

Laura Dorbeck

From: Katherine Frost
Sent: 05 January 2023 16:36
To: Laura Dorbeck
Cc: Nicola Tulley
Subject: West Kentish Town Estate EIA Scoping Report 2022/5281/P

Laura

I have considered the West Kentish Town Estate EIA Scoping Report by Trium:

Floods and SuDS

Discussion for Scoping Out

- 35 The Proposed Development is located within Flood Zone 1 and is deemed to be at low risk from fluvial flooding. Other potential sources of flooding have been considered and the overall risk is considered to be low.
- 36 Impacts arising during the demolition and construction stages are unlikely due to the implementation of standard mitigation measures (as noted above) both pre-commencement of works and through the demolition and construction phase. These measures will be presented within **ES Volume 1, Chapter 15: Environment Management, Mitigation and Monitoring Schedule**. It is anticipated that appropriately worded planning conditions will be attached to any planning permission to secure these measures.
- 37 The drainage design for when the Proposed Development will be designed to ensure that there is no flooding from storm events up to and including the 100 year + 40% climate change event. Finished floor levels for buildings should be set at least 150mm above existing ground levels where possible. External levels should be designed such that any surface water flooding will flow away from the buildings
- 38 Various SuDS measures will be reviewed and considered as part of the design development stage, in order to understand the most appropriate measure to be implemented across the Proposed Development.
- 39 Consultation with Thames Water will also ensure that there is adequate capacity within their existing network.
- 40 It is concluded that the Proposed Development is unlikely to result in significant effects associated with flood risk and as such can be **SCOPED OUT** of the EIA. The EIA and planning application will be supported by Flood Risk Assessment and SuDS Report.

Comment 1: Water Resources, Drainage and Flood Risk Section 40 (Page 5) of the report concludes that Flood Risk has been scoped out of the EIA. However further consideration should be made to the following:

- It has been clarified in the Addendum that some basement development is now proposed.
- Historically the River Fleet was fed by tributaries from the Highgate and Hampstead ponds (see map below) the tributary from the Hampstead ponds ran through the area. The [Strategic Flood Risk Assessment \(SFRA\)](#) section 2.8.3 states that “The River Fleet became entirely enclosed in the 19th Century and is now fully incorporated into the TWUL (Thames Water) sewer network, eventually out-falling into the River Thames under Blackfriars Bridge”.
- The SFRA also provides a map of the culverted watercourses.
- It should be noted that [Camden’s Flood Risk Management Strategy states](#) in section 3.1.6 that “While the courses of the culverted rivers often correspond with levels of heightened flood risk, this is due to topography (rivers sit in low lying areas) rather than from the river itself.”
- It should also be noted that [Camden Planning Guidance on Water and Flooding](#) states that an assessment of flood risk is required for all basement development in “an area where historic watercourses are known to have been present.”
- The SFRA Figure 3iii shows surface water flood risk in the development area from the time of the publication of the SFRA. It also shows a previously flooded street in 2002. However

further investigation has determined that this is incorrectly identified. There is no evidence in the “Floods in Camden: Report of the Floods Scrutiny Panel” June 2003 into the 2002 floods that Weedington Road flooded except in Figure 1 which is the source of the mapping.

- Updated [Surface water flood risk maps](#) indicate a medium risk for parts of the development area.
- The development area is adjacent to the [Maitland Park Local Flood Risk Zone](#).
- The [S19 Flood Investigation Report into the July 2021](#) floods in Camden investigated flooding just to the west of the development area. A number of internal flooding reports were logged for Queens Crescent however these seem to all be due to leaks. There is no evidence to determine surface water flooding or sewer surcharge. The Section 19 Flood Investigation Report July 2021 considered a flooding hotspot just to the west of the development area. It indicated that the slope of the roads enabled the emergence of multiple surface water pathways. It did not consider the development area itself as there were no reports in the development area of internal flooding that we are aware of. However this is not to say there were not also surface water pathways through the development area which could be altered by redevelopment and internal flooding could occur to any new basement properties.

ACTION: The EIA should consider flood risk further and we would encourage the undertaking of detailed surface water modelling for the development area to fully inform the Flood Risk Assessment and Drainage Strategy.

This is from a Historic Rivers Map:



Comment 2:

In addition to the observations in the EIA scoping report, it is expected that due to the scale and location, at planning stage the applicant will submit:

- Flood Risk Assessment and Surface Water Drainage Statement
- Camden Flood Risk Pro-forma as well as the GLA SuDS Pro-forma
- Basement Impact Assessment - if appropriate
- Supporting documents including drawings detailing the proposed drainage, extent and position of SuDS, and flood risk mitigation measures, Microdrainage or equivalent runoff and volume calculations, lifetime maintenance plan for SuDS including management of related health and safety issues, drawing of overland flow routes showing no increased risk to the public and surrounding properties, evidence of site surveys and investigations relating to drainage, capacity confirmation from Thames Water or evidence of correspondence.

The proposals will be expected to meet the NPPF standards, national non-technical standards, London Plan policy and Camden policy and guidance for development in a surface water flood risk area. For example the designs should (include but not limited to):

- be designed to resist flooding and to cope with being flooded
- achieve greenfield run-off rates
- constrain run-off volumes to greenfield run off volumes for the 1 in 100 year 6 hour event
- include SuDS unless demonstrated to be inappropriate
- follow the drainage hierarchy in policy SI 13 of the London Plan

ACTION: Documents required

Air Quality

Comment 3: Air quality has been scoped in and states in Appendix A that “10 The Air Quality assessment will use the predicted future air quality conditions as a baseline from which to determine the effects of the completed and operational Proposed Development.” It should be noted that [CPG Air Quality](#) states clearly that “Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations).” **ACTION: CPG Air Quality should be followed and modelling should not predict improvements.**

Comment 4: Consideration should be given to how air quality is intended to be analysed (London Plan section 9.1.13). Given the lack of air quality monitoring in the proximity of the development we would encourage installation of air quality monitoring of NO₂ and particulate matter for at least 12 months to verify modelling and improve analysis. **ACTION: Local Air quality monitoring should be undertaken to verify modelling.**

Comment 5: Consideration should be made to the WHO Guideline values in place at the time of the publication of the London Plan 2021. For the assessment of impacts of a development on PM_{2.5} – the 2005 WHO guideline value of 10 µg/m³ should be used as the Air Quality Assessment Level, i.e. the impact descriptors (EPUK/IAQM) should be those relevant to 10 µg/m³. This means that a smaller contribution from a development to PM_{2.5} would be considered more severe than if the AQO of 25 µg/m³ were used. It should be noted that design features are preferable to energy intensive filtration systems where the guideline is exceeded. **ACTION: Consideration of WHO Guideline Values required.**

Comment 6: Due to the scale and location it is expected that that at planning stage the applicant will submit in line with Camden Planning Guidance and London Plan Guidance:

- A detailed Air Quality Assessment
- Air Quality Positive statement
- Camden Air Quality proforma

ACTION: Documents required

Energy and Sustainability

Comment 7: Full consideration should be made of the potential to connect to or create a low carbon district heating network. All sources of potential heat such as sewer source, ground source, waste heat source as well as air source heat pumps should be fully explored and considered. **ACTION: Heat network feasibility should be fully explored.**

Comment 8: Due to the scale and location it is expected that that at planning stage the applicant will submit in line with Camden Planning Guidance and London Plan guidance:

- An energy statement including a detailed feasibility assessment of low carbon heat sources and renewable energy and the GLA Carbon Emissions Reporting Spreadsheet
- A Sustainability statement including Dynamic Thermal Modelling
- A Whole Life Carbon Assessment including the GLA Whole Life Carbon Assessment template (it should be noted that condition and feasibility studies will also be required – to understand the potential of the existing buildings)
- A Circular Economy Statement including a demolition audit.
- Camden Energy and Sustainability Proforma

ACTION: Documents required

Links:

- [Air Quality Proforma](#)
- [Energy and Sustainability Proforma](#)
- [SuDS and Floods Proforma](#) and [GLA SuDS proforma](#)

The following CPG should be considered when completing the proforma:

- [CPG Energy Efficiency and Adaptation](#)
- [CPG Air Quality](#)
- [CPG Water and Flooding](#)

Kind regards

Katherine

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