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London Borough of Camden
Town Hall Judd Street
LONDON
WC1H 9JE

Our ref: NE/2022/135220/01
Your ref: 2022/5281/P
Date: 8 February 2023

Dear Laura,

West Kentish Town Estate Land bounded by Queens Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road, London NW5

Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works. AMENDMENT - EIA Scoping Addendum received.

Thank you for consulting us on the above EIA scoping opinion request, which we received on 2 December 2022.

Based on the information currently available, the development raises no environmental concerns within our planning remit. We therefore have no comments on the scope of the Environmental Statement.

Advice to LPA

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 167 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

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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:

- 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 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. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. 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.

All new residential developments 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. This is the standard set under [Camden Local Plan 2017](#) Policy CC3, and it is recommended the applicant adheres to the guidance in Camden's Planning Guidance – [Water and flooding 2019](#).

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

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. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

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

Yours sincerely,

Jamie Malone
Planning Advisor

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