

FITZROVIA AREA ACTION PLAN

SUSTAINABILITY APPRAISAL OF MAIN MODIFICATIONS PROPOSED

SEPTEMBER 2013



Contents

	Page
Introduction	3
Approach	3
SA Objectives	4
Conclusion	7

Tables and Appendices

Table 1: SA Objectives	4
Table 2: Key to symbols in the SA Assessment Matrix	7
Appendix 1: Summary of SA Implications	8
Appendix 2: SA Assessment Matrix for Main Modifications	18

INTRODUCTION

Sustainability Appraisal (SA) is a process of assessment to ensure that sustainability is at the heart of decisions on the preparation of new planning policies. In relation to the Fitzrovia Area Action Plan (AAP), Sustainability Appraisal helps ensure that the land use principles and allocation of opportunity sites for development achieves an appropriate balance of positive social, environmental and economic outcomes for Camden and that any adverse effects are minimised or effectively mitigated.

A full SA was carried out for the Fitzrovia AAP (FAAP3 of the Examination Document Library) in parallel with the policy development process. It has been an iterative process that intends to provide constructive assessment of policy options to ensure that negative impacts on sustainability are minimised.

This **Sustainability Appraisal of Main Modifications Proposed** has been produced to assist the ongoing public examination of the AAP following the close of the public hearing sessions, which took place in July 2013. The Council has produced a proposed schedule of main modifications in the light of public representations made about the Plan up to 31 January 2013 and discussions at the public hearings. The schedule of main modifications proposed has been published alongside this Sustainability Appraisal. The main modifications are changes that, when taken together, materially affect the policies set out in the Plan, and are likely to be necessary to ensure that the all elements if the AAP are fully sound and legally compliant.

This Appraisal considers any significant changes that have not been appraised previously and should be read alongside the previous Sustainability Appraisal (FAAP3). Both Appraisals have been prepared in accordance with government guidance and fulfil the requirements of the Planning and Compulsory Purchase Act 2004 and the European Strategic Environmental Assessment Directive (2001/42/EC).

APPROACH

(A) Each main modification has been assessed to determine first whether or not the proposed modification is likely to have any significant implications and these are summarised in **Appendix 1**.

(B) The main modifications have been assessed in **Appendix 2** to identify any new or altered sustainability impacts against the SA objectives listed in Table 1 below. Each objective is supported by a number of criteria to assist assessment as to the potential impacts.

In order to ensure consistency, the additional appraisal work has been carried out using the same objectives as those used at previous stages of the SA process and test the proposed main modifications in the same manner. A set of 15 key SA objectives were developed through the Scoping Report, which were based on the SA objectives that were developed to assess the adopted Camden Core Strategy 2010-2025.

Table 1: SA Objectives

No.	Objective	Criteria
1	To promote the provision of a range of high quality and affordable housing to meet local needs.	<ul style="list-style-type: none"> a) Will the AAP increase the supply of housing? b) Will the AAP protect and promote affordable housing development? c) Will the AAP provide housing for people, particularly families, on moderate incomes? d) Will the AAP encourage development at an appropriate density, standard, size and mix? e) Will the AAP provide a wider range of tenure and provide everybody with the opportunity to live in a decent home?
2	To promote a healthy and safe community.	<ul style="list-style-type: none"> a) Will the AAP reduce the capacity of existing healthcare facilities in the area? b) Will the AAP promote healthy living through e.g. provision of walking, cycling and recreation facilities? c) Will the AAP help reduce levels of crime, anti-social behaviour and fear of crime?
3	To ensure access to local shopping, community, leisure facilities and enhancement of open space.	<ul style="list-style-type: none"> a) Will the AAP encourage mixed-use development? b) Will the AAP encourage the retention and development of key services? c) Will the AAP encourage the location of services in proximity to public transport? d) Will the AAP help to increase / improve open space?
4	To tackle social exclusion.	<ul style="list-style-type: none"> a) Will the AAP encourage development that facilitates social cohesion? b) Will the AAP provide for equality of access for all to facilities, buildings and services?
5	To encourage and accommodate sustainable economic growth and employment opportunity.	<ul style="list-style-type: none"> a) Will the AAP encourage the retention and growth of existing, locally based industries? b) Will the AAP accommodate new and expanding businesses? c) Will the AAP encourage new investment in the local economy and promote development opportunities for employment?
6	To maximise the benefits of regeneration and development to promote sustainable communities.	<ul style="list-style-type: none"> a) Will the AAP encourage sustainable inward investment that will promote social wellbeing and benefit the economy? b) Will the AAP promote access to employment opportunities for local people? c) Will the AAP provide for adequate education facilities, including lifelong learning?

No.	Objective	Criteria
7	To promote high quality and sustainable urban design which protects and enhances the historic environment.	<ul style="list-style-type: none"> a) Will the AAP provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Will the AAP ensure enhancement of the public realm and local distinctiveness? c) Will the AAP ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value? d) Will the AAP encourage the use of sustainable design and construction?
8	To ensure new development makes efficient use of land, buildings and infrastructure.	<ul style="list-style-type: none"> a) Will the AAP encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair? b) Will the AAP ensure efficient use of land through maximising densities where appropriate?
9	To reduce reliance on private transport modes and enhance permeable access within the local area for non-motorised travellers.	<ul style="list-style-type: none"> a) Will the AAP encourage development at locations that enable walking, cycling and/or the use of public transport? b) Will the AAP encourage the provision of infrastructure for walking, cycling and/or the provision of public transport? c) Will the AAP encourage access for all to public transport? d) Will the AAP encourage an increase in car free and car capped housing? e) Will the AAP enhance permeability of the area for access by non motorised forms of transport?
10	To improve amenity by minimising the impacts associated with noise.	<ul style="list-style-type: none"> a) Will the AAP ensure that noise from existing and new developments and operations will not affect new or existing noise sensitive development or land uses? b) Will the AAP ensure new noise sensitive uses are not located near existing established noise generating uses?
11	To protect and manage water resources and reduce flood risk.	<ul style="list-style-type: none"> a) Will the AAP promote the sustainable use of water resources? b) Will the AAP encourage development that incorporates sustainable drainage? c) Does the AAP take into account potential flood risk?
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<ul style="list-style-type: none"> a) Will the AAP protect and enhance natural habitats in the borough, particularly those of priority species (includes terrestrial and avian)? b) Will the AAP provide for the protection of biodiversity and open space in the borough? c) Will the AAP encourage the creation of new habitats, including through the provision of additional open space and green roofs? d) Will the AAP protect and provide for the planting of more trees in the borough?

No.	Objective	Criteria
13	To improve air quality.	a) Will the AAP reduce CO2 and other greenhouse gas concentrations in the atmosphere? b) Will the AAP reduce the discharge of particulate matter to the atmosphere? c) Will the AAP contribute to an improvement of air quality?
14	To provide for the efficient use of energy.	a) Will the AAP encourage the generation and use of renewable energy? b) Will the AAP encourage energy efficiency?
15	To minimise the use of fossil fuels, aggregates and non-renewable resources.	a) Will the AAP encourage more efficient supply and use of natural resources? b) Will the AAP encourage sustainable design and construction? c) Will the AAP encourage the use of alternative modes of transport to the private car?

In order to attribute likely impacts against these objectives an assessment matrix was developed that included the objectives and columns for carrying out the appraisal (see Appendix 2). This matrix is consistent with the approach used in the SA of the Camden Core Strategy 2010-2025 and Camden Development Policies adopted Nov 2010, and the SA of the Proposed Submission version of the AAP. Within the assessment matrix, the effects on the issues are depicted by symbols (see Table 2 on the next page). A summary of sustainability implications is provided to explain the reasoning behind this appraisal and its outcomes (see Appendix 1).

Table 2: Key to symbols in the SA Assessment Matrix

Significance of effect		Description of effect
✓✓	Major positive	Likely to benefit the whole of Fitzrovia and beyond or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major
✓	Positive	The extent of predicted beneficial effects is likely to be limited to small areas within Fitzrovia or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
-	Neutral	Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.
✕	Minor negative	Minor negative effects are likely to be limited to small areas within Fitzrovia, or limited to small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is effect is likely to be minor as is the magnitude of the predicted effect.
✕✕	Major negative	Likely to affect the whole, or large areas of Fitzrovia or wider area. Also applies to effects on nationally or internationally important assets. The effects are likely to be direct, irreversible and permanent. The magnitude of the predicted effects will also be major.
?	Unknown	This significance criterion is applied to effects where there is insufficient information to make a robust assessment.
✓✕	Mixed impact	This is used to highlight where there may be beneficial and negative impacts.
? ✓ / ? ✕	Mixed impact	This is used to highlight where there may be uncertain impacts alongside clearly defined beneficial or negative impacts.

CONCLUSION

As highlighted below the proposed Main Modifications do not significantly affect the overall findings of the Sustainability Appraisal of the Proposed Submission AAP in terms of delivering positive sustainability outcomes when set against the relevant criteria. If anything they will assist in providing greater clarity to the policy guidance to balance growth in Fitzrovia with the needs of the local community and existing institutions. In general the Main Modifications will have positive sustainability impacts, by introducing references to ways in which the Plan can contribute to the sustainability objectives. In the very few instances where the proposed modifications will have negative impacts, these are either compensated for by significant positive impacts against other sustainability criteria or mitigation measures have been set out within the description of the implications.

APPENDIX 1: SUMMARY OF SUSTAINABILITY IMPLICATIONS

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
Part 1: Purpose and scope			
1	-	Amended map to show the northern boundary of the Plan area running along the back edge of the pavement on the south side of Euston Road.	Neutral. The modifications will have no significant effect on the sustainability impact of the Plan. The area removed from the Plan boundary will be incorporated within the Euston Area Plan, which will set out measures for enhancement of the public realm in this location and will be prepared with a detailed sustainability appraisal.
2	6	Amended map to show the northern boundary of the Plan area running along the back edge of the pavement on the south side of Euston Road.	See Mod. 1
3	6	Amended text to acknowledge the future needs of residential communities.	Positive. This text will acknowledge the future needs of the residential community throughout Fitzrovia and will support the provision of facilities, amenity and quality of life.
4	9	Amended text to restore the model NPPF policy wording and use more general wording in the second paragraph.	Positive. This text is intended to make the plan more proactive and positive with regard to development in Fitzrovia.
5	12	Amended text to clarify the role of this section, acknowledgement of additional relevant policies and a change in the potential housing capacity of the opportunity sites.	Positive. The amended text is intended to provide further clarity and acknowledges that a larger supply of housing may be possible in Fitzrovia, than was identified in the Submission version Plan.
6	13	Mapping changes to show the amended northern boundary of the Plan area, the amended preferred land uses for Sites 2 and 3, and the corrected boundary of private open space at Fitzroy Square.	<p>Positive. The amended preferred land uses promote the provision of housing on these two opportunity sites.</p> <p>The corrected boundary of Fitzroy Square will have a neutral impact on sustainability in Fitzrovia.</p> <p>The amended preferred land uses are appraised under Mods 48 and 49.</p> <p>The amended northern boundary is appraised under Mod. 1.</p>

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
Part 2: Character and challenges			
7	20	Amended map to identify a property which makes a positive contribution to the character of the conservation area.	Positive. The modification will identify a property which makes a positive contribution to the conservation area, and therefore ensure the protection of the historic environment.
8	21	Amended text to acknowledge the presence of students and institutions in Fitzrovia and their relationship with other uses and occupiers in the area.	Neutral. The modifications will have no significant effect on the sustainability impact of the Plan.
9	21	Amended map to correct the Tottenham Court Road Growth Area boundary.	Neutral. The modifications will have no significant effect on the sustainability impact of the Plan.
10	24	Amended map to reflect corrections relating to 'Two Way Working' and northern boundary of the Plan area.	Neutral. The modifications will have no significant effect on the sustainability impact of the Plan. The amended northern boundary is appraised under Mod. 1.
Part 3: Vision and objectives			
11	26-27	Amended text to acknowledge the future needs of residential communities.	Positive. This text will acknowledge the future needs of the residential community throughout Fitzrovia and will support the provision of facilities, amenity and quality of life.
Part 4: Land use principles			
12	30	Amended text relating to the balance between uses in Fitzrovia.	Neutral. The modifications do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
13	31	Amended text relating to housing and the contribution that the opportunity sites can make to housing and medical / healthcare delivery. Also addition of text relating to NPPF and the conversion of commercial buildings to housing.	Positive. The text will encourage the delivery of housing in Fitzrovia, to meet the needs of various occupiers, and will also promote the provision of healthcare facilities.
14	32-33	Amended text to include references to NPPF and mixed-use development, affordable housing and mixed and inclusive	Positive. The text will encourage the delivery of affordable housing and mixed-use development and will facilitate social cohesion.

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
		communities.	
15	34-39	Amended text regarding off-site open space provision and Camden's Community Infrastructure Levy.	Positive. The modifications will help to increase open space provision in Fitzrovia which will also encourage the creation of new habitats and biodiversity.
16	35	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	Neutral. The amended northern boundary will have a neutral impact and is appraised under Mod. 1. The corrected boundary of Fitzroy Square will have a neutral impact on sustainability in Fitzrovia, and is appraised under Mod. 2.
17	41	Amendment to clarify reference to key objective.	Neutral. The modification will have no impact on sustainability of the Plan.
18	43	Amendment to clarify reference to key objective.	Neutral. The modification will have no impact on sustainability of the Plan.
19	47-49	Amended text to refer to residential amenity and additional guidance in Camden Planning Guidance.	Neutral. The modifications do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
20	50-52	Amended text to state that institutional uses should maintain the mixed-use character of the area and support the residential community.	Positive. The amended text will encourage mixed-use development in Fitzrovia.
21	54	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	Neutral. The amended northern boundary will have a neutral impact and is appraised under Mod. 1. The corrected boundary of Fitzroy Square will have a neutral impact on sustainability in Fitzrovia, and is appraised under Mod. 2.
22	55	Amendment to clarify reference to key objective.	Neutral. The amendment will have no impact on sustainability of the Plan.
23	57	Amendment to acknowledge access issues for taxis and coaches and also text relating to the balance between uses in Fitzrovia.	Neutral. The amendments do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
24	58-60	Amended text to acknowledge noise / vibration issues and thresholds, and also an amendment to clarify reference to key objective.	Positive. The amendments will improve amenity by minimising the impacts associated with noise.
25	59	Mapping changes to show the amended northern boundary	Neutral. The amendments do not substantially change the Plan's approach and

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
		of the Plan area, the corrected boundary of private open space at Fitzroy Square, and to reflect latest information from Camden's land and property gazetteer.	therefore will have no significant effect on the sustainability impact of the Plan. The amended northern boundary is appraised under Mod. 1 and the corrected boundary of Fitzroy Square is appraised under Mod. 2.
26	61-64	Amended text to include references to surface water flood risk and the importance of sustainable urban drainage systems.	Positive. The amendments will help to reduce flood risk in Fitzrovia.
27	62	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	Neutral. The amended northern boundary will have a neutral impact and is appraised under Mod. 1. The corrected boundary of Fitzroy Square will have a neutral impact on sustainability in Fitzrovia, and is appraised under Mod. 2.
Part 5: Character areas and urban design principles			
28	68	Amended text to identify the constraints to tall buildings in the Plan area to acknowledge the local views in Fitzrovia. Also, text to refer to legibility for visitors to the area and relating to off-site open space provision.	Positive. The proposed modifications will promote high quality design which protects the built environment, and will also help to increase open space provision in Fitzrovia, which will also have a positive impact in terms of encouraging habitats and biodiversity.
29	69	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	Neutral. The amended northern boundary will have a neutral impact and is appraised under Mod. 1. The corrected boundary of Fitzroy Square will have a neutral impact on sustainability in Fitzrovia, and is appraised under Mod. 2.
30	71	Amended text to explain the character area boundaries.	Neutral. The modification will have no impact on sustainability of the Plan.
31	72	Mapping changes to character area boundaries and to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	Neutral. The amendments do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan. The amended northern boundary is appraised under Mod. 1 and the corrected boundary of Fitzroy Square is appraised under Mod. 2.
32	73-	Amended text to more accurately describe the Eisenhower	Positive. The proposed modifications provide more detail on Alfred Place which

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
	74	Centre and its contribution to the conservation area, and also text relating to the pedestrian environment in Alfred Place.	will protect the historic environment and improve the pedestrian environment.
33	77	Mapping change to add a character area principle regarding additional seating.	Positive. The proposed modification will help to improve the open space around Bedford Square, whilst acknowledging the Square's heritage assets.
34	78	Addition of character area principle regarding additional seating in Bedford Square.	Positive. This amendment is appraised under Mod. 33.
35	84-85	Delete Euston Road Character Area	Neutral. The deletion of this section will have no significant effect on the sustainability impact of the Plan. The area removed from the Plan boundary will be incorporated within the Euston Area Plan, which will set out measures for enhancement of the public realm in this location and will be prepared with a detailed sustainability appraisal.
36	87	Mapping changes to character area boundaries and re-numbered principles.	Neutral. The amendments do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
37	92	Mapping changes to character area boundaries	Neutral. The amendments do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
38	93-94	Amended text to include character area principle regarding pedestrian routes.	Positive. The proposed modifications will help to increase and improve open space and will encouraging walking through the area.
39	94	Mapping changes to character area boundaries and re-numbered principles.	Neutral. The amendments do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
40	96-97	Amended text to clarify process for removing advertising hoarding and to indicate that servicing arrangements should be maintained.	Neutral. The amendments do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
41	99	Mapping changes to character area boundaries and re-numbered principles.	Neutral. The amendments will have no significant effect on the sustainability impact of the Plan.
42	99	Amendments to acknowledge amenity issues related to medical / healthcare uses and the introduction of a requirement for improvements to the pedestrian environment around Grafton Way.	Positive. This amendment seeks to improve the pedestrian experience i.e. ease of movement. The inclusion of landscaping and tree planting, where appropriate, would create new habitats and help to improve local air quality.
43	101	Amendment to include a character area principle relating to	Positive. The amended northern boundary and Euston Road Character Area is

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
		the pedestrian area around Bedford Square, a character area principle relating to the pedestrian environment in Grafton Way, and also mapping changes to character area boundaries and re-numbered principles.	appraised under Mod. 1. The character area principle for Bedford Square is appraised under Mod 33. The character area principle for Grafton Way is appraised under Mod 42.
Part 6: Opportunity sites			
44	105	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	Neutral. The amendments will have no significant effect on the sustainability impact of the Plan. The amended northern boundary is appraised under Mod. 1. The corrected boundary of Fitzroy Square will have a neutral impact on sustainability in Fitzrovia.
45	107	Amendment to make stronger reference to the setting of the listed buildings.	Positive. The amendment will have a positive impact to the townscape through ensuring the protection and enhancement of the built environment.
46	107	Amendment to the diagram to refer to the existing buildings on-site.	Positive. The amendment will identify existing buildings that could be retained/reused.
47	108-109	Amendment to site boundary and text to clarify the approach to providing public open space, in association with adjacent sites.	Positive. The amended and additional text seeks to increase the provision of public open space which would have a positive impact on the health, environment, biodiversity and air quality of the locality.
48	110 - 111	Amendment to the land use allocation of the site from mixed-use to housing. Also amendments to acknowledge the setting of the listed building and to clarify the approach to providing public open space as part of any development.	Positive - with regards to increasing the supply of housing and affordable housing in addition to small mention of small scale commercial uses, encouraging local economic growth. There is a greater emphasis on open space provision in the locality, contributing to objectives of biodiversity and air quality. Negative. Loss of healthcare facility – negative effects are mitigated against by other sites designated for healthcare (sites 5, 6, 7, 8).
49	111-112	Amendment to the land use allocation of the site to strengthen opportunity for housing to be provided, and to allow for commercial uses. Also amendments to clarify the approach to providing public open space as part of any	Positive. The amendments and text encourages the provision of housing and affordable housing and the scale of public open space relative to the increases of use in the local area.

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
		development of this site.	The added text suggests that commercial uses may be suitable, encouraging the start-up of new businesses in the local area.
50	114 - 115	Amendment to clarify the approach to providing public open space as part of any development of this site.	<p>Positive. The amended text intends to increase the supply of housing if additional floorspace is proposed.</p> <p>The intention to provide public open space would help to improve access to open space in the local area and help to create new areas of habitat.</p>
51	118 - 119	Amendment to clarify the approach to providing public open space as part of any development of this site.	<p>Positive. The amended text intends to increase the supply of housing if additional floorspace is proposed.</p> <p>There is a greater emphasis on open space provision in the locality, contributing to objectives of biodiversity and air quality.</p>
52	120- 121	Amendment to clarify the approach to providing public open space within the vicinity of this site.	<p>Positive. The amended text intends to increase the supply of housing if additional floorspace is proposed.</p> <p>The intention to provide public open space has not changed.</p>
53	125 - 126	Amendments to clarify the approach to providing public open space within the vicinity of this site, and to acknowledge the amenity of nearby residents. Amendments also relating to design considerations.	<p>Positive. The amended text intends to increase the supply of housing if additional floorspace is proposed.</p> <p>The added text intends to ensure the amenities of neighbouring occupiers are not unduly affected and that the standard of development is of high quality design which protects and enhances the historic environment.</p> <p>There is a greater emphasis on open space provision in the locality, contributing to objectives of biodiversity and air quality.</p>
54	129 - 130	Amendments to clarify the approach to providing public open space within the vicinity of this site, and to make stronger reference to design and heritage considerations.	<p>Positive. The amendment seeks to protect important local views and nearby conservation areas of Westminster.</p> <p>The approach to housing has not changed. Specifics have been replaced with Camden's policy criteria for mixed use development.</p> <p>There is a greater emphasis on open space provision in the locality,</p>

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
			contributing to objectives of biodiversity and air quality.
55	132 - 133	Amendments to refer to the Council's mixed use policy and clarify the approach to public open space provision.	<p>Positive. The amended text intends to increase the supply of housing if additional floorspace is proposed.</p> <p>The intention to provide public open space has not changed nor has the approach to protecting conservation areas.</p>
56	134 – 135	Amendments regarding public open space provision on site.	<p>Positive. The additional text clearly specifies the intention to provide public open space at this site which will create new habitats in the local area.</p> <p>The approach to housing has not changed. Specifics have been replaced with Camden's policy criteria for mixed use development.</p>
57	136 - 137	Amendments regarding public open space provision on site.	<p>Positive. The additional text clearly specifies the intention to provide public open space in association with another site which will create new habitats in the local area.</p> <p>The approach to housing has not changed. Specifics have been replaced with Camden's policy criteria for mixed use development.</p>
58	138 - 139	Amendments to clarify the approach to providing public open space within the vicinity of this site, and for the site to make a maximum reasonable contribution towards business space and housing.	<p>Positive. The amendment encourages maximum contributions towards additional business and housing floorspace, increasing local access to facilities and encouraging growth.</p> <p>The approach to housing has not changed. Specifics have been replaced with Camden's policy criteria for mixed use development.</p> <p>There is a greater emphasis on open space provision in the locality, contributing to objectives of biodiversity and air quality.</p>
59	140 - 141	Amendments to site boundary and to clarify the approach to providing public open space within the vicinity of this site, and to acknowledge heritage assets in the area.	<p>Positive. The added text encourages the provision of public open space which will help to promote healthy living and create or improve upon natural habitats.</p> <p>The intention of retaining particular buildings of conservation value has been made clear.</p>

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
Part 7: Delivery and monitoring			
60	148	Amendment to clarify the figure for the scale of potential development the site.	Neutral. The amendment does not change the intention of the policy.
61	148	Reword 'Details' for Middlesex Hospital Annex to state that housing is expected to be the predominant use on this site.	Neutral. The amendment does not change the intention of the policy.
62	148	Reword 'Details' for Arthur Stanley House to clarify potential land uses.	Neutral. The amendment does not change the intention of the policy.
63	148 - 149	Amend 'Notes' for the Rosenheim Building and Odeon Site to update timescales.	Neutral. The amendment does not change the intention of the policy.
64	149	Reword 'Timescale' for Royal Ear Hospital and Medical Students' Union.	Neutral. The amendment does not change the intention of the policy.
65	150	Reword 'Notes' for Network Building regarding potential scale of development.	Neutral. The amendment does not change the intention of the policy.
66	151	Reword 'Notes' for Astor College regarding potential scale of development.	Neutral. The amendment does not change the intention of the policy.
67	151	Reword 'Details' for potential open space within Alfred Place.	Neutral. The intention to create an open public space has not altered significantly.
68	156	Reword 'Notes' for 6-17 Tottenham Court Road regarding potential scale of development.	Neutral. The amendment does not change the intention of the policy.
69	157	Reword 'Notes' for the Network Building regarding potential scale of development.	Neutral. The amendment does not change the intention of the policy.
70	158	Amend the 'Notes' for the Odeon Site to update timescales.	Neutral. The amendment does not change the intention of the policy.
71	158	Delete 6-17 Tottenham Court Road from 'Offices' section of the Delivery Plan.	Minor negative. The deletion of offices prevents the establishment of new and expanding offices. Offices at this site were removed from the site allocations document as we considered that offices could not be bought forward nonetheless, housing is still expected at this site.

Mod Ref.	Page no.	Summary of Main Modification	Sustainability Appraisal implications
72	158	Reword 'Notes' for the Network Building to clarify the potential scale of development.	Neutral. The amendment does not change the intention of the policy.
73	159	Delete Middlesex Hospital Annex from medical / healthcare section of the Delivery Plan.	Negative. Loss of healthcare facility – negative effects are mitigated against by other sites designated for healthcare (sites 5, 6, 7, 8).
74	159	Reword 'Details' for Arthur Stanley House in relation to existing medical / healthcare uses.	Neutral. The amendment does not change the intention of the policy.
75	159	Reword 'Notes' for Tottenham Mews Day Hospital regarding potential scale of development.	Neutral. The amendment does not change the intention of the policy.
76	159	Amend the 'Notes' for the Rosenheim Building to clarify the nature of the potential medical / healthcare uses on this site.	Neutral. The amendment does not change the intention of the policy.
77	160	On page 160 amend the 'Notes' for the Odeon Site to clarify the nature of the potential medical / healthcare uses on this site.	Neutral. The amendment does not change the intention of the policy.
78	160	Reword 'Timescale' for Royal Ear Hospital and Medical Students' Union, and clarify figure regarding potential scale of development.	Neutral. The amendment does not change the intention of the policy.

APPENDIX 2: SA ASSESMENT MATRIX FOR MAIN MODIFICATIONS TO FITZROVIA AREA ACTION PLAN

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
Part 1: Purpose and scope																	
1	-	Amended map to show the northern boundary of the Plan area running along the back edge of the pavement on the south side of Euston Road.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	6	Amended map to show the northern boundary of the Plan area running along the back edge of the pavement on the south side of Euston Road.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	6	Amended text to acknowledge the future needs of residential communities.	-	✓✓	-	✓✓	-	✓✓	-	-	-	-	-	-	-	-	-
4	9	Amended text to restore the model NPPF policy wording and use more general wording in the second paragraph.	-	-	-	-	-	-	-	✓✓	-	-	-	-	-	-	-
5	12	Amended text to clarify the role of this section, acknowledgement of additional relevant policies and a change in the potential housing capacity of the opportunity sites.	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	13	Mapping changes to show the amended	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
		northern boundary of the Plan area, the amended preferred land uses for Sites 2 and 3, and the corrected boundary of private open space at Fitzroy Square.															
Part 2: Character and challenges																	
7	20	Amended map to identify a property which makes a positive contribution to the character of the conservation area.	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-
8	21	Amended text to acknowledge the presence of students and institutions in Fitzrovia and their relationship with other uses and occupiers in the area.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	21	Amended map to correct the Tottenham Court Road Growth Area boundary.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	24	Amended map to reflect corrections relating to 'Two Way Working' and northern boundary of the Plan area.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
Part 3: Vision and objectives																	
11	26-27	Amended text to acknowledge the future needs of residential communities	-	✓✓	-	✓✓	-	✓✓	-	-	-	-	-	-	-	-	-
Part 4: Land use principles																	
12	30	Amended text relating to the balance between uses in Fitzrovia.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	31	Amended text relating to housing and the contribution that the opportunity sites can make to housing and medical / healthcare delivery. Also addition of text relating to NPPF and the conversion of commercial buildings to housing.	✓✓	✓✓	-	✓✓	-	✓✓	-	✓✓	-	-	-	-	-	-	-
14	32-33	Amended text to include references to NPPF and mixed-use development, affordable housing and mixed and inclusive communities.	✓✓	-	✓✓	✓✓	-	-	-	-	-	-	-	-	-	-	-
15	34-39	Amended text regarding off-site open space provision and Camden's Community Infrastructure Levy.	-	-	✓✓	-	-	-	-	-	-	-	-	✓✓	-	-	-
16	35	Mapping changes to show the amended	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
		northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.															
17	41	Amendment to clarify reference to key objective.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	43	Amendment to clarify reference to key objective.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	47-49	Amended text to refer to residential amenity and additional guidance in Camden Planning Guidance.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	50-52	Amended text to state that institutional uses should maintain the mixed-use character of the area and support the residential community.	-	-	✓✓	-	-	-	-	-	-	-	-	-	-	-	-
21	54	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	55	Amendment to clarify reference to key objective.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	57	Amendment to acknowledge access issues for taxis and coaches and also text relating to the balance between uses in Fitzrovia.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
24	58-60	Amended text to acknowledge noise / vibration issues and thresholds, and also an amendment to clarify reference to key objective.	-	-	-	-	-	-	-	-	-	✓✓	-	-	-	-	-
25	59	Mapping changes to show the amended northern boundary of the Plan area, the corrected boundary of private open space at Fitzroy Square, and to reflect latest information from Camden's land and property gazetteer.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	61-64	Amended text to include references to surface water flood risk and the importance of sustainable urban drainage systems.	-	-	-	-	-	-	-	-	-	-	✓✓	-	-	-	-
27	62	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Part 5: Character areas and urban design principles																	
28	68	Amended text to identify the constraints to tall buildings in the Plan area to acknowledge the local views in Fitzrovia.	-	-	✓✓	-	-	-	✓✓	-	-	-	-	✓✓	-	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
		Also, text to refer to legibility for visitors to the area and relating to off-site open space provision.															
29	69	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	71	Amended text to explain the character area boundaries.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	72	Mapping changes to character area boundaries and to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	73-74	Amended text to more accurately describe the Eisenhower Centre and its contribution to the conservation area, and also text relating to the pedestrian environment in Alfred Place.	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-
33	77	Mapping change to add a character area principle regarding additional seating in Bedford	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
		Square.															
34	78	Addition of character area principle regarding additional seating in Bedford Square.	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-
35	84-85	Delete Euston Road Character Area	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36	87	Mapping changes to character area boundaries and re-numbered principles.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
37	92	Mapping changes to character area boundaries	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38	93-94	Amended text to include character area principle regarding pedestrian routes.	-	-	✓	-	-	-	-	-	✓	-	-	-	-	-	-
39	94	Mapping changes to character area boundaries and re-numbered principles	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40	96-97	Amended text to clarify process for removing advertising hoarding and to indicate that servicing arrangements should be maintained.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
41	99	Mapping changes to character area boundaries and re-numbered principles.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42	99	Amendments to acknowledge amenity issues related to medical / healthcare uses and the introduction of a requirement for improvements	-	✓	-	-	-	-	✓	-	-	-	-	✓	✓	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
		to the pedestrian environment around Grafton Way.															
43	101	Amendment to include a character area principle relating to the pedestrian area around Bedford Square, and also mapping changes to character area boundaries and re-numbered principles.	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-
Part 6: Opportunity sites																	
44	105	Mapping changes to show the amended northern boundary of the Plan area and the corrected boundary of private open space at Fitzroy Square.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45	107	Amendment to make stronger reference to the setting of the listed buildings.	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-
46	107	Amendment to the diagram to refer to the existing buildings on-site.	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	-
47	108-109	Amendment to correct the site boundary and clarify the approach to providing public open space, in association with adjacent sites.	-	✓	✓	-	-	-	✓	-	-	-	-	✓	✓	-	-
48	110 -	Amendment to the land use allocation of the site	✓✓	X	✓	-	✓	-	-	-	-	-	-	✓	✓	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
	111	from mixed-use to housing. Also amendments to acknowledge the setting of the listed building and to clarify the approach to providing public open space as part of any development.															
49	112-113	Amendment to the land use allocation of the site to strengthen opportunity for housing to be provided, and to allow for commercial uses. Also amendments to clarify the approach to providing public open space as part of any development of this site.	✓✓	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-
50	114 - 115	Amendment to clarify the approach to providing public open space as part of any development of this site.	✓	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-
51	118 - 119	Amendment to clarify the approach to providing public open space as part of any development of this site.	✓	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-
52	120 - 121	Amendment to clarify the approach to providing public open space within the vicinity of this site.	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-
53	125 - 126	Amendments to clarify the approach to providing public open space within the vicinity of this site,	✓	-	-	-	-	-	✓	-	-	✓	-	✓	✓	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
		and to acknowledge the amenity of nearby residents. Amendments also relating to design considerations.															
54	129 - 130	Amendments to clarify the approach to providing public open space within the vicinity of this site, and to make stronger reference to design and heritage considerations.	-	-	-	-	-	-	✓	-	-	-	-	✓	✓	-	-
55	132 - 133	Amendments to refer to the Council's mixed use policy and clarify the approach to public open space provision.	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	134 - 135	Amendments regarding public open space provision on site.	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-
57	136 - 137	Amendments regarding public open space provision on site.	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-
58	138 - 139	Amendments to clarify the approach to providing public open space within the vicinity of this site, and for the site to make a maximum reasonable contribution towards business space and housing.	-	-	✓	-	✓	-	-	-	-	-	-	✓	✓	-	-
59	140 -	Amendments to correct the site boundary, clarify	-	-	-	-	-	-	✓	-	-	-	-	✓	✓	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
	141	the approach to providing public open space within the vicinity of this site, and to acknowledge heritage assets in the area.															
Part 7: Delivery and monitoring																	
60	148	Amendment to clarify the figure for the scale of potential development the site.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
61	148	Reword 'Details' for Middlesex Hospital Annex to state that housing is expected to be the predominant use on this site.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
62	148	Reword 'Details' for Arthur Stanley House to clarify potential land uses.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
63	148 - 149	Amend 'Notes' for the Rosenheim Building and Odeon Site to update timescales.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
64	149	Reword 'Timescale' for Royal Ear Hospital and Medical Students' Union.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
65	150	Reword 'Notes' for Network Building regarding potential scale of development.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
66	151	Reword 'Notes' for Astor College regarding	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
		potential scale of development.															
67	151	Reword 'Details' for potential open space within Alfred Place.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
68	156	Reword 'Notes' for 6-17 Tottenham Court Road regarding potential scale of development.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
69	157	Reword 'Notes' for the Network Building regarding potential scale of development.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
70	158	Amend the 'Notes' for the Odeon Site to update timescales.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
71	158	Delete 6-17 Tottenham Court Road from 'Offices' section of the Delivery Plan.	-	-	-	-	x	-	-	-	-	-	-	-	-	-	-
72	158	Reword 'Notes' for the Network Building to clarify the potential scale of development.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
73	159	Delete Middlesex Hospital Annex from medical / healthcare section of the Delivery Plan.	-	x	-	-	-	-	-	-	-	-	-	-	-	-	-
74	159	Reword 'Details' for Arthur Stanley House in relation to existing medical / healthcare uses.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
75	159	Reword 'Notes' for Tottenham Mews Day Hospital regarding potential scale of	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

			Housing	Health & safety	Access to facilities	Equality	Economic Growth	Benefits of regeneration	Design & environment	Land	Private transport	Noise	Water & floods	Biodiversity	Air quality	Energy	Resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
		development.															
76	159	Amend the 'Notes' for the Rosenheim Building to clarify the nature of the potential medical / healthcare uses on this site.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
77	160	On page 160 amend the 'Notes' for the Odeon Site to clarify the nature of the potential medical / healthcare uses on this site.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
78	160	Reword 'Timescale' for Royal Ear Hospital and Medical Students' Union, and clarify figure regarding potential scale of development.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-