

**Managing Flood Risk in Camden –**

**Sequential Test of the site allocations in the  
Camden Local Plan Proposed Submission Draft**

April 2025

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## Introduction

Local Planning Authorities are required to undertake a Strategic Flood Risk Assessment to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the cumulative impact that land use changes and development in the area will have on flood risk.

In plan-making, Local Planning Authorities are also required to take a sequential approach to the selection of site allocations, to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding.

To inform the development of the new Local Plan the Council has undertaken a Level 1 Strategic Flood Risk Assessment ([Level 1 Strategic Flood Risk Assessment \(camden.gov.uk\)](https://camden.gov.uk)).

This report uses the findings of the Level 1 Strategic Flood Risk Assessment for Camden and sets out the results of the sequential test of the proposed site allocations in the Camden Local Plan Proposed Submission Draft.

Given that Camden is in Flood Zone 1, the Exception Test is not required (see Table 2 (Flood Risk Vulnerability and Flood Zone 'Incompatibility') of the National Planning Practice Guidance on flood risk and coastal change and Annex 3 of the National Planning Policy Framework).

The Exception Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. There are two parts to the Exception Test, firstly that the proposed development would provide wider sustainability benefits to the community that outweigh flood risk, and secondly, that the development will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

## National Policy Context

The National Planning Policy Framework (NPPF) requires plans to take a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impacts of climate change.

Paragraph 174 of the NPPF states that "... the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test."

Annex 3 of the NPPF also sets out the Flood Risk Vulnerability Classification for different types of developments.

National Planning Practice Guidance (NPPG) for flood risk and coastal change provides guidance on how local authorities should take into account flood risk when preparing plans and sets out how the sequential test should be applied for plan preparation (see Diagram 2).

The NPPG advises that the Sequential Test needs to be applied to the whole local planning authority area to increase the possibilities of accommodating development, which is not exposed to flood risk, both now and in the future.

The NPPG states that, in applying the sequential test, “where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- Within medium risk areas; and
- Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas”.

([Flood risk and coastal change - GOV.UK](#) Paragraph 024 Ref ID: 7-024-20-20220825, Rev date 25/08/2022)

The guidance in the NPPF and the NPPG has been used to inform the approach we have taken to the sequential test of the site allocations, as set out below.

## **Local Policy Context**

Camden is classified as being in Flood Zone 1 (areas with a low probability of river or sea flooding), as there are no main rivers or coast within the borough. All main rivers historically located within Camden are now incorporated into the Thames Water sewer network. These are referred to as ‘lost’ or historic rivers and include the River Fleet, River Westbourne and River Tyburn.

Flooding from surface water and sewer surcharge pose the greatest risk to flooding in the borough, and the risk is interconnected due to the prevalence of the combined sewer system. Camden experienced significant flooding in 1975, 2002 and 2021, and the probability of such events recurring is likely to increase as a result of climate change. Camden also experiences some flooding from groundwater sources, particularly in areas to the north and the south of the borough.

The Council are in the process of preparing a new Local Plan for Camden. The Plan sets out the Council’s vision for future development in the borough over the next 15 years and includes the planning policies and site allocations to help achieve this.

To inform the preparation of the new Local Plan, the Council has updated the Strategic Flood Risk Assessment (SFRA) for the borough. This provides a clear picture of the potential risks associated with flooding in Camden and outlines the requirements with regard to ensuring that these risks are managed in a sustainable way into the future.

The Council is a Lead Local Flood Authority, which means it has responsibility for managing flood risk from surface water and groundwater in the borough. The draft new Local Plan sets out the Council’s proposed approach to managing flood risk in Camden to ensure that development in Camden does not increase flood risk and instead reduces

the risk of flooding where possible (Policy CC10 Flood Risk and Policy CC11 Sustainable Drainage).

Policy CC10 Flood Risk sets out where a Flood Risk Assessment will be required and provides guidance on what developers should consider as part of a Flood Risk Assessment for a site. For sites identified as being at risk from flooding, the Council will expect the Flood Risk Assessment to demonstrate that:

- the most vulnerable uses are located in areas at lowest risk of flooding within the site;
- the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- the development incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- any residual risk can be safely managed; and
- safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

In addition to this, where proposed site allocations are identified as being at risk of flooding, criteria have been included in the relevant site allocation policies requiring a Flood Risk Assessment to be carried out and submitted as part of the planning application process.

The approach to managing flood risk set out in the Proposed Submission Draft Local Plan has been informed by engagement with stakeholders, including the Environment Agency. Comments made as part of the consultation on the draft Local Plan have been considered when updating and finalising the Plan.

Further to this, a Sustainability Appraisal (SA) of the Local Plan has also been undertaken. The SA focusses on the likely environmental effects of the Local Plan whilst also considering a range of measures extending to social and economic impacts. As part of the consideration of the environmental impacts of the Plan, the flood risk associated with each of the proposed site allocations was identified. The SA identified no fundamental constraints at individual site level that would prevent sites from coming forward. It concluded that on all sites impacted by flood risk there was considered to be scope to avoid or significantly mitigate the impact through the policies in the Local Plan.

## **Approach to the Sequential Test**

The Local Plan Proposed Submission Draft includes 70 site allocations, including two sites which are allocated to help meet the need for Gypsy and Traveller accommodation in Camden. 34 of these sites already have planning permission and are therefore considered to be exempt from the sequential test. A list of the sites with planning permission is set out in Appendix 1 of this report. The remaining 36 sites have all been subject to the sequential test, the results of which are presented below.

To inform the application of the sequential test, the 36 sites have been subject to further investigation to establish:

- Any presence of a historic watercourse;

- Flood history;
- Percentage of the site at risk of flooding from surface water; and
- Susceptibility to groundwater flooding.

This process involved reviewing the Camden Strategic Flood Risk Assessment 2025 and the EAs 'Risk of flooding from surface water map'. ([See flood risk on a map - Check your long term flood risk - GOV.UK.](#)) The EA's mapping shows three modelled scenarios: low, medium and high. Where an area is not shown to flood from surface water, it is classified as very low risk. The risk categories are described below.

- 'Very low' risk means that each year this area has less than 0.1% chance of flooding;
- 'Low' risk means that each year this area has between 0.1% and 1% chance of flooding;
- 'Medium' risk means that each year this area has between 1% and 3.3% chance of flooding; and
- 'High' risk means that each year this area has greater than 3.3% chance of flooding.

The percentage of the site at risk of flooding was then estimated manually and recorded in the table of results set out below.

Following this, the sequential test was applied to the 36 site allocations that do not already have planning permission. As part of the assessment of sites the following factors were considered:

- Whether the development is in Flood Zone 1;
- Surface water flood risk;
- Vulnerability of existing and proposed land use, based on the NPPF Annex 3 Flood risk vulnerability classification; and
- Whether reasonable alternative sites are available.

The results of this assessment were then used to determine whether or not a site passed the sequential test. Given that Camden is in Flood Zone 1, the subsequent application of the Exception Test is not required.

## Application of the Sequential Test

This section sets out how the sequential test has been applied as part of the preparation of the Camden Local Plan Proposed Submission Draft.

### Sites with a low to medium chance of surface water flooding

Of the 36 sites assessed, 21 have been identified with a low to medium chance of surface water flooding. This is where 85% of the site or more is identified as being at either very low or low risk of surface water flooding, and under 10% of the site is identified as being at high risk of surface water flooding. These sites are considered to pass the requirements of the Sequential Test, given the location of the sites in Flood Zone 1 and the fact that no sequentially preferable sites are available that could deliver the levels of development identified, due to the limited availability of land in Camden. Furthermore it is considered that any flood risk can be mitigated through a Flood Risk Assessment as part of the planning application process. Given all the sites are in Flood Zone 1, the exceptions test does not apply.

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
S7	Parcelforce and ATS Tyre Site	St Pancras	1.53	280	Permanent self-contained homes and employment	More vulnerable (housing) / Less vulnerable (commercial)	75	14	3	8	Previously developed site. Within a Local Flood Risk Zone. Evidence suggests the historic River Fleet flowed through the site. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as	Yes, site is located in flood zone 1 and is considered to be at low - medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
											being at either very low or low risk of surface water flooding, with 11% of the site identified at medium/high risk of surface water flooding.	Flood Risk Assessment.
S8	St. Pancras Hospital	St Pancras	2.18	200	Health, self-contained homes, education and employment	More vulnerable (housing) / Less vulnerable (commercial)	60	30	5	5	Previously developed site. Within a Local Flood Risk Zone. Evidence suggests the historic River Fleet flowed close the site. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 10% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low – medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.



Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
S10	Eagle Wharf and Bangor Wharf	St Pancras	0.25	50	Employment, self-contained homes	More vulnerable (housing) / Less vulnerable (commercial)	75	17	3	5	Previously developed site. Adjacent to the Regent's Canal. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 8% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low - medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
S14	Land at Pakenham Street	King's Cross	0.44	70	Education and/ or employment uses and permanent self-contained homes	More vulnerable (housing) / Less vulnerable (commercial)	90	6	1	3	Previously developed site. Evidence suggests the historic River Fleet flowed through the site. The majority of the site is identified as being at either very low or low risk of surface water	Yes, site is located in flood zone 1 and is considered to be at low risk of flooding from all sources. It is considered

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
											flooding, with 4% of the site identified at medium/high risk of surface water flooding. Potential for groundwater flooding to occur at surface.	that the flood risk identified can be mitigated through a Flood Risk Assessment.
S20	York Way Depot and adjacent land at Freight Lane	King's Cross	1.05	210	Self-contained homes, employment, depot and bus operations/ parking facility and accommodation for gypsies and travellers	More vulnerable (housing) / Less vulnerable (commercial)	90	5	3	2	Previously developed site. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 5% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
S30	Birkbeck College	Bloomsbury	0.5	n/a	Higher education (academic and ancillary space)	More vulnerable	94	3	0	3	Previously developed site. The majority of the site is identified as being at either very low or low risk of	Yes, site is located in flood zone 1 and is considered to be at low risk

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
											surface water flooding, with 3% of the site identified at high risk of surface water flooding. Limited potential for ground water flooding.	of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
S31	Senate House	Bloomsbury	0.12	N/a	Higher education (academic and ancillary space)	More vulnerable	95	5	0	0	Previously developed site. The majority of the site is identified as being at either very low or low risk of surface water flooding. Limited potential for ground water flooding.	Yes, site is located in flood zone 1 and is considered to be at low risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
S32	20 Russell Square	Bloomsbury	0.07	n/a	Higher education (academic	More vulnerable	85	8	2	5	Previously developed site. The majority of the site is identified as	Yes, site is located in flood zone 1 and is

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
					and ancillary space)						being at either very low or low risk of surface water flooding, with 7% of the site identified at medium/high risk of surface water flooding. Limited potential for ground water flooding.	considered to be at low risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C4	Kentish Town Police Station	Kentish Town	0.45	35	Police facilities, self-contained homes and student accommodation.	More vulnerable (housing) / Less vulnerable (commercial)	90	5	1	4	Previously developed site. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 5% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
C6	Kentish Town Fire Station	Kentish Town	0.24	30	Fire station, self-contained homes and student accommodation.	More vulnerable (housing) / Less vulnerable (commercial)	97	2	1	0	Previously developed site. Located on a previously flooded street (1975). The majority of the site is identified as being at either very low or low risk of surface water flooding, with 1% of the site identified at medium risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C11	Network Rail Site Juniper Crescent	Camden Town	0.9	55	Self-contained homes, employment, operational railway use.	More vulnerable (housing) / Less vulnerable (commercial)	83	10	2	5	Previously developed site. Site is in the 41 – 60 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 7% of the site identified at	Yes, site is located in flood zone 1 and is considered to be at low – medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
											medium/high risk of surface water flooding.	through a Flood Risk Assessment.
C13	West Kentish Town Estate	Haverstock	3.5	569	Self-contained homes, small scale employment space and community uses	More vulnerable	80	10	6	4	Previously developed site. Evidence suggests the historic River Fleet flowed through part of the site. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 10% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low - medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C14	Hawkridge House	Haverstock	0.19	19	Student accommodation	More vulnerable	96	2	1	1	Previously developed site. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 2% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low risk of flooding from all sources. It is considered that the flood

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
												risk identified can be mitigated through a Flood Risk Assessment.
C16	Shirley House	Camden Town	0.18	197	Student accommodation	More vulnerable	80	7	10	3	Previously developed site. Adjacent to the Regent's Canal. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 13% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low - medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C19	Arlington Road	Camden Town	0.26	63	Employment, self-contained homes, student accommodation	More vulnerable (housing) / Less vulnerable (commercial)	93	5	1	1	Previously developed site. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority	Yes, site is located in flood zone 1 and is considered to be at low - medium risk of flooding

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
											of the site is identified as being at either very low or low risk of surface water flooding, with 2% of the site identified at medium/high risk of surface water flooding.	from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
W5	188-190 Iverson Road	West Hampstead	0.26	17	Offices, light industrial and self-contained homes	More vulnerable (housing) / Less vulnerable (commercial)	96	1	1	2	Previously developed site. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 3% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
W6	Land to the rear of Meridian House, 202-	Finchley Road / Swiss Cottage	0.35	15	Light industrial, offices and self-	More vulnerable (housing) / Less	99	1	0	0	Previously developed site. Located on a previously flooded street (2002).	Yes, site is located in flood zone 1 and is considered to



Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
	204 Finchley Road				contained homes	vulnerable (commercial)					Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Site identified as being at low / very low risk of surface water flooding.	be at low - medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
W7	Gondar Gardens Reservoir	Fortune Green	1.24	30	Self-contained homes and/or specialist care home	More vulnerable (housing)	100	0	0	0	Part of the site is previously developed. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Site identified as being at very low risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low - medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
W8	86-92 Kilburn High Road	Kilburn	0.22	21	Permanent self-contained homes and retail (or Class E).	More vulnerable (housing) / Less vulnerable (commercial)	70	30	0	0	Previously developed site. Located in a Local Flood Risk Zone. Located on a previously flooded street (1975). Site is in the 41 – 60 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at either very low or low risk of surface water flooding.	Yes, site is located in flood zone 1 and is considered to be at low – medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
N3	Queen Mary House	Hampstead	0.66	98	Self-contained homes	More vulnerable	100	0	0	0	Previously developed site. Located on a previously flooded street (2021). Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Site identified as being at very low	Yes, site is located in flood zone 1 and is considered to be at low - medium risk of flooding from all sources. It is considered that the flood risk identified

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (homes / student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood risk commentary	Sequential test passed
							Very Low	Low	Medium	High		
											risk of surface water flooding. Limited potential for ground water flooding.	can be mitigated through a Flood Risk Assessment.
N4	Hampstead Delivery Office	Hampstead	0.4	45	Self-contained homes	More vulnerable	100	0	0	0	Previously developed site. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Site identified as being at very low risk of surface water flooding. Limited potential for ground water flooding.	Yes, site is located in flood zone 1 and is considered to be at low - medium risk of flooding from all sources. It is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.

## Sites with a medium to high chance of surface water flooding

Of the 36 sites assessed, 15 sites have been identified with a medium to high chance of surface water flooding. This is where over 15% of the site is identified as being at either medium or high risk of surface water flooding. These sites are considered to pass the requirements of the Sequential Test, due to the location of the sites in flood zone 1 and the fact that no sequentially preferable sites are available that could deliver the levels of development identified, due to the limited availability of land in Camden. Furthermore, it is considered that any flood risk can be mitigated through a Flood Risk Assessment as part of the planning application process. Given all the sites are in Flood Zone 1, the exceptions test does not apply.

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
S5	120-136 Camley Street	King's Cross	0.5	110	Employment	More vulnerable (housing) / Less vulnerable (commercial)	5	82	3	10	Previously developed site. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 13% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
S6	104-114 Camley Street	King's Cross	2.5	750	Self-contained homes and employment	More vulnerable (housing) / Less vulnerable (commercial)	20	45	25	10	Previously developed site. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 35% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
S9	Shorebase Access Site	St Pancras	0.19	41	Self-contained homes, student housing, offices	More vulnerable	20	40	15	25	Previously developed site. Located in a Local Flood Risk Zone. Evidence suggests the historic River Fleet flowed close to the site. The majority of the site is	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore,

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
											identified as being at either very low or low risk of surface water flooding, with 40% of the site identified at medium/high risk of surface water flooding.	it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
S13	Thameslink Station	King's Cross	0.06	12	Employment and permanent self-contained homes	More vulnerable (housing) / Less vulnerable (commercial)	0	40	0	60	Previously developed site. Located in a Local Flood Risk Zone. 60% of the site is identified at high risk of surface water flooding.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
S18	135-149 Shaftesbury Avenue	Holborn	0.08	n/a	Theatre, cinema, cultural use	Less vulnerable	0	2	1	97	Previously developed site, occupied by a building that will likely be retained and re-used. The majority of the site is identified as being at high risk of surface water flooding. Potential for groundwater flooding of property situated below ground level and potential for groundwater flooding to occur at surface.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
S19	Holborn Library and Cockpit Yard	Holborn	0.4	73	Employment, self-contained homes, library and depot	More vulnerable (housing) / Less vulnerable (commercial)	25	50	15	10	Previously developed site. The majority of the site is identified as being at either very low or low risk of surface water flooding,	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
											with 25% of the site identified at medium/high risk of surface water flooding. Potential for groundwater flooding of property situated below ground level.	with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C2	Regis Road Growth Area	Kentish Town	9	1,000	Industry / employment; housing; community uses; open space; waste and recycling facilities; and depot facilities	More vulnerable (housing) / Less vulnerable (commercial)	60	20	10	10	Previously developed site. Evidence suggests the historic River Fleet flowed through the site. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 20% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a



Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
												Flood Risk Assessment.
C3	Murphy Site	Kentish Town	6.6	750	Industry / employment; self-contained homes and student accommodation; community uses; open space	More vulnerable (housing) / Less vulnerable (commercial)	40	35	15	10	Previously developed site. Evidence suggests the historic River Fleet flowed through the site. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 25% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C10	Juniper Crescent	Camden Town	1.4	375	Self-contained homes, small-scale employment space and community uses.	More vulnerable (housing) / Less vulnerable (commercial)	80	5	3	12	Previously developed site. Site is in the 41 – 60 category for sewer flooding incidents in this postcode area between 2013 – 2023.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
											The majority of the site is identified as being at either very low or low risk of surface water flooding, with 15% of the site identified at medium/high risk of surface water flooding.	flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C12	Gilbeys Yard	Camden Town	0.8	120	Self-contained homes, community use, small-scale employment space.	More vulnerable (housing) / Less vulnerable (commercial)	70	15	7	8	Previously developed site, next to the Regent's Canal. Site is in the 41 – 60 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 15% of the site identified at	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
											medium/high risk of surface water flooding.	
C15	Wendling & St Stephens Estate	Gospel Oak	2.3	509	Self-contained homes, health and community facilities	More vulnerable	70	10	5	15	Previously developed site. Located in a Local Flood Risk Zone and next to a previously flooded street. Site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 20% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C17	Camden Town Over	Camden Town	0.5	58	Self-contained homes, student accommodation,	More vulnerable (housing) /	10	40	30	20	Previously developed site.	Yes, site is located in flood zone 1

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
	Station Development				employment uses, retail and food and drink uses (ground level)	Less vulnerable (commercial)					Located on a previously flooded street (2022). Half the site is identified at medium to high risk of surface water flooding.	and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C18	UCL Camden Campus	Kentish Town	1.52	180	Student accommodation	More vulnerable	75	10	5	10	Previously developed site. The majority of the site is identified as being at either very low or low risk of surface water flooding, with 15% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
												flood risk identified can be mitigated through a Flood Risk Assessment.
C22	Heybridge Garages, Hadley Street	Camden Town	0.11	10	Housing	More vulnerable	1	84	5	10	Previously developed site. Site is in the 41 – 60 category for sewer flooding incidents in this postcode area between 2013 – 2023. The majority of the site is identified as being at low risk of surface water flooding, with 15% of the site identified at medium/high risk of surface water flooding.	Yes, site is located in flood zone 1 and the level of flood risk vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.
C27	Land adjacent to Constable House	Haverstock	0.046	2 pitches	Gypsy and Traveller accommodation	More vulnerable (housing)	25	40	5	30	Previously developed site. Located on a previously	Yes, site is located in flood zone 1 and the level of flood risk

Site Ref	Site Name	Location	Site Area (Ha)	Site Capacity (Homes/ student housing)	Proposed Uses	NPPG vulnerability of proposed land use	% of the site at risk of surface water flooding				Flood Risk Commentary	Sequential Test passed
							Very Low	Low	Medium	High		
											flooded street (2002). The majority of the site is identified as being at low risk of surface water flooding, with 35% of the site identified at medium/high risk of surface water flooding.	vulnerability is considered compatible with the flood zone. Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment.

## **Summary and conclusions**

Managing flood risk has been a key consideration in the preparation of the Camden Local Plan. 36 sites were considered through the sequential test, of which 21 sites were considered to have a low to medium chance of flooding and 15 sites were considered to have a medium to high chance of surface water flooding. All sites are in Flood Zone 1 and considered to pass the sequential test as the land use proposed is compatible with the flood zone, and no sequentially preferable sites are available, given the limited availability of land in Camden.

Where sites have been identified as being at risk of flooding then measures to mitigate the flood risk on those sites have been incorporated into the relevant site allocation policies. Flood Risk Assessments will also be required for sites of 1 hectare or greater, and where a flood risk (from any source) has been identified on the site.

## Appendix 1 – Site Allocations with Planning Permission

Site Name	Site Reference	Planning Reference	App Type	Decision
Former Royal National Throat Nose and Ear Hospital	S11	2020/5593/P	Full Planning Permission	Approved 20/07/2022
Belgrove House	S12	2020/3881/P	Full Planning Permission	Approved 01/11/2021
Land to the rear of the British Library	S15	2022/1041/P	Full Planning Permission	Approved 17/07/2024
Former Central St Martins	S16	2020/2470/P	Full Planning Permission	Approved 30/10/2020
Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street	S17	2023/2510/P	Full Planning Permission	Approved 07/03/2024
Agar Grove Estate	S21	2013/8088/P	Council's own permission Reg 3	Approved 04/08/2014
		2019/4280/P	Variation of condition	Approved 13/10/2020
		2022/2359/P	Variation of condition	Approved 20/12/2022
6 St Pancras Way	S22	2021/2671/P	Full Planning Permission	Approved 07/11/2022
Tybalds Estate (infill)	S23	2021/3580/P	Council's own permission Reg 3	Approved 14/10/2022
294-295 High Holborn	S24	2017/1827/P	Full Planning Permission	Approved 15/08/2018
		2020/2937/P	Non-material Amendment	Approved 25/11/2020



156-164 Grays Inn Road / Panther House	S25	2015/6955/P	Full Planning Permission	Approved 01/11/2017
		2021/1056/P	Variation of condition	Approved 30/03/2022
		2021/1918/P	Non-material Amendment	Approved 07/07/2021
		2022/5584/P	Variation of condition	Approved 20/12/2023
8 – 10 Southampton Row	S26	2019/2536/P	Full Planning Permission	Approved 09/07/2020
		2019/2560/L	Listed Building Consent	Approved 09/07/2020
Middlesex Hospital Annex 44 Cleveland Street	S27	2017/0414/P	Full Planning Permission	Approved 15/01/2018
Central Somers Town	S28	2015/2704/P	Full Planning Permission	Approved 14/10/2016
		2019/5882/P	Variation of condition	Approved 01/07/2020
		2023/3830/P	Non-material Amendment	Approved 21/11/2023
Godwin and Crowndale Estate	S29	2020/3801/P	Full Planning Permission	Approved 14/05/2021
Kentish Town Road Car Wash Site	C5	2019/0910/P	Full Planning Permission	Approved 12/03/2020
Morrisons Supermarket	C7	2017/3847/P	Full Planning Permission	Approved 18/07/2018
		2020/0034/P	Variation of condition	Approved 05/05/2020
		2020/3116/P	Variation of condition	Approved 07/12/2020
Morrisons Petrol Filling Station	C8	2022/3646/P	Variation of condition	Approved 29/03/2023

100 Chalk Farm Road	C9	2024/0479/P	Full planning permission	Approved 11/09/2024
Highgate Centre 19-37 Highgate Road and A&A storage 19 Greenwood Place	C20	2013/5947/P	Full Planning Permission	Approved 18/06/2014
		2022/1603/P	Variation of condition	Approved 02/03/2023
Grand Union House, 18-20 Kentish Town Road London NW1	C21	2021/0911/P	Full Planning Permission	Approved 16/12/2021
Bacton Low Rise	C23	2020/1019/P	Non-material Amendment	Approved 31/03/2020
52 - 54 Avenue Road	C24	2022/1863/P	Full Planning Permission	Approved 11/05/2023
5-17 Haverstock Hill	C25	2016/3975/P	Full Planning Permission	Approved 02/10/2018
160 Malden Road	C26	2024/1193/P	Full Planning Permission	Approved 14/11/2024
O2 Centre, carpark and car showroom sites	W2	2022/0528/P	Outline Planning Permission	Approved 20/12/2023
11 Blackburn Road	W3	2015/3148/P	Full Planning Permission	Approved 05/05/2017
13 Blackburn Road	W4	2020/2940/P	Full Planning Permission	Approved 04/05/2023
Land at Midland Crescent	W9	2014/5527/P	Full Planning Permission	Approved 25/03/2015
		2018/0702/P	Non-material Amendment	Approved 19/02/2018
BP Petrol Station, 104A Finchley Road	W10	2022/3553/P	Full Planning Permission	Approved 11/07/2024
Abbey Co-Op Housing Site, Casterbridge	W11	2013/4678/P	Council's own permission Reg 4	Approved 16/05/2014

and Snowman House		2017/2523/P	Variation of condition	Approved 12/04/2018
100 Avenue Road	W12	2014/1617/P	Full Planning Permission	Allowed at Appeal 19/02/2026
551-557 Finchley Road	W13	2020/5444/P	Full Planning Permission	Approved 24/12/2021
317 Finchley Road	W14	2016/2910/P	Full Planning Permission	Approved 07/03/2017
Mansfield Bowling Club	N2	2015/1444/P	Full Planning Permission	Allowed at Appeal 27/01/2017
		2018/1701/P	Variation of condition	Approved 12/04/2019
		2022/5320/P	Full Planning Permission	To be determined