

## **6.4 Water Resources, Drainage and Flood Risk**

- 6.4.1 Chapter 9 of the 2022 ES reported the likely significant water resources, drainage and flood risk effects of the development on existing receptors during the construction and operational phase and considered concentrations at new receptor locations introduced.
- 6.4.2 This Section has been prepared in order to outline the key changes in relation to the 2023 Consent and to identify any changes to the findings and conclusions associated with the 2022 ES.

### **Scheme Changes**

- 6.4.3 The main scheme changes in the Proposed Development related to this chapter are the following:
- Reconfiguration of N4 and N5 for improved design rationalisation, leading to a smaller N4 building footprint and removal of N4D. The smaller building footprint and the removal of N4D will reduce the area of hardstanding. This has been considered in more detail within Appendix 6.4.1 Flood Risk Assessment Addendum and Appendix 6.4.2 Sustainable Drainage Report Addendum, of this ES Addendum.
  - Changes to landscaping, which are considered in more detail within Appendix 6.4.1 and 6.4.2.

### **Legislation, Planning Policy and Guidance**

- 6.4.4 A review of UK legislation, planning policy and guidance relevant to the proposals has been previously undertaken as part of the 2022 ES. Since the 2022 ES, the National Planning Policy Framework (NPPF) has been updated, as well as the London Borough of Camden Flood Risk Management Strategy – as set out below:

#### **National Planning Policy Framework**

- 6.4.5 An updated version of the NPPF has been published, in December 2024<sup>i</sup>. The updates made to the NPPF do not materially change the outcome of the assessment made in the 2022 ES, for water resources, drainage and flood risk.

#### **London Borough of Camden Flood Risk Management Strategy**

- 6.4.6 Since the 2022 ES, Camden's 2013 Flood Risk Management Strategy (FRMS) has been updated, to one published in 2022<sup>ii</sup>. The FRMS sets out how Camden Council, in its role as Lead Local Flood Authority for Camden, and partner authorities will work together to manage flood risk between 2022 and 2027.

- 6.4.7 Both the 2013 and 2022 FRMSs state that the main risk of flooding in Camden is from surface water runoff and surcharging flooding from combined sewers which have exceeded their capacity due to heavy rainfall.
- 6.4.8 Overall the update to the 2013 FRMS does not change the outcome of the assessment made in the 2022 ES.

### **Assessment Methodology and Significance Criteria**

- 6.4.9 The following section outlines the methodologies applied to identify and assess the potential impacts and likely effects to result from the Proposed Development.

#### **Extent of The Study Area**

- 6.4.10 This remains as described in the 2022 ES.

#### **Method of Baseline Collection**

- 6.4.11 This remains as described in the 2022 ES.

#### **Method of Assessment**

##### *Demolition & Construction Phase*

- 6.4.12 This remains as described in the 2022 ES.

##### *Operational Phase*

- 6.4.13 This remains as described in the 2022 ES.

### **Significance Criteria**

- 6.4.14 This remains as described in the 2022 ES.

### **Consultation**

- 6.4.15 There has not been any additional consultation regarding water resources, flood risk and drainage since the 2022 ES. The consultation comments shown in Table 9.1 of the 2022 ES are addressed within the Flood Risk Assessment Sustainable Drainage Report and have been updated as required in Appendix 6.4.1 and 6.4.2.

### **Assessment of Effects, Mitigation and Residual Effects**

#### **Demolition & Construction Phase**

- 6.4.16 This section identifies and assesses the scale and nature of the main effects arising from the Proposed Development during the construction phase.

#### Changes to Current Drainage Regime

- 6.4.17 The effect would remain as described in the 2022 ES, as minor negative significance. This would be considered indirect, would occur over the long term and be permanent.

#### Mitigation

- 6.4.18 The mitigation proposed remains as described in the 2022 ES.

#### Residual Effect

- 6.4.1 The residual effect will remain as defined in the 2022 ES, which is a negligible significance on flood risk downstream.

#### Pollution Risk

- 6.4.2 The effects remain as described in the 2022 ES. There would be a minor negative effect on the sewerage system from pollution risk without mitigation. The effect would be direct, occur in the short term and be temporary in nature.
- 6.4.3 There would be a minor negative effect of pollutants or contaminants entering the groundwater supply without mitigation. The effect would be direct, occur in the short term and be temporary in nature.

#### Mitigation

- 6.4.4 The mitigation proposed remains as described in the 2022 ES.

#### Residual Effect

- 6.4.5 As defined in the 2022 ES, the magnitude is considered negligible. As the receptor is low sensitivity, the residual effect will be of negligible significance.

#### Flood Risk Impacts

- 6.4.6 The effects remain as described in the 2022 ES. There would be a negligible effect, which would be direct, occur in the short term and be temporary in nature.

#### Mitigation

- 6.4.7 The inclusions of temporary drainage arrangements are proposed as well as recommending that construction compounds, material stockpiles, car parks, site offices and other structures are positioned away from areas of high risk wherever possible.

#### Residual Effect

- 6.4.8 The effect would remain as negligible significance.

### **Operational Phase**

- 6.4.9 This section identifies and assesses the scale and nature of the main effects arising from the Proposed Development during the operational phase.

#### Impact of Runoff Quantity

6.4.10 As in the 2022 ES, the Proposed Development will be restricted to a lower runoff rate, QBar rates, which equates to 95-98% reduction in the rate currently discharging to the same receiving sewer. The effect would remain as minor beneficial, which would be indirect, occurring in the long term and be permanent in nature.

#### Mitigation

6.4.11 The mitigation proposed remains as described in the 2022 ES.

#### Residual Effect

6.4.12 The residual effect would remain as minor beneficial significance.

#### Impact on Runoff Quality

6.4.13 Since the 2022 ES the proposed Sustainable Drainage Systems (SuDS) have not changed, they will still include swales and green roofs. The effect on runoff quality would be minor positive and direct, occur in the long term and be permanent in nature.

#### Mitigation

6.4.14 As stated in the 2022 ES, no further mitigation is necessary.

#### Residual Effect

6.4.15 The residual effect would remain minor positive and direct, occur in the medium term and be permanent in nature.

#### Flood Risk Impacts

6.4.16 The Development Site is wholly within Flood Zone 1. The discharge rate will be equivalent to QBar rates, which will result in a 95-98% reduction in the current discharge rates. This would result in a beneficial low magnitude effect, to a medium sensitive receptor. As such the effect would be minor beneficial, direct, occur in the long term and be permanent in nature.

#### Mitigation

6.4.17 Appendix 9.1 and 9.2 of this ES Addendum will also help to mitigate the surface water flooding risk currently shown across the Site.

#### Residual Effect

6.4.18 The residual effect would remain minor beneficial, direct, occur in the long term and be permanent in nature.

#### Foul Sewerage

6.4.19 In the 2022 ES it was understood that the receiving Wastewater Treatment Works (WwTW) had enough hydraulic capacity to receive additional flows from the new development. As the 2023 Consent was granted subject to a Section 106 Legal Agreement, it is considered that Thames Water will still have sufficient capacity to receive additional flows from the new development.

6.4.20 As such the effect will remain the same as to a negligible effect. These effects would be indirect, occur in the long term and be permanent in nature.

#### Mitigation

6.4.21 As stated in the 2022 ES, no further mitigation is necessary.

#### Residual Effect

6.4.22 The residual effect would remain negligible, indirect, occur in the long term and be permanent in nature.

#### Water Supply

6.4.23 As stated in the 2022 ES, Network reinforcements may be required to supply infrastructure in the area, but it is anticipated that supply can be accommodated in a sustainable way. The effect will be minor negative effect. Any effect would be indirect, long term and permanent.

#### Mitigation

6.4.24 As in the 2022 ES, no further mitigation is necessary.

#### Residual Effect

6.4.25 The residual effect would remain minor negative, indirect, occur in the long term and be permanent in nature.

### **Severability**

6.4.26 The updated severability plan shows the extent of the severable area within Plot S8 within the Outline Element West. It is the applicants' firm intention to deliver this plot in accordance with the approved parameter plans through the submission of reserved matters pursuant to the hybrid planning permission. This will maximise the public benefits that will result from the development. However, it is recognised that an extant planning permission (ref PWX0202103), together with an extant section 73 permission (ref. 2023/1292/P), (collectively the "Builder's Merchant Scheme") exist in relation to this part of the Site, and as a consequence this area has been identified as severable. In order to ensure a robust approach, an assessment has been made of the environmental impacts that would potentially arise in the event that the Builder's Merchant Scheme is brought forward under those existing extant planning permissions rather than this area being developed pursuant to reserved matters under the hybrid consent.

6.4.27 On the basis that development of the Builder's Merchant Scheme would need to adhere to the same drainage principles as set out in the London Plan and Camden drainage policies to ensure no increase in flood risk as a result of the development, there would be no differences in the potential effects on water resources and flood risk as a result of the relevant area of Plot S8 being severed from the main masterplan and the Builder's Merchant Scheme coming forward in its place.

### **Limitation and Assumptions**

6.4.28 The limitations and assumptions remain as stated in the 2022 ES.

### **Summary & Conclusions**

6.4.29 Since the 2022 ES, the NPPF and London Borough of Camden Flood Risk Management Strategy have been updated. However, these updates are minor and do not change the outcome of the assessment made in the 2022 ES.

6.4.30 In addition to minor changes in policy, there have been minor changes in the Proposed Development. The changes relevant to this Chapter are a smaller N4 building footprint, the removal of building N4D and changes to landscaping.

6.4.31 The technical appendices accompanying this Chapter have been updated. These are provided in Appendix 6.4.1 Flood Risk Assessment Addendum and Appendix 6.4.2 Sustainable Drainage Report Addendum, of this ES Addendum.

6.4.32 As in the 2022 ES, the assessment concludes that no significant environmental impacts are predicted with the prescribed mitigation in place. No changes have been identified to the findings of the 2022 ES. There are no differences in effects arising from the relevant part of Plot S8 being severed and developed separately pursuant to the Builder's Merchant Scheme.

## References

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- i Secretary of State, 2024. National Planning Policy Framework. London, HMSO.
- ii London Borough of Camden, 2022. Managing flood risk in Camden, Camden's Flood Risk Management Strategy. London, Camden Council.