

# Sustainability Appraisal of Camden's Local Plan

February 2016

## Contents

1.0 Introduction

2.0 SA process and methodology

3.0 Local Plan content, vision, themes and objectives

4.0 SA framework

5.0 Testing the Local Plan objectives against the SA framework

6.0 Appraisal of alternative options

7.0 Appraisal of the preferred approach

8.0 Conclusions and monitoring

### Appendices

Appendix A – SEA compliance

Appendix B – SA objectives and criteria

Appendix C – Alternative options appraisal

Appendix D - Preferred options appraisal

Appendix E – Health Impact Assessment

# 1. Introduction

## Context

- 1.1 The Local Plan will set out the boroughs vision, strategy and objectives for development in the borough. Once adopted, the Local Plan will replace the existing Core Strategy and Development Policies Document of the LDF. The development plan will include the Site Allocations document, Fitzrovia Area Action Plan, Euston Area Plan and Fortune Green and West Hampstead Neighbourhood Plan. The North London Waste Plan and any further Neighbourhood Plans would also form part of these documents once adopted.
- 1.2 This document is the Sustainability Appraisal (SA) report which has been prepared for publication alongside the proposed submission version of the Camden Local Plan. It is the outcome of an SA process undertaken alongside plan-making.

## Requirement for Sustainability Appraisal

- 1.3 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 process entitled 'Sustainability Appraisal' (SA).
- 1.4 SA is an iterative process undertaken during the preparation of a plan, which identifies and reports on the extent to which the implementation of a plan and alternatives would achieve the environmental, social and economic objectives by which sustainable development can be defined.
- 1.5 The use of the term SA throughout this document also encompasses any relevant requirements of an SEA. Appendix A to this report includes a table setting out where specific SEA requirements have been addressed.
- 1.6 SA is an ongoing process, which seeks to improve the sustainability performance of a plan by testing it throughout its preparation in order to expose any weaknesses in its contribution to achieving sustainable development. It is an integral part of good plan-making, and to enable it to be effective and worthwhile, the appraisal must start early in the plan-preparation process. By doing so, SA assists with the identification of sustainability issues and the formulation of sustainability objectives (the SA framework) which is used to appraise alternative options during the plan preparation process.

## Purpose of this Sustainability Appraisal Report

- 1.7 This document essentially seeks to present information on the merits of the Plan and alternatives. It shows how work to date ('Interim SA'), and in particular work to appraise alternatives, contributed to the decision on the

preferred options and the drafting of the plan; and then it presents an appraisal of the plan as it currently stands.

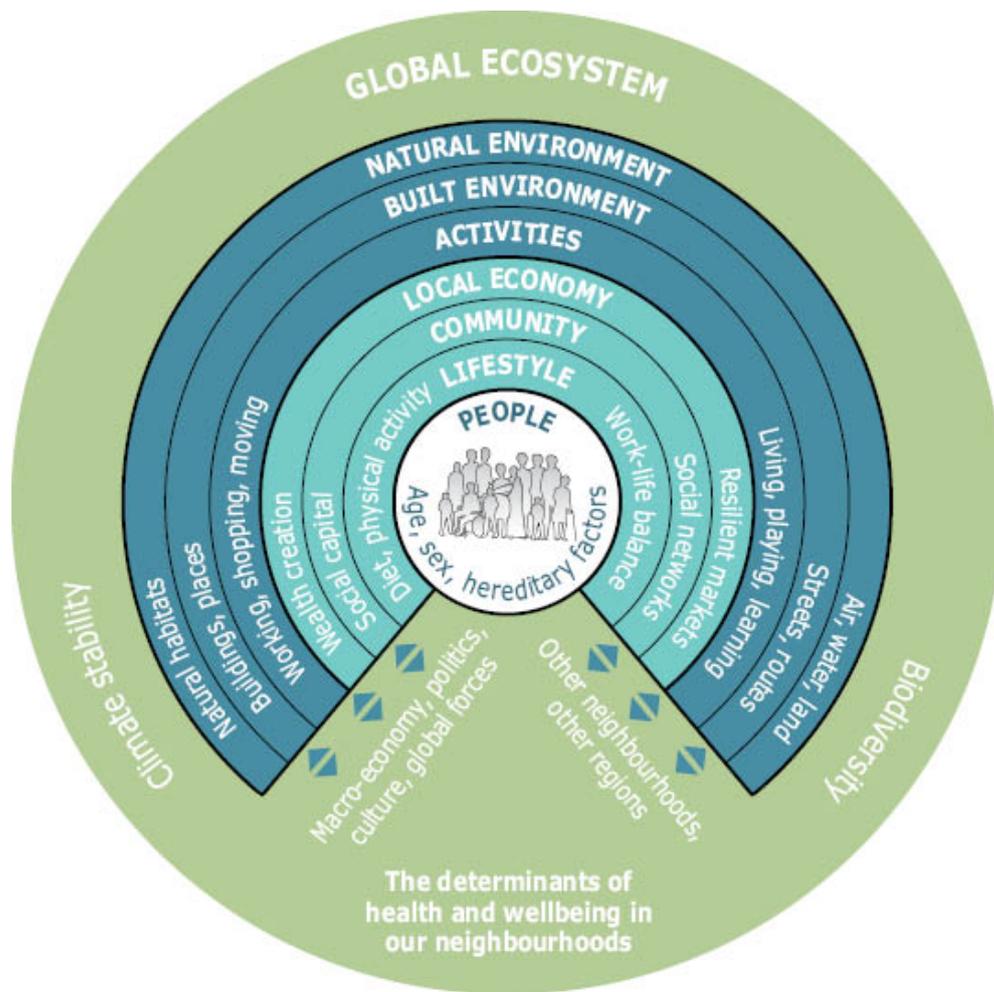
- 1.8 The Core Strategy and Development Policies Document of the LDF were adopted in 2010 and were subject to SA. The stages of SA, including the assessment of reasonable alternatives, remain relevant. The earlier SA Scoping report provides the framework for the sustainability appraisal of the Local Plan.
- 1.9 Work to update the SA Scoping report has also been undertaken following further evidence gathering and input from the consultation bodies.
- 1.10 The Local Plan has been prepared to achieve consistency with and to implement the London Plan. Other key policy documents which will form part of Camden's Local Plan are: Camden Site Allocations, Fitzrovia Area Action Plan, Euston Area Plan, Fortune Green, and West Hampstead Neighbourhood Plan and any other adopted Neighbourhood Plan. These documents have been subject to sustainability appraisals, which have influenced their content and approach. This SA therefore needs to be read in this context. It will not reappraise the policy directions of these documents.

### **Integrated appraisal**

- 1.11 Following initial SA scoping work and early drafting of the Local Plan it was clear that an integrated appraisal would serve to strengthen and focus the appraisal process. As such the appraisal work has incorporated the following assessments:

#### ***Health Impact Assessment (HIA)***

- 1.12 HIA predicts the health consequences of implementing a plan or development. It is a useful tool to identify ways which the Local Plan can enhance positive health impacts and minimise or avoid negative consequences.
- 1.13 Determinants of health are the focus for HIA, these are: social, economic; environmental; and cultural factors that directly or indirectly influence health and wellbeing. Planning can play a pivotal role in influencing all of these key health determinants, especially towards improving long term outcomes and addressing health inequalities. The 'Determinants of Health' are explained further in the diagram below (The Health Map, Barton and Grant, 2006).



1.14 Early scoping work identified that the SA of the LDF did not contain specific indicators for health. Therefore, we have attempted to address this by working with Camden and Islington Public Health Department in developing baseline indicators which have served to inform our SA objectives.

1.15 The baseline information was used to identify key sustainability issues for Camden and the majority of these issues related to health and wellbeing. For further information please see our [SA Scoping Report](#).

1.16 The combination of baseline information, review of relevant plans and programmes, and sustainability issues, contributed to the development of sustainability appraisal objectives and indicators which are used to assess the sustainability of our plan proposals. The majority of sustainability objectives are related to health and wellbeing. These are:

- To promote the provision of a range of high quality and affordable housing to meet local needs;
- To promote a healthy and safe community;
- To ensure access to local shopping, community, leisure facilities and open space;

- To tackle poverty and social exclusion and promote equal opportunities;
- To encourage and accommodate sustainable economic growth and employment opportunity;
- To maximise the benefits of regeneration and development to promote sustainable communities;
- To promote high quality and sustainable urban design which conserves and enhances the historic environment;
- To reduce reliance on private transport modes and enhance permeability for non-motorised travellers;
- To improve amenity by minimising the impacts associated with development;
- To protect and manage water resources and reduce surface water flood risk;
- To improve air quality;
- To provide for the efficient use of energy;
- To minimise the use of non-renewable resources.

1.17 As noted above, matters of health and wellbeing have been a key consideration in this SA and the Local Plan and should run through this document.

1.18 The HIA has assessed the health consequences of implementing the plan, as well as identifying ways to enhance positive health impacts or avoid/mitigate negative impacts. A summary of assessment findings are presented in Appendix E of this report.

#### ***Equality Impact Assessment (EqIA)***

1.19 An Equality Impact Assessment of the draft Local Plan has also been carried out, meeting the general equality duty under the Equalities Act 2010. The Equality Impact Assessment considered the impact of the plan on groups that are protected in terms of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. All groups will enjoy the benefits of policies within plan. Disabled people, pregnant women and people from ethnic/religious communities will benefit in particular.

1.20 A small number of less mobile (but not disabled) and therefore more car reliant people (such as young families and older people) have been identified as potentially disadvantaged by Policy T2 Car free development and limiting the availability of parking. Further consultation with groups in areas particularly affected by this is recommended within the assessment. The EQIA also identifies that although in principle, policies within plan will benefit the Gypsy and Traveller community, the council should pursue further opportunities to advance equality in relation to this group. The EqIA will be made available alongside this SA report.

### ***Habitat Regulations Assessment (HRA)***

- 1.21 A Habitats Regulations Assessment (screening) of the draft Local Plan has been carried out in accordance with EC Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora – known as the 'Habitats Directive'. HRA assesses the likely impacts of a plan on the integrity of the Natura 2000 sites.
- 1.22 The screening assessment found that none of the proposed draft policies were found to have likely significant effects on the sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. The full screening assessment will be made available to view alongside this SA report.

### **Structure of this report**

- 1.23 The SA report has been prepared around the following structure:

#### **Introduction**

**Appraisal process & method:** Description of the method used in the SA process including scoping, setting objectives, integrated appraisal and limitations of appraisal.

**Plan content, vision and objectives:** Provides a summary of the vision of the Local Plan and its objectives.

**Sustainability Appraisal framework:** Provides a summary of the plans and programs reviewed, the baseline information and likely evolution without the Plan, and key sustainability issues.

**Testing plan objectives:** This tests the compatibility of Local Plan objectives against SA objectives which helps to refine plan objectives.

**Developing and refining options:** Provides detail in terms of what issues required alternative options to be developed.

**SA Assessment of alternative options:** Alternative options appraisal findings, refinement and alternatives selection.

**SA Assessment of the preferred approach:** Appraisal findings of the preferred approach.

#### **Appraisal conclusions**

## 2. Sustainability appraisal process and methodology

### The sustainability appraisal framework

- 2.1 The SA framework was established subsequent to a process of 'scoping'.
- 2.2 The SA Scoping report for the Local Plan provides a review of other relevant plans and programmes, as well as setting out the baseline characteristics and key sustainability issues in the borough. These are used to identify key sustainability issues to be addressed in the Local Plan. The sustainability objectives were developed in chapter 7 of the Scoping Report (see Appendix B) and have been grouped into topic areas for the purposes of outlining baseline information, these are:
- housing
  - community and wellbeing (inc. health)
  - economy and employment
  - built heritage and landscape
  - efficient land use and soil
  - air quality
  - climate change
  - water
  - biodiversity and open space
  - waste
- 2.3 The sustainability objectives form the basis of the sustainability appraisal of the emerging Local Plan. The performance of the Local Plan objectives and policies (including alternatives) are assessed against each sustainability objective. This enables the sustainability effects and performance of the document to be described, analysed and compared.

### Developing and appraising alternative options

- 2.4 The SEA Directive requires that consideration is given to alternative approaches (options) to addressing key policy issues. The following steps were undertaken:
- I. a list of issues were established to be addressed in the plan;
  - II. a shortlist of issues were identified for alternatives appraisal. These were issues where it was apparent that there was a strategic choice to be made between alternative options. The decision to focus on certain issues was made in light of an understanding that not all need (reasonably) be a focus of alternatives appraisal. For some issues there was an emerging preferred approach (informed by technical evidence and engagement) and it was not clear that formal alternatives appraisal (and consultation on alternatives) would add value.

- III. Alternatives appraisal findings were published in January 2015. Subsequently, it was not deemed necessary to update the list of issues/alternatives that need be a focus of appraisal, although some work was undertaken to update appraisal findings.
- 2.5 For each policy issue that has been a focus of alternatives appraisal the aim of this SA Report is to 1) explain reasons for selecting the alternatives; 2) present alternatives appraisal findings; and 3) explain the reasons for ultimately selecting the preferred option. **Appraising the preferred approach**
- 2.6 The appraisal of the preferred approach is undertaken by grouping policies according to theme/topic. Each of the grouped themes is appraised by assessing the likely significant effects on the baseline, drawing on the sustainability topics / objectives / issues identified in the scoping report. The appraisal was undertaken in an iterative manner, with mitigation measures proposed and taken into account over time. .
- 2.7 The SA is a useful tool which has been integral to drafting of Camden's Local Plan. It is recognised however, that there are a number of uncertainties and limitations that exist in the process, the primary limitation being the ability to predict effects accurately upon baseline information. Where there are assumptions based on limited baseline information, this is explained.

### 3. Local Plan content, vision, themes and objectives

- 3.1 The Local Plan sets out the planning vision and strategy for the borough. It covers the physical aspects of location and land use but also addresses other factors that make places attractive, sustainable and successful, such as social and economic matters. It will play a key part in shaping the kind of place Camden will be in the future, balancing the needs of residents, businesses and future generations.

#### **Local Plan Vision**

"We want to make Camden a better borough — a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone."

- 3.2 The Camden Plan is our five year vision for the borough which sets out how we want to make Camden a better borough by 2017. The Camden Plan focuses on five strategic objectives which will be reflected in the preparation and development of the Local Plan, these are:
- Providing democratic and strategic leadership fit for changing times;
  - Developing new solutions with partners to reduce inequality;
  - Creating conditions for and harnessing the benefits of economic growth;

- Investing in our communities to ensure sustainable neighbourhoods; and
  - Delivering value for money services by getting it 'right first time'.
- 3.3 When the Council adopts the Local Plan it will replace the current Core Strategy and Development Policies Document of the LDF. This document will then, with the Mayor's London Plan, form part of the statutory 'development plan' for Camden, the basis for planning decisions in the borough. The adopted Site Allocations document, Fitzrovia Area Action Plan, and recently adopted Euston Area Plan and Fortune Green and West Hampstead Neighbourhood Plan will also form part of the Development Plan.
- 3.4 The emerging North London Waste Plan and other neighbourhood plans, will form part of Camden's Development Plan when they are formally adopted.
- 3.5 There are 13 objectives in the emerging Local Plan, given that this is a review and refresh of the current plan these have not significantly altered. The Local Plan objectives were tested against SA objectives in the Interim SA January 2015 to ensure compatibility. A review of the appraisal is provided in Chapter 5 of this report.

## 4. Sustainability appraisal framework

- 4.1 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 sustainability appraisal framework to be used in the appraisal process. This section summarises this context, and sets out the sustainability objectives that provide the framework for assessing the sustainability of the Local Plan.

### Plans, programmes and sustainability objectives

- 4.2 Table 1 below lists the key plans and programmes that were reviewed in the early stages of the SA process, additions have been made along the SA journey. The full review is provided in Appendix 1 of the Scoping Report.

Table 1 Key plans and programmes

Ref No	Document Title and link
National	
1.	<a href="#">National Planning Policy Framework 2012</a> Planning Practice Guidance superseded – PPSs & PPGs.
2.	<a href="#">The UK Sustainable Development Strategy: Securing the Future (UK Govt</a>

Ref No	Document Title and link
	<a href="#">2005)</a>
3.	<a href="#">Sustainable Communities: Building for the Future (ODPM 2003)</a>
4.	<a href="#">Sustainable Communities in London: Building for the Future (ODPM 2003)</a>
5.	<a href="#">The Code for Sustainable Homes: Setting the standard in sustainability for new homes (DCLG February 2008)</a>
6.	<a href="#">The Code of Sustainable Homes: Technical Guide – 2010</a>
7.	<a href="#">The National Adaption Programme, 2013</a>
8.	<a href="#">Climate Change: The UK Programme 2006 (UK Govt 2006)</a>
9.	<a href="#">Transport White Paper-The Future of Transport: A Network for 2030 (DoT 2004)</a>
10.	<a href="#">Cutting carbon, creating growth: making sustainable local transport happen – white paper January 2011</a>
11.	National Air Quality Strategy for England; Wales; Scotland and Northern Ireland: Working Together for Clean Air (DEFRA 2000 and updated 2003)  <a href="#">The air quality strategy for England, Scotland, Wales and Northern Ireland (Volume 1, 2007; Volume 2, 2011)</a>
12.	<a href="#">Energy White Paper-Our Energy Future, Creating a Low Carbon Economy (DTI 2003) Planning for our electric future: a white paper for secure, affordable, and low carbon technology, July 2012</a>
13.	<a href="#">Building a Greener Future – Towards Zero Carbon Development, 2006</a>
14.	<a href="#">Waste Management Plan for England July 2013</a>  <a href="#">National Planning Policy for Waste 2014</a>
15.	<a href="#">By Design: Urban Design in the Planning System-Towards Better Practice (ODPM and CABE 2000)</a>
16.	<a href="#">Guidance on Tall Buildings (CABE and English Heritage 2007)</a>
17.	<a href="#">The Changing face of the High Street: Decline and Revival (2013) English Heritage</a>
18.	<a href="#">BREEAM Assessment (BRE 2006)</a>

Ref No	Document Title and link
19.	<a href="#">UK Biodiversity Action Plan (1994)</a> <a href="#">Biodiversity 2020: A strategy for England's wildlife and ecosystem services - UK Post 2010 Biodiversity Framework</a>
20.	<a href="#">Working with the Grain of Nature: A Biodiversity Strategy for England (2002)</a>
21.	<a href="#">Fair Society, Healthy Lives, The Marmot Review, 2010</a>
22.	<a href="#">Planning healthier places – report from the reuniting health with planning project, TCPA 2013</a>
23.	<a href="#">Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites – Planning policy for traveller sites (2012)</a>
24.	<a href="#">Thames Corridor Abstraction Management Strategy (Environment Agency, June 2004)</a>
25.	<a href="#">The Community Infrastructure Levy Regulations 2010 and amendments 2014</a>
26.	<a href="#">Model Procedures for the Management of Contaminated Land (Contaminated Land Report 11) (Environment Agency, September 2004)</a>
27.	<a href="#">Thames Region Catchment Flood Management Plan (consultation document, Environment Agency, January 2007)</a>
28.	<a href="#">Environment Agency River Basin Management Plan, Thames River Basin District (2009)</a>
29.	Sustainable Drainage Systems – An Introduction (Environment Agency, May 2003) + <a href="#">Non-statutory technical standards for sustainable drainage systems, DEFRA (2015)</a>
30.	<a href="#">Bringing your rivers back to life – A Strategy for restoring rivers in North London (Environment Agency, February 2006)</a>
31.	<a href="#">Understanding place: conservation area designation, appraisal and management (English Heritage March 2011)</a>
32.	<a href="#">Transport and the historic environment (English Heritage, March 2004)</a>
33.	<a href="#">Streets for All London Manual (English Heritage, March 2000)</a>

Ref No	Document Title and link
34.	<a href="#">Regeneration and the historic environment (English Heritage, January 2005)</a>
35.	<a href="#">Retail Development in Historic Areas (English Heritage, December 2005)</a>
36.	Historic England Good Practice Advice in Planning (2015) <a href="#">Note 1 – The Historic Environment in Local Plans</a> <a href="#">Note 2 – Decision-Taking in the Historic Environment</a> <a href="#">Note 3 – The Setting of Heritage Assets</a>
37.	<a href="#">Guidance on the Setting of Heritage Assets (2011)</a>
38.	<a href="#">Seeing history in the view 2011</a>
39.	<a href="#">Local Green Infrastructure: Helping communities make the most of their landscape, September 2011</a>
London	
40.	<a href="#">The London Plan Spatial Development Strategy for Greater London 2011 – revised early minor alterations 2013</a>
41.	<a href="#">The Mayor’s Transport Strategy GLA 2010</a>
42.	<a href="#">Town Centres SPG 2014</a>
43.	<a href="#">Clearing the air: The Mayor’s Air Quality Strategy (December 2010)</a>
44.	<a href="#">Connecting with London’s Nature: The Mayor’s Biodiversity Strategy (2002)</a> <a href="#">All London Green Grid, 2012</a>
45.	<a href="#">Preparing borough tree and woodland strategies, 2013</a>
46.	<a href="#">The Mayor’s Economic Development Strategy for London (May 2010)</a>
47.	<a href="#">Green Light to Clean Power: The Mayor’s Energy Strategy (2004)</a>
48.	<a href="#">Making business sense of waste: The Mayor’s business waste strategy for London (November 2011)</a>
49.	<a href="#">London’s wasted resource: The Mayor’s municipal waste management strategy</a>
50.	<a href="#">Sunder City: The Mayor’s Ambient Noise Strategy (March 2004)</a>

Ref No	Document Title and link
51.	<a href="#">Cultural Metropolis: The Mayor's cultural strategy – 2012 and beyond, 2010</a>
52.	<a href="#">Accessible London: Achieving an inclusive environment, 2014</a>
53.	<a href="#">The Mayor's Housing SPG 2012</a>
54.	<a href="#">The Mayor's Sustainable Design and Construction SPG, 2014</a>
55.	<a href="#">The control of dust and emissions during construction and demolition, 2014</a>
56.	<a href="#">Draft Social Infrastructure SPG, 2014</a>
57.	<a href="#">Land for Industry and Transport, 2012</a>
58.	<a href="#">London Planning Statement, 2014</a>
59.	<a href="#">Shaping neighbourhoods: play and informal recreation, 2012</a>
60.	<a href="#">Shaping neighbourhoods: Character and context, 2014</a>
61.	<a href="#">Geodiversity of London (draft), July 2008</a>
62.	<a href="#">Rapid Health Impact Assessment Tool, Healthy Urban Development Unit, 2013</a>
63.	<a href="#">Planning and Equality and Diversity in London (October 2007)</a>
64.	<a href="#">London View Management Framework SPG (March 2012)</a>
65.	<a href="#">London Boroughs Gypsy and Traveller Accommodation Needs Assessment 2008</a>
66.	<a href="#">The Mayor's Climate Change Mitigation and Energy Strategy 2011</a>
67.	<a href="#">Mayors draft Climate Change Adaptation Strategy (2010)</a>
68.	<a href="#">Crossrail Mayoral CIL, 2012</a>
69.	<a href="#">Better Environment, Better Health. A GLA guide for London's Boroughs, London Borough of Camden 2013</a>
Local	
70.	<a href="#">The Camden Plan 2012 - 2017</a>
71.	<a href="#">Camden Core Strategy, 2010</a>

Ref No	Document Title and link
72.	<a href="#">Camden Development Policies, 2010</a>
73.	<a href="#">Camden Site Allocations, 2013</a>
74.	<a href="#">Camden Planning Guidance</a>
75.	<a href="#">Conservation Area Appraisal and Management Strategies</a>
76.	<a href="#">London Borough of Camden Annual Monitoring Report – 2012/13</a>
77.	<a href="#">Euston Area Plan – submission draft 2014</a>
78.	<a href="#">Bloomsbury - A Strategic Vision (Farrells) 2006</a>
79.	<a href="#">Camden Housing Strategy 2011 – 2016</a>
80.	<a href="#">Camden Housing Need Study Update, 2008</a>
81.	<a href="#">Camden Social Inclusion Strategy (2003)</a>
82.	<a href="#">Tackling Inequality: Camden's Equality Scheme 2005-2008 and Action Plan (LB Camden 2005) &amp; Task force report 2013</a>
83.	<a href="#">Green Action for change – Camden's Sustainability plan 2011 - 2020</a>
84.	<a href="#">Camden Air Quality Action Plan 2013 -2015</a>
85.	<a href="#">Creative and Cultural Industries in Camden, 2009</a>
86.	<a href="#">Camden Transport Strategy (LIP) 2011-2031</a>
87.	<a href="#">Camden's Noise Strategy (2002)</a>
88.	<a href="#">The Camden Biodiversity Action Plan 2013 – 2018</a>
89.	<a href="#">Camden Strategic Flood Risk Assessment, 2014</a>
90.	<a href="#">Camden's Flood Risk Management Strategy 2013</a>
91.	<a href="#">Camden's Surface Water Management Plan, 2011</a>
92.	<a href="#">Preliminary Flood Risk Assessment: Drain London - London Borough of Camden 2011</a>
93.	<a href="#">Building Schools for the Future – Indicative Strategy for Change Part 1 (LBC 2007)</a>
94.	<a href="#">Change for children and families, delivering the Camden Plan 2012</a>

Ref No	Document Title and link
95.	<a href="#">Camden Open Space, Sport and Recreation Study Review; Atkins; 2014</a>
96.	<a href="#">Camden Statement of Licensing Policy 2011</a>
97.	<a href="#">Let's Talk Rubbish – Camden Waste Strategy 2007 - 2010</a>
98.	<a href="#">Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050; SEA-Renue; 2007</a>
99.	<a href="#">Carbon Management Plan 2010 – 2020</a>
100.	<a href="#">Camden Employment Land Review 2008</a>
101.	<a href="#">Camden Employment Land Study, 2014</a>
102.	<a href="#">Camden Retail and Town Centre Study, GVA 2013</a>
103.	<a href="#">Camden Local Economic Assessment 2011</a>
104.	<a href="#">Camden's Joint Strategic Needs Assessment 2013</a>
105.	<a href="#">Infrastructure study update, 2014</a>

### Baseline characteristics

- 4.3 A baseline was collected for the SA Scoping Report under a number of relevant indicators that were considered to provide a comprehensive picture of the borough as it is now and is projected to be in the future to measure the progress of the Local Plan in achieving sustainable development.
- 4.4 The key findings from the baseline review are outlined below under the topic headings noted in paragraph 2.3 above.

### Housing

- 4.5 Figures for population growth in Camden (ONS 2012 interim) forecast population to increase by 40,738 from 2011-2021. GLA 2012 round projections for the same period projected a population increase of 24,111, however this figure is constrained to the housing trajectory. GLA household projections (also constrained to the housing trajectory) forecast an increase of 15,200 (15%) during 2013-2026.
- 4.6 In line with population, the numbers of households in Camden fell to 70,061 in 1981 and have been increasing ever since to 97,534 in 2011. Whilst the proportion of one person households in Camden had grown from 40% in 1981

- to 46% in 2001, it would seem that the trend is now reversing with 40.5% one person households in 2011. There is a degree of uncertainty however, as to whether this will be a long term trend as this may only reflect the current situation in Camden where house and rental prices remain high, relative to average incomes.
- 4.7 Figures obtained in 2012 showed that average house prices were 13.7 times higher than average income of those living in the borough. The average cost of buying a home in Camden in 2013 across all housing types was £680,697 whilst, house prices across Greater London were considerably lower, at £389,066. This comparison is also the same where rental prices in Camden are higher than the average for Greater London.
- 4.8 The percentage of owner occupiers tripled between 1961 and 1991, but has now stabilised and started to fall at 33% compared to 35% in 2001 and 34% in 1991. The percentage of owner occupation in Camden is similar to the inner London average of 35% and which is about half of that of outer London at 60% (Greater London 49.5%). Renting from the Council has dropped from 34% in 1991 to 23% in 2011 whilst, private renting is growing rapidly from 23% in 2001 to 31% in 2011.
- 4.9 The London Plan indicates that the requirement for additional homes across London is 49,000 per year. This has been calculated by the London Strategic Housing Market Assessment 2013 on the basis of household projections from 2011 to 2035 together with existing housing needs and further needs arising from undersupply of housing from 2011 to 2015. An objective assessment of housing needs for Camden has been produced on broadly the same basis (having regard to national planning practice guidance, guidance from the Planning Advisory Service and case law), and forms our target for housing supply. Camden's need is around 1,120 additional homes per year, which is equivalent to 16,800 over the plan period (2015/16 to 2030/31). This overall need relates to homes of all types including housing for specific groups such as families with children and people with disabilities.
- 4.10 The 2014 Camden Authority Monitoring Report and Housing Trajectory indicates that sites are in place to provide more than 1,300 additional homes per year from 2015/16 to 2019/20, but this reduces to 900 additional homes per year from 2015/16 to 2024/25, and just under 800 additional homes per year from 2015/16 to 2030/31.
- 4.11 The current Core Strategy sets an annual target of 595 additional homes (437 self-contained homes, 59 vacant homes returned to use and 100 non self-contained homes). The London Plan 2011 modified this target to 665 additional homes per year (500 self-contained and 165 non self-contained). Camden met the overall target and the target for self-contained homes over the period 1 Apr 2008 to 31 Mar 2013. Camden did not meet the target for non-self-contained homes over the period 1 Apr 2008 to 31 Mar 2013, or in the

individual years except for 2008/09 and 2010/11. This primarily reflects a large reduction in the number of rooms required in hostels for homeless people.

- 4.12 The Core Strategy target for affordable homes is 50% of the target for additional self-contained homes. Since 2008/09 the percentage of net affordable housing additions has fluctuated, from 49% and 51% 2008/09 – 2009/10 down to 26% and 17% 2010/11 – 2011/12. Increasing the supply of homes to meet new projections creates a significant sustainability challenge for densely developed boroughs like Camden as failure to increase the supply in line with projections would increase social polarisation and detract from the sustainability of Camden's communities.
- 4.13 Camden's Gypsy and Traveller and Travelling Showpeople accommodation assessment 2014 identified a need for up to 16 additional pitches for gypsies and travellers by 2031 (2 to 7 pitches in the first 5 years of the Plan).
- 4.14 Camden has a similar proportion of older people aged over 65 years (11%) when compared to Greater London (ONS mid-year population estimates 2011-12). Further Alterations to the London Plan indicate that the number of Londoners aged over 65 could increase by 64% from 2011-2036.
- 4.15 Three Council-owned residential care homes for older people are currently in use, two in Camden and one in Barnet. Plans are in place for a new Council-owned care home and additional extra-care housing for older people, while two existing Council homes are scheduled to close, including the one in Barnet. The Council currently provides places in private residential care and nursing homes, including places outside the borough. Some are spot-purchased to meet arising needs, others are commissioned on a longer term basis. It is anticipated that the need to spot purchase beds will be much lower by 2018, made possible through the strategy of enabling more people to stay at home, the recently opened care home at Maitland Park and the planned care home at Wellesley Road.
- 4.16 Camden is home to more higher education institutions than any other local authority area. The borough is home to the largest student population in London, with 24,300 domestic and foreign students living in Camden and attending publicly funded higher education institutions (HESA 2012/13). 31% live in University or private halls of residence. More than a third of students (42%) live in the area south of Euston Road.

*Likely evolution without the plan*

- 4.17 As the baseline demonstrates, the borough's population is set to increase, with respective growth in household numbers. Without a plan to provide homes that meet the housing needs of existing and future residents in the borough, there would most likely be negative impacts on those groups seeking affordable

accommodation and those seeking gypsy and traveller accommodation and other specialist accommodation.

### **Community and wellbeing (inc. health)**

- 4.18 Camden's Joint Strategic Needs Assessment (JSNA) 2013 describes the current and future health and wellbeing needs. The information provided in the JSNA not only covers health and social care, but includes the wider aspects of health such as poverty, employment, education, public safety, housing and the environment. The JSNA provides the evidence base for the Joint Health and Wellbeing Strategy (JHWS), which sets the health and wellbeing priorities for the borough. The draft 2015-2017 JHWS has identified three priorities:

**Healthy Lives** - extending the previous priorities of supporting action on overweight and obesity ('healthy weight healthy lives') and alcohol-related harm to include other lifestyle factors such as smoking, physical activity, drugs and sexual health, as well as the 'wider determinants of health' such as housing, employment and education, all of which are fundamental to enabling residents to have positive health and wellbeing and reducing health inequalities over the longer term.

**Mental health and wellbeing** – Camden's population experiences high levels of mental health need. There are opportunities to strengthen individual, family and community resilience to protect and promote mental health and wellbeing across the borough, as well as building upon our well-performing mental health services.

**Continuing to strengthen the integration of health and social care** – taking action to enable people with existing health problems to live life to the full, maximise their potential and to make the health and social care systems work better for them. Providing more integrated care and support will enable people to be independent, resilient and part of a community.

- 4.19 The following will outline the key information of the JSNA, including other sources, however further detail is provided in Appendix 2 of the SA Scoping report.
- 4.20 There has been a significant increase in the percentage of residents in Camden describing their health as good and very good, with the percentage of people with a limiting long-term illness decreasing from 2001 to 2011.
- 4.21 The main cause of death in Camden is circulatory (31%) followed by cancer (29%) and respiratory disease (12%).
- 4.22 The Council's 2014 Open Space review identified areas deficient in access to public parks. The list below was taken from the 2014 study:

- West – small areas of deficiency in wards of Fortune Green, Kilburn and Swiss Cottage and West Hampstead.
- Hampstead and Highgate – large deficiency areas in the centre of Frognal and Fitzjohns ward. Very small area of deficiency on the south west edge of Hampstead Town.
- Gospel Oak – small deficiency area in Haverstock ward.
- Somers Town – small deficiency area in St Pancras and Somers Town ward.
- Kentish Town – small deficiency area in Kentish Town Ward and Canteloves wards.
- Central London – small deficiency area in Holborn and Covent Garden.

4.23 The largest access deficiencies (outside 400m catchment area) for children's play provision are located in the following wards:

- West Sub area (Fortune Green / Kilburn wards)
- Belsize / Primrose Sub area (Belsize / Camden Town with Primrose wards)
- Kentish Town (Kentish Town ward)
- Central London (Holborn and Covent Garden ward)
- Gospel Oak (Haverstock ward)
- Hampstead and Highgate (Hampstead Town / Frognal and Fitzjohns wards).

4.24 There is particular pressure in the north west of the borough for primary school places and this need is expected to remain high.

4.25 The borough's mean average household income is higher than that of Greater London however, there is significant disparity between wards. The wards with the highest levels of deprivation are: St Pancras and Somers Town; Kilburn; Haverstock; Regent's Park; and Kings Cross. The baseline data shows that there is a clear socio-economic divide in the borough.

#### *Likely evolution without the plan*

4.26 In Camden it is our social, economic and environmental circumstances, which include factors such as how safe we feel in the environment, the physical condition of our housing and the wider physical environment in which we live, job security, income and education levels, that have the strongest impact on health outcomes. Without this emphasis carried through the Local Plan there will be no requirement to assess need for maintaining or increasing the current level of community facilities, such as schools and residential care. There will also be greater inequality on those groups which currently experience high levels of deprivation, as these communities would not likely harness benefits of regeneration in building sustainable communities.

### **Economy and employment**

#### *Employment land*

4.27 The Council seeks to ensure that a range of employment sites and premises are available across the borough to suit the different needs of businesses for

space and location, to support the borough's economy and competitiveness and to provide a diverse range of employment opportunities. Camden has the second largest number of businesses in London (26,400 enterprises), with Westminster having the most (47,010 enterprises). Trends in B1 floorspace vary year by year however the last 7 years have seen a net loss of B1 floorspace of approximately 61,000sq m. Most loss of B1 business floorspace is for redevelopment or conversion to housing.

- 4.28 The borough's Employment Land Review (ELR) 2014, noted that demand and supply is broadly in balance, meaning that the Council should consider protecting employment land. Although low vacancy levels were observed the survey found that there has been an erosion of employment land by residential uses. ELR forecasts demand for approximately 695,000 sqm of office floorspace for 2014 – 2031, the majority of demand being for large, high quality offices in and around King's Cross, Euston, Tottenham Court Road and Holborn. This area has few large single occupier buildings and has low vacancy, so new demand will have to be met in the Opportunity Areas and Growth Areas.
- 4.29 ELR demand forecasting for 2014 – 2031 found that Camden is expected to see a contraction in demand for industrial and warehousing of 2.2 ha, where the quantity of sites and premises has undergone long term decline and their provision has not been renewed. The decline of sites for industry and warehousing is further exacerbated by the pressure of competing land uses, such as housing. However, demand for CAZ support services is more likely to grow than decline. There is also demand for 'clean' industries that serve the expanding central London market and could attract more if the right type of space is available.

#### *Town centres and shopping*

- 4.30 The current plan seeks to maintain an appropriate level of services across the borough and protect the vitality of existing centres for shopping and services. The proportion of retail (Use Class A1) in protected frontages of the borough over the period 2007 to 2013 changed from 47% to 43%, representing a net reduction in 156 A1 shops. The proportion of food, drink and entertainment uses over the period 2007 to 2013 increased from 18% to 21%, a net increase of 121 premises. This is reflective of national trends, with similar contributing factors of the economic downturn, increasing consumer mobility, increasing market share of large retailers and increasing online sales. Despite this, in 2013 Camden experienced a reduction in vacant premises on Camden's protected shopping frontages, contrary to the national and London wide trends of increasing vacancy rates.

### *Unemployment*

- 4.31 The claimant count unemployment rate for Camden is below average when compared with Greater London and the national average. However the claimant count rates for Camden have been increasing since the SA of the Local Development Framework 2008. In November 2013 Camden had a total of 1,295 (33%) claimants over 1 year. 95 (14%) of those claimants were young persons aged 16-24. There is also significant disparity between different wards in Camden, in that some wards rank very high in unemployment, whereas others rank very low, showing a clear socio-economic divide.

### *Likely evolution without the plan*

- 4.32 Without a local plan to protect and promote Camden's shopping frontages, other key employment/growth areas and the Central Activities Zone it is likely that the level of our employment sector lost to housing would be harmful (due to the difference in land use values). It is also likely that where there is growth in the borough, the Council would not be able to harness opportunities for local residents which would further increase inequalities experienced at ward level.

### **Built heritage and landscape**

- 4.33 Much of the borough is covered by conservation area designations, 40 in total, and each of these has a distinct character that requires protection. Currently there are no conservation areas being identified as at risk. The number of conservation area designations in the borough has not increased since the publication of the LDF. A Local List, which identifies historic buildings and features that are valued by the local community, was adopted in January 2015.
- 4.34 There are 5645 buildings or structures in the borough that have been listed by Historic England as having special architectural or historical interest. Since 2010 the number of heritage buildings at risk has been reduced by 13.
- 4.35 A Character Study has been undertaken for the borough to identify and describe the character typologies that inform local distinctiveness. The Study identifies opportunities for improvements in each of the character areas (excluding conservation areas), the main areas for opportunity are: Finchley Road corridor, land west of Kentish Town Centre, Gospel Oak, Camden Road, and Camley Street/St Pancras Way.

### *Likely evolution without the plan*

- 4.36 The Council has been very successful in preserving and enhancing its built heritage and landscape. It is recognised that there is a need to improve the sustainability (energy performance) of the borough's existing stock and that Camden also seeks to promote growth in the borough. Without a plan in place to ensure that our heritage assets and unique landscape is preserved and

enhanced the risk is that Camden's built heritage and landscape would erode over time and that such change would be irreversible.

### **Air quality air pollution, noise, climate factors**

- 4.37 The borough has been very successful to date in reducing the amount of traffic using the borough's roads. In the ten year period to 2012 the level of traffic in Camden reduced by 25%. There has been an increase in the proportion of people walking, cycling and using buses. Defra have identified 40 noise hot spots (which are generally along busy roads) in Camden and 20 of these are on TfL roads.
- 4.38 Camden has some of the poorest air quality in Europe especially in the south of the borough where traffic congestion is severe. Since 2000, the whole borough has been designated as an Air Quality Management Area. The annual change in carbon emissions from 2005 to 2011 is - 11% in Camden and - 10% in Greater London. Other measured sources of pollution in Camden are Nitrogen Dioxide and Particulate Matter 10 which arise from traffic, boilers and other sources. Long term trends reveal that Camden continues to breach the annual mean air quality objective for nitrogen dioxide, although concentration levels at three of the four automatic monitoring sites decreased between 2010 and 2011, it is too early to tell if this represents a downward trend. The Greater London Authority (GLA) reported that in 2008 107 deaths in Camden were attributable to PM2.5.

#### *Likely evolution without the plan*

- 4.39 Without further action to address the sources of air pollution in Camden through the Local Plan we will not be able to ensure that development does not worsen and mitigates poor air quality, particularly in the worst affected areas south of the Euston Road. The increase of renewable energy sources in the borough such as biomass boilers and Combined Heat and Power (CHP) has serious implications for air quality and such systems would not be appropriately managed if there were no policy in place to ensure that air quality is taken into consideration.

### **Efficient land use and soil**

- 4.40 There are currently no sites in the borough that are designated as contaminated land for the purposes of it should be Part II A Environmental Protection Act 1990. However, it is considered that significant parts of the borough are potentially contaminated owing to the extent of previous industrial uses.
- 4.41 In Camden there are land use pressures and conflicts between uses, particularly the demand for higher value housing development and the potential threat this creates for employment generating land uses and other

uses. The only land that has not been previously developed are parks and open spaces. There have been no losses in designated open space since 2009 when two small schemes recorded a collective loss of around - 2,500sq m which was largely mitigated by a land swap. In 2012/13 one scheme was permitted that involved development on designated open space, this was the development of Gondar Gardens that was allowed on appeal (2011/0395/P).

#### *Likely evolution without the plan*

- 4.42 Given the extent of potential contamination across the borough it is important that the Council continues to require development on potentially contaminated land to carry out site investigation. Without a plan in place to ensure that growth areas/previously developed sites are the focus for development, our parks and open spaces in the borough would risk being built upon.

#### **Water**

- 4.43 While Camden is not at risk of flooding from rivers or the sea, there are approximately 38,800 properties in Camden within areas at risk of surface water flooding at potential depths of >0.1m, and 12,700 properties in areas at risk of flooding to potential depths of >0.3m. In August 2002, widespread surface water flooding occurred in the north of the borough in West Hampstead and Kentish Town. The topography and densely populated nature of the borough means that high rainfall and associated flooding events could be serious in Camden.
- 4.44 Areas considered at risk of flooding in the borough are: Local Flood Risk Zones and previously flooded streets. Camden's Strategic Flood Risk Assessment (2014) identified Critical Drainage Areas, where multiple, interlinked sources of flood risk exist, cause flooding in one or more Local Flood Risk Zones (LFRZ's) during severe weather. There are twelve LFRZ's in Camden, these are: York Rise; Gospel Oak; Maitland Park; Frogna Lane; Cannon Hill; Sumatra Road; Kingsgate; Goldhurst; Primrose Hill; Kings Cross; South East Regent's Park; and North Swinton Street. A detailed map of these areas is provided in the SFRA.
- 4.45 Camden also has a small risk of groundwater flooding. The risk of this type of flooding is hard to model but has been recorded in parts of the borough, notably Kilburn, Fortune Green and West Hampstead, and will need to be considered and mitigated against in any new development. Aquifer based groundwater flooding is relatively rare in Camden, but it is possible in areas around Hampstead Heath and in the very south of the borough.
- 4.46 Thames Water identified that the south east of the borough discharges storm flow into the highly sensitive Counters Creek drainage catchment, where flooding to property already occurs. Changes in land use and rising population

in this catchment area has resulted in larger volumes of water entering the system.

- 4.47 The Environment Agency noted that Camden has Groundwater Source Protection Zones. The inner zone is located within the south west of Primrose Hill Park and the outer zone covers a section of South Hampstead from Prince Albert Road to Swiss Cottage. These zones are to signal that there are likely to be particular risks posed to the quality or quantity of water obtained, should certain activities take place nearby.
- 4.48 Camden has five reservoirs, four of which are currently in use for storing drinking water (Barrow Hill, Hampstead Heath, Kidderpore and Highgate). Camden is in Thames Water's London Water Resource Zone, which is classified as being 'seriously water stressed.' Currently water use accounts for 27 percent of all carbon emissions from our homes. In London non-households account for 29 percent of water consumption.
- 4.49 The Environmental Agency reported both Camden's part of the Grand Union Canal and the Regent's Canal as having moderate water quality. The Regent's Canal failed to reach 'good' status as mitigation measures were not yet in place.

*Likely evolution without the plan*

- 4.50 The increases of population growth projected together with economic growth in the borough will likely place a greater strain on existing, stressed, water supply. Without measures to ensure that we promote water efficiency measures in existing and new development, the issue will only be exacerbated and not mitigated against.
- 4.51 Furthermore, without directing development from areas more susceptible to flooding, or encouraging measures to improve drainage the borough would be at a greater risk from localised surface water flooding.

**Biodiversity, open space, green infrastructure**

- 4.52 Camden has over 527 hectares of parks and open spaces. The areas of greatest deficiency in access to public parks are identified in paragraph 4.18 above.
- 4.53 There are 4.56 hectares of sites that are designated for nature conservation. There is 1 Site of Special scientific Interest; 5 sites of Metropolitan Importance, 7 sites of Borough Importance Grade 1 and 9 Grade 2 sites, 15 Sites of Local Importance and four Local Nature Reserves.
- 4.54 Camden has small areas of UK Biodiversity Action Plan priority habitats (habitats that are nationally important) including acid grassland and heathland. From the Camden Biodiversity Audit (GiGL, 2012) and stakeholder

engagement, key species were identified for priority within the Camden Biodiversity Action Plan (BAP). The priority species were identified as: bats, hedgehog, butterflies, house sparrow, swift, bees, slow worm and stag beetle. The audit also recognised the following key habitats; these are green corridors, green roofs, public parks / amenity grass, private gardens, hedges, housing estates, acid grassland, ponds and standing water, wetlands, canal, orchards, woodland, meadows, roadside verges, and brownfield land.

*Likely evolution without the plan*

- 4.55 As indicated above, the borough faces the pressures of population growth and development and the only sites that have not been previously developed are our parks and open spaces, which if left unprotected by planning policy would surely be developed. We also need to ensure that priority species and habitats identified in Camden's Biodiversity Action Plan do not decline further and receive adequate protection in the planning process.
- 4.56 Furthermore, growth in the borough places further pressure on our open spaces so they need to either be improved and/or increased.

**Waste**

- 4.57 The last ten years have seen a general trend of reducing volumes of waste and increasing recycling rates, despite population growth. The total municipal waste arising for Camden 2011/12 was 110,890 tonnes and the amount recycled was 21,274 tonnes. In 2012/13 30.91% of household waste was recycled.

*Likely evolution without the plan*

- 4.58 The Council is working closely with six other North London Authorities to set a planning framework for waste management for North London. Without a commitment in the plan for reducing the borough's proportion of waste going to landfill and promotion of the North London Waste Plan, it would prove difficult for the Council to meet targets for waste.
- 4.59 The borough continues to favour retention over demolition and innovative sustainable construction methods which help to contribute towards reducing carbon dioxide emissions in the borough. Without strong policies to ensure this continues the impact on reducing carbon dioxide emissions is likely to decline.

**Sustainability issues and objectives**

- 4.60 The following table presents the sustainability issues and objectives established through SA scoping, which were developed following the review of relevant plans and programmes and baseline collection and presented in the Interim SA. Issues and objectives are grouped under sustainability topic headings which set out the framework for the appraisal. Some SA objectives

may be repeated in the table as they relate to more than one specific topic area. For SA objective criteria please refer to Appendix B.

Table 2. Sustainability topics, issues and objectives

**Topic 1 - Housing**

SA Objectives	Issues
<p>1 - To promote the provision of a range of high quality and affordable housing to meet local needs.</p>	<p>The cost of buying a home in Camden is 13.7 times higher than the average income.</p> <p>Market rents in Camden are around 30% higher than across London (London Rents Map Dec 2013).</p> <p>12.5% of Camden households were found to be overcrowded in the 2011 Census based on bedrooms. 20% of Camden households in social rented accommodation were overcrowded on the same basis.</p> <p>Camden has a similar proportion of people aged over 65 to Greater London (11%), but lower than the national average for England and Wales (17%) (ONS mid-year population estimates 2011-2012). However, Draft Further Alterations to the London Plan indicate that the number of Londoners aged over 65 could increase by 64% from 2011-2036.</p> <p>24,300 students live in Camden and are enrolled at publicly funded higher education institutions, and 42% of higher education students in Camden live in the three wards south of Euston Road (HESA 2012-13).</p> <p>Up to 16 gypsy and traveller pitches required by 2031 Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014) (2 to 7 pitches in the first 5 years of the Plan).</p>
<p>8 - To ensure new development makes efficient use of land,</p>	<p>An objective assessment of housing need for Camden has been produced on the same basis as the London Strategic Housing Market Assessment, and shows an annual need</p>

buildings and infrastructure.	<p>1,120 additional homes per year in Camden, equivalent to a total of 16,800 from 2015/16 to 2030/31 (includes housing for specific groups).</p> <p>The 2014 Camden Authority Monitoring Report and Housing Trajectory indicates that sites are in place to provide more than 1,300 additional homes per year from 2015/16 to 2019/20, but this reduces to 900 additional homes per year from 2015/16 to 2024/25, and just under 800 additional homes per year from 2015/16 to 2030/31.</p>
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## Topic 2 – Community and wellbeing (Inc. health)

SA Objectives	Issues
<p>2 - To promote a healthy and safe community.</p> <p>10 – To improve amenity by minimising the impacts associated with development</p>	<p>An increasing proportion of Camden residents are describing their health as good or very good. The major causes of death in Camden are circulatory disease, cancer and respiratory disease. There is an important link between the environment where we live and how healthy we are.</p> <p>Although Camden has seen the greatest reduction in overall crime compared with all London boroughs, maintaining this reduction has become increasingly difficult - current figures show a 7% increase over the past twelve months.</p> <p>Defra has identified 20 'important areas' (noise hotspots) on Camden highways of which 5 are first priority locations (noisiest ones).</p> <p>The number of noise complaints has decreased but remains an important issue in terms of amenity, health and wellbeing.</p>

### Topic 3 – Economy and employment

SA Objectives	Issues
5 - To encourage and accommodate sustainable economic growth and employment opportunity.	<p>There is significant disparity between different wards in Camden, as shown in deprivation indices, also some wards in Camden rank very high in unemployment, whereas others rank very low.</p> <p>Land use pressures and conflicts between uses, particularly the demand for higher value housing development and the potential threat this creates for employment generating land uses and other uses.</p>
6 - To maximise the benefits of regeneration and development to promote sustainable communities.	<p>The need for school places in the north-west of the borough (particularly west of the Finchley Road) continues and is expected to remain high. It is important to provide for a supply of education facilities to meet the needs of existing and future residents.</p> <p>It is important that regeneration objectives for Kings Cross and Euston and other significant developments harness the benefits of economic growth and contribute to reducing inequalities and ensure that adverse impacts are avoided or at least mitigated.</p>
3 - To ensure access to local shopping, community, leisure facilities and open space.	<p>There is a need to provide additional space for retail in line with the London Plan and the Camden Retail and Town Centre Study 2013.</p> <p>There is a need to respond to challenges in town centres, including changes in consumer behaviour, new retail models, the growth in online shopping, and competition from out of centre retail development.</p>
4 - To tackle poverty and social exclusion and promote equal	<p>There is significant disparity between different wards in Camden, as shown in the indices of deprivation, showing a clear economic divide.</p>

SA Objectives	Issues
opportunities.	The following five are the most deprived wards in Camden in terms of the levels of education skills and training: St Pancras and Somers Town, Haverstock, Regent's Park, Kilburn and Kings Cross.

#### Topic 4 – Built heritage and landscape

SA Objectives	Issues
<p>7 i - To promote high quality and sustainable urban design</p> <p>7 ii – To protect and enhance the historic environment</p>	<p>Development and protection of Camden's historic environment (40 conservation areas, 5645 listed buildings, 13 archaeological Priority Zones and 1 ancient monument) and those on the Council's Local List.</p> <p>Our built heritage should be conserved and enhanced. Poor development in such areas can significantly harm their character and appearance.</p> <p>The need to reduce carbon emissions and make improvements to the sustainability of existing stock will be challenging – in achieving retrofitting measures that does not cause harm to heritage assets.</p>

#### Topic 5 – Efficient land use and soil

SA Objectives	Issues
8 - To ensure new development	Land use pressures and conflicts between uses, particularly the demand for higher value

<p>makes efficient use of land, buildings and infrastructure.</p>	<p>housing development and the potential threat this creates for employment generating land uses and other uses -how we use our limited land?</p> <p>Significant parts of the borough are potentially contaminated owing to the extent of previous industrial uses across the borough - which may pose contamination problems for future development of sites.</p>
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### Topic 6 – Air quality (incl. transport)

SA Objectives	Issues
<p>9 - To reduce reliance on private transport modes and enhance permeability for non-motorised travellers.</p>	<p>Whilst traffic in Camden has decreased significantly, it is important that this trend continues as it helps to reduce carbon emissions and improve air quality.</p> <p>The number of people killed or seriously injured in road accidents has not improved significantly from 2007 – 2011.</p>
<p>14 - To improve air quality.</p>	<p>Parts of Camden have some of the poorest air quality in London.</p> <p>Camden continues to breach annual mean air quality targets for nitrogen dioxide.</p> <p>Road transport, energy generation and the operation of some industrial processes contribute to air pollution in the borough.</p>

### Topic 7 – Climate change

SA Objectives	Issues
15 - To provide for the efficient use of energy.	<p>Factors outside our control in reducing carbon emissions such as the risk of higher energy demand from extremes in weather and the decarbonisation of the national grid.</p> <p>In Camden, over 25% of the boroughs CO2 emissions result from heating and powering homes – issue is encouraging energy efficiency improvements to existing stock.</p>
16 - To minimise the use of non-renewable resources.	Construction processes and new materials employed in developing new buildings are major consumers of resources and produce large quantities of waste in the borough.

### Topic 8 – Water

SA Objectives	Issues
11 - To protect and manage water resources and reduce surface water flood risk.	<p>Approximately 38,800 properties in Camden are within areas at risk of surface water flooding.</p> <p>The topography and densely populated nature of the borough means that high rainfall and associated flooding events could be serious in Camden.</p> <p>The moderate status (water quality) of Regent's canal has not improved due to mitigation measures not yet in place which would make the watercourse more natural.</p>

	London is classified as 'seriously water stressed' (high population with high water demands and limited water availability – it does not reflect water companies ability to supply water).
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### Topic 9 – Biodiversity and open space

SA Objectives	Issues
12 - To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	Priority species for protection in Camden are: bats, hedgehog, butterflies, house sparrow, swift, bees, slow worm and stag beetle.
3 - To ensure access to local shopping, community, leisure facilities and open space.	There is a significant shortage of land available for development and therefore limited scope for creating new open space.

### Topic 10 - Waste

SA Objectives	Issues
13 - To reduce the amount of waste requiring final disposal.	The projected increase in the borough's population will place increased pressure on existing waste management facilities.

## **5. Testing the Local Plan objectives against the SA framework**

- 5.1 A series of objectives were developed for the draft Local Plan to deliver the vision for Camden. These objectives underpin the more detailed Plan policies.
- 5.2 Local Plan objectives have been subjected to appraisal, with the aim of refining them so as to minimise conflicts and maximise synergies. Appraisal of plan objectives has also helped to inform drafting of policies, and the appraisal of emerging policies (and alternatives).
- 5.3 The table below presents an appraisal of the objectives as they stand at the current time, and also explains how objectives have been refined along the course of the plan-making / SA process.
- 5.4 N.B. In response to a comment made by Historic England on the Interim SA Report, SA objective 7 has split so as to separately address design and heritage considerations.

Table 3. Testing the compatibility of Sustainability Appraisal objectives with Local Plan objectives

Key: + compatible  
 - not compatible  
 0 no relationship  
 ? uncertain

SA objectives →	1. Housing	2. Healthy communities	3. Community facilities	4. Poverty and social exclusion	5. Economic growth	6. Sustainable communities	7. i Design 7. ii Heritage	8. Efficient use of land	9. Transport	10. Amenity	11. Water	12. Open space and biodiversity	13. Waste	14. Air quality	15. Energy	16. Resources
Local plan objectives ↓																
i. Creating conditions for growth and harnessing its benefits	+	+	+	+	+	+	?	+	+	-	0	0	+	-	0	0
<p>Seeks to ensure that growth will take place in the most appropriate locations and that the benefits of growth are secured to meet the needs of Camden's communities. This plan objective particularly supports the following SA objectives: housing; healthy communities; sustainable communities; design; heritage; and the efficient use of land.</p> <p>Increased proportion of growth in the borough will however, undoubtedly have impacts on general amenity and air quality. The objective needs to be revised to highlight this issue.</p> <p>Considering that the objective is about growth in the borough, the objective does not make specific reference to sustainable locations for growth or amenity which may be unduly impacted. The plan objective has therefore been revised to include reference to these matters.</p>																

ii. Healthy communities	0	+	+	+	0	+	0	0	0	+	0	0	0	0	0	0
<p>Seeks to secure mixed and balanced communities and ensuring the provision of facilities and services meet communities needs. This plan objective particularly supports the following SA objectives: healthy communities; community facilities and sustainable communities.</p> <p>The plan objective does not mention accessibility of services and facilities for all communities nor does it make reference to safety. The plan objective has been revised to include reference to these matters.</p>																
iii. Housing	+	0	0	+	0	+	?	?	+	0	0	0	0	0	0	0
<p>Seeks to provide homes that meet housing needs of existing and future residents. This plan objective particularly supports the following SA objectives: housing and sustainable communities.</p> <p>This objective is primarily focused on housing in terms of meeting housing needs and quality of housing in Camden. The objective has been revised to highlight that self-contained housing will be the priority of the Local Plan.</p>																
iv. Economy	0	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0
<p>Seeks to strengthen Camden's economy, support growth and ensures that local people benefit through increased access to jobs, training and education facilities. This plan objective particularly supports SA objectives: poverty and social exclusion; economic growth and sustainable communities.</p> <p>Whilst this objective is primarily focused on Camden's economy it is also focused on ensuring that local people do not get left behind. The objective has been revised to take account of the knowledge economy sectors in Camden.</p>																
v. Town centres and	0	0	+	0	+	+	0	?	0	0	0	0	0	0	0	0
<p>Supports the success of Camden's town and neighbourhood centres and the retail areas of Central London. This plan</p>																

shopping	<p>objective particularly supports SA objectives: community facilities and economic growth.</p> <p>Specific reference is needed as to the future development/growth in Camden's retail centres. The plan objective has been revised to take account of this.</p>															
vi. Growth areas	+	+	+	+	+	+	0 ?	+	+	0	0	0	0	0	0	0
vii. Design and heritage	<p>Seeks to promote and support the development of Camden's growth areas and ensure that development is supported by necessary infrastructure. This plan objective particularly supports SA objectives: sustainable communities; economic growth and the efficient use of land.</p> <p>Specific reference is needed to Central London. The plan objective has been revised to take account of this.</p>															
viii. Sustainable transport	0	+	+	0	0	0	0	0	+	0	0	0	0	+	+	0
	<p>Promotes high quality, safe and sustainably designed buildings, places and streets, whilst preserving Camden's unique and historic character. This plan objective particularly supports SA objectives: design; heritage; energy; and resources.</p> <p>Increased proportion of growth in the borough will have pressures on Camden's built and historic environment. Local plan policies will address these potential effects.</p>															
	<p>Promotes sustainable modes of transport, reducing reliance on private cars and support new and improved transport links. This plan objective particularly supports SA objectives: community facilities; transport; air quality and energy.</p> <p>The objective should mention accessibility for all public transport. The plan objective has been revised to take account of this.</p>															

ix. Climate change	0	+	+	0	0	0	+/? -/?	+	+	0	+	0	0	+	+	+
<p>Seeks to ensure that development in Camden minimises its energy use and is designed to mitigate against and adapt to the effects of climate change. This plan objective particularly supports SA objectives: design; air quality; energy and resources.</p> <p>Potential conflict with SA objective 7 ii where some climate change mitigation and adaptation measures may not be suitable on heritage grounds. Local guidance on this topic area is already published, and further detail will be needed in the policy.</p> <p>The objective is primarily focused on minimising energy use however there is no mention of local energy generation/supply of an efficient energy supply. The plan objective has been revised to take account of this.</p>																
x. Open space and biodiversity	0?	+	+	0	0?	+	+ +	0	+	0	+	+	0	+	0	0
<p>Seeks improvements to and protection of Camden's MOL, parks and open spaces as well as enhancing the borough's biodiversity. This plan objective particularly supports the following SA objectives: community facilities; sustainable communities; design; heritage; open space and biodiversity; and air quality.</p> <p>Taking into consideration SA objectives, the plan objective could be strengthened to include: new habitats and additional open space, and replacement with the word promote to protect. The plan objective has been revised to take account of these matters.</p>																
xi. Health and wellbeing	+	+	+	+	0	+	0 0	0	+	+	0	+	0	+	+	0
<p>Seeks to promote healthier lifestyles and support improvements to reduce health inequalities in the borough. This plan objective particularly supports the following SA objectives: housing; healthy communities; community facilities; poverty and social exclusion; sustainable communities; transport; amenity; open space and biodiversity and air quality.</p>																

	Specific reference should be made to improved facilities that promote/enable healthy living. The plan objective has been revised to take account of this.															
xii. Amenity	?	+	+	+	?	+	+ 0	?	+	+	0	+	0	+	+	0
	The plan objective seeks to protect amenity and quality of life which makes Camden an attractive place to live. This plan objective particularly supports the following SA objectives: housing; poverty and social exclusion; design; amenity, open space and biodiversity; and air quality.															
xiii. Planning for waste	0	0	0	0	0	0	0 0	+	0	0	0	0	+	0	0	+
	The plan objective seeks to reduce, plan for and manage waste, including working with neighbouring boroughs to work towards self-sufficiency. This plan objective particularly supports SA objectives: efficient use of land; waste; and minimise the use of non-renewable resources.															



## 6. Appraising alternative options

### Introduction

6.1 The SEA Directive requires that consideration is given to alternative approaches (options) to addressing key plan issues, with a view to informing selection/development of the preferred approach. Specifically, the Regulations make reference to the assessment of 'reasonable alternatives'.

6.2 The interim SA report presented an appraisal of alternatives for the following key policy issues:

Affordable sliding scale	Advertisements
Affordable housing tenure	Basements
HMO's	Local Green Space
Mix of house sizes	Public open space
Housing as priority use	Car parking
Student housing	Pubs
Employment land and buildings	Town centres
Industrial areas	

6.3 This list of issues was established on the basis that each offered an opportunity to explore policy alternatives, with a view to best addressing locally specific issues and contributing to delivery of Camden's Local Plan.

6.4 Other policy topics besides those listed above could potentially have been the focus of alternatives appraisal, but were not on the basis that it was unclear what value would be added. For many topics it is proportionate to develop a preferred policy approach on the basis of the direction set by higher level policy, technical work and consultation, without formal alternatives appraisal.

6.5 At the current time, it remains the case that it is appropriate to present information on alternatives in relation to this same list of policy issues. No further topics have emerged since January 2015 as necessitating alternatives appraisal.

### Structure of this chapter

6.6 Each of the policy issues listed above is considered in turn below. In each instance the aim is to present:

- the reasons for focusing appraisal on this issue/set of alternatives;
- summary of appraisal findings;
- summary of appraisal findings are presented below, with detailed appraisal findings presented in Appendix C of this report.
- the reasons for selecting the preferred approach, in light of appraisal.

## Affordable housing sliding scale

### Outline reasons for focusing appraisal on this policy issue / set of alternatives

- 6.7 The ratio of median house prices to median earnings for Camden in 2012 was 13.7 (i.e. median house prices are 13.7 times median earnings), in 1997 this was 6.65. Camden has a particularly large requirement for additional affordable homes, estimated by the Camden SHMA to be around 10,000 homes for the 15-year Plan period. The SHMA estimates that over the plan period, 60% of the overall need for additional homes is for affordable housing.
- 6.8 The Camden Local Plan Viability Study has assessed the cumulative impact of local plan policies along with costs arising from Camden's Community Infrastructure Levy (CIL) and S106 requirements, and recommended adoption of a 50% affordable housing target. This target would not meet the need estimated by the SHMA.
- 6.9 Current Development Policy DP3 seeks to ensure that all developments with the capacity for 10 or more dwellings should contribute to affordable housing in Camden. To enable the delivery of affordable housing in Camden the LDF adopted a sliding scale to affordable housing contributions – the 50% target, subject to financial viability will apply for schemes with capacity for 50 additional homes (or 5,000 m<sup>2</sup> gross additional floorspace), but for smaller schemes the sliding scale applies - 10% for 10 additional homes (or 1000m<sup>2</sup> gross of additional floorspace), 20% for 20 homes/ 2000m<sup>2</sup>, 35% for 35 homes/3500m<sup>2</sup> etc.
- 6.10 Since consultation of the draft Local Plan and Interim SA the affordable housing threshold, set by government, no longer exists. As such the Council is now able to set its own threshold.
- 6.11 The following alternatives have been subject to appraisal:
- 1: Retain existing approach (i.e. sliding scale applies from 10 to 50 additional homes)
  - 2: Retain a sliding scale but condensed so that the maximum target applies to smaller schemes i.e. a steeper scale
  - 3: Set a flat affordable housing percentage target regardless of scheme size i.e. no sliding scale

These alternatives were the focus of appraisal in January 2015. As the affordable housing threshold no longer applies Option 2 has been appraised to consider the effects of a steeper affordable housing target applying from 1 to 25 additional homes.

## Summary of assessment findings

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.12 Option 1 seeks to continue the existing policy approach. It is likely to provide affordable housing without reducing overall affordable housing delivery so Option 1 is likely to have minor positive impacts on objectives relating to housing, poverty (social exclusion) sustainable communities and vacant land (efficient development density).
- 6.13 Option 2 seeks to retain a sliding scale but with higher affordable housing targets for smaller schemes than is currently the case. It is likely to provide more affordable housing, but there is some risk that it would not work by reducing the number of homes coming forward on small sites and the overall housing delivery and density. Balancing these factors, Option 2 would have a major positive impact on poverty (social exclusion), but only minor positive impacts on objectives relating to housing and sustainable communities.
- 6.14 Option 3 involves a flat percentage target of affordable housing for schemes of all sizes, which would theoretically deliver more affordable homes but creates a serious risk of failure through a reduction in homes on small sites and overall delivery. The emphasis on affordable housing could produce a major positive impact on poverty (social inclusion). Balancing the potential for more affordable housing against the risks of reducing housing on small sites, Option 3 is likely to have a minor positive impact on the objectives relating to sustainable communities (wellbeing and local people's housing needs), but a neutral impact on housing (more affordable housing at the expense of an overall reduction), and a minor negative impact on the vacant land objective (efficient development density).

## Outline reasons for selecting preferred approach in light of alternatives appraisal

- 6.15 The preferred approach, in the consultation draft Local Plan was to progress Option 2 subject to financial viability. As option 2 was considered the most practical option for maximising affordable housing delivery without reducing the number of homes on small sites and the overall housing delivery.
- 6.16 The preferred approach in the Local Plan Submission draft remains option 2, where a steeper sliding scale to 50% affordable housing target will apply. As the national affordable housing threshold, set by government, no longer exists the Council is now able to set its own threshold. Given the significant need for affordable housing in the borough the preferred approach is to set the affordable housing threshold at 1, additional home (or 100sqm), with a target for a 2% contribution, and every further home added (or 100sqm) would add

2% to the contribution sought (to a maximum 50% target). Sites that provide between 1-9 units will be expected to provide payments towards affordable housing and those of 10 or more will continue to deliver affordable housing on-site. This approach is expected to achieve more contributions and affordable housing than the existing policy approach.

### Affordable housing tenure

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.17 Intermediate housing (between the cost of social rented housing and market housing) has potential to retain middle income households in Camden and lessen social polarisation. However, intermediate housing has limited potential to meet the needs of households who are unable to afford market rents. Camden SHMA shows that only 15% of households needing affordable housing could afford an affordable rent set at 80% of median market rent, and that a 40% equity share in shared ownership (based on a 30 year mortgage at 6.25% interest, rent at 1.5% of retained equity annually and service charge £10 pw) would cost more than median market rent for all dwelling sizes except one-bedroom. The London Plan uses a 60-40 (social affordable/intermediate) split. This balance is also thought to reflect Members' emphasis on those most in need alongside a growing concern for the 'excluded middle' (as expressed through the Equality Taskforce).
- 6.18 A split more heavily weighted to social-affordable rent would better fit with the longstanding priority that the Council has placed on those in greatest affordable housing need, but would reduce the overall viability of development.
- 6.19 A split giving higher weight to intermediate housing would assist the viability of the social-affordable rent element, but would add to the difficulty of ensuring that intermediate housing can be provided at costs within the Mayor's income caps.
- 6.20 The following alternatives have been subject to appraisal -
- 1: Current affordable tenure split – tenure guideline of 60% social-affordable rent/ 40% intermediate housing;
  - 2: Higher proportion of social-affordable eg tenure guideline of 70% social-affordable rent/ 30% intermediate housing;
  - 3: Higher proportion of intermediate eg tenure guideline of 50% or 40% social-affordable rent/ 50% or 60% intermediate housing.

These alternatives were the focus of appraisal in January 2015.

### Summary of assessment findings

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.21 Option 1 would be likely to have a minor positive impact on objectives relating provision of housing/ affordable housing and poverty (social inclusion).
- 6.22 Option 2 would be likely to have a major positive impact on poverty (social inclusion) because it increases the proportion of housing for social-affordable rent, but minor negative impacts on provision of housing (due to reduced viability) and economic growth (as there would be less housing suitable for workers on medium incomes).
- 6.23 Option 3 would increase the proportion of intermediate housing and would be likely to have a major positive impact on objectives relating to housing/ affordable housing due to increased viability, and a minor positive impact on economic growth objectives as there would be more housing suitable for workers on medium incomes. However this option would be likely to have a major negative impact on poverty (social inclusion) objectives due to the reduced supply of homes for social-affordable rent.
- 6.24 All options involve seeking a range of different tenure types and so are assessed as likely to have a neutral impact on sustainable communities (housing for local people).

### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

- 6.25 The preferred approach, as set out in the Local Plan Submission draft, is to progress Option 1. On the basis of the assessment findings, Option 1 avoids negative impacts on housing/affordable housing delivery by maintaining viability and avoids negative impacts on poverty (social inclusion) by maintaining an emphasis on social-affordable rented housing.

### **Houses in multiple occupation**

### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.26 There is now a new Use Class C4 which covers small HMOs with 3-6 occupiers, introduced in 2010. Properties in this Use Class enjoy a right under the General Permitted Development Order to change to a self-contained home in Use Class C3. Consequently there is less scope to protect HMOs through planning policy than when the current policy (DP9) was drafted.

6.27 In planning appeals against the loss of HMOs it is often argued that modern tenants expect to have exclusive access to all the amenities they need behind a lockable front door. There are some indications that the number of HMOs formally divided into separate bedsits has declined, but that more households are made up of unrelated adults living in a shared house or flat. On the basis of the Camden Private Housing Conditions Survey 2004, the LDF estimated that there were 950 shared dwellings divided into bedsit rooms. The 2011 Census identified 700 homes in the borough that were shared by separate households, providing homes for over 3,000 individuals or households in total. However, the 2011 Census also identified over 13,000 multi-adult households living in Camden, of whom over 8,000 lived in private rented homes.

6.28 The current approach may therefore not fully reflect contemporary planning legislation and housing aspirations.

6.29 The following alternatives have been subject to appraisal -

1: Continue to protect existing HMOs

2: Allow HMOs to be converted to self-contained housing

These alternatives were the focus of appraisal in January 2015

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

6.30 Option 1 would potentially protect small bedsits maintaining the overall supply of low rent homes and benefitting low income groups, with a positive impact on housing and poverty objectives.

6.31 Option 2 would potentially reduce the availability of housing to low income groups as rents rise with improvements to stock and some bedsits are combined to family homes, producing a negative impact on poverty objectives.

### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

6.32 The preferred approach, as set out in the Local plan Submission draft, is to progress Option 1. The 2011 Census indicates that over 20% of Camden's usual residents live as separate households in shared dwellings or as multi-adult households that are not families (HMOs). Although the changed permitted development rights provide for change from C4 to C3 for HMOs occupied by 6 or fewer people, the policy will still operate where there are more than 6 occupiers or the permitted development right has been withdrawn e.g. through a planning condition on a new HMO. Given the proportion of the

population who need to live in shared accommodation due to high housing costs, the Council considers it reasonable to maintain the availability of those HMOs that it can control.

### Mix of house sizes

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.33 The Council has prioritised large homes in the affordable sector for many years because our social housing stock is skewed towards 1 bedroom and 2-bedroom homes. This skew to small homes is reflected in high levels of overcrowding. The priority for market homes has changed over time, shifting from a priority for large homes (3-bed plus) before 2010 to a priority for 2-bed homes after 2010.
- 6.34 The Camden SHMA indicates that the predominant need for affordable housing from 2016-2031 will be for 2-bedroom and 3-bedroom homes, but there will also be sizeable need for larger homes (4-bed plus). The Camden SHMA also indicates that the predominant need for market housing from 2016-2031 will also be for 2-bedroom and 3-bedroom homes, but the next biggest need will be a modest need for 1-bedroom homes.
- 6.35 There are concerns that large market housing in Camden is only affordable to those with very high incomes, so seeking large market homes increases social polarisation. Freedom for the developers to build the market housing sizes that generate the greatest market return could help us to maximise affordable housing provision.
- 6.36 The following alternatives have been subject to appraisal -
- 1: Continue to seek a mix of large and small homes in developments, but provide greater flexibility to vary the mix.
  - 2: Allow the market to operate freely to respond to demand for market homes of different sizes and specify affordable housing priorities only.
- These alternatives were the focus of appraisal in January 2015

#### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.37 Option 1 would be likely to have a minor positive impact on objectives relating to housing, poverty (social cohesion) and sustainable communities (local people).

6.38 Option 2 would be likely to have a minor negative impact on objectives relating to housing, poverty (social cohesion) and sustainable communities (local people), through the provision of housing that meets the needs of wealthier people rather than needs of the wider population. However, there would be a minor positive impact on efficient use of land and buildings (vacant land).

#### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

6.39 The preferred approach, as set out in the Local Plan Submission draft, is to progress Option 1, continuing to seek a mix of large and small homes in developments, but with much greater flexibility around the character of the development and the area with the potential to achieve more affordable housing by amending the mix of market homes. Option 1 will ensure that new market housing does not focus exclusively on small homes, seeking instead a variety of housing sizes to meet the full range of needs, assisting social cohesion and sustainability of the community.

#### **Housing as priority use**

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

6.40 Housing has been the priority land use of successive Camden plans, including the 2000 Unitary Development Plan and the two subsequent plans. Housing need in Camden continues to outstrip supply by a wide margin. The Further Alterations to the London Plan propose to increase the capacity-based target for Camden by 30%, and needs are estimated to be 20% higher than the capacity-based target.

6.41 However, student housing is the most viable form of housing because it is not required to fund conventional affordable housing (in accordance London Plan policy), and student housing providers can frequently outbid traditional housing developers. There is great concern that demand by student housing providers are squeezing the potential for additional development of self-contained housing with affordable housing. Inspector's in planning appeals have determined that the housing priority in the Camden Core Strategy 2010-2025 applies equally to student housing and self-contained housing. Consequently the current Core Strategy does not enable the Council to ensure a continuous supply of new self-contained housing.

6.42 The following alternatives have been subject to appraisal -

1: Prioritise self-contained housing

2: Prioritise all housing, including student housing

These alternatives were the focus of appraisal in January 2015

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.43 Option 1 would have a major positive impact on objectives relating to housing and a minor positive impact on objectives related to poverty and sustainable communities by prioritising housing that can meet the needs of local families with moderate and lower incomes.
- 6.44 Option 2 would have a minor positive impact on objectives relating to housing and poverty by helping to increase the supply of housing overall and freeing up private rented housing to meet general needs, and a minor positive impact on reducing reliance on private transport as public transport accessibility is an explicit consideration in student housing policy.
- 6.45 Both options would have a minor negative impact on the employment growth objective by prioritising housing rather than business.

### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

- 6.46 The preferred approach, as set out in the Local Plan Submission draft, is to progress Option 1. A specific priority for self-contained housing is warranted by the desperate shortage of housing for general needs, the existing concentration of student housing in Camden's part of Central London, the high proportion of recent student housing completions, and the high viability of student housing compared with self-contained housing.

### **Student housing**

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.47 Camden is home to a significant proportion of London's higher education institutions and these make a major contribution to Camden's economy. The availability of student housing close to these institutions helps to attract students to study in Camden.
- 6.48 However, the borough already hosts one of the highest shares of purpose-built student housing in London, and has a substantial pipeline of student housing proposals with permission in place. Some of the older stock is out-dated, lacking exclusive use of amenities like showers and modern facilities like wireless internet.

6.49 Members and communities are therefore concerned that new sites coming forward should be provide housing for long-term Camden residents, and also that sites that are currently in student use should be retained to ease the pressure on new sites. However, this position could restrict the growth of our higher education sector and prevent the replacement of outdated facilities.

6.50 The following alternatives for student housing have been subject to appraisal -

1: (restrictions on additional student housing)

A) resist development that would prejudice meeting the self-contained target or involve loss of an allocated site

B) allow the market to operate freely to respond to the relative demand for student housing and other types of housing

2: (resist the loss of student housing)

A) continue to protect existing student housing

B) allow student housing to be converted to self-contained housing

These alternatives were the focus of appraisal in January 2015

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

Option 1A and 1B

6.51 Option 1A would potentially have positive impacts on housing and sustainable communities by securing housing available to a wide range of people, including local people; whereas Option 1B would have negative impacts in this regard. However, Option 1A would potentially have a negative impact on economic growth objectives, given the importance of the higher education sector (whereas Option 1B would have a positive impact in this regard).

Option 2A and 2B

6.52 Option 2A would potentially have negative impacts on housing objectives by preventing renewal of poor quality stock; whereas Option 2B could have positive impacts by providing better housing for a wider range of people. Option 2A could be positive for economic growth; while Option 2B could have negative impacts by allowing a loss of housing for students.

### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

6.53 The preferred approach, as set out in the Local Plan Submission draft, is to progress Options 1A and 2A, which will place some constraints on the availability of new student housing and ensure retention of the existing stock. The combination should cancel out potential negative impacts of 1A on economic growth objectives and of 2A on housing objectives, while securing the positive impacts of 1A on poverty objectives. Policy can also be drafted to enable replacement of existing student housing on alternative sites, further reducing the potential for a negative impact on housing (quality) objectives.

### **Employment land and buildings**

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

6.54 Paragraph 21 of the NPPF states that “Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; ....and plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries”

6.55 The government has introduced new permitted development rights to allow the change of use of offices into residential, under Class J of the GDPO. Following evidence work on offices in Camden and the impact of this right, the Council has introduced Article 4 Directions for certain parts of the borough.

6.56 The current approach is to retain land and buildings suitable for continuous business use.

6.57 The following alternatives have been subject to appraisal -

1: Retain land and buildings that are suitable for continuous business use.

2: Allowing the market to intervene with greater flexibility. Provide less protection of employment uses in the borough.

3: Consider proposals for the intensification and/or redevelopment of employment sites and premises if the proposals can provide significant additional employment and other benefits through introduction of other uses.

These alternatives were the focus of appraisal in January 2015

#### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.58 Option 1 could have a positive impact on sustainable communities as the aim of this approach is to maintain the supply of employment land/buildings which are suitable for continued use (i.e. sustainable). Economic growth is also supported with this option as it allows for the retention of business premises which in turn provide employment opportunities. This approach is supported by Camden's corporate plan (Camden Plan) objective 3 'Creating conditions for and harnessing the benefits of economic growth'.
- 6.59 Option 2 could have positive impact on the housing generation as land for housing is more valuable than employment land in the borough. However it will probably have a negative impact on amenity particularly in areas predominantly occupied by employment uses. Loss of employment floorspace could also have a negative impact on the local/regional economy given the importance of Camden's economy to London and the UK.
- 6.60 Option 3 would involve giving consideration to proposals for the intensification and/or redevelopment of employment sites and premises if the proposals can provide significant additional employment and other benefits. This option allows for more efficient use of Camden's limited land by considering proposals which increase the provision of employment provision and introduce additional benefits thus supporting economic growth. This option would also help create additional employment opportunities for local residents, including training and apprenticeships. This option is also supported by Camden Plan objective 3 'Creating conditions for and harnessing the benefits of economic growth'.

#### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

- 6.61 The preferred approach, as set out in the Local Plan Submission draft, is to progress Option 3 which ensures continued success of Camden's economy by encouraging investment that supports business growth creating further job opportunities for Camden residents and develop the infrastructure that will help existing businesses to thrive. Any negative effects on amenity arising from proposals which include intensification will be addressed by other policies in the Plan.

#### **Industrial area**

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.62 Camden has a limited industrial and warehousing stock, which includes some modern, purpose built premises, and a large number of older purpose built units, railway arches, mews and converted residential spaces. These are spread across the borough with concentrations in areas such as Kentish

Town, West Hampstead, Kilburn, Gospel Oak and Hatton Garden. One reason for the lack of industrial floorspace is the competition from higher value land uses (the most obvious being residential) and lack of industrial stock renewal. Key regional policy on employment land-use is contained in the London Plan (Mayor of London, 2011) and the Land for Industry and Transport SPG (GLA, 2012) where Camden is identified as being a 'Restricted Transfer' borough and limited loss of industrial land is advised.

- 6.63 According to the latest Employment Land Study 2014 there is a low vacancy level in the Industry Area (as shown on the [Policies Map](#)) which points toward a continued demand for industrial and warehousing premises within LB Camden, a trend which was outlined within the previous ELR (2008) and which continues to remain relevant. Given the constrained availability of land for industrial and warehouse uses within LB Camden the majority of provision, with some exceptions, is within older stock, divided into small individual units.
- 6.64 Current approach is to protect the borough's main Industry Area from non-industrial/warehousing uses. However, the layout of the area is currently low density and sub-optimal and a better arrangement of buildings could secure continuing support for Central Activities Zone (CAZ) functions and also make a significant contribution to providing space for businesses in the growing creative and technology sectors.
- 6.65 The following alternatives have been subject to appraisal -
- 1: Continue to protect the Kentish Town Industrial Area
  - 2: Intensify uses within the Industrial Area, in whole or in part, as an employment led comprehensive development, whilst introducing other uses such as housing and offices

These alternatives are largely unchanged from those that were the focus of appraisal in January 2015. Following continuing work and discussion, Option 2 now includes 'in whole or in part, as an employment led comprehensive development'.

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.66 Option 1 could have a positive impact on economic growth as the aim of this approach is to maintain the supply of employment land/buildings which are suitable for continued use providing much needed employment opportunities. Protecting the industry area from any sort of non-industrial/ warehousing

development will however, limit new development needed to support growth in Camden.

- 6.67 Option 2 allows for intensification within the Industry Area and would have positive impacts on maintaining and creating new jobs, future housing provision, community facilities, efficient use of the limited land supply, new design and sustainability measures which are all needed to support Camden's growth. The option assumes that the Regis Road recycling centre is either not affected by the intensification or is provided at an alternative site without the loss of capacity. This option allows for intensification of employment uses which allows for increases in employment floorspace needed to support economic growth.

### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

- 6.68 The preferred approach is to progress Option 2 which ensures continued success of Camden's economy by encouraging investment that supports business growth. This will help to create further job opportunities for Camden residents and make the most efficient use of the Camden's limited land in order to support Camden's growth.
- 6.69 Following consultation on the Draft Local Plan and Interim SA further evidence work undertaken on the industrial area supported the preferred approach in the Local plan Submission draft (Option 2), but with additional wording to strengthen the approach to retaining industrial/employment uses, particularly where they support Central London or the local economy.
- 6.70 This evidence further supports the designation of the Kentish Town Regis Road Growth Area in the overall Spatial Strategy.

### **Advertisements**

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.71 Following the Council's advert hoarding removal initiative there is a recognised need for a specific advertisement policy. This is an approach taken by many other authorities.
- 6.72 Further to the need to have a policy for advertisements in the Local Plan, the Council is also exploring opportunities for additional income through display of advertisements. The Council is currently consulting on plans for advertising on Council owned property.
- 6.73 The following alternatives have been subject to appraisal -

1. Create a new policy for adverts which uses the content from current Camden Planning Guidance
2. Create a new policy for adverts which is based on the Camden Planning Guidance approach but also which sets out some areas where the Council may accept certain kinds of advertisements

These alternatives were the focus of appraisal in January 2015.

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.74 The main consideration relates to urban design, in particular the effects of advertisements on the character and appearance of areas. Option 1 has major urban design benefits as it will control the display of advertisements. Controlling the erection of adverts will be beneficial in the sense of: protecting the character and amenity of areas including conservation areas; stopping unsightly proliferations of signage, which will reduce street clutter; and preventing signage that causes light pollution or impacts on public safety. Option 2 will go some way to achieving these aims, however the potential for additional large format signage in some areas (for example in commercial areas) may lead to some of these benefits not being secured in these areas.

### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

- 6.75 The preferred approach, as set out in the Local Plan Submission draft, is Option 1. The Council will only select sites that do not harm the amenity of the area, and will be able to achieve these aims with an appropriately worded advertisements policy in place.

### **Basements**

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.76 There is ongoing concern about basement development from local groups, residents, and some Councillors. Camden has an existing policy which functions by requiring that applicants provide evidence to ensure that basement development does not harm the amenity or structural ground or water conditions of the area, or cause damage to neighbouring properties. The current approach requires evidence in the form of a basement impact assessments informed by the ARUP Camden Geological, Hydrogeological, and Hydrological Study 2010.

- 6.77 The Council can continue this performance and evidence based approach, or alternatively also seek to introduce a more restrictive policy that also sets prescriptive limits on basement development to one storey in depth and to no more than 50% of the garden area.
- 6.78 Experience from other boroughs has shown that it is possible to introduce a sound basement policy with prescriptive limits, justified by the effects of large basement construction on disturbance to neighbours, and harm to the character of the area (e.g. through diminishing the vegetation and character of gardens by building underneath them).
- 6.79 Following consultation on the draft Local Plan and Interim SA further evidence work has been carried out to attain the opinions of local residents regarding basement development in their area. A survey was sent to 9,368 addresses identified as being located near (regarded as 25 metres) to where basements may have been constructed within the last 3 financial years. The survey questions, sought resident's opinions on: construction impacts, effects upon the local water environment, damage to property, and visual impacts.
- 6.80 The council received 614 survey responses. More than half of respondents thought levels of noise, dust and vibration resulting from the basement development near them was unacceptable. Around one quarter was aware of some form of negative impact on their local water environment and damage to their property.
- 6.81 The following alternatives have been subject to appraisal -
1. Minor adjustments to policy without making prescriptive limits on depth or extent
  2. Restrict basement development of more than one storey depth and to more than 50% of the garden area (restrictive approach)

These alternatives were the focus of appraisal in January 2015, with added brackets (restrictive approach).

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.64 All basement development has an effect on the ground and water conditions. Cumulative effects are difficult to assess. More prescriptive limits would be in-line with the 'precautionary principle' and potentially prevent negative impacts on water and soil conditions.

- 6.65 As basement development is underground, the only likely significant effect is that on surface water, ground water, and slope stability. While basement development may have other effects, e.g. contributing to development – these effects are in a borough wide sense not significant.
- 6.66 Option 2 is more restrictive and is likely to have some minor positive effects on biodiversity and amenity values by further restricting basements extending underneath gardens. Option 2 will likely have minor positive impacts on waste, as basement development is waste and carbon intensive compared to above ground development, especially when it is considered that the majority of basement development is for additional ancillary residential accommodation in large dwellings rather than contributing to additional homes.

#### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

- 6.67 The preferred approach, as set out in the Local Plan Submission draft, is Option 2 as it should achieve benefits in terms of amenity, water, biodiversity, and waste.

#### **Local green space**

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.68 The National Planning Policy Framework has introduced a new designation for inclusion in local and neighbourhood plans. Local communities can identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.
- 6.69 The following alternatives were subjected to appraisal -
- 1: Support the principle of designating Local Green Space through Neighbourhood Plans
  - 2: Identify specific areas as Local Green Space in the Local Plan
- These alternatives were the focus of appraisal in January 2015

## Summary of assessment findings

\*This option has not progressed from the Interim SA January 2015.

- 6.70 Option 1, encourages communities to take the lead in identifying Local Green Space. This recognises their particular local significance and demonstrable value to the local community. Neighbourhood planning provides the tools enabling communities to identify green spaces themselves. A considerable part of the Borough has designated neighbourhood areas and forums allowing communities to prepare neighbourhood plans.
- 6.71 Option 2, addresses gaps in coverage where neighbourhood areas and forums have not been designated. However, the Council already has open space designations that would carry forward into the draft Local Plan.
- 6.72 The effects of green space designation at individual site level are the same whether the Council merely encourages communities to designate local green spaces or designates green spaces in addition to local communities.

### Outline reasons for selecting preferred approach in light of alternatives appraisal

- 6.73 Local green spaces are a powerful expression of local communities aspirations. The Council would not seek to identify these spaces. In view of the above, as set out in the Local Plan Submission draft, is to progress Option 1.

### Public open space

#### Outline reasons for focusing appraisal on this policy issue / set of alternatives

- 6.74 The National Planning Policy Framework (paragraph 73) addresses the importance of access to open space to promote the health and wellbeing of a community and states that local authorities should set locally derived standards for the provision of open space, sports and recreational facilities after they have assessed the quantity and quality of what is available within their area. We have undertaken an assessment through our Open Space, Sport and Recreation Study.
- 6.75 The Open Space Study identifies levels of public park provision in Camden. This type of open space is viewed as particularly important in providing opportunities for passive recreation. Camden currently has some 1.8 ha of public parks per 1,000 population and 2.7 ha of public open space per 1,000 population.

- 6.76 Those areas of the Borough which are deficient in access to public parks include parts of Fortune Green, Kilburn, Swiss Cottage, Haverstock, Camden Town with Primrose Hill, Frognal and Fitzjohns, Highgate, Kentish Town, St Pancras and Somers Town, Holborn and Covent Garden and Bloomsbury wards. The Study recommends that where a proposed development is located within an identified area of deficiency, additional land should be brought into public park use. When this cannot be achieved, it advises the Council to consider whether community use of non-public open spaces can be secured.
- 6.77 If a proposed development is not located in an area which is deficient in public park provision, then the Council is advised to seek enhancements in the 'quality' and 'value' of existing parks until the full potential of these spaces is realised. Types of enhancements suggested are improvements to the condition of parks, the range of facilities offered and the standard of access, e.g. the provision of new entrances or public realm improvements which encourage people to walk or cycle to the park.
- 6.78 The following alternatives have been subject to appraisal -
1. Maintain existing public open space provision standards of 9m<sup>2</sup> per person?
  2. Increase our public open space targets to 13m<sup>2</sup> per person as recommended by Atkins for residential?

These alternatives were the focus of appraisal in January 2015.

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.78 Option 1 would involve retaining the existing open space standard. This would mean that the Council would not be able to require more public open space than is already provided through development schemes. Not increasing the target would make it more challenging to address inequalities in access caused by the deficiency and under provision of open space in some parts of the Borough. However, this has to be balanced by the difficulties in providing new public open space within a highly built up area. Increasing provision may lead to pressure for higher value generating uses on sites and potentially, taller buildings and densification. This would be detrimental to the quality of Camden's townscape and heritage assets.
- 6.79 Option 2 proposes an increase to the open space standard. While this may appear desirable in terms of generating a higher amount of open space provision, and therefore more positive sustainability effects, there are a

number of practical difficulties with this approach. As stated above, very many schemes are already unable to meet the 9sqm requirement. This makes it difficult to justify a higher standard. Furthermore, Section 106 should address the additional demands on infrastructure arising from population growth. We are not able to collect a higher level of S106 in order to fund existing deficiencies (a component of the standard identified in the Open Space Study seeks to address existing deficiencies).

- 6.80 The Council will potentially use the Community Infrastructure Levy to fund strategic improvements to open spaces, e.g. Green Space Investment Projects. This will be charged on all eligible developments (meaning many different developments can contribute towards a planned project). This will allow Section 106 to be focussed on the provision of an appropriate amount of open space on-site or within the vicinity of the development.

#### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

- 6.81 In consideration with the above the Council will progress option 1, as set out in the Local Plan Submission draft. The options testing shows that increasing the open space standard (option 2) would, in theory, have more beneficial effects when tested against the sustainability objectives. However, this has to be balanced against the practicalities of implementation, in particular the legal tests which apply to developer contributions. Increasing the standard may also lead to unintended consequences such as much higher densities in order to meet the requirements for the on-site provision of open space.

#### **Car parking**

#### **Outline reasons for focusing appraisal on this policy issue / set of alternatives**

- 6.82 The current LDF includes a policy on car parking that seeks car-free development in areas of the borough with high PTAL ratings. Outside of these areas car-capped housing is sought.
- 6.83 The borough contains some of the worst traffic congestion in Britain with average speeds along Camden's roads only reaching circa 10mph. Motor vehicles are some of the worst contributors to the borough's poor air quality. Camden, like many other boroughs across London, has failed the Government's air quality objectives and since 2000 the whole borough has been declared an Air Quality Management Area (AQMA).
- 6.84 Some of the best public transport provision in the UK is located within the borough and modal shift patterns suggest movement away from the private car as a means of travel in Camden. For example, between 2001 and 2009

car travel in Camden decreased by 27%. Policies to reduce car parking provision will bring land previously allocated to car parking into more productive use such as providing housing and employment. It will also improve environmental conditions and the public realm by encouraging the use of sustainable and healthy transport modes such as walking, cycling and public transport.

6.85 The following alternatives have been subject to appraisal -

1: Introduce car-free across the whole of the borough

2: Introduce car-free housing for additional parts of the borough and car-capped housing for areas with lower PTAL ratings

These alternatives were the focus of appraisal in January 2015.

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

6.86 Option 1 provides substantial environmental benefits including improvements in air quality and the public realm which lead on to secondary effects such as a healthier population as interest in sustainable transport modes such walking and cycling increases. It is recognised that the absence of a car will cause difficulties for certain groups and in some locations. Option 1 still supports disabled parking, but groups traditionally reliant upon car use such as elderly people and those with young children are likely to be negatively affected by the policy.

6.87 Option 2 offers a more flexible approach. Camden however contains very few areas with poor/very poor PTAL ratings. Where low PTAL ratings have been identified, they are mainly located in the northern, less populated areas of the borough. These areas are also largely located within conservation areas and unlikely to experience large scale development.

### **Outline reasons for selecting preferred approach in light of alternatives appraisal**

6.88 The preferred approach, as set out in the Local Plan Submission draft, is to progress Option 1 (Introduce car-free across the whole of the borough). It is considered that option 1 provides significant cumulative benefits such as improvements to the public realm and the environment which can be enjoyed by all Camden residents, workers, and visitors. The flexible approach offered by option 2 would further the existing harm caused by car use, yet only benefit a relatively small number of residents.

## Town centres

### Outline reasons for focusing appraisal on this policy issue / set of alternatives

- 6.89 Traditional high street style centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out of centre retail development. The National Planning Policy Framework requires Local Plans to define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make it clear which uses will be permitted in such locations.
- 6.90 Option 1 is based on the existing approach which seeks to protect the role of retail in town centres by protecting a high minimum proportion of units in the A1 shops use class. This approach is endorsed by the Camden Retail and Town Centre Study 2013 which expects growing demand for retail space in the boroughs centres. Camden's centres are also performing well with a low rate of vacancy when compared to London and the UK. This vacancy rate has been falling since 2012 from 7.7% to 6.2% in 2014.
- 6.91 Option 2 represents a loosening on restriction on use in Town Centres. It is based on best practice guidance including the London Plan Supplementary Planning Guidance on Town Centres (2014) which states that boroughs should remain flexible in the light of structural changes in the retail industry, accommodate a broader mix of uses in high streets to support the vitality and viability of these areas.
- 6.92 Option 3 is a mixed approach, maintaining the stock of A1 shops premises in primary frontages (as with Option 1) while providing more flexibility on the secondary frontages to react to market needs and provide a good mix of uses including food, drink, and entertainment uses (as with Option 2).
- 6.93 The changes to permitted development rights (i.e. permitted change of use from retail A1 to A2) is a threat to the function of Camden's shopping areas.
- 6.94 The following alternatives have been subject to appraisal -
- 1: Maintain high proportion of A1 shops & low proportions of A3, A4, A5 uses
  - 2: Allow shift of proportion of A1 shops down & a shift to higher proportions of A3, A4, A5 uses
  - 3: Maintain high proportion of A1 shops on primary frontages & allow a shift to higher proportions of A3, A4, A5 uses on secondary frontages

These alternatives were the focus of appraisal in January 2015.

## Summary of assessment findings

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.95 Option 1 is likely to have minor positive effects for economic growth as it retains a supply of premises for A1 shops and the retail function of town centres. It also will have minor positive effects on amenity by restricting clusters of food, drink and entertainment uses.
- 6.96 Option 2 is will still have minor positive effects for economic growth as it retains some A1 shops, but also allows growth in other uses which are in demand. The loosening of restrictions which it represents may cause a greater number of food, drink, and entertainment uses in town centres which could (if not properly managed) result in minor negative effects on amenity through noise and other effects (litter, crime) of these uses into the evening.
- 6.97 The mixed approach of Option 3 offers the greatest benefits at it retains the retail focus on primary frontages, which scores well with economic growth, and sustainable communities as it protects a greater number of retail units increasing the supply for independent traders. More flexibility for food, drink, and entertainment uses on secondary frontages supports the retail role of the primary frontages, extends dwell times, makes town centres a focus for a range of activities, and expands activity into the evening to make create vibrant centres. The small potential risk of lowered amenity through increased food, drink and entertainment uses (which can be largely mitigated through existing protections such as licencing, hours of operation and so on) is outweighed by the benefits.

### Outline reasons for selecting preferred approach in light of alternatives appraisal

- 6.98 The preferred approach, as set out in the Local plan Submission draft, is Option 3 as it maintains the retail function of town centres, and a supply of premises for small and independent businesses through protection of the A1 shops premises on primary frontages, while allowing also allowing town centres to adapt to changes in the retail market, and 'role of the high street, by allowing a broader range of uses on the secondary frontages which will support the vitality and viability of the centres.

## Pubs

### Outline reasons for focusing appraisal on this policy issue / set of alternatives

- 6.99 Current LDF policy DP15 states that the Council will resist the loss of local pubs that serve a community role unless alternative provision is available nearby or it can be demonstrated that the premises is no longer economically viable. However this approach has meant that we have been most successful in protecting pubs that have a clear community facility role, such as space for evening classes, clubs, meetings etc. As such certain pubs that are important spaces for local communities to get together (socially interact) have been granted approval to change into residential, which is most often attractive where land values for housing are higher.
- 6.100 Section 8 of the NPPF 'Promoting healthy communities', paragraph 70, states that to deliver "the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments."
- 6.101 The Council has introduced immediate Article 4 Directions for a small number of pubs in Camden. Recent changes to the General Permitted Development Order 2015 include consideration of pubs which are listed/nominated as Assets of Community Value.
- 6.102 The following alternatives have been subject to appraisal -
- 1: Continue to resist the change of use of pubs that serve a community role
  - 2: Greater restriction on the change of use of pubs that are important to the local community and are of historic value

These alternatives were the focus of appraisal in January 2015

### **Summary of assessment findings**

\*The appraisal findings are largely unchanged from the Interim SA January 2015.

- 6.103 Resisting changes of use from pubs to housing will restrict the increase of housing in the borough; however, the scale to which this will impact overall housing supply is limited in consideration of the number of pubs that has the potential to convert into housing in the borough.
- 6.104 By retaining pubs that serve a community role we would ensure that access to such facilities is maintained. Pubs are often spaces that allow for social cohesion in the local community and considered important in Camden where the dense built environment tends to have a negative effect on social

interaction in a community. There would also likely be minor positive effects on economic growth whereby the presence of a pub supports and stimulates growth of other night-time economies such as restaurants.

- 6.105 Pubs are part of Camden's built fabric in terms of mix of uses but also part of its historic character and appearance. By retaining pubs we would ensure the protection of local distinctiveness, conservation areas and listed buildings.

**Outline reasons for selecting preferred approach in light of alternatives appraisal**

- 6.106 The preferred approach, as set out in the Local Plan Submission draft, is to progress Option 2. Both options are fairly similar, but the positive effects of Option 2 are considered to be greater with regard to retaining pubs that are important to the local community and promote social cohesion, in addition to those which add to the historic fabric of Camden..
- 6.107 There may be instances where there are areas of a high concentration of licensed premises where the Council will not seek to take such a restrictive approach due to amenity concerns.

## 7. Appraisal of the preferred approach

- 7.1 The preferred approach has been developed in light of the assessment of alternative options. This approach has also been developed taking into account a number of sources, including:
- the responses to engagement on the key issues for the Local Plan and draft Local Plan consultation;
  - evidence we have collected and commissioned; and
  - national, regional and local plans and programmes.
- 7.2 The Local Plan has been subject to amendment, following its consultation alongside the Interim SA report January 2015. Changes to this part of the appraisal have been made to provide clarity. Where changes have been considered moderately significant, these have been subject to further SA appraisal and incorporated in the assessment of the preferred approach. There have been no changes to the strategic approach of the Local Plan and no specific recommendations are outstanding.

### Methodology

- 7.3 For the purposes of appraisal the preferred policies have been grouped according to theme/topic.
- 7.4 Where, if any, negative impacts are identified we have proposed measures to mitigate against those negative impacts. In addition, improvements have been identified to strengthen the positive effects of plan policies.

### Appraisal findings

- 7.5 The appraisal findings are set out below. Full assessment sheets can be found in Appendix D.

### Spatial Strategy

G1a) Delivering growth and G1b) Location of growth

#### Major positive

- 7.6 This policy sets out the key drivers for the Local Plan overall spatial strategy with the key objectives of helping to deliver more housing and economic growth through the identified growth area, encouraging mixed use developments in more sustainable and highly accessible areas (SA objective 6). It sets out the geographical aspect to the plan in terms of identifying the areas, including the new growth area of Kentish Town Regis Road, which will be a key part of delivering growth. This policy will therefore help deliver

significant positive benefits in terms of housing delivery, economic growth and delivering benefits to residents (SA objectives 1, 5 and 6).

- 7.7 Policy G1 will have significant effects in encouraging the reuse or improvement of buildings and land, that are vacant, under-utilised or in disrepair and making the most efficient use of land through maximising densities where appropriate (SA objective 8). The location of growth element (G1b) aims to reduce reliance on private transport modes and enhance permeability for non-motorised travellers through the identification of suitable areas, whereas the overall promotion of additional growth could potentially have a potential **negative impact** due to the additional construction and associated traffic resulting from the promotion of growth.

### **Minor positive effects**

- 7.8 Policy G1 can help encourage healthier, safer communities with better access to community facilities (SA objective 2, 3), through promotion of key priorities and encouragement of comprehensively planned developments, such as the multi-site approach and for the Kentish Town Regis Road site. This links into objectives to promote high quality urban design (SA objective 7 i), though there could be potential **negative impacts** associated with development in or adjacent to conservation areas or relating to heritage assets (SA objective 7 ii), which would need to be mitigated through the more detailed policies in the plan.
- 7.9 The promotion of decentralised energy in the growth areas will have minor positive effects in connection with SA objective 15, in encouraging an energy efficient supply. However, this conflicts with SA objective 14 as decentralised energy has quite significant **negative impacts** on local air quality.

### **Summary and recommendations**

- 7.10 Whilst the policy is a single policy it has been assessed as two parts, 1a relating to the overall the delivery of the growth and 1b as the more spatial approach i.e. location of growth so that different aspects can be identified. Overall the policy has a number of major positives and is interlinked to a number of the other polices within the Local Plan.
- 7.11 Policy G1 will potentially have **negative impacts** upon amenity and Camden's conservation areas and heritage assets. While the policy itself will not help minimise impacts associated with development, the impacts will be mitigated through other polices within the plan.
- 7.12 To reduce the negative impacts associated with the promotion of decentralised energy the Council will only support such systems in appropriate locations and ensure that they are the best in class in terms of NOX emissions.

Accompanying Air Quality Assessments (AQAs) should show that the impact of decentralised energy on nearby receptors is minimal.

## Housing

Housing policies (part 1)

H1 Maximising housing supply

H2 Maximising the supply of self – contained housing from mixed use schemes

H3 Protecting existing homes

H4 Maximising the supply of affordable housing

H5 Protecting and improving affordable housing

H6 Housing choice and mix

### Major positives

- 7.13 Policies H4 and H6 both seek a variety of affordable housing to meet the needs of low and middle income households, and seek to ensure developments contribute to mixed, inclusive and sustainable communities. Policy H4 also includes flexibility around the proportion and type of affordable housing to ensure that affordable housing requirements do not harm overall housing delivery, while policy H6 seeks high quality housing and a range of specialist housing types to meet particular needs of local people. Each policy would have a major positive effect on SA objective 1 (to promote the provision of a range of high quality and affordable housing to meet local needs).
- 7.14 Policy H1 would have a major positive effect on ensuring new development makes efficient use of land and buildings (SA objective 8) as the policy seeks to return vacant homes to use, ensure new homes are occupied, and achieve the maximum appropriate provision of housing on sites that are underused or vacant, with reference to the London Plan's Sustainable Residential Quality density matrix.

### Minor positives

- 7.15 Policies H1-H3 and H5 have minor positive effects relating to SA objective 1 (to promote the provision of a range of high quality and affordable housing to meet local needs). Policy H1 and H2 aim to maximise housing delivery and delivery of self-contained housing (as distinct from student housing), particularly in mixed-use schemes, but these policies do not directly address the affordability of housing or the mix of sizes. Policy H3 aims to protect all types of housing, and protect three or more homes being combined into a

single home, so it helps to secure homes for everyone including people with moderate and lower incomes, but it does not seek to increase the overall housing stock. Policy H5 also secures an increase in overall housing provision and particularly affordable housing for low and middle income households through estate regeneration. The home sizes needed and the contribution to mixed, inclusive and sustainable communities are considered in accompanying paragraphs, the plan could potentially be improved by incorporating these issues into policy H5.

- 7.16 Policies H2 and H3 have minor positive effects relating to SA objective 2 (to promote a healthy and safe community). Policy H2 potentially adds to community safety by ensuring that active street frontages and natural surveillance are considered as an aspect of mixed-use schemes. Policy H3 potentially promotes healthy communities by allowing for some loss of residential floorspace where this is needed to allow expansion of healthcare premises to meet local needs. For the same reason, Policy H3 potentially has a minor positive effect on SA objective 3 (ensure access to local shopping, community and leisure facilities).
- 7.17 Policies H1 and H2 seek mixed-use development including housing so they potentially have a minor positive effect on ensuring access to local shopping, community and leisure facilities (SA objective 3), although they do not directly seek these facilities.
- 7.18 Policies H4, H5 and H6 potentially have a minor positive impact on tackling poverty and social inclusion (SA objective 4). Policy H4 does not directly address accessibility or economic development but it does seek affordable housing within new housing developments, and considers whether development will create mixed, inclusive and sustainable communities. Policy H5 does not directly address accessibility but it does seek development of high quality affordable housing as part of estate regeneration schemes, often located in areas needing economic development. While policy H6 does not directly address economic development, it does seek a range of high quality housing, including affordable housing and promotes mixed, inclusive and sustainable communities.
- 7.19 Policies H1 and H2 have minor positive effects on SA objective 6 (maximise the benefits of regeneration and development to promote sustainable communities) by prioritising self-contained housing (rather than student housing) which is more likely to meet the needs of local people. Policies H4-H6 are also expected to have minor positive effects on SA objective 6, as they do on objective 4, by encouraging affordable housing that meets the needs of local people.

- 7.20 Policies H3 to H5 all have minor positive effects on ensuring new development makes efficient use of land and buildings (SA objective 8). Policy H3 resists combining three or more homes into a single home, while policy H4 promotes high densities by seeking the maximum reasonable amount of affordable housing, with targets related to the capacity of the development. Policy H5 protects and seeks improvement to existing affordable housing, and will also increase overall housing provision and density through CIP estate regeneration. Policy H5 could potentially be improved through direct references to increased housing provision and density.
- 7.21 Policy H2 seeks housing close to jobs, and particularly in locations that have the best access to public transport, and therefore has minor positive effects on SA objective 9 (reduce reliance on private transport modes and enhance permeability for non-motorised travellers) and SA objective 14 (improve air quality). Policy H4 could also potentially have some positive impact on these objectives as access to public transport, workplaces, shops, services and community facilities are factors that will be considered under the policy when considering whether affordable housing should be sought on a site.
- 7.22 Policy H1 seeks to ensure that existing buildings are occupied, which potentially reduces the use of non-renewable resources in the construction of new buildings, and therefore has a minor positive effect on SA objective 16 (minimise the use of non-renewable resources).

### **Summary and recommendations**

- 7.23 Policies H1 – H6 all have a number of minor positive effects on the SA objectives, while policies H1, H4 and H6 each have a major positive effect against one SA objective.
- 7.24 It was identified that the positive effects of policy H5 could potentially be enhanced by making direct references in the policy to increasing housing numbers, appropriate densities, a range of housing types and sizes and creation of mixed, inclusive and sustainable communities. The submission draft has been changed in accordance with these findings.
- 7.25 The positive effects of policies H1, H2, H4 and H6 are likely to be felt in the medium to long term as it takes some time for new housing development to have a significant impact on the overall mix of housing in the borough. The positive effects of policy H5 are also likely to be felt in the medium to long term as estate regeneration takes some time to plan and implement. Policy H3 has operated in some form in the borough for many years, it has short term and continuing positive effects through the protection of homes at relatively high densities and the flexibility for healthcare premises to expand to meet local needs.

- 7.26 Generally the positive effects of policies H1 to H6 would be borough wide. The positive effects on objectives relating to access to services, reliance on public transport and air quality (SA objectives 3, 9 and 14) are likely to be focussed on Central London and the larger town centres where policy H2 particularly seeks additional homes in conjunction with non-residential development. The positive effects on high quality and affordable housing to meet local needs, tackling poverty and social exclusion and promoting sustainable communities (SA objectives 1, 4 and 6) are likely to be most evident in the less affluent areas where there is more potential to deliver affordable housing.
- 7.27 Generally the positive effects of additional housing are likely to be permanent as policy H3 protects against overall losses. However, positive effects of particular types of housing aimed at local needs are potentially reversible, as affordable housing can move into the market sector through the right-to-buy and through residents of shared-ownership homes 'staircasing' out (i.e. buying 100% of the home). Positive effects of additional provision of particular types of housing for local needs will be cumulative where it releases existing homes that can better meet different needs (e.g. older people moving out of large family homes) or alleviates overcrowding.

## Housing

Housing policies (part 2)

H7 Large and small homes

H8 Housing for older people, homeless people and vulnerable people

H9 Student housing

H10 Homes with shared facilities ('houses in multiple occupation')

H11 Accommodation for travellers

### Major positives

- 7.28 Policy H11 provides for traveller community to benefit from well-located and designed sites that will help them to engage positively with the wider population, which would have a major positive effect on SA objective 4 (tackle poverty and social exclusion and promote equal opportunities). Providing more pitches will help to tackle inequality and create sustainable and resilient neighbourhoods by relieving overcrowding for Camden's travellers, improving the community's health and wellbeing and better enabling children and young people to take advantage of education and training opportunities. Providing more pitches will also help us ensure the right housing for Camden's diverse communities in line with recommendations of the Equality Taskforce.

### Minor positives

- 7.29 All housing policies above H7 – H11 show to have minor positive effects with regards to SA objective 1 (to promote the provision of a range of high quality and affordable housing to meet local needs). Policy H7 requires development to provide for a suitable mix and size of dwelling for a projected range of household types in Camden. Policy H8 seeks to protect and secure housing that meet the needs of the elderly, vulnerable and homeless people in Camden, where it is recognised that people needing some form of support is expected to increase over time due to factors such as greater identification of conditions such as autism, and growing numbers of older people with longer life expectancy. H9 seeks to secure and increase the supply of student housing and is available at costs to suit students from a variety of backgrounds. Policy H10 protects housing of a particular need (HMOs) and decent standard for lower income small households. In addition to providing a sufficient supply of pitches which meet the needs of existing and future gypsy and travellers, the Council will seek to protect existing sites through policy H11, which provides a low cost housing option for a particular lower income group.
- 7.30 Policy H8 allows for the provision of housing for vulnerable, homeless and elderly people in areas which are in a safe environment, close to healthcare and other community facilities, shops and services and the social networks appropriate to the needs of the intended occupiers. This will have positive effects in relation to SA objective 2 (to promote a healthy and safe community).
- 7.31 Policies H7, H8 and H9 will have minor positive effects upon ensuring the plan tackles poverty, social exclusion, and promotes equal opportunities by requiring housing development provides a suitable mix of sizes for a mix of groups (including the needs of vulnerable groups). Policy H9 also provides housing for disadvantaged groups and seeks to ensure that student housing development contributes to creating mixed and inclusive sustainable communities and does not create an overconcentration of such uses as to harm amenity. The effect of policy H9 could possibly be enhanced by including a reference to wheelchair friendly accommodation.
- 7.32 Policies H7, H8, H9, and H11 are shown to have positive effects on SA objective 6 (maximise the benefits of regeneration and development to promote sustainable communities), similar to the paragraph above, where the policies encourage housing development to meet local needs. Policy H7 promotes social wellbeing by ensuring that the range of dwelling sizes is appropriate for the projected distribution of household sizes, and thereby

securing dwellings of a suitable size to meet the needs of families. Policies H8, H9 and H11 will provide specialist housing for particular local needs.

- 7.33 Design quality is noted in policy H11, where development is required to be attractive and of the highest design quality, which will have very minor positive effects on SA objective 7 (promote high quality and sustainable urban design which protects and enhances the historic environment).
- 7.34 Policy H7 provides some flexibility for varying the requirement for large and small homes where this will enable the best use of existing buildings and enable vacant properties to return to use. Policy H10 also provides some flexibility around conversion of housing with shared facilities (HMOs) that have a history of vacancy where this will enable them to be bought back into use. These areas of flexibility will have positive effects on SA objective 8 (ensure new development makes efficient use of land, buildings and infrastructure). The Council will assess the form of renovation or development best able to provide residential accommodation of reasonable quality, and may accept self-containment in some circumstances. Since construction of new buildings involves the use of non-renewable resources, the re-use of homes would have a minor positive effect on SA objective 16 (minimise the use of non-renewable resources).
- 7.35 Policies H8, H9, and H11 require that housing development is close to and easily accessible to public transport facilities. This would have minor positive effects on SA objective 9 (reduce reliance on private transport modes and enhance permeability for non-motorised travellers) and 14 (improve air quality).
- 7.36 It is recognised that student accommodation raises specific concerns such as noise disturbance. As noted above, policy H9 seeks to ensure that the proportion of student housing accommodation does not **negatively impact** upon amenity and where the scale or concentration of student housing proposed is likely to harm the balance and sustainability of the community or otherwise harm local amenity, the Council will seek a range of mitigating measures such as management plans, and will resist proposals where mitigation is not possible. This is also recognised in policies H8, H10, and H11 whereby we will secure mitigating measures where appropriate.

### **Summary and recommendations**

- 7.37 Housing policies H7 – H11 have shown to have both minor and major positive effects on sustainability objectives.
- 7.38 It was identified that the positive effects of policy H9 could possibly be enhanced by including a reference to wheelchair friendly accommodation.

Furthermore policy H8 could be strengthened by adding reference to the protection of amenity in the policy text, not just supporting text.

- 7.39 Positive effects of policies H7 – H11 are likely to be felt in the medium to long term as it takes some time for additions to particular housing types to have a significant impact on the overall mix of housing in the borough, and it may take some time to identify suitable sites for some specialist housing. Generally the positive effects noted above will be borough wide, although with students there may be a dispersal of new accommodation from Camden's Central London wards due to current concentrations.
- 7.40 The positive effects of some of the specialist housing noted in these policies are potentially reversible i.e. they could easily be converted into housing to meet other needs, although we would expect any conversion of these specialist housing types to provide general needs housing, so there would be a permanent overall housing gain. Positive effects of additional provision of particular types of housing for local needs will be cumulative where it releases existing homes that can better meet different needs (e.g. older people moving out of large family homes) or alleviates poor conditions or overcrowding.

### **Community, health and wellbeing**

C1 Improving and promoting Camden's health and wellbeing

C2 Community facilities

C3 Cultural and leisure facilities

C4 Pubs

C5 Safety and security

C6 Access for all

### **Major positive effects**

- 7.41 Policies C1, C2 and C3 will have major positive effects on promoting a healthy and safe community and access to community and leisure facilities. C1 requires development to positively contribute to creating high quality places that supports healthy communities, supporting the issues of tackling health inequality and promoting health and wellbeing throughout the plan document. The benefits of policy C1 could be further improved by highlighting areas of need for healthcare facilities. Policy C2 seeks to ensure that health and other community facilities are retained where it meets a specific need unless an appropriate replacement facility is provided, or that evidence demonstrates that the facility is no longer required. To help address increased demand for facilities, policy C2 requires developments that result in any additional need to contribute towards supporting existing or new facilities.

- 7.42 Policy C4 seeks to protect pubs that are of particular value to the local community and ensure that historic fabric and features are retained wherever possible (SA objective 7 ii). This policy will have significant positive effects on social cohesion as it supports the function of these meeting places. In addition, there is recognition in the policy that many pubs in Camden are central to the borough's heritage and local culture and thus ensuring the protection of local distinctiveness, conservation areas and listed buildings.
- 7.43 The focus of policy C5 is to make Camden a safer place for those who work, live and visit the borough and reduce crime levels. Major positive effects are therefore identified in relation to SA objective 2 which also shares this aim.
- 7.44 Policy C6 (access) will have a major positive effect on the objectives to tackle social exclusion and promote equal opportunities by ensuring access for all people in development, including those with disabilities or older people.

#### **Minor positive effects**

- 7.45 Minor positive effects relate to sustainability issues such as housing quality, social exclusion, equality, and employment.
- 7.46 The quality of homes in the borough is likely to be better where developers are required to consider the wider determinants of health and wellbeing and to demonstrate this through the submission of a Health Impact Assessment (HIA), as required in policy C1. The determinants of health and wellbeing include social, environmental, economic, and cultural factors which when considered in the early stages of a planning application can lead to a number of minor and major positive effects. A HIA should ensure that developments reduce or seek to prevent social exclusion and that facilities, access to healthy food, employment and play areas are within easy distance. There would be minor positive effects on design and biodiversity, where the public realm, permeability and enhancing an areas identity are also considerations in a HIA.
- 7.47 Policy C4 would limit the circumstances where planning permission is allowed for a change of use to residential but the significance of the effect is considered minimal in consideration to the proportion of units likely to be affected across the borough. The policy will contribute to maintaining a lively evening economy – attracting investment and jobs, particularly when they are interspersed in Town and Neighbourhood Centres, contributing to positive multiplier effects. The protection of pubs of social, economic, cultural and historic value to the local community will have positive effects which promote sustainable communities, in retaining sites that will continue to promote social wellbeing and benefit the economy. Policy C2 will also contribute to the economy as it's supportive of the development of higher education facilities which in turn stimulates research and jobs.

- 7.48 Policies C2 and C3 would have minor positive effects on SA objective 4 by encouraging development that facilitates social cohesion. Both policies also expects community, cultural and leisure facilities to be located in the most appropriate locations, close to the communities that they are intended for, which will have positive effects on reducing the reliance on private transport modes.
- 7.49 Minor positive effects have been identified under SA objectives 4 & 7i with regards to C5. The policy seeks development to be permeable and adopt the use of active frontages as a means of reducing crime via natural surveillance. Associated with these measures will be an increase in accessibility and improvements to the public realm.
- 7.50 The objectives for sustainable communities will benefit from minor positive effects from policy C6 which will provide housing for the needs of local people. This policy is likely to have minor positive effects on the transport objectives as it requires access for all people in development including to and from public transport.

### **Summary and recommendations**

- 7.51 The community and health and wellbeing policies have shown to have both minor and major positive effects on sustainability objectives.
- 7.52 While policy C1 has shown to have major positive effects, the appraisal highlighted that these effects could be further improved by identifying the areas of need for healthcare facilities.

### **Town centres and shopping**

TC1 Distribution of retail

TC2 Protecting and enhancing Camden's centres

TC3 Shops outside centres

TC4 Food, drink, entertainment and other town centre uses

TC5 Small and independent shops

TC6 Markets

### **Major positive effects:**

- 7.53 With regards to SA objective 3, major positive effects have been identified against policies TC1 and TC2. Policies TC1 and TC2 seek to encourage the growth and vitality of Camden's Town and Neighbourhood Centres. The

location of new services will have good public transport provision as Camden's centres are well served by buses and trains.

7.54 Policies TC5 and TC6 seek to promote and protect small shops and markets which are seen as offering major positive benefits in relation to economic growth (SA objective 5). Small shops and Markets provide opportunities for start-up businesses, they can also increase retail offer, vitality and give character to an area, providing a catalyst to draw other services in. Markets can also help to meet the specialist food needs of ethnic communities; black and minority ethnic groups tend to make significantly more use of local markets than the general population. The criteria set out in the markets policy TC6 was considered somewhat negative, which was not its intention.

7.55 Policies TC2 and TC4 also provide major positive effects in relation to SA objectives 2 and 10. These policies will seek to maintain an area's vitality by ensuring that the area maintains a balance of uses, particularly food, drink and entertainment. As excessive food, drink and entertainment units can potentially contribute to higher levels crime and/or anti-social behaviour late at night which causes particular problems in close proximity to residential areas.

#### **Minor positive effects:**

7.56 Policy TC2 supports housing above shops which traditionally has been cheaper than other forms of housing. People with lower/moderate incomes identified within SA objective 1 will therefore benefit.

7.57 Policies TC1 and TC2 seek to create conditions where a person's entire shopping needs are met in one place, serviced by good public transport links (i.e. Camden's Centres). Complimenting these policies however is also TC3 which seeks to protect shops outside of centres and largely relevant to convenience shopping. The result of these policies combined will likely result in fewer trips by the private car. Minor positives in this respect are therefore identified under SA objectives 2 and 9 as less traffic should encourage further take up of 'active' travel such as walking and cycling. Fewer private car trips will also create minor benefits associated with SA objectives 14 and 15 (improve air quality and minimise the use of non-renewable resources).

#### **Summary and recommendations**

7.58 The town centre and shopping policies have shown to have both minor and major positive effects on sustainability objectives.

7.59 Policy TC6 sets out a number of criterion which applications for new markets must meet. However this offers a slightly **negative/reserved** impression of the council's attitude to markets. Camden has a rich history of markets and

contains several that are world famous. It was identified that the policy could potentially be improved by being more proactive in its approach to markets.

### **Economy and jobs**

E1 Promoting a successful and inclusive Camden economy

E2 Employment premises and sites

E3 Tourism

#### **Major positive effects**

- 7.60 Policies E1 and E2 seek to support local enterprise development, employment and training schemes for local people. The policies recognise the skills mismatch in the skills needed by the borough's employers and the many of members of Camden's community. This will have major positive effects in relation to SA objective 4 and 6 whereby the plan promotes access to employment and training opportunities for local people.
- 7.61 Policies E1 and E2 positively encourages sustainable economic growth and employment opportunity by safeguarding sites and premises, as well as supporting Camden's growth. The policies ensure that we maintain a stock of premises and sites that are suitable for a variety of businesses of different sizes, conditions and resources, support growth of significant sectors, and provide for development opportunities through intensification of employment sites.
- 7.62 While policy E2 does require marketing evidence of 2 years or more before a change from a business use to a non-business use is considered, policies E1 and E2 allow for intensification of employment sites and premises where appropriate. This is considered to have positive effects in relation to SA objective 8 (efficient use of land).

#### **Minor positive effects**

- 7.63 While policies E1 and E2 safeguard employment premises and sites, there is an element in the policy that allows for developers to consider increasing the proportion of employment floorspace and number of jobs and provide for priority uses, such as housing (particularly affordable housing). Such policies will ensure that the proportion of employment floorspace is maintained and/or increased and serve to increase the supply of housing, including affordable housing. The element in policies E1 and E2 with regard to intensification means that areas with vacant buildings, or those buildings that are not used to full potential, could be redeveloped and possibly their uses intensified. This will likely bring more people to the area – through additional jobs and in the right circumstances additional uses, which in turn would increase natural surveillance, contributing to a healthy and safe community.

- 7.64 Policies E1 and E2 allow for circumstances which introduce mixed uses where the conditions are appropriate, so may have minor positive effects with regards to SA objective 3. Policy E2 has been strengthened as a result of past appraisal and in response to comments to ensure that the Council retains industrial/employment uses in any redevelopment, particularly where they support the Central Activities Zone or local economy.
- 7.65 Policy E3 recognises that large scale tourism development in Camden attracts a large number of visitors and thus new development is directed to Camden's growth areas and Central London and requires all tourism development to be easily reached by public transport. We also expect large scale tourism development and visitor accommodation in Camden to provide training and employ Camden residents, which would have positive effects in relation to SA objective 4 and 6.
- 7.66 Policy E1, directs new office development in locations that are easily accessible by public transport, such as Central London and Camden's growth areas and town centres. This approach is the same for new large scale tourism development and visitor accommodation, although small scale development and accommodation is also required to be in areas with good public transport accessibility.
- 7.67 Amenity and design is a consideration of policy E3 whereby the policy requires all tourism development and visitor accommodation to not harm the balance or mix of uses in the area, local character and residential amenity.
- 7.68 There may also be minor positive effects in relation to SA objective 16 'non-renewable resources' if the resource includes buildings or land, whereby policies E1 and E2 promote the reuse of older building stock for different business needs and maintain premises or sites suitable for all sizes.

### **Summary and recommendations**

- 7.69 The economy and jobs policies displayed some minor and major positive effects when assessed with SA objectives and related criteria. It is clear that new large scale development will be focused in Central London, growth areas and town centres, while smaller scale development should also be located in areas easily accessible by public transport.
- 7.70 The positive effects of these policies are likely to be felt throughout the plan period. The application of these policies will help the Council implement the growth ambitions by continuing to attract businesses, jobs and investment to the borough. These policies will also help increase employment opportunities and help increase local employment through created opportunities. The effects are likely to be long lasting as it supports the growth agenda post-recession.

## Transport

T1 Sustainable Transport

T2 Car free

T3 Improving strategic transport infrastructure

T4 Freight

### Major Positive effects

- 7.71 All transport policies share the aims of SA objective 9 and therefore these policies are considered to have major positive effects in this respect.
- 7.72 Improvements to the pedestrian environment and cycle routes, as required in policy T1, will encourage people to take up more active means of travel, which helps to increase fitness levels and reduce illnesses associated with obesity. Increased pedestrian use also acts as a means of natural surveillance which will help to deter criminal activity and reduce fear of crime.
- 7.73 Policy T2 is seen to provide major positive benefits in relation to SA objective 8. Car free development and the loss of existing car parking land to alternative uses would mean that this land could be better utilised and allocated for more essential uses such as housing, employment and improve the public realm.

### Minor Positive Effects

- 7.74 All transport policies will provide minor positive effects in reducing the use of fossil fuels, CO<sub>2</sub>/greenhouse gas emissions and improvements in air quality relating to SA objectives 14 - 16.
- 7.75 Policy T1 seeks improvements to the walking and cycling environment and will provide positive effects relating to SA objectives 3, 5 - 7 as these are associated with improvements to the public realm. Public realm improvements will enable spaces to become places of greater activity, after which investment and services (particularly leisure and retail) will follow. Sustainable transport is a cheaper means of transport than that of private car and therefore has a positive effect in relation to SA objective 4. Improving walking and cycling routes can also result in features such as green corridors which could be regarded as a positive effect in relation to SA objectives 7i and 12.
- 7.76 There could possibly be amenity benefits arising from policies T1 and T2 through reduced traffic noise.
- 7.77 Existing car parking land could be reallocated for a number of different uses including housing, employment, and public realm. Policy T2 could therefore potentially provide economic, social and environmental benefits. Car parks can also appear desolate and empty, particularly at night. Bringing in more active

uses to these spaces can therefore contribute to a safer environment (SA objective 2). Linked to policy T1, limiting the availability of parking will also encourage the use of public transport and therefore increase the use public transport hub areas. Camden suffers from some of the worst traffic congestion within the UK, a factor which is considered to limit economic growth. Car free development and improved provision of sustainable transport modes will likely contribute to more efficient movement on Camden's Roads and the surrounding area (SA objectives 5 and 6).

- 7.78 Policy T2 requires all future development to be car free. Those less mobile (but not necessarily disabled) such as older people and people with young children are associated with high car reliance as are people whose employment and skills requires vehicular use (e.g self-employed trades people) and as such would not provide housing that meets these needs (**negative effect**). It is estimated however that at least 90% of Camden's existing housing stock has parking provision.
- 7.79 Policy T2 will also ensure that existing front gardens and boundary treatments are not turned over to car parking which provides positive effects relating to SA objective 7 and 12. Front gardens are important elements that act to soften the townscape, particularly within conservation areas. Garden areas also provide wildlife habitats. Positive effects are also identified under SA objective 11 as land used for car parking can also increase flood risk and water pollution. Surface water is unable to drain and can potentially collect pollutants from oil, petrol and rubber deposits.
- 7.80 Policy T3, seeks to safeguard Camden's key public transport infrastructure improvements and the associated economic growth that is expected. Safeguarding will enable these projects to come to fruition. Positive economic, social and environmental effects have therefore been identified in relation to SA objectives 2, 4, 5 & 8. The provision of new community facilities, training and employment for local people will play a key part in the regeneration of the area. The Euston Area Plan also includes the use of green corridors which will improve standards of amenity for residents by reducing noise from Euston Road. The policy will also create positive effects in relation to urban design as safeguarding large projects such as the Euston Area and Crossrail 2 will ensure that these areas are redeveloped via comprehensive master planning as opposed to piecemeal development (SA objective 7).
- 7.81 The safeguarding of projects identified within T3 has the potential to cause the reduction of property values or activity in an area/building(s) expecting future development. The Euston Area Plan is being prepared for the area around Euston Station to help shape change in the area up to 2031 and seeks to ensure that, whether or not the new High Speed rail link (HS2) goes ahead,

despite Camden Council's strong opposition to HS2, we can get the best possible future for the residents, businesses and visitors to Euston. Construction work in the area will inevitably cause disruption to residents and therefore cause **negative effects** upon their amenity. This negative impact is however temporary and significant benefits will be enjoyed as a result of safeguarding.

- 7.82 Policy T4 will also provide a minor positive effect in relation to SA objective 5. The policy will seek to protect and expand Camden's freight consolidation facilities. However, **negative effects** have been identified under SA objective 12 as the policy may cause harm aquatic habitats. Overnight rail freight may also cause disturbances to people living in close proximity to freight rail lines.

### **Summary and recommendations**

- 7.83 All transport policies are shown to have minor and major positive effects when assessed with SA objectives and related criteria. The assessment has also identified negative effects amongst the positives, these have been highlighted in the text above.
- 7.84 The assessment has identified that car free development in Camden will likely give rise to positive effects on human health, air quality and movement. While negative effects have been identified, there is a significant proportion of housing stock in Camden that provides car parking. It is not clear what mitigation measures could be implemented here and thus the effects will need to be monitored.
- 7.85 Car clubs have previously been identified as a solution to mitigate those negatively affected by TR1. Between 2008 and 2013, Camden significantly increased the use of car clubs via the planning process. By June 2013 the borough boasted 265 car club parking bays on street, which is the highest number among all the London boroughs. Recent research however has suggested that car club membership has peaked, resulting in a number of car club bays being underused. The policy therefore does not seek the provision of further car club bays, however projects outside of the planning process (such as marketing) could be undertaken to encourage more activity in this area.
- 7.86 With regards to TR3, the effects of 'planning blight' could be mitigated against via compensation (paid by the infrastructure providers). Camden is objecting to HS2 terminating at Euston, however the Euston Area Plan already contains a number of strategies to mitigate the effects of the project, including the displacement of existing communities.
- 7.87 Although it is unlikely that TR4 will cause significant increase in canal freight, Camden's Biodiversity Action Plan identifies Regent's Canal as a site of

Metropolitan Importance. The policy has been amended to require the submission of evidence in planning applications for canal freight, to ensure that these habitats are not negatively impacted.

### Sustainability

CC1 Climate change mitigation

CC2 Adapting to climate change

CC3 Water and flooding

CC4 Air quality

CC5 Waste

### Major positive effects

- 7.88 There are likely to be major positive effects of policies CC1 and CC2 on encouraging the use of sustainable design and construction. Policy CC1 requires new developments of 5+ dwellings or 500m<sup>2</sup> floorspace to follow the London Plan energy hierarchy, where buildings are designed to prioritise lower cost passive design measures such as improved fabric performance over higher cost active measures such as renewable technologies. This policy also supports retrofitting over demolition and expects all developments to optimise resource efficiency. Policy CC2 imposes standards BREEAM, in addition to requiring that all schemes demonstrate how sustainable design principles have been incorporated into the design, in a design and access statement. It should be noted that there may be a conflict in the criteria for SA objective 7 as some sustainable design measures could have a **negative effect** on providing high quality urban design (although they could go hand in hand) as well as negative effects upon the historic environment. These negative effects will need to be balanced against the public benefit of reducing carbon emissions, ensuring comfortable living and reductions in energy bills. Where it is shown that the benefits outweigh the harm caused, the sustainable design measures will need to be sensitive to the nature of the building.
- 7.89 Policy CC1 will have major positive effect upon the efficient supply of energy through renewable technologies, including decentralised energy. By supplying energy efficiently there will be positive effects on tackling issues such as fuel poverty and reducing carbon emissions in the borough.
- 7.90 Policy CC3 'Water and flooding' is supported by evidence contained in Camden's Strategic Flood Risk Assessment 2014. The policy seeks to reduce the risk of flooding and manage water resources by ensuring: vulnerable development is not located in flood prone areas; consideration is taken on the impact of development in areas at risk of flooding; greenfield run-off rates are achieved and where not possible run-off levels pre-development are not

exceeded post-development; and that development includes the incorporation of water efficiency measures. The borough is located in Flood Zone 1 and therefore development does not need to follow the sequential/exceptions test, as required by the NPPF. However, where mitigating measures are required to make a development acceptable these will be required by planning condition. Through consultation the water policy includes the protection of Camden's existing drinking water supply, foul water infrastructure, and groundwater source protection zones.

- 7.91 Cumulatively policy CC2 is likely to have a minor to major positive effect on biodiversity in the borough over the long-term where the provision of green/brown roofs and walls are incorporated into developments. To ensure the lifetime of these habitats we will request that the specifications are tailored to realise the benefits of the site with drought resistant planting.
- 7.92 Policy CC5 will have a major positive impact in relation to SA objectives 13 and 16 by seeking to reduce the amount of waste produced in the borough and by providing options for future waste management. The preferred approach will also seek to minimise the use of non-renewable resources by encouraging recycling.

### **Minor positive effects**

- 7.93 Both policies CC1 and CC2 will provide the opportunity for people to live in a better home. Both policies will ensure that new and converted dwellings provide comfort and are built to a standard which retains heat better in the winter and is cool in the summer. While very minor, requirements for BREEAM provide credits for bike storage and it is more likely that people will opt for a healthier mode of transport if they have somewhere suitable to store a bike.
- 7.94 Policy CC1 encourages the location of development in areas with high public transport accessibility, so as to minimise the need to travel by car and support decentralised energy networks. This should help to support policies which focus growth in Growth Areas, Central London and Town Centres.
- 7.95 While policy CC1 will likely have positive effects in reducing pollutants to the atmosphere, by reducing the need to travel by car and the use green technologies, it may also have significant **negative effects** on air quality through the promotion of decentralised energy. The air quality policy CC4 notes that CHP and biomass boilers have serious air quality implications. To reduce these negative effects biomass boilers will be the least favoured option as a renewable energy source and we will only accept CHP in appropriate locations. CHPs must also be the best in class in terms of NOx emissions and it must adhere to the latest emissions standards. An Air Quality Assessment

with full dispersion modelling will also be required for all proposed CHP boilers which must demonstrate that its impact on nearby receptors is minimal.

- 7.96 Policy CC2 promotes the sustainable use of water resources by requiring 60 per cent of credits in the water category in BREEAM. Policy CC3 also requires the incorporation of water efficiency measures. In terms of water quality policy CC3 is likely to have a minor positive effect by ensuring that developments avoid harm to water quality and environment.
- 7.97 Policy CC1 will be effective in reducing the amount of waste requiring disposal at construction sites, through added requirements. Where justification for demolition is fully justified the Council will require 85% waste diverted from landfill and either re-use materials on-site, or salvage appropriate materials to be used off-site.
- 7.98 While the purpose of policy CC4 (air quality policy) is to safeguard and mitigate against the negative effects of air pollution in the borough, it is unlikely to help reduce the discharge of particulate matter in the atmosphere. As such the CC4 is only considered to have a minor rather than major effect on the baseline. The policy will ensure that where development will cause harm to air quality that planning permission will be refused unless mitigation measures are adopted to reduce the impact to acceptable levels. The positive effects of this policy could be enhanced by requesting that developments comply with the GLA's air quality neutral policy.

### **Summary and recommendations**

- 7.99 Both mitigation and adaptation policies have shown to have both major and minor positive effects, although there are clear conflicts between these policies and design / heritage and air quality objectives.
- 7.100 The requirement for Code for Sustainable Homes has been withdrawn and this element has been removed from policy CC2. However, as the Council is still allowed, at present, to set targets for energy policy CC1 will require all new housing developments to achieve a 19% carbon dioxide reduction below Part L 2013 Building Regulations (we will also continue to require major developments to achieve London Plan targets for carbon dioxide emissions reductions).
- 7.101 The Water policy could further improve sustainability objectives by including information on the quality of Regent's Canal, in accordance with EU Water Framework Directive.
- 7.102 To ensure that the negative effects of sustainable design measures on the historic environment are reduced we will only permit such measures where the

public benefits outweigh the harm caused and will ensure that such measures are as sensitive as possible.

- 7.103 There are significant negative effects on air quality with the expansion of Decentralised Energy in the borough. As stated above, to reduce these impacts the Council will only support CHP in appropriate locations and be the best in its class in relation to NOX emissions. Accompanied AQA should show that the impact of CHP on nearby receptors is minimal.

### **Design and heritage**

D1 Design

D2 Heritage and conservation

D3 Shopfronts

D4 Advertisements

A5 Basements and lightwells

### **Major positive effects**

- 7.104 Policy D1 design will have major positive effects on the objectives for urban design by requiring development to be of high design quality, ensuring design responds to and considers context and character, details, materials, street frontage, accessibility, health, legibility, crime prevention, robustness, landscape design, views, and housing standards. Policy D2 will have major positive effects on protecting and enhancing the historic environment.
- 7.105 Policy D3 Shopfronts will have a major positive effect on town centres by preserving historic and high quality shop fronts, which contribute to the character and amenity of town centres.

### **Minor positive effects**

- 7.106 Policy D1 design will have minor positive effects on the SA housing objective 1, by providing people with a better place to live, as the policy requires buildings to be well designed, attractive, buildings, which meet housing standards. Policy D6 access will have minor positive effects to the SA housing objective by providing homes that meet accessibility needs (e.g. older people, disabled people).
- 7.107 With respect to the objective for promoting healthy communities policy D1 design will have minor positive effects by ensuring development reduces crime by being built to Secured by Design principles, including passive surveillance. Policy D1 design also ensures that design encourages healthy lifestyles, and by creating an environment which encourages sustainable forms of transport such as walking and cycling through legibility, permeability, active frontages,

and an attractive public realm. Policy D3 shopfronts will contribute to these objectives by creating or preserving active frontages by resisting solid roller shutters which will help prevent crime and fear of crime.

- 7.108 With respect to the SA objective 7 ii, there will be minor positive effects through policies D2 heritage, by retaining historic buildings which contribute to the character of the area and policy D4 advertisements, by ensuring that adverts do not harm the character and amenity of areas. Policy A5 basements will also have minor positive effects on the urban design objectives by preserving gardens and trees and by preventing excessive lightwells in front gardens.
- 7.109 Policy D1 advertisements will have minor positive effects on SA objective 10 as it will ensure that adverts are controlled with respect to their impact on amenity, such as preventing light pollution. Policy A5 also has minor positive effects on SA objective 10, by ensuring that basement development does not harm neighbouring properties.
- 7.110 With regards to SA objective 11 (water) policies D1 and A5 will have minor positive effects. Policy D1 design requires development to be sustainable (including green and brown wall and roofs), and A5 basements will have positive effects by preventing development that causes local flooding and by requiring basement development to incorporate Sustainable urban Drainage Systems. Policy D1 Design will have minor positive effects on SA objective 12 (biodiversity) as it requires sustainable design and construction (which will include green and brown walls), requires preservation of garden space, and preservation of trees which provide habitat for biodiversity.
- 7.111 Policy D1 design will have a minor positive effect on the objective for non-renewable resources as it requires development to be built to high standards of sustainable design and construction. With respect to SA objective 8 for using vacant land, policy D1 design includes a section on tall buildings, however this has a neutral effect as the policy identifies the borough as sensitive to tall buildings and requires case by case investigation of whether tall buildings are appropriate, that is, it does not promote nor specifically restrict tall buildings.
- 7.112 Policy D2 heritage will potentially have a minor **negative effect** on the Energy objective. The preservation of historic buildings or elements of historic buildings is often at odds with sustainability measures to increase energy efficiency. Sustainability measures include replacement windows, solar panels, and insulation including external wall cladding, all which can harm the heritage value of historic buildings. The Council seeks to mitigate these effects however by providing advice on the measures which achieve energy savings

while preserving historic buildings, including the Retrofitting Historic Buildings SPG and Energy Efficiency Planning Guidance.

7.113 Policy D2 Heritage may also have a minor **negative effect** on the housing objectives as the preservation of historic buildings may restrict the development potential of sites, and the number of new homes provided. The policy may also mean that older and less functional homes are retained. This policy may also have minor **negative effects** on the use of vacant land objectives as it encourages retention of buildings, e.g. positive contributors, listed buildings, and resists development that is out of character with the historic environment, both of which may result in the underuse of sites.

### **Summary and recommendations**

7.114 All design policies have shown to have both major and minor positive effects, in addition to some negative effects.

7.115 The appraisal shows that there are clear conflicts between policy D2 with SA objective 15 (to provide for the efficient use of energy). These conflicts are discussed above with mitigating measures already in place to address them.

### **Amenity**

A1 Managing development impacts

A4 Noise and vibration

### **Major positive effects**

7.116 The significant positive effects relate to amenity, where both policies seek to protect and maintain the amenities of existing and future residents in the borough.

7.117 Policy A4 would achieve major positive effects through ensuring that development sensitive to noise and vibration in locations with existing high levels of noise will only be acceptable when appropriate mitigation measures are provided. There may also be minor positive economic effects whereby the policy recognises that the continuance of business should not be unduly affected by the introduction of noise sensitive uses.

7.118 Policy A1 requires development to consider a number of factors connected to the amenities of existing occupiers and neighbours and the amenities of future occupiers. These factors affect the living conditions of residents in the borough, which has strong connections to health and general wellbeing.

### **Minor positive effects**

- 7.119 Minor positive effects connect to issues such as healthy living, reducing carbon emissions, protecting biodiversity and water quality.
- 7.120 The quality of homes in the borough is likely to be better when aspects such as noise and vibration, daylight/sunlight, outlook, and privacy are considered in the assessment of planning applications. This also has minor positive impacts on health and wellbeing of those living in accommodation where these requirements are applied.
- 7.121 Requirements for Transport Assessment and Travel Plans are likely to have minor to major positive effects, through encouraging sustainable means of travel such as walking and cycling, on reductions of carbon dioxide emissions and healthy living choices which both in turn help to reduce prevalence of cardiovascular and respiratory disease which is a priority area in the Council's Joint Strategic Needs Assessment. Travel Plans will also have minor to major positive effects on improving access to sustainable modes of transport. The degree of positive effects will be dependent on the scale, location and type of development and such effects are not considered permanent as other external factors may influence the degree of effects such as new building development, new bus routes/stations or other transport improvements.
- 7.122 Policy A1 requires the consideration of artificial sources of lighting which will likely have a minor positive effect in protecting natural habitats and biodiversity.
- 7.123 Construction Management Plans required by policy A1 are likely to have minor positive effects on sustainable construction and waste management. Requirement for limiting dust on demolition/construction sites will also have minor positive impact on maintaining local air quality.
- 7.124 Policy A1 will require investigative works and possibly remedial action on sites known to be contaminated such measures will ensure that residents, workers, visitors are not exposed to potential health risks. It will also ensure that remedial measures will not cause harm to water quality. These effects will be constrained to specific sites in the borough and once development occurs the effects would be permanent. We could increase the positive effects here by stating that the Council wants to ensure that development makes efficient use of existing vacant or underused buildings.

### **Summary and recommendations**

- 7.125 Both policies have shown to have major and minor positive effects. It is recommended that policy A1 includes reference to development making the most efficient use of vacant and underused buildings.

7.126 Both policies are not significantly different to those contained in the current LDF, although Transport Assessments and Travel Plans have been incorporated within policy A1, and therefore would not alter the current baseline situation or future trends. Without these policies to protect amenity there will likely be a worsening of effects on the amenities of residents, workers and visitors to the borough with associated impacts on health and wellbeing.

### **Open space and biodiversity**

A2 Provision, Protection and Enhancement of our Open spaces

A3 Biodiversity and trees

#### **Major positive effects**

7.127 Policies A2 Open space and A3 Biodiversity set 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, (SA objective 12). Policy A3 identifies the key areas of local and national importance from a habitat perspective recognising species protected under both UK and European legislation and links to Camden's Biodiversity Action Plan, which seek to enhance biodiversity. Policy A2 will have a major role to play in both protecting and providing more open space (SA objective 3) and can also assist in improving habitat spaces and a number of existing open spaces are SINC which play an important role in protecting biodiversity.

7.128 Policy A2 can have a major positive effect through the provision of publically accessible open space which can be particularly important for disadvantaged groups, who may not have access to private amenity space and can help tackle social exclusion (SA objective 4). There is potential for open spaces and nature reserves to have major social effects through encouraging the formation of 'friend' of spaces, educational learning opportunities and encouraging interactions and promoting resilience of communities (SA objective 4) which have strong links to promote healthy and safe communities as well as being providing opportunities for physical activity and general wellbeing (SA objective 2).

#### **Minor positive effects**

7.129 Policies A2 and A3 will likely have minor positive effects on a wide range of the SA objectives either directly or indirectly. The protection or provision of open space can potentially act as a buffer for noise sensitive uses and therefore enhance and improve amenity (SA objective 10). The protection of trees and vegetation can help assist in the management of surface water flooding, retain permeable surfaces and assist in Sustainable urban Drainage

Systems (SA objective 11), as well as increasing the proportion of vegetation, which assists in the improvement of local air quality.

7.130 Policy A2 will have positive effects on the provision of high quality open space which is vital to providing high quality townscapes in terms of providing relief from the built environment and can assist in protecting and enhancing the historic environment (SA objective 7 ii). The policy also encourages the community's identification of 'Local Green Spaces' through neighbourhood plans. These can potentially galvanise community action around green space enhancement projects.

7.131 Policy A3 seeks to safeguard natural green space through the protection and restoration of habitats. This policy will likely have minor positive effects in connection with SA objective 3, in increasing or improving open space. Linked to the retention and improvement of open space and habitats is the issue of encouraging more sustainable modes of travel such as walking and cycling, which is more likely to occur if the routes are attractive and green.

### **Summary and recommendations**

7.132 Both policies are shown to have minor and major positive effects when assessed with SA objectives and related criteria. Policy A2 seeks to ensure that all designated open spaces in the Borough (whether they are publically or privately accessible) receive a strong degree of protection. The policy also seeks to resist proposals adjacent to a designated open space which may harm the space's function or integrity or adversely affect the public's use and enjoyment of the space. In policy A3 the Council will seek to maximise opportunities for biodiversity enhancement, while protecting existing nature conservation sites.

## 8. Conclusions and monitoring

### Overall assessment

- 8.1 The assessment indicates that the draft Local Plan would deliver positive effects, as well as some negative effects, in relation to the SA objectives and criteria. The below presents a summary of appraisal findings at Local Plan Submission draft stage.
- 8.2 As noted above the effects of the Plan are broadly positive, although there are inevitably some tensions, tensions that have arisen include the following:
- The location and delivery of growth in the borough has the potential to negatively affect amenity, increase construction traffic and the character and appearance of Camden's conservation areas and heritage assets. While the policy itself will not help minimise impacts associated with development, the impacts will be mitigated through other policies within the plan
  - The improvement of strategic transport infrastructure will likely have temporary negative effects on amenity and community cohesion and while this will likely cause harm there would also be significant benefits to be enjoyed in the longer term. Camden is objecting to HS2 terminating at Euston, however the Euston Area Plan contains a number of strategies to mitigate the effects of the project, including the displacement of existing communities.
  - Policy T2 requires all future development to be car free. Those less mobile such older people and people with young children are associated with high car reliance as are people whose employment and skills requires vehicular use (e.g self-employed trades people) and as such the policy would not provide housing that meets their needs. It is estimated however that at least 90% of Camden's existing housing stock has parking provision. It is considered that the positive effects of policy TR2 on SA objectives 1 and 4 are considered to outweigh any negative effects.
  - The assessment has highlighted that there could possibly be negative impacts on the canal habitat, associated with the promotion of canal freight. The policy has been amended to require further consideration and evidence to be submitted with planning applications for canal freight.
  - The preservation of historic buildings and conservation areas are likely to restrict the development potential of sites, and the number of new homes provided. The policy may also mean that older and less functional homes are retained. However, the importance of protecting Camden's historic environment is recognised and areas that allow for growth are identified in the beginning of the Local Plan (policy G1).

- The assessment has shown conflicts between policies for sustainable design measures and the conservation and enhancement of conservation areas and the historic environment. There is a balance to be made here by ensuring that the benefits of sustainable measures are given weight, while we continue our approach in ensuring that we preserve the character and appearance of Camden's built environment. Further advice has also been recently published on the Council's website on the measures that achieve energy savings while preserving the historic environment.
- There is a continued conflict in promoting local energy generation and our aim to reduce poor air quality across the borough. The air quality policy CC4 notes that Combined Heat and Power and biomass boilers have serious air quality implications. To reduce these negative effects biomass boilers will be the least favoured option as a renewable energy source and we will only accept CHP in appropriate locations, which is guided by the borough's heat mapping study 2014. CHPs must also be the best in class in terms of NOx emissions and it must adhere to the latest emissions standards. An Air Quality Assessment with full dispersion modelling will also be required for all proposed CHP boilers which must demonstrate that its impact on nearby receptors is minimal.

#### **How the appraisal has influenced the Local Plan Submission draft to date**

- 8.3 The appraisal process highlighted where changes could be made to enhance the positive effects of the Local Plan. These changes have been incorporated into the Local Plan Submission draft wherever possible. The appraisal has also highlighted areas where there will be negative effects in relation to SA objectives and criteria and has guided inclusion of mitigation measures to eliminate or reduce these effects.
- 8.4 The production of the Local Plan and Sustainability Appraisal have been carried out in an iterative way, enabling the outcomes of the appraisal to be fed into the draft Local Plan objectives and policies. Key ways in which the sustainability appraisal process has informed the approach taken in the Local Plan include:
- Recommendations made regarding adjustments and additions to the Local plan objectives, in order to ensure that they address the full range of sustainability factors. These have been incorporated into the revised objectives contained in the Local Plan Submission draft;
  - Ensured structured consideration of alternatives / ensured consideration of alternatives has fed-in and influenced the development of a preferred policy approach for a range of key plan issues;

- Highlighted areas where the positive effects of draft policies could be further improved; and
  - Highlighted areas where the negative effects of the draft policies could be addressed.
- 8.5 The SA is not the only factor developing a draft strategy for Camden but it is a helpful tool in establishing whether the suggested approaches will foster sustainable development.

### Monitoring

- 8.6 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. Every year Camden monitors and analyses the performance of planning policies and publishes the details in the Authority Monitoring Report. The current AMR assesses performance for a range of areas, environmental factors include: air quality, open space, biodiversity, sustainable transport, heritage, sustainable drainage, waste, and renewable energy generation, housing, and economic factors such as employment and town centres. .

### What happens next?

- 8.7 This version of the Sustainability Appraisal is published alongside the Camden Local Plan Submission draft in order for representations to be made prior to submission to the Secretary of State. Representations will be considered by the Inspector during the Examination. At Examination, an appointed Planning Inspector will consider representations, including the SA report and other evidence before determining whether the Plan is found to be 'sound' (or requires modifications).
- 8.8 Once the Plan is found sound it will be formally adopted by the Council. At the time of adoption an SA Statement will be published which sets out measures decided for monitoring.

## Appendix A

### Compliance with SEA Directive

SEA requirement (as set out in EU Directive 2001/42/EC)	Where is it covered in the SA report?
a) An outline of contents, main objectives of the plan or programme and relationship with other plans and programmes	<ul style="list-style-type: none"> <li>• An outline of the contents of the Local Plan is set out in Chapter 3.</li> <li>• The vision and objectives of the plan are outlined in Chapter 3.</li> <li>• Appendix 1 of the SA Scoping Report outlines the relationship with other plans, programmes and policies. Table 1 of the SA report lists the plans, programmes and policies reviewed as part of the SA process.</li> </ul>
b) The relevant aspects of the current state of the environment and the likely evaluation thereof without implementation of the plan or programme	<ul style="list-style-type: none"> <li>• Appendix 2 of the SA Scoping Report outlines the baseline information for the borough. A summary of key issues is presented in Table 2 of the SA report.</li> <li>• The baseline information is summarised in chapter 4 of the SA report with an evaluation of the likely state of the environment without the plan.</li> </ul>
c) The environmental characteristics of the areas likely to be significantly affected	<ul style="list-style-type: none"> <li>• This is covered in Appendix 2 of the Scoping Report which identifies the key baseline information for the borough.</li> <li>• The baseline characteristics of the borough are also contained in chapter 4 of the SA report.</li> </ul>
d) any existing environmental problems which are relevant to the plan or programme including those relating to areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC (birds directive) and 92/43/EEC (habitats directive)	<ul style="list-style-type: none"> <li>• A Habitats Regulation Assessment screening has been carried out which concluded that the draft Local Plan is unlikely to have significant effects on sites of European importance for habitats or species, or an adverse impact on the integrity of those sites.</li> <li>• The baseline characteristics of the borough are also contained in chapter 4 of the SA report.</li> </ul>
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	<ul style="list-style-type: none"> <li>• These are set out in Appendix 1 of the SA Scoping Report, see also chapters 5, 6 and 7 of the SA report which briefly outlines how these have been considered in the preparation of the Proposed Submission draft Local Plan.</li> </ul>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors,	<ul style="list-style-type: none"> <li>• The appraisal findings are presented in chapters 6 – 8 of the SA.</li> </ul>

material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationships between these factors	
g) The measures envisaged to prevent, reduce and as full as possible offset any significant adverse effects on the environment of implementing the plan or programme	<ul style="list-style-type: none"> <li>• Mitigation measures are discussed in chapters 6 and 8 of this SA.</li> </ul>
h) Outline the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	<ul style="list-style-type: none"> <li>• Chapters 6 - 8 explain how understanding of options has been developed and refined over the course of the plan-making / SA process.</li> </ul>
i) A description of measures envisaged concerning monitoring	<ul style="list-style-type: none"> <li>• Proposed monitoring measures are summarised in chapter 8 of this SA Report.</li> </ul>
j) a non-technical summary of the information provided under the above headings	<ul style="list-style-type: none"> <li>• A non-technical summary is provided as a separate annex to this SA.</li> </ul>

## Appendix B

## 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"> <li>a) Will the Local Plan increase the supply of housing</li> <li>b) Will the Local Plan protect and promote affordable housing development</li> <li>c) Will the Local Plan provide housing for people, particularly families, on moderate and lower incomes?</li> <li>d) Will the Local Plan encourage development at an appropriate density, standard, size and mix?</li> <li>e) Will the Local Plan provide everybody with the opportunity to live in a better home?</li> </ul>
2	To promote a healthy and safe community	<ul style="list-style-type: none"> <li>a) Will the Local Plan promote healthy living through e.g. provision of walking, cycling and recreation facilities?</li> <li>b) Will the Local Plan help to promote safety and reduce levels of crime, anti-social behaviour and fear of crime?</li> <li>c) Will the Local Plan encourage improved provision of healthcare facilities in areas of need?</li> </ul>
3	To ensure access to local shopping, community, leisure facilities and open space	<ul style="list-style-type: none"> <li>a) Will the Local Plan encourage mixed-use development?</li> <li>b) Will the Local Plan encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</li> <li>c) Will the Local Plan encourage the location of services in proximity to public transport or increase access to services by public transport?</li> <li>d) Will the Local Plan help to protect, increase/improve open space?</li> </ul>
4	To tackle poverty and social exclusion and promote equal opportunities	<ul style="list-style-type: none"> <li>a) Will the Local Plan encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</li> <li>b) Will the Local Plan provide for equality of access for all to buildings and services?</li> <li>c) Will the Local Plan encourage development opportunities in those areas in need of economic development?</li> </ul>
5	To encourage and accommodate sustainable economic growth and employment opportunity	<ul style="list-style-type: none"> <li>a) Will the Local Plan encourage the retention and growth of existing, locally based industries?</li> <li>b) Will the Local Plan accommodate new and expanding businesses?</li> <li>c) Will the Local Plan encourage new investment in the local economy and promote development opportunities for employment?</li> <li>d) Will the Local Plan focus growth in growth areas, Central London and in town centres?</li> </ul>
6	To maximise the benefits of regeneration and development to promote sustainable communities	<ul style="list-style-type: none"> <li>a) Will the Local Plan encourage investment that will promote social wellbeing and benefit the economy?</li> <li>b) Will the Local Plan promote access to employment opportunities for local people?</li> </ul>

No.	Objective	Criteria
		<ul style="list-style-type: none"> <li>c) Will the Local Plan provide for adequate education facilities, including life-long learning?</li> <li>d) Will the Local Plan encourage housing development to meet the needs of the local people?</li> </ul>
7	<ul style="list-style-type: none"> <li>i - To promote high quality and sustainable urban design</li> <li>ii – To protect and enhance the historic environment</li> </ul>	<ul style="list-style-type: none"> <li>a) Will the Local Plan provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</li> <li>b) Will the Local Plan ensure enhancement of the public realm and local distinctiveness?</li> <li>c) Will the Local Plan ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value?</li> <li>d) Will the Local Plan encourage the use of sustainable design and construction?</li> </ul>
8	To ensure new development makes efficient use of land, buildings and infrastructure.	<ul style="list-style-type: none"> <li>a) Will the Local Plan encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</li> <li>b) Will the Local Plan ensure efficient use of land through maximising densities where appropriate?</li> </ul>
9	To reduce reliance on private transport modes and enhance permeability for non-motorised travellers.	<ul style="list-style-type: none"> <li>a) Will the Local Plan encourage development at locations that enable walking, cycling and/or the use of public transport?</li> <li>b) Will the Local Plan encourage the provision of infrastructure for walking, cycling and/or the provision of public transport?</li> <li>c) Will the Local Plan encourage access for all to public transport?</li> <li>d) Will the Local Plan encourage an increase in car free and car capped housing?</li> <li>e) Will the Local Plan encourage the transportation of freight by means other than road?</li> </ul>
10	To improve amenity by minimising the impacts associated with development	<ul style="list-style-type: none"> <li>a) Will the Local Plan ensure that the amenity of neighbours is not unduly impacted?</li> <li>b) Will the Local Plan ensure that development and operations will not affect noise sensitive uses?</li> </ul>
11	To protect and manage water resources and reduce surface water flood risk	<ul style="list-style-type: none"> <li>a) Will the Local Plan promote the sustainable use of water resources?</li> <li>b) Will the Local Plan encourage development that incorporates sustainable drainage?</li> <li>c) Does the Local Plan take into account potential flood risk in Camden?</li> <li>d) Will the Local Plan promote the protection and enhancement of the quality of Camden's waterways?</li> </ul>
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<ul style="list-style-type: none"> <li>a) Will the Local Plan protect and enhance natural habitats in the borough, particularly those of priority species (includes terrestrial and aquatic)?</li> <li>b) Will the Local Plan provide for the protection of biodiversity and open space in the borough?</li> <li>c) Will the Local Plan encourage the creation of new</li> </ul>

No.	Objective	Criteria
		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	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	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.	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 CO <sub>2</sub> and other greenhouse gas concentrations in the atmosphere?
16	To minimise the use of non-renewable resources.	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?



## Appendix C

### Alternative options appraisal

This appendix considers the following issues in turn, presenting an appraisal of alternative policy options for each.

Affordable sliding scale	Advertisements
Affordable housing tenure	Basements
HMO's	Local Green Space
Mix of house sizes	Public open space
Housing as priority use	Car parking
Student housing	Pubs
Employment land and buildings	Town centres
Industrial areas	

For each of the options the appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives / issues identified in the Scoping report. Effects are predicted taking into account the criteria presented within SEA Regulations. As such, account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for 'cumulative' effects are also considered.

Issue: Affordable housing sliding scale	Options		
	1	2	3
<b>Appraisal findings</b>			
<b>Option 1</b> Retain existing approach (i.e. sliding scale applies from 10 to 50 additional homes)			
Option 1 would have a minor positive impact on the housing objective as it would help us provide affordable housing with no risk to overall housing delivery. It would also have a minor positive impact on sustainable communities through promoting wellbeing and housing to meet local needs, and a minor positive impact on vacant land by maintaining development density.			
<i>Duration (short, medium, long-term): short-term and continuing, maintaining the current position should help to maintain housing and affordable housing outputs</i>			
<i>Geographic scale: borough wide</i>			
<i>Temporary/permanent: positive impacts should be permanent</i>			
<i>Cumulative effects: yes as additional homes and affordable housing can relieve pressure and improve conditions in the existing stock and help successive generations</i>			
<b>Option 2</b> Retain a sliding scale but condensed so that the maximum target applies to smaller schemes.			
This option would be likely to increase the provision of affordable housing but there is a risk that it would reduce the number of homes coming forward on small sites and the overall density and delivery of additional housing. It is therefore likely to have a major positive impact on poverty (social inclusion), but only a minor positive impact on sustainable communities (positive for wellbeing and local people's housing needs but not economic benefit) and housing (increased affordable housing but some reduction in output from small sites) and a neutral impact on vacant land/ maximising densities (due to some reduction in output from small sites).			
<i>Duration (short, medium, long-term): medium to long-term, the market will</i>			
<b>SA Objectives</b>			
1 Housing	+	+	0
2 Healthy communities	0	0	0
3 Community facilities	0	0	0
4 Poverty	+	++	++
5 Economic growth	0	0	0
6 Sustainable communities	+	+	+
7 Urban design i	0	0	0
7 Historic environment ii	0	0	0
8 Vacant land	+	0	-
9 Transport	0	0	0
10 Amenity	0	0	0
11 Water	0	0	0
12 Biodiversity	0	0	0
13 Waste	0	0	0
14 Air quality	0	0	0
15 Energy	0	0	0
16 Non-renewable resources	0	0	0

*take some time to adapt and deliver any additional affordable housing*  
*Geographic scale: borough wide*  
*Temporary/permanent: positive impacts on poverty should be permanent, any harm to housing delivery on small sites would be reversible as the policy could be changed to boost housing output*  
*Cumulative effects: yes as additional homes and affordable housing can relieve pressure and improve conditions in the existing stock and help successive generations*

**Option 3:** Set a flat affordable housing percentage target regardless of scheme size.

This option would theoretically increase the provision of affordable housing but would be very likely reduce the number of homes coming forward on small sites and the overall delivery of additional housing. It is therefore likely to have a major positive impact on poverty (social inclusion), but only a minor positive impact on sustainable communities (positive for wellbeing and local people's housing needs but not economic benefit), a neutral impact on housing (increased affordable housing at the expense of reduced overall housing outputs), and a minor negative impact on vacant land/ maximising densities (due to some reduction in output from small sites).

*Duration (short, medium, long-term): could be short-term negative impacts on housing output from small sites, additional affordable housing would only arise medium to long-term as market adapts*  
*Geographic scale: borough wide*  
*Temporary/permanent: positive impacts on poverty should be permanent, harm to housing delivery on small sites should be reversible as the policy could be changed to boost housing output*  
*Cumulative effects: yes, on the positive and the negative side - additional affordable housing can relieve pressure and improve conditions in the existing affordable stock, but reductions in housing delivery on small sites could worsen conditions and affordability in the existing market stock*

<b>Issue: Affordable housing tenure</b>	<b>Options</b>		
	<b>1</b>	<b>2</b>	<b>3</b>
NB it is anticipated that under each option the policy would retain the current flexibility to vary the tenure split in the light of viability.			
<b>Appraisal findings</b> (likely significant effects)			
<b>Option 1:</b> Current tenure split - 60% social-affordable rent 40% intermediate.			
This option achieves minor positive impacts on overall housing supply and tackling poverty and social exclusion.			
<i>Duration (short, medium, long-term): medium to long-term, the supply of new social-affordable only increases slowly</i>			
<i>Geographic scale: borough wide</i>			
<i>Temporary/permanent: reversible, tenures of new stock and tenure targets could change in future years</i>			
<i>Cumulative effects: yes, new social-affordable rented homes can relieve pressure and improve conditions in the existing stock and if retained can help a successive generations on low incomes</i>			
<b>Option 2:</b> increased proportion of social-affordable rented housing and reduced proportion of intermediate housing eg 70% social-affordable 30% intermediate.			
This option would likely perform best at tackling poverty and social exclusion, but with minor negative impacts on overall housing supply and economic growth.			
<i>Duration (short, medium, long-term): medium to long-term on poverty and social exclusion, the supply of new social-affordable only increases slowly, but could have a short to medium-term dampening effect on housing supply</i>			
<i>Geographic scale: borough wide</i>			
<i>Temporary/permanent: reversible, tenures of new stock and tenure targets could change in future years</i>			
<i>Cumulative effects: not for overall housing supply or growth as the market</i>			
	<b>SA Objectives</b>		
1 Housing	+	-	++
2 Healthy communities	0	0	0
3 Community facilities	0	0	0
4 Poverty	+	++	--
5 Economic growth	0	-	+
6 Sustainable communities	0	0	0
7 Urban design i	0	0	0
7 Historic environment ii	0	0	0
8 Vacant land	0	0	0
9 Transport	0	0	0
10 Amenity	0	0	0
11 Water	0	0	0
12 Biodiversity	0	0	0
13 Waste	0	0	0
14 Air quality	0	0	0
15 Energy	0	0	0
16 Non-renewable resources	0	0	0

*would adapt, but yes for poverty/ social exclusion as social-affordable rented homes can relieve pressure and improve conditions in the existing stock and if retained can help successive generations on low incomes*

**Option 3:** increased proportion of intermediate housing and reduced proportion of social-affordable rented housing eg equal 50/50% social-affordable and intermediate or 60% intermediate 40% social-affordable rent.

This option could lead to a major positive impact in terms of provision of more housing and affordable housing, with a minor positive impact on economic growth in terms of development activity and housing for middle-income groups. However, this option would be likely to have a major negative impact on poverty (social inclusion) objectives due to the reduced proportion of homes for social-affordable rent.

*Duration (short, medium, long-term): benefits to overall housing supply could be short to medium-term, impacts on poverty/ social inclusion could take longer but be more far-reaching*

*Geographic scale: borough wide*

*Temporary/permanent: reversible, tenures of new stock and tenure targets could change in future years*

*Cumulative effects: yes, would lead to steadily worse poverty/ social inclusion issues in the remaining social-affordable rented stock*

**All options** involve seeking a range of different tenure types and so are assessed as likely to have a neutral impact on sustainable communities (housing for local people).



<b>Issue: Houses in Multiple Occupation (HMOs)</b>	<b>Options</b>	
	<b>1</b>	<b>2</b>
<b>Appraisal findings</b> (likely significant effects)		
<b>Option 1:</b> Continue to protect existing HMOs		
This option potentially protects existing low rent accommodation in small bedsits suitable for people with a low income. Option 1 therefore has a positive impact on housing and poverty objectives/ disadvantaged groups.		
<i>Duration (short, medium, long-term): short and medium term, but in the longer term the market could change to provide other housing options for those on low incomes, or government policy could over-ride the protection as it has with Use Class C4 HMOs</i>		
<i>Geographic scale: borough wide</i>		
<i>Temporary/permanent: reversible, protection could be removed in future</i>		
<i>Cumulative effects: no</i>		
<b>Option 2:</b> Allow HMOs to be converted to self-contained housing.		
This option could potentially see:		
(a) a reduction in the number of homes in some cases as a group of bedsits forming an HMO could be combined to form a single family home; and		
(b) an increase in the quality of individual bedsits in some cases where each bedsit is provided with its own self-contained amenities and facilities.		
The overall impact of Option 2 on the housing objective is likely to be neutral. However, this option is likely to lead to higher rents and reduce the availability of housing to those on low incomes and so it has a negative impact on disadvantaged groups and the poverty objective.		
<i>Duration (short, medium, long-term): medium term, if protection was removed there would likely to be a gradual rather than sudden loss of HMO stock</i>		
<i>Geographic scale: borough wide</i>		
<i>Temporary/permanent: not reversible, once lost it is unlikely that HMOs would be replaced</i>		
<i>Cumulative effects: yes, as the number of HMOs reduced the rents for those remaining would be likely to rise</i>		
	<b>SA Objectives</b>	
	1 Housing	0
	2 Healthy communities	0
	3 Community facilities	0
	4 Poverty	-
	5 Economic growth	0
	6 Sustainable communities	0
	7 Urban design i	0
	7 Historic environment ii	0
	8 Vacant land	0
	9 Transport	0
	10 Amenity	0
	11 Water	0
	12 Biodiversity	0
	13 Waste	0
	14 Air quality	0
	15 Energy	0
	16 Non-renewable resources	0



<p><i>Temporary/permanent: reversible, additions to the housing stock are marginal (1% or less each year) and the balance between small and large homes could be altered by a future policy change</i></p> <p><i>Cumulative effects: yes, in the longer term a skew towards provision of small market homes would increase pressure and cost of the existing stock of larger homes</i></p>	
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### Issue: Housing as priority use

#### Appraisal findings (likely significant effects)

#### Option 1: prioritise self-contained housing

Option 1 would be likely to have a major positive impact on housing provision as it will help us to secure a wide variety of housing types to suit everyone, including families on moderate and lower incomes. Option 1 would have a minor positive impact on the poverty objective (social cohesion) by securing housing suitable for people on lower incomes, and a minor positive impact on sustainable communities (needs of local people) by specifically prioritising self-contained homes.

Both options would have a minor negative impact on the employment growth objective by prioritising housing rather than business.

*Duration (short, medium, long-term): medium to long-term, there is already a substantial pipeline of permitted student housing schemes so it would take some time for the balance to shift towards self-contained housing*

*Geographic scale: Borough-wide, possibly with more impact in Central London as a favoured location for student housing*

*Temporary/permanent: reversible, additions to the housing stock are marginal (1% or less each year) and the balance between student and self-contained housing could be altered by a future policy change*

*Cumulative effects: no*

#### Option 2: prioritise all housing, including student housing

Option 2 would be likely to have a minor positive impact on the objective relating to housing provision as it should help us to increase overall supply, but this would be likely to involve a high proportion of single person student rooms and fail to significantly increase the supply of homes for families on moderate and lower incomes. Option 2 would have a minor positive impact on the poverty objective (social cohesion) by promoting specialist housing managed for students and freeing up privately rented homes to meet general needs. Option 2 would also have a minor positive impact on the objective relating to reduced reliance on private transport (access to public transport),

SA Objectives	Options	
	1	2
1 Housing	++	+
2 Healthy communities	0	0
3 Community facilities	0	0
4 Poverty	+	+
5 Economic growth	-	-
6 Sustainable communities	+	-
7 Urban design i	0	0
7 Historic environment ii	0	0
8 Vacant land	0	0
9 Transport	0	0
10 Amenity	0	0
11 Water	0	0
12 Biodiversity	0	0
13 Waste	0	0
14 Air quality	0	0
15 Energy	0	0
16 Non-renewable resources	0	0

as public transport accessibility is an explicit consideration in student housing policy.

Both options would have a minor negative impact on the employment growth objective by prioritising housing rather than business.

*Duration (short, medium, long-term): short-term and continuing*

*Geographic scale: Borough-wide, possibly with more impact in Central London as a favoured location for student housing*

*Temporary/permanent: reversible, additions to the housing stock are marginal (1% or less each year) and the balance between student and self-contained housing could be altered by a future policy change*

*Cumulative effects: no*



**Issue: Student housing****Appraisal findings** (likely significant effects)**Option 1:**

- a) resist development that would prejudice meeting the self-contained target or involve loss of an allocated site  
 b) allow the market to operate freely to respond to the relative demand for student housing and other types of housing

Option 1A would potentially lead to an increase in housing available for everybody rather than just students and housing to meet local needs, giving a positive impact on housing and sustainable communities objectives, but could limit the growth of the higher education sector, with a negative impact on economic growth objectives. Option 1B would potentially have the reverse effect, positive for economic growth but negative for housing and sustainable communities objectives.

*Duration (short, medium, long-term): short-term for housing, potentially longer-term for the economy*

*Geographic scale: Borough-wide*

*Temporary/permanent: impacts on housing are likely to be reversible, impacts on the higher education sector could be permanent*

*Cumulative effects: yes, suppressing the growth of the higher education sector could lead to decline or relocation outside the borough*

**Option 2:**

- a) continue to protect existing student housing  
 b) allow student housing to be converted to self-contained housing

Option 2A could potentially prevent the improvement of the existing student housing stock, with a negative impact on housing objectives, but would be likely to secure continued availability of student housing with a positive impact on economic growth objectives. Option 2B could lead to loss of student housing and higher education growth, but could potentially provide better housing for a wider range of occupiers, with a negative impact on economic growth objectives and a positive impact on housing objectives.

*Duration (short, medium, long-term): short-term in terms of housing available to particular groups as occupation can change in the future*

SA Objectives	Options			
	1A	1B	2A	2B
1 Housing	+	-	-	+
2 Healthy communities	0	0	0	0
3 Community facilities	0	0	0	0
4 Poverty	0	0	0	0
5 Economic growth	-	+	+	-
6 Sustainable communities	+	-	0	0
7 Urban design i	0	0	0	0
7 Historic environment ii	0	0	0	0
8 Vacant land	0	0	0	0
9 Transport	0	0	0	0
10 Amenity	0	0	0	0
11 Water	0	0	0	0
12 Biodiversity	0	0	0	0
13 Waste	0	0	0	0
14 Air quality	0	0	0	0
15 Energy	0	0	0	0
16 Non-renewable resources	0	0	0	0

<p><i>Geographic scale: Borough-wide with some concentrations eg Bloomsbury, King's Cross</i></p> <p><i>Temporary/permanent: temporary/ reversible, student housing could potentially be converted for other occupiers in the future, and new student housing could replace the existing stock</i></p> <p><i>Cumulative effects: no</i></p>	
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## Issue: Employment land and buildings

### Appraisal findings (likely significant effects)

**Option 1:** The current approach is to retain land and buildings suitable for continued business use.

This option could have a positive impact on sustainable communities as the aim of this approach is to maintain the supply of employment land/buildings which are suitable for continued use (i.e. sustainable). Economic growth is also supported with this option as it allows for the retention of business premises which in turn provide employment opportunities.

*Duration (short, medium, long-term):* Medium term

*Geographic scale:* borough wide

*Temporary/permanent:* reversible

*Cumulative effects?* No

**Option 2:** Allowing market to intervene with greater flexibility. Provide less protection of employment uses in the borough

This option will have positive impact on the housing generation as land for housing is more valuable than employment land in the borough. However, it will probably have a negative impact on amenity particularly in areas predominantly occupied by employment uses. Loss of employment floorspace could also have a negative impact on the local/regional economy given the importance of Camden's economy to London and the UK.

*Duration (short, medium, long-term):*

*Geographic scale:* borough wide

*Temporary/permanent:* not reversible

*Cumulative effects?* Allowing permanent loss of employment floorspace cumulatively will have a negative effect on the economy but could positively affect housing supply.

**Option 3:** Consider proposals for the intensification and/or redevelopment of employment sites and premises if the proposals can provide significant additional employment and other benefits.

This option allows for more efficient use of Camden's limited land by considering proposals which increase the provision of employment provision and introduce additional benefits thus supporting economic growth. This option would also help create additional employment opportunities for local residents, including training and apprenticeships.

*Duration (short, medium, long-term):* long-term

SA Objectives	Options		
	1	2	3
1 Housing	0	++	+
2 Healthy communities	+	-	+
3 Community facilities	0	+	+
4 Poverty	0	0	+
5 Economic growth	+	--	++
6 Sustainable communities	+	0	+
7 Urban design i	0	0	0
7 Historic environment ii	0	0	0
8 Vacant land efficient use?	0	++	++
9 Transport	0	+	+
10 Amenity	0	-	-
11 Water	0	0	0
12 Biodiversity	0	0	0
13 Waste	0	0	0
14 Air quality	0	0	0
15 Energy	0	0	0
16 Non-renewable resources	0	0	0

<p><i>Geographic scale: Borough</i> <i>Temporary/permanent: permanent</i> <i>Cumulative effects? Yes. Positive cumulative economic benefits as well as responding to current and future business needs.</i></p>	
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## Issue: Industrial areas

**Appraisal findings** (likely significant effects)

### Option 1: Continue to protect the Industrial Area

Option 1 could have minor positive impact on the economic growth as the aim of this approach is to maintain the supply of employment land/buildings which are suitable for continued use providing the much needed employment opportunities. Protecting the Industry Area from any sort of non-industrial/warehousing development will limit the amount of new development needed to support the growth in Camden.

**Duration (short, medium, long-term):** medium

**Geographic scale:** Industry area

**Temporary/permanent:**

### Option 2: Intensify uses as part of planned comprehensive development within the Industrial Area whilst introducing other uses such as housing and offices.

This option would have positive impacts on maintaining and creating jobs in the area, possible future housing provision, community facilities, efficient use of the limited land supply, new design and sustainability measures which are all needed to support Camden's growth. This option assumes that the Regis Road recycling centre is either not affected by the intensification or is provided at an alternative site without the loss of capacity. This option also allows for intensification of employment uses which allows for increases in employment floorspace needed to support economic growth.

**Duration (short, medium, long-term):** Medium to long-term

**Geographic scale:** Industry area

**Temporary/permanent:** permanent (once industrial land is lost to other uses it is unlikely to be reverted back to industrial land)

SA Objectives	Options	
	1	2
1 Housing	0	+
2 Healthy communities	+	+
3 Community facilities	0	+
4 Poverty	0	+
5 Economic growth	+	++
6 Sustainable communities	+	+
7 Urban design i	0	0
7 Historic environment ii	0	0
8 Vacant land	0	++
9 Transport	0	+
10 Amenity	0	-
11 Water	0	0
12 Biodiversity	0	0
13 Waste	0	0
14 Air quality	0	0
15 Energy	0	+
16 Non-renewable resources	0	+

### Issue: Advertisements

#### Appraisal findings (likely significant effects)

**Option 1:** Create a new policy for adverts which uses the content from current Camden Planning Guidance

#### Commentary paragraph –

Option 1 continues the Councils current approach to advertisements. By adding a separate policy for advertisements in the development plan document (not just supplementary planning document) the Council will be in a stronger position if challenged in appeal.

**Option 2:** Create a new policy for adverts which is based on the Camden Planning Guidance approach but also which sets out some areas where the Council may accept certain kinds of advertisements

#### Commentary paragraph –

A less restrictive approach to adverts would likely cause harm to the amenity of the borough. The trade-off would be that the Council may be able to take advantage of new opportunities and to generate some income from advertisements.

The effects (more adverts, more harm) would be very long in duration. The effects would be borough wide, but unevenly spread depending on the wording of the policy e.g. whether it affected CAs or not.

Adverts can be used by local groups and businesses to generate income. The amount of income is probably a very minor proportion of the budget of any organisation and we have therefore deemed it too trivial to include in the assessment.

SA Objectives	Options	
	1	2
1 Housing	0	0
2 Healthy communities	0	0
3 Community facilities	0	0
4 Poverty	0	0
5 Economic growth	-	0
6 Sustainable communities	-	0
7 Urban design i	++	--
7 Historic environment ii	++	
8 Vacant land	0	0
9 Transport	0	0
10 Amenity	+	0
11 Water	0	0
12 Biodiversity	0	0
13 Waste	0	0
14 Air quality	0	0
15 Energy	0	0
16 Non-renewable resources	0	0



Issue: Local Green Space	Options	
Appraisal findings (likely significant effects)	1	2
<b>Option 1:</b> Promote the principle of designating Local Green Space		
Commentary paragraph –		
<p>Local green spaces are a new designation introduced by the National Planning Policy Framework (NPPF). They allow local communities more say in shaping their surroundings and therefore seem to closely align with the objectives for Neighbourhood Plans and Community Right to Build Orders. Like neighbourhood planning, Local Green Space designation is discretionary. The NPPF and advice in the Planning Practice Guidance sets out the circumstances in which this designation can be used. They enjoy a strong level of protection and identified in the NPPF, with restrictive designations such as Green Belts and National Parks, as somewhere development should be restricted.</p> <p>Amenity – if general amenity rather than devt impact then would be positive</p> <p><i>Duration (short, medium, long-term): option would be subject to the identification of local green spaces in neighbourhood plans and the timescales for these documents. A significant part of Camden has designated neighbourhood areas and forums and it is expected that communities will draw on local knowledge and community engagement to identify spaces which are demonstrably special to local people and meet the criteria set out in the National Planning Policy Framework (NPPF). In the short-term there will be benefits in those communities which have been able to identify and successfully justify the inclusion of local green spaces within their neighbourhood plan. Over the medium to long term it is reasonable to conclude that other neighbourhood forums will take up the opportunity to identify local green spaces if they consider the designation has achieved beneficial effects elsewhere.</i></p> <p><i>Geographic scale: it is proposed this designation will only be used where a neighbourhood plan is being developed. It will only be relevant to green spaces that meet the criteria set out in the NPPF and is targeted at green spaces which do not already enjoy a high level of protection through other</i></p>	-	-
	+	+
	+	+
	0	0
	0	0
	0	0
	+	+
	+	+
	0	0
	0	0
	0	0
	0	0
	+	+
	0	0
	+	+
	0	0
	0	0

*designations (e.g. Metropolitan Open Land).*

*Temporary/permanent: Local Green Spaces are intended rule out development other than in very special circumstances – their strength of protection in part derives from their degree of permanency. Once designated, they are only likely to be removed through a future review of a neighbourhood plan / the Local Plan.*

**Option 2:** Identify specific areas as Local Green Space in the Local Plan Commentary paragraph –

Local green space designation does not depend solely on the preparation of a neighbourhood plan. They may also be identified through the Local Plan. This can potentially be useful where a community has not come forward to designate a Local Plan. Local Green Spaces can only be identified when a plan is either being prepared or reviewed.

However, it would be necessary for the Local Planning Authority to gather sufficient supporting evidence to justify a designation. Para. 76 of the NPPF states Local Green Spaces should be of “particular importance to them”. They should “be in reasonably close proximity” to the community they serve and be “local in character” and “demonstrably special to the local community (para. 77). These are subjective considerations and rely very heavily on the value the community itself places on individual green spaces.

*Duration (short, medium, long-term):option to be designated would need to be made through the Local Plan. Designation would be subject to the Local Plan’s production timetable. This will potentially produce positive benefits where Local Green Spaces are identified by the Council in areas without neighbourhood forums or where the neighbourhood plan timetable extends beyond the Local Plan’s adoption (scheduled for 2016).*

*Geographic scale: it is proposed this designation will only be used where a neighbourhood plan is being developed. It will only be relevant to green spaces that meet the criteria set out in the NPPF and is targeted at green spaces which do not already enjoy a high level of protection through other designations (e.g. Metropolitan Open Land). Designation is likely to occur where the Council is able to demonstrate the space provides particular community benefit and is important to a community. There would be no need for the Council to consult on designations within neighbourhood areas unless there was evidence to suggest the Local Plan would be a better tool*

<p><i>for making the designation, e.g. timetables for the Local Plan and neighbourhood plan do not coincide.</i></p> <p><i>Temporary/permanent: Local Green Spaces are intended rule out development other than in very special circumstances – their strength of protection in part derives from their degree of permanency. Once designated, they are only likely to be removed through a future review of a neighbourhood plan / the Local Plan.</i></p>	
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Issue: Public Open Space	Options																																																							
	1	2																																																						
<p><b>Appraisal findings</b> (likely significant effects)</p> <p><b>Option 1:</b> Maintain existing public open space provision standards of 9m<sup>2</sup> per person?</p> <p>Option 1 would be likely to have a minor positive impact on objectives relating to health, community facilities, urban design, water, biodiversity and air quality. Open spaces can improve the layout of new developments, setting of the built environment and contribute to opportunities for recreation, sustainable drainage, species diversity and carbon capture.</p> <p>Option 1 would have a neutral impact on the amenity objective as the objective relates to the impact of development on neighbours/ noise sensitive uses.</p> <p><i>Duration (short, medium, long-term): option would impact in the long term as open space additions and improvements would take some years to accrue.</i></p> <p><i>Geographic scale: boroughwide</i></p> <p><i>Temporary/permanent: permanent impact on availability/ quality of open space</i></p> <p><i>Cumulative effects? Additions to open space would become more significant over time</i></p> <p><b>Option 2:</b> Increase our public open space targets to 13m<sup>2</sup> per person as recommended by Atkins for residential?</p> <p>Option 2 would be likely to have a major positive impact on objectives relating to health and community facilities as it would increase the provision of open space and opportunities for recreation.</p> <p>Option 2 would be likely to have a minor positive impact on objectives relating to urban design, water, biodiversity and air quality. Open spaces can improve the layout of new developments and contribute to opportunities for recreation, sustainable drainage, species diversity and carbon capture.</p> <p>Option 2 would be likely to have a minor negative impact on objectives relating to housing and vacant land as it would reduce the viability of residential development and reduce the efficient use of land by lowering development densities.</p>	<table border="1"> <thead> <tr> <th>SA Objectives</th> <th>1</th> <th>2</th> </tr> </thead> <tbody> <tr> <td>1 Housing</td> <td>0</td> <td>0/-</td> </tr> <tr> <td>2 Healthy communities</td> <td>+</td> <td>++</td> </tr> <tr> <td>3 Community facilities</td> <td>+</td> <td>++</td> </tr> <tr> <td>4 Poverty</td> <td>0</td> <td>0</td> </tr> <tr> <td>5 Economic growth</td> <td>0</td> <td>0</td> </tr> <tr> <td>6 Sustainable communities</td> <td>0</td> <td>0</td> </tr> <tr> <td>7 Urban design i</td> <td>+</td> <td>+</td> </tr> <tr> <td>7 Historic environment ii</td> <td>+</td> <td>+</td> </tr> <tr> <td>8 Vacant land</td> <td>0</td> <td>0 /-</td> </tr> <tr> <td>9 Transport</td> <td>0</td> <td>0</td> </tr> <tr> <td>10 Amenity</td> <td>0</td> <td>0</td> </tr> <tr> <td>11 Water</td> <td>+</td> <td>+</td> </tr> <tr> <td>12 Biodiversity</td> <td>+</td> <td>+</td> </tr> <tr> <td>13 Waste</td> <td>0</td> <td>0</td> </tr> <tr> <td>14 Air quality</td> <td>+</td> <td>+</td> </tr> <tr> <td>15 Energy</td> <td>0</td> <td>0</td> </tr> <tr> <td>16 Non-renewable resources</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	SA Objectives	1	2	1 Housing	0	0/-	2 Healthy communities	+	++	3 Community facilities	+	++	4 Poverty	0	0	5 Economic growth	0	0	6 Sustainable communities	0	0	7 Urban design i	+	+	7 Historic environment ii	+	+	8 Vacant land	0	0 /-	9 Transport	0	0	10 Amenity	0	0	11 Water	+	+	12 Biodiversity	+	+	13 Waste	0	0	14 Air quality	+	+	15 Energy	0	0	16 Non-renewable resources	0	0	
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11 Water	+	+																																																						
12 Biodiversity	+	+																																																						
13 Waste	0	0																																																						
14 Air quality	+	+																																																						
15 Energy	0	0																																																						
16 Non-renewable resources	0	0																																																						

*Duration (short, medium, long-term): option would impact in the medium to long term as open space additions and improvements would take some years to accrue.*

*Geographic scale: boroughwide*

*Temporary/permanent: permanent impact on availability/ quality of open space, temporary impact on viability/ density until development industry finds creative ways of providing the space without loss of land eg roofspaces*

*Cumulative effects? Additions to open space would become more significant over time.*

## Issue: Car parking

**Appraisal findings** (likely significant effects)

### Option 1: Introduce car-free across the whole of the borough

Land previously in use as car parking has the potential to be used for more beneficial purposes such as housing, employment, community facilities and open space.

Car free development will also improve the quality of the public realm, resulting in improved conditions for pedestrians and cyclists. Both these forms of transport are available to everyone and thus promote the growth of healthy and sustainable communities.

Surface run-off from hard standing can create additional pressure upon water networks. Gardens given over to hard standing to create residential off street parking can also result in the loss of habitats.

Reducing congestion will also provide environmental and amenity benefits. Amenity benefits include reduced noise. The policy will provide huge benefits with regards to improving air quality and reducing heat island affect. Energy is often wasted cooling buildings affected by the heat island, particularly in the south of the borough. A car free policy will also greatly reduce reliance upon non-renewable fuel sources.

It is noted however that car free development could create difficulties for some vulnerable groups (such as elderly people and people with young children) to access facilities and services. Disabled people will still be allocated parking spaces however.

*Duration (short, medium, long-term): long-term*

*Geographic scale: whole borough*

*Temporary/permanent: permanent*

### Option 2: Introduce car-free housing for additional parts of the borough and car-capped housing for areas with lower PTAL ratings

Option 2 provides the same social, economic & environmental benefits of

SA Objectives	1	2
1 Housing	++	+
2 Healthy communities	++	+
3 Community facilities	+	0
4 Poverty	0	0
5 Economic growth	++	+
6 Sustainable communities	0	0
7 Urban design i	++	+
7 Historic environment ii	++	+
8 Vacant land	+	+
9 Transport	++	++
10 Amenity	+	0
11 Water	+	0
12 Biodiversity	+	0
13 Waste	0	0
14 Air quality	++	+
15 Energy	++	+
16 Non-renewable resources	++	+

option 1, but at a reduced scale. The policy offers more flexibility than that of option 1 and will benefit groups and locations reliant upon car use.

*Duration (short, medium, long-term): long term*

*Geographic scale: majority of borough*

*Temporary/permanent: permanent*

**Issue: Pubs****Appraisal findings** (likely significant effects)

**Option 1:** Continue to resist the change of use of pubs that serve a community role

Resisting changes of use from pubs to housing will restrict the increase of housing in the borough however, the scale to which this will impact overall housing supply is limited in consideration of the number of pubs that has the potential to convert into housing in the borough.

By retaining pubs that serve a community role we would ensure that access to such facilities is maintained, supporting SA objective 3. Pubs are often spaces that allow for social cohesion in the local community and considered important in Camden where the dense built environment tends to have a negative effect on social interaction in a community.

Pubs are part of Camden's built fabric in terms of mix of uses but also part of its historic character and appearance. By retaining pubs we would ensure the protection of local distinctiveness, conservation areas and listed buildings.

There may be instances where there are areas of a high concentration of licensed premises where the Council will not seek to take such a restrictive approach due to amenity concerns.

*Geographic scale: dependent on where in the borough and different areas within the borough*

*Temporary/permanent: reversible*

**Option 2:** Greater restriction on the change of use of pubs that are important to the local community and are of historic value

As above but to a more significant extent.

SA Objectives	Options	
	1	2
1 Housing	0/-	0/-
2 Healthy communities	0	0
3 Community facilities	+	+
4 Poverty	+	+
5 Economic growth	+	+
6 Sustainable communities	+	+
7 Urban design i	+	+
7 Historic environment	+	++
8 Vacant land	0	0
9 Transport	0	0
10 Amenity	0/-	0/-
11 Water	0	0
12 Biodiversity	0	0
13 Waste	0	0
14 Air quality	0	0
15 Energy	0	0
16 Non-renewable resources	0	0

### Issue: Town centres

#### Appraisal findings (likely significant effects)

- Option 1:** - Maintain high proportion of A1 shops  
- Maintain low proportions of A3, A4, A5 uses

This is the current approach. Many centres fall short of the current targets.

As retailing structurally changes there is a risk that A1 shop units will become surplus, vacant, and will not add to the vitality and viability of centres.

Restrictive policies mean no flexibility to change uses in premises, leading to fewer opportunities for new traders to enter town centres and revitalise the offer.

- Option 2:** - Allow lower proportion of A1 shops  
- Allow higher proportions of A3, A4, A5 uses

More freedom to change between uses classes. Still maintains a minimum proportion of A1 and maximum proportion of A3, A4, and A5 but are less restrictive levels than at present.

Will likely result in more food, drink, and entertainment uses in town centres. Allow the market to respond more flexibly to demand. A minimum proportion of A1 would still be retained to protect the retail function of primary frontages.

Increased or clustered food, drink, and entertainment uses could potentially negatively impact residential amenity in some areas.

#### Option 3:

- Maintain high proportion of A1 shops on primary frontages
- Allow shift to higher proportions of A3, A4, A5 uses on secondary frontages

Retain a higher proportion of retail on core frontages to support the retail offer and function of centres, and supply of shop units for small and independent traders.

SA Objectives	Options		
	1	2	3
1 Housing	0	0	0
2 Healthy communities	0	0	0
3 Community facilities	0	0	0
4 Poverty	0	0	0
5 Economic growth	+	+	++
6 Sustainable communities	+	+	++
7 Urban design i	0	0	0
7 Historic environment ii	0	0	0
8 Vacant land	+	+	+
9 Transport	0	0	0
10 Amenity	+	-	-
11 Water	0	0	0
12 Biodiversity	0	0	0
13 Waste	0	0	0
14 Air quality	0	0	0
15 Energy	0	0	0
16 Non-renewable resources	0	0	0

Greater flexibility on the secondary frontages, which is likely to result in a greater number of food, drink, entertainment and other uses which will broaden and diversify the offer of centres, attract people to the area and support activity into the evenings.

Increased or clustered food, drink, and entertainment uses could negatively impact residential amenity in some areas.

## Appendix D

### Preferred approach appraisal

For each of the grouped themes (Spatial strategy, Housing, Community health and wellbeing, Design and heritage, Town centres and shopping, Economy and employment, Transport, Sustainability, Amenity, Open space and biodiversity) the appraisal identifies and evaluates the likely significant effects on the baseline, drawing on the sustainability topics / objectives / issues identified in the Scoping Report. Effects are predicted taking into account the criteria presented within SEA Regulations. As such, account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for 'cumulative' effects is also considered.

## Spatial Strategy

G1a) Delivering growth and G1b) Location of growth

	Delivering Growth	Location of growth
SA Objectives	G1a	G1b
1 Housing	++	++
2 Healthy communities	+	+
3 Community facilities	+	+
4 Poverty	+	+
5 Economic growth	++	++
6 Sustainable communities	++	++
7 Urban design i	+	0
7 Historic environment ii	0/-	0
8 Vacant land	++	++
9 Transport	+	++
10 Amenity	0	-/0
11 Water	0	0
12 Biodiversity	0	0
13 Waste	0	0
14 Air quality	0/-	-
15 Energy	0	+
16 Non-renewable resources	+	+

## Housing

H1 Maximising housing supply

H2 Maximising the supply of self – contained housing from mixed use schemes

H3 Protecting existing homes

H4 Maximising the supply of affordable housing

H5 Protecting and improving affordable housing

H6 Housing choice and mix

	Housing policies					
SA Objectives	H1	H2	H3	H4	H5	H6
1 Housing	+	+	+	++	+	++
2 Healthy communities	0	+	+	0	0	0
3 Community facilities	+	+	+	0	0	0
4 Poverty	0	0	0	+	+	+
5 Economic growth	0	0	0	0	0	0
6 Sustainable communities	+	+	0	+	+	+
7 Urban design i	0	0	0	0	0	0
7 Historic environment ii	0	0	0	0	0	0
8 Vacant land	++	0	+	+	+	0

9 Transport	0	+	0	0/+	0	0
10 Amenity	0	0	0	0	0	0
11 Water	0	0	0	0	0	0
12 Biodiversity	0	0	0	0	0	0
13 Waste	0	0	0	0	0	0
14 Air quality	0	+	0	0/+	0	0
15 Energy	0	0	0	0	0	0
16 Non-renewable resources	+	0	0	0	0	0

H7 Large and small homes

H8 Housing for older people, homeless people and vulnerable people

H9 Student housing

H10 Homes with shared facilities ('houses in multiple occupation')

H11 Accommodation for travellers

	Housing policies				
SA Objectives	H7	H8	H9	H10	H11
1 Housing	+	+	+	+	+

2 Healthy communities	0	+	0	0	0
3 Community facilities	0	0	0	0	0
4 Poverty	+	+	+	0	++
5 Economic growth	0	0	0	0	0
6 Sustainable communities	+	+	+	0	+
7 Urban design i	0	0	0	0	+
7 Historic environment ii	0	0	0	0	0
8 Vacant land	+	0	0	+	0
9 Transport	0	+	+	0	+
10 Amenity	0	+	+	+	+
11 Water	0	0	0	0	0
12 Biodiversity	0	0	0	0	0
13 Waste	0	0	0	0	0
14 Air quality	0	+	+	0	+
15 Energy	0	0	0	0	0
16 Non-renewable resources	+	0	0	+	0

## Community, health and wellbeing

C1 Improving and promoting Camden's health and wellbeing

C2 Community facilities

C3 Cultural and leisure facilities

C4 Pubs

C5 Safety and security

C6 Access

	Community and health policies					
SA Objectives	C1	C2	C3	C4	C5	C6
1 Housing	0/+	0	0	0	0	+
2 Healthy communities	++	++	0	0	++	0
3 Community facilities	+	++	++	+	0	0
4 Poverty	+	+?	+	+	+	++
5 Economic growth	0	+	0	+	0	0
6 Sustainable communities	0	++	+	+	0	+
7 Urban design i	+	0	0	+++?	+	0
7 Historic environment ii	+	0	0	++	0	0
8 Vacant land	0	+	+	+	0	0

9 Transport	+	+	+	0	0	+
10 Amenity	+?	0	0	0	0	+
11 Water	0	0	0	0	0	0
12 Biodiversity	+	0	0	0	0	0
13 Waste	0	0	0	0	0	0
14 Air quality	0	0	0	0	0	0
15 Energy	+	0	0	0	0	0
16 Non-renewable resources	0	0	0	0	0	0

## Design and heritage

D1 Design

D2 Heritage and conservation

D3 Shopfronts

D4 Advertisements

A5 Basements and lightwells

	Design and heritage policies				
SA Objectives	D1 Design	D2 Heritage and	D3 Shopfronts	D4	A5 Basements

		conservation		Advertisements	and lightwells
1 Housing	+	-	0	0	0
2 Healthy communities	+	0	+	0	0
3 Community facilities	0	0	0	0	0
4 Poverty	0	0	0	0	0
5 Economic growth	0	0	0	0	0
6 Sustainable communities	0	0	0	0	0
7 Urban design i	++	+	++	+	+
7 Historic environment ii	+	++	++	+	+
8 Vacant land	0	-	0	0	0
9 Transport	0	0	0	0	0
10 Amenity	0	0	0	0	+
11 Water	0/+	0	0	0	+
12 Biodiversity	+	0	0	0	+
13 Waste	0	0	0	0	0
14 Air quality	0	0	0	0	0
15 Energy	0	-	0	0	0
16 Non-renewable resources	+	0	0	0	0

## Town centres and shopping

### Preferred policy approach appraisal

TC1 Distribution of retail

TC2 Protecting and enhancing Camden's centres

TC3 Small and independent shops

TC4 Markets and areas of specialist shopping

TC5 Food, drink, entertainment and other town centre uses

TC6 Markets

	Town centres and shopping policies					
SA Objectives	TC1	TC2	TC3	TC4	TC5	TC6
1 Housing	0	+	0	0	0	0
2 Healthy communities	+	+	+	+	0	0
3 Community facilities	++	++	+	0	+	+
4 Poverty	0	0	0	0	0	++
5 Economic growth	+	0	0	0	++	++
6 Sustainable communities	+	0	0	0	0	0
7 Urban design i	0	+	0	0	0	0
7 Historic environment ii	0	0	0	0	0	0

8 Vacant land	+	0	0	0	0	0
9 Transport	+	+	+	+	0	0
10 Amenity	0	++	0	++	0	0
11 Water	0	0	0	0	0	0
12 Biodiversity	0	0	0	0	0	0
13 Waste	0	0	0	0	0	0
14 Air quality	+	+	+	0	0	0
15 Energy	+	+	+	0	0	0
16 Non-renewable resources	0	0	0	0	0	0

### Economy and jobs

E1 Promoting a successful and inclusive Camden economy

E2 Employment premises and sites

E3 Tourism

	Economy and jobs		
SA Objectives	E1	E2	E3
1 Housing	+	+	0
2 Healthy communities	0/+	0/+	0

3 Community facilities	0/+	0/+	+
4 Poverty	++	++	+
5 Economic growth	++	++	+/++
6 Sustainable communities	+/++	+/++	+
7 Urban design i	0	0	0/+
7 Historic environment ii	0	0	0
8 Vacant land	++	++	0
9 Transport	+	0	+
10 Amenity	0	0	+
11 Water	0	0	0
12 Biodiversity	0	0	0
13 Waste	0	0	0
14 Air quality	0	0	0
15 Energy	0	0	0
16 Non-renewable resources	+/0	+/0	0

## Transport

T1 Sustainable Transport

T2 Car free

T3 Improving strategic transport infrastructure

T4 Freight

	Transport policies			
SA Objectives	T1	T2	T3	T4
1 Housing	0	0	0	0
2 Healthy Communities	++	+	+	0
3 Community facilities	0	0	0	0
4 Poverty	+	+	+	0
5 Economic growth	0/+	0/+	+	0
6 Sustainable communities	+	+	+	0
7 Urban design i	+	+	+	0
7 Historic environment ii	0	+	0	0
8 Vacant land	+	++	+	0
9 Transport	++	++	++	++
10 Amenity	0/+	0/+	0/-	-
11 Water	0	+	0	0
12 Biodiversity	0/+	0/+	0	0/-
13 Waste	0	0	0	0
14 Air quality	++	++	+	+
15 Energy	+	+	+	+
16 Non-renewable resources	+	+	+	+

## Sustainability

CC1 Climate change mitigation  
 CC2 Adapting to climate change  
 CC3 Water and flooding  
 CC4 Air quality  
 CC5 Waste

	Sustainability/environment policies				
SA Objectives	CC1 Mitigation	CC2 Adaptation	CC3 Water	CC4 Air quality	CC5 Waste
1 Housing	+	+	0	0	0
2 Healthy communities	0	+	0	0	0
3 Community facilities	0	0	0	0	0
4 Poverty	0	0	0	0	0
5 Economic growth	+	0	0	0	0
6 Sustainable communities	0	0	0	0	0
7 Urban design i	-/+++	-/+++	0	0	0
7 Historic environment ii	-	-	0	0	0
8 Vacant land	++	0	0	0	0
9 Transport	+	+	0	0	0
10 Amenity	0	0	0	0	0
11 Water	0	+	++	0	0

12 Biodiversity	0	+ / ++	+	0	0
13 Waste	0	++	0	0	++
14 Air quality	- / +	+	0	+	0
15 Energy	++	++	0	0	0
16 Non-renewable resources	++	++	0	0	++

## Amenity

A1 Managing development impacts

A4 Noise and vibration

	Amenity policies	
SA Objectives	A1	A4
1 Housing	+	+
2 Healthy communities	+	0
3 Community facilities	0	0
4 Poverty	0	0
5 Economic growth	0	0
6 Sustainable communities	0	0
7 Urban design i	+	0
7 Historic environment ii	0	0

8 Vacant land	0	0
9 Transport	+	0
10 Amenity	++	++
11 Water	+	0
12 Biodiversity	+	+/?
13 Waste	+	0
14 Air quality	+	0
15 Energy	+	0
16 Non-renewable resources	0	0

### Open space and biodiversity

A2 Provision, Protection and Enhancement of our Open spaces

A3 Biodiversity and trees

	Open space and biodiversity policies	
SA Objectives	A2	A3
1 Housing	0	0
2 Healthy communities	++	0/+
3 Community facilities	++	+

4 Poverty	+	+
5 Economic growth	0	0
6 Sustainable communities	0	0
7 Urban design i	+	0
7 Historic environment ii	+	0
8 Vacant land	0	0
9 Transport	0/+	0
10 Amenity	0/+	0
11 Water	+	+
12 Biodiversity	++	++
13 Waste	0	0
14 Air quality	+	+
15 Energy	0/+	0/+
16 Non-renewable resources	0	0



## Appendix E

### Health Impact Assessment

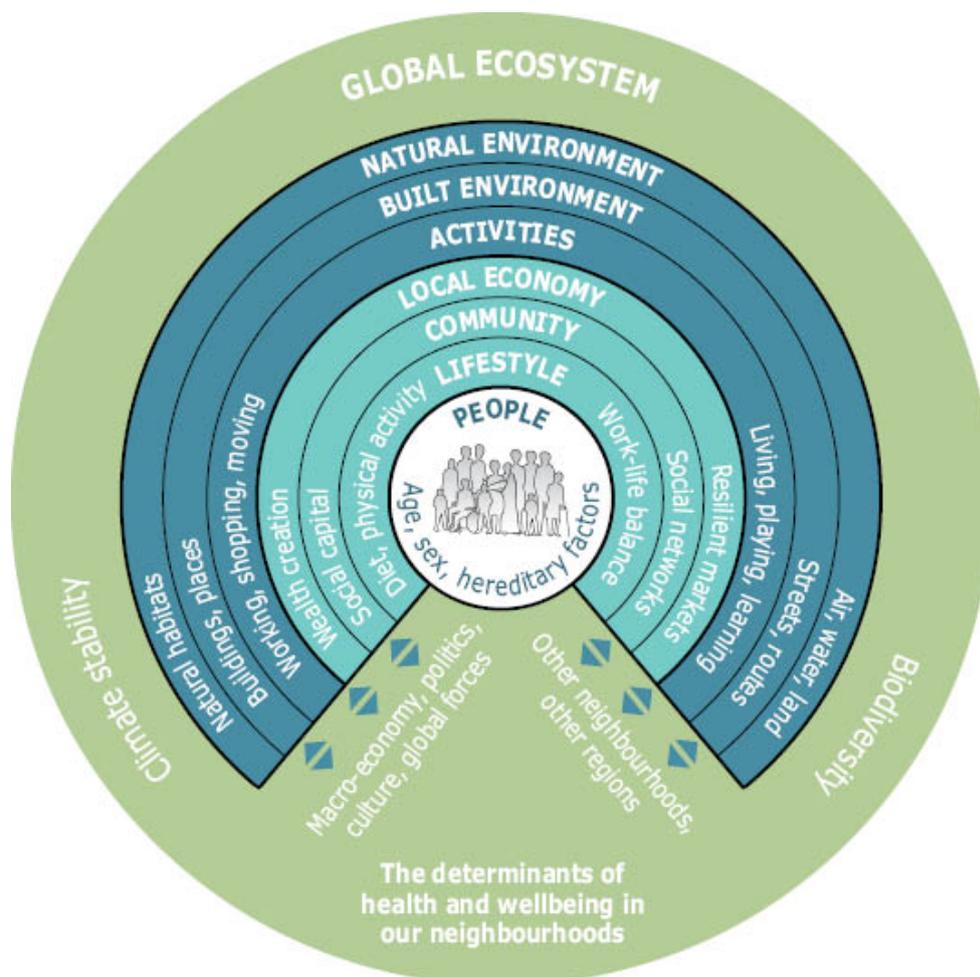
## Health Impact Assessment

### Introduction

Following initial SA scoping work and early drafting of the Local Plan it was clear that an integrated appraisal would serve to strengthen and focus the appraisal process. As such the appraisal has incorporated a Health Impact Assessment (HIA). The Equalities Impact Assessment and Habitats Regulations Assessment screening are separate documents published alongside this appraisal.

A HIA predicts the health consequences of implementing a plan or development. It is a useful tool to identify ways which the Local Plan can enhance positive health impacts and minimise or avoid negative consequences.

The determinants of health are the focus for HIA, these are: social, economic; environmental; and cultural factors that indirectly influence health and wellbeing. Planning can play a pivotal role in influencing all of these key health determinants, especially towards improving long term outcomes and addressing health inequalities. The 'Determinants of Health' are explained further in the diagram below (The Health Map, Barton and Grant, 2006)



Early scoping work identified that the SA of the LDF did not contain specific indicators for health. Therefore, we have attempted to address this by developing baseline indicators with Camden and Islington Public Health Department which have served to inform our SA objectives.

The baseline information was used to identify key sustainability issues for Camden and the majority of these issues related to health and wellbeing. For further information please see our Scoping Report.

The combination of baseline information, review of relevant plans and programmes, and sustainability issues, contributed to the development of sustainability appraisal objectives and indicators which are used to assess the sustainability of our plan proposals. The majority of sustainability objectives are related to health and wellbeing. These are:

- To promote the provision of a range of high quality and affordable housing to meet local needs;
- To promote a healthy and safe community;
- To ensure access to local shopping, community, leisure facilities and open space;
- To tackle poverty and social exclusion and promote equal opportunities;
- To encourage and accommodate sustainable economic growth and employment opportunity;
- To maximise the benefits of regeneration and development to promote sustainable communities;
- To promote high quality and sustainable urban design which conserves and enhances the historic environment;
- To reduce reliance on private transport modes and enhance permeability for non-motorised travellers;
- To improve amenity by minimising the impacts associated with development;
- To protect and manage water resources and reduce surface water flood risk;
- To improve air quality;
- To provide for the efficient use of energy;
- To minimise the use of non-renewable resources.

As noted above, matters of health and wellbeing will be a key consideration in this SA and the Local Plan and should run through this document. There are instances in the SA where there will be a greater focus on health and wellbeing and these have been noted below.

The aim of this section is to provide a concise summary of HIA findings presented in the SA appraisal.

#### Summary of HIA findings in relation to the draft Local Plan

- Policy G1 can help encourage healthier, safer communities with better access to community facilities (SA objective 2, 3), through promotion of key priorities and encouragement of comprehensively planned developments, such as the multi-site approach and for the Kentish Town Regis Road site.
- Policies H2 and H3 have minor positive effects relating to SA objective 2 (to promote a healthy and safe community). Policy H2 potentially adds to community safety by ensuring that active street frontages and natural surveillance are considered as an aspect of mixed-

use schemes. Policy H3 potentially promotes healthy communities by allowing for some loss of residential floorspace where this is needed to allow expansion of healthcare premises to meet local needs. For the same reason, Policy H3 potentially has a minor positive effect on SA objective 3 (ensure access to local shopping, community and leisure facilities).

- Policy H11 provides for traveller community to benefit from well-located and designed sites that will help them to engage positively with the wider population, which would have a major positive effect on SA objective 4 (tackle poverty and social exclusion and promote equal opportunities). Providing more pitches will help to tackle inequality and create sustainable and resilient neighbourhoods by relieving overcrowding for Camden's travellers, improving the community's health and wellbeing and better enabling children and young people to take advantage of education and training opportunities. Providing more pitches will also help us ensure the right housing for Camden's diverse communities in line with recommendations of the Equality Taskforce.
- Policy H8 allows for the provision of housing for vulnerable, homeless and elderly people in areas which are in a safe environment, close to healthcare and other community facilities, shops and services and the social networks appropriate to the needs of the intended occupiers. This will have positive effects in relation to SA objective 2 (to promote a healthy and safe community).
- Policies C1 and C2 will have major positive effects on promoting a healthy and safe community and access to community and leisure facilities. C1 requires development to positively contribute to creating high quality places that supports healthy communities, supporting the issues of tackling health inequality and promoting health and wellbeing throughout the plan document. The benefits of policy C1 could be further improved by highlighting areas of need for healthcare facilities. Policy C2 seeks to ensure that health and other community facilities are retained where it meets a specific need unless an appropriate replacement facility is provided, or that evidence demonstrates the facility is no longer required. To help address increased demand for facilities, policy C2 requires developments that result in any additional need to contribute towards supporting existing or new facilities.
- The quality of homes in the borough is likely to be better where developers are required to consider the wider determinants of health and wellbeing and to demonstrate this through the submission of a Health Impact Assessment (HIA), as required in policy C1. The determinants of health and wellbeing include social, environmental, economic, and cultural factors which when considered in the early stages of a planning application can lead to a number of minor and major positive effects. A HIA should ensure that developments reduce or seek to prevent social exclusion and that facilities, access to healthy food, employment and play areas are within easy distance. There would be minor positive effects on design and biodiversity, where the public realm, permeability and enhancing an area's identity are also considerations in a HIA.
- The element in policies E1 and E2 with regard to intensification means that areas with vacant buildings, or those buildings that are not used to full potential, could be redeveloped and possibly their uses intensified. This will likely bring more people to the area – through additional jobs and in the right circumstances additional uses, which in turn would increase natural surveillance, contributing to a healthy and safe community.

- Both policies CC1 and CC2 will provide the opportunity for people to live in a better home. Both policies will ensure that new and converted dwellings provide comfort and are built to a standard (higher than building regulations) which retains heat better in the winter and is cool in the summer. While very minor, requirements for BREEAM and CfSH provide credits for bike storage and it is more likely that people will opt for a healthier mode of transport if they have somewhere suitable to store a bike.
- With respect to the objectives for promoting healthy communities policy D1 design will have minor positive effects by ensuring development reduces crime by being built to Secured by Design principles, including passive surveillance. Policy D1 design also ensures that design encourages healthy lifestyles, and by creating an environment which encourages sustainable forms of transport such as walking and cycling through legibility, permeability, active frontages, and an attractive public realm. Policy D3 shopfronts will contribute to these objectives by creating or preserving active frontages by stopping solid roller shutters which will help prevent crime and fear of crime.
- Policy A1 requires development to consider a number of factors connected to the amenities of existing occupiers and neighbours and the amenities of future occupiers. These factors affect the living conditions of residents in the borough, which has strong connections to health and general wellbeing.
- The quality of homes in the borough is likely to be better when aspects such as noise and vibration, daylight/sunlight, outlook, and privacy are considered in the assessment of planning applications. This also has minor positive impacts on health and wellbeing of those living in accommodation where these requirements are applied.
- Requirements for Transport Assessment and Travel Plans are likely to have minor to major positive effects, through encouraging sustainable means of travel such as walking and cycling, on reductions of carbon dioxide emissions and healthy living choices which both in turn help to reduce prevalence of cardiovascular and respiratory disease which is a priority area in the Council's Joint Strategic Needs Assessment. Travel Plans will also have minor to major positive effects on improving access to sustainable modes of transport. The degree of positive effects will be dependent on the scale, location and type of development and such effects are not considered permanent as other external factors may influence the degree of effects such as new building development, new bus routes/stations or other transport improvements.
- Policy A1 will require investigative works and possibly remedial action on sites known to be contaminated such measures will ensure that residents, workers, visitors are not exposed to potential health risks. It will also ensure that remedial measures will not cause harm to water quality. These effects will be constrained to specific sites in the borough and once development occurs the effects would be permanent. We could increase the positive effects here by stating that the Council wants to ensure that development makes efficient use of existing vacant or underused buildings.
- Policy A2 – can have a major positive effect through the provision of publically accessible open space which can be particularly important for disadvantaged groups, who may not have access to private amenity space and can help tackle social exclusion (SA objective 4).

The potential for open spaces, nature reserves to have major social effects through encouraging the formation of 'friend' of spaces, educational learning opportunities through the spaces and encouraging interactions and promoting resilience of communities (SA objective 4) which have strong links to promote healthy and safe communities as well as being providing opportunities for physical activity and general wellbeing (SA objective 2).