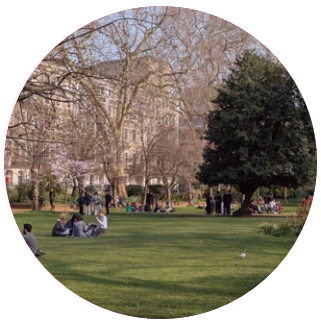
11

The Natural Environment

11 Chapter



The natural environment

11.1 Recent years have shown the important role that access to open space and nature can play in improving physical and mental health, well-being and happiness.

11.2 There is also greater emphasis now on the role that trees, plants and greenery can play in keeping our air clean, reducing surface water flooding, cooling our neighbourhoods, enhancing biodiversity and helping to tackle the climate and ecological emergency.

11.3 Camden benefits from a rich and diverse natural environment and has a wide range of open spaces including parks, natural or semi-natural green spaces, housing estate amenity areas, playgrounds, historic cemeteries, churchyards, allotments, community gardens, outdoor sports facilities and the Regent's Canal. These spaces, together with street trees, soft landscaping, roof gardens, rain gardens and green/brown roofs and walls form a network of 'green infrastructure' in the borough.

11.4 The Council's biodiversity strategy 'Creating Space for Nature in Camden' sets out our ambitions for protecting and enhancing nature and biodiversity in the borough. It aims to ensure that Camden is a place where nature and wildlife can thrive and where residents, visitors and workers have the opportunity to access and enjoy nature. It is the first part of an ecological plan for the borough, developed in response to the declaration of a climate and ecological emergency by the Council, and will be supported by the establishment of a Local Nature Recovery Network and the development of a Green Infrastructure Strategy.

Policy NE1
The Natural Environment

A. To conserve and enhance Camden's natural environment the Council will:

1. protect and enhance the network of open spaces and local green spaces across the borough in accordance with Policy SC4 (Open Space);
2. give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);
3. designate and protect nature conservation sites (including the Ancient Woodland on Hampstead Heath) and other features of biodiversity value, such as Sites of Importance for Nature Conservation, corridors, stepping-stones and ancient and veteran trees in accordance with NE2 (Biodiversity) and NE3 (Tree Planting and Protection);
4. support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;
5. protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;
6. preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath;
7. work with partners to preserve and enhance the Regent's Canal, including its setting, and improve access to its towpath, while balancing the differing demands on them;
8. expect development to protect and enhance biodiversity in line with Policy NE2 (Biodiversity);
9. protect trees in Camden and seek to secure additional trees in accordance with Policy NE3 (Tree Planting and Protection);
10. seek contributions from any scheme proposing additional housing and all major developments to safeguard and enhance designated wildlife sites and, where appropriate, help facilitate the delivery of green links ('corridors') between them, or improve buffers around sites, to offset the impacts of development and provide opportunities to enjoy nature;
11. encourage the delivery of highways greening measures in accordance with Policy T1 (Safe, Healthy and Sustainable Transport);
12. require multi-functional Sustainable Drainage Systems (SuDs) to be provided to reduce surface water run off as far as possible in accordance with Policy CC11 (Sustainable Drainage);
13. seek to improve opportunities for residents and the public to access and engage with nature, particularly in areas where such opportunities are lacking; and
14. seek contributions from the development of appropriate sites to support the delivery of the Council's priorities and projects for the natural environment, commensurate with the scale and impact.

11.5 Policy NE1 supports the Council's ambitions for creating space for nature in Camden by ensuring that development in Camden conserves and enhances Camden's natural environment, in response to the climate and ecological emergency. This policy should be read in conjunction with Policies SC4 (Open Space); SC5 (Food Growing); NE2 (Biodiversity); NE3 (Tree Planting and Protection); D1 (Achieving Design excellence); CC1 (Responding to Climate Change); CC11 (Sustainable Drainage) and T1 (Safe, Healthy and Sustainable Transport), which together set out the Council's approach to the Natural Environment.

Metropolitan open land and sites of nature conservation importance

11.6 Camden has a number of designated open spaces, which are identified on the Local Plan Policies Map. These open spaces include areas of Metropolitan Open Land (MOL), which is open space of London-wide significance that provides a break in the built-up area. There are four main areas of MOL in Camden, which are of great importance to the borough and its character – Hampstead Heath and adjoining areas, Regent's Park, Primrose Hill/Barrow Hill Reservoir and Highgate Cemetery/Waterlow Park/ Fairseat. We will protect the openness and character of these spaces in accordance with London Plan policy and policy guidance in the National Planning Policy Framework (NPPF) on Green Belts.

11.7 A significant number of open spaces in Camden are also designated for their nature conservation importance. Designated sites of nature conservation interest are shown on the Local Plan Policies Map. Taken together, these sites occupy some 414 hectares of land. They are:

- Hampstead Heath Woods Site of Special Scientific Interest (SSSI), which is Camden's only SSSI. SSSIs are designated by Natural England due to their nationally important habitats and species and/or geological features and must be given the highest protection in accordance with legislation;
- 39 Sites of Importance for Nature Conservation (SINC): As part of the evidence base for the Local Plan, Camden commissioned the London Wildlife Trust to undertake a review of these sites. This resulted in a number of boundary changes and the identification of 3 new SINCs which are reflected on the Policies Map;
- 4 statutorily designated Local Nature Reserves (LNR), which host a rich variety of flora and fauna – Adelaide, Belsize Woods, Westbere Copse (all managed by London Borough of Camden) and Camley Street Natural Park (managed by London Wildlife Trust);
- The Regent's Canal, which passes through the borough. It provides a flyway for bat populations and is therefore sensitive in parts to light pollution.

11.8 Camden's SINCs and LNRs represent some of the most significant concentrations of habitat and species in the borough. They are widely distributed, have varied functions (including rail embankments, London Squares, community gardens and burial grounds) and have an essential role in providing local access to nature. Most SINCs are not in the Council's control and therefore it is difficult for the Council to protect species, habitats and foraging areas which are not formally protected by international and national legislation. We will, however, seek to protect these locally designated nature conservation sites from inappropriate and harmful development. This includes resisting the development of designated sites where the nature conservation value has been diminished or lost through neglect or damage as it is possible for the habitat to be restored.

11.9 This policy, in tandem with Policy SC4 (Open Space) and Policy NE2 (Biodiversity), ensures the safeguarding of these sites.

Local green spaces

11.10 The NPPF introduced the concept of a Local Green Spaces designation. This is green space where development is ruled out other than in very special circumstances. A Local Green Space should be within reasonably close proximity to the community it serves, be demonstrably special to a local community and hold particular local significance, be local in character and not form an extensive tract of land. The Local Plan seeks to protect existing local green spaces, and the Council supports Neighbourhood Forums in identifying further local green spaces through neighbourhood plans. Inappropriate development of designated Local Green Spaces will not be supported except in the very special circumstances set out in national planning policy.

Protection of other undeveloped areas including gardens

11.11 Development within gardens and other undeveloped areas can have a significant impact upon the amenity and character of the local area and may increase local flood and heat risk, particularly in tandem with other developments. The Council will therefore protect such spaces in accordance with the National Planning Policy Framework.

11.12 Gardens help shape their local area, provide a setting for buildings, provide visual interest and often support natural habitats. Therefore, they can be an important element of the character and identity of an area (its 'sense of place') and its biodiversity. Given this, notwithstanding permitted development rights, we will continue to resist development that occupies a disproportionate amount of a garden, and the loss of garden space which contributes to the character of the townscape.

11.13 The impact of development on gardens, especially biodiversity and drainage, can be reduced through having fewer or smaller garden structures, the use of lightweight building materials and by retaining areas of topsoil. Some neighbourhood plans in Camden have also identified existing and proposed wildlife corridors that cross gardens, which those plans seek to protect and enhance.

11.14 Part of the established character of garden spaces may also be defined through features such as railings and garden walls. We will generally seek the retention of these features where they make a positive contribution to townscape value, recognising however that solid walls and fences can act as a barrier for some species, such as hedgehogs. We will also support the reinstatement of permeable garden borders, such as hedges, where this helps the movement of species (see Policy NE2 (Biodiversity).

11.15 Wider Local Plan policies relating to car free development (Policy T5 (Parking and Car-free Development) and the retention of permeable surfaces (Policy CC11 (Sustainable Drainage) are likely to also bring benefits for biodiversity through the retention of soft landscaping and planting.

11.16 Furthermore, to enhance the amenity of residents and occupants we will also seek the retention of important views and glimpses of green space where these have been identified in a conservation area appraisal or development plan document (particularly where schemes are unable to meet the requirement to provide public open space on-site). Spaces above rooflines, gaps between buildings, and even small, sometimes isolated pockets of amenity space, can be vital in supporting openness, providing visual interest, softening the built environment and contributing to well-being. These views may also help to define the significance of heritage assets.

Key open spaces in Camden

11.17 Hampstead Heath is the largest open space in the borough, providing nearly half of Camden's total area of open space and many of its outdoor sporting facilities. The Council will work with partners, including the City of London (who own and manage the Heath), to ensure it is properly safeguarded. There are numerous large private gardens adjacent to the Heath that are designated as open space. We will continue using guidance in conservation area appraisals and management strategies to preserve and enhance the built environment around the Heath and preserve outlooks and views from it. This includes protected views from Kenwood House and Parliament Hill to St. Paul's and from Parliament Hill to the Palace of Westminster.

11.18 The Regent's Canal is Camden's only significant open watercourse and winds through the borough from Regent's Park to King's Cross. The Canal is designated as a site of metropolitan importance for nature conservation and is also an important historical feature. Development near the Canal will therefore be expected to reflect its unique character. When assessing applications for sites along and adjacent to the Canal we will take into account the Regent's Canal Conservation Area Appraisal and Management Strategy.

11.19 We will also work with partners to enhance the Canal and balance the differing demands on the Canal and its towpath. Key considerations here are improving the accessibility of the Canal and also improving biodiversity along the Canal through planting and the provision of green or brown roofs and green walls. Other issues relevant to development proposals in proximity of the Canal include the increasing demands on the towpath by pedestrians and cyclists, the potential for crime and anti-social behaviour due to the Canal's relative isolation, and the importance of retaining dark, unlit land in sustaining habitats and species, particularly the foraging of bats.

11.20 Where developments are proposed in proximity to the Regent's Canal, the Canal and River Trust should be consulted at an early stage in the planning application process.

Increasing opportunities to experience nature

11.21 A key objective of the Council's Biodiversity Strategy is to increase engagement with nature. There are typically lower levels of active engagement in more deprived areas of the borough. This is partly related to the limited amount of natural habitat in these locations, where nature conservation sites are generally quite small, with parts of the west, east and south of the borough having the lowest coverage. In some cases, access to nature conservation sites is restricted in order to safeguard their nature conservation interest.

11.22 Of particular social benefit to the borough are Local Nature Reserves. They support a variety of learning and community-based activity, and it is important to protect and maximise their value. By raising awareness of our links to, and dependence on, the environment, these sites can foster an interest in the stewardship of natural habitats.

Enhancing our natural environment

11.23 Development schemes will be expected to contribute to the delivery of local green infrastructure projects, to enhance the borough's natural environment, commensurate with their scale and impact. This includes enhancements to existing and the provision of new green infrastructure, in accordance with the policies in the Plan, particularly those relating to open space, biodiversity, trees, highways and design. The Local Plan also supports initiatives for the greening of the public realm to create safer, healthier, more attractive environments for residents, workers and visitors.

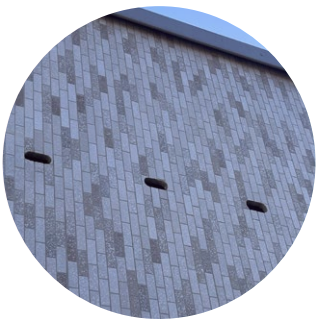
11.24 As part of this, the Council will look to secure contributions to enhance links between open spaces, including wildlife sites, in the borough, to improve access for recreation where this is consistent with conservation objectives, to allow species to move between habitats.

11.25 Key strategic green links proposed in Camden include the Camden Nature Corridor in Kentish Town, the Camden Green Network, which seeks to connect green spaces across the borough, and the Camden Highline which is intended to run from King's Cross to Camden Town. Further information on these proposals, and other green infrastructure projects, is set out in the Council's Infrastructure Delivery Plan and will be identified in emerging documents relating to Camden's Green Infrastructure and Nature Recovery networks. The Council will secure planning obligations from schemes, where appropriate, to help facilitate the delivery of green links or provide or improve buffers around sites. 'Linking' green infrastructure such as corridors can help to improve the function of designated sites. There are also opportunities to repair and improve SINCs to enhance their biodiversity and where they are open to the public, ensure that the impacts of additional visits are not detrimental to a site's ecology.

11.26 To support the objectives set out in the Biodiversity Strategy, the Council has adopted a Tree Planting Strategy and as mentioned, is in the process of preparing a Local Nature Recovery Strategy and Green Infrastructure Strategy. These documents will set out key priorities for the borough and include projects to help deliver these. Development in Camden will be expected to support the delivery of these strategies once they are adopted.

11.27 Further guidance on the provision of open space and trees is set out in the Council's Camden Planning Guidance and developers will be expected to have due regard to this.





Biodiversity

11.28 Nature provides us with a variety of environmental, social, cultural, educational, health and recreational benefits.

11.29 However, in recent times it has become increasingly apparent that biodiversity in the UK is declining. Given this, the Council declared an ecological and climate emergency in 2019 with the aim of protecting and supporting habitats and species in Camden to reverse their decline.

11.30 The Environment Act 2021 introduced a requirement for developments to deliver a minimum 10% biodiversity net gain above the ecological baseline for an application site. In Camden, roof gardens, green and blue roofs and sustainable drainage systems will in many cases have particular potential for delivering net gains in biodiversity on site, while offering additional benefits for residents such as cooling and flood risk reduction. Further information on the Council's requirements for addressing drainage as part of the development is set out in Policy CC11 (Sustainable Drainage).

11.31 The Environment Act also introduced Local Nature Recovery Strategies which will guide the delivery of biodiversity net gain projects. The Council's emerging Nature Recovery Network (a network of designated and non-designated wildlife sites and corridors for wildlife) and Neighbourhood Plans map the opportunities where routes for wildlife can be improved, or buffers provided, for designated sites through extending biodiverse planting and landscaping. Strengthening corridors reduces the risk of the borough's designated sites for biodiversity becoming isolated and deteriorating over time.

11.32 The implementation of these initiatives will contribute towards the delivery of net gains in biodiversity, so that the natural environment across Camden is improved by the end of the Local Plan period. Financial contributions sought under Policy SC4 (Open Space) will also be used to contribute towards new planting and measures to support wildlife.

Policy NE2
Biodiversity

A. The Council will seek to ensure that development protects and enhances nature conservation and biodiversity in the borough. The Council will:

1. require all major schemes, and those that have the potential to adversely impact biodiversity and designated sites, to prepare a baseline ecological assessment (Biodiversity survey and report). This should demonstrate how any adverse impacts on biodiversity can be avoided or mitigated and establish how biodiversity enhancements will be maximised. Mitigation measures should be delivered on-site unless it can be demonstrated to the Council's satisfaction that this is not achievable;

2. consider any potential adverse impacts of a development on habitats and species from factors such as shading, light pollution and risk of disturbance. Applicants will be expected to follow the mitigation hierarchy with regards to the management of such impacts (avoiding where possible; where this is not feasible, seeking to mitigate the impact; and only where avoidance and mitigation are not possible, seeking compensation for the loss/harm);

3. resist development where it is likely to worsen deficiencies in access to natural greenspace;

4. expect development to realise benefits for biodiversity through their layout, design and use of materials, taking into account the local ecological context and any opportunities for biodiversity gains identified in Local Plan site allocations and neighbourhood plans, including the provision of green roofs;

5. expect suitable developments to integrate measures to support wildlife, including swift bricks, bat/bird boxes, bee bricks and permeable fencing;

6. require a biodiversity net gain of at least 10% on eligible sites, with preference given for on-site or near site solutions. The net gains will be secured for a period of at least 30 years;

7. recognise the biodiversity value offered by gardens and soft landscaping, in contributing to wildlife corridors and providing a 'stepping stone' between designated nature conservation sites, avoiding detrimental impacts on the function of an existing/emerging corridor; and

8. secure long-term management plans and monitoring of schemes, where appropriate, to ensure that nature conservation objectives are met. We will also expect Construction Management Plans to provide information on how habitats will be protected during building work, where appropriate.

11.33 Under the provisions of the Environment Act 2021, local authorities have the duty to conserve and enhance biodiversity and report on actions taken. The Council's Biodiversity Strategy sets out our ambitions for protecting and enhancing nature and biodiversity in the borough and the Local Plan provides the framework through which the Council can deliver this.

Habitats and species

11.34 Camden's green spaces and built environment support habitats and species protected under UK and international legislation, the presence of which is a material planning consideration. Priority habitats and species are those most threatened and in need of conservation action in the UK and will be afforded protection when assessing planning applications.

11.35 There are also Sites of Importance for Nature Conservation in Camden which are graded into four categories according to their spatial significance and quality. The Council has undertaken a review of the role and function of designated SINCs in the borough (Review of Sites of Nature Conservation, London Wildlife Trust, 2024) which found that the vast majority of Camden's SINCs continue to meet the criteria for which they were originally designated.

11.36 Additionally, we have designated Local Nature Reserves providing opportunities for communities to access and engage with nature and wildlife corridors of various scales. Areas of non-designated habitat may also be important in providing space for wildlife to shelter, find food and move through the landscape.

Protecting biodiversity

11.37 The Council will require all major schemes, and those that have the potential to impact biodiversity and designated sites, to prepare a baseline ecological assessment, which should establish the site's ecological characteristics, assess the proposal's impacts on existing trees, shrubs and vegetation and identify opportunities for mitigation and enhancement. As part of this, consideration should be given to the presence of habitats and species in proximity to the site and whether the site has a 'buffering' role (that is, managing disturbance from human activity on an identified habitat). The Council will expect developments to demonstrate how habitats providing multiple functions (for example, flower-rich grassland in public open space) can be maintained in a way that optimises their environmental benefits. Survey findings should be shared in an appropriate format with Greenspace Information for Greater London (GIGL), London's environmental records centre. Further guidance on ecological assessments, including the level and scope of detail required, and the times in which they should be carried out, is set out in Camden Planning Guidance on Biodiversity and developers will be expected to have due regard to this.

11.38 Where development is proposed that will indirectly impact on biodiversity through noise, light, shading, inappropriate planting and increased human presence, the Council will require developers to demonstrate how any adverse impacts on biodiversity can be avoided or mitigated. External lighting provided in the grounds of domestic properties solely for a design benefit (for example uplighters in trees) should generally be avoided and an appropriate colour temperature used for the location. Schemes will also be resisted where there would be a detrimental impact on the local community's ability to enjoy access to nature. Lighting should be sensitive to the context of the Regent's Canal, which has long supported the movement of bats.

Enhancing biodiversity

11.39 Developers of new homes and other major developments will be expected to demonstrate that biodiversity has been fully integrated into the design and development of their scheme from an early stage. For many years, local planning policies have successfully secured green roofs and species features, such as bird and bat boxes, helping to boost local biodiversity. Given this the Council will seek biodiversity enhancements, commensurate with the size of a scheme, with priority given to delivering these on-site.

11.40 The layout and type of habitats provided should take into account the site's role in providing a buffer for, and connections to, nature sites and wildlife corridors. As a benchmark, 50% of total planting should be native species and 50% species of recognised value to biodiversity, such as those on the Royal Horticultural Society's 'Plants for Pollinators' list.

11.41 Local sites alone are insufficient to sustain a thriving local ecosystem. The Camden Biodiversity Strategy highlights the essential need for wildlife to be able to move between areas to find food, shelter and a mate. The Strategy emphasises the need to develop, improve and expand networks of corridors and 'stepping stones' to facilitate this, which will also help to provide greater resilience for wildlife to respond to extreme weather events. Neighbourhood forums and other residents' groups have already been active in investigating what opportunities exist for improving networks in their areas and maps are set out in some adopted neighbourhood plans showing existing and proposed corridors. Wildlife corridors may in some cases also provide wider health and well-being benefits for residents, by extending access to, and experience, of nature (in local green spaces and private gardens).

11.42 At both the London wide and borough level, Nature Recovery Networks are being developed through engagement with partners. These will provide a basis for making informed decisions on what to do for nature and help to prioritise where this is likely to have the greatest benefit. We do, however, recognise that smaller scale connections to this network will also be needed to bring nature to all parts of Camden.

11.43 The Local Plan's site allocations identify opportunities for biodiversity enhancement on certain key sites. The clustering of major development sites at Kentish Town and Gospel Oak and their proximity to Hampstead Heath and local rail sides could deliver substantial benefit through better connectivity and the buffering and expansion of existing habitats. Key green infrastructure projects identified in the Local Plan include the Camden Highline (running alongside the north London railway line between Camden Town and King's Cross), the Camden Nature Corridor (linking sites in Kentish Town with Hampstead Heath) and the Camden Green Link (encompassing the Bloomsbury Green Corridor, linking Hampstead Heath to the southern borough boundary). The Council's emerging Green Infrastructure Strategy is likely to identify further routes as part of a boroughwide approach to delivering a greener and healthier environment. This strategy is also likely to reflect elements of the developing Nature Recovery Network.

Biodiversity net gain

11.44 The government introduced 'Biodiversity Net Gain' as a national scheme in England in 2024. It is based on a 'metric-driven' approach and is a mandatory requirement, meaning it is therefore not principally driven by planning policy. central to its operation is the idea of relative change; that is, the difference between the value of habitats on-site prior to development and the value of the habitats on-site (or off-site) after development has been completed. Biodiversity Net Gain (BNG), as set out in the Environment Act, requires developments that fall within the legislation to provide a minimum 10% net gain in biodiversity. Where a developer is required to provide net gains, the Council's preference is for these to be provided on or near the development site.

11.45 The delivery of BNG will vary depending on the site. For example, it is possible that on some larger sites BNG will not apply because there is either zero or minimal existing habitat, while other sites may have potential to deliver gains significantly above the 10% threshold given their proximity to designated wildlife sites. Given this, the Council will seek to negotiate enhancements commensurate with the scale and opportunities provided by an individual development scheme/site. The Local Plan's site allocations identify where there are particular opportunities to create and enhance habitat. Existing tools, such as the London Plan's Urban Greening Factors, will also help to deliver biodiversity gains in the borough.

11.46 Where sites fall within 10 metres of the Regent's Canal, the canal may have a role in the delivery of off-site biodiversity net gains and early engagement with the Canal and River Trust should be sought.

Integrating biodiversity into buildings

11.47 Given the limited availability of land in Camden, one of the main opportunities available for enhancing biodiversity is through the innovative integration of habitats, plants and wildlife into buildings through good architectural design. Given this, we will seek to negotiate biodiverse green and blue roofs in all suitable developments and 'features' such as bird and bat boxes/artificial bat roosts, and bee bricks subject to the impact on heritage assets and amenity.

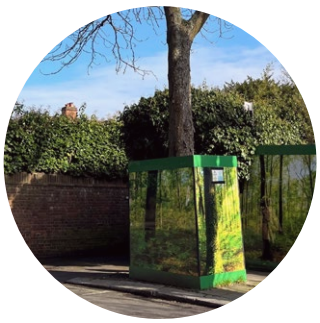
11.48 There are populations of threatened bird species in the borough linked to the loss of habitat and nest sites and the impacts of climate change. Swifts specifically are an important indicator of a healthy biodiverse environment. We will use planning conditions to ensure new buildings, including home extensions, provide integrated swift bricks unless it has been demonstrated to the Council's satisfaction this is not feasible. Typically, a building needs to be at least 5 metres in height with clearance of around 5 metres between the host building and other buildings/ obstructions. Swift bricks help to support a wide range of small bird species including swifts, house sparrows and starlings. British Standard BS 42021 sets out how they should be installed. Alternatively, artificial nest cups for house martins may be appropriate.

Management and monitoring

11.49 Once a development has been completed, the management and monitoring of habitats may be required. Management plans are used to ensure areas with nature conservation value are retained and reach their full potential by having effective maintenance arrangements in place. This includes giving consideration to mowing regimes in areas dedicated to wildflower planting. Monitoring is used to confirm that relevant environmental measures are being implemented successfully.

11.50 The demolition and construction process can also pose a significant risk to habitats and species, including green corridors. Given this, in order to protect biodiversity, the Council will expect a construction management plan for developments adjoining or within sites of high nature conservation value.





Tree planting and protection

11.51 Tree planting is recognised as an important way of reducing carbon emissions through carbon storage.

11.52 Furthermore, trees provide habitats for wildlife and are important for their visual amenity. Woodland and individual trees can help to provide shade, aid water attenuation, help to preserve soils and increase biodiversity. They can act as stepping-stones for wildlife throughout the landscape and provide important wildlife corridors within the urban environment. Trees can also make places more attractive and cohesive, encourage increased use of walking and cycling routes and contribute to greater health and well-being.

11.53 The National Planning Policy Framework acknowledges the important contribution that trees make to the mitigation of and adaptation to the effects of climate change, as well as to the character and quality of urban environments. It requires that existing trees are retained wherever possible and that opportunities are taken to incorporate trees in new developments, including through the creation of tree-lined streets and the introduction of measures such as community orchards.

11.54 The Council's Tree Planting Strategy sets out the Council's ambitions to increase tree canopy cover in the borough by 3.7% by 2045 (against a baseline of 23% in 2016) and increase tree diversity on land it owns and manages. Policy NE3 below explains how the planning process will support tree planting and protection within development sites and, where appropriate, in the local area.

Policy NE3
Tree Planting and Protection

A. The Council will seek to protect existing trees and secure additional tree planting in the borough. We will:

1. resist the loss of a tree, group of trees, area of woodland, and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. We will also resist proposals which may threaten their continued well-being;
2. make Tree Preservation Orders (TPOs) when necessary to protect specific trees, groups of trees, or woodlands, in the interests of amenity and biodiversity;
3. require applicants to undertake tree surveys, arboricultural impact assessments and the recording of ancient and veteran trees, where appropriate;
4. ensure that where trees are to be retained on developments, these are positively integrated into the design and layout of the proposed scheme;
5. require trees and vegetation, that are to be retained, to be satisfactorily protected both during and following the demolition and construction phase of development, in line with BS5837 'Trees in relation to Design, Demolition and Construction', to minimise any adverse impacts on existing trees and vegetation;
6. require replacement trees and/or vegetation to be provided where the loss of, or harm to, the well-being of significant trees and/or vegetation has been justified in the context of the proposed development. New tree planting should be guided by a benchmark of planting two new trees for each one lost;
7. prioritise securing replacement trees and vegetation on-site. Where it can be demonstrated to the Council's satisfaction that this is not possible, a financial contribution will be secured to enable the planting and subsequent maintenance of replacement trees and vegetation off-site;
8. require developments to incorporate additional trees and vegetation wherever possible, and especially in areas of low tree cover, as part of a detailed landscaping scheme for the site. A landscape management plan must also be submitted for all major developments, including, but not limited to, details of the trees and vegetation to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development; and
9. expect the applicant to replace trees lost prematurely due to death or disease up to 10 years from when the landscaping plan was implemented.

Tree protection

11.55 The Council will seek the retention of trees and vegetation of significant amenity, historic, cultural or ecological value. This includes trees within the public highway and on land adjacent to development sites which can potentially be affected by a proposed development. Trees and vegetation are important to the contribution that a site and its setting make to townscape character and amenity, and have a sense of maturity which replacement planting may lack. Ancient woodland and ancient or veteran trees found outside ancient woodland are particularly valuable, as once lost they can never be replaced. The ancient woodland in Camden forms part of the Hampstead Woods Site of Special Scientific Interest (SSSI).

11.56 A tree survey will be needed for any site with a tree or where the Root Protection Area on a neighbouring site would be affected. The survey should identify which trees will be retained and protected on-site. An arboricultural impact assessment will also be required to ensure that all possible impacts of a scheme on trees and vegetation are fully considered, and that potential harm is avoided or successfully addressed.

11.57 Applicants will be required to take measures to minimise any adverse impacts from development on retained and proposed trees and vegetation as far as possible. This includes the potential risk of damage arising from demolition or construction works, and development that fails to allow sufficient space above and below ground to prevent damage to root systems or facilitate future growth. These measures should be agreed with the Council prior to commencement and implemented to the Council's satisfaction. Natural England and the Forestry Commission have published 'standing advice' for local planning authorities regarding development proposals affecting ancient woodland, ancient trees and veteran trees. The Council will treat this as a material planning consideration for such schemes and developers will be expected to have due regard to this.

11.58 All design elements of a development should be arranged to ensure a good relationship between the development and trees to be retained and planted. This should ensure new planting has space to develop and mature, and existing trees continue to grow and flourish, without causing harmful nuisance for the occupants of the scheme or surrounding community.

11.59 Camden Planning Guidance on Trees sets out more detail on the information required by the Council to ensure that there is a systematic approach to the safeguarding of trees and vegetation within development sites and on adjacent land (including street trees), both during and following the construction process. Developers will be expected to have due regard to this. The Council will also expect developers to follow the principles and practice set out in 'British Standard 5837 - Trees in relation to design, demolition and construction - Recommendations'.

11.60 Where proposals involve veteran trees, the Council will use planning conditions to require works to be undertaken by arboriculturists with a veteran certificate qualification.

Tree preservation orders

11.61 Many trees in the borough are covered by a Tree Preservation Order (TPO). A Tree Preservation Order is made by the Council to legally protect a specific tree or group of trees that provide public amenity or are of cultural or historic significance. The principal effect of a TPO is to prohibit the cutting down, uprooting, topping, lopping, wilful damage, or wilful destruction of trees without consent.

11.62 As part of the consideration of a planning application the Council will consider whether a TPO is needed. Members of the public can also draw the Council's attention to trees or groups of trees they consider to be important to the area and suitable for a TPO. Outside of the TPO process, some neighbourhood plans have also identified trees considered by the community to be of particular importance or value and developers should have due regard to this.

11.63 Works to trees with a TPO, above or below ground, require the Council's permission. Works to a tree with a TPO that is needed to enable the implementation of a planning permission are dealt with as part of a planning application. The Council can also require existing trees, including those that are not the subject of a Tree Preservation Order, to be protected and retained using planning conditions. Furthermore, the Council also has powers to use 'conditional TPOs' which can be applied prior to planting.

Replacement trees

11.64 Where the felling of either protected or significant trees has been demonstrated to be unavoidable, the Council will seek replacement planting on-site of an appropriate size, number and species in an appropriate location. There will be occasions where it may not be possible for trees – or trees providing the same amenity or biodiversity benefits – to be replaced on-site because of the footprint of proposed new buildings. It will always be the Council's priority for any significant trees lost to be replaced within the curtilage of the development. As a working benchmark, we expect at least two new trees to be planted for every tree lost. This benchmark will be applied flexibility, recognising that site constraints can impact on the ultimate size of trees, and we will therefore give preference to proposals where trees can be sustained into maturity.

11.65 Where it is demonstrated to the Council's satisfaction that replacement planting is not feasible, we will expect equivalent benefits to those provided by existing trees and vegetation to be secured and realistic replacement and/or compensation to be provided. A methodology such as 'i-tree' should be used to inform replacement planting for large major applications (100 or more homes or 2,500 sqm or more commercial floorspace). The i-tree tool can be used to quantify the value provided by individual trees taking account of benefits they provide such as air quality, carbon dioxide reduction, shading and stormwater management. We will expect applicants bringing forward large major schemes to submit an i-tree assessment (or an alternative methodology which has been agreed with the Council) as part of the planning application.

11.66 The Council will prioritise the use of any commuted sums for the funding tree of planting in the immediate area, for example tree planting on Council owned land such as highways, parks, housing estates and nature reserves. This funding will also be expected to cover maintenance costs, and will be secured by a S106 agreement.

Tree planting

11.67 Section 197 of the Town and Country Planning Act 1990 places a duty on the Local Planning Authority to secure the planting of new trees. This will partly be delivered by increasing planting on private land, and by helping developers and residents to make informed choices in relation to the planting of trees. Applicants should seek opportunities to restore and enhance planting throughout the site as part of their landscaping scheme. The Council will take a 'right tree for the right place' approach with the aim of delivering an attractive treed environment with age and species diversification. This will also ensure that trees have the optimum conditions for establishment and longevity for future generations to enjoy. The landscaping or planting scheme should take into account the impact of trees when they are fully grown and provide sufficient replacement trees to mitigate the loss of canopy cover where appropriate.

11.68 There are a range of factors that applicants should be aware of when considering new tree planting, including:

- the amenity value of any trees to be removed;
- ecology – the Council will expect new trees and vegetation to increase the biodiversity value of the site;
- historic context – trees should take account of the existing qualities of the site and complement the surrounding architecture and the historic landscape character, recognising the evolution and use of the site, the local character and important views;
- the desirability of including suitable native species, including the use of locally or UK sourced and grown stock;
- availability of space – this should take account of both Root Protection Areas and buffer zones, as well as the impact of different tree species on buildings above and below ground and ancillary structures, such as boundary walls. The Council will also expect the planting plan to consider the potential for trees, over their lifetime, to give rise to unacceptable loss of light to habitable rooms and any necessary clearances for CCTV, street lighting and overhead cables and high/large vehicles. Trees should be planted in positions which permit a tree to grow to maturity without inhibition of form;
- soil conditions including hydrogeology – ensuring there is sufficient soil volume, the right soil type and drainage in order that roots can grow and function properly;
- potential for improvements to air and soil quality;
- resilience to pests and disease;
- adapting to climate change – taking opportunities to improve a site/area's sustainability and function. Applicants should also consider the ability of trees/vegetation to withstand drought and extreme weather, and changes in the prevalence of pathogens;
- long-term resource consumption - the level of input required for the management and maintenance of trees and the effect this has on lifespan; and
- advice in BS 8545 Trees: from nursery to independence in the landscape – Recommendations.

11.69 Information on Camden's wider tree population is set out on the Council's Open Data platform and will be a useful resource for applicants to inform planting schemes.

Tree maintenance

11.70 It is important that there is a robust management regime for newly planted trees and landscaping schemes to ensure that trees and vegetation are able to reach maturity and deliver maximum benefits and functions throughout their life. Maintenance requirements and aftercare management should be considered during the design stage (for example ensuring there is access for maintenance, storage for materials on-site and availability of sources of water). This will also ensure that the overall sustainability of the planting scheme is acceptable, and that trees and vegetation do not become a nuisance.

11.71 The Council will expect the detailed landscaping scheme or planting plan to include a management plan, to be secured by a planning condition or in a Section 106 agreement. This will ensure that all planting on site is sustainable and adequately maintained in line with standard BS8545 for a sufficient duration. The Council will also expect the applicant to replace trees lost prematurely due to death or disease up to 10 years from when the landscaping plan was implemented.

Water quality

11.72 It is important that we take steps to safeguard water quality in Camden to protect drinking water and prevent harm to the natural environment.

11.73 Development activities may impact surface water and groundwater quality. The way water is used in a building and the pollutants it picks up running across a site also affect the quality of the water that reaches groundwater sources.

11.74 Camden has one groundwater Source Protection Zone (SPZ) with an inner and outer catchment. These are water abstraction sites whose purpose is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon drinking water abstraction. The inner SPZ is located within the southwest of Primrose Hill Park with the outer zone located in south Hampstead covering the area from Prince Albert Road to Swiss Cottage.

11.75 Areas to the north and south of Camden (around Hampstead Heath, Hampstead, Bloomsbury and Holborn) are also designated as Secondary A aquifers which are capable of supporting local water supply. As such, groundwater is sensitive in these areas and the quality and quantity of groundwater needs to be protected.

11.76 Policy NE4 seeks to protect water quality in Camden and ensure that the groundwater SPZ and Secondary A Aquifers set out above and designated on the Local Plan Policies Map are taken into account when considering the environmental impact of a development.

Policy NE4
Water Quality

A.	The Council will expect developers to identify whether their site is within the borough's groundwater Source Protection Zone or Secondary A aquifers, and whether the development activity could affect the quality or quantity of groundwater.
B.	Where development poses a risk to groundwater within the borough's groundwater Source Protection Zone, applicants must submit a Hydrogeological Risk Assessment. If the Hydrogeological Risk Assessment identifies unacceptable risk, the developer will be required to provide appropriate mitigation.
C.	The Council will require developers to undertake a Foundation Works Risk Assessment (FWRA) where piled foundation works are proposed within a SPZ, or where piled foundations extend through the London Clay to Secondary A aquifers, to ensure that the risks to groundwater are minimised.
D.	The Council will require development within the borough's Secondary A aquifers to protect groundwater from pollution.
E.	The Council will expect developers to prevent discharges to groundwater through land affected by contamination.
F.	All development proposals located adjacent to the Regent's Canal are required to protect and improve the benefits provided by the water environment to help to ensure that the waterway can reach and maintain good ecological status, in accordance with the recommendations of the Thames River Basin Management Plan.

Groundwater designations

11.77 The Council's Local Plan Policies Map and Strategic Flood Risk Assessment identifies the borough's groundwater SPZ and Secondary A aquifers. Developers will be expected to identify within their planning application whether a site is within one of these designated areas and if the development activity proposed has the potential to affect groundwater quality or quantity. The assessments identified in the sections below should be submitted with a planning application when this applies.

Hydrogeological risk assessment

11.78 Developments that pose a risk to groundwater must submit a Hydrogeological Risk Assessment (HRA) to the Environment Agency and the Council as planning authority. Any activities that can adversely affect groundwater must be considered, including physical disturbance of the aquifer. 'The Environment Agency's approach to groundwater protection' identifies a number of development activities which could result in physical disturbance to aquifers and groundwater resources. These include: ground source heat pumps; new road schemes; developments that require piling; foundation development; and basement excavations. These activities can artificially lower or raise groundwater levels, alter groundwater flow paths, or even cut off groundwater flow completely. This can all result in water resource and quality problems.

11.79 If the HRA identifies unacceptable risk, then the applicant must provide appropriate mitigation, which should be agreed by the Council and Environment Agency in writing prior to implementation. Within the inner groundwater SPZ, the Environment Agency will normally object in principle to any planning application that may physically disturb an aquifer.

Foundation works risk assessment

11.80 Where piled foundation works are proposed in the groundwater SPZ, or where piled foundations extend through the London Clay to Secondary A aquifers, then a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised. Current available guidance includes the Environment Agency's Piling in layered ground: risks to groundwater and archaeology, and Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (National Groundwater and Contaminated Land Centre report NC/99/73).

Protecting groundwater from pollution

11.81 Secondary A aquifers support water supplies at a local, rather than strategic, scale. As such, groundwater is sensitive in these areas and the quality and quantity of groundwater should be protected and enhanced through any future development works. The Environment Agency's Approach to Groundwater Protection should be consulted for development constraints at sites above Secondary A aquifers.

11.82 Where land is potentially contaminated as a result of current or former uses, applicants will be required to carry out a Preliminary Risk Assessment to identify any potential impact on water quality. The Council will expect developers to prevent discharges to groundwater through land affected by contamination.

11.83 Further details on the Council's requirements in relation to assessing and remediating contaminated land are set out in Policy A1 (Protecting Amenity) and in Camden Planning Guidance on Amenity, to which developers will be expected to have due regard.

Thames river basin management plan

11.84 The Water Framework Directive requirements for wastewater and improvements to the water environment are maintained through the Thames River Basin Management Plan and Catchment Plans.

11.85 Camden is within the Thames River Basin District and London management catchment. The Regent's Canal (which is a branch of the Grand Union Canal) runs through the centre of the borough. The Canal forms part of London's Blue Ribbon Network, which has its own set of policies within the London Plan. The quality of the Regent's Canal is of 'moderate' status, and is not reaching 'good' as mitigation measures still need to be implemented. The Council will have regard to the Thames River Basin Management Plan, which contains the actions needed to tackle the main issues of the water environment, when assessing development proposals located adjacent to the Regent's Canal.