

Sustainability Appraisal of Camden's Local Plan

Non-technical summary

February 2016

Camden Local Plan Sustainability Appraisal

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1.0 Introduction

The Camden Local Plan will replace the Council's current Core Strategy and Development Policies (planning documents, adopted in 2010). It will ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the Borough's unique characteristics and contribute to delivering the Camden Plan and other local priorities. The Local Plan will cover the period from 2016 - 2031.

As part of the process for preparing the Local Plan, there is a statutory requirement to undertake a Strategic Environmental Assessment (SEA) and Sustainability Appraisal. These procedures have been combined into a single appraisal entitled 'Sustainability Appraisal' or 'SA', for which the overall aim is to ensure that the plan contributes to the achievement of sustainable development. The use of the term SA throughout this document also encompasses any relevant requirements of an SEA.

This is the non-technical summary of the SA report being published for consultation alongside the Proposed Submission version of the Local Plan. This summary should be read alongside the main SA Report and the Scoping Report. .

2.0 SA framework

The SA Scoping Report for the Local Plan reviews existing plans, programmes and sustainability objectives, sets out the existing baseline and key sustainability issues; and establishes the SA framework to be used in the appraisal process.

Table 1 presents a brief review of key baseline issues; whilst Table 2 presents the SA framework.

Table 1: Key issues

Environmental

- Significant proportion of the borough is covered by conservation areas, with a high proportion of listed buildings (5,645), and non-designated heritage assets (local list).
- Parts of Camden have the poorest air quality in London. The borough has been declared as an Air Quality Management Area since 2010.
- Approximately 38,800 properties in Camden are within areas at risk of surface water flooding.
- There is a significant shortage of land available for development and therefore limited scope for creating new open space.
- The projected increase in the borough's population will place increased pressure on existing waste management facilities.
- The Open space review highlighted areas in the borough which are deficient in access to open space.
- Camden has small areas of UK Biodiversity Action Plan priority habitats (habitats that are nationally important) including acid grassland and heathland.
- In Camden, over 25% of the boroughs carbon dioxide emissions result from

heating and powering homes – issue is encouraging energy efficiency improvements to existing stock.
<p>Social</p> <ul style="list-style-type: none"> • The cost of buying a home in Camden is 13.7 times higher than the average income • Older people are expected to become an increasingly large proportion of the population. • Up to 16 gypsy and traveller pitches required by 2031 (2 – 7 pitches in the first 5 years). • The borough is home to the largest student population in London. • There is significant disparity between wards in Camden. • Camden has one of the largest health inequality gaps between occupational groups in England for both men and women. • Need for school places remains high.
<p>Economic</p> <ul style="list-style-type: none"> • Employment land under threat by demand from higher value housing development. • The demand for services that support the Central Activities Zone is likely to grow. • Despite London and National trends, Camden experienced a reduction in vacant premises in protected shopping frontages (2013).

Table 2: The SA framework

No.	Objective	Criteria
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> a) Will the Local Plan increase the supply of housing b) Will the Local Plan protect and promote affordable housing development c) Will the Local Plan provide housing for people, particularly families, on moderate and lower incomes? d) Will the Local Plan encourage development at an appropriate density, standard, size and mix? e) Will the Local Plan provide everybody with the opportunity to live in a better home?
2	To promote a healthy and safe community	<ul style="list-style-type: none"> a) Will the Local Plan promote healthy living through e.g. provision of walking, cycling and recreation facilities? b) Will the Local Plan help to promote safety and reduce levels of crime, anti-social behaviour and fear of crime? c) Will the Local Plan encourage improved provision of healthcare facilities in areas of need?
3	To ensure access to local shopping, community, leisure facilities and open space	<ul style="list-style-type: none"> a) Will the Local Plan encourage mixed-use development? b) Will the Local Plan encourage the retention and development of key services (e.g. shopping, community and leisure facilities)? c) Will the Local Plan encourage the location of services in proximity to public transport or increase access to services by public transport? d) Will the Local Plan help to protect, increase/improve open space?
4	To tackle poverty and	<ul style="list-style-type: none"> a) Will the Local Plan encourage development that

No.	Objective	Criteria
	social exclusion and promote equal opportunities	<p>facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Will the Local Plan provide for equality of access for all to buildings and services?</p> <p>c) Will the Local Plan encourage development opportunities in those areas in need of economic development?</p>
5	To encourage and accommodate sustainable economic growth and employment opportunity	<p>a) Will the Local Plan encourage the retention and growth of existing, locally based industries?</p> <p>b) Will the Local Plan accommodate new and expanding businesses?</p> <p>c) Will the Local Plan encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Will the Local Plan focus growth in growth areas, Central London and in town centres?</p>
6	To maximise the benefits of regeneration and development to promote sustainable communities	<p>a) Will the Local Plan encourage investment that will promote social well-being and benefit the economy?</p> <p>b) Will the Local Plan promote access to employment opportunities for local people?</p> <p>c) Will the Local Plan provide for adequate education facilities, including life-long learning?</p> <p>d) Will the Local Plan encourage housing development to meet the needs of the local people?</p>
7	<p>i - To promote high quality and sustainable urban design</p> <p>ii – To protect and enhance the historic environment</p>	<p>a) Will the Local Plan provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</p> <p>b) Will the Local Plan ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Will the Local Plan ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value?</p> <p>d) Will the Local Plan encourage the use of sustainable design and construction?</p>
8	To ensure new development makes efficient use of land, buildings and infrastructure.	<p>a) Will the Local Plan encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</p> <p>b) Will the Local Plan ensure efficient use of land through maximising densities where appropriate?</p>
9	To reduce reliance on private transport modes and enhance permeability for non-motorised travellers.	<p>a) Will the Local Plan encourage development at locations that enable walking, cycling and/or the use of public transport?</p> <p>b) Will the Local Plan encourage the provision of infrastructure for walking, cycling and/or the provision of public transport?</p> <p>c) Will the Local Plan encourage access for all to public transport?</p> <p>d) Will the Local Plan encourage an increase in car free and car capped housing?</p> <p>e) Will the Local Plan encourage the transportation of freight by means other than road?</p>
10	To improve amenity by minimising the impacts associated with development	<p>a) Will the Local Plan ensure that the amenity of neighbours is not unduly impacted?</p> <p>b) Will the Local Plan ensure that development and operations will not affect noise sensitive uses?</p>

No.	Objective	Criteria
11	To protect and manage water resources and reduce surface water flood risk	<ul style="list-style-type: none"> a) Will the Local Plan promote the sustainable use of water resources? b) Will the Local Plan encourage development that incorporates sustainable drainage? c) Does the Local Plan take into account potential flood risk in Camden? d) Will the Local Plan promote the protection and enhancement of the quality of Camden's waterways?
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<ul style="list-style-type: none"> a) Will the Local Plan protect and enhance natural habitats in the borough, particularly those of priority species (includes terrestrial and aquatic)? b) Will the Local Plan provide for the protection of biodiversity and open space in the borough? c) Will the Local Plan encourage the creation of new habitats, including through the provision of additional open space and green roofs? d) Will the Local Plan protect and provide for the protection and planting of more trees in the borough?
13	To reduce the amount of waste requiring final disposal	<ul style="list-style-type: none"> a) Will the Local Plan ensure reduction of waste during the development process and/or operation? b) Does the Local Plan encourage the movement of waste up the hierarchy? c) Does the Local Plan provide for the future demand for waste management
14	To improve air quality	<ul style="list-style-type: none"> a) Will the Local Plan help to reduce the discharge of particulate matter to the atmosphere? b) Will the Local Plan contribute to an improvement of air quality? c) Will the plan encourage the use of alternative modes of transport to the private car?
15	To provide for the efficient use of energy.	<ul style="list-style-type: none"> a) Will the Local Plan encourage the generation and use of renewable energy? b) Will the Local Plan encourage energy efficiency? c) Will the Local Plan help tackle fuel poverty? d) Will the Local Plan reduce CO₂ and other greenhouse gas concentrations in the atmosphere?
16	To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> a) Will the Local Plan encourage the re-use of resources? b) Will the Local Plan encourage a more efficient supply of resources? c) Will the plan encourage sustainable design and construction?

3.0 Appraisal of alternative options

The preparation of the Proposed Submission version of the Local Plan has been informed by an appraisal of alternative options for a range of policy issues. Alternatives assessment findings are presented within the SA Report.

The SA Report presents information on alternatives in relation to the following policy issues -

Affordable sliding scale
 Affordable housing tenure
 HMOs
 Mix of house sizes
 Housing as priority use
 Student housing
 Employment land and buildings
 Industrial areas

Advertisements
 Basements
 Local green space
 Public open space
 Car parking
 Pubs
 Town centres

The assessment process helped to present the Council’s thinking on alternatives, seek further engagement and identify a preferred way forward for these policy issues. For example, notable appraisal findings are presented under the headings of ‘Affordable housing sliding scale’, ‘Employment land and buildings’, and ‘Industrial areas’.

In relation to ‘Affordable housing’ the appraisal highlights that the preferred approach (sliding scale) performs well in relation to a range of objectives including ‘community’. The alternative option (no sliding scale) does have merit in that it would theoretically provide more affordable homes and thus have a significant positive impact on the objective relating to poverty and social exclusion; however, there would be a damaging effect on housing delivery in the borough. Proceeding with a steeper sliding scale is the most practical option for maximising the provision of affordable housing, without reducing the number of homes on small sites and overall housing delivery.

In relation to ‘Employment’ the appraisal highlights that the preferred approach (intensification and possible redevelopment of employment sites) performs well in relation to objectives on the efficient use of land, economic growth, and encouraging investment. While the alternative option (greater flexibility on employment sites) was shown to perform well for the provision of housing, it had quite negative effects on economic growth and opportunity.

In relation to the ‘Industrial area’ the appraisal findings indicate that the preferred approach (intensify uses in the industrial area) performs very well against objectives on the efficient use of land, economic growth and investment. The alternative option (protecting the industrial area) does have merit in that it would look to ensure that the current industrial area would not be subject to any non-industrial/warehousing development; however, on balance this option performs less well in terms of encouraging investment and economic growth.

4.0 Appraisal of the preferred approach

Chapter 7 of the SA Report presents an appraisal of the draft Plan under the SA framework. Rather than simply presenting a discussion of the plan as a whole, the appraisal considers components of the plan in turn.

Summary appraisal findings are presented within the table below, with each row covering a specific component of the Plan.

Summary of appraisal findings
Spatial strategy
The Council’s objective here is to create the conditions for growth to provide for needed homes, jobs and other facilities, while ensuring this growth delivers opportunities and benefits for our residents and businesses.

The spatial strategy is likely to deliver a number of positive impacts which are interlinked to a number of policies in the Local Plan. Negative impacts that have potential to arise through the promotion of growth include those on amenity and heritage, which will be mitigated by detailed policies in the Plan.

Housing

Maximising housing supply – affordable housing, and choice and mix

Housing policies in the Plan would have a number of major/minor positive effects in that they promote the provision of high quality and affordable housing that meets local needs.

Types of housing to meet local needs

Policies on large and small homes, student housing, housing for vulnerable people and the elderly, accommodation for travellers and houses in multiple occupation will provide major and minor positive effects on sustainability objectives. Particularly those that relate to providing housing that meet local needs and tackling poverty and social exclusion.

The appraisal has helped to identify ways where the positive effects of the policies can be enhanced.

Community, health and wellbeing

Policies in the Plan look to support and provide services for those who live, work and visit Camden.

The Plan is shown to have a number of major and minor positive effects, particularly on promoting healthy and safe communities with access to community and leisure facilities.

The appraisal has helped to identify ways where the positive effects of the policies can be enhanced.

Town centres and shopping

Town centre and shopping policies seek to ensure a range of shopping and town centre facilities are available for all those who live, work and visit the borough. The appraisal has shown that these policies have major and minor positive effects on economic growth, sustainable communities and active travel (walking distance to local shops).

The appraisal has helped to identify the negative impression made by the markets policy which has been improved in the submission draft.

Economy and jobs

Economy and jobs policies seek to support local enterprise development, employment and training schemes for local people. The policies particularly benefit those in Camden seeking employment and training opportunities. The promotion of appropriate intensification of employment sites will also contribute towards economic growth and increasing the supply of quality housing in some cases.

Transport

The Plan seeks to reduce the reliance on private transport modes and enhance permeability and active travel choices for non-motorised travellers. This approach is shown to have positive effects on health and wellbeing objectives through the

<p>promotion of physical activity and possible improvements to local air quality.</p> <p>The appraisal has helped to open discussion on potential negative effects of a borough-wide car-free approach, although it is considered that the positive effects outweigh any negatives. Other negative effects outlined in the SA Report relate to construction work on amenity and aquatic biodiversity from promotion of canal freight.</p>
<p>Sustainability</p> <p>Policies in the plan seek to ensure that development: reduces carbon emissions; is adaptable to the effects of climate change; reduces the effects - and does not contribute to poor air quality; and reduces the amount of waste for disposal.</p> <p>The appraisal has identified a number of major and minor positive effects. The potential for negative effects on promoting energy efficiency measures on heritage assets are addressed in the SA Report. The appraisal has also highlighted conflict between promoting the growth of decentralised energy in the borough and improvements sought for local air quality.</p>
<p>Design and heritage</p> <p>Camden has a rich architectural heritage and policies in the plan relating to design and heritage have major positive effects in terms of protection and enhancement. The Plan seeks to secure high quality design in development, positive effects are expected on urban design objective and other objectives relating to health and housing.</p> <p>The appraisal also highlighted areas of potential conflict between the promotion of sustainable design measures and the importance of protecting heritage assets. The protection of heritage assets was also noted for potential negative impacts on restricting development and the retention of properties in disrepair.</p>
<p>Amenity</p> <p>Amenity policies in the Plan seek to protect the amenities of all those who live, work and visit the borough from potential negative impacts associated with development.</p> <p>These policies have been shown to have major and minor positive effects, having strong connections with health and wellbeing.</p>
<p>Open space and biodiversity</p> <p>The Plan sets out the key means of protecting and enhancing existing habitats and biodiversity through the protection of designated nature conservation sites and provision and enhancement of open space.</p> <p>The role these have in the borough in protecting habitats and providing open space for public enjoyment are outlined in the SA Report.</p>

8.0 Conclusions and monitoring

At this stage of the plan making process the assessment has shown that the Local Plan performs well across all of the SA objectives. Its good performance is the result of its iterative development, with appraisal findings and consultation responses feeding into it.

Over the past two years appraisal has highlighted areas where there would be potential negative effects in relation to SA objectives and mitigation measures have been included to either eliminate or reduce these effects.

The monitoring process set out in Chapter 11 of the Local Plan Submission draft will enable the significant effects (including negative effects) of implementing the Plan to be monitored. A principal tool in the monitoring process will be the Camden Authority Monitoring Report, which assesses progress for a range of areas, including environmental factors such as air quality, biodiversity waste and renewable energy generation, employment and town centres, housing delivery and transport.