

Application No:	Consultees Name:	Received:	Comment:	Response:
2025/0594/P	Bronte Giles	18/02/2025 15:09:59	COMMNT	

Christopher Smith
Camden Town Hall Extension,
Argyle Street,
London,
WC1H 8EQ

Our ref: NE/2025/137889/01
Your ref: 2025/0594/P

Date: 18 February 2025

Dear Christopher,

120 - 136 Camley Street & 3 - 30 Cedar Way London N1C 4PG & N1C 4PD

Request an Environmental Impact Assessment (EIA) scoping opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for a mixed-use commercial and residential redevelopment scheme.

Thank you for consulting us on the above application on 12 February 2025.

Based upon a review of the submitted information, the proposed development raises no environmental concerns within our remit. We therefore have no comments to make. Please take note of the advice outlined below.

Use of Sustainable Drainage Systems (SuDS)

Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 181 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

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- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

Water Resources

Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. 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 all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Residential developments

The supply of water in the area is under serious water stress (as identified in our report: Water stressed areas – 2021 classification). All residential developments must therefore achieve the higher water consumption efficiency standard of 110 litres per person per day, as set out within the Building Regulations &c. (Amendment) Regulations 2015. This standard or higher may already be a requirement of the local planning authority.

Commercial/Industrial developments

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.

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

Yours sincerely,

Bronte Giles
Sustainable Places Planning Advisor

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				E-mail HNL SustainablePlaces@environment-agency.gov.uk Phone 020 3025 5835

Total: 15