align with the policies within the London Plan (in this case, London Plan Policy SI 5 C2; page 356).

We appreciate the specific mention of rainwater harvesting. This places the draft new Local Plan in line with the intentions of the London Plan, which placed rainwater harvesting at the top of its SuDS hierarchy (Policy SA 13 B). We are also supportive of the requirement for major and high/intense water use buildings to include a grey water system. However, we suggest that the dispensation of 'unless it is demonstrated... that this is not feasible or practical' be removed. Grey water recycling systems are not considered impractical in new developments, and they represent a fantastic opportunity to realise considerable water efficiency improvements. A 2010 study by the Environment Agency demonstrated that greywater recycling in an 80-room hotel can offset mains water by up to 1039m³ water per year, and up to 1270m³ water per year in a 10,000m² office block. We therefore do not believe that Camden Council should accept any new development that does not include grey water recycling.

Finally, the current regional levels of high water use are driven in part by inefficient water use in existing building stock. If existing water usage is to be reduced, then improving the efficiency of points-of-use in current buildings is just as important as those in new developments. The emerging Local Plan stipulates that retrofits of existing building stock should be made to achieve reductions in energy use (Policy CC1 A.i, page 225), noise pollution (Policy A4 A.vi, page 368) and biodiversity gains (paragraph 11.31, page 312). We would like to see a line in Policy CC9 that insists that all retrofits, refurbishments and/or changes of building include the installation of water efficient fittings and fixtures. We would also like for the retrofitting of rainwater harvesting/grey water recycling systems to be encouraged. Such retrofits are mandated by part C3 of the London Plan Policy SI 5 (page 356). This policy element states that existing buildings should be retrofitted in order to achieve improved water efficiency. This retrofitting of existing spaces and buildings is also a priority of the [London Sustainable Drainage Action Plan](#). There are [BREEAM Technical Standards](#) documents to support the retrofitting of commercial and residential buildings.

Policy CC11: Flood Risk

We welcome the recognition of the issue of flooding through Local Flood Risk Zones. A commitment to conducting an Integrated Water Management Strategy in locations identified for major re-development would contribute to surface water flood management in combination with delivering Camden's ambitions for sustainable sources of water supply.

We are overall supportive of this policy, particularly in regard to:

- reducing flood risk
- mitigating the impacts of flooding
- setting out the requirements for site-specific Flood Risk Assessments
- supporting the retrofitting of flood resilience and flood resistance measures

Policy CC12: Sustainable drainage

We encourage the use of infiltration SUDs as this is a sustainable approach to surface water management that mimics natural processes and we are pleased to see that this policy, and the four spatial policies, require major developments to achieve greenfield run-off rates through the application of SuDS systems. It is important that these systems are properly designed and managed if they are to function correctly. We therefore suggest that the language of policy be strengthened from 'the Council will expect...' to 'the Council will require...'.

We acknowledge that the emerging plan has reference the SuDS hierarchy in the London Plan. We suggest that it also includes references to the [CIRIA SuDS manual](#) (as utilised by the London Plan) and the [London Sustainable Drainage Action Plan](#). We also recommend references be made to the [Camden Surface Water Management Plan](#).

However, the use of infiltration SuDS is not appropriate on all sites and in all locations. Infiltration SuDS should not be constructed in contaminated ground, and should not be used where infiltration can re-mobilise contaminants already within soils to pollute groundwater. Where peak seasonal groundwater levels are shallow this may constrain the potential for infiltration drainage or the choice of infiltration SuDS due to a requirement to maintain a minimum unsaturated zone thickness beneath the infiltration level. The use of deep infiltration systems such as boreholes is not routinely acceptable and will only be approved where there are no other feasible disposal options such as shallow infiltration systems or drainage fields/mounds and where the developer demonstrates no unacceptable pollution risk to groundwater; if approved they may

require an environmental permit. In all cases the SuDS train should provide sufficient water quality treatment in line with the land use of the drainage catchment and sensitivity of the receiving groundwater body. We recommend that the following guidance be referenced:

- [The Environment Agency's Approach to Groundwater Protection](#), particularly statements G1 and G9 to G13
- The [CIRIA C753](#) SuDS Manual
- The [Susdrain website](#)
- The [Sustainable Drainage Systems: Non-Statutory Technical Standards](#) guidance on gov.uk and the [Recommendations To Update](#) these.

Theme: The Natural Environment

Policy NE1: The Natural Environment

We are pleased to see that the inter-related nature of different aspects of a development are recognised i.e. through the cross-referencing of 'Policy CC12 Sustainable Drainage' in this policy on the natural environment, and the potential for associated delivery efficiencies that this brings. For this same reason, we would recommend that Policy CC12 also referenced in 'Policy NE2 Biodiversity'.

We recommend including policy support for the [London Plan's Urban Greening Factor](#).

Policy NE2: Biodiversity

We are pleased to see that this policy requires biodiversity net gain of at least 10% on eligible sites, however we would recommend the following to improve and strengthen this policy:

- It would be worth mentioning the importance of forward planning when considering BNG designs from the very initial inception of a development scheme idea.
- It would be useful to include wording which reiterates the requirement for developments to scope in aquatic habitats.
- The management and monitoring section should highlight the requirement to create a habitat management and monitoring plan (HMMP) alongside BNG submissions. These plans should give a detailed schedule of:
 - The plan to manage the off-site gains or significant on-site enhancements, taking into account any legal restrictions and requirements.
 - When and how habitats will be monitored (this will vary for different types of habitat).
 - When and how monitoring results will be reported.
 - When and how management proposals will be reviewed.
 - How habitats will be restored if the management plan is not working.
 - The management and monitoring period lasts for 30 years.

Policy NE4: Water Quality

With respect to groundwater and land quality issues this is a strong plan, with strong policies, for which our previous comments have been incorporated really well into the proposed policies.

We would however recommend that reference is made to the following:

- Specific National Planning Policy Framework (NPPF) paragraphs 180 and 189 should be considered with respect to groundwater and land quality issues.
- Developers should follow the risk management framework provided in [Land Contamination : Risk Management \(formerly CLR11\)](#) when dealing with groundwater and land quality issues.

- The Environment Agency’s [Approach to Groundwater Protection](#) should be considered with regard to development proposals (i.e. sub-water table storage of hazardous substances) for which we would object to in principle.

We cannot see any reference to the Water Framework Directive (WFD) in the emerging plan. This should be rectified. Under [regulation 33 of the Water Framework Directive \(WFD\)](#), Camden Council has a legal responsibility to have regard for the [Thames River Basin Management Plan](#), which in turn has a legal responsibility to ensure that there is no deterioration in the ecological status of any WFD water body or of its associated elements. Camden Council therefore has a legal responsibility to avoid the deterioration of WFD water bodies and their associated elements, and to support their enhancements. These responsibilities are reinforced by the London Plan Policy SI 5 D1 (page 356).

Theme: Design and Heritage

Policy D1: Achieving Design Excellence

We welcome the policy and the identification of environmental design criteria. It remains unclear what the requirement (D1 A.) for achieving ‘excellence’ in architecture and design means in practice, and whether there are benchmarks which the Council wishes to identify. We recommend referring to the [London Review Panel](#), and to the [Housing Design Standards London Plan Guidance](#).

Theme: Protecting Amenity

Policy A3: Air Quality

Policy A3 refers to AQ Neutrality and AQ, in line with London Plan guidance and we welcome that support.

It would be useful to link Policy A3 to other policies in the plan that mention ‘Agent of Change’ as a principle (see comments on Policies IE, and on A4). Where sensitive development is proposed near industrial sites that may cause adverse impacts due to dust or odours such as waste management facilities, etc. the ‘Agent of Change’ principles contained within the London Plan should be used to mitigate risks to residents and other users.

Policy A4: Noise and vibration

We welcome that the Agent of Change principle is supported under A4. iii. However, as commented above, excess noise is only one potential nuisance, and it should be clear that the Agent of Change principle is appropriate to a range of potential nuisances.

Theme: Safe, Healthy and Sustainable Transport

Policy T1: Safe, Healthy and Sustainable Transport

Welcome reference to this policy supporting delivery of the Council’s Clean Air Action Plan and Climate Action Plan. We suggest there is also scope for Policy T1 to support the Council’s Biodiversity Action Plan, and to encourage transport schemes to deliver benefits for the natural environment, including connectivity for nature, and SuDs to mitigate road run-off.

We would also suggest reference to Policy CC12 Sustainable Drainage for consistency of language.

Part Two: Evidence Base

Camden Surface Water Management Plan

We note that the Camden Surface Water Management Plan was produced in 2011. We recommend that Camden Council commission a new study. A new study would highlight opportunities to reduce the volume of contaminated urban run-off entering watercourses, to minimise the volumes of surface water entering the sewer network, and to increase the possibility of rainwater reuse. This can better inform the policies and supporting text for Policies CC9, CC12, NE4, and the Camden area sections. More information on surface water management plans can be found here: [Surface water management plan technical guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/271121/Surface_water_management_plan_technical_guidance.pdf).

Water Cycle Studies

Water cycle studies are a recommended approach for understanding not only the pressures an area puts onto the sewage network but also the demands that it places upon the water supply. Water cycle studies can also highlight opportunities for interventions that may alleviate either or both stresses (for example, what kind of SuDS may be appropriate in which location). As above, a water cycle study can greater inform the policies and supporting text for Policies CC9, CC12, NE4, and the Camden area sections More information on water cycle studies can be found here: [Water cycle studies - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/271121/Water_cycle_studies.pdf).

Strategic Flood Risk Assessment (SFRA)

The primary source of flooding in Camden is surface water. With no flood risk from rivers and with the allocated sites all in Flood Zone 1, we have no comments to make on the SFRA.

Integrated Water Management Strategy

There may be opportunities in Camden to commission an Integrated Water Management Water Management Strategy to support the policy requirements, given the designation of Opportunity Areas for growth at Euston, Kings Cross, and Tottenham Court Road.

Part Three: Site allocations

Please see appendix one for our full review of site allocations.

Groundwater and land quality

With respect to groundwater and land quality issues each site allocation should follow the advice set out in the Water Quality section of the local plan (Policy NE4) and the advice we have provided for this policy.

Industrial site allocations

For site allocations with an industrial end use it is noted that certain industrial activities require an environmental permit. Developers are advised to use the [Check if you need an environmental permit](#) guidance and/or contact the Environment Agency for any queries regarding potential permitting requirements.

Flood risk

All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.

Final comments

Thank you again for seeking our representation on the Draft new Camden Local Plan Regulation 18 Consultation. We trust that the comments presented in this letter are

clear and informative and would welcome the opportunity to meet with you to discuss in more detail any issues or queries you may have.

Should you have any queries regarding this response or require additional information or guidance on any of the points raised, please do not hesitate to contact me.

Yours sincerely,

Imogen Nayager-Stafford
Planning Specialist


Email: hnlustainableplaces@environment-agency.gov.uk

Appendix one – full review of site allocations

South Camden site allocations

Site number	Site	Environmental constraints
S4	120 -136 Camley Street	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
S5	104 Camley Street, 108 – 114 Camley Street and Cedar Way Industrial Estate, 3- 30 Cedar Way	<ul style="list-style-type: none"> • Active IPPC site 66m from RLB - Kings Cross Energy Centre - Current PAS no: WE6646AB • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush Protected species: Threatened lichen record
S6	24- 86 Royal College Street	<ul style="list-style-type: none"> • Borehole on site: IDRIS LTD PRATT STREET (chalk group) • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush Protected species: Threatened lichen record
S7	St Pancras Hospital, 4 St Pancras Way, NW1 0PE	<ul style="list-style-type: none"> • Borehole on site: ST PANCRAS HOSPITAL (chalk group) • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush Protected species: Threatened lichen record
S8	Shorebase Access Land, Pancras Road, NW1 1UN	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush Protected species: Threatened lichen record
S9	Bangor Wharf and Eagle Wharf, Georgiana Street, London NW1 0QS	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush Protected species: Threatened lichen record Protected species: European Eel migratory route (GUC)
S10	Network Building, 95-100 Tottenham Court Road and 76-80	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)

	Whitfield Street and 88 Whitfield Street, W1T	<ul style="list-style-type: none"> • Superficial Aquifer (Secondary A) •
S11	14 – 19 Tottenham Mews, W1T 4AA	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive) • Superficial Aquifer (Secondary A)
S12	330 Grays Inn Road, WC1 8DA	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
S13	Former Belgrove House, 13 –21 Euston Road, King's Cross WC1H	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
S14	271-273 Pentonville Road, King's Cross, N1 9NL	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
S15	22- 24 Pakenham Street and 21 Wren Street	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive) • Bedrock Aquifer (Secondary A) • Superficial Aquifer (Secondary A)
S16	Land to the Rear of British Library, Euston Road	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush • Protected species: Threatened lichen record
S17	Lethaby Building and Cochrane Theatre, 12-42 Southampton Row, 1-4 Red Lion Square, Holborn, WH1B 4AF	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive) • Superficial Aquifer (Secondary A)
S18	Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street, WC1A 1LY	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive) • Superficial Aquifer (Secondary A)
S19	135 – 149 Shaftesbury Avenue, Holborn, WC2H 8AH	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive) • Superficial Aquifer (Secondary A)
S20	Agar Grove Estate	
S21	St Pancras Commercial centre	
S22	6 St Pancras Way	
S23	Tybalds estate (infill)	
S24	294-295 High Holborn	

S25	156 – 164 Gray's Inn Road	
S26	8-10 Southampton Row	
S27	60-67 Shorts Gardens and 14-16 Betterton Street	
S28	Cockpit Yard and Holborn Library, 32-38 Theobalds Road, WC1X 8PA	
S29	18 Vine Hill and 15-29 Eyre Street Hill	
S30	Middlesex Hospital Annex 44 Cleveland Street	
S31	Central Somers Town	
S32	Chalton Street, Godwin and Crowndale estate	
S33	Birkbeck College, Malet Street	
S34	Senate House, (NE quadrant) Malet Street	
S35	20 Russell Square	

Central Camden site allocations

Site number	Site	Environmental constraints
C2	Regis Road, Holmes Road Depot	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C3	J. Murphy & Sons Limited, Highgate Road	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C4	Kentish Town Police Station, 10-12A Holmes Rd	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C5	369-377 Kentish Town Road	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C6	Kentish Town Fire Station, 20 Highgate Rd	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C7	Morrisons supermarket, Chalk Farm Road NW1 8EH	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C8	Former Morrisons Petrol Filling Station, Chalk Farm Road NW1 8EH	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C9	100, 100a and 100b Chalk Farm Road NW1 8EH	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C10	Juniper Crescent housing estate	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)

C11	Network Rail land at Juniper Crescent	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C12	Gilbeys Yard housing estate NW1	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C13	West Kentish Town estate, NW5	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C14	Wending Estate and St Stephens Close, NW5	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C15	Shirley House; 25 -27 Camden Road	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C16	1-8 Stucley Place, 5–7 Buck Street and 25–27 Kentish Town Road	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C17	109 Camden Road, London, NW1 9HZ	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C18	211 Arlington Road, London, NW1 7HD and 33-35 Jamestown Road, NW1 7DB	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
C19	Highgate Centre, Highgate Road	
C20	Grand Union House, 18 – 20 Kentish Town Road	
C21	Heybridge garages, Hadley Street	
C22	Bacton Low Rise, Haverstock Road	
C23	Former Charlie Ratchford centre	
C24	52 Avenue Road	
C25	5-17 Haverstock Hill (Eton garages)	

West Camden site allocations

Site number	Site	Environmental constraints
W2	O2 Centre, car park, car showrooms and 14 Blackburn Road, West Hampstead, NW6	<ul style="list-style-type: none"> • Historic Landfill (Canfield Place) • Bedrock Aquifer (unproductive)
W3	11 Blackburn Road; West Hampstead, NW6 1RZ	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
W4	13 Blackburn Road; West Hampstead, NW6 1RZ	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
W5	188- 190 Iverson Road; West Hampstead, NW6 2HL	<ul style="list-style-type: none"> • Bedrock Aquifer (unproductive)
W6	Meridian House, 202- 204 Finchley	<ul style="list-style-type: none"> • Bedrock Aquifer

	Road, NW3 6BX	(unproductive) <ul style="list-style-type: none"> Protected Species (Threatened bryophyte record)
W7	Gondar Gardens Reservoir, Gondar Gardens, NW6 1QF	<ul style="list-style-type: none"> Bedrock Aquifer (unproductive) Protected Habitats (Deciduous woodland)
W8	Land at Midland Crescent / Finchley Road	
W9	BP Petrol Station, 104A Finchley Road, NW3 5EY	
W10	Abbey Co-op Housing site, Emminster and Hinstock	
W11	100 Avenue Road	
W12	Former Liddell Road Industrial Estate	
W13	551-557 Finchley Road	
W14	317 Finchley Road	

North Camden site allocations

Site number	Site	Environmental constraints
N2	Mansfield Bowling Club, Croftdown Road, Highgate, NW5 1EP	<ul style="list-style-type: none"> Bedrock Aquifer (unproductive)
N3	Queen Mary's House, 124 Heath Street, Hampstead, NW3 1DU	<ul style="list-style-type: none"> Bedrock Aquifer (Secondary)
N4	Hampstead Delivery Office; Shepherds Walk, NW3 5UF	<ul style="list-style-type: none"> Protected Species (Threatened bryophyte record) Bedrock Aquifer (Secondary)

Planning Policy Team
Camden Council

Date: 27 June 2025



Email: planningpolicy@camden.gov.uk

Camden Local Plan – Proposed Submission Draft – Regulation 19

Thank you for consulting us on the above proposed submission draft for the new Camden Local Plan.

Having reviewed the submitted information, we have the following comments to make on environmental considerations within our statutory remit. The comments are divided into:

- Local plan policies and content
- Evidence base
- Site allocations

We believe that the draft local plan is sound in terms of environmental considerations within our remit. We would like to share the

Local Plan policies and content

Policy CC1: Responding to climate change

We welcome the additional policy clauses around retrofitting to support better energy efficiency of existing buildings.

Policy CC3: Circular economy and reduction of waste

We are pleased to see the inclusion of clause b(4) around on-site sorting and re-use of materials. We also welcome the inclusion of Figure 19 that outlines the waste hierarchy established in the North London Waste Plan.

As recommended in our Regulation 18 response, we believe that all development (not just major development) should demonstrate the facilitation of the movement of waste up the hierarchy.

Policy CC6: Energy reduction in new buildings

In the supporting text for this policy, we would recommend that a paragraph be added acknowledging that increased water efficiency can reduce requirements.

Policy CC8: Overheating and cooling

We support this policy and recommend that reference is made to [The London Climate Resilience Review 2024](#), which identifies heat risk as one of the principal climate risk for London.

Policy CC9: Water efficiency

While we trust that this policy is sound and welcome the requirement for residential development to achieve a water efficiency of 110 litres of water per head per day; we would request the council to consider recommendations from our Regulation 18 response (dated: 13 March 2024), which we believe can make the policy more robust and effective.

Policy CC10: Flood Risk

We are supportive of this policy and have no further comments since our Regulation 18 response.

Policy CC11: Sustainable drainage

We welcome the amended policy wording under clause C of this policy.

We are pleased to see the inclusion of SuDS guidance in paragraph 8.157 and would like to re-share the following resources that can be extremely beneficial while designing efficient SuDS:

- [The Environment Agency's Approach to Groundwater Protection](#), particularly statements G1 and G9 to G13
- The [CIRIA C753](#) SuDS Manual

Policy NE1: The Natural Environment

We have no further comments to add to this policy.

Policy NE2: Biodiversity

We are supportive of this policy and request the council to consider recommendations shared in our Regulation 18 response (dated: 13 March 2024).

Policy NE4: Water Quality

We are pleased to see the inclusion of the Thames River Basin Management Plan and the Water Framework Directive in the supporting text for this policy.

Policy T1: Safe, Healthy and Sustainable Transport

We welcome the inclusion of wording around SuDS in clause 3 of the policy.

Evidence base

We have no further comments to add in relation to the evidence base submitted as part of the draft local plan since our Regulation 18 response (dated: 13 March 2024).

Site allocations

Please refer to our Regulation 18 response (dated: 13 March 2024) for extensive comments on site allocations in terms of environmental constraints within our remit. These were attached as Appendix one to the said response

Final comments

Thank you again for seeking our representation on the proposed submission draft of the new Camden Local Plan. We trust that the comments presented in this letter are clear and informative and would welcome the opportunity to meet with you to discuss in more detail any issues or queries you may have.

Should you have any queries regarding this response or require additional information or guidance on any of the points raised, please do not hesitate to contact me.

Yours sincerely,

Mohammad Ahmed
Planning Specialist

Email: HNL.SustainablePlaces@environment-agency.gov.uk