

Sustainability Appraisal of Camden's Local Plan – Supplement to the Local Plan Adoption Statement

This statement fulfils the requirements of:

- Regulation 26 a) ii) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
- the Environmental Assessment of Plans and programmes Regulations 2004 Part 4: post adoption procedures

Introduction

This statement has been prepared in compliance with the requirements of regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004, regulation 16 (3) and (4). The Camden Local Plan was adopted on 3rd July 2017. The Local Plan as adopted, accompanying sustainability appraisal and a copy of this statement may be viewed at:

- Pancras Square Library, 5 Pancras Square, London NC1 4AG (Mon – Sat 8am – 8pm, Sun 11pm - 5pm)
- or on the Council website at: www.camden.gov.uk/localplan

In accordance with European and national legislation, development plans must be subject to the Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) processes.

A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from implementing development plans. It is a process for understanding whether policies, strategies or plans promote sustainable development, and for improving them to deliver more sustainable outcomes.

The Strategic Environmental Assessment (SEA) aims to predict and assess the environmental effects that are likely to arise from plans, policies and strategies, such as a Core Strategy. It is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes. For the purposes of the Camden Local Plan, the SEA process was incorporated into the SA process.

Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 (from hereon in referred to as the SEA Regulations) sets out the requirements with regard to the post adoption procedures of the SA/SEA. This statement has been prepared in accordance with this regulation.

In accordance with the SEA Regulations, this statement sets out the following:

- (a) how environmental considerations have been integrated into the Plan;
- (b) how the environmental report has been taken into account;
- (c) how opinions expressed in response to public consultation have been taken into account;
- (d) the reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with; and
- (e) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan

Preparation of the Local Plan

Camden Council took account of the following considerations in preparing the Local Plan:

a) How environmental considerations have been integrated into the plan

Sustainability considerations have been incorporated into the plan through an iterative process where the sustainability appraisal (SA) has informed each stage of the development of policy, through:

Draft Plan – Building on initial scoping work undertaken in 2014, an Interim Sustainability Report January 2015 (Appendix 1) was consulted on alongside the Draft Plan in February – April 2015. It assessed and presented the relevant sustainability issues for Camden,

undertook an assessment of options for policies to deal with the relevant range of issues and contributed to the decision on the preferred options and drafting of the Draft Plan Policies.

Publication and Submission - Further assessment against Camden's sustainability objectives was carried out on the various iterations of the preferred options. Where sustainability issues were identified, the mitigating effect of other policies was assessed and further mitigation measures were promoted where appropriate. The results of this assessment were published in the Scoping Report Update (Appendix 2) and Sustainability Appraisal February 2016 (Appendix 3) and were consulted on alongside the Submission Draft Local Plan in February – April 2016.

Examination – As part of the public examination a number of main modifications were proposed to the Submission Draft Local Plan. The Council prepared a schedule of modifications following the hearings (examination document reference ED36). These modifications were screened and an assessment of any additional sustainability impacts was published and consulted on between January – March 2017 (Appendix 4).

The Inspector's report (May 2017) suggested a number of alterations to the Main Modifications (MM) but paragraph 4 of the report noted that:

“Following the examination hearings, the Council prepared a schedule of proposed MMs (document reference ED36) and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report, and in light of this I have made some amendments to the detailed wording of the main modifications. None of the amendments significantly alters the context of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken.”

(b) How the environmental report has been taken into account

At each stage of development of the Local Plan the findings of the sustainability appraisal were taken into account to inform policy development and ensure that sustainability has been at the heart of the Local Plan.

Importantly the SA identified and appraised options (reasonable alternatives) and draft policies against the Sustainability Framework. Details of the process and detailed appraisals can be found in the SA reports in the of this report. By identifying environmental and wider sustainability issues the SA was able to recommend the most sustainable options, propose mitigation measures and refine policy wording.

For example, the SA process identified that there could be potential negative impacts on canal habitat associated with canal freight. The policy was therefore amended to require further consideration and evidence to be submitted with planning applications for canal freight. The SA process also identified the potential conflict between promoting local energy generation and the Council's aim to reduce poor air quality across the borough. The policy was amended to ensure that the favoured and least harmful options are clear and additional requirements to fully assess the impacts.

Full details of how the findings of each of the SA reports were taken into account in the development of policy can be found in the Sustainability Reports contained in Appendices 1-4 of this report.

(c) How opinions expressed as a result of consultation have been taken into account

Extensive consultation was carried out on the SA reports in line with Regulation 13 of the SEA Regulations and ran in parallel with the consultation on the development of the policies in the Local Plan. A wide range of stakeholders, including statutory environmental bodies, businesses and members of the public, were consulted at each stage of the statutory consultation process. The consultation responses were taken into account alongside the sustainability appraisal and other evidence studies in the drafting of subsequent policies.

Various responses were raised with regards to the SA and these are set out in the Local Plan Consultation Statement (June 2016) which provides comprehensive details of the consultation process which accompanied the development of the Local Plan and demonstrate how responses were taken into account.

(d) Any trans-boundary consultations with other Member States

No trans-boundary consultations with other Member States were deemed necessary for this document.

(e) Reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

The Sustainability Appraisal - February 2016 (Appendix 3) and Consultation Statement June 2016, demonstrate that all reasonable options and alternatives have been considered, setting out a clear explanation of how options and alternatives were generated, appraised, selected or rejected and the role that Sustainability Appraisal and community engagement have played in this process. The Council believe that the Camden Local Plan will direct development in a sustainable manner over the plan period, and this was supported by the Inspector.

(f) Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

The monitoring process is set out in Chapter 11 of the Camden Local Plan and 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 (AMR). Every year Camden monitors and analyses the performance of planning policies and publishes the details in the Authority Monitoring Report.

The AMR assess 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. Monitoring Reports and their implications for future plans will be analysed through subsequent SA Scoping reports.

Appendix 1 – Sustainability Appraisal of Camden’s Local Plan :Interim Report -January 2015

Appendix 2 - Sustainability Appraisal of Camden’s Local Plan: Scoping Report Update – Feb 2016

Appendix 3 - Sustainability Appraisal of Camden’s Local Plan - February 2016

Appendix 4 - Sustainability Appraisal of Proposed main Modifications.

Sustainability Appraisal of Camden's Local Plan: Interim Report

January 2015

Non-technical summary

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

Non-technical summary

The Local Plan

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

SA Scope

The Sustainability Appraisal of the Local Plan is an integrated appraisal in that it incorporates: Health Impact Assessment (HIA); Equalities Impact Assessment (EqIA); and Habitats Regulations Assessment (HRA). This report has been produced to meet the requirements for sustainability appraisal and strategic environmental assessment and essentially seeks to present information on the merits of the draft plan and alternatives.

The approach taken to the development of this sustainability appraisal is based on previous work for the Core Strategy, and Development Policies documents which has informed the baseline data collection and development of sustainability objectives and criteria that form the SA Framework. A Scoping Report for the Local Plan updates the review of plans, policies programmes, and the baseline information provided for the sustainability appraisal of the Camden Core Strategy and Development Policies. This was used to update and amend the sustainability objectives and criteria (the SA Framework) to be used in assessing the sustainability of the Local Plan. The SA Framework covers social, economic and environmental themes.

SA Framework

The SA framework, outlined in Chapter 4 of this report, is the evidence base which is the main tool used in the appraisal of the Local Plan. The framework includes: review of relevant policies, plans and programmes; baseline information; sustainability issues; SA objectives and criteria.

Testing the Local Plan objectives against the SA framework

A series of draft Local Plan objectives were developed to deliver the vision for Camden. These objectives underpin the more detailed plan policies and as such we are required to assess the compatibility of the Local Plan objectives with the SA objectives. The Local Plan objectives were tested against SA objectives to identify whether the plan objectives are compatible or not.

Overall, the plan objectives were shown to be compatible with SA objectives, although there were some instances of incompatibility. This process helped to

identify areas where the Local Plan objectives could be strengthened/made compatible and the recommendations were incorporated into the plan draft.

Appraising alternative options

The SEA Directive requires alternative options to be considered. These help to consider plan options and whether they have significant positive or negative effects. Policy issues were identified in the Council's review of the Core Strategy and Development Plan Documents of Camden's Local Development Framework and early engagement.

For some issues there is an emerging preferred approach, for other issues however, there are appropriate alternative options to be considered. The key policy issues with alternative options to be considered are:

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 policy issue a number of alternative options were developed to be assessed with the SA framework where the positive and negative effects of the options are considered. For each policy issue a preferred option is chosen which is accompanied by the reasons for selecting that option, in light of the appraisal.

Appraising the draft plan policies

The preferred approach has been developed in light of: the assessment of alternative options; the responses to engagement on the key issues for the Local Plan; the evidence we have collected and commissioned; and the review of national, regional and local plans and programmes.

For each of the grouped themes in the Local Plan i.e. Housing, Growth, Transport etc the appraisal identifies and evaluates the likely significant effects.

The appraisal identified positive and some negative effects when assessed against SA objectives and criteria. The negative effects together with recommendations on mitigating measures are outlined below:

- 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.

The appraisal also highlighted areas where the sustainability effects of a policy could be further improved, these are outlined below:

- The positive effects of protecting and improving affordable housing (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 policy on student housing could further be improved with regards to accessibility, in making reference to wheelchair friendly accommodation.
- The positive effects of the air quality policy could further be enhanced by requesting that developments comply with the GLA's air quality neutral policy.
- The water and flooding policy could further improve sustainability objectives by including information on the quality of Regent's Canal, in accordance with EU Water Framework Directive.

- The policy on markets (TC6) sets out a number of criterion which applications for new markets must meet. However, the appraisal recognised that this offers a slightly reserved impression of the council's attitude to markets. Camden has a rich history of markets and contains several that are world famous. The policy could potentially be improved by being more proactive in its approach to markets.

The main recommendation from this Interim SA report is that further work is undertaken to ensure that the negative effects and conflicts identified are addressed as far as possible in the proposed submission plan. Furthermore that further consideration is given to the strengthening of positive effects.

Monitoring

The monitoring process set out in Chapter 11 of the Local Plan 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 Annual Monitoring Report, which assesses progress for a range of areas, including environmental factors such as air quality, biodiversity waste and renewable energy generation; employment and town centres, housing delivery and transport.

How to comment

The consultation on the draft Sustainability Appraisal Report will be in accordance with the following regulations and Camden's Statement of Community Involvement:

- Article 5 (4) of the European Union Directive 2001/42/EC
- The Environmental Assessment of Plans and Programmes Regulations 2004
- Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.

The draft Sustainability Appraisal Report will be sent to the statutory Consultation Bodies with environmental responsibilities:

English Heritage;

Environment Agency; and

Natural England.

1. Introduction

Context

- 1.1 Camden's key planning policy documents, the Core Strategy and Development Policies Document, of the Local Development Framework (LDF) were adopted in November 2010. In consideration of the National Planning Policy Framework (NPPF) 2012, other changes to planning legislation and changing local circumstances, these documents are now under review.
- 1.2 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 and include the recently adopted Site Allocations and Fitzrovia Area Action Plan. The Euston Area Plan and North London Waste Plan would also form part of these documents once adopted.
- 1.3 This document is the Interim Sustainability Appraisal (SA) report which has been prepared alongside the draft Local Plan.

Requirement for Sustainability Appraisal

- 1.4 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' or 'SA', for which the overall aim is to ensure that the plan contributes to the achievement of sustainable development.
- 1.5 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.
- 1.6 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 are addressed.
- 1.7 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 Interim Sustainability Appraisal Report

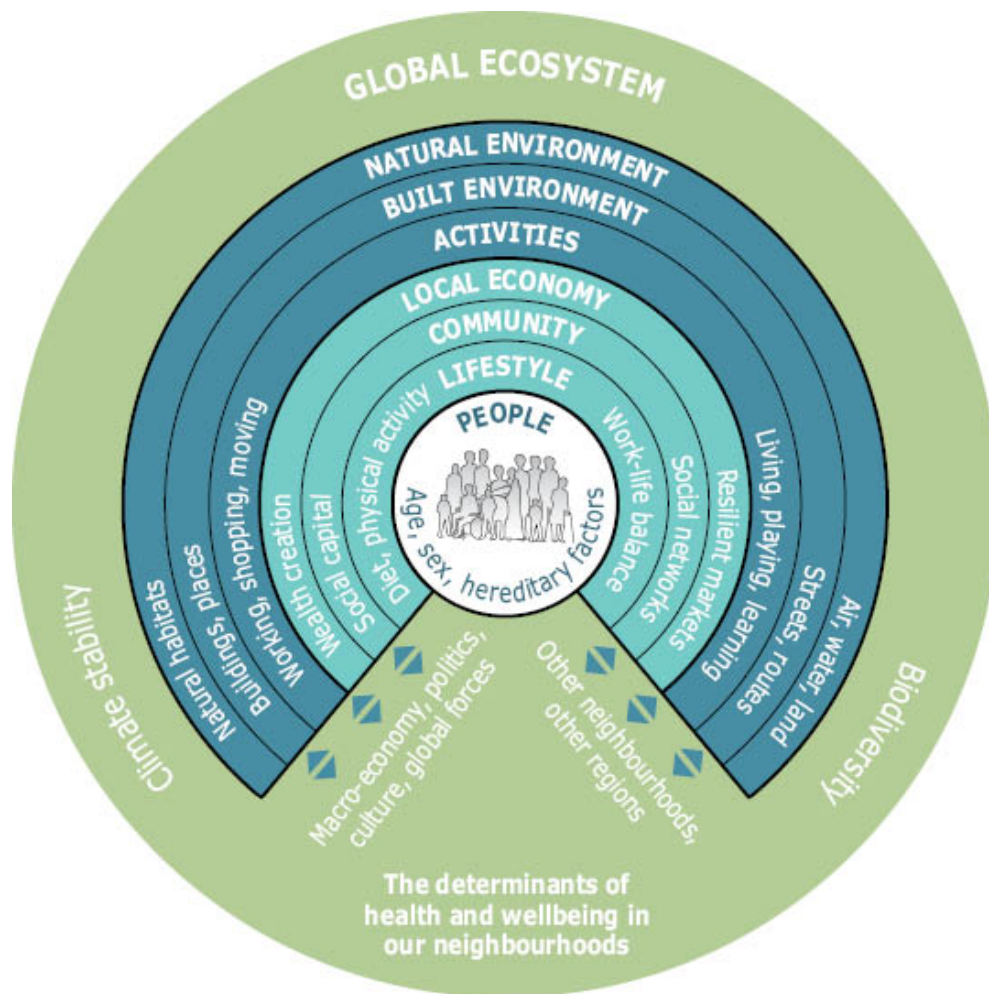
- 1.8 This document essentially seeks to present information on the merits of the draft plan and alternatives. It shows how the Interim SA contributed to the decision on the preferred options and the drafting of the plan for Regulation 18 consultation.
- 1.9 The Core Strategy and Development Policies 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 scoping report provides the framework for the sustainability appraisal of the Local Plan.
- 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 and Fitzrovia Area Action Plan. These documents have been subject to sustainability appraisals, which have influenced their content and approach. This Interim SA therefore needs to be read in this context. It will not reappraise the policy directions of the Camden Site Allocations or Fitzrovia Area Action Plan.

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 will incorporate the following assessments:

Health Impact Assessment (HIA)

- 1.12 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.
- 1.13 The 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 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 well-being. 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 will be a key consideration in this SA and the Local Plan and should run through this document.

1.18 The HIA will assess 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 particularly affected by this is recommended within the assessment. 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.

Interim SA structure

1.23 The Interim 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.

Sustainability conclusions

2. Sustainability appraisal process and methodology

2.1 This report has been produced to meet the requirements for sustainability appraisal and strategic environmental assessment, as established in European and National legislation, regulations and guidance. The Local Plan Scoping Report provides a review of other relevant plans, programmes and sustainability objectives and criteria (the sustainability appraisal framework) for the use in the SA of the Local Plan.

The sustainability appraisal framework

2.2 The SA framework, which sets out the Council's sustainability objectives and criteria, has been the main tool used in the appraisal of the Local Plan at this stage.

2.3 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 10 topic areas for the purposes of outlining baseline information, these are:

- housing
- community and well-being (inc. health)
- economy and employment
- built heritage and landscape
- efficient land use and soil
- air quality
- climate change
- water
- biodiversity and open space
- waste

2.4 The sustainability objectives form the basis of the sustainability appraisal of the draft 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

2.5 The SEA Directive requires that alternative options are considered. Policy issues were identified in the Council's early engagement with councillors, internal departments, developers, landowners, community stakeholders and resident associations, statutory consultees, and interested residents and

groups. For some issues there was an emerging preferred approach but for others it was appropriate to develop alternative options.

- 2.6 For each policy issue the appraisal will outline the reasons for focusing appraisal on the particular issue and will assess the alternative options with the SA framework.

Appraising the preferred approach

- 2.7 Following the assessment of alternative options the preferred approach for the Local Plan will have been identified through: the responses to engagement on key issues; evidence collection; and the review of national, regional and local plans and programmes.
- 2.8 The appraisal of the preferred approach will be undertaken by grouping policies according to theme/topic. Each of the grouped themes will be appraised by assessing the likely significant effects on the baseline, drawing on the sustainability topics / objectives / issues identified in the scoping report. If any negative impacts are identified, mitigation measures will be proposed.
- 2.9 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 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 our current Core Strategy and Development Policies Document of the LDF. This document will then, with the Mayor’s London Plan, form the statutory ‘development plan’ for Camden, the basis for planning decisions in the borough. The recently adopted Site Allocations document and the Fitzrovia Area Action Plan will form part of the Local Plan documents.

3.4 The emerging North London Waste Plan, Gypsy and Traveller Site Allocations, and the Euston Area Plan will form part of Camden’s Development Plan when they are formally adopted at the end of the statutory preparation process.

3.5 There are 13 objectives in the Local Plan, given that this is a review and refresh of the current plan these have not significantly altered. The Local plan objectives will be tested against SA objectives in chapter 5 to ensure compatibility.

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. 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.	National Planning Policy Framework 2012 Planning Practice Guidance superseded – PPSs & PPGs.
2.	The UK Sustainable Development Strategy: Securing the Future (UK Govt 2005)
3.	Sustainable Communities: Building for the Future (ODPM 2003)
4.	Sustainable Communities in London: Building for the Future (ODPM 2003)
5.	The Code for Sustainable Homes: Setting the standard in sustainability for new homes (DCLG February 2008)
6.	The Code of Sustainable Homes: Technical Guide – 2010
7.	The National Adaption Programme, 2013
8.	Climate Change: The UK Programme 2006 (UK Govt 2006)
9.	Transport White Paper-The Future of Transport: A Network for 2030 (DoT 2004)
10.	Cutting carbon, creating growth: making sustainable local transport happen – white paper January 2011
11.	National Air Quality Strategy for England; Wales; Scotland and Northern

Ref No	Document Title and link
	Ireland: Working Together for Clean Air (DEFRA 2000 and updated 2003) The air quality strategy for England, Scotland, Wales and Northern Ireland (Volume 1, 2007; Volume 2, 2011)
12.	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
13.	Building a Greener Future – Towards Zero Carbon Development, 2006
14.	Waste Management Plan for England July 2013 National Planning Policy for Waste 2014
15.	By Design: Urban Design in the Planning System-Towards Better Practice (ODPM and CABE 2000)
16.	Guidance on Tall Buildings (CABE and English Heritage 2007)
17.	The Changing face of the High Street: Decline and Revival (2013) English Heritage
18.	BREEAM Assessment (BRE 2006)
19.	UK Biodiversity Action Plan (1994) Biodiversity 2020: A strategy for England's wildlife and ecosystem services - UK Post 2010 Biodiversity Framework
20.	Working with the Grain of Nature: A Biodiversity Strategy for England (2002)
21.	Fair Society, Healthy Lives, The Marmot Review, 2010
22.	Planning healthier places – report from the reuniting health with planning project, TCPA 2013
23.	Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites – Planning policy for traveller sites (2012)
24.	Thames Corridor Abstraction Management Strategy (Environment Agency, June 2004)
25.	The Community Infrastructure Levy Regulations 2010 and amendments 2014

Ref No	Document Title and link
26.	Model Procedures for the Management of Contaminated Land (Contaminated Land Report 11) (Environment Agency, September 2004)
27.	Thames Region Catchment Flood Management Plan (consultation document, Environment Agency, January 2007)
28.	Environment Agency River Basin Management Plan, Thames River Basin District (2009)
29.	Sustainable Drainage Systems – An Introduction (Environment Agency, May 2003) Can be ordered from the Environment Agency on telephone 08708 506506 or following the Publication Catalogue link on their web page http://publications.environment-agency.gov.uk/epages/eapublications.storefront
30.	Bringing your rivers back to life – A Strategy for restoring rivers in North London (Environment Agency, February 2006)
31.	Understanding place: conservation area designation, appraisal and management (English Heritage March 2011)
32.	Transport and the historic environment (English Heritage, March 2004)
33.	Streets for All London Manual (English Heritage, March 2000)
34.	Regeneration and the historic environment (English Heritage, January 2005)
35.	Retail Development in Historic Areas (English Heritage, December 2005)
36.	Guidance on the Setting of Heritage Assets (2011)
37.	Seeing history in the view 2011
38.	Local Green Infrastructure: Helping communities make the most of their landscape, September 2011
London	
39.	The London Plan Spatial Development Strategy for Greater London 2011 – revised early minor alterations 2013
40.	The Mayor's Transport Strategy GLA 2010

Ref No	Document Title and link
41.	Town Centres SPG 2014
42.	Clearing the air: The Mayor's Air Quality Strategy (December 2010)
43.	Connecting with London's Nature: The Mayor's Biodiversity Strategy (2002) All London Green Grid, 2012
44.	Preparing borough tree and woodland strategies, 2013
45.	The Mayor's Economic Development Strategy for London (May 2010)
46.	Green Light to Clean Power: The Mayor's Energy Strategy (2004)
47.	Making business sense of waste: The Mayor's business waste strategy for London (November 2011)
48.	London's wasted resource: The Mayor's municipal waste management strategy
49.	Sounder City: The Mayor's Ambient Noise Strategy (March 2004)
50.	Cultural Metropolis: The Mayor's cultural strategy – 2012 and beyond, 2010
51.	Accessible London: Achieving an inclusive environment, 2014
52.	The Mayor's Housing SPG 2012
53.	The Mayor's Sustainable Design and Construction SPG, 2014
54.	The control of dust and emissions during construction and demolition, 2014
55.	Draft Social Infrastructure SPG, 2014
56.	Land for Industry and Transport, 2012
57.	London Planning Statement, 2014
58.	Shaping neighbourhoods: play and informal recreation, 2012
59.	Shaping neighbourhoods: Character and context, 2014
60.	Geodiversity of London (draft), July 2008
61.	Rapid Health Impact Assessment Tool, Healthy Urban Development Unit,

Ref No	Document Title and link
	2013
62.	Planning and Equality and Diversity in London (October 2007)
63.	London View Management Framework SPG (March 2012)
64.	London Boroughs Gypsy and Traveller Accommodation Needs Assessment 2008
65.	The Mayor's Climate Change Mitigation and Energy Strategy 2011
66.	Mayors draft Climate Change Adaptation Strategy (2010)
67.	Crossrail Mayoral CIL, 2012
68.	Better Environment, Better Health. A GLA guide for London's Boroughs, London Borough of Camden 2013
Local	
69.	The Camden Plan 2012 - 2017
70.	Camden Core Strategy, 2010
71.	Camden Development Policies, 2010
72.	Camden Site Allocations, 2013
73.	Camden Planning Guidance
74.	Conservation Area Appraisal and Management Strategies
75.	London Borough of Camden Annual Monitoring Report – 2012/13
76.	Euston Area Plan – submission draft 2014
77.	Bloomsbury - A Strategic Vision (Farrells) 2006
78.	Camden Housing Strategy 2011 – 2016
79.	Camden Housing Need Study Update, 2008
80.	Camden Social Inclusion Strategy (2003)
81.	Tackling Inequality: Camden's Equality Scheme 2005-2008 and Action Plan (LB Camden 2005) & Task force report 2013
82.	Green Action for change – Camden's Sustainability plan 2011 - 2020

Ref No	Document Title and link
83.	Camden Air Quality Action Plan 2013 -2015
84.	Creative and Cultural Industries in Camden, 2009
85.	Camden Transport Strategy (LIP) 2011-2031
86.	Camden's Noise Strategy (2002)
87.	The Camden Biodiversity Action Plan 2013 – 2018
88.	Camden Strategic Flood Risk Assessment, 2014
89.	Camden's Flood Risk Management Strategy 2013
90.	Camden's Surface Water Management Plan, 2011
91.	Preliminary Flood Risk Assessment: Drain London - London Borough of Camden 2011
92.	Building Schools for the Future – Indicative Strategy for Change Part 1 (LBC 2007)
93.	Change for children and families, delivering the Camden Plan 2012
94.	Camden Open Space, Sport and Recreation Study Review; Atkins; 2014
95.	Camden Statement of Licensing Policy 2011
96.	Let's Talk Rubbish – Camden Waste Strategy 2007 - 2010
97.	Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050; SEA-Renue; 2007
98.	Carbon Management Plan 2010 – 2020
99.	Camden Employment Land Review 2008
100.	Camden Employment Land Study, 2014
101.	Camden Retail and Town Centre Study, GVA 2013
102.	Camden Local Economic Assessment 2011
103.	Camden's Joint Strategic Needs Assessment 2013
104.	Infrastructure study update, 2014

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 draft Further Alterations to the London Plan indicate 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 the same basis, and forms our target for housing supply. Camden's need is 1,073 additional homes per year, which is equivalent to a rounded target of 16,100 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 students and older people.

- 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.
- 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). Draft 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 also 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 well-being (inc. health)

- 4.18 Camden's Joint Strategic Needs Assessment (JSNA) 2013 describes the current and future health and well-being 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 Cantelowes 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 Camden'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 Camden 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 Camden'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 in Camden rank very high in unemployment, whereas others rank very low, showing a clear socio-economic divide in the borough.

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 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 Camden 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 is currently being drafted which identifies

historic buildings and features that are valued by the local community and that help give Camden its distinctive identity.

- 4.34 There are 5645 buildings or structures in the borough that have been listed by English Heritage as having special architectural or historical interest. Since 2010 the number of heritage buildings at risk has been reduced by 13.

Likely evolution without the plan

- 4.35 Camden 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

- 4.36 Camden 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.
- 4.37 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

- 4.38 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 takes into consideration and mitigates against 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

- 4.39 There are currently no sites in Camden 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 across the borough.
- 4.40 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. However, in 2012/13 one scheme was permitted that involved development on privately accessed protected public open space, this was the redevelopment of Gondar Gardens former reservoir that was allowed on appeal (2011/0395/P).

Likely evolution without the plan

- 4.41 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

- 4.42 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.
- 4.43 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.

- 4.44 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.
- 4.45 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

- 4.46 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.
- 4.47 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 and open space biodiversity, open space, green infrastructure

- 4.48 Camden has over 527 hectares of parks and open spaces. The areas of greatest deficiency access to public parks are identified in paragraph 4.18 above.
- 4.49 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.
- 4.50 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

- 4.51 As indicated above, Camden 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.
- 4.52 Furthermore, growth in the borough places further pressure on our open spaces so they need to either be improved and/or increased.

Waste

- 4.53 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 arisings 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

- 4.54 Camden 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.
- 4.55 The borough continues to favour retention over demolition and innovative sustainable construction methods which help to contribute towards reducing carbon emissions in the borough. Without strong policies to ensure this continues the impact on reducing carbon emission is likely to decline.

Sustainability issues and objectives

- 4.56 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. Issues and objectives are grouped under ten 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 (DCLG/ Land Registry 2014).</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).</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 2013 London Strategic Housing Market Assessment, and shows an annual</p>

buildings and infrastructure.	<p>need of 1,073 additional homes per year in Camden, equivalent to a total of 16,100 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 well-being (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>Number of noise complaints has decreased but remains an important issue in terms of amenity, health and well-being.</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 in the borough.</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
7 - To promote high quality and sustainable urban design which protects and enhances the historic environment.	<p>Development and protection of Camden's historic environment (40 conservation areas, 5645 listed buildings, 13 archaeological Priority Zones and 1 ancient monument).</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 makes efficient use of land,	Land use pressures and conflicts between uses, particularly the demand for higher value housing development and the potential threat this creates for employment generating

buildings and infrastructure.	land uses and other uses -how we use our limited land? 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.
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Topic 6 – Air quality (incl. transport)

SA Objectives	Issues
9 - To reduce reliance on private transport modes and enhance permeability for non-motorised travellers.	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. The number of people killed or seriously injured in road accidents has not improved significantly from 2007 – 2011.
14 - To improve air quality.	Parts of Camden have some of the poorest air quality in London. Camden continues to breach annual mean air quality targets for nitrogen dioxide. Road transport, energy generation and the operation of some industrial processes serve as a source of air pollution in the borough.

Topic 7 – Climate change

SA Objectives	Issues
15 - To provide for the efficient use	Factors outside our control in reducing carbon emissions such as the risk of higher

SA Objectives	Issues
of energy.	<p>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> <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</p>

	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 sustainability framework

- 5.1 A series of draft Local Plan objectives were developed to deliver the vision for Camden. These objectives underpin the more detailed plan policies and as such we are required to assess the compatibility of the Local Plan objectives with the SA objectives. The draft objectives for the Local Plan are outlined below:
- i. To create the conditions for growth, ensuring it takes place in the most appropriate locations, and harnessing its benefits so that it meets the needs of Camden's communities for homes, jobs and services and protects and enhances the borough's unique character and appearance.
 - ii. To secure socially mixed and balanced areas with strong and cohesive communities, supporting the provision of facilities and services needed to meet communities' needs.
 - iii. To provide homes that meet the housing needs of existing and future residents in terms of number, affordability, quality, type of property and mix of sizes.
 - iv. To strengthen Camden's nationally-important economy and support business growth while ensuring local people benefit through increased access to jobs, skills, training and education opportunities to reduce inequalities in the borough, ensuring nobody gets left behind.
 - v. To support the success of our town and neighbourhood centres and the retail areas in Central London, while adapting to changes in their role and how people shop.
 - vi. To promote and support the successful development of the growth areas of King's Cross, Euston, Tottenham Court Road, Holborn and West Hampstead, and ensure that development, both there and elsewhere, is supported by necessary infrastructure and maximises the opportunities and benefits for the local community and the borough as a whole.
 - vii. To promote high quality, safe and sustainably designed buildings, places and streets and preserve and enhance the unique character of Camden and the distinctiveness of our many conservation areas and our other historic and valued buildings, spaces and places.

- viii. To promote walking, cycling and public transport in the borough to reduce air pollution, reliance on private cars and congestion, and to support and promote new and improved transport links, although the Council remains opposed to HS2.
- ix. To make sure that development in Camden minimises its energy use, achieves the highest possible environmental standards, and is designed to adapt to, and reduce the effects of, climate change.
- x. To improve and protect Camden's Metropolitan Open Land, parks and open spaces, and promote and enhance biodiversity in the borough.
- xi. To promote healthier lifestyles and support improvements to the health and well-being of Camden's population to reduce health inequalities in the borough.
- xii. To promote and protect the high levels of amenity and quality of life that makes Camden such an attractive, successful and vibrant place.
- xiii. To reduce, plan for and manage Camden's waste, including by working with our partner boroughs in the North London Waste Authority area to work towards self- sufficiency within London as a whole.

5.2 Testing the compatibility of Local Plan objectives against SA objectives helps to refine plan objectives. Local Plan objectives also need to be consistent with SA objectives and testing them against each other is one way of checking this. The assessment was made using the table below to identify whether the objectives are compatible, not compatible, no relationship or that the compatibility is uncertain.

Table 3. Testing the compatibility of Sustainability 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. Design and 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 and 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	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 and 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 and heritage; air quality; energy and resources.</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; 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
<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> <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.</p>																

xii. Amenity	?	+	+	+	?	+	+	?	+	+	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 and heritage; 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	+
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.																

Recommendations

- 5.3 The table of compatibility above clearly illustrates the compatibility of Local Plan objectives with SA objectives. Overall, it is considered that the draft Local Plan objectives are generally compatible in seeking to achieve sustainable development. Nonetheless, this process has helped to identify areas where Local Plan objectives could be strengthened and these are outlined below, with **added text in green**.
- 5.4 Care will need to be taken to ensure that one objective does not outweigh or preclude achievement of another objective. However, this is not unusual and is considered to be a reasonable part of the balancing act required to meet a range of aims within one document.
- 5.5 There are instances where the objectives are not compatible or that the effects are uncertain. There are also conflicts where plan objectives seek to promote growth, increase housing to meet need and strengthening the boroughs economy upon amenity, air quality, and biodiversity. These conflicts are primarily addressed in the revision of objective 1 below by ensuring that growth 'minimises the impacts associated with development'. Local plan policies should provide further detail on the consideration of these impacts.
- i. To create the conditions for growth, ensuring it takes place in the most appropriate **and sustainable** locations, **minimises the impacts associated with development** and harnesses its benefits so that it meets the needs of Camden's communities for homes, jobs and services and **preserves** and enhances the borough's unique character and appearance.
 - ii. To secure **safe**, socially mixed and balanced areas with strong cohesive **and resilient** communities **to help reduce inequality in the borough whilst** supporting the provision of **accessible** facilities and services needed to meet communities' needs.
 - iii. To provide homes that meet the housing needs of existing and future residents in terms of number, affordability, quality, type of property and mix of sizes. **Self-contained housing will be the priority use of the Local Plan.**
 - iv. To strengthen Camden's nationally-important economy and support business growth **and the knowledge economy sectors** while ensuring local people benefit through increased access to jobs, skills, training and education opportunities to reduce inequalities in the borough, ensuring nobody gets left behind.
 - v. **To support Camden's valuable contribution to London's regional , national and international role, in terms of business and employment, research, education and medicine; shopping and entertainment, culture, entertainment and tourism and to help shape our places to make sure this meets the needs of and brings benefits to residential communities as well as those who work in and visit the borough.**

- vi. To support the **existing and future successful development** of our town and neighbourhood centres and the retail areas in Central London, while adapting to changes in their role and how people shop.
- vii. To promote and support the successful development of the growth areas of King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead, **and Central London** and ensure that development, both there and elsewhere, is supported by necessary infrastructure and maximises the opportunities and benefits for the local **and surrounding** communities and the borough as a whole.
- viii. To promote high quality, safe and sustainably designed buildings, places and streets and preserve and enhance the unique character of Camden and the distinctiveness of our many conservation areas and our other historic and valued buildings, spaces and places.
- ix. To promote walking, cycling and public transport **for all** in the borough **and to make Camden a better place to cycle and walk around** to reduce air pollution, reliance on private cars and congestion, and to support and promote new and improved transport links, although the Council remains opposed to HS2.
- x. To make sure that development in Camden minimises its energy use **by encouraging local efficient energy generation**, achieving the highest possible environmental standards, and is designed to adapt to, and reduce the effects of, climate change.
- xi. To improve and protect Camden's Metropolitan Open Land, parks and open spaces, and ~~promote~~ **protect** and enhance biodiversity, **in addition to providing for new habitats and open space**.
- xii. To promote healthier lifestyles and support improvements **that contributes** to the health and well-being of Camden's population, to reduce health inequalities in the borough.
- xiii. To promote and protect the high levels of amenity and quality of life that makes Camden such an attractive, successful and vibrant place.
- xiv. To reduce, plan for and manage Camden's waste, including by working with our partner boroughs in the North London Waste Authority area to work towards self- sufficiency within London as a whole.

Conclusions

- 5.6 This part of the appraisal will help to improve the sustainability of the draft objectives (and their implementation through detailed policies) and subsequently have a positive influence on the development and refinement of options for the draft Local Plan.
- 5.7 The results of this appraisal should also provide a good basis for determining whether or not a potential option is likely to advance the principles of sustainability, something that the draft strategic objectives are considered overall to do particularly well. It will be important that the policies contained

within the Local Plan help to implement the objectives, building on their success in seeking to achieve sustainable development.

6. Appraising alternative options

Introduction

- 6.1 The SEA Directive requires alternative options to be considered. These help to consider plan options and whether they have significant positive or negative effects. Policy issues were identified in the Council's review of the Core Strategy and Development Plan Documents of Camden's Local Development Framework and early engagement, including: councillors, internal departments, developers, landowners, community stakeholders and resident associations, statutory consultees, and interested residents and groups.
- 6.2 For some issues there is an emerging preferred approach, for other issues however, there are appropriate alternative options to be considered. The key policy issues with alternative options to be considered are:

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	

Each policy issue 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;
 - the reasonable alternatives;
 - summary of appraisal findings; and
 - the reasons for selecting the preferred approach, in light of appraisal.
- 6.3 The next stage of the appraisal process is to appraise the alternative options with the SA framework. Effects are predicted taking into account the regulations; so, for example, account is taken of the: duration; geographic scale; reversibility; and any cumulative effects.

Methodology

- 6.4 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 is also considered.

Appraisal findings

- 6.5 A summary of appraisal findings is set out below, with detailed appraisal findings presented in Appendix C.

Affordable housing sliding scale

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

- 6.6 In 2008, it is estimated that the need for additional affordable homes (including a steady reduction in the existing backlog) was 4,876 per annum. The gross existing (backlog) need was estimated as 6,759 homes, equivalent to 7% of all Camden's households. On the basis of a "balanced housing market" model, the 2008 study estimated that affordable home requirements were 314 homes or 52.8% of the (then) annual housing monitoring target of 595 additional homes per year.
- 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.
- 6.8 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 m² gross additional floorspace), but for smaller schemes the sliding scale applies - 10% for 10 additional homes (or 1000m² gross of additional floorspace), 20% for 20 homes/ 2000m², 35% for 35 homes/3500m² etc.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

- 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 (e.g. sliding scale applies from 10 to 30 additional homes)
- 3: Set a flat affordable housing percentage target regardless of scheme size i.e. no sliding scale

Summary of assessment findings

- 6.9 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 also likely to have minor positive impacts on objectives relating to housing, poverty (social exclusion) sustainable communities and vacant land (efficient development density).
- 6.10 Option 2 seeks to retain a sliding scale but with higher affordable housing targets than currently for smaller schemes. It is likely to provide more affordable housing, but there is some risk that it would fail 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.
- 6.11 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 (well-being 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 alternative options appraisal

- 6.12 The preferred approach is Option 2, subject to financial viability appraisal indicating that Option 2 is the most practical option for maximising affordable housing delivery without reducing the number of homes on small sites and the overall housing delivery.

Affordable housing tenure

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

- 6.13 The existing 60-40 (social affordable/intermediate) split is consistent with the London Plan, and reflects the findings of the 2008 Housing Needs Survey update that 75% of those in need of affordable housing could afford to pay higher than social rents. 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).

- 6.14 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.
- 6.15 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.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

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.

Summary of assessment findings

- 6.16 Option 1 would be likely to have a minor positive impact on objectives relating provision of housing/ affordable housing and poverty (social inclusion).
- 6.17 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).
- 6.18 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.
- 6.19 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 alternative options appraisal

- 6.20 The preferred approach is to progress Option 1, subject to what is shown by the financial viability appraisal of the plan. 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

- 6.21 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 homes in Use Class C3. Consequently there is less scope to protect HMOs through planning policy than when the current policy (DP9) was drafted.
- 6.22 There are indications that the number of HMOs has declined since the 2004 Camden Private House Condition Survey, and the Permitted Development right could accelerate the decline. 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.
- 6.23 The current approach may therefore not fully reflect contemporary planning legislation and housing aspirations.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

- 1: Continue to protect existing HMOs
- 2: Allow HMOs to be converted to self-contained housing

Summary of assessment findings

- 6.24 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.
- 6.25 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 alternative options appraisal

- 6.26 The preferred approach is to progress Option 1 as it has positive impacts on housing and poverty objectives, and has no negative impacts on SA objectives.

Mix of house sizes

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

- 6.27 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.
- 6.28 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. Emerging housing needs evidence indicates that a priority for 3-bed homes could be more appropriate in the future.
- 6.29 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.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

- 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.

Summary of assessment findings

- 6.30 Option 1 would be likely to have a minor positive impact on objectives relating to housing, poverty (social cohesion) and sustainable communities (local people).
- 6.31 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 meet the needs of wealthier

people rather than needs of the wider population. There would also be a minor positive impact on efficient use of land and buildings (vacant land).

Outline reasons for selecting preferred approach in light of alternative options appraisal

- 6.32 The preferred approach 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 and 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

- 6.33 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.
- 6.34 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.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

- 1: Prioritise self-contained housing
- 2: Prioritise all housing, including student housing

Summary of assessment findings

- 6.35 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.
- 6.36 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.
- 6.37 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 alternative options appraisal

- 6.38 The preferred approach 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

- 6.39 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.
- 6.40 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.
- 6.41 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.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

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

Summary of assessment findings

Option 1A and 1B

6.42 Option 1A would potentially have positive impacts on housing and sustainable communities by securing housing available to wide range of people including local people, whereas Option 1B would have negative ones. However Option 1A would potentially have a negative impact on economic growth objectives for the higher education sector where Option 1B would have a positive impact.

Option 2A and 2B

6.43 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 in the higher education while Option 2B could have negative impacts by allowing a loss of housing for students.

Outline reasons for selecting preferred approach in light of alternative options appraisal

6.44 The preferred approach 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

- 6.45 Paragraph 21 of the NPPF states that LPA's should "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"
- 6.46 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 will seek to introduce an Article 4 Direction in certain geographic areas in the borough.
- 6.47 The current approach is to retain land and buildings suitable for continuous business use.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

- 1: The current approach is to retain land and buildings suitable for continuous business use.
- 2: Allowing 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.

Summary of assessment findings

- 6.48 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).
- 6.49 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.
- 6.50 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.

Outline reasons for selecting preferred approach in light of alternative options appraisal

- 6.51 The preferred approach 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.

Industrial areas

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

- 6.52 Camden has one of the lowest stocks of industrial and warehousing space in London. One major 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.
- 6.53 According to the latest Employment Land Study 2014 there is a low vacancy level in the Industry Area 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.
- 6.54 Current approach is to protect the borough's main Industry Area from non-industrial/warehousing uses.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

- 1: Continue to protect the Kentish Town Industrial Area
- 2: Intensify uses within the Industrial Area whilst introducing other uses such as housing and offices.

Summary of assessment findings

- 6.55 Option 1 could have a 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.

Outline reasons for selecting preferred approach in light of alternative options appraisal

- 6.56 The preferred approach is to progress Option 2 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 whilst making the most efficient use of the Camden's limited land in order to support Camden's growth.

Advertisements

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

- 6.57 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.
- 6.58 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.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

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.

Summary of assessment findings

- 6.59 The main impact of the assessment centres on 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 by: protecting the character and amenity of areas including conservation areas; will stop unsightly proliferations of signage, will reduce street clutter; and prevent 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 alternative options appraisal

- 6.60 The preferred approach is Option 1, as 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

- 6.61 There is ongoing concern about basement development from local groups 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.
- 6.62 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.
- 6.63 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 through diminishing the vegetation and character of gardens by building underneath them.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

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

Summary of assessment findings

- 6.64 All basement development has an effect on the ground and water conditions. Cumulative effects are difficult to assess. More prescriptive limits would have a 'precautionary principle' effect and are through preventing development are likely to have a positive effect on water and soil conditions.

6.65 Basement development in the borough is usually for ancillary residential space (pools, gyms, storage, entertainment) and does not contribute to housing supply.

Option 1

6.66 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.

Option 2

6.67 In addition to the water benefits of Option 1, Option 2 is likely to have some minor positive effects on biodiversity and amenity values by further restricting basements extending underneath gardens. There are also likely to be 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 alternative options appraisal

6.68 The preferred approach is Option 2, as it achieves benefits in terms of amenity, water, biodiversity, and waste.

Local green space

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

6.69 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.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

1: Promote the principle of designating Local Green Space

2: Identify specific areas as Local Green Space in the Local Plan

Summary of assessment findings

- 6.70 Option 1, encourages communities to take the lead in identifying local green spaces. 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 alternative options 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, the preferred approach 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 of our Open Space, Sport and Recreation Study.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

1. Maintain existing public open space provision standards of 9m² per person?

2. Increase our public open space targets to 13m² per person as recommended by Atkins for residential?

Summary of assessment findings

- 6.75 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.
- 6.76 Option 2 proposes an increase to the open space standard. While this may appear desirable in terms of generating a higher requirement for 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).
- 6.77 The Council will potentially use the Community Infrastructure Levy (to be introduced in 2015) to fund strategic improvements to open spaces, e.g. Park Improvement 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 alternative options appraisal

- 6.78 In consideration with the above the Council will progress option 1. While 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

- 6.79 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.
- 6.80 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).
- 6.81 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.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

- 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

Summary of assessment findings

- 6.82 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.

6.83 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 alternative options appraisal

6.84 Option 1 (Introduce car-free across the whole of the borough) is preferred to Option 2 (Introduce car-free housing for additional parts of the borough and car-capped housing for areas with lower PTAL ratings). 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 however 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

6.85 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 (7% overall) when compared to the London and the UK.

6.86 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.

6.87 Option 3 is a mixed approach, maintaining the stock of A1 shops premises in primary frontages (as with Alternative 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).

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

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

Summary of assessment findings

6.88 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.

6.89 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.

6.90 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 alternative options appraisal

6.91 Preferred approach 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

- 6.92 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 are no longer economically viable. However this approach has meant that we have been most successful in protecting pubs that have a community facility, such as space for evening classes, clubs, meetings etc even though these pubs have shown to be important to the local community. 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.
- 6.93 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.

Alternative options

In light of the above discussion, the reasonable alternatives are as follows:

- 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

Summary of assessment findings

- 6.94 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. (desirability of converting – suitable for families – quality of accommodation provided)
- 6.95 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.

6.96 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 alternative options appraisal

6.97 Option 1 and 2 are fairly similar although the positive effects of option 2 on the provision of community facilities and development that facilitates social cohesion. There would also likely be quite minor positive effects on economic growth whereby the presence of a pub likely supports and stimulates growth of other night-time economies such as restaurants. The preferred approach therefore is to progress option 2.

6.98 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;
- evidence we have collected and commissioned; and
- national, regional and local plans and programmes.

Methodology

7.2 For the purposes of appraisal the preferred policies have been grouped according to theme/topic.

7.3 For each of the grouped themes 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.

7.4 Where, if any, negative impacts are identified we have proposed measures to mitigate against those negative impacts. In addition, where improvements are identified to strengthen the positive effects of plan policies, these will be incorporated into the plan draft where appropriate at this stage.

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 in the area. This policy will therefore help

deliver significant positive benefits through 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), though there could be potential **negative impacts** associated with development in or adjacent to conservation areas or relating to heritage assets, which would need to be mitigated through the more detailed policies in the plan.

Summary and recommendations

- 7.9 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 policies within the Local Plan.
- 7.10 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 policies within the plan.

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

- 7.11 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).
- 7.12 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

- 7.13 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.
- 7.14 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).

- 7.15 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.
- 7.16 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.
- 7.17 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.
- 7.18 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.
- 7.19 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.

- 7.20 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

- 7.21 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.
- 7.22 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.
- 7.23 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.
- 7.24 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.
- 7.25 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

- 7.26 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

- 7.27 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.

- 7.28 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).
- 7.29 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.
- 7.30 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 well-being 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.
- 7.31 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).
- 7.32 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).

- 7.33 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).
- 7.34 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

- 7.35 Housing policies H7 – H11 have shown to have both minor and major positive effects on sustainability objectives.
- 7.36 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.
- 7.37 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.
- 7.38 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 well-being

C1 Improving and promoting Camden's health and well-being

C2 Community facilities and leisure

C3 Pubs

C4 Safety and security

C5 Access for all

Major positive effects

7.39 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 well-being 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.

7.40 Policy C3 seeks to protect pubs that are of particular value to the local community and ensure that historic fabric and features are retained wherever possible. 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.

7.41 The focus of policy C4 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.

7.42 Policy C5 (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

7.43 Minor positive effects relate to sustainability issues such as housing quality, social exclusion, equality, and employment.

7.44 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.

- 7.45 Policy C3 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 is supportive of the development of higher education facilities which in turn stimulates research and jobs.
- 7.46 Policy C2 expects community 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.
- 7.47 Minor positive effects have been identified under SA objectives 4 & 7 with regards to C4. 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.
- 7.48 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

- 7.49 The community and health and wellbeing policies have shown to have both minor and major positive effects on sustainability objectives.

7.50 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:

7.51 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.

7.52 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.

7.53 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:

7.54 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.

7.55 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

- 7.56 The town centre and shopping policies have shown to have both minor and major positive effects on sustainability objectives.
- 7.57 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. The policy could potentially be improved by being more proactive in its approach to markets. Links with growth areas could be suggested.

Economy and jobs

E1 Promoting a successful and inclusive Camden economy

E2 Employment premises and sites

E3 Tourism

Major positive effects

- 7.58 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.
- 7.59 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.
- 7.60 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, where the plan ensures efficient use of land through maximising densities, where appropriate.

Minor positive effects

- 7.61 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.
- 7.62 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 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.
- 7.63 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.
- 7.64 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.
- 7.65 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

- 7.66 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.
- 7.67 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

- 7.68 All transport policies share the aims of SA objective 9 and therefore these policies are considered to have major positive effects in this respect.
- 7.69 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.
- 7.70 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

- 7.71 All transport policies will provide minor positive effects in reducing the use of fossil fuels, CO₂/greenhouse gas emissions and improvements in air quality relating to SA objectives 14 - 16.
- 7.72 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 7 and 12.

- 7.73 There could possibly be amenity benefits arising from policies T1 and T2 through reduced traffic noise however, more positive effects would be felt from the Council's work in calming measures at identified noise hot spots as identified by Defra.
- 7.74 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).
- 7.75 Policy T2 requires all future development to be car free. Those less mobile (but not necessarily disabled) 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 would not provide housing that meets local needs (**negative effect**). 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.
- 7.76 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.

- 7.77 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).
- 7.78 The safeguarding of projects identified within T3 has the potential to cause **negative effects** (i.e. 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.
- 7.79 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

- 7.80 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.
- 7.81 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.

- 7.82 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.
- 7.83 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 will be 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

- 7.84 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 500m² 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 for CfSH and 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 should 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.

- 7.85 Policies CC1 and CC2 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.
- 7.86 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 Local Flood Risk Zones; greenfield run-off rates are achieved and where not possible run-off levels pre-development are not exceeded post-development; and 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.
- 7.87 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.
- 7.88 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

- 7.89 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.
- 7.90 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.
- 7.91 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 NO_x 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.

- 7.92 Policy CC2 promotes the sustainable use of water resources by requiring 50 per cent credits in the water category for CfSH to be achieved and 60 per cent of credits in BREEAM. 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.
- 7.93 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.
- 7.94 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

- 7.95 Both mitigation and adaptation policies have shown to have both major and minor positive effects, although there are clear conflicts between these policies with design and heritage and air quality.
- 7.96 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.
- 7.97 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.

7.98 There are significant negative effects on air quality with the expansion of CHP 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

7.99 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.

7.100 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

7.101 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).

7.102 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.

- 7.103 With respect to the SA objective 7 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 D5 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.
- 7.104 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.
- 7.105 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.
- 7.106 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.

Minor negative effects

- 7.107 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.
- 7.108 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

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

7.110 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

7.111 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.

7.112 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. Policy A4 clearly states that noise generating development will not be acceptable if they exceed Camden's noise thresholds. 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.

7.113 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 well-being.

Minor positive effects

7.114 Minor positive effects connect to issues such as healthy living, reducing carbon emissions, protecting biodiversity and water quality.

7.115 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 well-being of those living in accommodation where these requirements are applied.

- 7.116 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.
- 7.117 Policy A1 requires the consideration of artificial sources of lighting and policy A4 sets the principle of designating 'Quiet Areas' in the borough, both will likely have a minor positive effect in protecting natural habitats and biodiversity. The designation of Quiet Areas would have positive effects on protecting and enhancing biodiversity and habitats but this is dependent on whether the Council, or neighbourhood groups preparing a neighbourhood plan, proceeds to designate local green space with tranquil quality in the borough.
- 7.118 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.
- 7.119 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

- 7.120 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.

7.121 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 well-being.

Open space and biodiversity

A5 Provision, Protection and Enhancement of our Open spaces

A3 Biodiversity and trees

Major positive effects

7.122 Policies A5 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 A5 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.

7.123 Policy A5 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

7.124 Policies A3 and A5 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.

7.125 Policy A5 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).

7.126 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

7.127 Both policies are shown to have minor and major positive effects when assessed with SA objectives and related criteria.

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 all SA objectives and criteria.

Negative impacts

8.2 The negative impacts identified in this appraisal are highlighted in Chapter 7 and are summarised below, together with recommendations to mitigate these impacts.

- 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.

Strengthening positive effects

8.3 The appraisal was useful in identifying areas of the plan which could be further improved and actually serve to strengthen positive impacts in relation to SA objectives and criteria. The majority of these 'improvements' (outlined below) have been incorporated into the Local Plan at a later drafting stage.

- The positive effects of protecting and improving affordable housing (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 policy on student housing could further be improved with regards to accessibility, in making reference to wheelchair friendly accommodation.
- The positive effects of the air quality policy could further be enhanced by requesting that developments comply with the GLA's air quality neutral policy.
- The water and flooding policy could further improve sustainability objectives by including information on the quality of Regent's Canal, in accordance with EU Water Framework Directive.

- The policy on markets (TC6) sets out a number of criterion which applications for new markets must meet. However, the appraisal recognised that this offers a slightly reserved impression of the council's attitude to markets. Camden has a rich history of markets and contains several that are world famous. The policy could potentially be improved by being more proactive in its approach to markets.

Recommendations

- 8.4 The main outstanding recommendation from this Interim SA report is that further work is undertaken to ensure that the negative effects and conflicts identified are addressed as far as possible in the proposed submission plan. Furthermore that further consideration is given to the strengthening of positive effects.

How has the Sustainability Appraisal influenced the process so far?

- 8.5 The process indicated where changes could be made to enhance the positive effects of the Local Plan, which have been incorporated into the consultation draft wherever possible, with further improvements to be made in the proposed submission draft. The appraisal has also highlighted areas where there will be negative effects in relation to SA objectives and criteria which has guided thinking on mitigation measures to eliminate or reduce these effects.
- 8.6 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 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 draft Plan;
 - 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 where policies needed to align better with EU Directives, such as Water.
- 8.7 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

- 8.8 The monitoring process set out in Chapter 11 of the Local Plan 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 Annual Monitoring Report, which assesses progress for a range of areas, including environmental factors such as air quality, biodiversity waste and renewable energy generation; employment and town centres, housing delivery and transport.

What happens next?

- 8.9 Appraisal findings and consultation responses (informed by appraisal findings) will be taken into account when finalising the plan for publication.

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"> • An outline of the contents of the draft Local Plan is set out in Chapter 3. • The vision and objectives of the plan are outlined in Chapter 3. • 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.
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"> • 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. • 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.
c) The environmental characteristics of the areas likely to be significantly affected	<ul style="list-style-type: none"> • This is covered in Appendix 2 of the Scoping Report which identifies the key baseline information for the borough. • The baseline characteristics of the borough are also contained in chapter 4 of the SA report.
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"> • A Habitats Regulation Assessment screening has been carried out which concluded that the draft Local Plan are unlikely to have significant effects on sites of European importance for habitats or species, or an adverse impact on the integrity of those sites.
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"> • These are set out in Appendix 1 of the SA Scoping Report, see also chapter 4 of the SA report which briefly outlines how these have been considered in the preparation of the draft Local Plan.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage,	<ul style="list-style-type: none"> • These issues are all covered in the 16 sustainability objectives against which all of the allocated sites have been assessed the main Report.

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"> • Mitigation measures are referred in the main Report.
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"> • Chapters 6 and 7 and Appendix C of this SA report detail how the options were developed and considered while the gaps and difficulties in obtaining some baseline data was explained in chapter 5 of the SA Scoping Report.
i) A description of measures envisaged concerning monitoring	<ul style="list-style-type: none"> • Proposed monitoring measures are summarised in chapter 9 of this SA Report.
j) a non-technical summary of the information provided under the above headings	<ul style="list-style-type: none"> • A non-technical summary is provided at the opening of this SA Report.

Appendix B

SA Objectives and criteria

No.	Objective	Criteria
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> a) Will the Local Plan increase the supply of housing b) Will the Local Plan protect and promote affordable housing development c) Will the Local Plan provide housing for people, particularly families, on moderate and lower incomes? d) Will the Local Plan encourage development at an appropriate density, standard, size and mix? e) Will the Local Plan provide everybody with the opportunity to live in a better home?
2	To promote a healthy and safe community	<ul style="list-style-type: none"> a) Will the Local Plan promote healthy living through e.g. provision of walking, cycling and recreation facilities? b) Will the Local Plan help to promote safety and reduce levels of crime, anti-social behaviour and fear of crime? c) Will the Local Plan encourage improved provision of healthcare facilities in areas of need?
3	To ensure access to local shopping, community, leisure facilities and open space	<ul style="list-style-type: none"> a) Will the Local Plan encourage mixed-use development? b) Will the Local Plan encourage the retention and development of key services (e.g. shopping, community and leisure facilities)? c) Will the Local Plan encourage the location of services in proximity to public transport or increase access to services by public transport? d) Will the Local Plan help to protect, increase/improve open space?
4	To tackle poverty and social exclusion and promote equal opportunities	<ul style="list-style-type: none"> a) Will the Local Plan encourage development that facilitates social cohesion and be beneficial to disadvantaged groups? b) Will the Local Plan provide for equality of access for all to buildings and services? c) Will the Local Plan encourage development opportunities in those areas in need of economic development?
5	To encourage and accommodate sustainable economic growth and employment opportunity	<ul style="list-style-type: none"> a) Will the Local Plan encourage the retention and growth of existing, locally based industries? b) Will the Local Plan accommodate new and expanding businesses? c) Will the Local Plan encourage new investment in the local economy and promote development opportunities for employment? d) Will the Local Plan focus growth in growth areas, Central London and in town centres?
6	To maximise the benefits of regeneration and	<ul style="list-style-type: none"> a) Will the Local Plan encourage investment that will promote social well-being and benefit the economy?

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

No.	Objective	Criteria
	possible.	biodiversity and open space in the borough? c) Will the Local Plan encourage the creation of new habitats, including through the provision of additional open space and green roofs? d) Will the Local Plan protect and provide for the protection and planting of more trees in the borough?
13	To reduce the amount of waste requiring final disposal	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 ₂ 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

Issue: Affordable housing sliding scale

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

In 2008, it is estimated that the need for additional affordable homes (including a steady reduction in the existing backlog) was 4,876 per annum. The gross existing (backlog) need was estimated as 6,759 homes, equivalent to 7% of all Camden's households. On the basis of a "balanced housing market" model, the 2008 study estimated that affordable home requirements were 314 homes or 52.8% of the (then) annual housing monitoring target of 595 additional homes per year.

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.

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 m² gross additional floorspace), but for smaller schemes the sliding scale applies - 10% for 10 additional homes (or 1000m² gross of additional floorspace), 20% for 20 homes/ 2000m², 35% for 35 homes/3500m² etc.

Alternative options

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 (e.g. sliding scale applies from 10 to 30 additional homes)
- 3: Set a flat affordable housing percentage target regardless of scheme size i.e. no sliding scale

Summary of assessment findings

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 also likely to have minor positive impacts on objectives relating to housing, poverty (social exclusion) sustainable communities and vacant land (efficient development density).

Option 2 seeks to retain a sliding scale but with higher affordable housing targets than currently for smaller schemes. It is likely to provide more affordable housing, but there is some risk that it would fail 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.

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 (well-being 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 alternative options appraisal

The preferred approach is Option 2, subject to financial viability appraisal indicating that Option 2 is the most practical option for maximising affordable housing delivery without reducing the number of homes on small sites and the overall housing delivery.

Issue: Affordable housing sliding scale	Options			
Appraisal findings	SA Objectives	1	2	3
<p>Option 1 Retain existing approach (i.e. sliding scale applies from 10 to 50 additional homes)</p> <p>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 well-being and housing to meet local needs, and a minor positive impact on vacant land by maintaining development density.</p> <p><i>Duration (short, medium, long-term): short-term and continuing, maintaining the current position should help to maintain housing and affordable housing outputs</i></p> <p><i>Geographic scale: borough wide</i></p> <p><i>Temporary/permanent: positive impacts should be permanent</i></p> <p><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></p> <p>Option 2 Retain a sliding scale but condensed so that the maximum target applies to smaller schemes.</p> <p>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 well-being 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).</p> <p><i>Duration (short, medium, long-term): medium to long-term, the market will take some time to adapt and deliver any additional affordable housing</i></p> <p><i>Geographic scale: borough wide</i></p>	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	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

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 well-being 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

Issue: Affordable housing tenureOutline reasons for focusing appraisal on this policy issue / set of alternatives

The existing 60-40 (social affordable/intermediate split is consistent with the London Plan, and reflects the finding of the 2008 Housing Needs Survey update that 75% of those in need of affordable housing could afford to pay higher than social rents. 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).

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.

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.

Alternative options

- 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;

Summary of assessment findings

Option 1 would be likely to have a minor positive impact on objectives relating provision of housing/ affordable housing and poverty (social inclusion).

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).

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.

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 alternative options appraisal

The preferred approach is to progress Option 1, subject to what is shown by the financial viability appraisal of the plan. 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.

Issue: Affordable housing tenure	Options		
	1	2	3
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.			
Appraisal findings (likely significant effects)			
Option 1: 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>			
Option 2: 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 would adapt, but yes for poverty/ social exclusion as social-affordable rented homes can relieve pressure and improve conditions in the existing stock and</i>			
	SA Objectives		
	1 Housing	+	-
	2 Healthy communities	0	0
	3 Community facilities	0	0
	4 Poverty	+	++
	5 Economic growth	0	-
	6 Sustainable communities	0	0
	7 Urban design	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

if retained can help a 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).

Issue: Houses in Multiple Occupation (bedsits/ bedrooms with shared facilities)Outline reasons for focusing appraisal on this policy issue / set of alternatives

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 homes in Use Class C3. Consequently there is less scope to protect HMOs through planning policy than when the current policy (DP9) was drafted.

There are indications that the number of HMOs has declined since the 2004 Camden Private House Condition Survey, and the Permitted Development right could accelerate the decline. 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.

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

Alternative options

- 1: Continue to protect existing HMOs
- 2: Allow HMOs to be converted to self-contained housing

Summary of assessment findings

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.

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 alternative options appraisal

The preferred approach is to progress Option 1 as it has positive impacts on housing and poverty objectives, and has no negative impacts on SA objectives.

Issue: Houses in Multiple Occupation (HMOs)	Options	
	1	2
Appraisal findings (likely significant effects)		
Option 1: 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>		
Option 2: 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>		
	SA Objectives	
	1 Housing	+
	2 Healthy communities	0
	3 Community facilities	0
	4 Poverty	+
	5 Economic growth	0
	6 Sustainable communities	0
	7 Urban design	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

Issue: Mix of house sizesOutline reasons for focusing appraisal on this policy issue / set of alternatives

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. Emerging housing needs evidence indicates that a priority for 3-bed homes could be more appropriate in the future.

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.

Alternative options

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.

Summary of assessment findings

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

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. There would also be a minor positive impact on efficient use of land and buildings (vacant land).

Outline reasons for selecting preferred approach in light of alternative options appraisal

The preferred approach 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 and 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.

Issue: Mix of house sizes	Options	
	1	2
Appraisal findings (likely significant effects)		
Option 1: Continue to seek a mix of large and small homes in developments, but to provide greater flexibility		
Option 1 would be likely to have a minor positive impact on objectives relating to housing, poverty (social cohesion) and sustainable communities (local people) as it would provide housing sizes to meet a the specific range of needs identified in our evidence base and ensure that there are family homes available in the market sector as well as the affordable sector.		
<i>Duration (short, medium, long-term): short-term and continuing</i>		
<i>Geographic scale: borough-wide</i>		
<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>		
<i>Cumulative effects: no</i>		
Option 2: Allow the market to operate freely to respond to demand for market homes of different sizes and specify affordable housing priorities only		
Option 2 would be likely to have a minor negative impact on objectives relating to housing, poverty (social cohesion) and sustainable communities (local people) as it would allow market provision focussed on very small households and/ or aimed primarily at investors who do not intend to live in the borough. Option 2 would have a minor positive impact on efficient use of land and buildings (vacant land) as it would allow market developers to return vacant properties to constraints use without constraints on the size of homes.		
<i>Duration (short, medium, long-term): short-term and continuing</i>		
<i>Geographic scale: borough-wide, possibly with particular impacts in Central London and other highly accessible locations where there is the greatest interest in small homes at high density and investment properties</i>		
SA Objectives		
1 Housing	+	-
2 Healthy communities	0	0
3 Community facilities	0	0
4 Poverty	+	-
5 Economic growth	0	0
6 Sustainable communities	+	-
7 Urban design	0	0
8 Vacant land	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

<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

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

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.

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.

Alternative options

- 1: Prioritise self-contained housing
- 2: Prioritise all housing, including student housing

Summary of assessment findings

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.

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.

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 alternative options appraisal

The preferred approach 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.

<p>Issue: Housing as priority use</p> <p>Appraisal findings (likely significant effects)</p> <p>Option 1: prioritise self-contained housing</p> <p>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.</p> <p>Both options would have a minor negative impact on the employment growth objective by prioritising housing rather than business.</p> <p><i>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</i></p> <p><i>Geographic scale: Borough-wide, possibly with more impact in Central London as a favoured location for student housing</i></p> <p><i>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</i></p> <p><i>Cumulative effects: no</i></p> <p>Option 2: prioritise all housing, including student housing</p> <p>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</p>	<table border="1"> <thead> <tr> <th></th> <th colspan="2">Options</th> </tr> <tr> <th>SA Objectives</th> <th>1</th> <th>2</th> </tr> </thead> <tbody> <tr> <td>1 Housing</td> <td>++</td> <td>+</td> </tr> <tr> <td>2 Healthy communities</td> <td>0</td> <td>0</td> </tr> <tr> <td>3 Community facilities</td> <td>0</td> <td>0</td> </tr> <tr> <td>4 Poverty</td> <td>+</td> <td>+</td> </tr> <tr> <td>5 Economic growth</td> <td>-</td> <td>-</td> </tr> <tr> <td>6 Sustainable communities</td> <td>+</td> <td>-</td> </tr> <tr> <td>7 Urban design</td> <td>0</td> <td>0</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>0</td> <td>0</td> </tr> <tr> <td>12 Biodiversity</td> <td>0</td> <td>0</td> </tr> <tr> <td>13 Waste</td> <td>0</td> <td>0</td> </tr> <tr> <td>14 Air quality</td> <td>0</td> <td>0</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>		Options		SA Objectives	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	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
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relating to reduced reliance on private transport (access to public transport), 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 housingOutline reasons for focusing appraisal on this policy issue / set of alternatives

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.

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.

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.

Alternative options

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

Summary of assessment findings

Option 1A and 1B

Option 1A would potentially have positive impacts on housing and sustainable communities by securing housing available to wide range of people including local people, whereas Option 1B would have negative ones. However Option 1A would potentially have a negative impact on economic growth objectives for the higher education sector where Option 1B would have a positive impact.

Option 2A and 2B

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 in the higher education while Option 2B could have negative impacts by allowing a loss of housing for students.

Outline reasons for selecting preferred approach in light of alternative options appraisal

The preferred approach 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.

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	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

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

Paragraph 21 of the NPPF states that LPA's should "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"

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 will seek to introduce an Article 4 Direction in certain geographic areas in the borough.

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

Alternative options

- 1: The current approach is to retain land and buildings suitable for continuous business use.
- 2: Allowing 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.

Summary of assessment findings

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).

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.

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.

Outline reasons for selecting preferred approach in light of alternative options appraisal

The preferred approach 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.

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	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

Geographic scale: Borough

Temporary/permanent: permanent

Cumulative effects? Yes. Positive cumulative economic benefits as well as responding to current and future business needs.

Issue: Industrial areasOutline reasons for focusing appraisal on this policy issue / set of alternatives

Camden has one of the lowest stocks of industrial and warehousing space in London. One major 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.

According to the latest Employment Land Study 2014 there is a low vacancy level in the Industry Area 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.

Current approach is to protect the borough's main Industry Area from non-industrial/warehousing uses.

Alternative options

1: Continue to protect the Kentish Town Industrial Area

2: Intensify uses within the Industrial Area whilst introducing other uses such as housing and offices.

Summary of assessment findings

Option 1 could have a 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.

Outline reasons for selecting preferred approach in light of alternative options appraisal

The preferred approach is to progress Option 2 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 whilst making the most efficient use of the Camden's limited land in order to support Camden's growth.

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 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	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

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

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.

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.

Alternative options

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.

Summary of assessment findings

The main impact of the assessment centres on 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 by: protecting the character and amenity of areas including conservation areas; will stop unsightly proliferations of signage, will reduce street clutter; and prevent 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 alternative options appraisal

The preferred approach is Option 1, as 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.

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	++	- -
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

Basements

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

There is ongoing concern about basement development from local groups 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.

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.

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 through diminishing the vegetation and character of gardens by building underneath them.

Alternative options

3. Minor adjustments to policy without making prescriptive limits on depth or extent
4. Restrict basement development of more than one storey depth and to more than 50% of the garden area

Summary of assessment findings

All basement development has an effect on the ground and water conditions. Cumulative effects are difficult to assess. More prescriptive limits would have a 'precautionary principle' effect and are through preventing development are likely to have a positive effect on water and soil conditions. Basement development in the borough is usually for ancillary residential space (pools, gyms, storage, entertainment) and does not contribute to housing supply.

Option 1. 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. Option 2. In addition to the water benefits of Option 1, Option 2 is likely to have some minor positive effects on biodiversity and amenity values by further restricting basements extending underneath gardens. There are also likely to be 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 alternative options appraisal

The preferred approach is Option 2, as it achieves benefits in terms of amenity, water, biodiversity, and waste.

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

Option 1: Minor adjustments to policy without making arbitrary limits on depth or extent

Commentary paragraph

This option will ensure that basement development does not harm the amenity or structural ground or water conditions of the area, or cause damage to neighbouring properties as evidenced by the applicant to the satisfaction of the Council.

Basements will be long term to permanent in effect. Policies will apply borough wide.

Option 2: Restrict basement development of more than one storey depth and to more than 50% of the garden area

Commentary paragraph

This option would further restrict the basement development, limiting the size of a small number of basements which otherwise do not affect amenity, or structural, ground water conditions, or damage to neighbouring properties.

The amenity and biodiversity benefits in this option would come from restricting basement development under garden land, and therefore projecting trees and gardens.

Basements will be long term to permanent in effect. Policies will apply borough wide.

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

Issue: Local Green Space

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

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.

Alternative options

1. Promote the principle of designating Local Green Space
2. Identify specific areas as Local Green Space in the Local Plan

Summary of assessment findings

Option 1, encourages communities to take the lead in identifying local green spaces. 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.

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.

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 alternative options appraisal

Local green spaces are a powerful expression of local communities aspirations. The Council would not seek to identify these spaces. The preferred approach is to progress Option 1.

Issue: Local Green Space	Options		
<p>Appraisal findings (likely significant effects) Option 1: Promote the principle of designating Local Green Space Commentary paragraph –</p> <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>Same as quiet areas – impact would be more immediate if we designate space now.</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>	SA Objectives	1	2
	1 Housing	-	-
	2 Healthy communities	+	+
	3 Community facilities	+	+
	4 Poverty	0	0
	5 Economic growth	0	0
	6 Sustainable communities	0	0
	7 Urban design	+	+
	8 Vacant land	0	0
	9 Transport	0	0
	10 Amenity	0	0
	11 Water	0	0
	12 Biodiversity	+	+
	13 Waste	0	0
	14 Air quality	+	+
	15 Energy	0	0
	16 Non-renewable resources	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

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

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 of our Open Space, Sport and Recreation Study.

Alternative options

3. Maintain existing public open space provision standards of 9m² per person?
4. Increase our public open space targets to 13m² per person as recommended by Atkins for residential?

Summary of assessment findings

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 underprovision 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.

Option 2 proposes an increase to the open space standard. While this may appear desirable in terms of generating a higher requirement for 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).

The Council will potentially use the Community Infrastructure Levy (to be introduced in 2015) to fund strategic improvements to open spaces, e.g. Park Improvement 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 alternative options appraisal

In consideration with the above the Council will progress option 1. While 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.

Issue: Public Open Space	Options		
<p>Appraisal findings (likely significant effects)</p> <p>Option 1: Maintain existing public open space provision standards of 9m² 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 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>Option 2: Increase our public open space targets to 13m² 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>	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	+	+
	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

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.

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.

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

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

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.

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).

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.

Evidence: Transport Strategy 2011, Census 2011.

Alternative options

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

Summary of assessment findings

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 means 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.

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 alternative options appraisal

Option 1 (Introduce car-free across the whole of the borough) is preferred to Option 2 (Introduce car-free housing for additional parts of the borough and car-capped housing for areas with lower PTAL ratings). 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 however would further the existing harm caused by car use, yet only benefit a relatively small number of residents.

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	++	+
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

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

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 are no longer economically viable. However this approach has meant that we have been most successful in protecting pubs that have a community facility, such as space for evening classes, clubs, meetings etc even though these pubs have shown to be important to the local community. 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.

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.

Alternative options

- 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

Summary of assessment findings

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. (desirability of converting – suitable for families – quality of accommodation provided)

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.

Outline reasons for selecting preferred approach in light of alternative options appraisal

Option 1 and 2 are fairly similar although the positive effects of option 2 on the provision of community facilities and development that facilitates social cohesion. There would also likely be quite minor positive effects on economic growth whereby the presence of a pub likely supports and stimulates growth of other night-time economies such as restaurants. The preferred approach therefore is to progress option 2.

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.

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	+	+
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

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

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 (7% overall) when compared to the London and the UK.

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.

Option 3 is a mixed approach, maintaining the stock of A1 shops premises in primary frontages (as with Alternative 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).

Alternative options

1. Maintain high proportion of A1 shops & maintain low proportions of A3, A4, A5 uses
2. Allow shift of proportion of A1 shops down & allow shift to higher proportions of A3, A4, A5 uses
3. Maintain high proportion of A1 shops on primary frontages & allow shift to higher proportions of A3, A4, A5 uses on secondary frontages

Summary of assessment findings

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.

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.

The mixed approach of Option 3 offers the greatest benefits as 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 alternative options appraisal

Preferred approach 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.

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	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

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	+	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/-	0/+

15 Energy	0	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	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	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 well-being

C1 Improving and promoting Camden's health and well-being

C2 Community facilities and leisure

C3 Pubs

C4 Safety and security

	Community and health policies			
SA Objectives	C1	C2	C3	C4
1 Housing	0/+	0	0	0
2 Healthy communities	++	++	0	++
3 Community facilities	+	++	+	0
4 Poverty	+	+?	++	+
5 Economic growth	0	+	+	0
6 Sustainable communities	0	++	+	0
7 Urban design	+	0	++?	+
8 Vacant land	0	+	+	0
9 Transport	+	+	0	0
10 Amenity	+?	0	0	0
11 Water	0	0	0	0

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

Design and heritage

D1 Design

D2 Heritage and conservation

D3 Shopfronts

D4 Advertisements

A5 Basements and lightwells

C5 Access

	Design and heritage policies					
SA Objectives	D1 Design	D2 Heritage and conservation	D3 Shopfronts	D4 Advertisements	A5 Basements and lightwells	C5 Access
1 Housing	+	-	0	0	0	+
2 Healthy communities	+	0	+	0	0	0

3 Community facilities	0	0	0	0	0	0
4 Poverty	0	0	0	0	0	++
5 Economic growth	0	0	0	0	0	0
6 Sustainable communities	0	0	0	0	0	+
7 Urban design	++	+	++	+	+	0
8 Vacant land	0	-	0	0	0	0
9 Transport	0	0	0	0	0	+
10 Amenity	0	0	0	0	0	+
11 Water	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

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	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	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	+	+	+	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	-/++	-/++	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

SA Objectives	Amenity policies	
	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	+	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
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Open space and biodiversity

A5 Provision, Protection and Enhancement of our Open spaces

A3 Biodiversity and trees

	Open space and biodiversity policies	
SA Objectives	A5	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	+	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

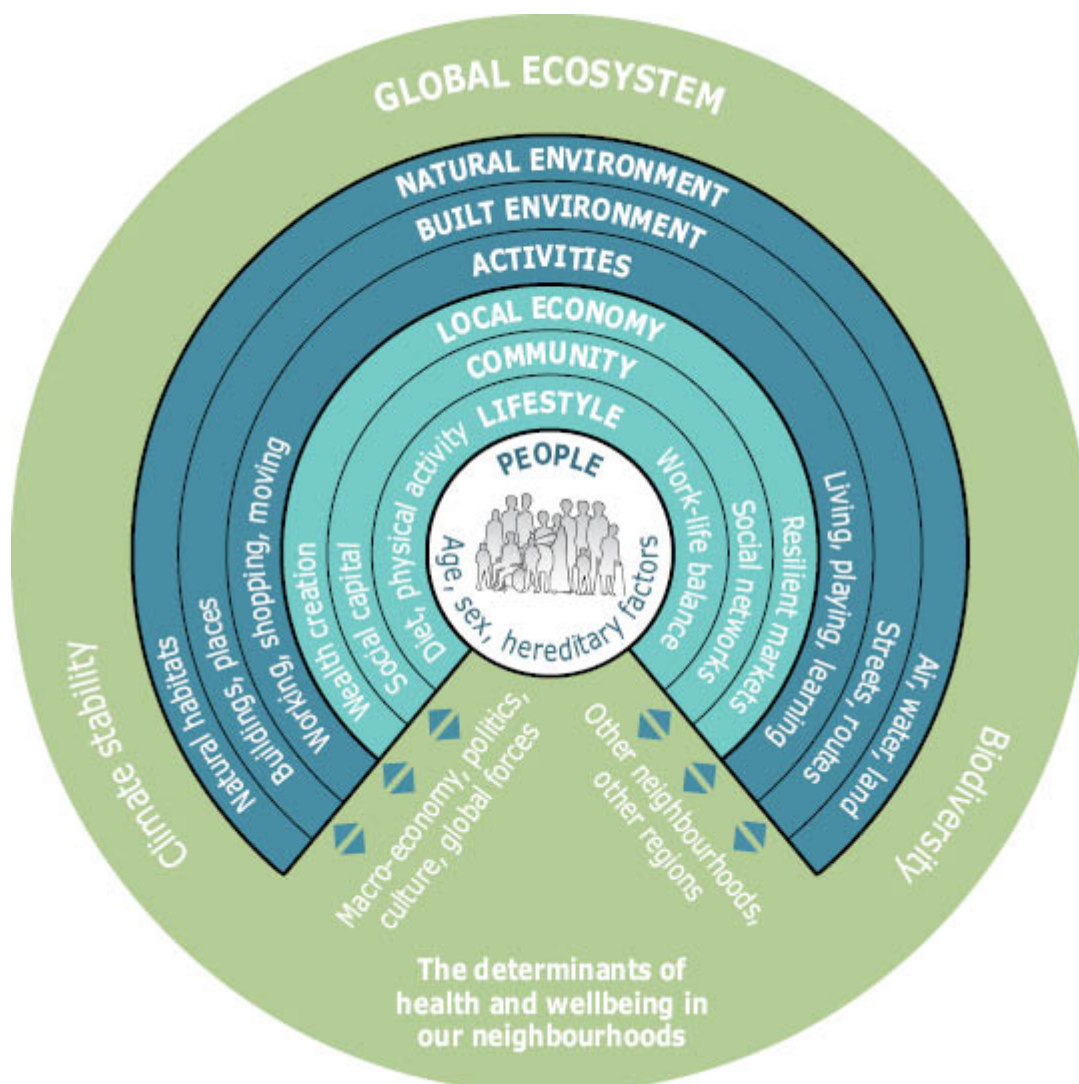
Health Impact Assessment

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).

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 well-being. 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 CH1 and CH2 will have major positive effects on promoting a healthy and safe community and access to community and leisure facilities. CH1 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 well-being throughout the plan document. The benefits of policy CH1 could be further improved by highlighting areas of need for healthcare facilities. Policy CH2 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 CH2 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 CH1. 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 S1 and S2 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 well-being.
- 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 well-being 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 A5 – 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).

Sustainability Appraisal of Camden's Local Plan

Scoping Report Update

February 2016

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1.0 Introduction

This document is the Scoping Report for the Sustainability Appraisal (SA) of Camden's Local Plan. An SA of the Local Development Framework was produced relatively recently in 2010. In consideration of the National Planning Policy Framework 2012 and changing local circumstances, the plan is under review. The Scoping Report forms an early stage in this process.

This scoping report provides updates to relevant plans, policies and programmes, the baseline and key sustainability issues which, in hand, develops sustainability objectives and criteria.

The Local Plan will set out the boroughs vision, strategy and objectives for development in the borough. 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 plan focuses on five strategic objectives which will be reflected in the preparation and development of the Local Plan, these are:

- i) Providing democratic and strategic leadership fit for changing times;
- ii) Developing new solutions with partners to reduce inequality;
- iii) Creating conditions for and harnessing the benefits of economic growth;
- iv) Investing in our communities to ensure sustainable neighbourhoods; and
- v) Delivering value for money services by getting it 'right first time'.

This scoping report explains:

- Why a sustainability appraisal of these documents is required;
- The policies, plans and programmes relevant to them;
- The baseline information for the various indicators used to appraise the DPDs;
- The sustainability appraisal process and requirements; and
- How the information obtained is taken forward in the SA and the Local Plan.

The UK Government (through the Environmental Assessment of Plans and Programmes Regulations 2004) requires the contents of the scoping report to be consulted on with the following agencies:

- The Environment Agency
- Natural England
- English Heritage

We are now at the stage where we wish to obtain the views of these agencies, as well as other interested organisations and parties, on this scoping report. Consultation at this stage will help to make sure that the SA will be comprehensive and robust and meet statutory requirements. Questions on which interested parties' comments are sought are included at the end of this report.

2.0 Why is a Sustainability Appraisal required?

Legal Requirements

Under the *Planning and Compulsory Purchase Act 2004* sustainability appraisal is mandatory for any Local Plan.

The National Planning Policy Framework states that Sustainability Appraisal should be an integral part of the plan preparation process. The *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents 2005* by the ODPM (Office of the Deputy Prime Minister) provide guidance for Local Planning Authorities that need to undertake an SA. This scoping report and the subsequent SA will be produced in accordance with that guidance.

In addition, when preparing a Local Plan local planning authorities will also be required to carry out an environmental assessment, known as a Strategic Environmental Assessment (SEA). This requirement comes from European Directive 2001/42/EC (the SEA Directive) and has been enacted in the UK by a separate piece of legislation: the *Environmental Assessment of Plans and Programmes Regulations 2004* (the SEA Regulations). Whilst the SA guidance produced by the ODPM provides information to assist compliance with the SEA Directive, a separate guidance note for the production of SEA is set out in *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM et al, 2005).

This scoping report is therefore intended to meet both the requirements under the Planning and Compulsory Purchase Act 2004 and the SEA Regulations. It should be noted that SA is broader in terms of its scope and evaluation of potential impacts than an SEA, which is limited to environmental impacts. The use of the term SA throughout this document also encompasses any relevant requirements of an SEA.

Government Guidance on Sustainability Appraisal

Planning Practice Guidance on Sustainability Appraisal (SA) states “A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives.” (2013)

The guidance goes further to note that the process is an opportunity to consider options in which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. A sustainability appraisal of new or revised Local Plans is required by section 19 of the Planning and Compulsory Purchase Act 2004.

Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, which implement the requirements of the European Union Directive 2001/42/EC (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment.

The main purpose of the SA is to ensure that a plan or policy will have been effectively appraised for its sustainability impact.

The SA will necessarily have to be confined to assessing the significant sustainability effects (both positive and negative) of the Local Plan. Government guidance confirms that it is not

necessary for a SA to validate the sustainability effects of national, regional or other local plans, policies or programmes.

This scoping report proposes a framework against which the Local Plan can be assessed. It is based on the 2008 SA Scoping Report for the Camden's Local Development Framework and has been informed by an update of the policy context and baseline indicators to reflect changes in policy and baseline information. The sustainability impact of the Local Plan will then be assessed against these objectives (the Sustainability Appraisal Framework) in the next stages of the SA process.

3.0 The sustainability appraisal process

The production of SA comprises five main stages (A-E). The process of producing the Local Plan will take place in three main stages (1-3), set out below.

Table 1: SA and Local plan preparation process

SA Process		Local Plan process	
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope	Pre-production: review of the Local Plan, consultation and evidence gathering	Stage 1
Stage B	Developing and refining options and assessing effects	Production and consultation	Stage 2
Stage C	Preparing the SA Report		
Stage D	Consulting on the draft DPDs and the SA report		
		Adoption	Stage 3
Stage E	Monitoring the significant effects of implementing the DPDs		

This scoping report forms the first stage (Stage A) of the SA of the proposed Local Plan and will look to identify the broad sustainability effects of the Local Plan and the approach and level of detail appropriate for the SA, which will accompany the draft Local Plan when it is ready for consultation.

One of the outcomes of the scoping report will be a proposed Sustainability Appraisal Framework. The Framework will consist of a set of draft sustainability objectives and criteria against which the objectives of the Local Plan can be compared to assess compatibility and inconsistencies. These in turn will go on to provide the structure and scope of the final draft SA, which will be consulted upon along with the draft Local Plan.

The Scoping Report

This report comprises *Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope*, and consists of the following tasks:

- **A1:** Identifying other relevant policies, plans and programmes, and sustainable development objectives.
- **A2:** Collecting relevant social, environmental and economic baseline information.
- **A3:** Identifying key sustainability issues for the SA/DPDs to address.
- **A4:** Developing the SA framework consisting of SA objectives and indicators.
- **A5:** Consulting relevant authorities on the scope of the SA.

The aim is to ensure that the SA is as comprehensive as possible and addresses the most relevant issues. A further key aim is to enable input from key consultees at an early stage in the process. This report therefore follows each of the above stages (A1-A5) in turn.

STAGE A1: Identifying other relevant policies, plans and programmes, and sustainable development objectives

The SA must take into account the relationships between the Local Plan and other relevant policies, plans, programmes and sustainability objectives. This section presents an overview of existing plans, programmes, policies and sustainability objectives that are considered to be of most relevance to the Local Plan.

In addition, the SEA Directive specifically requires environmental protection objectives established at international, European Community or national levels to be taken into account. The Environmental Report should provide information on:

- The relationship [of the plan or programme] with other relevant plans and programmes; and
- The environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation" (Directive Annex I a and e).

Other relevant documents identified in Government guidance include the UK Sustainable Development Strategy, the National Planning Policy Framework (NPPF), and a range of other plans and strategies at regional and local levels. All of these could influence the sustainability issues to be considered in the preparation of the Local Plan.

Government guidance indicates that this process will help to:

- identify any external social, environmental or economic objectives that should be taken into account in the SA of the Local Plan;
- identify other external factors, including sustainability issues that might influence the preparation of the Local Plan; and
- determine whether other policies, plans and programmes might give rise to cumulative effects when combined with the Local Plan that is subject to the SA.

Identifying and reviewing these documents is an important element of the SA and SEA process, as it can help to shape the objectives against which the Local Plan should be appraised, as well as indicating any particular issues and problems that need to be addressed. Potential synergies, inconsistencies and constraints can also be identified.

A review of relevant policies, plans and programmes has been carried out as part of this stage of the SA process. The objectives and requirements of international and European strategies and Directives are now sufficiently well established to have translated down into existing and emerging national, regional and local programmes, plans and policies. Their influence will be strongly felt in the consideration of these lower tiered documents, so it is considered appropriate in this SA to focus on their key messages before reviewing other documents in greater detail.

Table 2 below indicates international and European strategies and Directives that will have been taken into account. Links to the sources of these documents are provided.

Further assessment relates only to those national, regional and local strategies, plans and programmes which have been considered to have most relevance to the proposed Local Plan. It has proceeded on the presumption that sustainability policy and objectives of higher order plans are now sufficiently embedded within them.

Table 3 below provides a summary list of the national, regional and local strategies, programmes, plans and policies that have been reviewed. Links to the sources of these documents are also provided.

Finally, a full assessment of relevant documents has been undertaken to identify the relevant objectives and targets from the plans reviewed and their potential implications for the sustainability appraisal objectives and the Local Plan. This is included in **Appendix 1**.

Table 2: Key Messages from International and European Strategies and Directives

International Plans/Programmes	Document Location:	Key Messages Relevant to Other Plans and Programmes:
International:		
Johannesburg C40 Cities Climate Leadership Group Mayors Summit 2014	http://c40summitjohannesburg.org/	The theme of the 2014 C40 Cities Mayors Summit is: "Towards resilient and liveable Megacities– demonstrating action, impact and opportunity". The key issues were Adaptable and Resilient Cities; Building Liveable Cities; and Socio-Economic Development of emerging megacities." The C40 will be releasing the 2nd volume of its global report "Climate Action in Megacities".
The UN Millennium Declaration and Millennium Development Goals (2000)	http://www.un.org/millenniumgoals/	Goal 7: Ensure environmental sustainability and integrate the principles of sustainable development into country policies and programmes and reverse the loss of environmental resources.
UN Framework Convention on Climate Change (UNFCCC) (1992) and Kyoto Protocol (1997)	http://unfccc.int/essential_background/convention/items/2627.php http://unfccc.int/essential_background/kyoto_protocol/items/2830.php	The UNFCCC sets out to achieve stabilisation of greenhouse gas concentrations in the atmosphere at safe levels. The Kyoto protocol commits the UK to specifically set targets to limit or reduce greenhouse gas emissions. The protocol seeks a total cut in greenhouse-gas emissions of at least 5% from 1990 levels in the commitment period 2008-2012(8% for EU/12.5% for UK)
European Union:		
Initial Directive of 1985 85/337/EEC and amendments codified by 2011/92/EU Assessment of the Effects of certain Public and Private Projects on the Environment	http://ec.europa.eu/environment/eia/eia-legalcontext.htm	Establishes the requirements to undertake Environmental Impact Assessment (EIA) of specified projects likely to have a significant impact on the environment
Renewed EU Sustainable Development Strategy (2006) and 2009 review	http://ec.europa.eu/environment/eussd/	Provides a definition of sustainable development "to meet the needs of the present generation without compromising those of future generations." The

International Plans/Programmes	Document Location:	Key Messages Relevant to Other Plans and Programmes:
		<p>priorities are to: combat climate change; ensure sustainable transport; address threats to public health; manage natural resources more responsibly and stop biodiversity decline; combat poverty and social exclusion; and meet the challenge of an ageing population.</p>
<p>Environment Action Plan to 2020, the 7th EAP that will be guiding European environment policy until 2020</p>	<p>http://ec.europa.eu/environment/newprg/</p>	<p>It identifies three key objectives:</p> <ul style="list-style-type: none"> • to protect, conserve and enhance the Union's natural capital • to turn the Union into a resource-efficient, green, and competitive low-carbon economy • to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing
<p>Directive 1996/62/EC: Air Quality Framework (1996) and Daughter Directives (1999, 2000 & 2002)- New Air Quality Directive 2008/50/EC</p>	<p>http://ec.europa.eu/environment/air/quality/legislation/directive.htm</p>	<p>The Directive set objectives for ambient air pollution and provides a framework for subsequent ("daughter") Directives to set long-term air quality objectives and limit values for various pollutants to be met by various dates between 2001 and 2010. This new (2008) Directive includes the following key elements:</p> <ul style="list-style-type: none"> -that most of existing legislation be merged into a single directive (except for the fourth daughter directive) with no change to existing air quality objectives* -New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target -the possibility to discount natural sources of pollution when assessing compliance against limit values -possibility for time extensions of three years (PM10) or up to five years (NO2, benzene) for complying with limit values, based on conditions and the assessment by the European Commission.
<p>The EU Water Framework Directive (2000/60/EC)</p>	<p>http://ec.europa.eu/environment/water/water-framework/index_en.html</p>	<p>Establishes a comprehensive framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater and promotes more sustainable water management and use.</p>
<p>Directive 2006/118/EC on the protection of groundwater against Pollution and Deterioration</p>	<p>http://europa.eu/legislation_summaries/environment/water_protection_management/128139_en.htm</p>	<p>This Directive is designed to prevent and combat groundwater pollution. Its provisions include:</p> <ul style="list-style-type: none"> •criteria for assessing the chemical status of groundwater;

International Plans/Programmes	Document Location:	Key Messages Relevant to Other Plans and Programmes:
		<ul style="list-style-type: none"> •criteria for identifying significant and sustained upward trends in groundwater pollution levels, and for defining starting points for reversing these trends; •preventing and limiting indirect discharges (after percolation through soil or subsoil) of pollutants into groundwater.
Directive 2008/98/EC on Waste (The Waste Framework Directive)	http://ec.europa.eu/environment/waste/framework/	This sets the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. The Directive lays down some basic waste management principles: it requires that waste be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest. Waste legislation and policy of the EU Member States shall apply as a priority order the waste management hierarchy.
Directive 2001/77/EC: Electricity Production from Renewable Energy Sources (2001) - Directive 2009/28/EC: Promotion of the use of energy from renewable sources	http://europa.eu/legislation_summaries/energy/renewable_energy/en0009_en.htm	The 2001 Directive sets a target for the EU of producing 22% of its overall electricity use from renewable energy sources by 2010 with each Member State having its own target (UK: 10%). The 2009 Directive establishes a common framework for the use of energy from renewable sources in order to limit greenhouse gas emissions and to promote cleaner transport. To this end, national action plans are defined, as are procedures for the use of biofuels.
Directive 2002/49/EC: Environmental Noise	http://ec.europa.eu/environment/noise/directive.htm	The Directive places requirements on Member States to assess and manage environmental noise from various sources, including roads and railways. Action plans will have to be drawn up to manage noise issues and effects including noise reduction.
EU Habitats Directive (92/43/EC)	http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm	Member States must take all necessary measures to guarantee the conservation of habitats in special areas of conservation, and to avoid their deterioration.
European Union Biodiversity Strategy to 2020	http://ec.europa.eu/environment/nature/biodiversity/comm2006/2020.htm	There are six main targets, and 20 actions to help Europe reach its goal. Biodiversity loss is an enormous challenge in the EU, with around one in four species currently threatened with extinction and 88% of fish stocks over-

International Plans/Programmes	Document Location:	Key Messages Relevant to Other Plans and Programmes:
		<p>exploited or significantly depleted.</p> <p>The six targets cover: Full implementation of EU nature legislation to protect biodiversity Better protection for ecosystems, and more use of green infrastructure More sustainable agriculture and forestry Better management of fish stocks Tighter controls on invasive alien species A bigger EU contribution to averting global biodiversity loss.</p>
EU Birds Directive (79/409/EC) - The Birds Directive 2009/147/EC codified version of Directive 79/409/EEC as amended	http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm	The directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds.

Table 3: National, Regional and Local Strategies, Programmes, Plans and Policies (see Appendix 1 for more detailed information)

Ref No	Document Title and link
National	
1.	National Planning Policy Framework 2012 Planning Practice Guidance superseded – PPSs & PPGs.
2.	The UK Sustainable Development Strategy: Securing the Future (UK Govt 2005)
3.	Sustainable Communities: Building for the Future (ODPM 2003)
4.	Sustainable Communities in London: Building for the Future (ODPM 2003)
5.	The Code for Sustainable Homes: Setting the standard in sustainability for new homes (DCLG February 2008)
6.	The Code of Sustainable Homes: Technical Guide – 2010
7.	The National Adaption Programme, 2013
8.	Climate Change: The UK Programme 2006 (UK Govt 2006)
9.	Transport White Paper-The Future of Transport: A Network for 2030 (DoT 2004)

Ref No	Document Title and link
10.	Cutting carbon, creating growth: making sustainable local transport happen – white paper January 2011
11.	National Air Quality Strategy for England; Wales; Scotland and Northern Ireland: Working Together for Clean Air (DEFRA 2000 and updated 2003) The air quality strategy for England, Scotland, Wales and Northern Ireland (Volume 1, 2007; Volume 2, 2011)
12.	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
13.	Building a Greener Future – Towards Zero Carbon Development, 2006
14.	Waste Management Plan for England July 2013 National Planning Policy for Waste 2014
15.	By Design: Urban Design in the Planning System-Towards Better Practice (ODPM and CABE 2000)
16.	Guidance on Tall Buildings (CABE and English Heritage 2007)
17.	The Changing face of the High Street: Decline and Revival (2013) English Heritage
18.	Historic Environment Good Practice Advice in Planning (Historic England, 2015) Note 1 The Historic Environment in Local Plans Note 2 Decision Taking in the Historic Environment Note 3 The Setting of Heritage Assets
19.	BREEAM Assessment (BRE 2006)
20.	UK Biodiversity Action Plan (1994) Biodiversity 2020: A strategy for England's wildlife and ecosystem services - UK Post 2010 Biodiversity Framework
21.	Working with the Grain of Nature: A Biodiversity Strategy for England (2002)
22.	Fair Society, Healthy Lives, The Marmot Review, 2010
23.	Planning healthier places – report from the reuniting health with planning

Ref No	Document Title and link
	project, TCPA 2013
24.	Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites – Planning policy for traveller sites (2012)
25.	Thames Corridor Abstraction Management Strategy (Environment Agency, June 2004)
26.	The Community Infrastructure Levy Regulations 2010 and amendments 2014
27.	Model Procedures for the Management of Contaminated Land (Contaminated Land Report 11) (Environment Agency, September 2004)
28.	Thames Region Catchment Flood Management Plan (consultation document, Environment Agency, January 2007)
29.	Environment Agency River Basin Management Plan, Thames River Basin District (2009)
30.	Sustainable Drainage Systems – An Introduction (Environment Agency, May 2003) + Non-statutory technical standards for sustainable drainage systems, DEFRA 2015
31.	Bringing your rivers back to life – A Strategy for restoring rives in North London (Environment Agency, February 2006)
32.	Understanding place: conservation area designation, appraisal and management (English Heritage March 2011)
33.	Transport and the historic environment (English Heritage, March 2004)
34.	Streets for All London Manual (English Heritage, March 2000)
35.	Regeneration and the historic environment (English Heritage, January 2005)
36.	Retail Development in Historic Areas (English Heritage, December 2005)
37.	Guidance on the Setting of Heritage Assets (2011)
38.	Seeing history in the view 2011
39.	Local Green Infrastructure: Helping communities make the most of their

Ref No	Document Title and link
	landscape, September 2011
London	
40.	The London Plan Spatial Development Strategy for Greater London 2011 – revised early minor alterations 2013
41.	The Mayor's Transport Strategy GLA 2010
42.	Town Centres SPG 2014
43.	Clearing the air: The Mayor's Air Quality Strategy (December 2010)
44.	Connecting with London's Nature: The Mayor's Biodiversity Strategy (2002) All London Green Grid, 2012
45.	Preparing borough tree and woodland strategies, 2013
46.	The Mayor's Economic Development Strategy for London (May 2010)
47.	Green Light to Clean Power: The Mayor's Energy Strategy (2004)
48.	Making business sense of waste: The Mayor's business waste strategy for London (November 2011)
49.	London's wasted resource: The Mayor's municipal waste management strategy
50.	Sunder City: The Mayor's Ambient Noise Strategy (March 2004)
51.	Cultural Metropolis: The Mayor's cultural strategy – 2012 and beyond, 2010
52.	Accessible London: Achieving an inclusive environment, 2014
53.	The Mayor's Housing SPG 2012
54.	The Mayor's Sustainable Design and Construction SPG, 2014
55.	The control of dust and emissions during construction and demolition, 2014
56.	Draft Social Infrastructure SPG, 2014
57.	Land for Industry and Transport, 2012

Ref No	Document Title and link
58.	London Planning Statement, 2014
59.	Shaping neighbourhoods: play and informal recreation, 2012
60.	Shaping neighbourhoods: Character and context, 2014
61.	Geodiversity of London (draft), July 2008
62.	Rapid Health Impact Assessment Tool, Healthy Urban Development Unit, 2013
63.	Planning and Equality and Diversity in London (October 2007)
64.	London View Management Framework SPG (March 2012)
65.	London Boroughs Gypsy and Traveller Accommodation Needs Assessment 2008
66.	The Mayor's Climate Change Mitigation and Energy Strategy 2011
67.	Mayors draft Climate Change Adaptation Strategy (2010)
68.	Crossrail Mayoral CIL, 2012
69.	Better Environment, Better Health. A GLA guide for London's Boroughs, London Borough of Camden 2013
Local	
70.	The Camden Plan 2012 - 2017
71.	Camden Core Strategy, 2010
72.	Camden Development Policies, 2010
73.	Camden Site Allocations, 2013
74.	Camden Planning Guidance
75.	Conservation Area Appraisal and Management Strategies
76.	London Borough of Camden Annual Monitoring Report – 2012/13
77.	Euston Area Plan – submission draft 2014
78.	Bloomsbury - A Strategic Vision (Farrells) 2006
79.	Camden Housing Strategy 2011 – 2016

Ref No	Document Title and link
80.	Camden Housing Need Study Update, 2008
81.	Camden Social Inclusion Strategy (2003)
82.	Tackling Inequality: Camden's Equality Scheme 2005-2008 and Action Plan (LB Camden 2005) & Task force report 2013
83.	Green Action for change – Camden's Sustainability plan 2011 - 2020
84.	Camden Air Quality Action Plan 2013 -2015
85.	Creative and Cultural Industries in Camden, 2009
86.	Camden Transport Strategy (LIP) 2011-2031
87.	Camden's Noise Strategy (2002)
88.	The Camden Biodiversity Action Plan 2013 – 2018
89.	Camden Strategic Flood Risk Assessment, 2014
90.	Camden's Flood Risk Management Strategy 2013
91.	Camden's Surface Water Management Plan, 2011
92.	Preliminary Flood Risk Assessment: Drain London - London Borough of Camden 2011
93.	Building Schools for the Future – Indicative Strategy for Change Part 1 (LBC 2007)
94.	Change for children and families, delivering the Camden Plan 2012
95.	Camden Open Space, Sport and Recreation Study Review; Atkins; 2014
96.	Camden Statement of Licensing Policy 2011
97.	Let's Talk Rubbish – Camden Waste Strategy 2007 - 2010
98.	Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050; SEA-Renue; 2007
99.	Carbon Management Plan 2010 – 2020
100.	Camden Employment Land Review 2008
101.	Camden Employment Land Study, 2014

Ref No	Document Title and link
102.	Camden Retail and Town Centre Study, GVA 2013
103.	Camden Local Economic Assessment 2011
104.	Camden's Joint Strategic Needs Assessment 2013
105.	Infrastructure study update, 2014

STAGE A2: Baseline information

Baseline information can be used to predict and monitor effects and forms a key determinant in identifying the sustainability issues and ways of taking them into account. This section presents an overview of the baseline information that is considered to be of most relevance to the Local Plan.

Most information will be broad and relate to the wider local authority area. There is a great deal of available information and demographic and statistical indicators that could be listed, but as stated in SEA guidance the level of information should be relevant and appropriate to the spatial scale of the plan (The Practical Guide to Strategic Environmental Assessment, 2005).

The baseline topics and issues listed are intended to correlate as closely as possible with indicative SEA Directive and guidance headings of: population and human health, biodiversity, fauna and flora, soil, water, air, climatic factors, material assets and cultural heritage and landscape. There will inevitably be a degree of interrelationship between the issues.

Whilst identifying current baseline data and trends may be relatively straightforward, there will be underlying uncertainty in projecting analysis so far forward on the basis of current information available. Any identified trends will tend to be short to medium term. There may be significant changes to Camden as a whole in the longer term, which cannot be accurately predicted or forecast.

This highlights the need to monitor and review the baseline information periodically after the SA has been completed.

Summary of the baseline

The baseline information has been collected under a number of subtopics, which can be classified as environmental, social or economic. To demonstrate how the SEA topic areas (as set out in Annex 1 of the SEA Directive) have been covered, these are included in brackets beside the relevant SA subtopic as follows:

Environmental

- Transport and traffic (*air, human health, climatic factors*)
- Cultural heritage and landscape (*cultural heritage, landscape*)
- Open space (*landscape, human health*)
- Biodiversity, flora and fauna (*biodiversity, flora and fauna*)
- Air quality (*air, human health, climatic factors*)
- Soil (*soil, human health*)
- Water and flooding (*water, climatic factors*)
- Noise and vibration (*population, human health*)
- Climate factors (*climatic factors*)
- Recycling and waste management (*population, human health, water*)
- Development on previously developed land (*material assets, soil*)

Social

- Population (*population*)
- Health and community (*human health*)
- Deprivation and social exclusion (*population*)
- Education (*population*)
- Housing (*material assets, population*)

- Leisure (*human health*)

Economic

- Town centres and Employment

Under each of these subtopics, a number of baseline indicators have been identified. It is these indicators that have been used to describe the baseline situation and will be used to measure the performance of the Local Plan against the SA objectives. **Table 4** below shows the indicators that describe the various elements of Camden's environment. These have been selected as it was considered that they provided a comprehensive picture of the borough as it is now and would be able to be monitored in the future to measure the progress of the Local Plan in achieving sustainable development.

Table 4: Baseline Indicators

Environmental indicators	
Transport and traffic	<ul style="list-style-type: none"> • Location of major transport demand generating Developments against PTALs (public transport accessibility levels) • % reduction in number of people killed or seriously injured in road accidents • Number of agreements signed for car-free or car capped housing • % Reduction in motor traffic flows through the borough • % increase in proportion of resident trips by walking • % increase in cycling traffic • % Increase in bus traffic
Cultural heritage and Landscape	<ul style="list-style-type: none"> • Conservation areas • Designated and non-designated heritage assets • Heritage at risk • Extent of archaeological priority zones • Number and condition of scheduled ancient Monuments
Open space	<ul style="list-style-type: none"> • Open spaces • Open space deficiency • Area of designated open space /improvements to open space • Public opinion of open spaces in Camden • Number of Tree Preservation Orders (TPOs) served • Number of applications affecting trees protected by TPOs and number of applications permitted that involved the loss of trees protected by TPOs
Biodiversity, flora and fauna	<ul style="list-style-type: none"> • Change in priority species (by type) • Change in priority habitats (by type) • Net loss/gain of Sites of Nature Conservation Importance and other sites of special biodiversity value, such as open spaces • Number of developments that have incorporated green roofs, landscaping or open space to improve biodiversity
Air quality	<ul style="list-style-type: none"> • Carbon dioxide (CO₂), Nitrogen dioxide (NO₂) and particulate matter (PM₁₀) emissions

Soil	<ul style="list-style-type: none"> • Number of sites of potential land contamination
Water and flooding	<ul style="list-style-type: none"> • %/Number of new developments incorporating water conservation measures (e.g. SUDS) • Number of planning permissions granted contrary to the advice of the Environment Agency on flooding, groundwater protection, or water quality • Water use • Number of properties at risk from 1% and 0.1% floods
Noise and vibration	<ul style="list-style-type: none"> • Number of noise complaints received by the Council • Number of important areas 'noise hotspots' defined by Defra
Climate factors	<ul style="list-style-type: none"> • Proportion of energy generated from renewable sources • Domestic energy efficiency • Number of new developments accompanied by a BREEAM assessment • Number of new developments achieving BREEAM ratings of very good or excellent • Number of new developments achieving Code for Sustainable Homes Level 3 and above & Number of new developments accompanied by a BREEAM assessment with ratings of very good or excellent • % Number of new developments incorporating water conservation measures (e.g. SUDS)
Recycling and waste management	<ul style="list-style-type: none"> • % of household waste recycled • % of new developments using sustainable construction
Development on previously developed land	<ul style="list-style-type: none"> • % of new housing on previously developed land
Socio-economic indicators	
Population	<ul style="list-style-type: none"> • Population by age and sex • Population by ethnic group • Population by place of birth • Population growth • Household size and composition • Household projections • Population density (persons/ha)
Health and community	<ul style="list-style-type: none"> • Schemes involving a gain/loss in community premises (museums, community halls, places of worship) • % people describing their health as 'good' or 'not good' • % people with limiting long term illness • Major causes of death in Camden • % people with a low satisfaction score (self-reported well-being) • % of people using outdoor space for health/exercise • % of active adults • Excess weight • Mortality rate from causes considered preventable • Under 75 mortality rate from cardiovascular disease

	<ul style="list-style-type: none"> considered preventable • Number of care homes for older people • Number of care homes for mental health • Number of sports/playing fields and outdoor recreation spaces • Levels of crime in Camden • Violent crime • % of developments incorporating Secured by Design principles
Deprivation and social exclusion	<ul style="list-style-type: none"> • Household income • Number of Super Output Areas (SOAs) within 10% most deprived in England • Life expectancy • % of unemployed who have been out of work for over one year • Claimant count unemployment rate • Unemployment by ward and sex and long term unemployment • Households with children in families on Key Benefits
Education	<ul style="list-style-type: none"> • Area of new education facilities created • Indices of deprivation – education skills and training • Proportion of adults with poor literacy and numeracy skills • School capacity figures, primary and secondary, and areas of education provision deficiency • Number of NEET's
Housing	<ul style="list-style-type: none"> • Housing stock by tenure • % of dwellings by type • House prices and rents • Ratio of average house price to earnings • Houses with special needs • Number of homeless households • % number of households in unsuitable housing • Number of affordable housing completions • Mix of housing sizes • Number of new homes completed • Vacant residential units • %/Number of all new housing units designed to wheelchair accessibility & Lifetime Homes standards • Number/ proportion of households needing affordable housing per annum. • Traveller pitches • Number/ proportion of traveller households needing pitches • Number/proportion of student housing
Leisure	<ul style="list-style-type: none"> • Completed leisure (D2) floorspace • Access to open space
Town Centres and Employment	<ul style="list-style-type: none"> • Completed retail, food, drink and entertainment floorspace • Vacancy in town centres and other designated frontages

	<ul style="list-style-type: none">• Retail, food, drink and entertainment uses• Employment floorspace completed and available• Growth areas projected floorspace• Industrial structure and key sector• Supply of employment land• Change in VAT registered businesses• Number of secured apprenticeship in Camden
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Appendix 2 provides the detailed identified baseline information. **Appendix 3** provides a list of all the baseline information sources and web links and **Appendix 4** contains additional maps, graphs and tables as referred to in the baseline information table in Appendix 2.

Baseline Information Gaps

A number of gaps have been identified in the existing baseline information collected for the scoping report (as detailed in **Appendix 5**). The reasons for these gaps may be that the information is currently not monitored or that it has not yet been reported on. Identifying these gaps at this stage provides an opportunity to develop methods for future monitoring. Also, as this is the preliminary stage in the SA process, it is possible that additional sources may be discovered through consultation. Should this be the case, the baseline will be updated accordingly.

Stage A3: Identifying key sustainability issues for the Local Plan to address

Having reviewed the relevant plans and programmes (**Appendix 1**) and identified baseline information (**Appendix 2**) the main sustainability issues that have emerged are shown in **Table 5** below.

Table 5: Sustainability issues

Issue	Summary and Source of Evidence
Environmental	
Development and the protection of the historic environment	<p>There are 40 conservation areas, 5645 listed buildings, 13 Archaeological Priority Zones, 12 Registered Parks and Gardens and 1 Scheduled Ancient Monument in Camden (<i>LBC Conservation & English Heritage</i>). Camden's Local List identifies historic buildings and features that are valued by the local community.</p> <p>There are also many heritage assets in adjoining boroughs, some of which can be affected by development in Camden, as well as those which are split between Camden and another borough, such as Regent's Park.</p> <p>Conservation Areas are important in protecting the key elements of our cultural heritage and should be conserved and enhanced. Poor development in such areas can significantly harm their character and appearance.</p> <p>Development pressure in the borough and other factors such as the need to reduce carbon emissions and potential neglect will be challenging given the significant proportion of heritage assets in the borough.</p>
Reducing carbon emissions and promoting energy efficiency and renewable energy	<p>The latest statistics for 2011 show a 12% in a year reduction in carbon emissions per capita for the borough as a whole. While long term trends show that we are on track to achieving our reduction targets there are challenges which remain outside of our control such as the decarbonisation of the national grid and the risk of higher energy demand from extremes in weather.</p> <p>We need to continue to secure energy efficient homes in line with the Government's 2016 zero carbon target and encourage improvements to existing stock. In addition we need to have a stronger focus on helping schools to reduce their carbon footprint.</p> <p><i>Green Action for Change, Second Annual Review, 2013</i></p>
Reducing traffic	<p>Traffic in Camden has decreased significantly since 1993 in contrast to national and regional trends. In the 10 year period to 2012 traffic floor in Camden reduced 25%. It is important that this trend continues as reducing the amount of traffic on Camden's roads will also help to improve air quality through reducing carbon and other emissions</p>

Issue	Summary and Source of Evidence
	<p>caused by cars and motor vehicles.</p> <p>The NPPF recognises the important role of plans and policies have in facilitating sustainable development but also in contributing to wider sustainability and health objectives (<i>NPPF 2012</i>). The London Plan identifies Growth Areas and Areas for Intensification where major developments would be most appropriately located (<i>Source: London Plan</i>)</p> <p>The Council is embarking on a three year programme to create a better and safer cycling network (<i>Green Action for Change, Second Annual Review, 2013</i>)</p>
<p>Limited scope for creating new open space</p>	<p>The majority of new development in the borough occurs on previously developed land and the fact that there is a significant shortage of available land for development and therefore limited scope for creating new open space.</p> <p>The areas of greatest deficiency are in the following parts of the borough: Central London East; SE and NW of Hampstead and Highgate; Kentish Town area; east of Regent's Park area; and SW of Somers Town area</p> <p>(<i>Open Spaces Needs Assessment Report, draft</i>)</p>
<p>Waste management</p>	<p>The last 10 years have seen a general trend of reducing volumes of waste and increasing recycling rates despite population growth. The increase in the borough's population in the future will place increased pressure on existing waste management facilities.</p> <p>The North London Waste Plan will set out the planning framework for waste management in the London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest for the next 15 years up to 2031. It will identify sites for waste management use and set out policies for determining waste planning applications. The NWLP is currently being drafted and the evidence base being compiled.</p>
<p>Poor air quality which does not meet the air quality standards for the borough</p>	<p>Parts of Camden have some of the poorest air quality levels in London and since 2000 the whole of the borough has been declared an Air Quality Management Area (AQMA) for both NO₂ and PM₁₀ (Camden Air Quality Action Plan 2013 - 2015). 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.</p> <p>The National Air Quality Action Plan Volume 1 2011 states that local measures in action plans should include a commitment to putting air quality at the heart of decision making, particularly in other policy areas such as in</p>

Issue	Summary and Source of Evidence
	<p>planning decisions or local development frameworks.</p> <p>The key areas linking planning and air quality are road transport, energy generation, and the operation of certain industrial processes. Each serves as a source of pollution emissions and can be mitigated through the regulation of industrial process (<i>Pollution Prevention and Control Regulations 2000</i>) implementation of sustainable transport measures (<i>NPPF 2012</i>), promotion of energy efficiency and renewable energy sources (<i>NPPF</i>); see also</p> <p><i>Camden's Air Quality Action Plan 2013 – 2015 and Authority Monitoring Report 2012/13</i></p>
<p>Potential contamination on previously developed land</p>	<p>While no sites in the borough are currently designated as contaminated for the purposes of the Environment Act 1990 Part II A, numerous sites in the borough has been previously utilised for heavy industry and other polluting uses and this may pose contamination problems for future development on such sites, especially given the trend for building on previously developed land</p> <p><i>(Environmental Health, Camden)</i></p>
<p>Surface water flooding in parts of the borough</p>	<p>Although there are no areas at risk of flooding from rivers or the sea there are approximately 38,800 properties in the 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.</p> <p>In August 2002, widespread surface water flooding occurred in the north of the borough in West Hampstead and Kentish Town. The topography of Hampstead and the nature of summer thunderstorms make high rainfall and associated flooding events likely in Camden.</p> <p>The NPPF recognises that Local Plans should undertake Strategic Flood Risk Assessment (SFRA).</p>
<p>Water resources</p>	<p>Camden is within Thames Water's London Water Resource Zone – this is classified as 'seriously water stressed.' This means there is a high population with high water demands and limited water availability – it does not reflect water companies ability to supply water.</p> <p>Camden has groundwater source protection zones I & II. The primary use of groundwater protection zones is to signal that within specified areas there are likely to be particular risks posed to the quality or quantity of water obtained, should certain activities take place nearby.</p> <p>The Grand Union canal has moderate status which is a change from good in 2009 (following further investigation) & the Regents canal remains at moderate status due to mitigation measures not yet in place which would make</p>

Issue	Summary and Source of Evidence
	<p>the watercourse more natural.</p> <p><i>(Environment Agency)</i></p>
<p>Issue of disturbance from noise and vibration exacerbated by Camden's density and mixed use nature</p>	<p>Camden's Environmental Health are currently investigating 20 important areas (noise hot spots), 5 of which are first priority (noisiest), as defined by Defra (approx. 20 are on TfL roads). These important areas should be taken into account (<i>NPPF & NPPG</i>).</p> <p>Generally, the number of noise complaints in the borough has decreased. However, noise remains an important issue in terms of the amenity, health and well-being of Camden. (<i>Camden, Environmental Health</i>)</p>
<p>Concern over decline in priority species</p>	<p>Camden Biodiversity Action Plan identified priority species. Need to ensure that priority species do not further decline in the borough and receive adequate protection and encouragement through the planning process.</p>
<p>Promoting sustainable design and use of resources</p>	<p>AMR 2012/13 data shows that higher standards are being achieved in Code for Sustainable Homes and BREEAM.</p> <p>The 2016 zero carbon homes target is approaching and it is important that we continue to promote improvements and innovation in building design resulting in reduced energy consumption. This will assist in reducing air pollution and carbon dioxide emissions from generating power for heating, cooling and electricity.</p>
Social	
<p>Providing suitable housing for a growing population</p>	<p>Camden's population is highly mobile, culturally and ethnically diverse. Projections from revised census estimates indicate high levels of growth and emphasise the comparative youthfulness of local population with few people of the older working age group and large number of single person households.</p> <p>Source: <i>Census/ONS, note - despite the improvements, between mid-2001 and mid-2011, the 2001-based mid-year estimate series over-estimated Camden's population by 18,600 (8.5%).</i></p> <p>There are many types of housing in Camden, these include general needs housing, accommodation for students, older and vulnerable people and traveller accommodation.</p>
<p>The affordability of housing and the supply of affordable housing in Camden</p>	<p>The ratio of median house prices to median earnings in Camden is 13.7 compared with 8.6 across London (<i>DCLG/ Land Registry 2014</i>). Market rents in Camden are around 30% higher than across London (<i>London Rents Map Dec 2013</i>). Over 50% of the need for additional housing in Camden and in London in the last decade has been from households who are unable to afford market</p>

Issue	Summary and Source of Evidence
	<p>housing (<i>Camden Housing Needs Survey Update 2008, London & sub-regional strategy support studies project GLA 2005</i>).</p> <p>Data from the Camden Authority Monitoring Report 2012/13 shows that 53% of the additional homes completed in the financial year 2012/13 were affordable homes, but over the 5 financial years from 2009/10 to 2012/13 only 40% of additional homes were affordable.</p>
<p>Proportion of overcrowded households, particularly in the affordable/social rented sector</p>	<p>13% of Camden households were overcrowded based on an occupancy rating of -1 or lower in the 2011 Census. 20% of Camden households in social rented accommodation were overcrowded on the same basis (<i>Trends in Overcrowding CIS2014-01, GLA 2014</i>).</p> <p>Data from the Camden Authority Monitoring Report 2012/13 shows that 39% of the homes completed in the financial year 2012/13 were studio or one bedroom homes while only 23% of completed homes had 3 or more bedrooms.</p>
<p>Wide disparities between deprived and affluent areas</p>	<p>There are wide disparities of deprivation and affluence within Camden wards.</p> <p>At 2010, Camden was ranked 14th out of 33 local authorities in Greater London & ranked 55 out of the 326 districts in England, in terms of average deprivation (<i>IMD, 2010</i>).</p> <ul style="list-style-type: none"> • Borough Lowest: Hampstead Town 12.17 • Borough Highest: St Pancras and Somers Town 37.48 <p>Overall, Camden is less deprived according to the IMD 2010 compared to 2007.</p> <p>The following five are the most deprived wards in Camden for education skills and training: St Pancras and Somers Town, Haverstock, Regents Park, Kilburn and Kings Cross. It is important to encourage a balance in the supply of such uses to meet the needs of existing and future residents. There is a need to increase opportunities for education, including further education and adult learning in the borough, particularly in areas of deprivation.</p> <p><i>(Indices of Multiple Deprivation, 2010)</i></p>
<p>Promoting health and well-being</p>	<p>Improving health and well-being requires more than improving access to medical treatment and services. There is an important link between the environment in which we live and how healthy we are, both physically and mentally.</p> <p>Adopting healthier behaviours as well as access to public open space can also impact upon health as green space and strong design can have positive therapeutic effects on</p>

Issue	Summary and Source of Evidence
	<p>human mental and physical health.</p> <p><i>Camden Joint Strategic Needs Assessment, 2013</i></p>
<p>Planning for school provision</p>	<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. Secondary school places are expected to meet demand until 2022/23 – development in Kings Cross and West Hampstead Interchange are likely to increase demand in these areas.</p> <p>It is important to encourage a balance in the supply of education facilities to meet the needs of existing and future residents.</p> <p><i>(Camden - Children, schools and families July 2013)</i></p>
<p>Maintaining a reduction of crime levels</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. The increase is due largely to significant rises in theft from person offences (+57%) in Camden's major centres.</p> <p><i>(Joint strategic needs assessment, health, 2013)</i></p>
<p>Economic</p>	
<p>Unemployment and job opportunities for local people</p>	<p>Camden's unemployment rate has been increasing since the previous scoping of the LDF. There is also significant disparity between different wards in Camden, in that some wards in Camden rank very high in unemployment, whereas others rank very low, showing a clear socio-economic divide in the borough</p> <p><i>(jobcentre plus/GLA, JSA claimant count, 2013)</i></p>
<p>Provision of retail floorspace and promoting town centres</p>	<p>The need to provide additional space to for retail in line with the London Plan and the Camden Retail and Town Centre Study 2013 (GVA).</p> <p>The need provide a range of shops and services, including encouraging small and independent traders. The need to respond to challenges including changes in consumer behaviour, new retail models, the growth in online shopping, and competition from out of centre retail development.</p> <p><i>(Camden Annual Retail Frontages Survey)</i></p>
<p>Balancing the demand for housing with the protection of employment land</p>	<p>AMR data suggests land use pressures and conflicts between uses, particularly the demand for housing development over all other land uses and the potential threat this creates for employment generating land uses.</p> <p>Although, Camden Core Strategy acknowledges that the future supply of offices in the borough can meet projected demand allowing more flexibility in the conversion of older office premises to other uses, especially residential.</p>

Issue	Summary and Source of Evidence
Managing impacts associated with major redevelopment	<p>Kings Cross regeneration is substantially underway and together with expected development at Euston will be the key regeneration areas in the borough that also have London wide significance.</p> <p>It is important that regeneration objectives for these and other significant developments contribute to the borough's needs and ensure that adverse impacts are avoided or at least mitigated.</p> <p><i>(Draft Euston Area Plan, 2014)</i></p>

Stage A4: Developing the SA framework consisting of SA objectives and indicators

Developing the SA indicators

The SA objectives in **Table 6** have been developed from the previous SA objectives used during the sustainability appraisal of the recently adopted Site Allocations Document and updated where changes in the sustainability issues have been identified above in **Table 5** and the review of the relevant plans, policies and programmes.

The criteria will then go on to point towards detailed indicators and targets that should be applied in developing the SA framework as part of the next stages of the SA. These indicators and targets have been drawn from the baseline information collected at Stage A2 of the SA process, as well as the relevant plans, policies and programmes, as set out in Table 2 and Appendix 1. Camden's Annual Monitoring Report (AMR) has been particularly important in identifying indicators, as this will play an important role in the monitoring of the successes of the Local Plan in achieving sustainable development. Where possible and appropriate, any additional suitable indicators identified through this SA process will be added to the AMR to enable their effective monitoring.

Table 6: Sustainability Appraisal objectives and indicators

No.	Objective	Criteria	Potential Indicator(s)
SOCIAL/ECONOMIC			
1	To promote the provision of a range of high quality and affordable housing to meet local needs	a) Will the Local Plan increase the supply of housing b) Will the Local Plan protect and promote affordable housing development c) Will the Local Plan provide housing for people, particularly families, on moderate and lower incomes? d) Will the Local Plan encourage development at an appropriate density, standard, size and mix? e) Will the Local Plan provide everybody with the opportunity to live in a better home?	<ul style="list-style-type: none"> • Additional home provision, new home completions • Annual average number of net additional dwellings needed to meet overall housing requirements • Compliance with regional housing targets • % Housing built on previously developed land • Housing Stock by Tenure • Number of affordable housing completions • Ratio of average house price to gross household income • Number of wheelchair accessible properties • Number of new developments meeting Lifetime Homes • Number of homeless households • Condition of housing stock: Unfit dwellings by tenure • Number of overcrowded households • Household size: No of people living in property • % of housing in mixed use schemes

No.	Objective	Criteria	Potential Indicator(s)
			<ul style="list-style-type: none"> • Household composition • Ratio of average house price to gross household income • Additional home provision, new home completions
2	To promote a healthy and safe community	<p>a) Will the Local Plan promote healthy living through e.g. provision of walking, cycling and recreation facilities?</p> <p>b) Will the Local Plan help to promote safety and reduce levels of crime, anti-social behaviour and fear of crime?</p> <p>c) Will the Local Plan encourage improved provision of healthcare facilities in areas of need?</p>	<ul style="list-style-type: none"> • % people who describe their health as good/not good • Number of population with limiting long-term illnesses • Floorspace of community facilities/services lost/retained/ gained • Access to public open space • Number of sports/playing fields and outdoor recreation spaces • Recorded crime per 1,000 population for burglaries, criminal damage, drug offences, robbery and violence against a person. • Percentage of residents surveyed who feel 'fairly safe' or 'very safe' after dark whilst outside their local area • % developments incorporating secure by design principles(No record available) • % Reduction in the number of people killed or seriously injured in road accidents
3	To ensure access to local shopping, community, leisure facilities and open space	<p>a) Will the Local Plan encourage mixed-use development?</p> <p>b) Will the Local Plan encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p> <p>c) Will the Local Plan encourage the location of services in proximity to public transport or increase access to services by public transport?</p> <p>d) Will the Local Plan help to protect, increase/improve open space?</p>	<ul style="list-style-type: none"> • Total number of mixed use developments completed • Distribution of local services across the borough • Floorspace of community facilities/services lost/retained/gained • Town Centre Health Check • % Ground Floor Vacant Floor-space in primary Shopping Frontages (London frontages, town centres and neighbourhood centres • Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres (over 4 years) • Access to public open space • Number of sports/playing fields and outdoor recreation

No.	Objective	Criteria	Potential Indicator(s)
			<ul style="list-style-type: none"> spaces • Open spaces lost/ gained/ improved • Open space deficiency
4	To tackle poverty and social exclusion and promote equal opportunities	<ul style="list-style-type: none"> a) Will the Local Plan encourage development that facilitates social cohesion and be beneficial to disadvantaged groups? b) Will the Local Plan provide for equality of access for all to buildings and services? c) Will the Local Plan encourage development opportunities in those areas in need of economic development? 	<ul style="list-style-type: none"> • Number of Super Output Areas within 10% and 20% most deprived in England. • Unemployment rate by ward • Deprivation by ward • % of public buildings fully accessible • %/ No. of housing units designed to wheelchair accessibility • Number of dwellings meeting Lifetime Homes standards • Number of wheelchair accessible housing in social housing sector • Number of Hostels and Care Homes • % Ground Floor Vacant Floor-space in primary Shopping Frontages (London frontages, town centres and neighbourhood centres • Changes in Vacant Employment Land • Retail frontage survey
5	To encourage and accommodate sustainable economic growth and employment opportunity	<ul style="list-style-type: none"> a) Will the Local Plan encourage the retention and growth of existing, locally based industries? b) Will the Local Plan accommodate new and expanding businesses? c) Will the Local Plan encourage new investment in the local economy and promote development opportunities for employment? d) Will the Local Plan focus growth in growth areas, Central London and in town centres? 	<ul style="list-style-type: none"> • Employment floorspace lost/retained/created • Composition of businesses operating in Camden • Changes in vacant employment land • Net changes in use classes by floorspace • Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres • Completed retail and financial services and offices floorspace • Economic activity of the population of Camden • Occupation of those currently in employment by industry • Unemployment by Ward • Long-term unemployment (% of unemployed who have been out of work for over one year)

No.	Objective	Criteria	Potential Indicator(s)
6	To maximise the benefits of regeneration and development to promote sustainable communities	a) Will the Local Plan encourage investment that will promote social well-being and benefit the economy? b) Will the Local Plan promote access to employment opportunities for local people? c) Will the Local Plan provide for adequate education facilities, including life long learning? d) Will the Local Plan encourage housing development to meet the needs of the local people?	<ul style="list-style-type: none"> • Claimant count unemployment rate • Employment floorspace lost/retained/created • % Unemployment levels • Nos. of local people e • A reduction in NEET numbers • Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres (over 4 years) • % of new housing on previously developed land • Economic Activity of population • Occupation of those currently in employment • Unemployment by Ward • Long-term unemployment (% of unemployed who have been out of work for over one year) • Claimant count unemployment rate • Area of new education facilities created
ENVIRONMENTAL			
7	i) To promote high quality and sustainable urban design ii) To protect and enhance the historic environment	a) Will the Local Plan provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Will the Local Plan ensure enhancement of the public realm and local distinctiveness? c) Will the Local Plan conserve and enhance conservation areas, heritage assets and their settings and other areas of intrinsic and historical value? d) Will the Local Plan	<ul style="list-style-type: none"> • No. of Conservation Areas at risk • Heritage at Risk • No. of Scheduled Ancient Monuments • Extent of Archaeological Priority Zones (APZs) • No. of Tree Preservation Orders (TPOs) served • No. of new developments with BREEAM assessments scores of Very Good or Excellent • No. of developments scoring very good and excellent BREEAM Refurbishment assessments.

No.	Objective	Criteria	Potential Indicator(s)
		encourage the use of sustainable design and construction?	
8	To ensure new development makes efficient use of land, buildings and infrastructure.	a) Will the Local Plan encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Will the Local Plan ensure efficient use of land through maximising densities where appropriate?	<ul style="list-style-type: none"> • % of new housing on previously developed land • % of vacant buildings • Density levels achieved in comparison to London Plan housing targets
9	To reduce reliance on private transport modes and enhance permeability for non-motorised travellers.	a) Will the Local Plan encourage development at locations that enable walking, cycling and/or the use of public transport? b) Will the Local Plan encourage the provision of infrastructure for walking, cycling and/or the provision of public transport? c) Will the Local Plan encourage access for all to public transport? d) Will the Local Plan encourage an increase in car free and car capped housing? e) Will the Local Plan encourage the transportation of freight by means other than road?	<ul style="list-style-type: none"> • % increase in bus passenger journeys • % reduction in number of people killed or seriously injured in road accidents. • % reduction in motor traffic flows through the borough • % increase in cycling • location of major transport demand generating developments • car-free and car-capped housing as percentage of new housing • distribution of local services throughout the borough
10	To improve amenity by minimising the impacts associated	a) Will the Local Plan ensure that the amenity of	<ul style="list-style-type: none"> • Nos. of complaints about noise • No of important areas as defined by Defra

No.	Objective	Criteria	Potential Indicator(s)
	with development	<p>neighbours is not unduly impacted?</p> <p>b) Will the Local Plan ensure that development and operations will not affect noise sensitive uses?</p>	
11	To protect and manage water resources and reduce surface water flood risk	<p>a) Will the Local Plan promote the sustainable use of water resources?</p> <p>b) Will the Local Plan encourage development that incorporates sustainable drainage?</p> <p>c) Does the Local Plan take into account potential flood risk in Camden?</p> <p>d) Will the Local Plan promote the protection and enhancement of the quality of Camden's waterways?</p>	<ul style="list-style-type: none"> • %/No. of new developments incorporating flood mitigation measures in their design to reduce flood risk e.g. SUDS, evacuation plans, etc • No. of planning permissions granted contrary to advice from the Environment Agency on flooding or water quality
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<p>a) Will the Local Plan protect and enhance natural habitats in the borough, particularly those of priority species (includes terrestrial and aquatic)?</p> <p>b) Will the Local Plan provide for the protection of biodiversity and open space in the borough?</p> <p>c) Will the Local Plan encourage the creation of new habitats, including through the provision of additional open space and green roofs?</p> <p>d) Will the Local Plan protect and provide</p>	<ul style="list-style-type: none"> • Change in priority species (by type) • Change in priority habitats (by type) • Net loss/gain of Sites of Nature Conservation Importance (SNCIs) and designated open spaces • Open space deficiency • No. of tree preservation orders served • No. of new developments incorporating green roofs, landscaping or open space to improve biodiversity

No.	Objective	Criteria	Potential Indicator(s)
		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	<ul style="list-style-type: none"> • % new developments using sustainable construction • % of households recycling • % of total waste recycled and composted • Annual household waste per head of population (tonnes) • % of household waste recycled
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?	<ul style="list-style-type: none"> • Number of days when air pollution exceeds limits • Nitrogen dioxide (NO₂) and particulate matter (PM₁₀) emissions • Reduction in traffic flows along roads in the borough • Increase in walking • Increase in cycling • Increase in bus passenger journeys • Car-free and car-capped housing
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 ₂ and other greenhouse gas concentrations in the atmosphere?	<ul style="list-style-type: none"> • Proportion of energy generated from renewable sources • Carbon dioxide reduction in the borough • Number of new developments achieving BREEAM ratings of very good or excellent
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	<ul style="list-style-type: none"> • Number of new developments achieving BREEAM ratings of very good or excellent • Proportion of energy generated from renewable sources

No.	Objective	Criteria	Potential Indicator(s)
		<p>resources?</p> <p>c) Will the plan encourage sustainable design and construction?</p>	<ul style="list-style-type: none"> • %/No. of new developments incorporating water conservation measures e.g. SUDS • % new developments using sustainable construction

Stage A5: Consulting the relevant authorities on the scope of the SA

Consultation on the SA Scoping Report

The Government (through the *Environmental Assessment of Plans and Programmes Regulations 2004*) requires the contents of the scoping report to be consulted on with the following agencies:

- The Environment Agency
- Natural England
- English Heritage

We are now at the stage where we wish to obtain the views of these agencies, as well as other interested organisations and parties, on this scoping report. Consultation at this stage will help to make sure that the SA will be as comprehensive and robust as possible and meet statutory requirements.

It is available for consultation for a period of five weeks in order to comply with the SEA Regulations (*The Environmental Assessment of Plans and Programmes Regulations 2004*, 12(6)).

In seeking comments on this report, we have asked consultees to consider the following questions.

Q. 1 Is the approach taken, in using the format of the 2008 LDF SA Scoping report as a basis for the Local Plan SA Scoping Report considered to be appropriate?

Q.2 Is the document clearly structured and does it cover the main issues in an understandable way?

Q.3 Is the review at Tables 2 and 3 and Appendix 1 of other plans, programmes and sustainability objectives sufficient for the purposes of this document? Are there any other relevant plans, programmes and sustainability objectives that should be taken into account?

Q4 Do you consider that the range of baseline information at Appendix 2 is appropriate and/or are there any further baseline indicators that might provide useful information and where might they be sourced?

Q.5 Do you have any suggestions on how the baseline information gaps can be filled?

Q.6 Do you consider that the main sustainability issues have been satisfactorily identified from the baseline information?

Q.7 Do you consider that these proposed SA objectives are sufficient and adequately reflect the key sustainability issues?

Following the period of consultation any comments on the Scoping Report will be considered and used to look at how the proposed SA should be revised to respond to them.

The emerging draft objectives of the Local Plan will be tested against the SA objectives set out in this Scoping Report. This will allow an assessment of the relationship between the Local Plan objectives and sustainability objectives, and highlight any issues or inconsistencies.

Following from an assessment of the relationship between the Local Plan and sustainability objectives, an appraisal of emerging policy options for the Local Plan will be carried out (and, separately, consultees will be consulted on the options being considered in the Local Plan). The draft SA Report will then be produced (which will include an assessment of the options appraised) alongside the preferred options for the Local Plan, which will then be subject to public consultation. The Final SA Report will be published alongside the (pre-submission) version of the Local Plan.

Appendix 1: Plans and programmes

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Local Plan	Implications and Considerations for SA:	Implications and Considerations for the Local Plan
NATIONAL:				
1.	National Planning Policy Framework 2012 (and associated Planning Practice Guidance)	<p>The NPPF introduces a presumption in favour of sustainable development. The government's planning policy approach for delivering sustainable development re set out under the following key policy themes:</p> <ol style="list-style-type: none"> 1. Building a strong, competitive economy 2. Ensuring the vitality of town centres 3. Supporting a prosperous rural economy 4. Promoting sustainable transport 5. Supporting high quality communications infrastructure 6. Delivering a wide choice of high quality homes 7. Requiring good design 8. Promoting healthy communities 9. Protecting Green Belt land 10. Meeting the challenge of climate change, flooding and coastal change 11. Conserving and enhancing the natural environment 12. Conserving and enhancing the historic environment 13. Facilitating the sustainable use of minerals 	<p>The NPPF contains a number of principles, objectives and policies which should be taken into account in considering the sustainability objectives. There are some areas of potential conflict, e.g. supporting economic growth and more efficient use of land (e.g. through higher density) against design and conservation related considerations and objectives.</p>	<p>The Local Plan will have to reflect these objectives and set out principles ensuring environmental, economic and social objectives are considered in accordance with the NPPF. Public participation and consultation will form a key part of drawing up the Local Plan.</p>
2.	The UK Sustainable Development Strategy: Securing the Future (UK)	<p>This document sets the national sustainable development framework and sets out five guiding principles for Sustainable Development:</p> <ul style="list-style-type: none"> • Ensuring a strong, healthy and just society • Living within environmental limits • Achieving a sustainable economy 	<p>Ensure that the range of sustainability objectives reflect key principles and priorities and</p>	<p>The Local Plan should reflect and contribute to the national Sustainable Development</p>

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Local Plan	Implications and Considerations for SA:	Implications and Considerations for the Local Plan
	<p>Govt 2005)</p>	<ul style="list-style-type: none"> • Promoting good governance • Using sound science responsibly <p>It identifies four priority areas for action, shared across the UK:</p> <ul style="list-style-type: none"> • Sustainable Consumption and Production –looking at how goods and services are produced, the impacts of products and materials across their whole lifecycle and reducing the inefficient use of resources and to break the link between economic growth and environmental degradation. • Climate Change and Energy –to secure major changes in the way energy is generated and used, and in other activities that release the gases that affect climate change. • Natural Resource Protection and Environmental Enhancement – to ensure a decent environment for everyone, and a more integrated policy framework. • Sustainable Communities –to create sustainable communities that embody the principles of sustainable development at the local level and also applies those principles everywhere else. <p>It sets out a wide range of indicators and targets including 20 UK Framework indicators and 48 supplementary indicators reflecting priorities of the Strategy.</p>	<p>promote sustainable development and communities</p>	<p>Strategy principles and priorities.</p>
<p>3.</p>	<p>Sustainable Communities: Building for the Future (ODPM 2003)</p>	<p>This sets out a long-term national programme of how the Government intends to deliver sustainable communities. It focuses mainly on tackling housing supply issues in the South East, low demand in other parts of the country, and the quality of housing and public spaces. The main elements are:</p> <ul style="list-style-type: none"> • Sustainable communities. 	<p>Use sustainability objectives that seek to address housing supply, particularly affordable housing, and promote key environmental and</p>	<p>The Local Plan should build upon relevant elements of the Communities Plan. The Local Plan should not conflict</p>

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Local Plan	Implications and Considerations for SA:	Implications and Considerations for the Local Plan
		<ul style="list-style-type: none"> • Step change in housing supply. • New growth areas. • Decent homes; including the need to bring council homes up to a decent standard. • Improvements to the local environment; particularly the public realm. <p>It recognises that the success of communities relies on more than just housing and communities must develop economically, socially and environmentally.</p>	sustainability issues in line with main objectives	with the national programme of action.
4.	<p>Sustainable Communities in London: Building for the Future (ODPM 2003)</p>	<p>This regional programme builds upon the national programme of action and sets out proposals for achieving sustainable communities in London that:</p> <ul style="list-style-type: none"> • Are prosperous; • Have decent homes for sale or rent at a price people can afford; • Safeguard green and open space; • Enjoy a well-designed, accessible and pleasant living and working environment; • Are effectively and fairly governed with a strong sense of community. <p>It identifies the main strategic challenges facing London to accommodate growth and to alleviate poverty and deprivation as:</p> <ul style="list-style-type: none"> • Provide more and better designed and affordable homes, including homes for key workers; • Improve public transport and other vital infrastructure required to support the development of new and growing communities; • Raise education standards and skill levels across the capital; 	SA should include objectives that support the achievement of sustainable communities such as addressing housing supply, particularly affordable housing, and promote key environmental and sustainability issues in line with proposals and main challenges as relevant.	The Local Plan should be built upon relevant elements of the regional element of the Communities Plan. The Local Plan should not conflict with the regional programme.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Local Plan	Implications and Considerations for SA:	Implications and Considerations for the Local Plan
		<ul style="list-style-type: none"> Tackle crime, anti-social behaviour and the fear of crime. 		
5.	Sustainable Communities: Homes for All (ODPM 2005)	<p>This strategy sets out the Government's five-year programme for housing. Topics covered include proposals to expand home ownership and revive the UK housing market, affordable housing and support for first time buyers. It includes measures to improve supply and delivery while protecting the environment and action in low demand and growth areas; details of the Government's First Time Buyer, Key Worker and Homebuy schemes; and action on homelessness to halve numbers living in temporary accommodation by 2010 and addressing other management and tenure issues. Targets include:</p> <ul style="list-style-type: none"> Maintain target that 60% of all new housing development should be built on brownfield land Raise design standards, with the aim that a hundred more developments gain a Building for Life Award for Excellence Improve minimum energy standards for all new homes, reducing carbon emissions by around a further 25% Establish a new Code for Sustainable Buildings to promote excellence in environmental performance Raise the average energy efficiency of the whole of the residential housing stock by 20% compared with 2000. Promote more sustainable buildings, saving energy, water and materials and helping to meet the target to cut UK carbon emissions by 60% by 2050: Promote more sustainable, high quality design and construction, to reduce waste and improve resource efficiency. 	SA should include objectives that support the achievement of sustainable housing provision.	<p>Local Plan principles should reflect support for improving housing supply to relevant design standards and in an energy efficient manner.</p> <p>The Local Plan should ensure adequate provision of new housing to meet future demand.</p>
6.	The Code for Sustainable Homes: Setting the	The Code is a voluntary standard designed to improve the overall sustainability of new homes. The Code measures the sustainability of a home against nine design categories, rating the 'whole home' as a complete package. The design categories are Energy & CO2	SA should include objectives that support the achievement of	The Local Plan should support approach set out within the Code for

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Local Plan	Implications and Considerations for SA:	Implications and Considerations for the Local Plan
	standard in sustainability for new homes & Technical Guide 2010	Emissions, Pollution, Water, Heath & Wellbeing, Materials, Management, Surface, Water Run-off, Ecology, and Waste.	sustainable housing provision.	achieving sustainable housing.
7.	The National Adaptation Programme, 2013	<p>The programme recognises the challenges cities face in a changing climate – with higher population density “including a larger proportion of vulnerable groups, concentrated assets, infrastructure, transport systems, buildings, schools, hospitals and businesses are expected to be acutely impacted by increased severity and frequency of flooding, higher summer temperatures, heat waves, extreme weather events and increased pressure on water resources”</p> <p>Requirement of core cities, London Councils and the GLA to work together to deliver innovative solutions to climate change under the following principles:</p> <ul style="list-style-type: none"> • Embed climate risk management in the Built Environment; • Strengthen the climate resilience of infrastructure; • Address and build resilience to the Health and Wellbeing impacts of climate change; • Address climate impacts on Business and Services; • Work jointly to develop a business case that increases understanding of the benefits of early action, as well as the risks of inaction, by the development of a model approach to business case management. 	SA should aim to reflect the focus of these principles.	The Local Plan should support the approach and areas of action where appropriate.
8.	Climate Change: The	This is an update on the programme introduced in 2000. The Programme sets out the Government’s commitments at international	SA should include objectives that	The Local Plan should support

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	UK Programme 2006 (UK Govt 2006)	and domestic levels to meet the challenge of climate change and meet its targets under the Kyoto Protocol. It also sets out the approach to strengthening the role of individuals. The policies are expected to reduce the UK's emissions of the basket of greenhouse gases to 23-25 per cent below base year levels. It is also expected to reduce the UK's carbon dioxide emissions to 15-18 per cent below 1990 levels by 2010. The Government believes that the UK can achieve the domestic target of a 20 per cent reduction by 2010.	support the achievement of these targets.	development that contributes to the achievement of these targets.
9.	Transport White Paper- The Future of Transport: A Network for 2030 (DoT 2004)	<p>This White Paper builds upon the 10-year Transport Plan and looks at the factors that will shape travel and transport networks over the next 30 years. It sets out how the Government proposes to respond to pressures balanced against safeguarding economic and social well-being and the environment. It highlights that is essential that planning and transport policies are closely co-ordinated to produce more sustainable patterns of development and travel. It includes three key themes:</p> <ul style="list-style-type: none"> • Sustained investment over the long term-setting out expenditure plans to 2015 and aspirations to 2030 • Improvements in transport management- including changes to the rail industry • Planning ahead-including making better links between housing and economic growth and infrastructure. <p>A wide range of objectives addressing public and private transport infrastructure provision, use and implications is set out.</p>	The SA objectives should aim to reflect the focus of relevant elements of the broad themes applicable to the local level.	The Local Plan should take account of the national strategy for transport as translated to local transport planning issues. Plan policies could be used to help achieve the targets set out in the Transport Plan.
10.	Transport White Paper – Cutting carbon, creating	<p>The vision is for a transport system that is an engine for economic growth but one that is greener and safer and improves the quality of life in our communities.</p> <p>This White Paper forms part of the dft's overall strategy to tackle</p>	The SA objectives should aim to reflect the focus of relevant elements of the broad themes	Local plan policies could be used to help achieve the targets set out in the white paper.

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	growth: making sustainable local transport happen (2011)	carbon emissions from transport. It sets out what Government believes is the best way in the short term to reduce emissions at the local level, using the tools that are available to us now, principally by encouraging people to make more sustainable travel choices for shorter journeys. This White Paper is about providing the early reduction in carbon emissions that local action is best placed to deliver, while facilitating the access to local jobs that will boost economic growth.	applicable to the local level	
11.	National Air Quality Strategy for England; Wales; Scotland and Northern Ireland: Working Together for Clean Air (DEFRA 2000 and updated 2003)	<p>The Strategy aims to set out the current and future air quality policy in the UK in the medium term. It describes the current and potential future levels of air pollution in the UK and provides a framework to help identify what can be done to improve air quality. National Air Quality Objectives alongside European Directive limit and/or target values have been set for 9 of the major air pollutants: benzene, 1, 3 butadiene, carbon monoxide, lead, nitrogen dioxide, ozone, particulates, polyaromatic hydrocarbons and sulphur dioxide.</p> <p>Consultation on a proposed review of the strategy highlights that the UK has missed objectives for nitrogen dioxide (2005) and ozone (2005) and just missed those for particulates (2004). The UK is projected to miss objectives for polycyclic aromatic hydrocarbons (2010), however the objectives will be met in a large part of the country (up to 99.5%).</p> <p>The current strategy highlights that land use planning and transport plans and strategies will have a direct effect on improving air quality – particularly given the impact of traffic on air pollution.</p>	SA objectives should support measures that can contribute to improved air quality taking into account the national guidance.	The Local Plan should be aware of the national guidance and should promote the achievement of the targets and objectives set out. This is particularly relevant in Camden, where national air quality standards are not currently being met.
12.	The air quality strategy for England, Scotland,	The aim of the air quality strategy is to set out air quality objectives and policy options to further improve air quality in the UK from today into the long term. As well as direct benefits to public	SA objectives should support measures that can contribute to improved air quality	The Local Plan should be aware of the national guidance and

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	<p>Wales and Northern Ireland (Volume 1, 2007, Volume 2, 2011)</p>	<p>health, these options are intended to provide important benefits to quality of life and help to protect our environment.</p> <p>This document provides an overview and outline of the UK Government and devolved administrations' ambient (outdoor) air quality policy. It sets out a way forward for work and planning on air quality issues, details objectives to be achieved, and proposes measures to be considered further to help reach them. The strategy is based on a thorough and detailed analysis of estimating reductions in emissions and concentrations from existing policies and proposed new policy measures, and quantification and valuation of benefits and estimated costs (the analysis is set out in more detail in Volume 2 of the strategy and the updated Third Report by the Interdepartmental Group on Costs and Benefits (IGCB)).</p>	<p>taking into account the national guidance.</p>	<p>should promote the achievement of the targets and objectives set out. This is particularly relevant in Camden, where national air quality standards are not currently being met.</p>
<p>13.</p>	<p>Energy White Paper-Our Energy Future, Creating a Low Carbon Economy (DTI 2003)</p>	<p>This defines the long-term strategic vision for energy policy combining environmental, security of supply, competitiveness and social goals. It includes four goals:</p> <ul style="list-style-type: none"> • To put ourselves on a path to cut the UK's carbon dioxide emissions - the main contributor to global warming - by some 60% by about 2050, with real progress by 2020; • To maintain the reliability of energy supplies; • To promote competitive markets in the UK and beyond, helping to raise the rate of sustainable economic growth and to improve our productivity; and • To ensure that every home is adequately and affordably heated. <p>The main target is the reduction in carbon dioxide emissions of 60% from current levels by about 2050.</p>	<p>SA objectives should support measures that can contribute to reducing carbon dioxide emissions in line with national goals.</p>	<p>The Local Plan should encourage measures that can assist in the reduction of carbon dioxide emissions.</p>

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14.	Energy White Paper – Planning for our electric future (2012)	<p>This White Paper sets out the Government’s commitment to transform the UK’s electricity system to ensure that our future electricity supply is secure, low-carbon and affordable.</p> <p>The package of reforms outlined in this document aim to achieve the following by 2030: a flexible, smart and responsive electricity system, powered by a diverse and secure range of low-carbon sources of electricity, with a full part played by demand management, storage and interconnection; competition between low-carbon technologies that will help to keep costs down; a network that will be able to meet the increasing demand that will result from the electrification of our transport and heating systems; and making of this transition at the least cost to the consumer.</p>	SA objectives should support measures to provide a range of low carbon sources of electricity.	The Local Plan should encourage measures to provide low carbon sources of electricity.
15.	Building a Greener Future – Towards Zero Carbon Development 2006	This report sets out the Government's proposals to reduce the carbon footprint of new housing development and indicates the Government's views on the importance of moving towards zero carbon in new housing. The report also explores the relationship between the planning system, Code for Sustainable Homes and Building Regulations in delivering ambitions for zero carbon and proposes a timetable for revising the Building Regulations in order to reach zero carbon development in all new housing in England & Wales.	SA objectives should reflect approaches to achieving zero carbon development.	The Local Plan should promote opportunities for zero carbon development.
16.	Waste Management Plan for England 2013	<p>This plan supersedes the 2007 National Waste Management Strategy. The principal commitment of the Plan is to work towards a longer term vision of a zero waste economy in which material resources are reused, recycled or recovered wherever possible and only disposed of as the option of last resort.</p> <p>The Plan seeks to support the achievement of the following targets:</p>	SA objectives should reflect targets to improve levels of recycling	The Local Plan should help ensure that these targets continue to be met in the future.

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		<ol style="list-style-type: none"> 1. increase the recycling of plastic packaging to 42% by 2017. 2. at least 50% by weight of waste from households is prepared for re-use or recycled by 2020. 3. at least 70% by weight of construction and demolition waste is subjected to material recovery by 2020. 		
17.	National Planning Policy for Waste 2014	<p>The NPPW sets out the Government's streamlined policy framework for waste, replacing PPS10. It emphasise:</p> <ul style="list-style-type: none"> • Positive planning to deliver sustainable development and resource efficiency; • Consideration of waste management needs alongside other key spatial planning concerns such as transport and housing; • Providing a framework for stakeholder engagement; • Enabling waste to be disposed and recovered in line with the Proximity Principle; • Moving management up the Waste Hierarchy without endangering the environment or human health • Ensuring design of all developments contributes to the objectives of sustainable waste management and improved resource efficiency. 	SA objectives should reflect principles in sustainable waste management.	Where appropriate the Local Plan should meet the key planning objectives of national planning policy.
18.	Urban White Paper – Our Towns and Cities: The Future (ODPM 2000)	<p>The Urban White Paper sets out a vision for the future of towns and cities. It identifies four steps to making "all urban areas places for people":</p> <ul style="list-style-type: none"> • Getting the design and quality of the urban fabric right. • Enabling all towns and cities to create and share prosperity. • Providing the quality services people need. • Equipping people to participate in developing their communities. <p>This vision of urban living includes:</p> <ul style="list-style-type: none"> • People living in attractive, well-kept towns and cities which use 	SA objectives should reflect the general principles to achieve higher quality, more accessible, safer and sustainable urban environments.	The Local Plan should reflect the general principles to achieve higher quality, more accessible, safer and sustainable urban environments. It should also seek

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		<p>space and buildings well;</p> <ul style="list-style-type: none"> • Good design and planning, which makes it practical to live in a more environmentally sustainable way, with less noise, pollution and traffic congestion; • Towns and cities able to create and share prosperity, investing to help all their citizens reach their full potential; and • Good quality services-health, education, housing, transport, finance, shopping, leisure and protection from crime that meet the needs of people and businesses wherever they are. <p>As well as targets on crime, education attainment, health and unemployment it includes targets such as:</p> <ul style="list-style-type: none"> • Better, safer and more reliable transport systems, leading to the increased use of public transport and reductions in road congestion by 2010; • Better housing with all social housing being of a decent standard by 2010 and with most improvement taking place in deprived areas; • A better environment with 60% of new housing provided on previously developed land or through conversions of existing buildings by 2008; 17% of underused land reclaimed by 2010; • Better designed buildings and places; and clean and more attractive streets. 		<p>to contribute to the supply of new housing on previously developed land.</p>
19.	By Design: Urban Design in the Planning System - Towards Better	<p>The aim of this guidance is to encourage better urban design and promote higher standards as a supplement to PPG1 (now superseded by PPS1). The Government's policy for design in the planning system is now contained in PPS1 and developed further in other PPSs/PPGs. It has been produced to stimulate thinking about urban design. The guide is relevant to all aspects of the built environment including the design of buildings and spaces, landscapes and transport systems.</p>	<p>SA objectives should reflect the general principles to achieve higher quality and sustainable urban design</p>	<p>The Local Plan should reflect the general principles to achieve higher quality and sustainable urban design and</p>

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	Practice (ODPM and CABE 2000)			incorporate policies to require this of new developments in the borough.
20.	Guidance on Tall Buildings (CABE and English Heritage 2007)	In January 2007, CABE and EH produced this draft guidance to replace the existing Guidance on Tall Buildings published in 2003. The draft guidance sets out similar requirements to the adopted guidance. However, the draft places greater importance on the need for local authorities to consider appropriate locations for tall buildings in their areas and undertaking urban design studies to identify these.	SA objectives should reflect the general principles to achieve higher quality and sustainable design.	Need to look at how we can incorporate the designation of areas for tall buildings being potentially appropriate. However, it is necessary to make it clear that such proposals would still have to comply with sustainable design and amenity requirements.
21.	Building Research Establishment Environmental Assessment Method (BREEAM) / Refurbishmen	BREEAM assesses the environmental performance of buildings and provides ratings in the following areas: <ul style="list-style-type: none"> • Management: overall management policy, commissioning site management and procedural issues • Energy use: operational energy and carbon dioxide (CO2) issues • Health and well-being: indoor and external issues affecting health and well-being 	SA objectives should reflect measures that support better environmental performance of buildings	The Local Plan should promote the use of BREEAM in helping achieve better environmental performance of

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	t)	<ul style="list-style-type: none"> • Pollution: air and water pollution issues • Transport: transport-related CO2 and location-related factors • Land use: greenfield and brownfield sites • Ecology: ecological value conservation and enhancement of the site • Materials: environmental implication of building materials, including life-cycle impacts • Water: consumption and water efficiency <p>This programme sets the standards for development schemes to attain, so minimising their environmental impact, in particular through the implementation of energy and water efficiency techniques. BREEAM refurbishment is the version of BREEAM applied to residential development.</p>		development in the borough.
22.	Biodiversity 2020: A strategy for England's wildlife and ecosystem services	<p>The mission for this strategy for the next decade, is: to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.</p> <p>The strategy has developed a set of high level outcomes to achieve this overarching objective by 2020. These outcomes will be delivered by action in the following four areas:</p> <ul style="list-style-type: none"> • a more integrated large-scale approach to conservation on land and at sea • putting people at the heart of biodiversity policy • reducing environmental pressures • improving our knowledge 	SA objectives should incorporate the key aims of the strategy.	The Local Plan should take into account the objectives and points for action and help ensure its implementation through planning.
23.	Working with the grain of	The overarching vision of this Strategy is <i>for a country where wild species and habitats are part of healthy functioning ecosystems; where</i>	SA objectives should incorporate the key	The Local Plan should help

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	<p>nature: a biodiversity strategy for England (Defra 2002)</p>	<p><i>we nurture, treasure and enhance our biodiversity, and where biodiversity is a natural consideration of policies and decisions, and in society as a whole.</i></p> <p>The Strategy's specific vision for towns and cities is to have <i>towns and cities which have a place for wildlife, and in which a flourishing biodiversity makes a real contribution to the quality of life of urban residents, workers and visitors. Development that makes minimal impact on wildlife habitats and contributes to the conservation of biodiversity.</i></p> <p>Five key aims for protecting biodiversity in towns and cities are also set out in the Strategy as follows:</p> <ul style="list-style-type: none"> ● <i>To ensure that cities, towns and other settlements contribute fully to the goals of biodiversity conservation</i> ● <i>To ensure that construction, planning, development and regeneration have minimal adverse impacts on biodiversity and enhance where possible</i> ● <i>To ensure that biodiversity conservation is integral to sustainable urban communities, both in the built environment, and in parks and green spaces</i> ● <i>To ensure that biodiversity conservation is integral to measures to improve the quality of people's lives, delivered through other initiatives e.g. Community Strategies, including Neighbourhood Renewal and Cultural Strategies, social inclusion, health and equality of opportunity</i> ● <i>To value, further and enhance people's own contributions to improving biodiversity in towns and cities and to increase their access to it</i> 	<p>aims of the strategy.</p>	<p>promote the vision of the strategy for towns and cities and ensure that it does not impede the achievement of the five key aims for towns and cities.</p>
24.	Fair Society,	Focuses on interventions that reduce both health inequalities and	The aims of this	The Local Plan

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	Healthy Lives, The Marmot Review	mitigate climate change, by: active travel; good quality open and green spaces; Improving the food environment in local; energy efficiency of housing; integrate the planning, transport, housing, environmental and health systems to address the social determinants of health; reduce social isolation.	report should be incorporated into the SA.	should help promote the aims set out in this report.
25.	Planning healthier places – report from the reuniting health with planning project, TCPA 2013	<p>The report states that local plans should be flexible enough to facilitate place based innovations that could improve health and well-being.</p> <p>Recommendations for planning and public health:</p> <ul style="list-style-type: none"> • Think laterally and work collaboratively; • Build shared knowledge and competencies on the role of planning. 	The aims of this report should be incorporated into the SA.	The Local Plan should be flexible to facilitate innovations that could improve health and wellbeing in Camden.

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26.	Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites	This Circular replaces Circular 1/94, <i>Gypsy Sites and Planning</i> and provides updated guidance on the planning aspects of finding sites for gypsies and travellers and how local authorities and gypsies and travellers can work together to achieve that aim.	The SA objectives should reflect the intentions of the Circular to ensure that everyone has the opportunity of living in a decent home.	The Local Plan should include policies on the provision of a range of housing to meet different needs.
27.	Planning policy for traveller sites 2012	<p>The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.</p> <p>In this paper the government sets out a number of aims with regard to traveller sites, this includes the requirement of Local authorities to make their own assessment of need.</p> <p>The document includes specific planning policies for traveller sites.</p>	The SA objectives should reflect the aims of this policy.	The aims and policies of this document should be considered in the development of Local Plan policies.
28.	Planning Policy Statement 5, Practice Guide 2010	<p>While PPS5 was deleted the practice guide remains valid and Government endorsed and remains relevant and useful in the application of the NPPF, above. The document includes the following key policy themes:</p> <ul style="list-style-type: none"> - heritage assets and significance - heritage assets and climate change - regional and local planning approaches - permitted development and Article 4 Directions 	The SA should consider the importance of heritage assets.	The Local Plan should take the advice of PPS5 into account and review any updated document.
29.	New Policy document for planning	Sets out the Government's proposals for changes to planning obligations in the context of new statutory restrictions upon the use of planning obligations following the introduction of the Community	SA objectives should reflect support for requirements and	Local Plan should reflect support for requirements and

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	obligations: consultation (2010)	Infrastructure Levy (CIL) Sets out the following objectives underlying the reform of the planning obligations system: (a) Clarifying the purposes of planning obligations in the light of CIL (b) Preventing the opportunity for 'double charging' through use of both planning obligations and CIL (c) Putting tariff-style charges on a better statutory basis (d) Streamlining planning policies	financial measures to make development acceptable.	financial measures to make development acceptable and use of CIL.
30.	The Community Infrastructure Levy Regulations 2010 and amendments 2014	The Community Infrastructure Levy (the levy) is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area.	The SA should consider the impact of CIL in delivering local infrastructure.	In drafting, the Local Plan should take into account the draft CIL.
31.	Thames Corridor Abstraction Management Strategy (Environment Agency, June 2004)	This is a six-year plan detailing how water resources are managed in a specific catchment area. The strategy assesses current water resources and includes information about how much water can be abstracted to meet economic, industry and drinking water supplies. This can influence the way in which water resources are managed.	Water resources need to be considered through the SA framework.	While the Council does not have control over water abstraction, the Local Plan can be used to ensure water resources in Camden are managed as effectively as possible.
32.	Model Procedures for the Management	This document is linked to PPS23 and provides a <i>risk management framework</i> when dealing with land affected by contamination. The procedures and assessment set out are intended to be used when considering a specific site with potential contamination, rather than at a	None.	Take into account and support in policy as appropriate.

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	<p>of Contaminated Land (Contaminated Land Report 11) (Environment Agency, September 2004)</p>	<p>strategic or borough-wide level.</p>		
33.	<p>Thames Region Catchment Flood Management Plan (consultation document, Environment Agency, January 2007)</p>	<p>The CFMP is a high-level strategic planning tool, which should be used to agree policies for sustainable floor risk management, taking into account likely impacts of climate change and future development across the region. The document is linked closely to PPS25 and sets out the flood risk across the Thames region considering: the distribution of property at risk from fluvial flooding; and probability and historic flood events. It can be used to inform the SFRA.</p> <p>The main messages it sets out for the regions are:</p> <ul style="list-style-type: none"> • Flood defences cannot be built to protect everything • Climate change will be the major cause of increased flood risk in the future • The flood plain is our most important asset in managing flood • Development and urban regeneration provide a crucial opportunity to manage the risk. <p>The document states specifically that a major part of this will be through planning and development and that the location, layout and design of development can all reduce flood risk.</p>	<p>The SA Framework should include reference to flood risk management as an indicator of sustainable development.</p>	<p>It will be important that the Local Plan serve to help minimise flood risk in the region, particularly given that the CFMP refers to the location, layout and design of development, which can be controlled through the Local Plan, being significant in reducing flood risk.</p>
34.	<p>Sustainable Drainage</p>	<p>The booklet highlights the problems caused by conventional urban drainage systems and identifies alternate approaches, referred to as</p>	<p>Current and future guidance to be</p>	<p>The Local Plan should reflect the</p>

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	Systems – An Introduction (Environment Agency, May 2003)	<p>SUDS (Sustainable Urban Drainage Systems). It provides an introduction to SUDS and suggests different approaches.</p> <p>Technical SUDS guidance and National SUDS standards to be published this year.</p>	considered through the SA framework.	technical and national SUDS guidance.
35.	Bringing your rivers back to life – A Strategy for restoring rivers in North London (Environment Agency, February 2006)	<p>This is a strategy for restoring rivers in North London. River restoration offers an opportunity to return to a more sustainable approach to managing urban rivers. River restoration can play a positive role in urban regeneration by providing a wide range of social and environmental benefits.</p> <p>Within Camden, the strategy recommends in-channel habitat enhancement along the Regent's Canal.</p>	Sustainable management of waterways should be considered through the SA framework.	The in-channel habitat of the Regent's Canal should be enhanced through the Local Plan, perhaps through inclusion of specific policies on new developments adjacent to the canal.
36.	Understanding place: conservation area designation, appraisal and management (English Heritage March 2011)	<p><i>Brings together and updates Guidance on conservation area appraisals (English Heritage 2005) and Guidance on the management of conservation areas (English Heritage 2005).</i></p> <p>The Guidance identifies the key aspects of good practice that need to be taken into account by local authorities in managing their conservation areas. It aims to relate the designation and management of conservation areas to the principles of conservation management planning for historic areas, outlines how management of conservation areas relates to the new development plans system and provides references to other relevant information.</p>	The protection of the historic environment should form part of a sustainability appraisal.	Conservation principles should form a part of the Local Plan.
37.	Transport and the historic	Sets out the broad principles of English Heritage's vision for long-term national transport policy. It is intended to inform decisions at local and		Consideration should be given to

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	<p>environment (English Heritage, March 2004)</p>	<p>regional levels as well as stating English Heritage's position on Government policy. Specifically it mentions that we should encourage a switch to less damaging forms of transport and promote planning policies that help to reduce the need to travel.</p>		<p>the potential impact transport can have on the historic environment and how planning policy can help to mitigate the impacts.</p>
<p>38.</p>	<p>Streets for All: A guide to the management of London's Streets (English Heritage, March 2000)</p>	<p>This is a guide to the management of London's streets for all those responsible in any way for their appearance and to show all users how the streets they use could be. The purpose of this guide is to make the streets of London attractive, safe and enjoyable spaces for people. It builds on the 1999 report of the Urban Task Force <i>Towards an Urban Renaissance</i> and forms an important part of the work of English Heritage and the other co-sponsors to secure access for all and sustainable community regeneration.</p> <p>The primary aim is to improve the appearance of London's streets by showing how practical solutions can be achieved to common highway problems and how good practice can become normal practice. The underlying principles are to reduce clutter, co-ordinate design and reinforce local character.</p>		<p>The Local Plan can help to control the appearance of Camden's streets through policies on design, heritage conservation and accessibility.</p>
<p>39.</p>	<p>Regeneration and the historic environment (English Heritage, January 2005)</p>	<p>It sets out how the historic environment can help to achieve better social and economic regeneration. It highlights the advantages of re-using historic buildings in encouraging successful regeneration.</p>	<p>Re-use of existing buildings as opposed to demolition and new build can significantly help achieve sustainable development.</p>	<p>The Local Plan should include policy on encouraging the re-use of historic buildings.</p>

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40.	Guidance on the Setting of Heritage Assets (2011)	Provides the methodology for defining the extent of the setting of a heritage asset, and for determining how development in that setting may impact its historic significance.	Objectives should include reference to the setting of historic assets.	The Local Plan should take into account the need to consider impact of development on the setting of historic assets.
41.	Seeing History in the View (2011)	Presents a method for understanding and assessing heritage significance within views. Relates to any view that is significant in terms of its heritage values and can be used to supplement understanding of views that are already recognised as being important and worth protecting (including those identified in the Mayor's London View Management Framework).	Objectives need to consider heritage and strategic view issues.	Need to consider the impact of development proposals on heritage in a view
42.	Retail Development in Historic Areas (English Heritage, December 2005)	This publication presents case studies that demonstrate how new retail development can be provided successfully and profitably while protecting the historic character of its setting, and introducing buildings that enhance this character. It points out some of the ways in which property investors, retail operators, and local planning authorities can work together to retain and strengthen shopping centres of great character that reinforce the links between their historic function and their future prosperity. It highlights the threat posed to historic centres by large out-of-centre retail developments and the importance of integrating new development with the existing historic landscape.	Heritage issues should be included within objectives.	Take into account links between heritage and retail as appropriate.
43.	The Changing Face of the High Street: Decline and Revival – A	This document takes into consideration the key issues facing historic retailing centres in a changing policy and economic landscape. Their review of planning policy, retail trends and case studies illustrated a number of key messages about the experience of historic centres. These are:	The key issues highlighted in this report should be taken into consideration.	The plan should take account of the messages of best practice as appropriate.

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	Review of Retail and Town Centre Issues in Historic Areas (English Heritage, 2013)	<ul style="list-style-type: none"> - A commitment to town planning and architectural excellence - Adaptability of places - Collaborative design and briefing - Local market research and knowing your customers - Analysis of wider economic conditions and needs - Complementary role of niche and mainstream shopping - Town centre image making, catalyst development and events - Transport and servicing - Property investment and willingness to tackle underlying problems - A proactive approach to development management and policymaking - Managed approach to review of retail frontages - Adapting existing fabric - Building a strong leisure offer - Encouraging residential uses 		
44.	Local green infrastructure: helping communities make the most of their landscape 2011	This document provides key examples of how local green infrastructure initiatives can create a network of essential and desirable services. It provides suggested opportunities for local actions that will contribute to multifunctional green infrastructure networks.	Local green infrastructure should be included in SA objectives.	Opportunities for local green infrastructure should be considered in the local plan.
LONDON WIDE:				
45.	The London Plan: Spatial Development Strategy for Greater London 2011 –	The London Plan sets out an integrated social, economic and environmental framework for the future development of London and deals with planning issues of strategic importance. The objectives for the London Plan are to ensure that London is: 1. A city that meets the challenges of economic and population	SA objectives should reflect and build upon its strategic themes and objectives.	Tensions can exist between targets to build at higher densities and conservation and other design

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	<p>Revised Early Minor Alterations October 2013</p> <p>Draft Further Alterations 2014</p>	<p>in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes; and</p> <p>2. An internationally competitive and successful city with a strong and diverse with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city that is at the leading edge of innovation and research, and which is comfortable with – and makes the most of – its rich heritage and cultural resources.</p> <p>3. A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.</p> <p>4. A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London's built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways, realising their potential for improving Londoners' health, welfare and development.</p> <p>5. A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.</p>		<p>objectives, e.g. quality of public space.</p> <p>One of the key statutory requirements is for local development documents to be in general conformity with the London Plan.</p>

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		<p>6. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling, makes better use of the Thames and supports delivery of all the objectives of this Plan.</p>		
46.	<p>Mayor's Transport Strategy (May 2010)</p>	<p>The Mayor's Transport Strategy sets out his transport vision for London and details how Transport for London and partners will deliver the plan over the next 20 years. The vision is:</p> <p>'London's transport system should excel among those of global cities, providing access to opportunities for all its people and enterprises, achieving the highest environmental standards and leading the world in its approach to tackling urban transport challenges of the 21st century.'</p> <p>Six goals are set out for the implementation of this overarching vision:</p> <ul style="list-style-type: none"> • Support economic development and population growth • Enhance the quality of life for all Londoners • Improve the safety and security of all Londoners • Improve transport opportunities for all Londoners • Reduce transport's contribution to climate change and improve its resilience • Support delivery of the London 2012 Olympic and Paralympic Games and its legacy. 	<p>SA objectives should reflect priorities of the Transport Strategy and translate them, as appropriate, to the local level.</p>	<p>The Strategy's objectives and policies are integrated in the London Plan and should be reflected in the Local Plan.</p>
47.	<p>Clearing the air: The Mayor's Air Quality</p>	<p>Sets out actions to improving London's air quality and includes measures aimed at reducing emissions from transport, homes, workplaces and new developments. The measures in the Strategy, along with natural fleet turnover, will reduce PM10 emissions from</p>	<p>SA objectives should reflect the Mayor's Air Quality Strategy</p>	<p>Have regard to this Strategy and reflect its objectives and</p>

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	<p>Strategy (December 2010)</p>	<p>about 135 tonnes in 2008, to 119 tonnes in 2011, and to 93 tonnes in 2015.</p> <p>The Mayor is proposing further transport policies that will make London's transport network even cleaner and greener. These proposals include:</p> <ul style="list-style-type: none"> • Cleaning up London's bus fleet, taxi and Private Hire Vehicle (PHV) fleet • Including larger vans and minibuses in the Low Emission Zone (LEZ) from January 2012 • Introducing a new NOx standard for the LEZ from 2015. • Reducing emissions from freight vehicles by promoting Delivery and Servicing Plans and freight consolidation facilities. • Working with boroughs to implement targeted action plans at air quality priority locations. • Tackling vehicle idling, better traffic and deploying low emission buses. <p>A package of non-transport policy measures include:</p> <ul style="list-style-type: none"> • Working with boroughs to make better use of the planning process so that new developments are 'air quality neutral or better'. • Updating best practice guidance on reducing dust emissions from construction sites. • Scaling up London's schemes to retrofit homes and workplaces to improve energy efficiency. • Introducing emission standards for new biomass boilers and combined heat and power systems. • Raising public awareness to encourage all Londoners to take action to reduce their emissions, from travel choices to energy efficiency. • Improving information for the most vulnerable Londoners to enable them to reduce the risk to their health from poor air quality. 		<p>policies where appropriate.</p> <p>As traffic is the main source of air pollution in London it is important to consider the Local Plan in influencing transport patterns/ use and encouraging lower emissions practices.</p>
48.	Connecting	The Mayor's Biodiversity Strategy sets out how London's biodiversity	Potential for	The Local Plan

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	with London's Nature: The Mayor's Biodiversity Strategy (GLA 2002)	<p>can be protected and looked after. The most relevant policy will be Policy 5: The Mayor will encourage greening of the built environment and the use of open spaces in ecologically sensitive ways. He will:</p> <ul style="list-style-type: none"> • Encourage greening of new developments and maintenance of wildlife habitat along transport routes • Promote the health benefits of open space. 	constraint/conflict between development proposals and biodiversity – guidance seeks to limit and mitigate against this.	should seek to promote the importance of nature/biodiversity for sustainability.
49.	All London Green Grid, SPG 2012	<p>The aims of the All London Green Grid are:</p> <ul style="list-style-type: none"> • To protect and enhance London's strategic network of green and open natural and cultural spaces, to connect the everyday life of the city to a range of experiences and landscapes, town centres, public transport nodes, the countryside in the urban fringe, the Thames and major employment and residential areas; • To encourage greater use of, and engagement with, London's green infrastructure; popularising key destinations within the network and fostering a greater appreciation of London's natural and cultural landscapes; enhancing visitor facilities and extending and upgrading the walking and cycling networks in between to promote a sense of place and ownership for all who work in, visit and live in London; • To secure a network of high quality, well designed and multifunctional green and open spaces to establish a crucial component of urban infrastructure able to address the environmental challenges of the 21st century – most notably climate change. 	Local green infrastructure should be included in SA objectives.	Opportunities to promote green infrastructure should be promoted in the Local Plan.
50.	The Mayor's Economic Development Strategy for London (May 2010)	Sets out the Mayor's vision for London to be the best big city in the world. To 2031 and beyond London should excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life, and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change.	To reflect these objectives but also to recognise that economic growth objectives can potentially conflict	The Local Plan should ensure economic growth is catered for in Camden.

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		<p>The strategy sets out set five economic objectives:</p> <ul style="list-style-type: none"> • Objective 1: to promote London as the world capital of business, the world's top international visitor destination, and the world's leading international centre of learning and creativity. • Objective 2: to ensure that London has the most competitive business environment in the world. • Objective 3: to make London one of the world's leading low carbon capitals by 2025 and a global leader in carbon finance. • Objective 4: to give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their careers. • Objective 5: to attract the investment in infrastructure and regeneration which London needs, to maximise the benefits from this investment and in particular from the opportunity created by the 2012 Olympic and Paralympic Games and their legacy. 	<p>with other social and environmental objectives.</p>	
51.	Town centres SPG 2014	<p>The SPG includes guidance to:</p> <ul style="list-style-type: none"> • promote the vitality and viability of London's town centres, including neighbourhood and local centres; • support a vibrant mix of uses in town centres including retailing, leisure, culture, tourism, business, social infrastructure and housing; • accommodate growth in demand for new town centre floorspace within centres or in well integrated edge of centre sites; • bring back into use vacant or under-used properties; • promote inclusive access by public transport, shop mobility, walking and cycling to the range of goods and services in town centres; 	<p>SA objectives should reflect the Mayors guidance on Town centres.</p>	<p>The Local Plan should consider draft guidance on Town centres in connection with London Plan policy 2.15.</p>

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		<ul style="list-style-type: none"> • advance the role of town centres in promoting safe, healthy, sustainable neighbourhoods with quality design and public realm, now and for the future; • develop the sense of place and identity of town centres, making them places that people will want to visit; • implement the Strategic Outer London Development Centre concept to enhance the distinct economic strengths of these locations whilst complementing growth in other centres. 		
52.	Green light to clean power: The Mayor's Energy Strategy (GLA February 2004)	<p>The Strategy sets out the Mayor's proposals for change in the way energy is supplied and used within London over the next ten years and beyond, against a long-term vision of a sustainable energy system in London by 2050.</p> <p>Targets include CO₂ emission reductions of 60% from 2000 levels by 2050, one zero-carbon scheme in each Borough by 2010, London to generate 665GWh of electricity and 280GWh of heat, from up to 40,000 renewable energy schemes by 2010.</p> <p>The strategy also sets out how objectives will be met through implementation of the London Plan policies at a local level and expectations on referable schemes.</p>	SA Objectives should reflect the Mayors Energy Strategy and objectives to reduce emissions and use less energy and more renewable energy	The Local Plan should work towards achieving these carbon reduction targets and incorporate these into policies.
53.	Making business sense of waste: The Mayor's business waste strategy for London (November	<p>The overriding aims are to:</p> <ul style="list-style-type: none"> • focus on waste reduction and the more efficient management of resources to reduce the financial and environmental impact of waste • manage as much of London's waste within its boundaries as practicable, by taking a strategic approach to developing new capacity • boost recycling performance and energy generation to deliver environmental and economic benefits to London. 	Effective waste management is integral to achieving sustainability and the Area Plan contribution to achieving this should be considered in the SA.	The Local Plan should include policies to help achieve the aims and policies set out within it.

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	2011)	<p>The Mayor's key targets for the management of business waste are as follows:</p> <ul style="list-style-type: none"> • achieve 70 per cent reuse, recycling and composting of C&I waste by 2020, maintaining these levels to 2031 • achieve 95 per cent reuse, recycling and composting of CDE waste by 2020, maintaining these levels to 2031. <p>The Strategy sets out actions to achieve the following policy aims:</p> <ul style="list-style-type: none"> • Promoting the commercial value of being resource-efficient. • Help businesses overcome the practical issues that make it difficult for them to separate waste for reuse, recycling and composting, and so encourage greater participation by businesses in achieving 70 per cent reuse, recycling and composting of C&I waste by 2020 and beyond. • use the planning system to ensure that the design of new and refurbished buildings provides suitable waste storage and access for collections. • address the development of new waste infrastructure which will help to manage London's business waste within the capital • use the planning regime in London and supporting planning guidance to engage developers, architects and designers in looking for ways to design out waste at source and improve the overall resource efficiency of buildings and infrastructure projects 		
54.	London's wasted resource: The Mayor's municipal waste management strategy	Sets out the aims for London to become a world leader in waste management, making use of innovative techniques and technologies to minimise the impact of waste on our environment and fully exploit its massive economic value. We need to reduce the amount of municipal waste generated by the capital, to increase recycling and composting performance significantly, and to generate energy from rubbish that cannot be reused or recycled in a way that is no more polluting in carbon terms than the energy source it replaces.	Effective waste management is integral to achieving sustainability and the Local Plan contribution to achieving this should be considered in the	The Local Plan should include policies to help achieve the aims and policies set out within it.

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		<p>The Mayor's vision is built upon the waste Hierarchy (in order):</p> <ul style="list-style-type: none"> • Prevention or reduction • Reuse and preparing for re-use • Recycling • Other recovery • Disposal <p>The following objectives and targets aim to support the Mayor's vision:</p> <ol style="list-style-type: none"> 1 Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste 2 Minimise the impact of municipal waste management on our environment and reduce its carbon footprint 3 Unlock the economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of low carbon energy from waste. 4 Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure. <p>The Mayor's key targets for the management of London's municipal waste are as follows:</p> <ol style="list-style-type: none"> 1 To achieve zero municipal waste direct to landfill by 2025. 2 To reduce the amount of household waste produced from 970kg per household in 2009/10 to 790kg per household by 2031. This is equivalent to a 20 per cent reduction per household. 3 To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 20,000 tonnes a year in 2015 and 30,000 tonnes a year in 2031. 4 To recycle or compost at least 45 per cent of municipal waste by 2015, 50 per cent by 2020 and 60 per cent by 2031. 5 To cut London's greenhouse gas emissions through the management 	SA.	

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		<p>of London's municipal waste, achieving annual greenhouse gas emissions savings of approximately:</p> <ul style="list-style-type: none"> - 545,000 tonnes of CO₂eq in 2015 - 770,000 tonnes of CO₂eq in 2020 - One million tonnes of CO₂eq in 2031 <p>6 To generate as much energy as practicable from London's organic and non-recycled waste in a way that is no more polluting in carbon terms than the energy source it is replacing.</p>		
55.	<p>Souder City: The Mayor's Ambient Noise Strategy (GLA March 2004)</p>	<p>The Strategy focuses on reducing noise through better management of transport systems, better town planning and better design of buildings. The key aim is to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practises and technology within a sustainable development framework. Three key issues are:</p> <ul style="list-style-type: none"> • Securing good, noise reducing surfaces on roads • Securing a night aircraft ban across London • Reducing noise through better planning and design of new housing. 	<p>SA objectives should take the Ambient Noise Strategy into account</p>	<p>The Local Plan should be proactive in their approach to ambient noise and reflect the issues and priorities identified in the strategy.</p>

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56.	Cultural Metropolis: The Mayor's cultural strategy – 2012 and beyond (November 2010)	Sets out the following priorities for culture: <ul style="list-style-type: none"> • Maintaining London's position as a world city for culture • Widening the reach to excellence - improve access and participation in high quality arts and cultural activities • Education, skills and careers - Increasing access to cultural education through a strategic approach that helps to coordinate existing activities, build links between cultural institutions, schools and local authorities and raise awareness of the high quality provision on offer. Supporting London's universities in providing a source of innovation and skills for the sector. • Working on the quality of internships and apprenticeships and encouraging volunteering, pathways into the sector will be improved. • Infrastructure, environment and the public realm – need for planning and development to encourage culture to flourish in the capital's venues and public spaces. Highlights importance of cultural and creative industries as factors in regeneration 	SA objectives should take the Cultural Strategy into account	The Local Plan should help to achieve the objectives of the Mayor's Cultural Strategy by applying the policies at a local level.

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57.	Accessible London: Achieving an inclusive environment (GLA 2014)	<p>This Supplementary Planning Guidance (SPG) provides detailed advice and guidance on the policies which promote an inclusive environment in London. The SPG:</p> <ul style="list-style-type: none"> • Provides guidance on the policies contained in the London Plan regarding the promotion of an inclusive and accessible environment • Gives local planning authorities advice on how to implement these policies • Explains the principles of inclusive design and how these principles should be applied in London • Gives designers ideas on where to find good technical advice and guidance. • Provides disabled people, older people and others who experience barriers in the built environment with an understanding of what to expect from planning in London. • Identifies legislation and national planning policy guidance relevant to the promotion of an inclusive environment. • Provides signposts to other relevant London Plan SPG documents and Implementation Guides which impact on the delivery of an inclusive environment. 	SA objectives should take the Accessibility Strategy into account	The advice given in the Mayor's SPG should be followed in developing policies and accessibility should form a strong plan policy.
58.	Housing: supplementary planning guidance 2012	<p>This document provides guidance on how to implement the housing policies in the London Plan 2011.</p> <p>Includes guidance on the supply, quality and mix of housing; affordable housing; social infrastructure and mixed use development. It establishes a focus on quality and design, providing detail on how to carry forward the Mayor's view that "providing good homes for Londoners is not just about numbers.</p>	SA objectives should seek to increase affordability and family housing output, and reflect emphasis on quality of design and housing mix.	Should be used as a key reference in defining Local Plan affordable housing policy/principles. The Local Plan should seek to take forward emphasis on

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				housing quality and mix of unit sizes.
59.	The Mayor's Sustainable Design and Construction: SPG 2014	<p>To support the policies in the London Plan this SPG includes guidance on:</p> <ul style="list-style-type: none"> • Energy efficient design • Meeting the carbon dioxide reduction targets • Decentralised energy • How to off-set carbon dioxide where the targets set out in the London Plan are not met • Retro-fitting measures • Support for monitoring energy use during occupation • An introduction to resilience and demand side response • Air quality neutral • Resilience to flooding • Urban greening • Pollution control • Basements policy and developments • Local food growing 	SA objectives should seek to promote sustainable design and construction.	Sustainable design and construction principles should be taken forward in the Local Plan.
60.	Industrial Capacity SPG (March, 2008)	<p>The objectives of this SPG are to supplement and to provide detailed guidance as to how the broad policies of the London Plan should manage industrial development capacity. In particular, the SPG seeks to:</p> <ul style="list-style-type: none"> • Ensure that sufficient land is available to meet future industrial needs, including those of existing firms; and • Bring genuinely surplus industrial land back into more active uses to meet the wider objectives of the London Plan, especially those to meet housing and other needs. 	SA objectives should consider the need for industrial uses in Camden.	Use as key reference when addressing issues around industrial capacity. Manage pressures for changes from industrial to other land uses in different types of location, including

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				<p>protection of small, locally viable industrial sites.</p> <p>Bringing industrial land into use for other purposes can raise issues of land contamination and this also needs to be addressed by the Local Plan.</p>
61.	London Office Policy Review (GLA 2012)	<p>Assesses supply and demand issues in relation to office development and future prospects for future growth in a range of parts of London. Considers impact of the economic downturn on commercial property. Key points of note include:</p> <ul style="list-style-type: none"> • There will be demand for new office space and for new types of formats of office space and related employment space • The rate of growth in office jobs 2011-36 is forecast to be half that prevailed over the last two decades • Spatial policy should play the long game and provide a flexible framework within which Opportunity Areas and mega schemes can evolve and respond to changing market conditions. • London's new villages and access to rapid and reliable public transport infrastructure. • A key strategic challenge for spatial policy will be to create the flexibility to respond to changes in the office market, while creating the certainty to attract investors 	SA objectives should consider these findings.	The Local Plan should consider these findings and implications in identifying priority uses in conjunction with local policies.
62.	Shaping	This document updates and replaces the Mayor's SPG on Providing for	SA objectives should	The Local Plan

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	<p>neighbourhoods – play and informal recreation SPG 2012</p>	<p>Children and Young People’s Play and Informal Recreation published in 2008.</p> <p>It provides benchmark standards that are flexible enough to meet the varying needs of children and young people across London and should be used as a reference guide for boroughs in the development of their local standards.</p> <p>This guidance sets out responsibilities of Local Authorities, Developers and Consultants in addition to providing guidance to neighbourhood forums in shaping their neighbourhood plans. Local authorities have the responsibility of ensuring robust play strategies and establishing the overall context for implementation of the Supplementary Planning Guidance, as well as detailed roles in determining requirements for specific sites.</p>	<p>seek to protect and increase play and informal recreation.</p>	<p>should seek to protect and increase play and informal recreation space with robust play strategies. This is particularly important in areas of deprivation in Camden.</p>
63.	<p>Shaping neighbourhoods: character and context 2014</p>	<p>The objectives of this SPG are to provide:</p> <ul style="list-style-type: none"> • specific guidance on the attributes of character and context in London (physical, cultural, social, economic, perceptions and experience); • information on resources that inform an understanding of character and context in London; • an analysis of the interrelationships between different aspects of character, and how it can be articulated and presented to others; • examples of good practice in how an understanding of character and context can be used to help manage change in a way that sustains and enhances the positive attributes of a place. 	<p>SA objectives should seek to ensure that character and context are important factors in planning for neighbourhoods.</p>	<p>The Local Plan should seek to ensure that the physical attributes of character and context are considered.</p>

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64.	Rapid Health Impact Assessment Tool, Healthy Urban Development Unit, 2013	Based on Camden checklist that assesses whether health has been considered within new developments. Focuses on housing, transport, physical activity, construction impacts, crime, employment, social capital and cohesion.	SA objectives should consider the importance of health in decision making.	The Local Plan should include policies to ensure that health is considered in decision making of planning applications.
65.	Better Environment, Better Health. A GLA guide for London's Boroughs, London Borough of Camden 2013	The guide focuses on seven environmental issues and their relationship to health: green spaces; active travel and transport; surface water flood risk; air quality; healthy food; fuel poverty; and overheating.	SA objectives should consider the links between the environment and health.	The Local Plan should include and link up with policies on the environment and well-being of Camden.
66.	Geodiversity of London (draft), July 2008	<p>The draft report provides advice that demonstrates how the policy aims set out in the London Plan can be achieved. The report:</p> <ul style="list-style-type: none"> • sets out the geological heritage of London; • identifies strategically important features that are found in open spaces that are recommended for protection; • explains in detail how the regionally and locally important sites were selected and assesses the quality of the sites; • recommends regionally important sites to boroughs for identification in Local Development Documents; • identifies potential locally important sites to boroughs to consider for identification in Local Development Documents; and • provides advice to the boroughs on implementing the aims of protecting and promoting geodiversity. 	SA objectives should reflect the importance of protecting and promoting geodiversity.	Local Plan should include reference to the protection and promotion of Camden's geodiversity.

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67.	Planning and Equality and Diversity in London (October 2007)	<p>This SPG:</p> <ul style="list-style-type: none"> • provides guidance to boroughs, partners and developers on the implementation of policies in the London Plan which relate to equalities issues and addressing the needs of London's diverse communities; • sets out some of the tools for promoting equality and diversity in planning processes; • highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination in the planning context; • sets out overarching principles and the key spatial issues for planning for equality; and • examines in greater detail the spatial needs of London's diverse communities and identifies how spatial planning can be used to try and address these. 	SA objectives should reflect the equality and diversity issues contained within the SPG.	Local Plan should include policies which relate to equality and diversity.
68.	London View Management Framework SPG (March 2012)	The London View Management Framework SPG provides guidance on the policies in the London Plan for the protection of strategically important views in London. The SPG explains how the views designated by the Mayor and listed in the London Plan are to be managed, and replaces the previous 2007 SPG.	SA objectives should reflect the importance of protecting the setting of important buildings.	Local plan policies should reflect the established strategically important view corridors.
69.	Mayors Climate Change Adaptation Strategy (2010)	Takes a risk-based approach to understanding the climate impacts today, and how these are expected to change through the 21 st century. Provides a framework to identify and prioritise the key climate risks and then to identify who is best placed to deliver actions to reduce or manage these risks	SA objectives should reflect the need to adapt to climate change.	Local Plan policies should reflect and where appropriate take forward actions and principles established in the draft strategy.
70.	Environment Agency River	The Thames RBMP seeks to implement the Water Framework Directive in the UK to improve the ecological status of waterbodies in the Thames	SA objectives should reflect the need to	The Local Plan should focus on

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	Basin Management Plan, Thames River Basin District (2009)	river basin district whilst also ensuring there is no deterioration in water quality. The Grand Union Canal and Regents Canal are both identified in the Thames RBMP as artificial waterbodies that are currently failing to reach good ecological potential – their current status is ‘moderate.’ It is recognised that the borough sits within an overall catchment area and activities and development taking place in Camden will also have impacts elsewhere in the catchment.	improve water quality and reduce run-off.	improving water quality and promote sustainable urban drainage systems to reduce urban run-off and pollution from combined sewerage outfalls, and seek to enhance the ecology of watercourses.
LOCAL:				
71.	The Camden Plan 2012-2017	Sets out outcomes and practices under the following five strategic objectives: 1. Providing democratic and strategic leadership fit for changing times 2. Developing new solutions with partners to reduce inequality 3. Creating conditions for and harnessing the benefits of economic growth 4. Investing in our communities to ensure sustainable neighbourhoods 5. Delivering value for money services by getting it ‘right first time’	Include the relevant objectives and proposals in the SA Framework objectives and criteria	Strong links already exist between the Core Strategy and the Community Strategy. Local Plan should reflect and help to implement the objectives of the Camden Plan.
72.	Camden Core Strategy and Development Policies	The Core Strategy sets out the key elements of the Council’s planning vision and strategy for the borough. It is the central part of the Local Development Framework (LDF). The vision of the Core Strategy is that “Camden will be a borough of opportunity”.	The SA objectives of the Local Plan should be informed by the policies and	The Local Plan is an update of these documents to deliver sustainable

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	documents LDF 2010	<p>Camden Development Policies contributes towards delivering the Council's Core Strategy by setting out detailed planning policies that the LBC will use when determining applications for planning permission in the borough to achieve the vision and objectives of the Core Strategy. The plans are grouped under the following areas:</p> <ul style="list-style-type: none"> • Location and management of Camden's growth; • Meeting Camden's needs – Providing homes, jobs and facilities; • Sustainable and attractive Camden • Tackling climate change and improving and protecting Camden's environment and quality of life. 	SA considerations of these plan documents.	growth, sustainable communities and other local priorities.
73.	Camden Site Allocations 2013	Sets out guidance for key development sites across the borough.	SA objectives should be informed by the guidance outlined within this document.	The Local Plan should include reference to the guidance set out in the Site Allocations, where appropriate.
74.	Camden Planning Guidance SPD (2011)	<p>Camden Planning Guidance provides advice and information on how the LBC applies its planning policies. The guidance is broken down to cover 8 different areas:</p> <ul style="list-style-type: none"> • Design • Housing • Sustainability • Basements and lightwells • Town centres, retail and employment • Amenity • Transport • Planning obligations <p>These guidance documents support the policies in the Local</p>	SA objectives should be informed by the guidance outlined within this document.	The Local Plan should include reference to supplementary guidance where appropriate.

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		Development Framework (LDF and are consistent with the Core Strategy).		
75.	Euston Area Plan – draft July 2013	<p>This draft plan is being prepared for the area around Euston Station to help shape change in the area up to 2031. It is being jointly prepared by Camden Council, the GLA and TfL.</p> <p>The ten objectives of the plan are set out below:</p> <ul style="list-style-type: none"> • Prioritising local peoples needs; • Securing excellent design; • Making the best use of new space above the station and tracks and opportunities for regeneration in the wider area; • New streets above the station and tracks; • Boosting the local economy by reinforcing existing economic assets and businesses; • Creating sustainable development; • Improving the environment along the Euston Road; • Promoting sustainable travel; • Enhancing existing public transport; • Planning for future public transport. 	SA objectives should reflect upon these objectives.	The Local Plan should refer to the objectives of the plan where appropriate.
76.	Bloomsbury - A Strategic Vision (Farrells)	<p>Sets out a strategic vision for the Bloomsbury area, including the following key proposals:</p> <ul style="list-style-type: none"> • Reinventing Bloomsbury's squares • Improvements to the spaces around the university buildings and improving the connections between them • Improving connectivity to and the visibility of the British Museum and promoting all Bloomsbury's cultural assets • Introducing two-way traffic movement to Tottenham Court Road and Gower Street • Improving pedestrian accessibility through the Euston Road 	SA objectives should be consistent with the Strategic vision objectives	The Local Plan should reflect and incorporate these aims and proposals where appropriate.

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		<p>Underpass Project</p> <ul style="list-style-type: none"> • New crossings from Euston Square to Endsleigh Gardens • Improving pedestrian movement and way finding • Improving the quality of the public realm through the use of a design manual 		
77.	Camden Conservation Area Appraisal and Management Strategies	The conservation area appraisals and management strategies define the special character of a conservation area and set out our approach for its preservation and enhancement.	SA objectives should be informed by the guidance outlined within this document.	Guidance within the Local Plan should be consistent with the findings and recommendations of this document.
78.	Camden Strategic Flood Risk Assessment (SFRA), 2014	<p>The Camden SFRA 2014 will be utilised to inform the Local Plan, as outlined in the NPPF and associated planning guidance.</p> <p>The SFRA identified areas of flooding risk and provided guidance on the management of residual flood risk and surface water drainage through the use of Sustainable urban Drainage Systems (SuDS) and feasibility of SuDS in Camden.</p>	Take flood risk into account in developing objectives and should incorporate or reflect regional or strategic flood risk assessments.	The Local Plan should take a risk-based approach and consider flood risk in accordance with guidance and consider ways to promote sustainable drainage systems alongside the more sustainable use of water.
79.	Preliminary Flood Risk Assessment: Drain London - London	Summarises the Preliminary Flood Risk Assessment undertaken for the London Borough of Camden. has not identified any past floods that are considered to have had significant harmful consequences but finds that future flood risk is likely to be high in the borough	Take flood risk into account in developing objectives	The Local Plan should take a risk-based approach and consider flood risk in accordance

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	Borough of Camden 2011			with guidance and consider ways to promote sustainable drainage systems alongside the more sustainable use of water.
80.	Camden Surface Water Flood Risk Management Plan 2013	This is a non-statutory document produced to outline our approach to the management of surface water flood risk. This is part of the Drain London project identifying surface water risk across Greater London.	Take flood risk into account in developing objectives	The Local Plan should take a risk-based approach and consider flood risk in accordance with guidance and consider ways to promote sustainable drainage systems alongside the more sustainable use of water.
81.	Flood risk management strategy 2013	<p>The Council has a new role as the Lead Local Flood Authority (LLFA) for the borough. This strategy states what actions the Council and other key stakeholders will take to manage flood risk in Camden.</p> <p>The strategy has four key objectives:</p> <ol style="list-style-type: none"> 1. To understand and explain the level of risk affecting the residents and businesses of Camden 2. To provide an action plan for areas at particular risk from surface water flooding 	Take flood risk into account in developing objectives	The Local Plan should take a risk-based approach and consider flood risk in accordance with strategy and consider ways to promote sustainable drainage systems

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		<p>3. To highlight the actions that all partners, businesses and residents in Camden should be taking to manage flood risk</p> <p>4. To take a sustainable and holistic approach to flood management, seeking to deliver wider environmental and social benefits.</p>		<p>alongside the more sustainable use of water.</p>
82.	<p>London Borough of Camden Annual Monitoring Report – 2012/13</p>	<p>The Annual Monitoring Report contains information on key indicators regarding the implementation of Camden's planning policy documents. The document reports on these indicators and the extent to which planning policies are being achieved. The document records key statistics on</p> <ul style="list-style-type: none"> • Housing • Sustainable Development • Built and Natural environment • Transport • Town centres, retail, community and leisure • Economic activities 	<p>SA objectives and baseline reports should be informed by the information presented within this report.</p>	<p>This information was used to inform the Local Plan and thus has been incorporated into the document. The Local Plan should ensure that its policies recommend a course of action that can be monitored via this report.</p>
83.	<p>Camden Housing Strategy 2011-2016</p>	<p>This Strategy presents Camden's ambitions for housing. It sets out a direction for the next five years and beyond targeting action on key local housing issues. Sets out the following priorities:</p> <ul style="list-style-type: none"> • Managing expectations • The right people in the right homes – getting the most out of existing homes • Securing a supply of new housing that meets a range of needs – a more proactive role for the Council in development • Securing specialist support and accommodation for groups with 	<p>SA objectives should be consistent with the strategy</p> <p>Include local housing targets and sustainable communities criteria in the SA framework</p>	<p>The Local Plan should take the objectives of the strategy into account and where appropriate ensure they set out how planning can help achieve these</p>

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		<ul style="list-style-type: none"> • special needs - everyone on a pathway to suitable housing • Well-managed homes – promoting professional standards and value for money • Well-maintained, safer, greener homes – improving living conditions and energy efficiency 		
84.	Camden Housing Need Study Update 2008	<p>The study represents an update of the previous 2004 study, and the key implications are:</p> <ul style="list-style-type: none"> • The evidence supports the Council's current target of 50% affordable housing; • A target split of between be 30% social rented accommodation and 20% intermediate housing could be supported; • Affordable housing of all dwelling sizes is required. Within the affordable tenures, it is suggested that future provision of social rented housing should be skewed towards larger (three or more bedroom) dwellings; • Provision of intermediate housing of all sizes could theoretically be justified, although the finding that intermediate housing priced towards the upper end of the intermediate range is most affordable to those requiring smaller units should be borne in mind; and • The profile of market housing provided should be skewed towards two, three and four bedroom units. 	SA objectives should be consistent with the study.	Policies within the Local Plan should be consistent with the findings of the study.
85.	Camden Social Inclusion Strategy (LB Camden 2003)	<p>The strategy identifies short and medium term priority areas that the Council with its partners need to work on over a 2–3 year period. It was produced to complement other key strategies including the Neighbourhood Renewal Strategy and Race Equality Scheme. An action plan has been formulated around 3 priority areas within the strategy:</p> <ul style="list-style-type: none"> • Tackling child poverty through work with children, young people 	SA objectives should be consistent with the strategy	The Local Plan should help to improve the situation in these three priority areas.

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		<p>and their families</p> <ul style="list-style-type: none"> • Increasing corporate training and employment opportunities for excluded groups • Improving access to services <p>This strategy has now been integrated into the Equality Plan 2005-2006.</p>		
86.	<p>Tackling Inequality: Camden's Equality Scheme 2005-2008 and Action Plan (LB Camden 2005) & Task force report 2013</p>	<p>This includes the previous Race Equality Scheme and revised Equality Policy and addresses six equality dimensions:</p> <ul style="list-style-type: none"> • Race/ethnicity (including refugees/asylum seekers and other migrants) • Gender • Disability • Age • Religion/belief • Sexual orientation (Lesbian, Gay, Bisexual and Transgender) <p>It incorporates an action plan setting out a broad range of cross cutting and more specific objectives, actions and targets covering issues such as social cohesion, safety, and accessibility across the range of equality dimensions.</p>	SA objectives should be consistent with the plan	Local Plan should be consistent with Equality Scheme (including being subject to EQIA) and should actively seek to reduce inequality.
87.	<p>Green Action for Change – Camden's environmental sustainability plan (2011-2020)</p>	<p>Sets out the following aspiration:</p> <ul style="list-style-type: none"> • To achieve a better quality of life for ourselves and future generations • To nurture all our natural resources and reduce carbon emissions and waste • To mobilise people to take action to change their lifestyles and behaviour. <p>This is supported by the following council pledges:</p> <ul style="list-style-type: none"> • Lead by example in reducing the environmental impacts from our own operations 	SA objectives should be consistent with the Action plan objectives	The Local Plan should be consistent with the plan and reflect the key aims and seek to reduce carbon emissions.

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		<ul style="list-style-type: none"> • Create the foundations for success through our planning policy, support for green infrastructure and supporting the local green economy • Attract the necessary investment for green infrastructure, buildings and transport • Engage and empower communities, individuals, schools and businesses to take responsibility for their own environmental impacts • Work with our local, regional and national partners in the public, private and voluntary sector. <p>Key goals:</p> <ul style="list-style-type: none"> • Reduce carbon emissions from 2005 levels by 10% by 2012; and by 40% by 2020. • Contribute to Government targets to reduce carbon emissions by 80% by 2050 from 1990 levels. • Contribute to a North London recycling and composting rate of 50% by 2020 from 30% (Camden) levels in 2009-10. • Reduce residual household waste from 2008/09 levels by 3% by 2012 and by 15% by 2020. 		
88.	Camden Air Quality Action Plan 2013 - 2015	<p>The plan brings together a variety of measures to help reduce particulate matter and nitrogen oxides emissions from various emission sources in the borough.</p> <p>Long term trends reveal that Camden continues to breach the annual mean air quality objective for nitrogen dioxide. Improving air quality will continue to be challenging, especially at the most heavily trafficked part of the north and south of the borough.</p> <p>The Plan includes five areas for action:</p>	SA objectives should seek to enhance air quality wherever possible.	Local Plan should contain policies which reflect the findings of the report and seek to improve air quality in the borough.

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		<ul style="list-style-type: none"> • Reducing transport emissions. • Reducing emissions associated with new development. • Reducing emissions from gas boilers and industrial processes. • Air quality awareness raising initiatives. • Lobbying and partnership working. 		
89.	Creative and cultural industries in Camden: A research report and action plan	<p>Provides evidence of the contribution made by the creative and cultural industries (CCI) sector to Camden's prosperity and to assess what steps might be needed to assist businesses in the sector to respond to the current economic climate.</p> <p>Set outs a range of actions for Camden to consider, under the following headings:</p> <ul style="list-style-type: none"> • Opportunities for local places Priorities: Affordable workspace, reducing the cost of business rates • Opportunities for local people, young people Priorities: Building opportunities with employers • Opportunities for independent practitioners, freelancers etc Priorities: Improving access to training and professional supply chain networks • Opportunities for local businesses: micro, SME and large Priorities: Building business to business networks with growth companies • Improving understanding Priorities: Better intelligence about Camden's knowledge intensive cluster 	SA objectives should be consistent with the strategy objectives	The Local Plan should help to achieve these aims through the planning system.
90.	Camden Transport Strategy (LIP)	The Camden Transport Strategy and Local Implementation Plan is a five-year transport strategy required by the Mayor for London. It sets out the future direction for transport in Camden and describes the context of	SA objectives should be consistent with the Transport	The Local Plan should be consistent with the

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	<p>2011-2031</p>	<p>traffic and transport in the borough, the challenges Camden face and how, through the objectives and actions outlined in the Strategy, Camden proposes to address them. This document also forms the basis of funding requests to Transport for London (TfL) for borough transport schemes. The strategy includes the following objectives:</p> <ul style="list-style-type: none"> • Objective 1 - Reduce motor traffic and vehicle emissions to improve air quality, mitigate climate change and contribute to making Camden a 'low carbon and low waste borough' • Objective 2 - Encourage healthy and sustainable travel choices by prioritising walking, cycling and public transport in Camden • Objective 3 – Improve road safety and personal security for people travelling in Camden • Objective 4 – Effectively manage the road network to manage congestion, improve reliability and ensure the efficient movement of goods and people • Objective 5 – Develop and maintain high quality, accessible public streets and spaces and recognise that streets are about more than movement • Objective 6 – Ensure the transport system supports Camden's sustainable growth and regeneration as well as enhancing economic and community development • Objective 7 – Ensure the transport systems supports access to local services and facilities, reduces <ul style="list-style-type: none"> • inequalities in transport and increases social inclusion • Objective 8 – To ensure that the provision of parking is fair and proportionate by considering the <ul style="list-style-type: none"> • needs of all users, whilst also encouraging sustainable travel choices • Objective 9 - Support the delivery of a successful London 2012 	<p>Strategy/ LIP objectives</p>	<p>LIP as it relates to spatial planning matters and where possible, should seek to achieve the aims of the LIP through the planning process.</p>

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		Olympic and Paralympic Games		
91.	Camden's Noise Strategy (LB Camden 2002)	<p>The aims of the Strategy are:</p> <ul style="list-style-type: none"> o To reduce people's exposure to noise as much as possible, using the ALARA principle – As low AS Reasonably Achievable: o To give priority to those experiencing highest levels of noise or at most anti-social times o To achieve Noise Directive/WHO guidelines as minimum standards for exposure o To encourage noise prevention wherever possible rather than trying to cure problems that have already occurred o To raise awareness of noise issues amongst local residents and businesses o In parts of the Borough where noise levels are low, to preserve the tranquillity of such area; o To reduce noise levels in open spaces to minimise effects of noise on wildlife. <p>It contains a number of policies and highlights how planning policies can be developed and used to control the impacts of noise and also covers the impacts of noise from commercial activities, construction, traffic and railways amongst others. However, no specific targets are included.</p>	SA objectives should be consistent with the strategy objectives	The Local Plan should take into account the aim and policies of the Noise Strategy and where possible include policies to help achieve these aims.
92.	Camden Biodiversity Action Plan 2013	<p>The BAP contains 3x action plans which cover:</p> <ul style="list-style-type: none"> - Access to nature <p>Here, we focus on the actions that will encourage our residents to access the natural environment for the range of health, wellbeing, social and community benefits that it can deliver.</p> <ul style="list-style-type: none"> - Built environment <p>The current planning policy environment requires that developers consider biodiversity in their proposals and contribute to an overall</p>	Changes in priority species and habitats could for a sustainability indicator to measure whether the Local Plan is helping to protect and enhance biodiversity.	The Local Plan should seek to protect and enhance the biodiversity the borough, and particularly priority species and habitats.

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		<p>biodiversity enhancement. This BAP seeks to work with existing planning policy (see Table 1) and provide further direction on what the priorities are in Camden and how enhancements can be delivered.</p> <p>- Open spaces and natural habitats This section of the BAP focuses on looking after our open spaces so that they provide opportunities for wildlife to thrive. This means managing existing natural spaces, such as woodlands, the canal and heath, to the best of our ability. It also means making formal and amenity spaces more wildlife friendly by looking at the landscaping schemes we use and making the right decisions about the projects that we run.</p>		
93.	Camden's Corporate Sustainable Design and Construction Policy (LBC 2007)	The aim of this policy is to improve the environmental performance of Council-controlled building stock, construction and maintenance where appropriate and dependant on affordability and the extent of the Council's control.	None.	While the policy relates only to development owned by the Council, it is possible that the principles and aims set out in this document could be applied through the Local Plan to private developments in the borough.
94.	Building Schools for the Future – Indicative	The Strategy is a single coherent strategy covering all key aspects of secondary educational transformation and the Every Child Matters agenda. Through of the Building Schools for the Future (BFS) programme the Council aims that the high standards are achieved by all	The strategy states that the BFS programme presents major opportunities	The strategy has set out some baseline information that is

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	Strategy for Change Part 1 (LBC 2007)	and that the gap is closed between levels of attainment of different groups, specifically that from 2013 at the age of 16 75% achieve level 2 (5 A*-C GCSE equivalent) up from 55% in 2006, that 90% achieve at least level 1 and 95% achieve at least entry level, so closing the gap of groups currently performing below their more advantaged peers; vulnerable groups, including young people with learning difficulties and disabilities achieve highly when compared to statistical neighbours; there is improved access, curriculum offer and challenge for all learners and improved choice of school for all learners and their parents and carers.	for the Council to address sustainability issues and that the use of sustainable construction and materials and consideration of energy consumption will form part of the programme.	useful in informing how the Local Plan should contribute to education provision in the borough.
95.	Change for children and families, delivering the Camden Plan 2012	<p>A key priority of the Plan is to ensure that Camden is a place where every child and young person has a chance to succeed and where nobody gets left behind.</p> <p>The framework for action includes:</p> <ul style="list-style-type: none"> • Integration, • Creating active partnerships, • Involving children, young people and families in decision making. 	Take into account importance of providing community facilities, promoting healthy lifestyles and preventing anti social in developing criteria and objectives	The Local Plan needs to help achieve these key priorities through the approach taken to new development and protection and enhancement of education facilities.
96.	An Open Space Strategy for Camden 2006-2011	This Strategy provides a framework for action so as to provide and manage accessible, attractive, clean, safe and welcoming open spaces for everyone. The strategy provides and assessment of open space need and sets out a series of commitments and an action plan for the future.	SA objectives should reflect the open space issues highlighted by the strategy.	Local Plan should contain policies which seek to protect and enhance open spaces in Camden.
97.	Camden Open Space, Sport	This study is an update of the 2008 Open Space, Sport and Recreation Study, which was used to develop Open Space policies for the Core	SA objectives should reflect the key	Local Plan should contain policies

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	and Recreation Study Review; Atkins; 2014	Strategy and Development Policies Documents of the LDF. The 2014 update will be used to develop preferred options for the Local Plan.	findings of the study.	which are consistent with the study.
98.	Camden Statement of Licensing Policy 2011	<p>The Statement sets out the Council's approach to licensing policy along with a series of licensing objectives. Policies seek to promote the following four licensing objectives:</p> <ul style="list-style-type: none"> • prevention of crime and disorder • public safety • prevention of public nuisance • protection of children from harm 	SA objectives should reflect the licensing objectives within the statement, regarding public safety and public nuisance.	Local Plan should contain policies which are consistent with the objectives of the licensing statement.
99.	Let's Talk Rubbish – Camden Waste Strategy 2007-2010	<p>The strategy aims to reduce the overall amount of waste produced in the borough, maximise the amount of waste recycled, and increase the spend on 'green' purchases. The strategy includes a number of targets, including:</p> <ul style="list-style-type: none"> • To reduce household waste collected per household by 5% by 2010; • 35% of household waste in Camden to be recycled by 2010; • 10% of commercial waste collected by the authority to be recycled by 2010; • 25% of all Camden businesses to sign up to the Mayor's Green Procurement Code by 2010; and • 30% of all council purchases to be made from recycled materials by 2010. 	SA objectives should reflect the targets for reducing waste and increasing recycling, which are set out in the strategy.	Local Plan should contain policies which are consistent with the approach contained within the strategy.
100.	Delivering a Low Carbon Camden – Carbon Reduction Scenarios to	<p>The aims of this study are to:</p> <ul style="list-style-type: none"> • Calculate the current annual CO2 emissions from Camden to provide a baseline against which reductions will be measured; • Compile a list of technologies and measures that apply to the building and transport sectors and that can be used to reduce CO2 emissions; 	SA objectives should reflect the carbon reduction opportunities presented by the report.	Local Plan policies should encourage measures which support the objectives of the study and seek to

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	2050; SEA-Renue; 2007	<ul style="list-style-type: none"> • Define constraints on the technologies and measures such as maximum installed capacities; • Analyse various scenarios by using a model to alter the mix of the different technologies and measures to meet various CO2 reduction targets; • Analyse the financial and environmental implications of the proposed scenarios; and • Use the results of the scenario modelling to put forward recommendations for a CO2 reduction target for the borough and suggest actions to implement the strategies envisaged by the scenarios. 		reduce carbon emissions.
101.	Camden Employment Land Review 2008	<p>The study was commissioned by Camden Council to assess the future demand for employment land, compare it with the land supply provided under current planning policies and make policy recommendations accordingly. The study draws a number of key conclusions:</p> <ul style="list-style-type: none"> • The Council should seek to protect existing offices in the Central London Area and do all it can to encourage the development of new offices there; • In Camden Town development of new office stock should be encouraged and existing offices should be protected against transfer to residential uses; • The Council should protect existing industrial/warehousing sites and areas which remain fit for market; • The Council should seek to create opportunities for small-scale industrial development 	SA objectives should reflect the need for employment spaces in the borough.	Local Plan policies should be consistent with the recommendations of the study.
102.	Camden Employment Land Review 2014	<p>The study was commissioned by Camden Council to assess the future demand for employment land, compare it with the land supply provided under current planning policies and make policy recommendations accordingly.</p>	SA objectives should reflect the need for employment spaces in the borough.	Local Plan policies should be consistent with the recommendations of the study.

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103.	Camden Retail and Town Centre Study 2013 - GVA	<p>Planning policy recommendations:</p> <ul style="list-style-type: none"> • The current retail hierarchy in Camden appears to be reasonable. If the future proposals for Euston area involve the provision of significant floorspace, it may be appropriate to designate Euston as a town centre. This would require a full assessment of impact. • Recommend that following crossrail development in 2018 the central London frontage in this location is reviewed. • In general the defined core and secondary frontages are considered appropriate. It will be important for centres with high vacancy levels in secondary areas that the specific thresholds for maximum levels of A3/4/5 uses are not overly restrictive. • Define primary shopping areas. • None of the town centres have a deficiency in eating and drinking provision. <p>The study has identified significant capacity for convenience goods over the plan period. Significant capacity for comparison goods was also identified in the borough between 2018-2031. The report recommends that the Council:</p> <ul style="list-style-type: none"> • directs significant retail development towards central London frontages, the growth areas and other town centres; and • undertake a review of suitable sites within these locations to accommodate future retail needs. 	SA Objectives should reflect the findings of the study in terms of retail floorspace provision.	Local Plan should provide a consistent approach to encouraging vitality and viability and protecting and enhancing retail floorspace.
104.	Camden Local Economic Assessment, 2011	<p>The assessment states that the principal drivers for change in Camden are:</p> <p>Economic growth and agglomeration Regeneration and development Population growth and demand for housing Demand for higher (and lower) level skills, and</p>	The SA objectives should take account of the recommendations in the assessment.	The Local Plan should seek to address the issues raised in the assessment.

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		<p>Reduction in public expenditure and new government policy.</p> <p>The assessment identifies that some groups are more likely to be affected by others such as young people, low income families, ethnic minorities and residents with mental health problems.</p> <p>The role of planning in supporting young people, improving skills, mainstreaming employability support and reducing health inequalities will be to:</p> <ul style="list-style-type: none"> - maximise community benefit from new developments through planning frameworks and s106 - continue to maximise the supply of affordable housing - consider economic health of local areas and local labour market in place plans, and - work with the business community to support local employment and boost the impact of CSR programmes to help tackle unemployment and deprivation. 		
105.	Camden Joint Strategic Needs Assessment, 2013	<p>The JSNA is an on-going process by which local authorities, clinical commissioning groups and other public sector partners jointly describe the current and future health and wellbeing needs of its local population and identify priorities for action. The JSNA is not just about health and personal social care services; it is also about the wider aspects of health including poverty, employment, education, public safety, housing and the environment.</p>	<p>The SA objectives should take account of the issues raised in the JSNA.</p>	<p>The Local Plan should seek to address the issues in the JSNA.</p>

Appendix 2: Baseline information

(for maps and figures refer to Appendix 4)

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
Transport and Traffic				
<p>Location of major transport demand generating developments –</p> <p>Major applications plotted against PTAL</p> <p><i>AMR 2012/13</i></p>	<p>Of the 24 significant travel demand generating developments permitted in the borough in 2012/13, 92% (22) were located in an area with a PTAL rating of 5 or more.</p> <p>However public transport accessibility</p> <p>Identify major developments located within Town Centres, high PTAL etc</p>	<p>NPPF & London Plan policy on sustainable development</p> <p>Reduce the current proportion of residents' trips made by car and motorcycle from an average of 19% across 2006/07 – 2008/09 to an average of 17% across 2016/17 – 2018/19.</p>	<p>London Plan and Camden LDF policy promotes development in the borough's growth areas and other highly accessible locations.</p>	<p>Significant travel-demand generating developments can cause major problems when located away from town centres, primary shopping frontages and/or good public transport links. This can lead to increased dependency on private vehicle transport and the associated problems this can cause (e.g. parking and traffic</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				congestion). Further, allowing such developments outside of accessible locations can set unacceptable precedents and damage town centre vitality.
<p>% reduction in number of people killed or seriously injured in road accidents.</p> <p><i>Camden Transport Strategy 2011</i></p>	<p>Between 2007 and 2011 number of people killed or seriously injured fell from 123 to 120.</p>	<p>Reduce the total number of people killed and seriously injured by 25% from 123 in 2007 - 2009 to 92 by 2019/20.</p>	<p>The average number of people Killed and Seriously Injured (KSI) each year from 2007 to 2009 was 123. The target is to reduce KSIs to 109 in 2014 and then to 92 in 2020. Data for London has shown a levelling out in the reduction of KSI casualties since 2004.</p>	<p>Planning can only have limited control over the number of road accidents. However, it is important that new developments do not impair road safety.</p>
<p>Number of agreements signed for car-free or car-capped housing</p> <p><i>AMR 2012/13</i></p>	<p>In 2012/2013 139 completed residential units were car-free (24% of all those completed).</p>	<p>Increase the proportion housing in the borough that is car-free or car-capped.</p>	<p>There is likely to be an increase in the number of car-free and car-capped housing, as on-street parking spaces are at a premium, and as developments are located near good public transport links, there will be greater alternatives to private car ownership.</p>	<p>It is important that opportunities to seek car-free and/or car-capped housing are taken in order to reduce traffic congestion and to improve</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				air quality through the reduction of carbon and other emissions caused by motor vehicles.
<p>% reduction in car and motor vehicle traffic flows through the borough</p> <p><i>LBC Screenline Surveys 2006</i></p> <p><i>AMR 2012/13</i></p>	<p>In 2012/13 445m vehicle kms recorded – down from 466m in 2011/12. See figure 2.</p>	<p>Reduce the current proportion of residents' trips made by car and motorcycle from an average of 19% across 2006/07 – 2008/09 to an average of 17% across 2016/17 – 2018/19.</p>	<p>Camden has been very successful to date in reducing the amount of traffic using the borough's roads.</p> <p>Traffic in Camden has decreased significantly since 1993 in contrast to national and regional trends. In the 10 year period to 2012 traffic floor in Camden reduced 25%.</p>	<p>It is important that this trend continues as reducing the amount of traffic on Camden's roads will also help to improve air quality through reducing carbon and other emissions caused by cars and motor vehicles.</p>
<p>% increase in proportion of resident trips by walking</p> <p><i>Camden Transport Strategy, 2011</i></p>	<p>Between 2006 – 2011 the proportion of resident trips by walking rose from 38.9% to 39.1%. See figure 1.</p>	<p>Increase the proportion of residents' trips by walking from 38.9% in 2006/07 - 2008/09 to 40.9% by 2019/20.</p>	<p>The current proportion of walking trips by residents puts the borough in the top quartile London-wide. Only the City of Westminster and the City of London has a higher proportion of walking trips.</p>	<p>Modal shift from motor vehicles to walking and cycling will reduce the amount of traffic on Camden roads and help to improve air quality through</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				reducing carbon and other emissions caused by motor vehicles.
% increase in cycling traffic <i>LBC Screenline Surveys</i> <i>AMR 2012/13</i>	2012/13 has seen a flat lining in the modal shift towards cycling, with its modal share dropping from 16% to 15%. See figure 1.	Increase cycling as a proportion of traffic flows to 25% in 2019/2020.	For the period 2006-2012 cycle flows increased from 9% to 16% as a proportion of all traffic, representing a 70% increase	Modal shift from motor vehicles to walking and cycling will reduce the amount of traffic on Camden's roads and help to improve air quality through reducing carbon and other emissions caused by motor vehicles
% increase in bus traffic <i>LBC Screenline Surveys</i> <i>AMR 2012/13</i>	2012/13 has seen bus/coach travel remain at 4% of the total mode share. See figure 1.	None identified.	Bus traffic on Camden's roads has steadily increased since 1996. Modal share has remained at 4% since 2007.	There is a need to increase the amount of journeys taken by public transport to help ease traffic congestion and reduce carbon emissions.

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<h2>Landscape and Cultural Heritage</h2>				
<p>Conservation Areas (CAs)</p> <p><i>London Borough of Camden Conservation and Design team</i></p>	<p>The Council had 40 designated Conservation Areas at 2013. Each of these has a distinct character that requires protection. Further information on these is included in Camden's various Conservation Area Statements.</p> <p>At present no Conservation Areas have been identified as being at risk.</p> <p>(Refer to online policies map)</p>	<p>No comparable data beyond the local area - the numbers and type of designations reflect character and nature of individual Boroughs</p>	<p>The number of conservation areas designated in the borough has not increased since the publication of the LDF.</p> <p>There have been a number of extensions and these are reported in the Conservation Area Appraisal and Management Strategies.</p> <p>A local list is currently being drafted which identifies historic buildings and features that are valued by the local community and that help give Camden its distinctive identity.</p>	<p>Much of Camden is covered by conservation area designations, as can be seen on our proposals map, Conservation Areas are important in protecting the key elements of our cultural heritage and should be conserved and enhanced. Poor development in such areas can significantly harm their character and appearance.</p>
<p>Designated heritage assets</p>	<p>There are 5645 buildings/structures in the borough that have been</p>	<p>One of the highest number of listed buildings per borough in England and Wales.</p>	<p>Since 1999, the number of Listed buildings in the borough has increased by 50.</p>	<p>It is important to promote restoration of</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<i>London Borough of Camden Conservation and Design team, AMR 2012/13, Heritage at Risk Register 2013.</i>	<p>listed by English Heritage as having special architectural or historical interest.</p> <p>There are 40 buildings at risk in the borough (Source: English Heritage, Heritage at Risk Register 2013)</p>	<p>In 2012 there were 43 buildings at risk.</p>	<p>Since 2010 the buildings at risk has been reduced by 13</p>	<p>buildings at risk to further reduce the number of structures on the buildings at risk list in Camden.</p>
<p>Non-designated heritage assets</p> <p><i>Camden Local List, 2015</i></p>	<p>Camden's Local List identifies historic buildings and features that are valued by the local community and that help give Camden its distinctive identity.</p> <p>Over 400 non-designated heritage assets are on the current list.</p>	<p>No comparable data identified.</p>	<p>No trend has been identified.</p>	<p>This list identifies features make a place special for local people, they carry history, traditions, stories and memories into the present day and add depth of meaning to a modern place. It is important that they are taken into consideration.</p>
<p>Extent of Archaeological</p>	<p>There are 13 Archaeological Priority Zones (APZs) in</p>	<p>Archaeological remains have also been found in numerous other parts</p>	<p>No trend has been identified.</p>	<p>Archaeological assessments are</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
Priority Zones <i>London Borough of Camden Design and Conservation team</i>	Camden. (as shown on our proposals map)	of the borough, in areas that are not designated APZs.		important in ensuring significant archaeological remains are protected.
Number of Scheduled Ancient Monuments and Registered Parks and Gardens <i>London Borough of Camden Conservation and Design team</i> <i>English Heritage</i>	There is one Scheduled Ancient Monument in the borough, being Boadicea's Grave in Hampstead Heath. There are 13 registered parks and gardens in Camden.	There are 18,300 Scheduled Ancient Monuments in the UK (LDF scoping 2008). The schedule now has 19,806 entries and London has less than 200 scheduled sites.	No trend has been identified.	It is important that new development does not harm this Scheduled Ancient Monument or registered parks and gardens in Camden.
Open Space				
Open spaces <i>AMR 2012/13</i>	The Council's 2008 Open Space Review identified that there are 280 open spaces,	In 2012/13 one scheme was permitted that involved development on privately accessed protected	None identified but increased population levels and projections will place greater	Monitoring open space typologies helps the

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>totalling an area 526.6 hectares and representing 25% of the borough's land area. Of these, 110 (75% of open space area) are publicly accessible. See map 1.</p>	<p>public open space, and four schemes incorporate new open space.</p>	<p>demands on open spaces and bring the amount of open space below NPFA recommended standards.</p>	<p>Council to focus resources to where they are most needed and survey any changes over time.</p>
<p>Open space deficiency</p> <p><i>Open Spaces Sport and Recreation Study (2014)</i></p> <p><i>AMR 2011-2012</i></p>	<p>Camden has over 527 hectares of parks and open spaces.</p> <p>Areas deficient in access to public parks (2014):</p> <ul style="list-style-type: none"> • 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 	<p>In 2011/12 no schemes were permitted by Camden which involved a loss of open space. There have been no losses in designated open space since 2009/10 when two small schemes recorded a collective loss of around - 2,500sq m which was largely mitigated by a land swap.</p>	<p>None identified.</p>	<p>In 2011/12 no schemes were permitted by Camden which involved a loss of open space.</p> <p>Access to high quality open space is an important indicator of the quality of life in the borough. Therefore, areas of deficiency need to be minimised and existing open spaces improved.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>Pancras and Somers Town ward.</p> <ul style="list-style-type: none"> • Kentish Town – small deficiency area in Kentish Town Ward and Cantelowes wards. • Central London – small deficiency area in Holborn and Covent Garden. <p>The largest access deficiencies (outside 400m catchment area) for children's play provision are located in the following wards:</p> <ul style="list-style-type: none"> • 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 			

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	Highgate (Hampstead Town / Frognal and Fitzjohns wards)			
<p>Area of designated open space / improvements to open space</p> <p>AMR 2012/13</p>	<p>There is 460ha or 24 sq m per person of open space in the borough, in the form of 300 designated open spaces. This meets the NPFA standard. In 2011/12, no schemes were permitted by Camden which involved a loss of open space. In 2011/12, 25,000sqm of new public realm was created within the Kings Cross scheme which includes green spaces, the new square and new streets.</p>	<p>This compares to the National Playing Fields Association (NPFA) standard of 24 sq m of open space per person. Of this 8 sq m should be children's play space and 16 sq m should be outdoor recreation space. This figure does not include amenity space.</p> <p>The London Plan target is that there should no net loss of designated open space. The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.</p> <p>Within the Mayor's SPG on Providing for Children and Young People's Play and Recreation, a benchmark standard of 10 sq m of play space per child is set and should be used to establish the quantitative requirements for play space provision arising from new development in an area.</p>	<p>Through legal agreements, there have been large increases in the amount of money secured for open space through new development. In 2011/12 more than £438k was negotiated for provision and improvement to parks and open spaces, a lower figure than in 2010/11 (£517k) and 2009/10 (£917k).</p>	<p>It is important that opportunities to create more open space are taken and that existing open spaces be improved, particularly in areas of deficiency. However, it is likely that land supply in Camden will potentially pose a significant constraint in providing additional open space, particularly given the demand for additional housing.</p>
Public opinion	Residents' survey in 2013	No identified comparable data. The	None identified but increased	People's

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>of open spaces in Camden</p> <p><i>Open Spaces Needs Assessment Report, draft (March, 2014)</i></p>	<p>showed that 40% of residents identifies that no improvements should be made to the open spaces. 36% of residents stated that time constraints was a major barrier to not using local parks or open spaces and 10% stating a disability was another reason.</p>	<p>quantity and quality of open space nationally and regionally will vary in nature, scale and character.</p>	<p>population levels and projections will place greater demands on open spaces and bring the amount of open space below NPFA recommended standards.</p>	<p>perceptions of open spaces are important in determining the quality of life of the borough's residents. However, these may not necessarily reflect quantitative data on open spaces.</p>
<p>Number of Tree Preservation Orders (TPOs) served</p> <p><i>Camden Tree Officer</i></p>	<p>In 2011/2012 44 TPOs were served, in 2012/2013 61 TPOs were served and in 2013/2014 (march – march 64 TPOs were served.</p>	<p>Conserve existing tree cover and increase.</p> <p>Increase the number of TPOs served.</p>	<p>The figures show a steady increase in TPOs over time.</p>	<p>There is a need to find a balance between protecting the borough's trees and enabling appropriate new development.</p>
<p>Number of applications affecting trees protected by TPOs</p>	<p>No baseline information is currently available for this indicator.</p>	<p>No baseline information is currently available for this indicator.</p>	<p>No baseline information is currently available for this indicator.</p>	<p>No baseline information is currently available for this indicator.</p>
<p>Number of applications permitted that involved the loss of trees</p>	<p>No baseline information is currently available for this indicator.</p>	<p>No baseline information is currently available for this indicator.</p>	<p>No baseline information is currently available for this indicator.</p>	<p>No baseline information is currently available for this indicator.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
protected by TPOs				
Biodiversity, Flora and Fauna				
<p>Change in priority species (by type)</p> <p><i>Camden Biodiversity Action Plan 2013 – 2018</i></p>	<p>From the Camden Biodiversity Audit (GiGL, 2012) and stakeholder engagement, key species were identified for priority within the Camden Biodiversity Action Plan (BAP).</p> <p>The priority species were identified as: bats, hedgehog, butterflies, house sparrow, swift, bees, slow worm and stag beetle.</p> <p>Four bat species have been seen regularly in Camden in the vicinity of Hampstead Heath and there are also known roost sites in the borough.</p> <p>Hedgehogs are known to use three sites in the borough and also known to use gardens, mainly in the</p>	<p>There are 16 resident bat species in the UK, eight of which are known to breed in London.</p>	<p>The decline in bat numbers may be due to the loss of roost sites, through the removal of trees and underground structures and the sealing of roof areas. Bats are also threatened by the loss and/or fragmentation of forage and commuting sites through development, lighting and/or unsuitable land management.</p> <p>Swifts nest in the eaves of buildings and were once common in London, but modern developments and renovations have excluded them and numbers have declined.</p> <p>Slow worms are more common in outer London boroughs. Populations may occur in Camden along railsides, on brownfield sites and on allotments but these are likely</p>	<p>Need to ensure that priority species do not further decline in the borough and receive adequate protection and encouragement through the planning process.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>north of the borough.</p> <p>Numbers of house sparrows in London have declined by 60% over the last 25 years, posing a high conservation concern.</p> <p>Two stag beetles were seen in the borough in 1998. Their demise is in part due to the general loss of habitat to urban development (backland, railsides, etc).</p> <p>Butterflies, bees and other pollinators – to update through evidence.</p>		<p>to be isolated and at risk from further fragmentation of habitats by development</p>	
<p>Change in priority habitats (by type)</p> <p><i>Camden Biodiversity Action Plan 2013 - 2018</i></p>	<p>From the Camden Biodiversity Audit (GiGL, 2012) and stakeholder engagement key habitats were identified for priority within the Camden Biodiversity Action Plan (BAP).</p> <p>The habitats are:</p> <ul style="list-style-type: none"> • Green corridors • Green roofs • Public parks / 	<p>The Camden BAP 2013-18 aims to ensure that Camden's open spaces and natural habitats are managed to benefit wildlife across the borough.</p> <p>Camden BAP priority habitats do not directly equate to London or England priority habitats but using GiGL typology we can make the following comparisons: (to update following evidence)</p>	<p>To update following new evidence.</p>	<p>Some habitats are under greater threat from development than others. It is important to recognise the roles that each habitat plays in supporting biodiversity.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>amenity grass</p> <ul style="list-style-type: none"> • Private gardens • Hedges • Housing estates • Acid grassland • Ponds and standing water • Wetlands, canal • Orchards • Woodland • Meadows • Roadside verges • Brownfield 			
<p>Net loss/gain of Sites of Important Nature Conservation (SINCs)</p> <p><i>AMR 2012/13</i></p> <p><i>Camden's Biodiversity Action Plan 2013 - 2018</i></p>	<p>There are 4.56ha of sites that are managed for nature conservation.</p>	<p>2012/13 data shows a total of 430ha of land is classed as having biodiversity importance (no change from 2011/12). 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 and 15 Sites of Local Importance.</p> <p>The Camden SINC review 2014 surveyed 40 sites, of these:</p> <ul style="list-style-type: none"> • 1x Borough Grade II SINC is upgraded to Borough Grade I SINC; • 1x current non-SINC site is 	<p>In 1993 there were 25 SINCs in the borough. This had increased to 30 by 2003 and by a further three up to 2005/06. There are now 36 SINCs in 2012/13.</p>	<p>Existing SINCs provide important habits for priority species and other flora and fauna in the borough, which need to be protected from future development.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
		<p>proposed to be graded as a Borough Grade II SINC;</p> <ul style="list-style-type: none"> • 2x current non-SINC sites are proposed to be graded as Local Grade SINCS; • 14x SINCS require boundary changes with 3.04ha of former SINC area to be removed and 1.19ha of area to be added; • 34x SINCS require updates to citations. 		
<p>Number of developments that have incorporated green roofs, landscaping or open space to improve biodiversity</p>	<p>No quantified baseline information is currently available for this indicator.</p> <p>However, it is known that the Council has seen a general increase in the number of development proposals incorporating green roofs in their design.</p> <p>The Camden Biodiversity Audit (GiGL, 2012) included a snapshot of the number of living roofs installed, underway or planned in Camden in Oct 2012 as 205 roofs covering approx. 4.5ha</p>	<p>No quantified baseline information is currently available for this indicator.</p>	<p>No quantified baseline information is currently available for this indicator.</p> <p>However, it is considered likely that with the push from national and regional government for sustainable design that the number of developments incorporating green roofs and other biodiversity enhancing design elements will only increase over time.</p>	<p>As more and more land is developed, particularly in the form of extensions to existing properties, it will become increasingly important that new developments and extensions to existing buildings incorporate green roofs and other biodiversity enhancing</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				design elements.
Recycling and Waste Management				
% of household waste recycled <i>AMR 2012/13</i>	In 2012/13 30.91% of Camden's waste was recycled. See figure 20.	Camden's current targets for recycling and waste reduction, as set out in Camden's Green Action for Change, are as follows: "We aim to contribute to a North London recycling and composting rate of 50% by 2020 from 30% (Camden) levels in 2009-10. We aim to reduce residual household waste from 2008/09 levels by: - 3% by 2012 - 15% by 2020.	The last 10 years have seen a general trend of reducing volumes of waste and increasing recycling rates despite population growth. The total municipal waste arisings for Camden in 2011/12 was 110,890 tonnes and the amount recycled was 21,274 tonnes. In 2012/13 30.91% of household waste was recycled.	The increase in the borough's population in the future will place increased pressure on existing waste management facilities and highlights the need to ensure waste is managed efficiently and where possible reduced, reused and recycled.
% new developments using sustainable construction	No baseline information is currently available for this indicator.	The London Plan requires that future developments meet the highest standards of sustainable design and construction.	No trend identified.	Sustainable construction is important in reducing the negative impact of new development on the environment.

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<h2>Climate Factors</h2>				
<p>Proportion of energy generated from renewable sources</p> <p><i>AMR 2012/13</i></p>	<p>In 2012/13 of 23 relevant major schemes approved:</p> <ul style="list-style-type: none"> • 4 met 20% or more target reduction in CO₂. • 6 met less than 20% of its energy needs using renewable technologies; • 4 schemes used renewable technologies but did not specify a separate figure from other CO₂ reduction measures; and • 5 schemes did not include renewable energy technologies. 	<p>The London Plan 2011 requires all new major development proposals to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible.</p>	<p>The annual change in carbon emissions from 2005 – 2011 for Camden, Greater London and the UK is shown in Figure 3.</p> <p>Total % change: Camden -11% Greater London -10% UK -17%</p>	<p>It will become increasingly important to ensure that energy for new developments is renewably sourced, as it is not sustainable for development to continue relying upon non-renewable energy sources.</p>
<p>Domestic energy efficiency in housing – SAP</p> <p><i>Camden Joint Strategic Needs Assessment, 2012</i></p>	<p>SAP provides a measure of properties energy efficiency (a higher SAP rating = greater energy efficiency).</p> <p>The energy efficiency SAP of Camden Council homes 2002/03 – 2008/09:</p> <ul style="list-style-type: none"> • 2002/03 = 58 • 2003/04 = 66 • 2004/05 = 66 	<p>In 2004 private rented house condition survey found that owner occupied, housing association, and private rented homes had a SAP rating of 58, which compared favourably with:</p> <ul style="list-style-type: none"> • a SAP rating of 41 for Camden homes of the same tenures in 1996; and • with 2001 SAP ratings of 53 across London and 51 nationally. 	<p>One factor in Camden's relatively high SAP ratings is likely to be the predominance of flats in Camden, as dwellings of this type tend to be more energy efficient than houses.</p> <p>The energy efficiency of buildings is gradually improving.</p>	<p>Energy efficiency is fundamental in reducing energy consumption of new development. Planning policy should continue to secure energy efficient new</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<i>Housing Strategy Evidence base 2011</i>	<ul style="list-style-type: none"> • 2005/06 = 68.6 • 2007/08 = 70.3 • 2008/09 = 70.6 			homes and encourage improvements to existing stock.
<p>Number of new developments accompanied by a BREEAM assessment <u>with ratings of very good or excellent</u></p> <p>Number of Code for Sustainable Homes achieving Level 3 and above</p> <p><i>AMR 2012/13</i></p>	<p>In 2012/13 of the 14 schemes undertaking BREEAM assessments:</p> <ul style="list-style-type: none"> • 2X schemes achieved an excellent rating; and • 12x schemes achieved a very good rating. <p>In 2012/13 of the 9 schemes undertaking Code assessments:</p> <ul style="list-style-type: none"> • 1 scheme achieved Level 5; • 5 schemes achieved Level 4; and • 3 schemes achieved Level 3. 	Increase the proportion of BREEAM and CfSH assessments submitted with major planning applications with higher ratings and levels.	The number of schemes achieving higher BREEAM rating and Code Levels is expected to increase in line with London Plan.	Evidence from the AMR 2012/13 illustrates that we are meeting targets with exceptions to some cases. The number of major developments hitting higher levels of sustainability needs to be increased.
Number of new developments incorporating water conservation measures e.g. SUDS	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<h2>Air Quality</h2>				
<p>Carbon dioxide (CO₂), Nitrogen dioxide (NO₂) and Dust and particulate matter (PM₁₀) emissions</p> <p><i>Camden's Air Quality Action Plan 2013 - 2015</i></p> <p><i>AMR 2012/13</i></p>	<p>Camden has some of the poorest air quality in Europe, especially in the south of the borough where traffic congestion is severe (map 2). Since 2000, the whole borough is designated an Air Quality Management Area.</p> <p>Camden's Clean Air Action Plan 2013 – 2015 brings together a variety of actions to help reduce air pollutants in Camden. Nitrogen Dioxide and Particulate Matter 10 arises from traffic, boilers and other sources (figure 4 & 5).</p> <p>Camden has four automatic monitoring sites in the borough, as well as 16 diffusion tubes. Details of monitoring sites can be found here.</p> <p>Camden is meeting the objectives for all pollutants</p>	<p>In 2011, the annual NO₂ objective was exceeded at all of LB Camden's four automatic monitoring sites, with particularly high readings at the new monitoring station installed in 2010 on the Euston Road, which is part of the roads network managed by TfL.</p> <p>The hourly objective for NO₂ was breached at both Swiss Cottage and Euston Road monitoring sites in 2011 but not at the Bloomsbury and Shaftesbury Avenue sites. Although Camden is meeting the objectives for PM₁₀, it remains a pollutant of focus within the Air Quality Management Area.</p>	<p>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.</p>	<p>Air quality in Camden is very poor and this can have a significant effect on the health of those living, working and visiting the borough.</p> <p>It is important that the planning system plays its part in helping reduce emissions in the borough. Camden is working to address this issue by: reducing transport emissions, reducing emissions from buildings and</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>other than NO2. The key sources of NOX and PM10 are shown in figures 4 & 5.</p>			<p>new developments, and by raising awareness.</p> <p>Camden is also working to reduce PM2.5 as research suggests that particulates of this size have the worst health impacts however, we do not have data for this at present.</p>
<h2>Soil</h2>				
<p>Number of sites of potential land contamination</p> <p><i>Camden's Environmental Health team</i></p>	<p>There are currently no sites in Camden that are designated as contaminated land for the purposes of it should be Part II A Environmental Protection Act 1990.</p> <p>However, it is considered that most of Camden is</p>	<p>None identified.</p>	<p>The Council is investigating sites of potential concern on a priority basis under the legislation and will continue to regulate potentially contaminated sites through the planning process.</p>	<p>Local Plan to highlight potential contamination issues and need for assessment and remediation/mitigation (as relevant).</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	potentially contaminated owing to the extent of previous industrial uses across the borough.			
Water and Flooding				
%/No. of new developments incorporating flood mitigation measures in their design to reduce flood risk e.g. SUDS, evacuation plans, etc. AMR 2012/13	In 2012 and 2013, 64 applications were submitted with details of flood mitigation measures.	No baseline information was previously available for this indicator.	No trend identified.	The increasing proportion of development in Camden whether it is household extensions or redeveloped sites results in a smaller % land which is permeable.
Water use <i>Environment Agency</i>	Camden is within Thames Water's London Water Resource Zone – this is classified as 'seriously water stressed.' Average water use in Camden in 2010-11 was 166.5 litres per head per day (l/h/d) which is above the England and Wales average	Currently water use accounts for 27 percent of all carbon emissions from our homes. In London non-households accounts for 29 percent of water consumption and this is therefore an area where further water and carbon savings can be made.		Camden is a borough which suffers from water stress (high population with a high water demand and limited water availability) *it does not reflect water companies

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	of 148 l/h/d.			ability to supply water.
<p>Number of planning permissions granted contrary to the advice of the Environment Agency on flooding or water quality</p> <p><i>Thames River Basin Management Plan (2009)</i></p>	<p>No such permissions were granted in 2012/13.</p> <p>The Grand Union Canal (GB70610078) and Regents Canal is noted as being of 'moderate' water quality.</p>	<p>Grand Union Canal GB70610078 is 'moderate' status from the 2013 data which is a change from 'good' in 2009. This appears to be because further investigation was carried out after 2009 and it failed to reach 'good' on phosphate levels which is one of the elements we look at as part of the physio-chemical status.</p> <p>The Regents Canal GB70610510 remains at 'moderate' status which is the same as it's classification in 2009. It appears to failing to reach 'good' due to mitigation measures which are not yet in place e.g. measures which would make the watercourse more natural, bearing in mind this is an artificial/heavily modified water body.</p>	<p>No trend identified.</p>	<p>While Camden is not generally at risk of flooding from the river or the sea, increases in the amount of land built over poses a risk of further flooding occurrences like that which occurred in August 2002 and 2007 (Map 3).</p>
<p>Number of properties at risk from 1% and 0.1% floods and areas at particular risk in Camden</p>	<p>The borough is in an area that falls outside the extent of the extreme flood at the time of assessment of the likelihood of flooding. This means that the chance of flooding each year from rivers or the sea is 0.1% (1 in 1000) or less.</p> <p>There are approximately</p>	<p>The Environment Agency have an interactive flood risk map for risk of flooding from surface water which show areas of high, medium, low and very low risk.</p> <p>In August 2002, widespread surface water flooding occurred in the north of the borough in West Hampstead and Kentish Town. The topography of</p>	<p>The number of properties at risk from flooding from the river or the sea remains at zero.</p> <p>No trend identified for surface water flooding.</p>	<p>While Camden is not at risk of flooding from the river or the sea, increases in the amount of land built over affects water runoff and permeability. This poses a risk</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
Camden Flood Risk Management Strategy & <i>Environment Agency</i>	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. Map 4 identifies critical drainage areas and local flood risk zones in Camden.	Hampstead and the nature of summer thunderstorms makes high rainfall and associated flooding events likely in Camden.		of further flooding occurrences like that which occurred in August 2002. Key action to reduce the risk of flooding are outlined in our Flood Risk Strategy.
Noise and Vibration				
Number of important areas in Camden (noise hot spots) as defined by Defra <i>Environmental Health</i>	Defra has reported 40 areas in Camden as 'important' (noisy) and of these 20 areas are on TfL roads. Five important areas have been identified as first priority – which are noisiest in Camden.	No comparable data available.	No trend data.	These important areas are currently being investigated – some discounted through further evidence work.
Number of noise complaints received by the Council	<u>Construction noise</u> , from 2009/10 to 2013/14 noise complaints did not vary significantly (lowest recorded 482 2013/14 highest	It is apparent from the quantified data that the complaint categories (connected with current Camden planning policies) that have the highest number of noise complaints	Generally, the number of noise complaints received by the Council has decreased from 4823 in 2009/10 to 4023 in 2012/13.	To improve amenity by minimising the impacts associated with

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p><i>Environmental Health, 5 year data recorded</i></p>	<p>recorded 546 2010/11)</p> <p><u>Machinery fixed</u>, over 5 year period noise complaints have generally decreased from 314 in 2009/10 to 246 2013/14.</p> <p><u>Plant equipment mobile</u> the number of noise complaints have decreased from 2009/10 & 2010/11 from 57 & 50 to 25 in 2011/12 and 34 2012/13.</p> <p><u>Railway & underground</u> a small proportion of complaints have been received for underground noise (between 6 & 4). Railway noise is higher with 21 complaints in 2009/10 and 13 complaints to date in 2013/14.</p> <p><u>Vehicle traffic</u> number of noise complaints for vehicle traffic are relatively static from 15 in 2009/10 and 11 2013/14.</p> <p><u>People noise</u> the number of</p>	<p>are construction noise, people noise, and fixed machinery.</p> <p>Noise levels will vary between areas depending on nature/condition of roads, levels and nature of traffic and local traffic management measures and other background sources.</p> <p>Camden's Noise Strategy aims to reduce people's exposure to noise as much as possible and to achieve the Noise Directive and World Health Organisation (WHO) guidelines as minimum standards for exposure.</p>		<p>noise, by ensuring that noise generating uses are not permitted adjacent to noise-sensitive uses and vice versa.</p> <p>These figures are dependant on a complaint of noise being made to the Council – nonetheless the fact that a complaint has been made indicates impact upon amenity.</p> <p>It may be that more complaints were received for some categories more than others in view of perceived control over the</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	noise complaints have decreased from 720 in 2009/10 to 601 2012/13.			<p>source of noise i.e. railway noise and people noise.</p> <p>(figures for 2013/14 are likely to be slightly lower as these did not include data for Feb/March)</p>
Development on Previously Developed land				
<p>% of new housing on previously developed land</p> <p><i>AMR 2012/13 & 2011/12</i></p>	<p>In Camden the only land that has not been previously developed are parks and open spaces.</p> <p>In 2012/13 one scheme was permitted that involved development on privately accessed protected public open space.</p>	<p>In 2011/12 no schemes were permitted in Camden which involved the loss of open space. 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.</p>	<p>Regional and local policies exist affording strong protection for open space so the trend should continue.</p>	<p>Given the level of previous development in Camden, there is no reason why 100% of all future housing development and most other types of development also, should occur anywhere other than previously developed land.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				As such, an indicator that measures the proportion of development proposed on open space is a clearer indicator.
Health and Community Facilities				
Schemes involving a gain/loss in community facilities	Between April 2010 and March 2013 around 68,000 sq m of community facilities were created. During the same period circa 95,000 sq m of community facilities in D1 use class were approved and as at 1 st April 2013 a total of circa 68,000 sq m of unimplemented community floorspace was in the pipeline indicating that future years will continue to see growth in community premises.	The Core Strategy and the Development policies set a policy requirement for no loss of community facility floorspace unless a replacement facility is provided or the facility is no longer required.	<p>The net floor space change in community facilities has varied year by year.</p> <p>Future years will continue to see growth in community premises.</p> <p>The presence of the University College London, relocation of Central Saint Martins College of Arts and Design to the King's Cross Central development, and various other further education colleges are responsible for the high proportion of education floorspace being created</p>	It is important to encourage a balance in the supply of such uses to meet the needs of existing and future residents.

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
Provision of health facilities by type per 1000 population	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.
% of people describing their health as "good"/"not good" <i>2011 Census</i>	2011 Census: 53.4% described their health as very good, compared to the inner London average of 52.6%. 1.4% of Camden's population described their health as very bad, which is the inner London average. Whilst, 4.2% of Camden's population describe their health as bad, which is above the inner London average of 3.9%	Camden is ranked 7 th of the inner London boroughs where residents class their health as very good.	There has been a significant increase in the percentage of people living in Camden that describe their health as 'good and very good'.	This indicator was included for the first time in the 2001 Census for Dept of Health.
% of people with limiting long-term illness <i>2011 Census</i>	In 2011 14.4% of Camden residents stated that their day-day activities were limited due to a health problem or disability which has lasted, or will last at least 12 months- this figure is above the inner London average of 13.6%, but lower than England & Wales at	In 2001 - 15.8% in Camden 15.5% in Greater London 18.2% in England & Wales	The percentage of people in Camden with a limiting long-term illness has decreased from 2001 to 2011.	Consideration needs to be given to the needs of people with limiting long-term illness in providing services in Camden.

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	17.9%.			
Major causes of death in Camden <i>Joint strategic needs assessment, health, 2013</i>	<p>There are approximately 1,147 deaths a year in Camden from all ages. The main causes of death in Camden (all ages) are from circulatory diseases (31%), cancer (29%) and respiratory disease (12%).</p> <p>43% of all deaths (487) are premature (deaths of those under the age of 75 years). It is of note that in premature deaths a higher proportion are due to cancer (35%) than circulatory disease (25%) and this is particularly stark for women compared to men. See figure 8.</p>	No comparators.	No trends.	
% people with a low satisfaction score (self-reported well-being)	Camden – 6.7% (estimated data - significantly worse than England)	England – 5.8%	First year of collection	None identified at present.

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<i>Public Health Outcomes Framework 2013 - 2016</i>				
% of people using outdoor space for health/exercise (Mar '12 – Feb '13) <i>Public Health Outcomes Framework 2013 - 2016</i>	Camden 17%	Camden is not significantly different to London (11%) and England (15%)	First year of collection via survey by Natural England.	Green spaces have a beneficial impact on physical and mental wellbeing and cognitive function through both physical access and usage.
% of active adults (2012) % of inactive adults <i>Public Health Outcomes Framework 2013 - 2016</i>	Camden – 56% (not significantly different to London or England) Camden – 29% (not significantly different to London or England)	London – 57% England – 56% London – 28% England – 29%	No trend data available.	
Excess weight in adults (2012) <i>Public Health Outcomes Framework</i>	Camden – 50% (significantly lower than England). Camden 21%	London – 57% England – 64% London –	+1.5% since 2006/07 (no significant difference) -0.3% since 2006/07	

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
2013 – 2016 Excess weight in 4-5 year olds (2012/13) Excess weight in 10-11 year olds (2012/13)	(no different to England) Camden – 36%	England – 22% London – England – 33%	(no significant difference) -0.6% since 2006/07 (no significant difference)	
Mortality rate from causes considered preventable (2010-12) <i>Public Health Outcomes Framework 2013 - 2016</i>	Camden – 195.8 per 100,000 (not significantly different to London and England)	London – 178.2 per 100,000 England – 187.8 per 100,000	Current Camden rate down from 293.4 per 100,000 in 2001-03 (significant reduction)	
Under 75 mortality rate from cardiovascular disease considered preventable (2010-12) <i>Public Health Outcomes Framework 2013 - 2016</i>	Camden – 48.8 per 100,000 (not significantly different to London and England)	London – 52.0 per 100,000 England – 53.5 per 100,000	Current Camden rate down from 107.3 per 100,000 in 2001-03 (significant reduction)	
Air quality –	2008, 107 deaths in Camden	In 2008 GLA estimated 4,267 deaths		

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>health impacts</p> <p>Air Quality information for public health professionals, GLA, 2008 (London Borough of Camden report)</p>	<p>were attributed to PM2.5.</p>	<p>were attributable to long term exposure to small particles</p>		
<p>Numbers of Care Homes for older people</p> <p><i>Strategic Commissioner</i></p> <p><i>ONS Mid 2011 & 2012 Population Estimates (MYEs) TAP 2013-01</i></p>	<p>The Council had 4x residential care homes in summer 2013 (Wellesley Road, Ingestre Road, Branch Hill, St Margarets). Summer 2013 both Wellesley and Ingestre Road closed and residents were relocated to the new Maitland Park care home, managed by Shaw Healthcare.</p> <p>The Council has 3x block contracts for nursing older people at St John's Wood, Landsdowne (over border at Barnet), Ash Court and spot purchase at 3 others: Rathmore House, Compton Lodge and Spring Grove.</p>	<p>Camden has a similar proportion of older people aged over 65 years (11%) when compared to Greater London, but smaller than the national average for England & Wales (17%).</p>	<p>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>Demand for residential and nursing care exceeds in borough supply – we need to spot purchase beds from outside Camden (which is the case for most inner city boroughs where land is scarce and expensive).</p> <p>At the end of 2012/13 the Council spot purchased 190 residential and 90 nursing beds. By 2018 we anticipate that the need to spot purchase a similar number of residential</p>	<p>The supply care homes in Camden should continue to adequately cater for the demand for such uses.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
			beds (increase in older people netted off by strategy of enabling more people to stay at home), but much fewer nursing beds (because, while the numbers of 85+ will increase over the coming years, the new care homes at Maitland Park and Wellesley Road will significantly increase our in-borough provision).	
Number of care homes for mental health <i>Camden's Housing Group</i>	The Council has one care home for adults with Mental Health problems – Camden Park House (12 beds) and one nursing home – Mary Wollstonecraft House (9 beds). Substance Misuse Services at Burghley Road (12 beds) for alcohol dependency.	None identified.	There have been vacancies at Burghley Road. A scoping study at Mary Wollstonecraft House will be able to provide more information on need.	The supply care in Camden should continue to adequately cater for the demand for such uses.
Number of Sports/ Playing fields and outdoor recreation spaces Open Space Review, 2008	The Council's 2008 Open Space Review identified that there are 280 open spaces, totalling an area 526.6 hectares and representing 25% of the borough's land area. Of these, 110 (75% of open space area) are publicly accessible.	None identified.	None identified.	There is a low level of provision of outdoor sport facilities and, in particular, of grass pitches.

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>The review noted 11 (8.4 ha) open spaces for sport however, none of these were publically accessible.</p>			
<p>Levels of crime in Camden</p> <p><i>Joint strategic needs assessment, health, 2013</i></p>	<p>Camden experiences crime similar to most other inner-city areas. After Westminster, Camden has the highest crime rate of any London local authority. In February 2012 Westminster had 24.1 offences per 1,000 residents; Camden had 12.5 per 1,000 residents, while the average for London was 8.5 per 1,000 residents.</p> <p>Theft accounts for the majority of recorded crime (53%) followed by violence against the person. See figure 9.</p>	<p>Camden has also seen the greatest reduction in overall crime compared with all London boroughs. Between the period 2001/2 and 2011/12 the total number of crimes dropped by 32% (53,031 to 35,825).</p>	<p>London has seen a 2% reduction in all crime over the same period although theft of personal property has increased by 18% across the region. Camden's neighbouring boroughs, Westminster and Islington have also seen significant increases in theft of personal property.</p>	<p>The high crime rate is partly explained by the high number of visitors to Camden.</p> <p>Maintaining the reduction has become increasingly difficult and current figures show a 7% increase over the past twelve months. The increase is due largely to significant rises in theft from person offences (+57%) in Camden's major centres.</p>
<p>Violent crime in Camden</p>	<p>There are just over 5,000 'violence against the person'</p>		<p>Youth Offending Service data shows that violence against</p>	<p>Like other types of crime many</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<i>Joint strategic needs assessment, health, 2013</i>	recorded offences in Camden each year, which equates to around 16% of all recorded crime.		<p>the person offences committed by young people has fallen by 39% over the last three years although it accounts for 18% of crime types.</p> <p>Violence against the person (VAP) has decreased by 3.4% in Camden over the last two years. However, the changes by crime type are mixed, with common assaults and assaults with injury increasing.</p>	<p>offences will not be reported to the police or other agencies, therefore the actual number of violent offences committed will be higher.</p> <p>Cuts in public sector funding, further downturn in the economy and associated employment rates constitute the biggest risks to levels of violent crime</p>
% Developments incorporating secure by design principles	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.
Education				
Area of new	Camden is home to more	No comparators and targets	Between 1 st April 2006 and	It is important to

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>education facilities created</p> <p><i>SP&I team 2014</i></p>	<p>higher education institutions than any other local authority area. Camden has 10, including University College London (UCL), the School of Oriental and African Studies (SOAS), the London School of Hygiene and Tropical Medicine, Birkbeck and the University of London. The borough is home to the largest population of higher education students in London, with 24,300 domestic and foreign students living in the borough and enrolled at publicly funded institutions (HESA 2012/13). 31% live in University or private sector halls of residence or flats. More than a third of students (42%) live in the area south of Euston Road.</p>	<p>identified.</p>	<p>31st March 2013 our records show an increase of circa 110,000 sq m of educational floorspace in the borough. Most significant developments include relocation of Central Saint Martins College of Arts and Design to the King's Cross Central development,</p>	<p>encourage a balance in the supply of such uses to meet the needs of existing and future residents.</p>
<p>Indices of deprivation – education skills and training</p> <p><i>Indices of multiple deprivation,</i></p>	<p>The LSOA with a rank of 1 is the most deprived, and 32482 the least deprived, for each domain.</p> <p>Of the 18 wards in Camden: Hampstead, Belsize, Frognal & Fitzjohns, Highgate, and</p>	<p>None identified.</p>	<p>Overall Camden is less deprived according to the indices of deprivation 2010, compared to the previous set in 2007</p> <p>There are very wide disparities within the Borough and wards</p>	<p>Note/reflect levels of deprivation and local ward disparity.</p> <p>The Indices of Deprivation 2010</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
2010	<p>Fortune Green are the least deprived wards with regard to education skills and training.</p> <p>The following five are the most deprived wards in Camden for education skills and training: St Pancras and Somers Town, Haverstock, Regents Park, Kilburn and Kings Cross.</p>			was an LSOA level set to reflect the fact that deprivation is often found in small clusters.
Proportion of adults with poor literacy and numeracy skills	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator.	No baseline information is currently available for this indicator – last figure for this was in 2001.
School capacity – Primary <i>Primary School Places Planning Report, Children, Schools and Families</i>	<p>Figure 10 shows the % of reception and primary places filled in the borough – this shows that for the borough as a whole, all years (with the exception of Year 6) are at or above 90% capacity.</p> <p>There is particular pressure in the younger age ranges and in the north west of the</p>	There has been a reduction in the number of unfilled places in reception and year 1 classes in the borough from 2005 – 2012.	Registered births feed into Greater London Authority (GLA) population and school roll projections, but it is useful to look at trends separately.	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 based on the latest evidence

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<i>Scrutiny Committee, 18th July 2013</i>	borough more generally. Map 5 shows primary school provision for 2013/14.			(including birth rates, population estimates, school roll projections, housing development information and admissions).
School capacity – Secondary <i>Secondary School Places Planning Report, Children, Schools and Families Scrutiny Committee, 18th July 2013</i>	Figure 11 shows that in the secondary age range the percentage of surplus have increased from 4.4% in 2009 to 10.3% in 2013 without UCL Academy included and, 14.7% in 2013 with UCL Academy included. The increasing surplus is due largely to lower rolls at Regent High and Maria Fidelis schools in the south of the borough and capacity at UCL rolling through academic year groups. However this does not seem attributable to lower population figures.	The school roll projections received from GLA in 2013 are based on a new model and are not directly comparable to the previous two years. However the places planning report looks at many different strands of information in combination.	The introduction of the UCL Academy will be enough to meet the need until the end of 2022/23 with the exception of 2019/20 when there is expected to be a shortfall in year 7 spaces. However, additional housing development could see a sustained need for places beyond 2019/20 and current year 7 capacity would be insufficient without the expansion of Regent High School.	An analysis of the planned housing trajectory data up until 2026/27 looking at cumulative growth in terms of additional forms of entry (FE) based on estimates of child yield suggests intensive areas of development; particularly King's Cross development and West Hampstead Interchange are

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				likely to yield increased demand for places in these areas.
Number of NEET's (young people Not in Education Employment and Training)	<p>In Nov-11 to Jan-12, 7% of 16-18 year olds resident in the borough were NEET (an average of 281 16-18 year olds each month). Central London rate was 5.1%.</p> <p>Number of young people with an unknown destination - In Nov-11 to Jan-12, the unknown figures for Camden were 13.7% compared to a Central London rate was 16.1%.</p>	When combining NEETs and 'Unknowns', Camden had one of the lowest rates in Central London (and having a lower % of young people with an unknown destination means we are in a position where we know more about our vulnerable young people).	In August 2012, Camden had 92 NEETs and 70 benefit claimants (18 year olds) – a difference of 22 young people. This is one of the smallest 'differences' in Central London, indicating that our most vulnerable 18 year olds are being supported.	The Local Plan should support the NEET pilot programme and seek to reduce the number of NEET's
Leisure				
Completed leisure (D2) floorspace <i>SP&I team, 2014</i>	Notable developments included gain of two gyms with total floorspace of 3,589 sqm and loss or around 1,700 sqm of leisure floorspace in the Kentish Town Sports Centre scheme.	None identified.	Between 1 st April 2006 and 31 st March 2013 our records indicate a loss of circa 250 sq m of leisure floorspace in the borough	Leisure floorspace should reflect local need and demand of existing and future residents and should be accessibly

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				located to reduce private car journeys.
Access to open spaces	The open space indicator relating to open spaces and deficiency covers this indicator. In addition, reference should be made to indicators under Health and community facilities.			
Population				
<p>Borough Population: By age and sex</p> <p><i>2011 Census: DC2101EW: Ethnic group by sex by age, ONS 2013</i></p> <p><i>ONS Mid 2011 & 2012 Population Estimates (MYEs) TAP 2013-01</i></p>	<p>Resident population = 220,338</p> <p>51% female 49% male</p> <p>The age structure of Camden is relatively young with a mean age of 36.3 years, similar to Greater London (36.1 years), but both are lower than the national average of 40 years.</p> <p>Camden's resident population, by proportion: <input type="checkbox"/> 42% are aged under 30 <input type="checkbox"/> 69% are aged under 45</p>	<p>Camden has:</p> <ul style="list-style-type: none"> Since 2001, the mean age in Camden has increased by 0.6 of a year, less than the increase in the England & Wales average age of 0.9 years. Overall age of Londoners has decreased by 0.3 years over this period. Lower proportion of children aged under 16 (16.1%) compared to Greater London or England & Wales (19.9% & 18.9%). <p>Camden has proportionally fewer children aged under-18 and fewer people aged 40+ than either</p>	<p>Compared to England and Wales as a whole, there are a high proportion of young adults but there are relatively fewer children and older people.</p> <p>In the year to mid-2012 migration from the rest of the UK to Camden is estimated to have been 20,400 people. The migration of people from Camden to the rest of the UK is a larger flow of 22,700 people, giving a net loss from Camden to the rest of England & Wales of -2,300 people. These flows include domestic university students.</p>	<p>ONS Mid-year Population Estimates (MYE) is the 'official' estimate, prepared 1 year in arrears each Aug.</p> <p>Mid-2012 is the last reliable estimate.</p> <p>Much work has been undertaken by ONS over the last decade to improve</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>□ 89% are aged under 65+</p> <ul style="list-style-type: none"> - (13794) 6.13% aged between 65 – 74 - (8137) 3.62% aged between 75 – 84 - (3273) 1.5% aged 85+ 	<p>London or England & Wales, but has a much larger proportion of younger working aged people aged 20-40 years.</p> <ul style="list-style-type: none"> • Camden has relatively few people of the older working age group aged 45-64 accounting for a fifth (20%) of the population, compared to 21% in London and 25% in England & Wales. • Camden has a similar proportion of older people aged over 65 years (11%) when compared to Greater London, but smaller than the national average for England & Wales (17%). • Since 2011 Camden has seen the 6th largest population growth of all local authorities in England & Wales and 5th in London after Tower Hamlets, City, Hillingdon, and Islington. 	<p>International flows to and from Camden are smaller than the internal migration flows. In the year to mid-2012 international in-migration is estimated to have been 12,000 people. The out-migration of people from Camden is estimated to be 6,700 people, resulting in a net gain to Camden of 5,200 people. These flows include overseas university students.</p> <p>The increasing natural change is due both to the increasing number of births recorded to Camden-resident mothers (up from 2,900 in 2001-2002 to 3,100 in 2011-2012) and to the falling number of deaths to Camden residents (down from 1,400 in 2001-2002 to 1,100 in 2011-2012).</p>	<p>migration estimation, including methodological improvement to within England & Wales flows for estimating the effects of students and to international in-flows by improvements to the International Passenger Survey.</p> <p>However, despite the improvements, between mid-2001 and mid-2011, the 2001-based mid-year estimate series over-estimated Camden's population by 18,600 (8.5%)¹, mainly due to</p>

¹ By comparing the rolled forward 2001-based estimate for mid-2011 with the 2011 Census-based estimate for mid-2011.

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				the difficulty in accurately estimating migration.
<p>Population characteristics 1: Population by ethnic group</p> <p><i>2011 Census: DC2101EW: Ethnic group by sex by age, ONS 2013</i></p> <p><i>Previous censuses</i></p>	<p>The following groups in Camden represented as a percentage:</p> <ul style="list-style-type: none"> • 66.3% White • 16.1% Asian/Asian British • 8.2% Black/African/ Caribbean/ Black British • 5.6% Mixed/multiple • 3.8% Other <p>Of these the largest groups are:</p> <ul style="list-style-type: none"> • 44% English/Welsh/ Scottish/ Northern Irish/ British • 19% Other white • 5.7% Bangladeshi • 4.9% African • 4% Other Asian <p>See figure 12.</p>		<p>Camden has an increasing proportion of people from Black and Minority Ethnic groups.</p> <ul style="list-style-type: none"> • Between 2001 & 2011 Censuses, the proportion of BME groups increased from 26.8% to 33.7% • The largest BME group is Bangladeshi. In the decade 2001 to 2011 the group has seen a decline in overall proportion (6.3% to 5.7%), but this is mainly due to the growth in the Other White population - the overall number has remained similar (12,500). 	<p>Individual ethnic groups are not always directly comparable between 1991, 2001, 2001 and 2011 due to changes in the categorisation, these are Other Asian, Arab, and Other Ethnic Group.</p>
<p>Population characteristics 2: Country of Birth</p>	<p>Of the 376 local and unitary authorities in England & Wales the <i>2011 Census</i> reveals Camden had:</p>	<p>GLA ethnic group projections forecast a small rise in the proportion of people from <i>non-White</i> ethnic groups, from under 34.8% in 2013 to 37.3% in 2031. Growth is projected in <i>Chinese</i>,</p>	<p>The proportion of Camden residents born <i>outside the UK</i> has been increasing: 1981 = 30% 1991 = 32%</p>	<p>Very difficult to use the EU definition over time as it has changed.</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>2011 Census: Previous censuses</p>	<ul style="list-style-type: none"> • Rank 8th highest LA by proportion of residents born elsewhere in EU (13%), inc. Ireland. EU as at Mar-11) • Rank 11th highest LA by proportion of residents born outside the EU (29.5%). <p>According to the 2011 Census 60% of Camden residents were born in UK or Ireland. Of the remainder, 11% were born in other EU countries and 30% from elsewhere in the world. After England, more Camden residents were born in the United States, Bangladesh, the Republic of Ireland, France, Scotland, Australia, Italy, Germany and Somalia than any other individual country in the world. In 2011 38% of births were to Camden-resident mothers born in the UK; 19% to those born in Middle East and Asia; 18% in Europe, 14% in Africa and 11% in the rest of the world.</p>	<p><i>Other Asian, Other Black and Indian</i> groups.</p>	<p>2001 = 37% 2011 = 42.2%</p>	

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
Household size and composition <i>2011 Census</i>	<p>Total households 2011 = 97,534</p> <p>1 person households 40.53%</p> <p>Married couple households 20.16% of all households 7.2% no children 10.5% children 2.4% non-dependent children</p> <p>Cohabiting couple (9,534) 9.77% of all households: 7.48% no children 2% children 0.3% non-dependent children</p> <p>Lone parent households 9.96% of all households</p> <p>Other household types 16.92% of all households</p>	<p>In 2011 Camden had the fifth highest proportion of one person households (other) in England and Wales.</p> <p>1 person households Camden had ranked 4th behind other central London boroughs – it has dropped one spot behind Islington in 2011.</p> <p>Married couple or same sex civil partnership households: 2001 Greater London = 29% England & Wales = 37%</p> <p>2011 Greater London = 28.1% England & Wales = 33.1%</p> <p>Cohabiting couple households 2001: Greater London = 8.1% England & Wales = 8.3%</p> <p>Cohabiting couple households 2011: Greater London = 8.7% England & Wales = 9.9%</p> <p>Lone parent households 2001: Greater London = 7.6% England & Wales = 6.5%</p>	<p>In line with population, numbers of households fell to 1981 and have been increasing since. 1981 = 70,061 1991 = 80,149 2001 = 91,603 2011 = 97,534</p> <p>Proportion of 1-person households has grown over time, but this is now reversing: 1981 = 40% 1991 = 45% 2001 = 46% 2011 = 40.5%</p> <p>Towards the end of the 20th century the average household size had been falling in Camden (from 2.46 in 1961 to 2.02 in 1991). However, the 2001 census was the first to detect a small rise to 2.06, which has been confirmed by a further rise to 2.18 in 2011.</p>	<p>Past trends in households may not reflect recent changes in Camden.</p> <p>Individual household groups are not directly comparable between 2001 to 2011 due to changes in the categorisation.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
		<p>Lone parent households 2011: Greater London = 12.6% England & Wales = 10.7%</p> <p>Other households 2001: Greater London = 12.2% England & Wales = 6.7%</p> <p>Other households 2011: Greater London = 10% England & Wales = 7.9%</p>		
<p>Population Density (persons/ha)</p> <p><i>2011 Census</i></p>	<p>Camden has a population density of 101 persons/ha (2011 census, see map 6).</p> <p>By ward the variation is: 1 Kings' Cross = 194 pers/ha 2 Kilburn = 176 pers/ha to 17 Hampstead Town 46 pers/ha 18 Highgate = 34 pers/ha</p>	<p>Based on 2011 census figures the national average is 3.7/ha and in London 52/ha.</p> <p>In 2001 Camden was ranked 7th most densely populated administrative area in both London and England & Wales, in 2011 Camden was ranked 8th.</p>	<p>Trend in density tends to follow population.</p>	<p>Increasing population density is necessary to accommodate the projected population growth for the borough. However, increasing density need to be taken into account when planning to maintain appropriate levels of amenity for existing and</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints																
				future residents.																
<p>Population Growth:</p> <p><i>ONS Mid 2012 Population Estimates (MYEs) TAP 2013-01</i></p> <p>Interim projections, 2011 - 2021</p> <p>GLA 2012 Round of Demographic Projections</p> <p><i>Please note that these figures are constrained to housing trajectory, if unconstrained figures are published by the GLA the baseline will be updated</i></p>	<p>2011 = 220,087</p> <p>ONS Interim projections, 2011 – 2021, Camden population forecast to increase by 40,738 –</p> <table border="0"> <tr> <td>2011 – 2016</td> <td>24,396</td> </tr> <tr> <td>2016 – 2021</td> <td>16,342</td> </tr> </table> <p>(*The interim projections are based on the 2011 Census population, however the trend rates for Camden were based on populations that proved to be 8% too high.)</p> <p>The GLA round 2012 projections forecast an increase in the same period of 24,111 (constrained by housing trajectory)</p> <table border="0"> <tr> <td>2011-16</td> <td>15,409</td> </tr> <tr> <td>2016-21</td> <td>8,702</td> </tr> <tr> <td>2021-26</td> <td>7,202</td> </tr> <tr> <td>2026-31</td> <td>1,892</td> </tr> <tr> <td>2031-36</td> <td>1,897</td> </tr> <tr> <td>2036-41</td> <td>1,856</td> </tr> </table>	2011 – 2016	24,396	2016 – 2021	16,342	2011-16	15,409	2016-21	8,702	2021-26	7,202	2026-31	1,892	2031-36	1,897	2036-41	1,856	<p>Under the NPPF, we are required to plan for full objectively assessed needs.</p>	<p>Future growth in Camden is mostly due to natural increase, i.e. births outstripping deaths, to give a net population increase due to natural change of 29,000 during 2013-26, while net migration contributes a net loss of 2,700</p> <p>Natural change has been gradually increasing in Camden, up from 1,400 in 2001-2002 to almost 2,000 people in 2011-2012. This continues a process that has been building from the early 1980s when, for the first time since the end of the 1960s ‘baby boom’ annually there were more births than deaths in Camden.</p>	<p>NOTE: Can't directly compare 2001 and 2011 Census in terms of absolute numbers due to undercount later detected in 2001. To compare overall population (age/sex) use the ONS mid-year estimates. When comparing characteristics, it is best to use proportions (%).</p> <p>Assuming projections are correct reflect increased needs and pressures for housing and local services in the Local Plan.</p>
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SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>Household Projections</p> <p><i>GLA Demographic Projections 2012</i></p> <p><i>Please note that these figures are constrained to housing trajectory, if unconstrained figures are published by the GLA the baseline will be updated</i></p>	<p>The GLA forecast shows an increase of 15,200 (15%) during 2013-26.</p>	<p>None identified.</p>	<p><i>Past trend:</i> Projections of households were prepared by the GLA for the original <i>London Plan</i> (2004) that showed household growth of 9% 2006-16. GLA projections prepared for the Review of the London Plan (2007) show a lower level of household growth: <i>RLP Low gives 6.2% growth 2006-16 and 11.2% growth 2006-21.</i></p> <p>Future: By magnitude, the largest components of the rise are due to growth in multi-person households, couple and one-person households. Government trend-based projections (unconstrained by housing capacity) show similar increases in population, but over a shorter period of time.</p>	<p>Past trends built into household projections may not reflect the recent changes in Camden.</p>
<h2>Deprivation and social exclusion</h2>				
<p>Household Income</p> <p><i>CACI Ltd</i></p>	<p>Camden has a mean annual household income of £40,815 a slight increase as compared to 2007 of</p>	<p>Camden's mean annual household income of £40,815 is higher than the Greater London average of £38,795 and well above the Great Britain</p>	<p>Figure 6 illustrates that the % of households in Camden subjected to fuel poverty reached a peak between</p>	<p>While Camden's mean annual household income is higher</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<i>PayCheck 2013</i>	<p>£39,040</p> <p>14.3% of Camden households earn under 15k</p> <p>19.1% of Camden households have an annual income of £60,000 and over</p> <p>Mean Incomes at ward-level show the lowest income level is in St Pancras and Somers Town ward with £29,353 compared to the highest mean income in Frognal and Fitzjohns ward with £51,613. This information has been produced from modelled data using census, survey and lifestyle info.</p>	<p>average of £33,814</p>	<p>2009/10 at 13%, compared to the national average of 18%. This figure has since decreased but is not as low as previous years, in 2003 this was approximately 5%.</p>	<p>than that of Greater London's average, there is significant disparity between wards within Camden.</p>
<p>No of Super Output Areas (SOAs) within the 10% most deprived in England</p> <p>Index of multiple deprivation 2010</p>	<p>At 2010 Camden is ranked 55 out of the 326 districts in England in terms of average deprivation.</p> <p>Ward IMD average scores: Lowest: Hampstead Town 12.17 (followed by: Frognal & Fitzjohns; Belsize; Bloomsbury; and Fortune Green) Highest: St Pancras and</p>	<p>Out of 33 local authorities, Camden is the 14th most deprived borough in Inner and Greater London.</p> <p>Camden has 133 Lower –level Super Output Areas. Of these 3 fall within the 10% most deprived LSOA's in England. The 2 most deprived LSOA's are within Gospel Oak ward, the 3rd in Regents Park. For the first time Camden has LSOA's that fall within the 20% least deprived areas in</p>	<p>Overall Camden is less deprived according to the indices of deprivation 2010, compared to the previous set in 2007</p> <p>There are very wide disparities within the Borough and wards.</p>	<p>Note/reflect levels of deprivation and local ward disparity.</p> <p>The Indices of Deprivation 2010 was an LSOA level set to reflect the fact that deprivation</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>Somers Town 37.48 (followed by: Kilburn; Haverstock; Regents Park; and King's Cross)</p> <p>See map 7.</p>	<p>England (Hampstead Town, Highgate and Fortune Green wards).</p>		<p>is often found in small clusters.</p>
<p>Life expectancy</p> <p><i>Public Health Outcomes Framework 2013 - 2016</i></p>	<p>Camden males – 80.5 Yrs Camden females – 85.4 Yrs (males & females significantly higher than London and England averages) see figure 7.</p> <p>London males – 79.7 England – 79.2 London females – 83.8 England - 83.0</p> <p>Gap in life expectancy between the least and most deprived 10% of the local population 2009-11: Camden males – 10.8 Camden females – 9.9</p>	<p>Life expectancy is significantly higher than the last SA of the LDF in 2007 where, in Camden, men lived on average to 74.3 years and women on average to 80.6 years.</p>	<p>Males +0.6 yrs from 2009-11 Females +0.4 from 2009-11</p>	<p>There is a need to consider the health issues behind these figures.</p>
<p>Claimant count unemployment rate</p> <p><i>Jobcentre plus/GLA</i></p>	<p>Camden Job Seekers Allowance (JSA) rate claimants over 1 year = 32.1% October 2013 Greater London = 31.8% England = 31.2%</p>	<p>4.0% in Camden 4.8% in Greater London 4.3% in England & Wales</p> <p>In Greater London, Camden is ranked 18 – Tower Hamlets is ranked the</p>	<p>Camden has a below average claimant count compared with Greater London and the national average.</p> <p>Claimant count unemployment</p>	<p>Unemployment and job opportunities for local people are key concerns that the DPDs</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<i>Claimant Count October 2013</i>	See figure 13.	highest 1 and Richmond Upon Thames is the lowest 33. Ward variations are wide.	rates have been increasing since the SA of the LDF. There is also significant disparity between different wards in Camden, in that some wards in Camden rank very high in unemployment, whereas others rank very low, showing a clear socio- economic divide in the borough	need to address. As it only covers JSA claimants, it does not include people who are ineligible for or unwilling to claim JSA. A comparison of the indicators suggests JSA claimants could account for just over half of all unemployed people in Camden.
Unemployment by Ward and Sex <i>Camden Wards Ranked by Claimant Count Unemployment Rate by Sex (October 2013)</i>	Camden wards claimant count show wide variations with St Pancras & Somers Town at 7.2% (followed by Kilburn and Haverstock) with Hampstead Town at 1.1%. The JSA numbers for women are two thirds those for men (67%). Looking at the rates, the rates for women are 1 percentage point lower	No comparators	Men and women are generally affected differentially by unemployment and geographically.	There is significant disparity between unemployment in different wards in Camden, in that some wards in Camden rank very high in unemployment, whereas others rank very low,

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>(3.5%) than for men (4.5%).</p> <p>Though there are exceptions: Hampstead Town (men 1.0% and women 1.3%) Haverstock which is equal.</p>			<p>showing a clear socio-economic divide in the borough.</p>
<p>Long-term unemployment (% of unemployed who have been out of work for over one year)</p> <p><i>ONS/JSA Claimant count November 2013</i></p>	<p>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.k</p>	<p>None identified.</p>	<p>None identified.</p>	<p>Unemployment and job opportunities for local people are key concerns that the Local Plan will need to address.</p>
<p>Households with children in families on Key Benefits</p> <p><i>Department of Work and Pensions (DWP) December 2013</i></p>	<p>In February 2013 there were 21,480 benefit claimants of working age in Camden. Of these 7,860 have no child dependants, with 13,630 with dependent children (63.5%).</p>	<p>Of benefit claimants in 2013 with dependent children: Greater London 64.2% Great Britain 67.3%</p>	<p>The % of benefit claimants with dependent children has been increasing from 47.9% in 2008 to 63.5% in 2013. Camden is below the average for Greater London and Great Britain.</p>	<p>Childhood poverty needs to be tackled alongside adult employment levels.</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<h1>Housing</h1>				
NB see also Population indicators for household size and composition and household projections				
Housing stock				
Housing Stock total and by Tenure <i>Census, 2011</i>	By tenure: <ul style="list-style-type: none"> • 33% of Camden households are owner occupiers; • 23% rented from the Council; • 10% rented from a Housing Association or other social rent provider; • 31% rented from a private landlord and letting agency; • 2% rented privately from others; and • 2% lived rent-free. 	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%). Camden has a much higher percentage of social and privately rented accommodation than outer London (17.9% and 21.1% respectively) and Greater London (24.1% and 25.1% respectively).	The percentage of owner occupiers tripled between 1961 and 1991, but has now stabilised and started to fall at 33% compared with 35% in 2001 and 34% in 1991. Renting from the Council dropped from 34% in 1991 to 23% in 2011. Private renting is now growing rapidly from 23% in 2001 to 31% in 2011.	The reduction in Council and rental housing and the growth in private renting represent a reduction in the affordability of stock and security of tenancies, both key sustainability issues.
Traveller pitches <i>Camden, Placeshaping</i>	There are 2 Council owned and managed traveller sites in the borough: <ul style="list-style-type: none"> - 96 Castlehaven Street, x1 pitch - 105 Carol Street, x4 pitches 	None identified.	None identified.	Numbers across London are difficult to identify and the 2008 London wide needs assessment is

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	There is a privately owned site at North Fairground, Vale of Health for travelling showpeople, which is not managed by the Council.			outdated
Dwellings by type <i>Census 2011</i>	Housing stock by type in Camden: 1.9% detached house 4.1% semi-detached house 8.8% terraced house 52.3% purpose built flats 29.8% part of a converted or shared house 3.1% in a commercial building 0.1% caravan or other mobile structure	Camden has the largest proportion of converted or shared houses in inner London, 29.8% compared to a 19.6% inner London average.	Most Camden dwellings are flats, either purpose built or converted from a house or other building.	A large proportion of housing in Camden is either converted or purpose built flats – we need to ensure that the quality of accommodation (building for life, green spaces etc) meets required standards.
Housing need				
<i>Overall need</i> <i>The 2013 London Strategic Housing Market Assessment</i>	An objective assessment of housing need for Camden has been produced on the same basis as the 2013 London Strategic Housing Market Assessment, and shows an annual need of 1,073 additional homes per year in Camden, equivalent	Draft Alterations to the London Plan 2014 indicate a requirement of 49,000 additional homes across London per year from 2015 to 2035. Draft Alterations to the London Plan 2014 also set capacity-based average annual housing supply monitoring targets for 2015-2025, with an overall	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, exceeding Camden's identified need for 1,073 additional homes per	The identified capacity for additional housing across London and in Camden currently falls short of the objectively

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<p><i>The London Plan Housing Land Availability Assessment 2013</i></p> <p><i>Camden Monitoring Bulletin 1 (Housing and employment space) and Camden's Housing Trajectory for 2013/14</i></p>	<p>to a total of 16,100 from 2015/16 to 2030/31.</p>	<p>London target of just over 42,000 per year, and a Camden target of 889 per year.</p> <p>Camden Core Strategy 2010-2025 set an annual target of 595 additional homes, based on 437 additional self-contained homes, 59 vacant homes returned to use, and 100 non self-contained homes.</p>	<p>year, 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>	<p>assessed need for additional homes, so we will need to make the best possible use of all available sites and seek to identify additional sources of supply.</p>
<p>House price</p> <p><i>Transactions received by Land Registry between January 2008 – August 2013</i></p>	<p>House prices in Camden in August 2013 were: £1,943,195 detached £1,438,511 semi-detached £1,090,538 terraced £599,300 maisonette/flat £680,697 ALL</p>	<p>House prices for Greater London were considerably lower: £686,088 detached £399,020 semi-detached £355,760 terraced £349,148 maisonette/flat £389,066 ALL</p> <p>Compared with England & Wales All £164,654.</p>	<p>Financial years 2008/09 witnessed a 15% fall in house prices in Camden and Greater London however from 2009/10 – 2012/13 there has been no further fall in prices and the % increase has been significantly higher than Greater London (12.3% in Camden 5.4% Greater London)</p>	<p>The cost of housing in Camden relative to income is a major issue and increases the need for affordable housing.</p>
<p>Ratio of average house price to earnings</p>	<p>The ratio of median house prices to median earnings for Camden in 2012 was 13.7 (ie median house prices are 13.7 times median earnings).</p>	<p>This compares with 9.71 for Inner London, 8.49 for Outer London, 8.60 across London overall, and 6.74 across England.</p>	<p>From 1997 to 2012, the Camden ratio rose from 6.65 to 13.70, the London ratio rose from 3.98 to 8.60 and the England ratio rose from 3.54 to</p>	<p>The cost of housing relative to income is a major issue for Camden.</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<i>DCLG/ Land Registry 2014</i>			6.74.	
<p>Rents</p> <p><i>London Rents Map based on VOA data for the 12 months to December 2013.</i></p>	<p>Camden weekly median rents (market) in 2013 were:</p> <p>Room - £150 Studio - £240 1 bed - £330 2-bed - £425 3-bed - £580 4-bed + - £750</p>	<p>Weekly median rents (market) across Greater London in 2013 were much lower:</p> <p>Room - £109 Studio - £194 1 bed - £260 2-bed - £323 3-bed - £369 4-bed + - £560</p>	<p>In Dec 2003, average weekly rents in Camden (based on the Camden Housing Needs Survey 2004) were:</p> <p>Room/ studio – no figures 1-bed - £232 2-bed - £315 3-bed - £445 4-bed - £482</p> <p>Comparing this with the 2013 data suggests that in the last 10 years Camden rents have increased by 42% for a 1-bed property and 30% for a 3-bed property.</p> <p>Directly comparable data for other areas is not available, but from May 2005 to May 2013, private rents in London rose 11% and private rents across England rose 8.4% (ONS 2013, 'Index of Private Housing Rental Prices, Historical Series').</p>	<p>The rapid rise in market rents puts further pressure on the affordable housing stock in the context of house prices that are beyond the reach of households at or below the median level of income.</p>
<p>Number/ proportion of households needing</p>	<p>In 2008, it is estimated that the need for additional affordable homes (including a steady reduction in the</p>	<p>Limited comparable data is available. The GLA published the London & sub-regional strategy support studies project in 2005, which estimated that</p>	<p>Not identified. The basis of calculating affordable housing need has not been consistent over time.</p>	<p>Data is not strictly comparable over time or at</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>affordable housing per annum.</p> <p><i>Camden Housing Needs Survey Update 2008</i></p>	<p>existing backlog) was 4,876 per annum. The gross existing (backlog) need was estimated as 6,759 homes, equivalent to 7% of all Camden's households.</p> <p>On the basis of a "balanced housing market" model, the 2008 study estimated that affordable home requirements were 314 homes or 52.8% of the (then) annual housing monitoring target of 595 additional homes per year.</p>	<p>for London overall the gross existing (backlog) need for affordable homes was 62,986 - equivalent to 2% of all London's households.</p> <p>The Greater London Strategic Housing Market Assessment 2008 examined a number of different scenarios. The accepted measure of affordable housing need over 10 years was 36,500 intermediate homes plus 145,600 social rented homes, effectively 18,200 affordable homes per year. In this scenario, the affordable housing requirement represented 55.9% of the overall requirement for 32,570 additional homes per year.</p>		<p>different scales, but does indicate that more than half of the need for additional housing in Camden and in London is from households who are unable to afford market housing.</p>
<p>Number/ proportion of traveller households needing pitches</p> <p><i>Gypsy and Traveller Accommodation Needs Assessment, 2014</i></p>	<p>The Carol Street site (four pitches) is occupied by an extended family and is severely overcrowded.</p> <p>The Castlehaven site is also restricted to one pitch – lack of space for family members.</p>	<p>The needs assessment has identified a need for up to 16 pitches by 2031.</p>	<p>None identified.</p>	<p>The provision of traveller accommodation is a key issue for Camden.</p> <p>The assessment of need is difficult in the absence of needs assessment by other London authorities.</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
Number of students requiring housing	As noted above, the borough is home to the largest population of higher education students in London, with 24,300 domestic and foreign students living in the borough and enrolled at publicly funded higher education institutions (HESA 2012-13). 31% live in halls of residence or flats. More than a third of students (42%) are located in the area south of Euston Road.			There is uncertainty as to the levels of future growth in student numbers.
Number/ proportion of households in unsuitable housing - overcrowded	In 2008, it is estimated that 11,906 Camden households were in unsuitable housing (12.7% of all 93,849 households). In 2008, it is estimated that 5,540 Camden households were living in housing that	Limited comparable data is available. The GLA published the London & sub-regional strategy support studies project in 2005, which gave the following estimates for London overall: 481,205 households in unsuitable housing (15.5% of all 3,103,724 households); 210,114 households in overcrowded housing (6.8% of all households), including 35,120 severely	GLA analysis of 2001 and 2011 Census data suggests that proportion of overcrowded	The data suggests that overcrowding affects a similar proportion households in Camden as across London, and disrepair affects a higher proportion of households in Camden. Although the level of overcrowding in

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>- home in major disrepair</p> <p><i>Housing Needs Survey 2008</i></p>	<p>was unsuitable due to overcrowding (46.5% of all households in unsuitable housing, 6% of all households).</p> <p>In 2008, it is estimated that 3,660 Camden households were living in housing that was unsuitable due to major disrepair (30.7% of all households in unsuitable housing, 3.9% of all households).</p>	<p>overcrowded households; 125,034 households in unsuitable housing on the basis that they stated their house was too small (26.0% of households in unsuitable housing – but not a technical assessment of overcrowding);</p> <p>113,978 in housing that was unsuitable due to major disrepair (23.7% of all households in unsuitable housing, 3.7% of all households).</p> <p>Camden Core Strategy 2010-2025 indicates an aim for Council homes to meet Decent Homes standards by 2012.</p>	<p>households in London has risen from 17% to 22% up to 2011 based on all rooms. Based on bedrooms, London in 2011 had 12% of households overcrowded, compared with 5% in England and Wales. Camden had slightly more overcrowding than across London, affecting 12.5% of households. Camden particularly suffered from overcrowding in the social rented sector, with 20% of households in this sector overcrowded in 2011. The LB Camden Stock Condition Survey Report indicated that 11,278 Council-owned homes (47.5% of the tenanted stock) failed to meet Decent Homes standards. This compares with a national average failure rate of 33.7% (English House Condition Survey Headline Report; CLG, Jan 2007). By 1st April 2012, Camden's return to the English Local Authorities Statistics on Housing (ELASH) indicated that only 8,420 Council-owned homes still failed to meet</p>	<p>Camden is typical of London, the level is high compared with England and Wales, and is a major issue as it is related to other aspects of quality of life such as educational performance and health.</p> <p>No up-to-date information has been identified indicating the condition of privately owned stock or Housing Association stock, or changes in their condition over time.</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>Households with special needs:</p> <p>- Number of households including disabled person/s</p> <p>- Number of households including frail/ elderly person/s</p>	<p>In 2008, it is estimated that Camden had 8,833 households that included one or more people with special needs (9.4% of all households) (including 490 households where more than one person has special needs and 2,244 households where at least one person has multiple special needs)</p> <p>In 2008, it is estimated that 5,972 Camden households contained someone with a physical disability (6.4%), 540 Camden households contained someone with a learning disability (0.6%), and 390 households contained someone with a severe sensory disability (0.4%).</p> <p>In 2008, it is estimated that 3,155 Camden households (3.4%) contained a frail elderly person.</p>	<p>Limited comparable data is available. The GLA published the London & sub-regional strategy support studies project in 2005, which gave the following estimates for London overall:</p> <p>412,378 London households (13.3%) estimated to contain someone with special needs;</p> <p>253,727 London households (8.2%) estimated to contain someone with a physical disability;</p> <p>25,673 London households (0.8%) estimated to contain someone with a learning disability;</p> <p>49,658 London households (1.6%) estimated to contain a severe sensory disability;</p> <p>110,929 London households (3.6%) estimated to contain a frail elderly person;</p>	<p>Decent Homes standards.</p> <p>Not identified. LBs Camden and Islington intend to commission a Strategic Housing Market Assessment to provide more up-to-date information for the each borough.</p>	<p>Data is often not comparable over time or across boroughs.</p> <p>The number of households containing people who are disabled or frail elderly may be relatively low in Camden due to the high the proportion of young households and high proportion of migrants.</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>- Number of households including a person with a mental illness</p> <p>- Number whose housing is unsuitable due to special needs</p> <p><i>Camden Housing Needs Survey Update 2008</i></p>	<p>In 2008, it is estimated that 819 Camden households (0.9%) contained a person with mental health issues.</p> <p>In 2008, it is estimated that 1,700 households were living in housing that was unsuitable due to a special need or the need for mobility-related adaptations (14% of all households in unsuitable housing).</p>	<p>48,986 London households (1.6%) estimated to contain a person with mental health issues;</p> <p>57,765 London households were estimated to be in unsuitable housing due to a mobility difficulty (12% of all households in unsuitable housing) but in addition 6,586 (1.4%) needed supported housing and 29,324 households (6.1%) contained someone needing to give or receive care/ support in the household.</p>		
<p>Number of Homeless Households</p> <p><i>Housing Strategy Evidence Base 2011</i></p>	<p>The Housing Strategy Baseline Evidence identified:</p> <ul style="list-style-type: none"> In 2000 59 people were sleeping rough in Camden and this is now much lower to 10 in November 2010. The number of households accepted as eligible, unintentionally homeless and priority need by Camden = 98 Approximately 1,500 people approach the 	<p>In 2004/05 the number of households accepted as eligible, unintentionally homeless and priority need by Camden were 1,148 and has since been decreasing to 98 in 2009/10.</p>	<p>Trends in levels of statutory homelessness across London have also been downward, although the decline has been much less steep than in Camden. The total number of households London authorities accepted a duty to accommodate in of 2004/05 was 25,387. In 2009/10, the figure was 8821.83 So, the total number of households to whom authorities across London accepted a duty was accepted in 2009/10 was</p>	<p>Supports the provision of affordable housing to accommodate these households.</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	Council per year because they are experiencing problems with their housing.		34.7% of the 2004/05 number.	
Housing supply				
<p>Number of new homes completed (net)</p> <p>- comparison with London Plan targets</p> <p>AMR 2012/13</p>	<p>566 additional self-contained homes were completed in the 2012/13 financial year. There was a reduction of 103 in the number of dwellings vacant for more than 6 months, effectively returning these homes for use. There was a net loss of 21 non-self contained homes (hostel bedrooms).</p> <p>See figure 14 for Camden housing trajectory, 2013.</p>	<p>Camden Core Strategy 2010-2025 sets an annual target of 595 additional homes, based on 437 additional self-contained homes, 59 vacant homes returned to use, and 100 non-self contained homes.</p> <p>The London Plan 2011 increases the target to 665 per annum based on 500 self-contained homes and 165 non-self contained homes.</p> <p>The overall supply of completed homes for 2008/09 to 2012/13 exceeds Core Strategy and (in later years) the London Plan 2011 targets, as does the supply of self-contained homes.</p> <p>Check relationship between Camden AMR and Government figures for vacant homes - Table 615: vacant dwellings by local authority district: England, from 2004.</p> <p>In 2012/13, Camden did not meet the</p>	<p>Camden met the target for self-contained homes over the period 1 Apr 2008 to 31 Mar 2013, although the annual target was missed in 2009/10 and 2011/12. This partly reflects the 'credit crunch' around 2009/10, and partly reflects the predominance of flatted development in Camden which supplies homes in discrete phases rather than a steady flow.</p> <p>The number of Camden homes vacant for more than 6 months increased from 544 in 2008/09 to 639 in 2010/11, but has since dropped dramatically, reflecting the tightness of the housing market. Government published figures for long-term vacant dwellings were 1,125 in Oct 2008 and 1,286 in 2013.</p> <p>Camden did not meet the</p>	<p>The Mayor published draft Further Alterations to the London Plan in January 2014. These alterations introduce a greatly increased projection of new housing need and introduce challenging new targets for boroughs across London.</p> <p>Increasing</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
		Core Strategy or London Plan targets for additional non-self contained homes, registering a net loss.	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.	housing supply to meet the new projections creates a significant sustainability challenge for densely developed boroughs like Camden. Failure to increase supply in line with projections would increase social polarisation and detract from the sustainability of Camden's communities.
Number of new traveller pitches completed	Gypsy and Traveller and Travelling showpeople accommodation assessment 2014 identified a need for up to 16 additional pitches by 2031.			
Student housing, completions <i>LBC Annual</i>	Camden: From 1 April 2008 to 31 March 2013 we recorded 303 new additional non self-contained housing units in	For the period 2008-2012 borough approvals - Brent 660 pa, Lambeth 520 pa, Hackney 390 pa, Ealing 380 pa, Newham 356 pa, and Hammersmith & Fulham 270 pa.	London: In the period 2000–2007 student housing output was varied but averaged 1,630 bedspaces pa. Since then	The universities and students consider affordability to be the key issue

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p><i>Monitoring Report 2012/13</i></p> <p><i>Camden Student Housing Report 2009</i></p> <p><i>Mayor's Academic Forum, Strategic planning issues for student housing in London, March 2014</i></p>	<p>Camden, mostly from student accommodation. During the same period there was an overall net loss of 565 hostel bedrooms and a gain of 868 student bedrooms. During 2012/13, there were no new student bedrooms completed and 21 hostel bedrooms were lost from the borough supply of hostel bedrooms.</p> <p>As of 1 April 2013 there were 3,045 unimplemented student bedrooms in the Borough.</p>	<p>There remains considerable pressure on the more established providers of student accommodation such as Camden 740 pa, Tower Hamlets 650 pa, Southwark 640 pa and Islington 590 pa.</p>	<p>output has been more consistent and averaged 2,420 bedspaces pa ie above the mid-point of the London Plan requirements range 1,800 - 2,700 pa. In the period 2000-2012, some 26,000 new places were completed and 45,600 were approved.</p>	<p>in student housing provision in London.</p>
<p>Number of affordable housing completions</p> <p><i>AMR 2012/13</i></p>	<p>In 2012/13, 299 net affordable dwellings were completed, 53% of all net additional homes completed in the Borough. See figure 15.</p>	<p>The Council's overall target for affordable housing is 50% of the target for additional self-contained homes. This amounted to 220 additional affordable homes per year under the London Plan as it stood in 2008, and rose to 250 affordable homes per year under the London Plan 2011.</p> <p>The Council expects residential</p>	<p>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.</p>	<p>Planning has a key role to playing securing affordable housing for low and moderate-income households.</p> <p>Delivery of housing and the</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
		<p>developments with capacity for 10 or more additional homes to make a contribution to the supply of affordable housing. The Council negotiates on the basis of a target of 50% affordable housing for each development.</p> <p>96% of affordable homes completed 2012/13 were in schemes of 10 dwellings or more.</p>		<p>overall proportion of completed affordable housing can show significant swings from one year to another. The fluctuations are due to different number and size of schemes brought forward by the developers each year.</p>
<p>Mix of housing sizes (gross)</p> <p><i>AMR 2012/13</i></p>	<p>38% of all self-contained homes completed in 2012/13 had one-bedroom, 38% had two bedrooms, 17% had three bedrooms and 6% had four or more bedrooms. Overall there is a good mix of housing sizes across all tenures.</p> <p>34% of social rented completions and zero intermediate housing completions in 2012/13 were</p>	<p>Camden's Development Policies 2010 aim to secure a range of suitable housing types, as well as a range of tenures - at least 50% of social rented dwellings and 10% of intermediate affordable dwellings to be large homes with 3-bedrooms or more, and at least 40% of market housing to contain 2-bedrooms.</p> <p>In 2012/13, Camden was unable to meet its target for large social rented and intermediate homes, but met the target for 2-bedroom market homes.</p>	<p>There is little variation between the mix of dwelling sizes from 2008/09 to 2012/13.</p>	<p>There continues a need to ensure the delivery of a range of housing to meet the needs of Camden's existing and future households and to ensure sustainable communities.</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	made up of 3 or more bedrooms (large homes). 44% of market housing completions in 2012/13 were 2-bedroom homes.			
Vacant Residential Units <i>AMR 2012/13</i>	According to Camden's Housing Strategy Statistical Appendix 2013, as at 1 st April 2013 there were 210 properties that have been vacant for more than 6 months.	None identified.	The number of Camden homes vacant for more than 6 months increased from 544 in 2008/09 to 639 in 2010/11, but has since dropped dramatically, reflecting the tightness of the housing market.	Further reduction of vacant units need to be pursued. This will help to alleviate demand for new housing to some extent, though will certainly not remove the need.
Number/ proportion of all new housing units permitted - designed to meet Lifetime Homes Criteria -designed to Wheelchair Housing	In 2012/13, 1,072 out of the 1,371 homes that were permitted in the borough proposed to comply with all Lifetime Homes criteria. In 2012/13, 149 permitted homes (11% of the total 1,371 homes permitted) proposed to either meet wheelchair housing	Target is for all new housing to meet Lifetime Homes criteria. Target is for 10% of new housing to either meet wheelchair housing standards or be easily adaptable to meet them.	None identified.	Need to note/reflect on issues in relation to design of housing and accessibility standards. The design or nature of some existing properties means that it will

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
standards or easily adapted to Wheelchair Housing standards <i>AMR 2012/13</i>	standards or are to be easily adaptable to meet them.			not be possible to meet every element of the Lifetime Homes criteria.
Town Centres and Employment				
Vacancy in town centres and other designated frontages <i>Camden Annual Retail Frontages Survey, 2013</i> <i>Camden Retail Town Centre Study, 2013</i>	Camden has experienced increasing vacancy rates and a loss of retail uses in its centres, although at much lower rates than the national and London wide levels with vacancy rates of approximately 7.7%. The vacancy rates on designated shopping frontages across the borough rose from 5.4% vacant in 2007 gradually up to 7.7% in 2012, with 2013 being the first year of recorded improvement since	In the period 2008-2011 town centre vacancy rates across Great Britain increased from 5% to 14.5%. In comparison to national figures London has a lower level of vacancy at 10.2% (2011).	2013 saw a reduction in vacant premises on Camden's protected shopping frontages - contrary to the national and London wide trends of increasing vacancy rates. The percentage of vacant premises on Camden's protected shopping frontages dropped from 7.7% in 2012 to 6.4% in 2013.	Vacant units are a reflection of town centre health. The Council aims to have as few vacant units as possible. Note: a small proportion of vacant units (around 5%) is seen as normal due to redevelopment and churn.

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	comparable records began in 2007. See figure 16.			

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>Retail and food, drink and entertainment uses</p> <p><i>Camden Annual Retail Frontages Survey, 2013</i></p>	<p>The proportion of A1 shops in protected frontages in Camden over the period 2007 to 2013 changed from 47% to 43% – a net reduction in 156 A1 shops. There are 4,153 shops on protected retail frontages in the borough. In the last year this trend continued with the number of shops changing 44.0% (2012) to 43.3% (2013) – a net reduction of 26 shops.</p> <p>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. In the last year this trend continued but much more gradually, with a change from 20.7% (2012) to 20.9% (2013) - a net increase of only 8 premises. See figure 17.</p>	<p>No comparators available</p>	<p>Reflecting national trends, across the borough there has been a longer term and gradual trend toward fewer A1 shops and more food, drink and entertainment uses.</p>	<p>Some of the factors influencing town centres and retailing are the economic downturn, increasing consumer mobility, increasing market share of large retailers and increasing online sales.</p>
<p>Completed retail, food, drink and entertainment</p>	<p>In 2012/13 there was little net change in the A uses overall, the largest being a reduction in 1,506sq m of A4</p>	<p>None identified.</p>	<p>The predominant trend for retail floorspace change in Camden is the redevelopment of mixed use schemes to</p>	<p>It is essential to maintain an appropriate range of</p>

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>floorspace</p> <p>AMR 2012/13</p>	<p>uses (drinking establishments).</p> <p>Most of the reduction in A4 uses was the conversion and redevelopment of public houses to houses and flats. In 2012/13 a total of four pubs were redeveloped to provide 13 homes, and the ancillary accommodation in one pub was converted to provide 3 flats.</p>		<p>provide a similar quantity but higher quality of retail space</p> <p>The yearly results show some variation, affected by a small number of large schemes. In the 5 year period 2008/09 to 2012/13 139 schemes involved a change of A1 shops, but only 11 schemes involved change of more than 500sq m (7 with a net increase of >500sq m, 4 with a net loss of >500sq m).</p>	<p>services across the borough and protect the vitality of existing centres for shopping and services.</p>
<p>Employment floorspace, <i>Completed and available</i></p> <p>AMR 2012/13</p>	<p>There is a good supply of office floorspace projected for development with approximately 526,000sq m net additional office floorspace expected to be created over the plan period. A large proportion of this (approximately 460,000sq m) will be built at King's Cross Central. See figure 18.</p>	<p>None identified.</p>	<p>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.</p>	<p>Camden seeks to ensure 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 Camden's economy and competitiveness</p>

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
				and to provide a diverse range of employment opportunities
<p>Growth Areas projected floorspace</p> <p>AMR 2012/13</p>	<p>Growth Area & indicative employment capacity (jobs) and floorspace:</p> <p>Euston – 5,000 (95,000m²) King's Cross – 25,000 (475,000m²) Tottenham Court Road – 5,000 (95,000m²) Holborn – 2,000 (38,000m²) West Hampstead – 100 (1,900m²)</p> <p>The planning application for King's Cross Opportunity Area (2004/2307/P) accounts for the majority of B1 uplift and loss of B2 industrial and B8 storage and distribution floorspace. Development at King's Cross will result in:</p> <ul style="list-style-type: none"> - 459,909sq m additional B1 business floorspace; - 9,162sq m less B2 general industrial floorspace and - 28,044sq m less B8 storage / distribution floorspace. 	<p>The London Plan allocates employment growth in Opportunity Areas, those which are located in LB Camden are designated as Growth Areas in the Local Development Framework.</p>		<p>Redevelopment anticipated in Camden's Site Allocations policy document have not been included in this calculation because:</p> <ul style="list-style-type: none"> - Many of the redevelopments included will not result in a net increase in employment floorspace. - For those that will, it is difficult to estimate the quantity or composition of floorspace uplift at this stage.

SA Topic/ Indicators and <i>data source</i>	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
<p>Change in VAT registered businesses</p> <p>AMR 2012/13 & Employment Land Study, 2014</p>	<p>Camden has the second largest number of businesses in London (26,400 enterprises), with Westminster having the most (47,010 enterprises). See figure 19.</p> <p>Published data indicates that in 2012 there were 3,140 registrations whilst there were 3,010 de-registrations resulting in a slight net gain in LB Camden's stock of 130 businesses.</p>	<p>Comparatively in 2008 there were 3,035 business registrations compared to 2,205 business deaths resulting in a net gain in LB Camden's stock of 830 businesses.</p>	<p>The number of business in Camden grew by 2.0% in 2012, behind London (9.2%) but ahead of the United Kingdom (1.3%). See Figure 18.</p>	<p>Indicator of economic health and prosperity - VAT registration and de-registration rates for LB Camden provide an indication of the entrepreneurial characteristics of the Borough.</p>
<p>Industrial structure & key sectors</p> <p>Employment Land Study, 2014</p>	<p>The Business Register and Employment Survey (BRES) shows that employment in LB Camden increased from 280,293 in 2009 to 303,874 in 2012, an increase of 8.4%.</p> <p>Key sectors, jobs:</p> <p><i>Professional, scientific & technical</i></p> <p>Most significant employer in the borough, although has seen a slight decrease in the</p>	<p>This is a greater increase in employment compared to North London which saw a rise in employment of 5%, a slightly greater increase in employment compared to Greater London (7.3%) and a significantly greater increase compared to Great Britain as a whole which saw an increase in employment of 0.3%.</p> <p>This trend is in line with North London, there is a slight growth in Greater London and Great Britain.</p>	<p>Noted.</p>	

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
	<p>proportion of employment, based on levels recorded in 2009.</p> <p><i>Business administration and support</i> Has seen one of the largest increases in the proportion of employment, compared to 2009.</p> <p><i>Health</i> Experienced similar levels of growth to the business administration sector.</p> <p><i>Manufacturing and transport storage</i> Experienced the greatest proportionate decreases in jobs of any other sectors. 7,030 jobs were lost in the transport and storage sector, a proportionate decrease at a rate significantly greater than that felt for both Greater London and Great Britain</p>	<p>Level of growth is significantly greater than that recorded in North & Greater London and Great Britain.</p> <p>This sector has a significantly greater increase in growth compared with North & Greater London and Great Britain.</p> <p>Loss of manufacturing jobs was felt at a significantly greater rate than that recorded within North London (-4.4%) and at both regional (-2.3%) and national levels (-3.5%).</p>		
Supply of employment land - Employment	There are 26 identified employment clusters in Camden – and undesignated employment land constitutes	Within the employment clusters there were few advertised vacancies for B1 (a,b,c), B2 or B8 premises. The low vacancy level observed point towards	The ELR forecasts demand for approx. 695,000 sqm (2014-2031), which would largely be met in Opportunity and Growth	Employment clusters information based on

SA Topic/ Indicators and data source	Quantified Data	Comparators and Targets	Trends	Issues/ Constraints
clusters	<p>the majority of employment land in the borough. The majority of employment land being provided are individual employment sites situated within town centre and town centre fringe locations.</p> <p>Although low vacancy levels were observed the survey found that there has been an erosion of employment land by residential uses, notably student accommodation. Conversion to residential uses was found to have occurred mostly in areas of proximity to key transport links and local town centres.</p>	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.	<p>Areas.</p> <p>Demand for local office space is expected to be less than 10%, and likely to occur in Camden Town and Kentish Town.</p> <p>Contraction in demand for industrial and warehousing of 2.2 ha.</p>	Camden Core Strategy (2010), the GLA's Industrial Baseline (2010) and the Council and consultancy team's knowledge.
Number of secured apprenticeship in Camden	A total of 22 apprenticeship places were negotiated in 2011/12 through Section 106 Agreements, an improvement on the 14 places negotiated in 2010/11.	Developers should provide one apprentice per £3m build cost.	None identified.	Data for 2012/13 has not become available yet however this document will be updated when it does.

Appendix 3: Baseline Information Sources and web links

Authority Monitoring Report (AMR) 2012/13 Link
Camden Transport Strategy 2011 Link
See proposals map for: Conservation Areas and Archaeological Priority Zones Link
English Heritage at Risk Register 2013 Link
English Heritage Ancient Monuments Link
Camden Open Space, Sport and Recreation Study, draft March 2014 *To be published later this year.
Camden Biodiversity Action Plan 2013 – 2018 Link
Camden Joint Strategic Needs Assessment 2012 Link
Camden Housing Strategy Evidence Base 2011 Link
Camden's Air Quality Action Plan Link
Public Health Outcomes Framework 2013 – 2016 Link
Camden Open Space Review 2008 Link
Indices of Multiple Deprivation 2010
ONS Mid 2012 Population Estimates (MYEs) TAP 2013-01
Census 2011

GLA 2012 Round of Demographic Projections
CACI Ltd PayCheck 2013
Jobcentre plus/GLA Claimant Count October 2013
ONS/JSA Claimant count November 2013
Department of Work and Pensions (DWP) December 2013
Transactions received by Land Registry between January 2008 – August 2013
DCLG/ Land Registry 2014
London Rents Map based on VOA data for the 12 months to December 2013.
Camden Housing Needs Survey Update 2008 Link
Camden Retail and Town Centre Study 2013 Link

Appendix 4: Baseline tables, maps and figures

Transport and traffic

Figure 1: Change in transport mode in Camden, AMR 2012/13

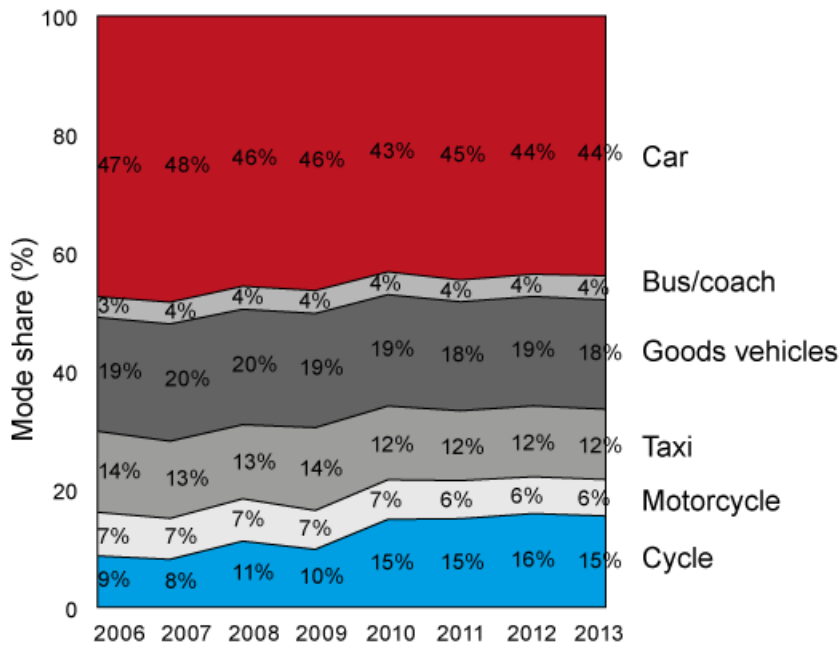
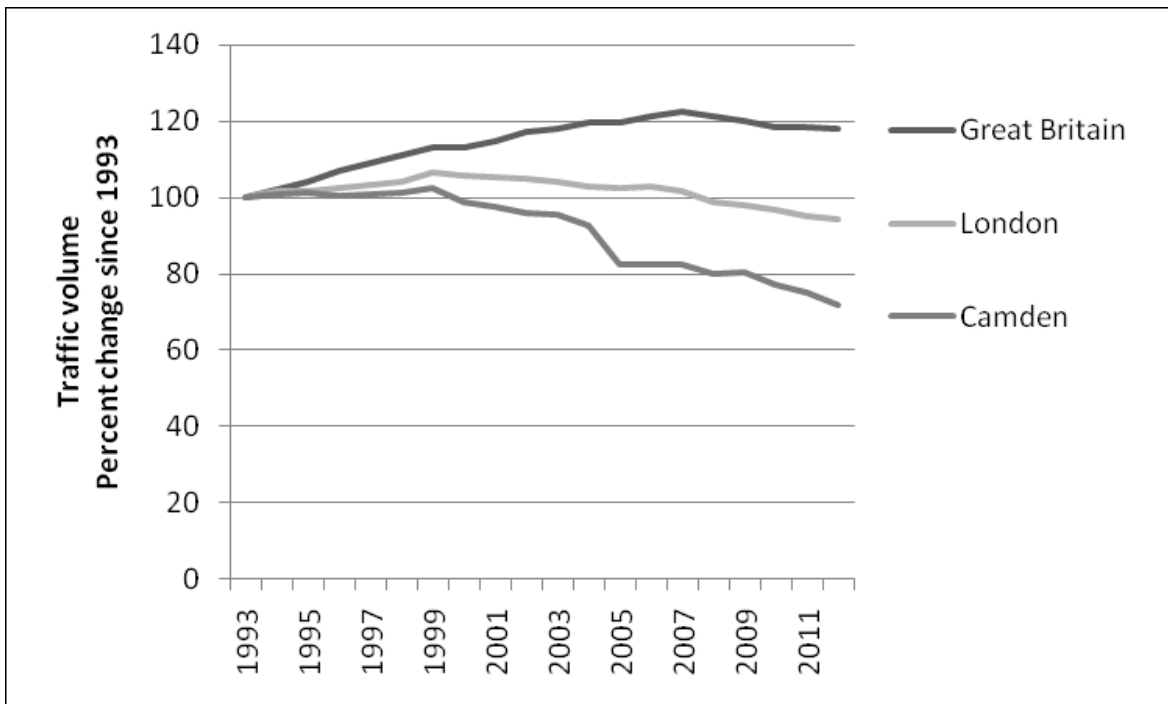
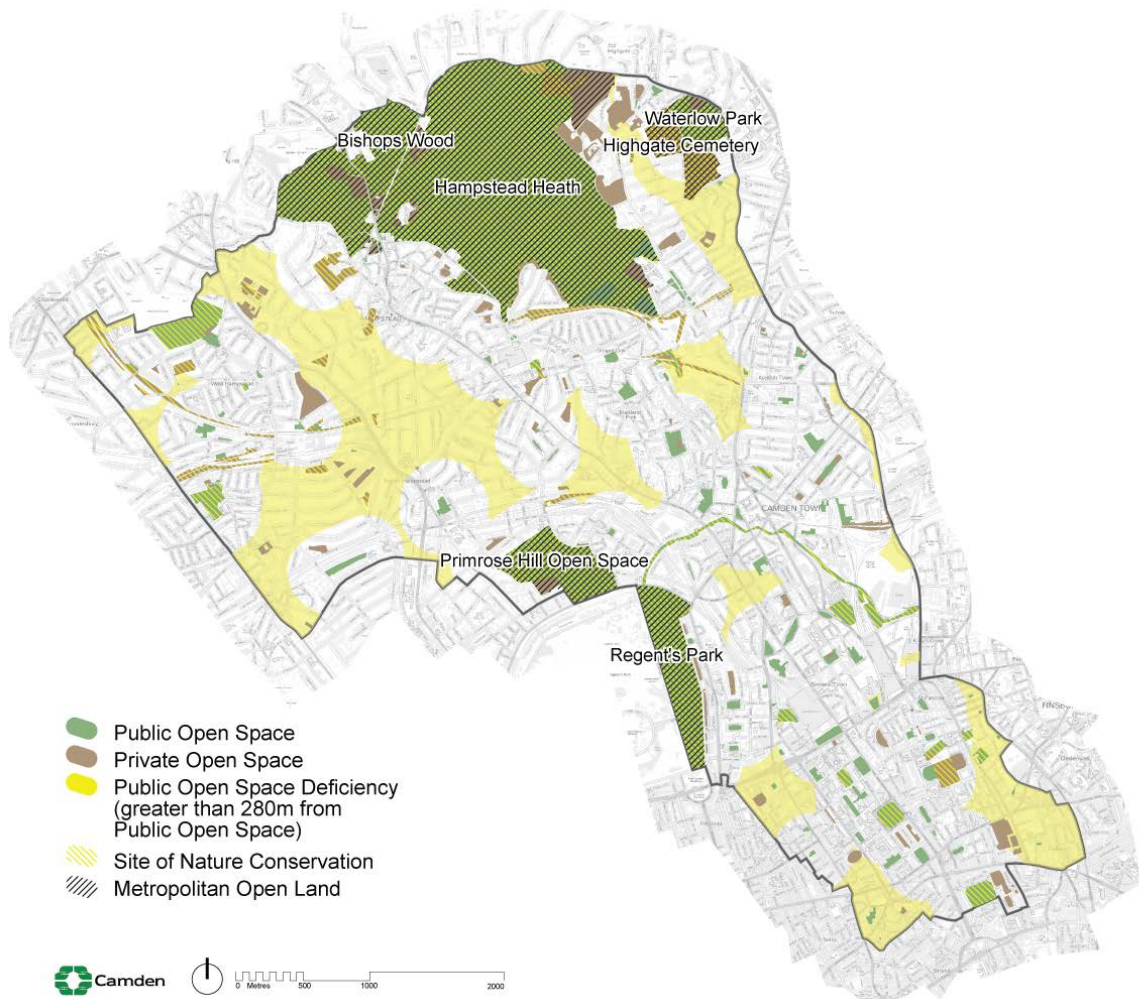


Figure 2: Motor vehicle traffic change, AMR 2012/13



Open space

Map 1: Open spaces in Camden



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Climate factors

Figure 3: Changes in carbon emissions in Camden, Central London and the UK from 2005 – 2011, taken from: Green Action for Change second annual review.

Annual change in CO ₂ emissions			
Year	Camden	Greater London	National
2005	First Year of Data		
2006	↑ +7%	↑ +7%	0%
2007	↓ -3%	↓ -3%	↓ -2%
2008	↓ -2%	↑ +2%	↓ -2%
2009	↓ -10%	↓ -10%	↓ -10%
2010	↑ +5%	↑ +6%	↑ +4%
2011	↓ -9%	↓ -9%	↓ -8%
Total change 2005-2010	↓ -11%	↓ -10%	↓ -17%

Tonnes of CO ₂ per person			
Year	Camden	Central London	National
2005	7.9	8.8	8.7
2006	↑ 8.5	↑ 9.3	↓ 8.6
2007	↓ 8.2	↓ 9.0	↓ 8.4
2008	8.2	↑ 9.1	↓ 8.2
2009	↓ 7.3	↓ 8.1	↓ 7.3
2010	↑ 7.6	↑ 8.6	↑ 7.5
2011	↓ 6.7	↓ 7.6	↓ 6.9
Total change 2005-2010	↓ -15%	↓ -13%	↓ -21%

Air Quality

Figure 4: Sources of Nitrogen oxides in Camden (LEAI data) taken from: Camden's Air Quality Action Plan 2013-2015

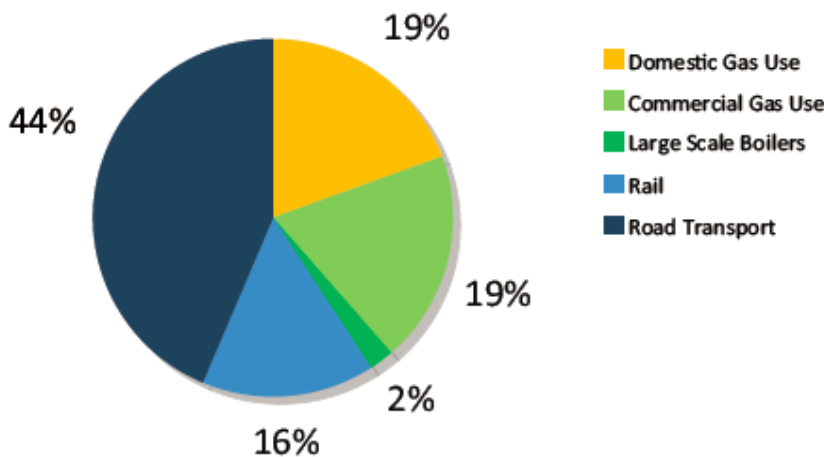
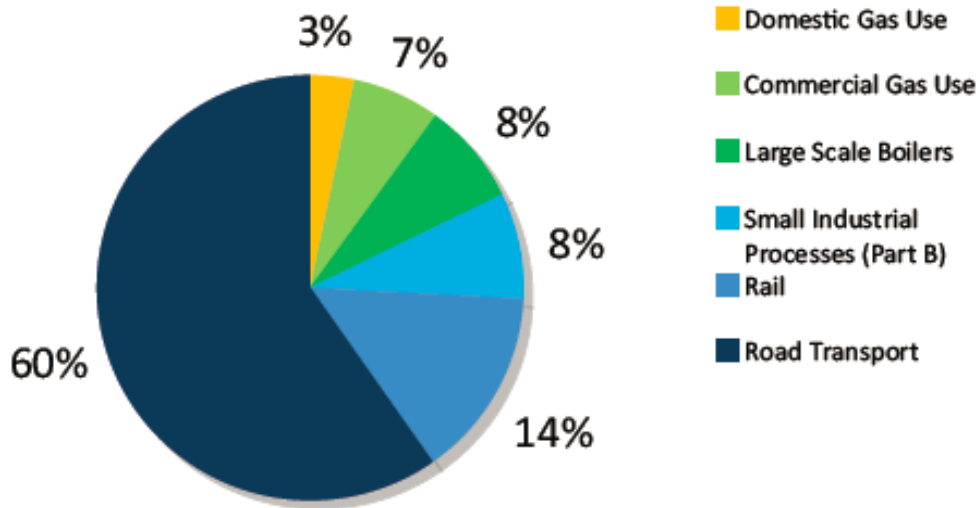


Figure 5: Sources of PM₁₀ in Camden (LEAI data) taken from: Camden's Air Quality Action Plan 2013-2015



Map 2: Modelled 2011 annual mean NO₂ concentration, taken from Camden's Air Quality Action Plan 2013-2015

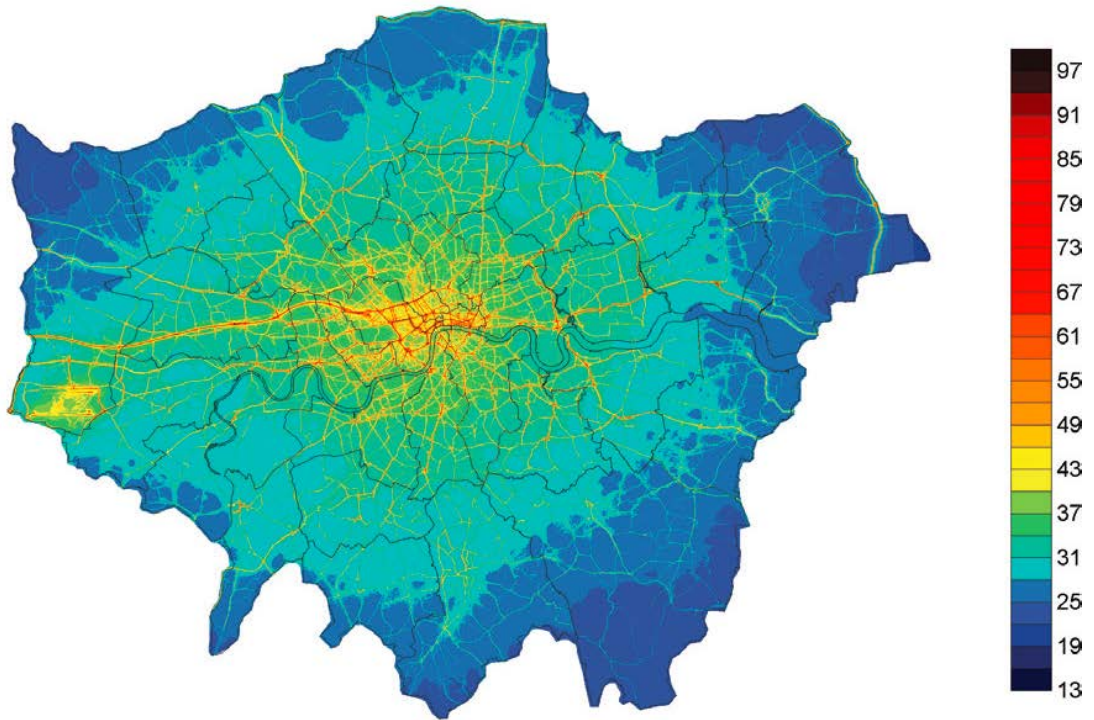
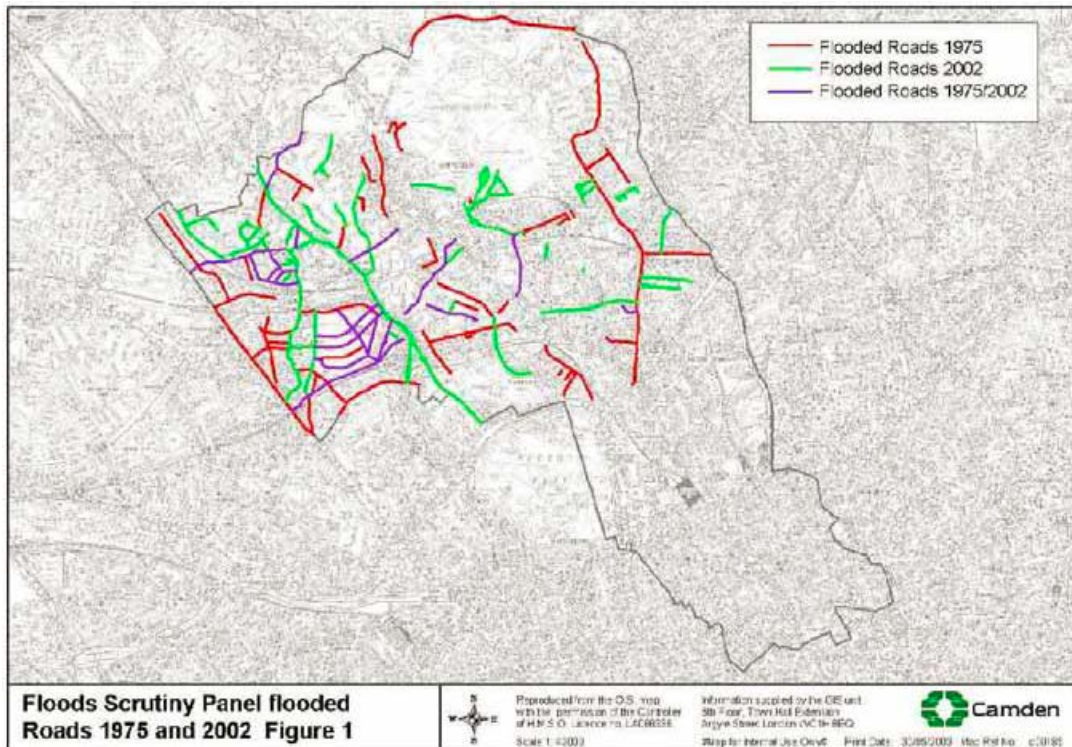


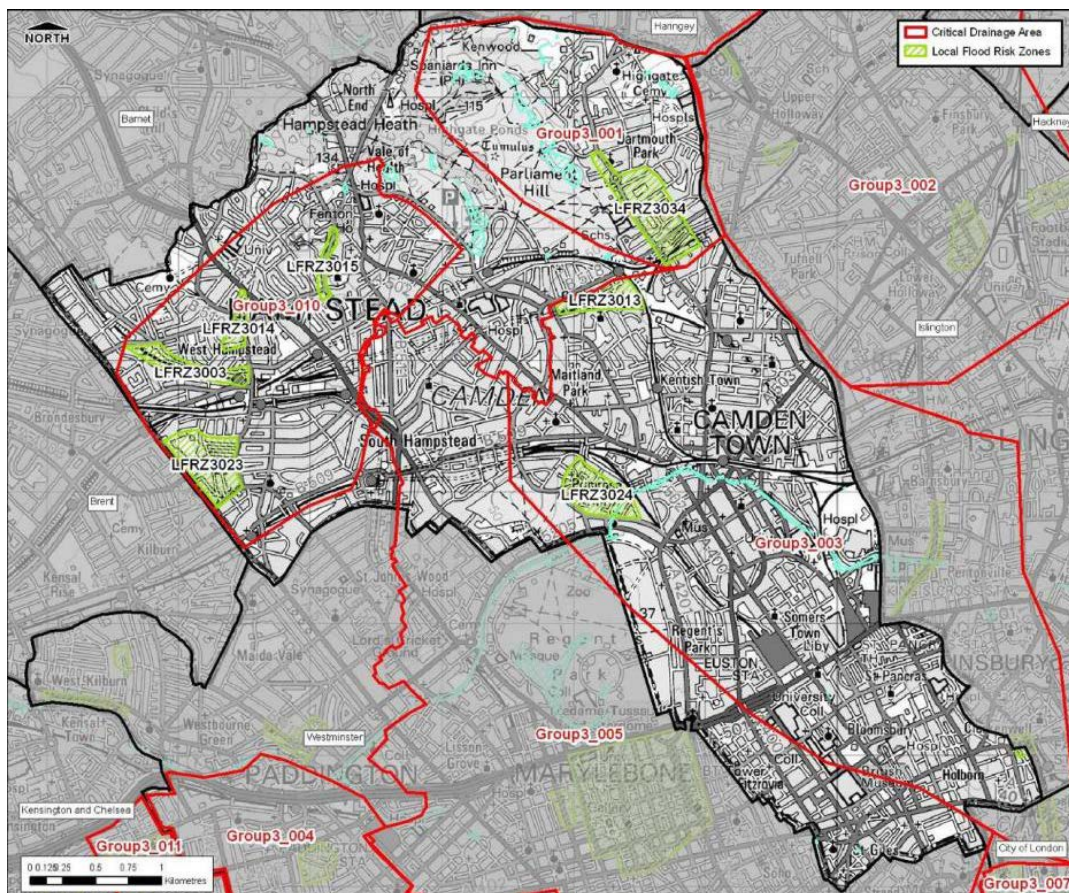
Fig 2: NO₂ annual mean concentrations for the year 2011 (met2008)

Water and flooding

Map 3: Flooded roads in 1975 and 2002



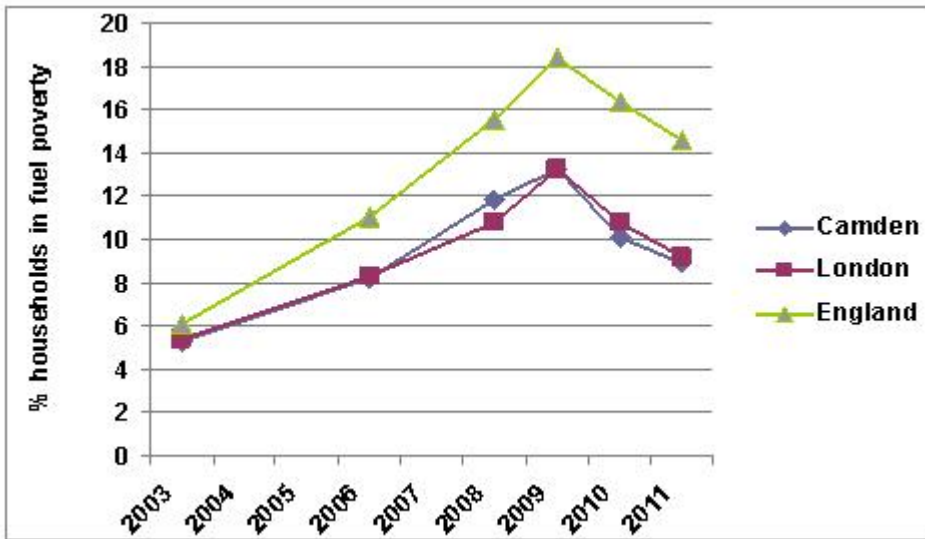
Map 4: Critical drainage areas and local flood risk zones



Camden Surface Water Management Plan, Drain London 2011

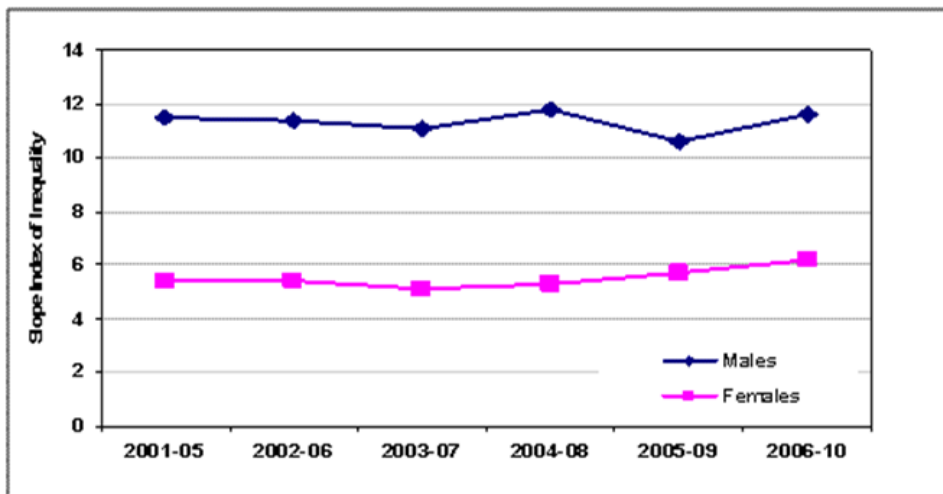
Health and community facilities

Figure 6: Households in fuel poverty in Camden, London and England, 2003-2011



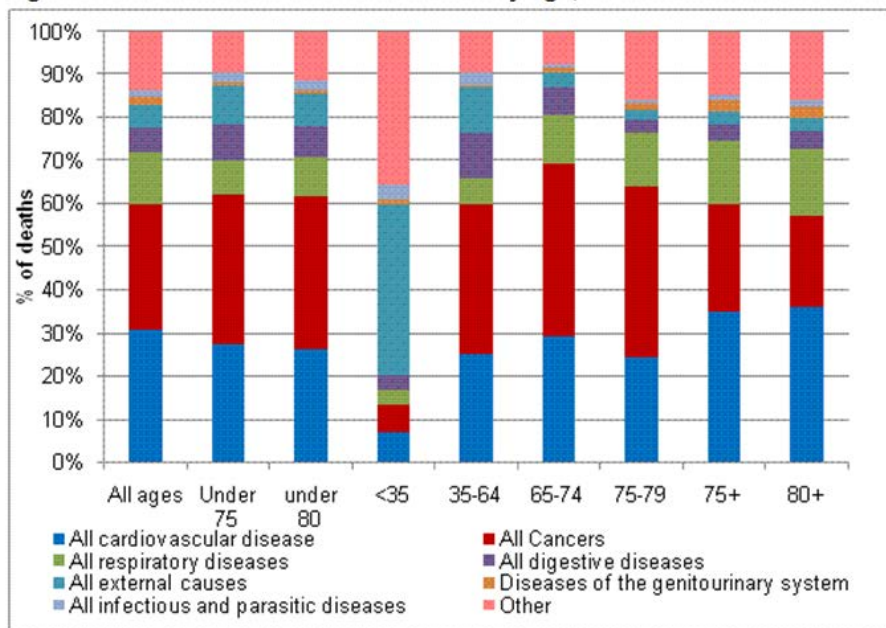
Taken from Camden's Joint Strategic Needs Assessment, Source: Centre for Sustainable energy's fuel poverty indicator and Department for Energy and Climate Change fuel poverty data.

Figure 7: Trends in life expectancy gap for males and females, Camden 2001-2010 (5 year rolling averages), taken from Camden's Joint Strategic Needs Assessment



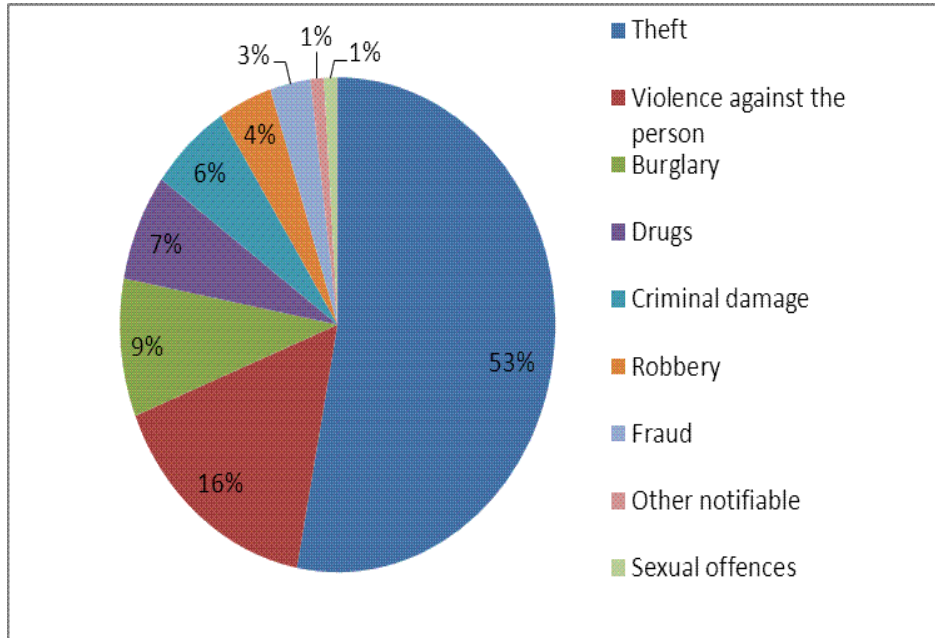
Source: Association of Public Health Observatories

Figure 8: Distribution of deaths and cause by age, Camden 2008-2010, taken from Camden's Joint Strategic Needs Assessment



Source: Office for National Statistics vital statistics, 2008-10

Figure 9: Crime recorded in Camden 2011/2012, Joint Strategic Needs Assessment



Education

Figure 10: Admission Capacity Filled* Primary Schools

School Planning Area		% in National Curriculum Year Group that are filled						
		R	1	2	3	4	5	6
% Places Filled	PA1	99	99	98	98	97	96	92
	PA2	96	98	95	94	92	94	85
	PA3	98	99	91	84	88	89	86
	PA4	95	97	97	97	96	95	88
	PA5	86	88	97	98	92	83	90
	All Primary	96	97	95	94	92	92	88

Source: January School Census 2013 (final) * % capacity full is based on the admission number from original year of entry and PA1 includes St Luke's

Map 5: Primary School Provision 2013/14

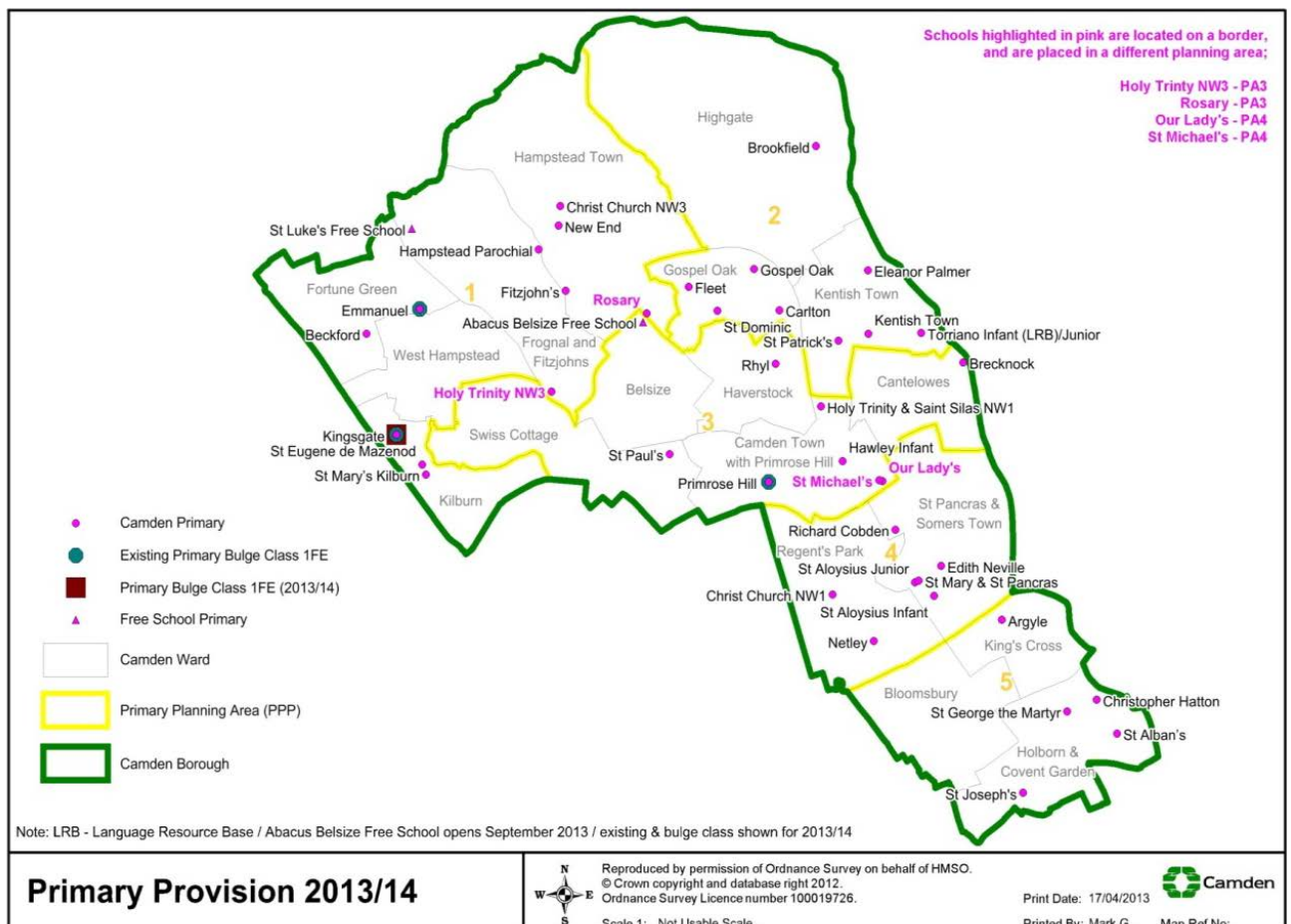


Figure 11: Actuals, Net Capacity & Surplus 2013 Provisional, Secondary Schools

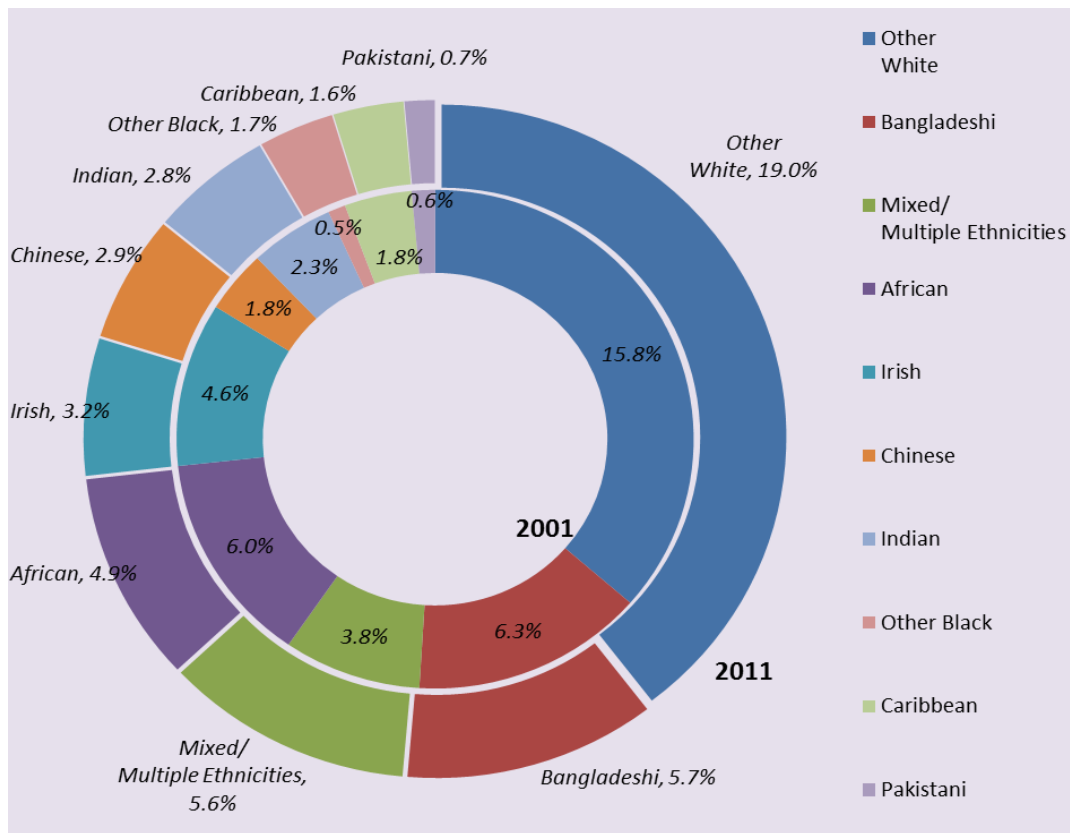
Camden Total	Numbers 2013 (provisional)			Actual Surplus %				
	*Actual Pupils NOR (May)	Net Capacity 2013	Actual Surplus Places (May)	2013 (P)	2012	2011	2010	2009
Secondary without UCL	9493	10577	1088	10.3	9.2	6.2	5.4	4.4
Secondary with UCL	9791	11477	1690	14.7				

Source: School Capacity Collection 2009-12 Final, 2013 Provisional (Net capacity figures updated for 2012/13)

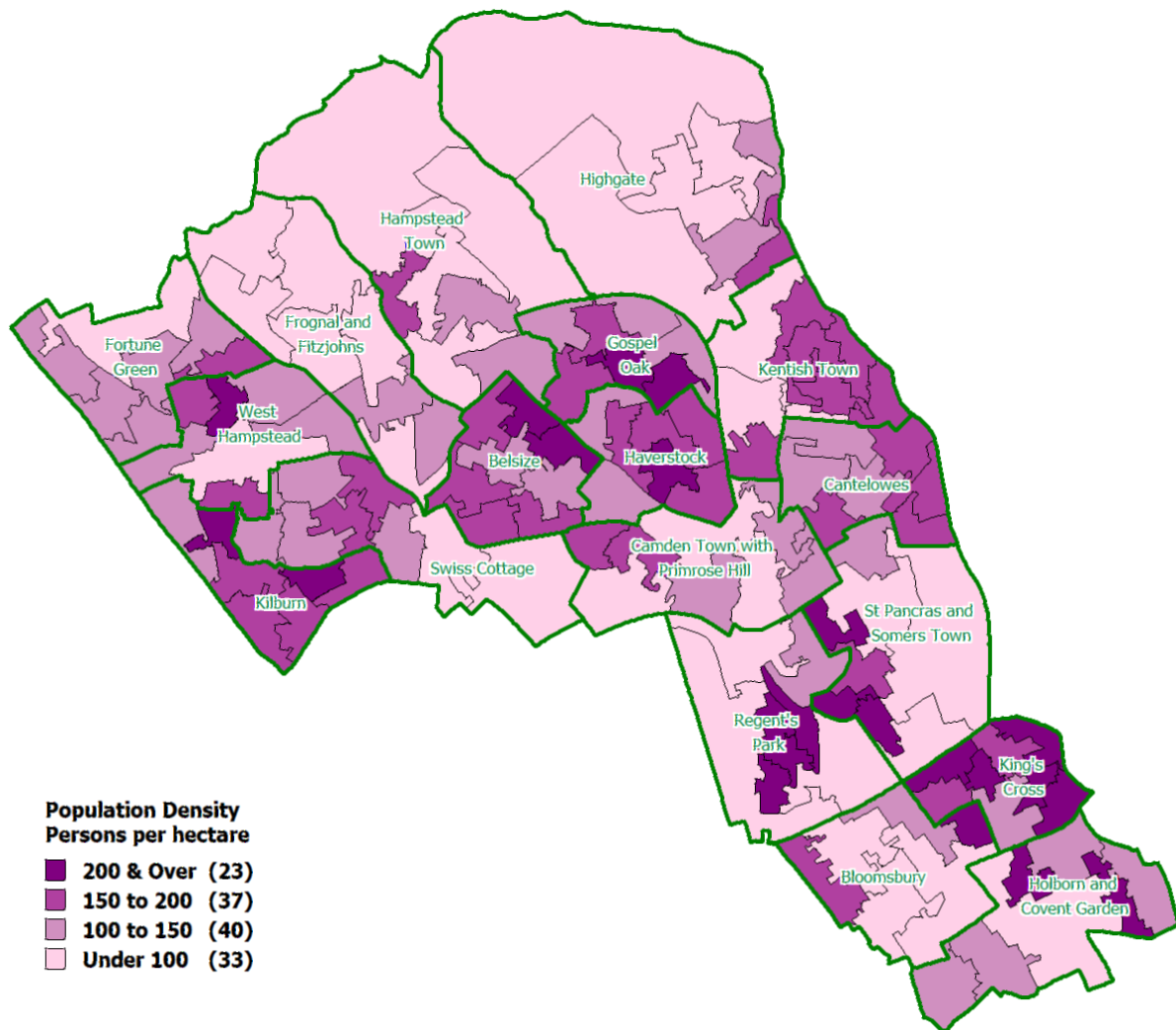
*Includes actual NOR (numbers on roll) from May 2013 Provisional School Census (all pupils) - updated 10/6/2013
 Note that the figures with UCL Academy Net Capacity included in the secondary total make it look like there is greater capacity than there actually is due to the school filling up. May SC UCL Academy not available, so used January.

Population

Figure 12: % Minority ethnic group where comparison allows, 2001 (inner) and 2011 (outer) rings, ranked on 2011



Map 6: Population density, persons per hectare



Deprivation & social exclusion

Map 7: Most deprived 30% Lower Super Output Areas in England

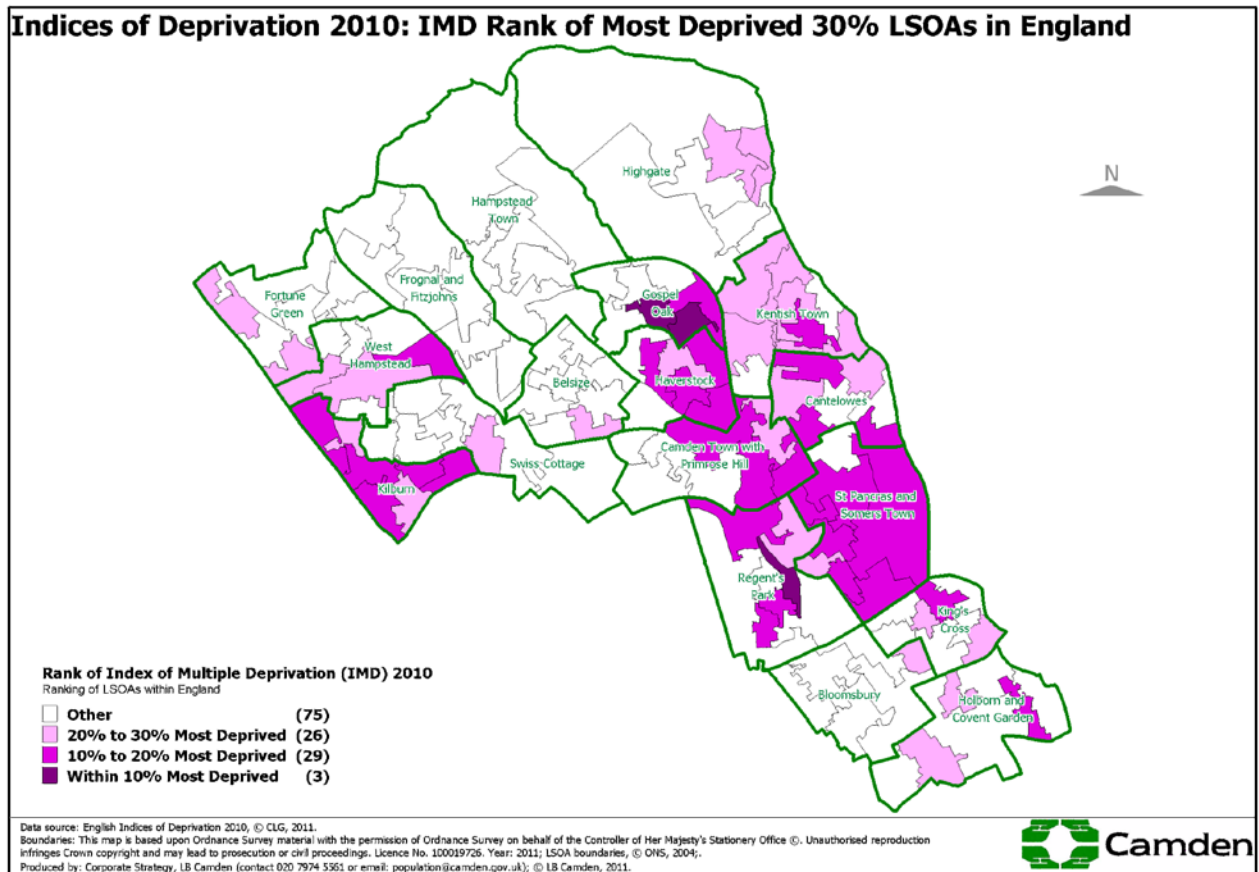
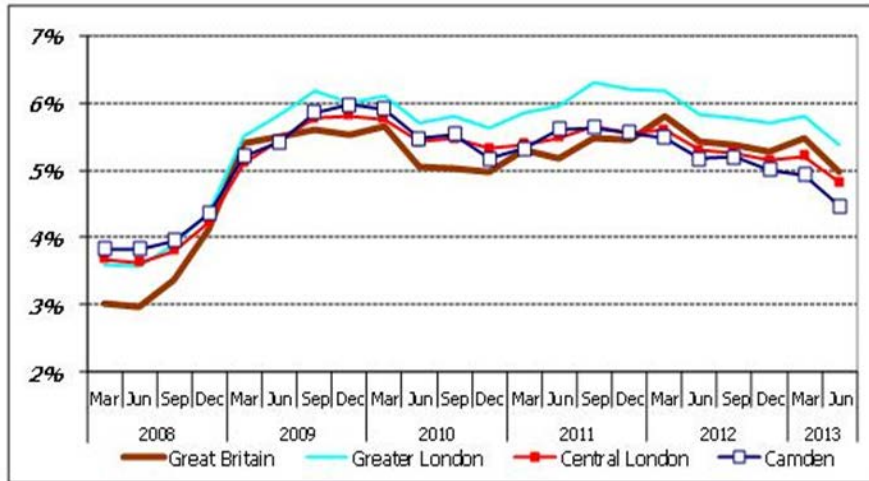


Figure 13: Claimant count unemployment rate % since the beginning of the recession, Camden and comparators, taken from Joint Strategic Needs Assessment



Source: Office for National Statistics (Jobcentre Plus administrative system) © Crown copyright, GLA estimates, © 2013.

Housing

Figure 14: Camden's Housing Trajectory 2013 & graphic below, AMR 2012/13

Indicator	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Net additional dwellings – in previous years	886	420	551	366	566																
Net additional student accommodation - completions	603	54	115	96	0																
Net additional hostel bedrooms - completions	-149	-17	23	-401	-21																
Allocated Sites						446	647	1,272	1,889	851	737	402	472	281	215	124	58	1,800	20	0	0
Local authority delivery sites (not covered above)						0	255	382	778	42	317	182	269								
Allocated student accommodation (including West Hampstead Growth Area)						1,006															
Permissions (dwellings)						205	205	205	205	205											
Permissions (student accommodation)						408	408	408	408	408											
Permissions (hostel bedrooms)						11	11	11	11	11											
Windfall Projection (small sites)												153	153	153	153	153	153	153	153	153	153
Net additional homes – in future years						1,871	1,066	1,691	2,308	1,270	737	555	655	434	268	377	211	1,953	173	153	153
Annualised London Plan Target	537	537	537	665	665	665	665	665	665	665	665	665	665	665	665	665	665	665	665	665	665
Cumulative Annualised Planning Target	537	1,074	1,611	2,148	2,813	3,478	4,143	4,808	5,473	6,138	6,803	7,468	8,133	8,798	9,463	10,128	10,793	11,458	12,123	12,788	13,453
Cumulative Completions	1,340	1,797	2,486	2,547	3,092	4,963	6,029	7,720	10,020	11,290	12,035	12,596	13,227	13,667	13,941	14,324	14,541	16,500	16,679	16,838	16,997
Monitor (cumulative completions minus the cumulative targets)	803	723	875	399	279	1,485	1,886	2,912	4,555	5,160	5,232	5,128	5,094	4,869	4,478	4,196	3,748	5,042	4,556	4,050	3,544
Managed delivery target (no of completions needed to be on track)	641	606	613	609	642	648	566	530	441	285	196	142	95	28	-31	-81	-174	-272	-1016	-1613	-3385

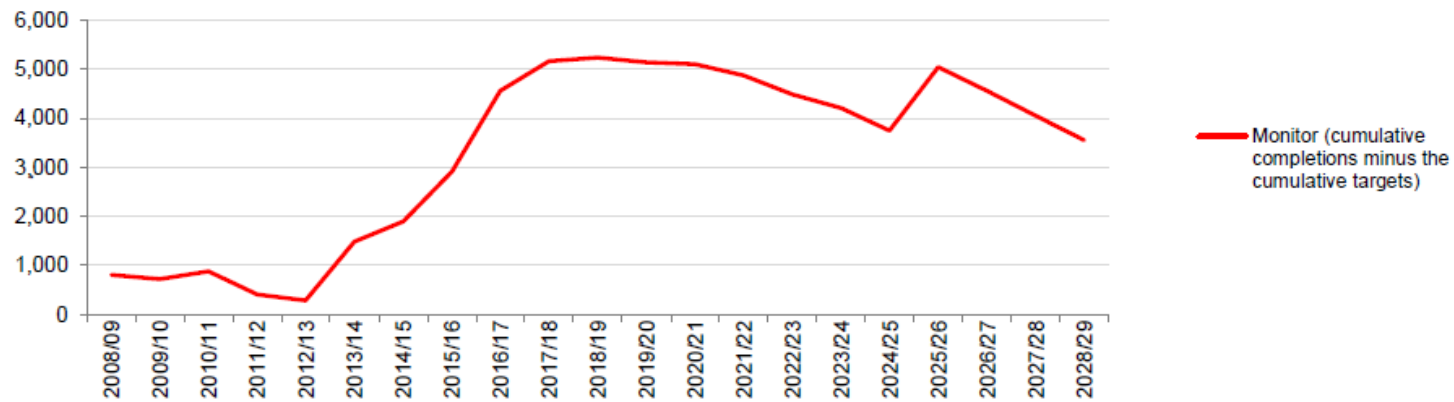
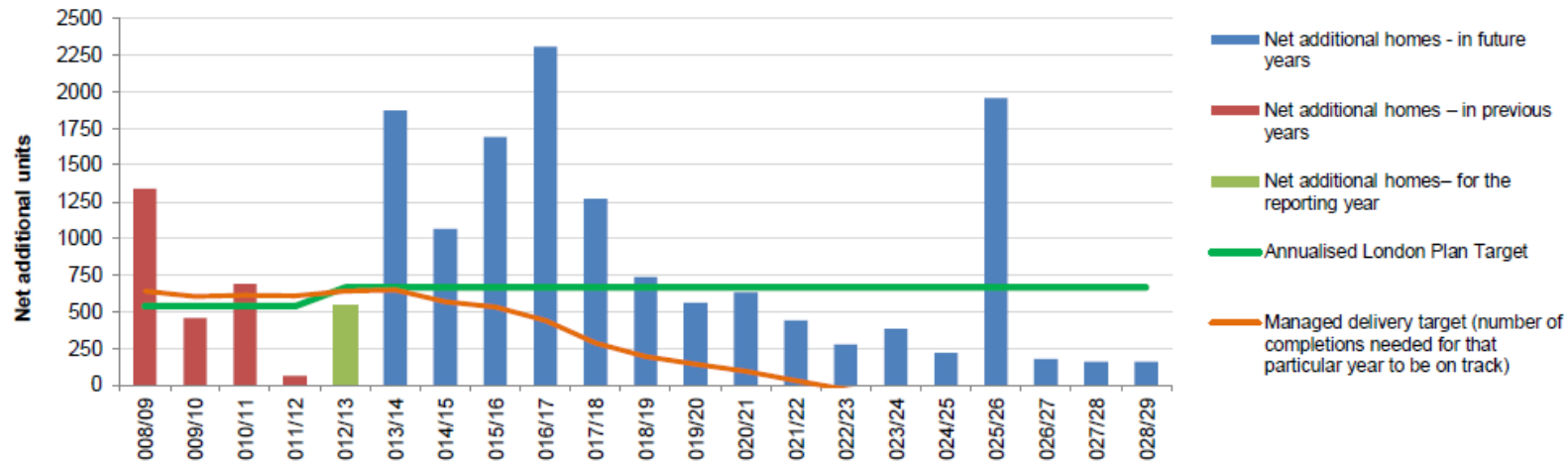
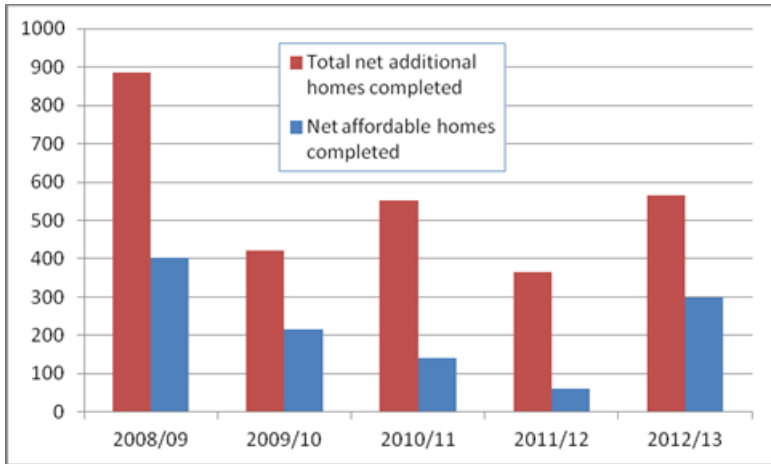


Figure 15: Affordable housing completed (2008/09 – 2012/13), AMR 2012/13



Town centres and Employment

Figure 16: Vacancy rate, all designated shopping frontages 2007 – 2013, AMR 2012/13

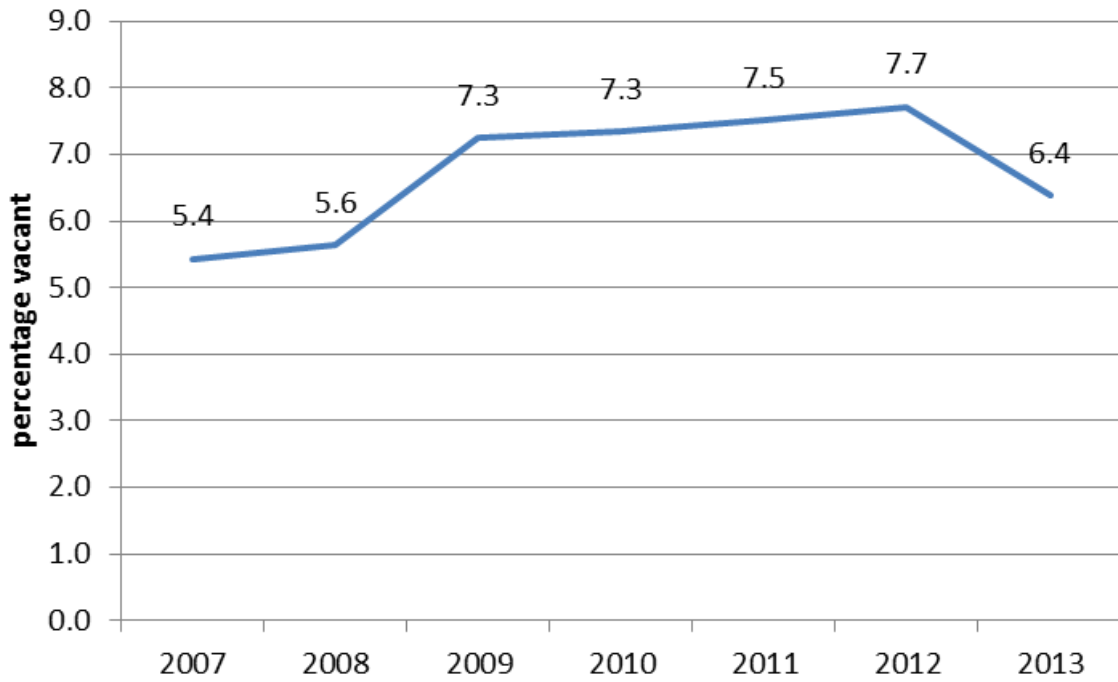


Figure 17: Retail (A1 shops), food, drink and entertainment (A3, A4, A5), all protected shopping frontages in LB Camden, 2007 to 2013, AMR 2012/13

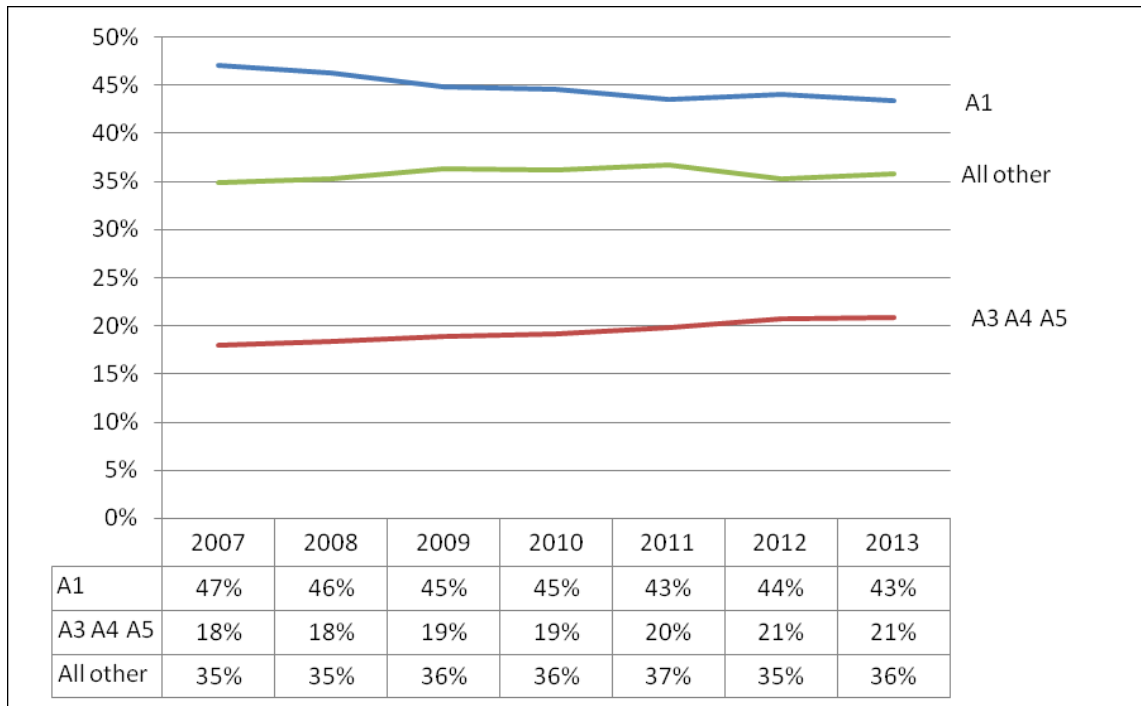


Figure 18: Change in employment floorspace (7 years), AMR 2012/13

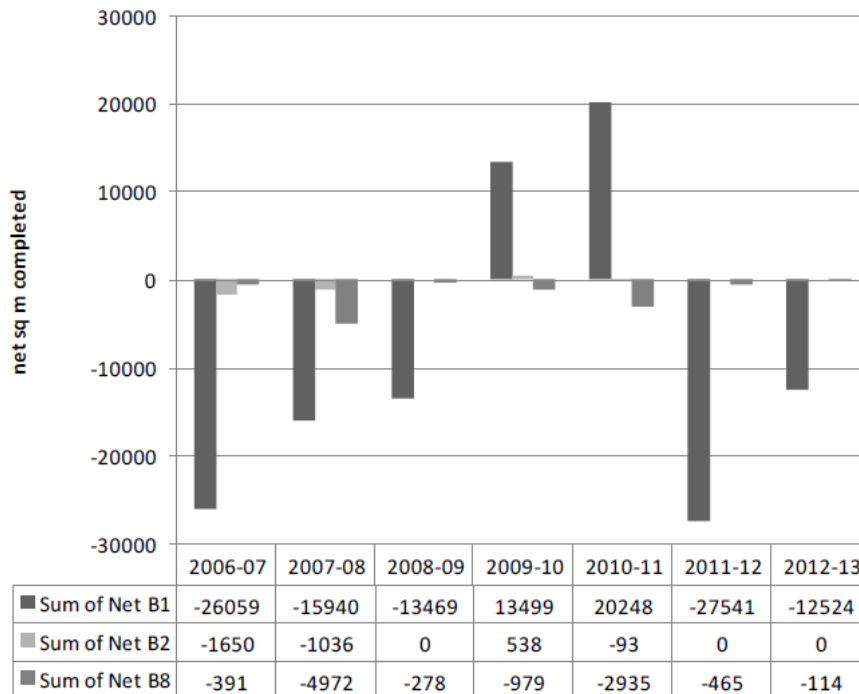
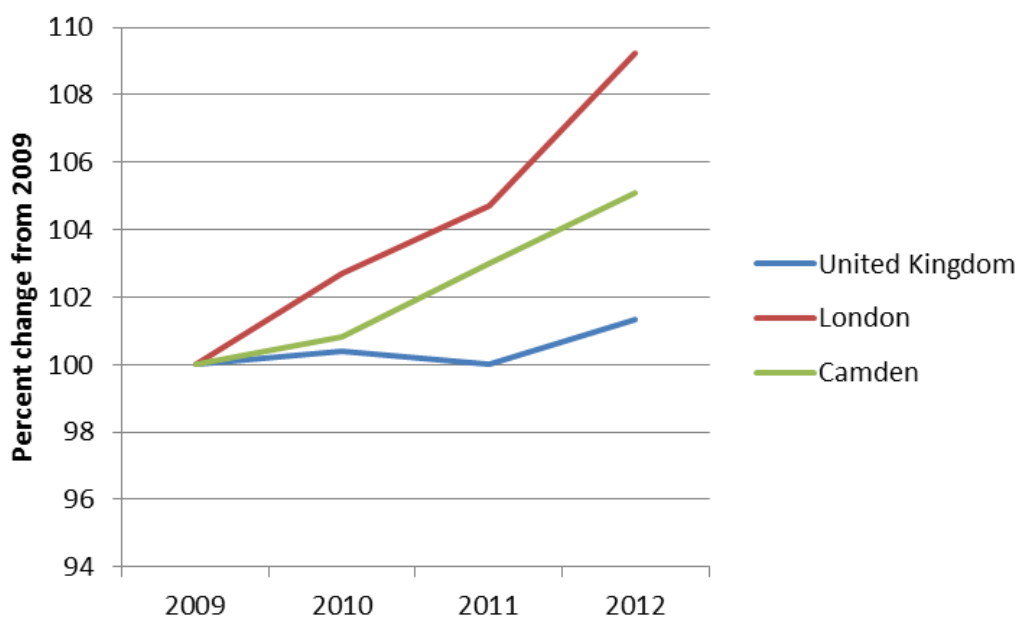


Figure 19: Change in number of businesses, Camden and comparators, AMR 2012/13



Recycling and waste management

Figure 20: LB Camden Municipal Waste Arisings, AMR 2012/13

Year	Total Municipal Waste Arisings	Camden Household Waste	Camden Non-Household Waste	Camden Household Recycling	Camden Non Household Recycling	% of household waste recycled
2001/02	134,503	83,668	36,921	12,533	-	14.46%
2002/03	135,225	83,135	36,503	13,857	-	16.07%
2003/04	132,105	78,868	34,955	16,486	-	19.17%
2004/05	133,494	63,782	48,641	19,788	-	25.21%
2005/06	134,914	55,990	58,108	19,580	305	27.14%
2006/07	135,697	54,231	57,978	21,248	2,096	28.05%
2007/08	131,426	51,753	57,010	19,607	2,902	27.12%
2008/09	126,589	50,532	53,135	20,391	2,452	28.27%
2009/10	122,606	48,516	50,649	20,875	2,511	29.75%
2010/11	121,322	51,437	41,754	24,652	2,792	32.23%
2011/12	117,582	50,688	38,481	25,124	2,793	32.97%
2012/13	110,890	40,567	35,170	21,274	2,491	30.91%

Appendix 5: Baseline information gaps

Nature of gap (indicator)	Why there is a gap	How we will fill this gap
Number of applications affecting trees protected by TPOs	This information is currently not collected through the Council's development monitoring process.	It is possible that this information could be monitored in the future through the Council's development monitoring process.
Number of applications permitted that involved the loss of trees	This information is currently not collected through the Council's development monitoring process.	It is possible that this information could be monitored in the future through the Council's development monitoring process.
Number of developments that have incorporated green roofs, landscaping or open space to improve biodiversity	This information is currently not collected through the Council's development monitoring process.	It is possible that this information could be monitored in the future through the Council's development monitoring process.
% new developments using sustainable construction	This information is currently not collected through the Council's development monitoring process	<p>It could be that some of this information could be collected from the Council's building control services. However, given that building certifications can be obtained independent of the Council, this data would still be incomplete. It could also be gathered through planning applications. Though this may prove inefficient in terms of use of officers' time, as it would likely be a matter of going through every application during its assessment to determine whether sustainable construction is included.</p> <p>It may be that this gets picked up through proposed housing standards set by the Government.</p>
Number of new developments incorporating water conservation measures e.g. SUDS	This information is currently not collected through the Council's development monitoring process.	The Council is now a lead local authority –When the SuDs Approval Body is set up there may be a way of monitoring the number of SAB applications that are

		approved in the future through this process.
Water quality		Important to note that there will be a 2 nd Thames river basin management plan out for consultation in 2014 -and this will set out the draft site specific and catchment wide actions that require implementation to enable waterbodies to reach good ecological status or potential by 2027.
Provision of health facilities by type per 1000 population	This information is currently not available.	Key reforms in health mean that the borough will have a leading role in delivering local health services, together with new responsibilities. New indicators are likely to be developed to reflect these changes.
% Developments incorporating secure by design principles	This information is currently not collected through the Council's development monitoring process.	It is possible that this information could be monitored in the future through the Council's development monitoring process.
Proportion of adults with poor literacy and numeracy skills	Awaiting information.	These will be inserted into the baseline as soon as they are made available

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.

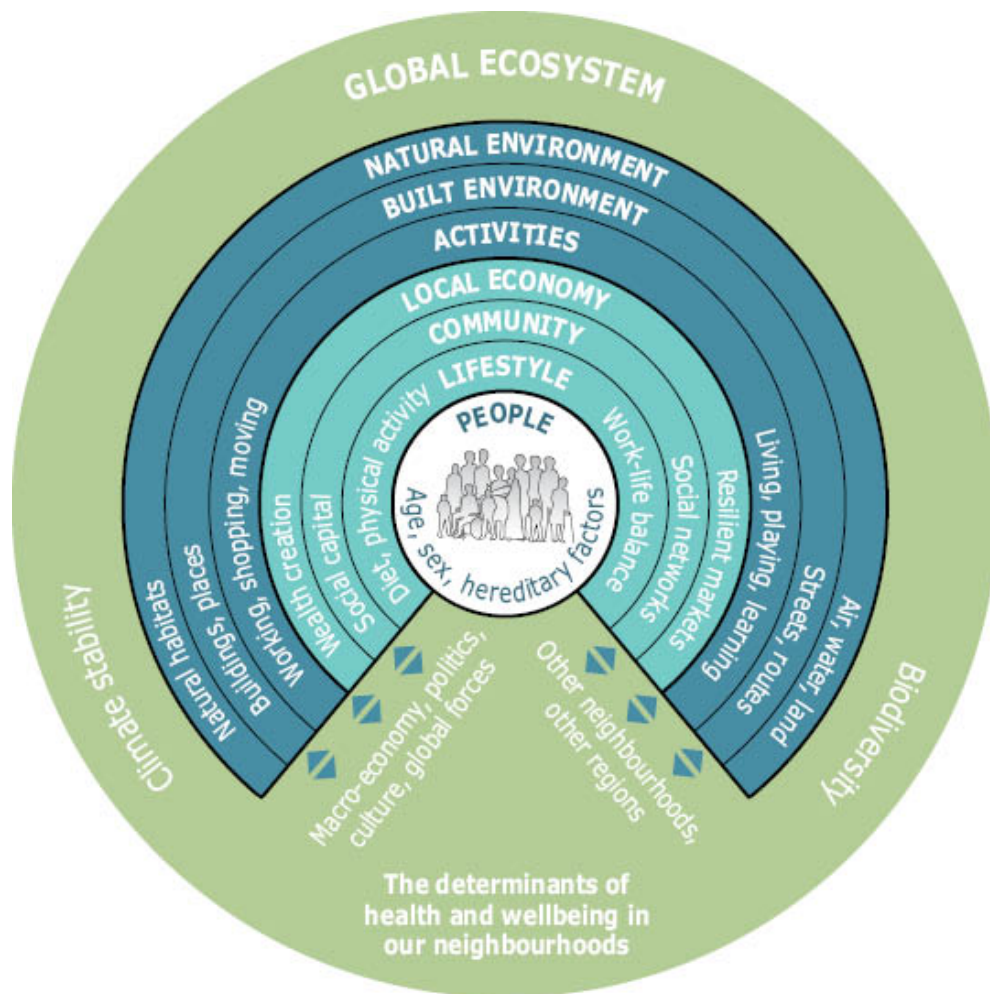
- 1.8 The Core Strategy and Development Policies Document of the LDF were adopted in 2010 and were subject to SA. The stages of SA, including the assessment of reasonable alternatives, remain relevant. The earlier SA Scoping report provides the framework for the sustainability appraisal of the Local 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.	National Planning Policy Framework 2012 Planning Practice Guidance superseded – PPSs & PPGs.
2.	The UK Sustainable Development Strategy: Securing the Future (UK Govt

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

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

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

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

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

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

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 Cantelowes 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 m² gross additional floorspace), but for smaller schemes the sliding scale applies - 10% for 10 additional homes (or 1000m² gross of additional floorspace), 20% for 20 homes/ 2000m², 35% for 35 homes/3500m² 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 9m² per person?
 2. Increase our public open space targets to 13m² 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, CO₂/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 500m² 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"> • An outline of the contents of the Local Plan is set out in Chapter 3. • The vision and objectives of the plan are outlined in Chapter 3. • 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.
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"> • 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. • 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.
c) The environmental characteristics of the areas likely to be significantly affected	<ul style="list-style-type: none"> • This is covered in Appendix 2 of the Scoping Report which identifies the key baseline information for the borough. • The baseline characteristics of the borough are also contained in chapter 4 of the SA report.
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"> • 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. • The baseline characteristics of the borough are also contained in chapter 4 of the SA report.
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"> • 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.
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"> • The appraisal findings are presented in chapters 6 – 8 of the SA.

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"> • Mitigation measures are discussed in chapters 6 and 8 of this SA.
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"> • Chapters 6 - 8 explain how understanding of options has been developed and refined over the course of the plan-making / SA process.
i) A description of measures envisaged concerning monitoring	<ul style="list-style-type: none"> • Proposed monitoring measures are summarised in chapter 8 of this SA Report.
j) a non-technical summary of the information provided under the above headings	<ul style="list-style-type: none"> • A non-technical summary is provided as a separate annex to this SA.

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

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

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 ₂ 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.

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

Issue: Affordable housing tenure	Options		
	1	2	3
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.			
Appraisal findings (likely significant effects)			
Option 1: 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>			
Option 2: 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>			
	SA Objectives		
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).

Issue: Houses in Multiple Occupation (HMOs)	Options	
	1	2
Appraisal findings (likely significant effects)		
Option 1: 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>		
Option 2: 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>		
	1 Housing	+
	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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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: Basements**Appraisal findings** (likely significant effects)

Option 1: Minor adjustments to policy without making arbitrary limits on depth or extent

Commentary paragraph

This option will ensure that basement development does not harm the amenity or structural ground or water conditions of the area, or cause damage to neighbouring properties as evidenced by the applicant to the satisfaction of the Council.

Basements will be long term to permanent in effect. Policies will apply borough wide.

Option 2: Restrict basement development of more than one storey depth and to more than 50% of the garden area

Commentary paragraph

This option would further restrict the basement development, limiting the size of a small number of basements which otherwise do not affect amenity, or structural, ground water conditions, or damage to neighbouring properties.

The amenity and biodiversity benefits in this option would come from restricting basement development under garden land, and therefore projecting trees and gardens.

Basements will be long term to permanent in effect. Policies will apply borough wide.

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	0
6 Sustainable communities	0	0
7 Urban design i	0	0
7 Historic environment ii	0	0
8 Vacant land	0	0
9 Transport	0	0
10 Amenity	0	+
11 Water	+	+
12 Biodiversity	0	+
13 Waste	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
<p>Option 1: Promote the principle of designating Local Green Space Commentary paragraph –</p>		
<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>	-	-
	+	+
	+	+
	0	0
	0	0
	0	0
	+	+
	+	+
	0	0
	0	0
	0	0
	+	+
	0	0
	+	+
	0	0
	0	0
	0	0
	0	0
	0	0
	0	0
	0	0

Amenity – if general amenity rather than devt impact then would be positive

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.

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).

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>Appraisal findings (likely significant effects)</p> <p>Option 1: Maintain existing public open space provision standards of 9m² 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>Option 2: Increase our public open space targets to 13m² 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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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

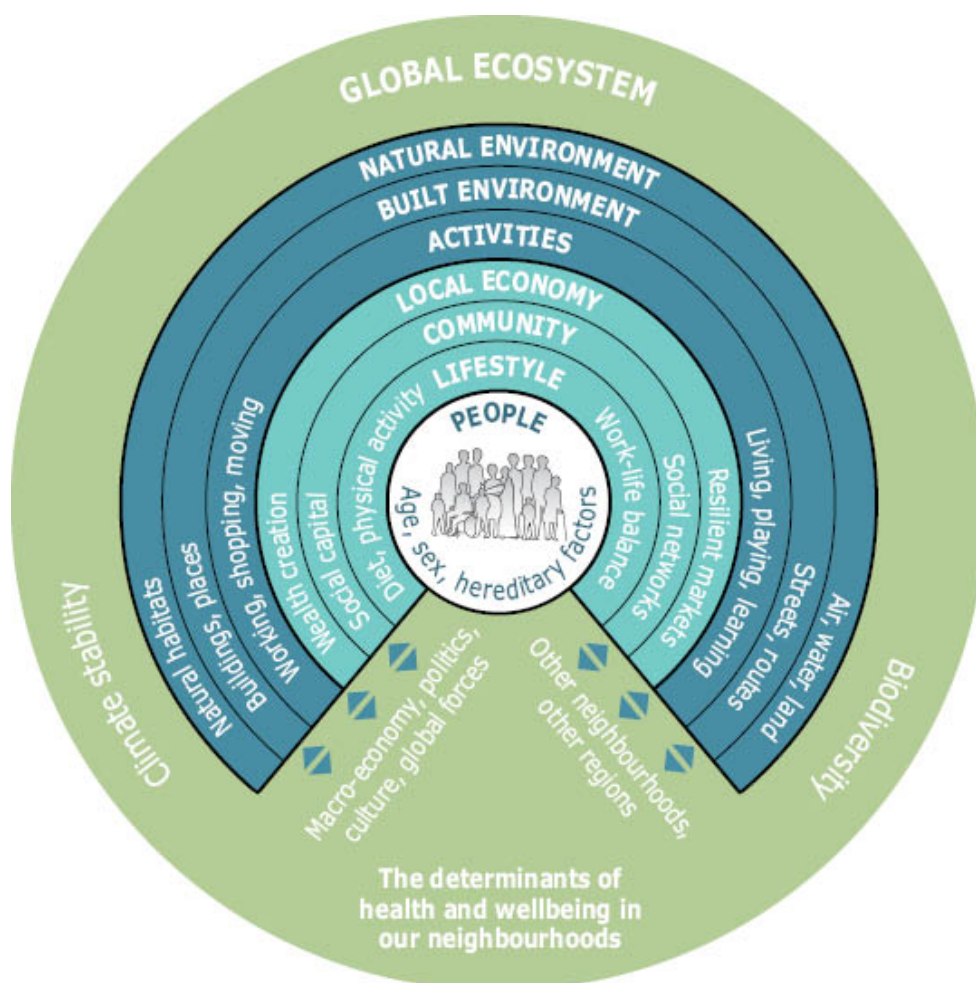
Health Impact Assessment

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).

Camden Local Plan

Sustainability Appraisal of Proposed Main Modifications

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Non-technical summary

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

This report is an addendum to the SA submitted with the Local Plan Submission Draft for examination by the Secretary of State. During the examination process a number of main modifications (changes) to the Local Plan have been proposed. This report assesses whether the main modifications to the Local Plan are likely to have significant effects on sustainability.

Each of the main modifications (suggested changes to the Local Plan) has been assessed using Sustainability Objectives and criteria that evolved from earlier scoping work. In summary this assessment found no significant negative effects against the SA Sustainability Objectives.

This annex to the Sustainability Appraisal is being published for consultation alongside the main modifications proposed to the Local Plan following the examination hearings. This document should be read alongside the main SA Report and Scoping Report.

Introduction

The 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 Local Plan it helps ensure that the planning policies achieve 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 Local Plan Submission Draft 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 Proposed Main Modifications has been produced following the close of the examination hearing sessions, which took place in October 2016. The Council has produced a proposed schedule of main modifications following these hearings which have been published alongside this document. These main modifications are likely to be required to make the plan sound and legally compliant. This report has been produced in order to consider any significant changes that may not have been appraised previously and should be read alongside the previous Sustainability Appraisal documents which 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).

Methodology

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**.

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 16 key SA objectives were developed through the SA Scoping Report, and any changes to these objectives following the SA process have been incorporated.

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

No.	Objective	Criteria
	opportunity	
6	To maximise the benefits of regeneration and development to promote sustainable communities	<ul style="list-style-type: none"> a) Will the Local Plan encourage investment that will promote social well-being and benefit the economy? b) Will the Local Plan promote access to employment opportunities for local people? c) Will the Local Plan provide for adequate education facilities, including life long learning? d) Will the Local Plan encourage housing development to meet the needs of the local people?
7	<ul style="list-style-type: none"> i) To promote high quality and sustainable urban design ii) To protect and enhance the historic environment 	<ul style="list-style-type: none"> a) Will the Local Plan provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Will the Local Plan ensure enhancement of the public realm and local distinctiveness? c) Will the Local Plan conserve and enhance conservation areas, heritage assets and their settings and other areas of intrinsic and historical value? d) Will the Local Plan 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 Local Plan encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Will the Local Plan ensure efficient use of land through maximising densities where appropriate?
9	To reduce reliance on private transport modes and enhance permeability for non-motorised travellers.	<ul style="list-style-type: none"> a) Will the Local Plan encourage development at locations that enable walking, cycling and/or the use of public transport? b) Will the Local Plan encourage the provision of infrastructure for walking, cycling and/or the provision of public transport? c) Will the Local Plan encourage access for all to public transport? d) Will the Local Plan encourage an increase in car free and car capped housing? e) Will the Local Plan encourage the transportation of freight by means other than road?
10	To improve amenity by minimising the impacts associated	<ul style="list-style-type: none"> a) Will the Local Plan ensure that the amenity of neighbours is not unduly impacted? b) Will the Local Plan ensure that development and operations will not affect noise sensitive uses?

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

In order to attribute likely impacts against these objectives a matrix was developed that included the objectives and columns for carrying out the appraisal. Within the matrix, the effects on the issues are depicted by symbols (below), and a commentary is provided to state the reasoning behind this appraisal.

Significance of effect		Description of effect
+ +	Major positive	Likely to benefit the whole of Camden 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
+	Minor positive	The extent of predicted beneficial effects is likely to be limited to small areas within Camden 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.
0	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 Camden, 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 Camden 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.

FINDINGS

Main findings of appraisal work.

Heritage

- A number of changes have been proposed to policies in the Local Plan to recognise the significance of heritage assets (growth and spatial strategy, protecting amenity, design and heritage). These changes were recommended by Historic England. While the Plan (as drafted) recognises the importance of conservation and the historic environment, the modifications provide awareness and greater attention to the significance of heritage assets in the borough. These changes cumulatively are considered to have minor positive impacts against SA objective 7ii for the protection and enhancement of the historic environment.

Housing

- The proposed modifications to Policy H2 and associated paragraphs have a neutral impact on sustainability objectives overall as they provide greater emphasis on the requirement for self-contained housing in some locations and circumstances, but greater flexibility in some locations and circumstances over the balance between the delivery of self-contained housing on-site and development of other uses.
- The proposed modification to Policy H4 in terms of the reduction of the overall affordable housing target is considered to have a neutral impact on sustainability objective 1(b) as it reflects an updated estimate of the amount and type of homes the Plan will deliver rather than any modification to the Plan's approach or the mechanism and targets set out in Policy H4 for negotiation of affordable housing from individual developments.
- Modifications are proposed to Policy H4 criteria (g), Policy H6, Policy H11 and associated paragraphs removing an intention to seek provision for traveller accommodation on development sites of 0.5 ha or more. These modifications are likely to have a minor negative impact in terms of social exclusion objective 4(a) as removal of this requirement could make delivery of housing for travellers more difficult to achieve. This negative impact is mitigated through a minor positive impact on housing objective 1(a) as these modifications are likely to enable a greater number of homes to be delivered on these sites. Any negative impact may also be mitigated by the modifications to Policy H11 and associated paragraphs that remove the minimum pitch requirement in favour of the maximum requirement, although the impact of this modification is uncertain prior to the proposed review of the Camden Site Allocations 2013.
- The proposed modifications to policy H6 and associated paragraphs relating to adaptable homes are considered to have a neutral impact on sustainability objectives overall. The removal of requirements to meet optional technical standards as far as possible is likely to have a minor negative impact on social exclusion objective 4(a) as there will be less potential to achieve specific accessibility features in homes created from the conversion of buildings. However, this impact will be mitigated by the additional policy H6 criterion (a) and supporting

paragraphs that encourage the consideration of accessibility and changing household needs in the design of all housing, and will therefore have a minor positive impact on housing objective 1(e).

Community, health and wellbeing

- The proposed modifications to Policy C2 Community facilities should encourage the retention of community facilities in Camden and ensure that development considers the effect a community facility has on a wider than local population. These alterations would likely have minor positive effects against SA objectives 3 and 4 for ensuring access to community facilities and tackling social exclusion.
- Proposed changes to policy C3, Cultural and leisure facilities, may have minor positive impacts on the provision of cultural facilities. The modification is likely to have a greater minor positive effect with regards to SA objective 4 in tackling social exclusion having regard to health and wellbeing effects.

Economy and jobs

- SA objective 5 looks to encourage and accommodate sustainable economic growth and employment opportunity, specifically encouraging the retention and growth of locally based industries. The additional text proposed in this chapter further reinforces the importance of the Kentish Town Industry Area as a centre for employment based uses and requires redevelopment proposals (employment uses) to retain existing businesses that wish to remain and highlight the need for the businesses to be located in sustainable locations. These modifications will likely have minor positive effects on the sustainability impact of the Plan.
- Modifications in this chapter provide further clarification on what is meant by affordable premises, providing greater certainty of what should be delivered. The provision of affordable workspace is important in the borough to help support existing established sectors and support new investment and opportunities for employment. Overall, the modifications are therefore considered to have neutral effects although some minor positive effects are identified.

Protecting amenity

- The modifications proposed to Policy A2 will likely have positive effects on the sustainability impact of the Plan through ensuring greater protection of open space and in particular undesignated open space on housing estates.
- The additional consideration in Policy A2 for existing sports and recreation sites to be able to provide alternative provision, where there is a recognised need, will likely have minor positive effects with regard to SA objectives 2 and 3. These objectives are concerned with healthy living and access to leisure facilities.

Sustainability and climate change

- Proposed modification to Policy CC2 and associated paragraphs relating to residential floorspace and BREEAM assessments, may make it harder to meet our overall carbon reduction targets and as such have minor negative impacts against SA objective 14 and 15. This will be mitigated in part by the proposed modifications below.
- Following consultation with the Environment Agency a modification is proposed to paragraph 8.69 requiring Flood Risk Assessments to factor in updated EA climate change allowances. More robust flood risk assessments are likely to have a minor positive effect.
- The addition to paragraph 8.79 which requires an Air Quality Assessment (AQA) for connections to existing Decentralised Energy networks (where the increase in capacity is not covered by an existing AQA) will likely have positive impacts with regard to Sustainability Objective 14 in reducing the discharge of particulate matter.

Town centres and shops

- The proposed modifications to Policy TC2 and associated paragraphs relating to the Council's expectations for the mix of uses within the frontages is considered to have minor positive impacts in relation to SA objective 3 and retaining key services in proximity to good public transport access.
- The proposed modification in relation to betting shops, pawn brokers and pay day loan shops will mean the Plan has less ability to control these uses which could cause harm to the vitality and viability of town centres. However this risk has been mitigated by an undertaking to monitor these uses in case there is a need to introduce controls in future.
- The proposed modifications in relation to hot food take aways near to secondary schools will reduce the Council's ability to limit this type of development which could have a minor negative impact on childhood obesity. However, policy TC4 criterion f retains the ability for the Council to consider the health impact of town centre development.

Transport

- SA Objective 7 is concerned with reducing reliance on private transport modes. The requirement for development which increases pressure on existing bus services to provide contributions towards improvements will likely have positive effects in encouraging more people to use this mode of transport ahead of more private modes.

CONCLUSION

The proposed Main Modifications do not significantly affect the overall findings of the Submission version of the Sustainability Appraisal in terms of delivering positive sustainability outcomes when set against the relative Sustainability Objective criteria. If anything they will assist in providing greater clarity.

In general the proposed 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 the proposed modifications will have negative impacts, these are either compensated for by positive impacts against other sustainability criteria or mitigation measures that have been set out within the description of the implications.

Appendix 1: Summary of sustainability implications

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
Introduction			
MM01	Para 1.4	“Camden Sites Allocation – this identifies known development sites in Camden’s main growth area and other locations across the borough and sets out the Council’s expectations for them. It was adopted by the Council in 2013 <u>and will be fully reviewed following adoption of the Local Plan.</u> ”	Neutral. The modification will have no significant effect on the sustainability impact of the Plan.
Growth and spatial strategy			
MM02	Para 2.26	Kings Cross (Para 2.26 bullet 7) “Protect and enhance features <u>and assets</u> of historic and conservation importance;”	Minor positive. Added text provides greater emphasis on the significance of heritage assets.
MM03	Para 2.29	Tottenham Court Road (para 2.29 bullet point 4) Development of the highest quality as befits this historic area in the heart of London, which preserves local amenity and seeks to enhance and <u>conserve</u> preserve the <u>significance of heritage assets such as the</u> character and appearance of conservation areas;	Minor positive. Added text provides greater emphasis on the significance of heritage assets.
MM04	Para 2.31	Holborn (para 2.31 bullet point 11) High quality, sustainable design that’s respects its surroundings and <u>conserves</u> preserves and enhances the area’s <u>heritage assets and wider</u> historic environment; and	Minor positive. Added text provides greater emphasis on the significance of heritage assets.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
Meeting housing needs			
MM05	New para after 3.5	<p>New paragraph after para 3.5:</p> <ul style="list-style-type: none"> • <u>“3.5A <i>Self-contained houses and flats</i> are defined as homes where all the rooms, including the kitchen, bathroom and toilet, are behind a door that only one household can use (2011 Census Glossary of Terms). In most cases these homes fall in Use Class C3, however the Council will also regard the following as self-contained homes when applying Local Plan policies and monitoring housing delivery:</u> • <u>self-contained homes provided in conjunction with another use, notably live/ work units (homes with a dedicated work area), which are usually considered to be <i>sui generis</i> (in a class of their own); and</u> • <u>small houses in multiple occupation (Use Class C4), which can change to Use Class C3 without a planning application under the freedom provided in legislation. Where the freedom to change to Use Class C3 has been removed (e.g. by a planning condition), the Council will regard small houses in multiple occupation as non self-contained housing.”</u> 	Neutral. The modification does not substantially change the Plan’s approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM06	Paras 3.8 – 3.10	<p>“3.8 The Council produces an Authority Monitoring Report (AMR) each year which separately monitors the overall delivery of additional homes and different types of homes each year (self-contained homes, student housing, other non self-contained homes and long-term vacant homes returned to use). The AMR also contains a housing trajectory which shows how we will continue to deliver self-contained homes and non-self-contained homes and measures Camden’s anticipated performance against targets. <u>The Council has produced a new housing trajectory to show how the Plan will meet the full objectively assessed housing need, and this is included in the Local Plan as Appendix 4. In accordance with the NPPF, the trajectory adds a 5% buffer to housing targets during the first five years, which is moved forward from later years. The trajectory</u></p>	Neutral. The modifications reflect an updated estimate of the amount and type of homes the Plan will deliver and the phasing of the targets used to monitor delivery. The modifications do not substantially change the Plan’s approach and therefore will have no significant effect on the sustainability impact of the Plan.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p><u>therefore adopts an annual target of 1,176 additional homes for the period 2016/17 to 2020/21, and a annual target of 1,092 for the period 2021/22 to 2030/31.</u></p> <p>3.9 The 2014 AMR housing trajectory indicates that there are sufficient identified sites in place to exceed our housing targets in the early years of throughout the Plan period, but not in the later years. Deliverable sites are in place to provide more than 6,500 7,100 homes from 2015/16 to 2019/20 2016/17 to 2020/21, approximately 1,420 additional homes per year, comfortably exceeding Camden's overall housing the target (including 5% buffer) of 4,420 1,176 per year (deliverable sites are sites that are suitably located, viable and available to develop now, and that have a realistic prospect of delivery within five years). Over the first 10 years of the Plan period, the trajectory indicates that developable sites have been identified to deliver an average of around 900 1,150 additional homes per year, and over the entire plan period identified sites should deliver just under 800 1,140 additional homes per year (developable sites that are suitably located and have a reasonable prospect of being viable and available to develop at the time envisaged). We are working to reassess the potential of sites across the borough to ensure that we exceed the housing target right through the Plan period.</p> <p>3.10 <u>We will update the housing trajectory regularly to take into account new sources of supply and maintain a five-year supply of deliverable sites together with a 5% buffer, and will publish the updated trajectory in future Authority Monitoring Reports. anticipate that the shortfall later in the Plan period will be met by higher density development and intensification of the existing built environment, and delivery of additional housing from sites identified in the London Strategic Land Availability Assessment (SHLAA)</u></p>	

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>2013, town centres, and Growth Areas such as Kentish Town Regis Road and Euston, together with additional student housing on sites identified in our development plan documents. These additional sources of supply will be included in future housing trajectories."</p>	
MM07	Para 3.16	<p>"The 2011 Census indicated that Camden has over 220,000 usual residents. Of these, almost 8,000 live in communal establishments, and just under 5,400 live as separate households in shared dwellings, and 40,000 live in multi-adult households such as groups of friends and flat shares. This leaves three quarters <u>Over 90% of Camden's usual residents who live in self-contained homes as part of a household of related people or as single person households (self-contained houses and flats are defined in paragraph 3.5A of the Local Plan). Usual residents of self-contained homes include 40,000 people living in multi-adult households such as groups of friends and flat-shares (18% of all usual residents). In many cases these residents are not related to the other occupiers of their home, so although they currently live in self-contained homes they could potentially live in non self-contained housing in the future.</u>"</p>	<p>Neutral. The modifications seek to provide clarity and do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.</p>
MM08	Policy H2	<p>To support the aims of Policy H1, The Council will seek to exceed the target for self-contained homes by expecting where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of to provide a mix of uses including the maximum appropriate provision of self-contained housing.</p> <ul style="list-style-type: none"> • In all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development. • We will particularly expect sites in In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road to be developed for a mix of uses including self-contained housing. In these locations, where development involves additional floorspace of more than 200 sqm (GIA), we will require up to 50% of all additional floorspace to be self-contained housing. 	<p>Neutral. The modifications provide greater emphasis on the requirement for self-contained housing in some locations and circumstances, but greater flexibility in some circumstances over the balance between the delivery of self-contained housing on-site and development of other uses.</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM08 (cont)		<p><u>subject to the following considerations.</u></p> <p><u>In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:</u></p> <ul style="list-style-type: none"> <u>a. the character of the development, the site and the area;</u> <u>b. site size, and any constraints on developing the site for a mix of uses;</u> <u>c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;</u> <u>d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and</u> <u>e. whether the development is publicly funded or serves a public purpose.</u> <p><u>Where housing is required as part of a mix of uses, we</u> We will require self-contained housing to be provided on site, particularly where 1,000sq m (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing housing in association with the development is appropriate but on-site housing is not practical or housing would more <u>appropriately be provided off-site,</u> we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.</p> <p>In considering whether to seek a mix of uses including housing, whether housing should be provided on site, and the most appropriate mix of uses, and the scale and nature of any provision of housing and other uses, the Council will take into account <u>criteria (a) to (e) and the following additional criteria:</u></p> <ul style="list-style-type: none"> a. the character of the development, the site and the area; b. site size, and any constraints on developing the site for a mix of uses; c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area; <u>df. the need to add to community safety by providing an active street frontage and natural surveillance;</u> 	

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM08 (cont)		<p>e. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;</p> <p>fg. the extent of any additional floorspace needed for an existing user;</p> <p>g. whether the development is publicly funded or serves a public purpose;</p> <p>h. the impact of a mix of uses on the efficiency and overall quantum of development;</p> <p>i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and</p> <p>j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.</p> <p>In the Central London Area and the town centres listed in this policy, where provision of self-contained housing is appropriate <u>required</u> but the development's provision of housing falls significantly short of the Council's 50% target due to financial viability, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution. The deferred contribution will be based on the initial shortfall and an updated assessment of viability when costs and receipts are known as far as possible.</p> <p><u>Where housing is required as part of a mix of uses, we</u> We will require self-contained housing to be provided on site, particularly where 1,000sq m (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing housing in association with the development is appropriate but on-site housing is not practical <u>or would more appropriately be provided off-site</u>, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.</p>	
MM09	Para 3.43 – 3.44, and	3.43 <u>Policy H1 indicates that where sites are underused or vacant, we will expect the maximum reasonable provision of housing that is</u>	Neutral. The modifications provide greater emphasis on the requirement for self-

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM09 (cont)	3.45	<p><u>compatible with any other uses needed on the site.</u> Where it is not appropriate to develop a site entirely for housing, securing housing as part of a mixed-use scheme is another way of meeting some of our housing needs whilst also meeting other needs in the area, such as providing jobs, services and facilities... [remainder of paragraph 3.43 unchanged]</p> <p>3.44 Much of the borough already has a well-established mixed-use character. To support this mixed-use character and the aims of <u>Policy H1</u> and extend this, the Council will expect <u>encourage</u> non-residential development throughout the borough to provide a mix of uses including the maximum appropriate contribution to self-contained housing.</p> <p>3.45 <u>The Council has established detailed requirements for non-residential development in Camden's Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, as these</u> are the parts of the borough which have the best access to public transport, the best potential for a mix of uses, and the best prospect for the development of housing above active street frontages. Additional housing in these locations will help provide activity and surveillance when businesses are closed, and support shops, services and local facilities. Therefore, the Council will particularly expect <u>require</u> development schemes in Central London and our <u>these larger</u> town centres to provide a mix of uses <u>subject to the considerations set out in Policy H2</u>, and will seek to negotiate up to half of all additional floorspace as <u>self-contained</u> housing (in Use Class C3), such that additional floorspace in residential use matches all the additional floorspace in non-residential uses.</p> <p>3.45A For the Central London Area and the specified town centres,</p>	<p>contained housing in some locations and circumstances, but greater flexibility in some circumstances over the balance between the delivery of self-contained housing on-site and development of other uses.</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p><u>Policy H2 provides distinct considerations and criteria used to determine whether a development is required to provide housing as part of a mix of uses, the type of housing required, whether the housing should be provided on site or off site, and achieving an appropriate mix of housing and other uses. The following paragraphs explain these in turn. Further details of the operation of Policy H2 are also set out in supplementary planning document Camden Planning Guidance 2: Housing.</u></p>	
MM10	Para 3.46	<p><u>Whether housing is required</u></p> <p><u>3.46 Proposals for additional non-residential floorspace in the Central London Area and specified town centres will be required to provide housing subject to assessment against criteria (a) to (e) in Policy H2. The Council has set a threshold indicating that the requirement applies to developments adding more than 200 sqm (GIA or gross internal area) on</u> On <u>the basis of the floorspace and ancillary space required to create a single self- contained home and a single commercial unit within a mixed-use development, the Council considers that a development adding more than 200 sqm (gross) of floorspace is sufficient to provide a mix of uses, including a contribution to the supply of housing. Housing provided as part of a mixed use scheme should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.</u> [final sentence moved to para 3.48A]</p> <p><u>3.46A Proposals are not required to provide housing if:</u></p> <ul style="list-style-type: none"> • <u>the additional floorspace is 200 sq m (GIA) or less;</u> • <u>the development is unable to create an acceptable level of</u> 	Neutral. The modifications provide greater emphasis on the requirement for self-contained housing in some locations and circumstances, but greater flexibility in some circumstances over the balance between the delivery of self-contained housing on-site and development of other uses.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM10 (cont)		<p><u>residential amenity e.g. inadequate daylight and sunlight, or other activities nearby would cause unacceptable harm to residential amenity e.g. levels of noise and vibration;</u></p> <ul style="list-style-type: none"> • <u>the development involves an extension to an existing building (especially a listed building or a building that makes a positive contribution to a conservation area) that cannot accommodate new features necessary to support housing, such as entrances, windows, staircases and lifts;</u> • <u>the development is in the designated Hatton Garden area, where the Council's priority is to secure and protect a stock of premises for the jewellery sector and support the nationally important cluster of jewellery manufacture and trading that gives the area its special character;</u> • <u>the development involves a specialised use, such as a hospital or a research facility, which has operational requirements that prevent the inclusion of housing (e.g. 24 hour activity or a controlled environment); or</u> • <u>the development is publicly funded or serves a public purpose (such as providing transport infrastructure, land required for transport, or a dedicated facility for an educational, medical or research institution), and the nature of the funding or facility prevents the inclusion of housing.</u> <p>[this point moved from para 3.62]</p>	
MM11	Para 3.48	<p><u>The type of housing required</u></p> <p>3.48 Where Policy H2 does not apply <u>applies</u> to development, the Council will generally seek self-contained housing (in Use Class C3). This is consistent with the with the Council's concern that development of student housing may limit the availability of sites for conventional homes in Camden and the specification of self-contained housing as the priority land-use of the Local Plan in Policy H1. However, where education development is proposed to</p>	Neutral. The modifications provide greater emphasis on the requirement for self-contained housing in some locations and circumstances, but greater flexibility in some circumstances over the balance between the delivery of self-contained housing on-site and development of other uses.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>serve an institution supported by the Higher Education Funding Council for England, as an alternative to seeking self-contained housing, the Council may support a mixed-use development including student housing that serves the same institution, subject to the student housing satisfying the requirements of Policy H9.</p> <p><u>3.48A</u> [was the final sentence of para 3.46] <u>To ensure that housing</u> Housing provided as part of a mixed use scheme <u>contributes to meeting the targets identified in Policy H1, rather than being used as ancillary space by non-residential occupiers, the homes</u> should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.</p> <p><u>3.48B</u> [was para 3.63] Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought. Policy H4 sets out when we will seek affordable housing, and the quantity and type of affordable housing we expect.</p>	
MM12	Para 3.49 – 3.55	<p><u>Appropriateness of seeking housing and on-site provision</u> <u>Whether the housing should be provided on site or off site</u></p> <p>3.49 Where Policy H2 applies to a development the Council will initially consider whether it is appropriate to seek housing in association with the development. Key factors will be the character of the area and whether another use has priority (i.e. jewellery in Hatton Garden), community safety, the compatibility of self-contained housing with proposed and nearby uses, and whether the development serves a public purpose (criteria a, c, d, e and g). A development of 200 sqm (GIA) is considered the minimum size that can reasonably accommodate one or two homes together with a non-residential activity, so provision of housing will not be sought</p>	Neutral. The modifications provide greater emphasis on the requirement for self-contained housing in some locations and circumstances, but greater flexibility in some circumstances over the balance between the delivery of self-contained housing on-site and development of other uses.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM12 (cont)		<p>from non-residential developments of less than 200 sqm (GIA).</p> <p>3.50 Inclusion of self-contained housing <u>on-site</u> as part of a mixed use development offers the best prospect for <u>achieving the benefits set out in paragraph 3.43 and</u> creating a complementary range of activities across an area with continuous activity and natural surveillance. Where the Council considers that provision of housing is appropriate, we will seek provision on the development site. Where development adds 1,000 sqm (GIA) or more floorspace, the Council considers that it will generally be possible to achieve a significant number of homes on-site together with <u>sufficient to support the stairs, lifts and</u> circulation space needed to serve them, and will therefore particularly expect on-site provision.</p> <p>3.51 However, there There may be circumstances (even when the additional floorspace is 1,000 sqm or more) where the provision of housing is appropriate but cannot practically be achieved on-site <u>or would more appropriately be provided off-site</u> (for example where the entire <u>additional</u> floorspace is needed for an existing user). <u>Relevant considerations are set out in paragraphs 3.52 to 3.60.</u> Where the Council considers that <u>off-site provision</u> it is appropriate to seek housing in association with the development but accepts that on-site provision is not practical, we will seek an off-site contribution to affordable housing this will be secured through a planning obligation. There is intense competition for development sites in Camden, which creates a risk that no site will become available for delivery of the housing if it cannot be identified by the time the non-residential application is determined. Consequently, the Council will normally expect the planning obligation to specify the anticipated delivery site (or sites).</p> <p>3.52 Where the Council accepts that on-site provision is not practical</p>	

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p><u>For off-site provision</u>, we will assess how much housing is required by looking at all sites involved in the arrangement...</p> <p>[the remaining parts of para 3.52 and para 3.53 are unchanged]</p> <p>3.54 Exceptionally, where the Council considers that provision of housing is <u>required appropriate</u>, on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation.</p> <p>3.55 More detailed information regarding the calculation of off-site provision and payments in lieu is provided in our supplementary planning documents <u>Camden Planning Guidance 2: Housing and Camden Planning Guidance 8: Planning Obligations</u>.</p>	
MM13	Para 3.56 - 3.63	<p>Achieving an appropriate mix of <u>housing and other uses</u></p> <p>3.56 <u>Where housing is required as part of a mix of uses, all criteria in Policy H2, provides a set of criteria including criteria (a) to (e), will be used to help us consider the appropriate mix of housing and other uses for a site, and whether self-contained the housing should be provided on the site or elsewhere. These will be used to consider proposals throughout the borough, including proposals in the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road. Details of how these criteria will be applied are set out in supplementary planning document Camden Planning Guidance 2: Housing (including the assessment of financial viability), but a number of key considerations are set out below.</u></p>	Neutral. The modifications provide greater emphasis on the requirement for self-contained housing in some locations and circumstances, but greater flexibility in some circumstances over the balance between the delivery of self-contained housing on-site and development of other uses.

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MM13 (cont)		<p>3.57 The character of a development, site and an area and existing uses in the area and on the site may influence the mix of uses that is most appropriate (including site size) will influence whether it can accommodate housing or the separate access or circulation spaces needed to accommodate multiple uses. Factors to be considered include whether existing buildings need to be retained on site (e.g. heritage assets) and whether other activities or buildings in the area would prevent an acceptable standard of residential amenity from being achieved. Residential or non-residential uses may need to be introduced into an area to add to community safety, for example by adding to the diversity and vitality of streets where there is limited activity at certain times of the day or week, or ensuring that street activity can be seen by nearby residents.</p> <p>3.58 In some areas it may be necessary to strike a balance between the need to meet the space requirements of a particular activity or user may outweigh and the priority given to housing. The Council places a high priority on ensuring premises are available to sustain Hatton Garden's nationally and internationally important cluster of jewellery manufacture and trading (see also Policies E1 and E2). Many other Central London activities have a national and international function and make major contributions to Camden's economy, and their needs will be given significant weight. The Council supports the institutions and activities that comprise the Knowledge Quarter in the general area of King's Cross, Euston Road and Bloomsbury, such as the Wellcome Institute and the various components of the University of London, and their requirements may be foremost in particular locations.</p> <p>3.59 Many non-residential uses can be located adjacent or below</p>	

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM13 (cont)		<p>residential uses without difficulty. By definition, business uses within Use Class B1 should be capable of operating in residential areas without having an adverse impact on residential amenity. Amenity may also be protected by design features and planning conditions (for example, requiring attenuation of noise/ vibration or limiting operating hours). However, we will consider whether proposed uses have particular requirements that would limit the potential for including housing on site. For example hospitals and medical institutions may require 24 hour operation, privacy or controlled environments.</p> <p>3.60 The Council is committed to promoting and facilitating growth, and we will seek to ensure that the operation of Policy H2 encourages deliverable development and helps growth to take place. We will take into account the space needs of existing users, <u>and seek to ensure that they can expand without relocating, and way the development will be financed.</u> Where a development is publicly funded or serves a public purpose (such as a dedicated facility for an educational, medical or research institution), we will consider whether this would prevent the developer from funding the supply of housing. Where a commercial development is proposed, we <u>We</u> will <u>also</u> consider whether a viable development requires a particular amount or layout of commercial space.</p> <p><u>3.60A</u> [moved from para 3.62] The Council will positively consider alternative approaches that can better deliver a supply of land for self-contained housing, for example making a site available for housing development by another organisation such as the Council or a Housing Association. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver a mixed-use scheme containing housing e.g. the impact of providing</p>	

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM13 (cont)		<p>a new station entrance to promote public transport.</p> <p><u>3.60B</u> [moved from para 3.60] In negotiating the appropriate mix of uses, the Council will consider all aspects of financial viability including particular costs associated with the development and the distinctive viability characteristics of particular development sectors (such as build-to-let housing). We will generally expect submission of a financial viability appraisal to justify the mix proposed, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. Where the proposed contribution to affordable housing falls significantly short of the Policy H2 target or the appraisal raises doubts about the deliverability of the development, the Council may also seek an independent verification of the appraisal funded by the developer.</p> <p>3.61 In the Central London Area and the town centres listed in Policy H2, where provision of self-contained housing is appropriate <u>required</u> but financial viability constraints prevent a development from meeting the 50% housing target and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution (similar to 'contingent obligations' referred to in London Plan Policy 3.12). The deferred contingent contribution will be based on the shortfall between the initial contribution and the target having regard to any uses introduced as an alternative to housing (e.g. jewellery workshops in Hatton Garden). We will seek contingent contributions from single phase and multiphase schemes, and expect financial viability to be reviewed close to substantial completion. We believe these</p>	

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM13 (cont)		<p>provisions are justified by Camden's particular circumstances, notably the small size of Camden's development sites, the high rate and scale of house price rises, the unpredictability of prices in premium locations, the potential for cost-engineering (particularly for high specification designs) and the risk of build-cost inflation. Our supplementary planning document Camden Planning Guidance 2: Housing provides more detailed guidance on the operation of deferred contingent contributions.</p> <p>3.62 [moved to para 3.60A] The Council will positively consider alternative approaches that can better deliver a supply of land for self-contained housing, for example making a site available for housing development by another organisation such as the Council or a Housing Association. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver a mixed-use scheme containing housing e.g. the impact of providing a new station entrance to promote public transport.</p> <p>Affordable housing in mixed-use schemes</p> <p>3.63 [moved to para 3.48B] Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought. Policy H4 sets out when we will seek affordable housing, and the quantity and type of affordable housing we expect."</p>	
MM14	Policy H4	<p>In the first sentence of Policy H4, amend the strategic target to 5,300, and delete "2015-2030" and replace it with "2016/17 - 2020/31", as follows:</p> <p>"The Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,565 <u>5,300</u> additional affordable homes from 2015-2030 <u>2016/17 – 2030/31</u>, and aim for an</p>	Neutral. The modified target reflects an updated estimate of the amount and type of homes the Plan will deliver. The modification does not change the Plan's approach and therefore will have no significant effect on the sustainability impact

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		appropriate mix of affordable housing types to meet the needs of households unable to access market housing."	of the Plan.
MM15	Policy H4	<p>In the second paragraph of Policy H4, amend the first sentence to clarify the affordable housing threshold, as follows:</p> <p>"We will expect a contribution to affordable housing from all developments that include housing and provide one or more additional homes and involve a total addition to residential floorspace of 100 sqm GIA or more."</p>	Neutral. The modification does not change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM16	Policy H4	<p>"(g) for developments with a site area of 0.5 ha or greater, the Council may seek affordable accommodation for Camden's established traveller community as part or all of the affordable housing contribution, subject to the requirements of Policy H11 (Accommodation for Travellers);"</p>	Neutral. Minor negative impact in terms of social exclusion objective 4(a) as removal of this requirement could make delivery of housing for travellers more difficult to achieve. This is mitigated by a minor positive impact on housing objectives 1(a) and (b) as the modification may enable a greater number of homes to be delivered from sites of over 0.5 ha.
MM17	Para 3.88	<p>"For the purposes of this policy, social and affordable rented housing are considered together as 'social-affordable rented housing', which reflects the approach of the London Plan. Detailed information on the mix of affordable tenures and rent levels sought in Camden are included in our supplementary planning document Camden Planning Guidance 2: Housing. Following adoption of the Local Plan, the Council will consult on revised Camden Planning Guidance, taking into account the GLA Funding Guidance for London Affordable Rent and the finalised version of the Mayor's Affordable Housing and Viability SPG, which will provide detail on the preferred mix of tenures for each borough and information on where the latest benchmark rents can be found. However, the Camden Affordable Rent Study 2011 indicates that the cost of larger market homes in Camden is far beyond the reach of most families in housing need. Consequently, in seeking social affordable rented housing, we will give</p>	Neutral. The modification does not change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		priority to family homes (with 3 or more bedrooms) at or around the level of guideline targets for social rents as resources and development viability permit."	
MM18	Para 3.89	"The government is introducing <u>Housing and Planning Act 2016</u> provides for the introduction of Starter Homes as a way to help first-time buyers who are at least 23 years old but not yet under 40 to buy their own home at a discount price. Starter Homes should be offered at a discount of at least 20% below market value, and are subject to a price cap (in London the price cap has initially been set at <u>they should cost no more than £450,000</u> , (based on the average price paid by a first-time buyer). Starter Homes in Camden are likely to cost more than renting in the private sector, so they would not fall within the current definition of affordable housing. "	Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM19	Para 3.90	"The government is considering measures <u>has consulted on proposed Starter Homes Regulations and changes to the National Planning Policy Framework (NPPF) that would allow developers to require certain types of development to include a set percentage of Starter Homes in development as an alternative to</u> and broaden the definition of affordable housing to include homes sold for discount market sale. Where Starter Homes are substituted for affordable housing in development proposals, the Council will expect them to replace affordable home ownership products (primarily shared ownership), and will seek to ensure that proposals continue to include some affordable homes for rent (social-affordable rent or intermediate rent). When the Starter Homes Regulations and amended NPPF are published, the Council will consider their impact on policies relating to affordable housing, provide guidance in our supplementary planning documents, and propose changes to the Local Plan if necessary. Starter Homes are considered further in Policy H6 of the Plan and supporting paragraphs.	Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM20	Para 3.93	Amend paragraph 3.93 to update strategic affordable housing target and indicate that it has been informed by a delivery estimate as follows: 3.93 Camden has a particularly large requirement for additional	Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>affordable homes, estimated by the Camden SHMA to be around 10,000 homes for the 15-year Plan period. As indicated in Policy H1, on the basis of the London Plan and the London SHLAA we seek to exceed a target of 16,800 homes in total from 2016-2031, including 11,130 additional self-contained homes. To set a target for affordable housing we have considered <u>estimated</u> the level of provision likely to be viable and deliverable, taking into account the relationship between development costs, the value of market and affordable homes, the government's intention to focus housing subsidy on boosting home ownership, the income households have to spend on housing, affordable housing need, and the anticipated housing output of the Council's Community Investment Programme. Balancing these considerations, the Council considers that it is feasible for the borough to <u>meet a secure 50% of the self-contained housing target as affordable homes, which equates to our strategic target of 5,565 5,300 additional affordable homes over the Plan period.</u>"</p>	<p>on the sustainability impact of the Plan.</p>
MM21	Para 3.95 , 3.96	<p>3.95 The government issued guidance in 2014 creating a national affordable housing threshold and advising that councils should not seek affordable housing from developments involving 10 homes or less, or 1,000 sqm or less. <u>Following legal challenges, this guidance was confirmed in 2016</u> The High Court has subsequently quashed the guidance, but the government has said it will seek to reinstate the threshold.</p> <p>3.96 Given the scale of affordable housing need in the borough, the Council's aspiration is that as many residential developments as possible should provide affordable housing. The Camden Local Plan Viability Study shows that there is no direct correlation between scheme size and viability, and there is no viability basis for an affordable housing threshold or a lower target for smaller schemes. <u>Through the Local Plan process, the Council has made provision for the Local Plan to seek affordable housing from smaller</u></p>	<p>Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>schemes as an exception to the national threshold. The Council has therefore devised an Policy H4 therefore sets out:</p> <ul style="list-style-type: none"> • <u>an affordable housing threshold of one or more additional homes involving a total addition to residential floorspace of 100 sqm GIA or more; and</u> • <u>affordable housing targets based on a sliding scale which will apply to any proposal involving one or more additional homes and a total addition to residential floorspace of 100 sqm GIA or more.</u> <p>The sliding scale has been set to achieve the maximum reasonable contribution overall without deterring development, causing delays to decision-making, increasing the burden of financial viability appraisals, or (if the national threshold is reinstated) risking creation of a high starting target that supresses scheme or dwelling size.</p>	
MM22	Para 3.104 -3.15	<p>3.104 For schemes which involve one or more additional homes, we will assess their overall capacity for additional homes, starting from the proposed addition to floorspace. Having regard to the nationally described space standard (London Plan Table 3.3), we will generally assess an additional 100 sqm GIA residential floorspace as having capacity for one additional home. <u>In order to avoid deterring small extensions to existing residential blocks and or distorting the size of dwellings within them, we will not seek an affordable housing contribution from developments that involve less than 100 sq m of additional residential floorspace, including:</u></p> <ul style="list-style-type: none"> • <u>schemes that involve the subdivision of existing housing to create more homes;</u> • <u>schemes that provide one home of 90 sqm GIA; and</u> • <u>schemes that provide two homes of 45 sq m GIA each.</u> <p><u>3.104A</u> [was the second part of 3.104] A development is able to provide a mix of large and small homes consistent with Policy H7 whilst complying with the space standard</p>	Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM22 (cont)		<p>and achieving an average of 100 sqm GIA per home. <u>We will therefore assess the capacity for additional homes on the basis of multiples of 100 sq m GIA, rounding the additional residential floorspace to the nearest 100 sq m GIA so the assessed capacity will always be a whole number. An additional 1,200 sq m GIA will generally have capacity for 12 homes, an additional 1,800 sq m GIA will generally have capacity for 18 homes, and an additional 2,400 sq m GIA will generally have capacity for 24 homes.</u> However, we will take into account any constraints on capacity where existing buildings are converted (particularly Listed Buildings and other heritage assets), or where ancillary residential space would be unable to provide dwellings (e.g. due to lack of natural light). <u>The assessed capacity for additional homes will be used to determine the percentage affordable housing required in accordance with sliding scale set out in Policy H4 criteria (d) and (e) and paragraph 3.106.</u></p> <p>3.105 We will apply affordable housing targets on the basis of seeking sliding scale directly to the specified percentage of additional proposed addition to residential floorspace rather than to the number of homes or 'units' or the capacity for additional homes. <u>We will use the affordable housing targets to seek a proportion of the proposed addition to residential floorspace as on-site affordable housing, except in the case of proposals with capacity for 10 or fewer additional homes where we may accept a payment in lieu of affordable housing (see paragraph 3.108).</u> The use of floorspace in negotiation ensures that we are able to secure large affordable homes with 3 bedrooms or more. Seeking large affordable homes is consistent with London Plan priorities. Negotiating on the basis of number of 'units' would incentivise the delivery of small affordable homes and exacerbate the skew towards one- and two-bedroom homes in our existing affordable</p>	

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		supply.	
MM23	Para 3.107	"3.107 The government is likely to reinstate a national affordable housing threshold at around 10 homes/ 1,000sq m. For schemes where there is no existing housing, the effect of such a threshold on Camden's sliding scale would be that the starting contribution would be around 20%. The remaining part of the sliding scale would serve to ease the distorting effect of the affordable housing threshold. If the Council adopted a flat rate affordable housing target of 50%, very few developments slightly above the threshold would be delivered as a scheme with nine homes (all for market sale) would usually have a higher value than a scheme with twelve homes (only six homes for market sale or approximately 600 sq m GIA)."	Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM24	Paras 3.115 – 3.116	"3.115 As indicated in Policy H11 (Accommodation for Travellers) and supporting paragraphs, the Council has identified a need for up to 16 additional pitches for Camden's established traveller community over the Plan period. The Council anticipates that the pitches or alternative accommodation needed in the early part of the Plan period will be made available from land in the Council's ownership, but that provision in later years should form part of larger development sites. National planning policy for traveller sites indicates that councils should promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites. Consequently, Policy H6 (Housing Choice and Mix) seeks the inclusion of traveller accommodation (private or affordable) as part of any developments involving housing that have a site area of 0.5 ha or greater, while Policy H4 provides for us to seek an affordable element of traveller accommodation from sites of this scale. Schemes with a site area of 0.5 ha or greater as such schemes offer the best potential to secure an appropriate relationship between relatively low density accommodation for travellers and the higher densities we would generally expect for more conventional housing development under Policy H1 (Maximising Housing Supply).	Neutral. Minor negative impact in terms of social exclusion objective 4(a) as removal of this requirement could make delivery of housing for travellers more difficult to achieve. This is mitigated by a minor positive impact on housing objectives 1(a) and (b) as the modification may enable a greater number of homes to be delivered from sites of over 0.5 ha.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>3.116 In some cases we may seek affordable traveller accommodation and forego private accommodation, depending on the resources available to the community. Any accommodation for travellers is likely to be a relatively low density and low value use, and the inclusion of affordable accommodation would be expected to have a substantial impact on viability. We therefore recognise through Policy H4 that affordable accommodation for travellers would be provided in place of some or all the affordable housing we would otherwise seek to meet general needs. In considering whether affordable traveller accommodation should be sought and the scale and nature of provision, the Council will also take into account all relevant criteria in Policy H4 and Policy H11."</p>	
MM25	Policy H6	<p>We will seek to secure high quality accessible homes in all developments that include housing. We will:</p> <ul style="list-style-type: none"> a. <u>encourage design of all housing to provide functional, adaptable and accessible spaces;</u> a-b. <u>expect all self-contained homes to meet the nationally described space standard;</u> b c. <u>require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); and</u> e d. <u>require 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3); and</u> d. <u>where the full requirements of Building Regulation M4(2) and M4(3) cannot be secured, seek design of 10% of homes in each development to meet M4(3) requirements as far as possible, and for any homes in the development that are not broadly consistent with M4(3), seek design to meet M4(2) requirements as far as possible.</u> 	<p>Neutral impact overall. The removal of criterion d of Policy H6 is likely to have a minor negative impact on social exclusion objective 4(a) as there will be less potential to achieve specific accessibility features in homes created from the conversion of buildings. However, additional criterion (a) and the new paragraph after paragraph 3.138 will have a minor positive impact on housing objective 1(e) by encouraging consideration of accessibility and changing household needs in the design of all housing.</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM26	Policy H6	<p>Where housing is proposed as part of development with a site area of 0.5 ha or greater, we will expect the development to make provision for particular housing needs. For such sites, the Council will particularly seek to address the need for serviced plots available to people wishing to build their own homes and accommodation for Camden's established traveller community, but may also support the inclusion of housing for older people or vulnerable people, student housing, or other housing with shared facilities. In considering the scale and nature of provision for particular housing needs that would be appropriate, the Council will take into account:</p> <p>j. criteria in Policies H8, H9, and H10 and H11 <u>criteria in Policies H8, H9, and H10 and H14 where applicable;...</u>"</p>	<p>Neutral. Minor negative impact in terms of social exclusion objective 4(a) as removal of this requirement could make delivery of housing for travellers more difficult to achieve. This is mitigated by a minor positive impact on housing objective 1(a) as the modification may enable a greater number of homes to be delivered from sites of over 0.5 ha.</p>
MM27	After para 3.138	<p><u>3.138A London Plan Policy 3.5 indicates that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose and meet the changing needs of Londoners over their lifetimes. The Local Plan therefore encourages design of all new housing to provide functional, adaptable and accessible spaces. In addition, the Local Plan applies specific space standards to all proposals for new self-contained homes, and applies specific accessibility requirements to all proposals for new-build homes that are self-contained, as set out in the following paragraphs.</u></p>	<p>Minor positive impact in terms of housing objectives by encouraging consideration of accessibility and changing household needs in the design of all housing. This modification is linked to the modification that adds a new criterion (a) to Policy H6, and helps to mitigate the minor negative impact on social exclusion arising from deletion of criterion (d) in Policy H6, and deletion of supporting material in paragraph 3.149.</p>
MM28	Paras 3.149 and 3.151	<p>3.149 Where optional Building Regulations cannot be applied in full, we will encourage developers to meet requirements as far as possible. In such cases, we will encourage design of 10% of homes to meet M4(3) requirements as far as possible. For any homes in the development where it is not possible to achieve a design that is broadly consistent with M4(3), we will seek their design to meet M4(2) (accessible and adaptable dwellings) as far as possible. Where optional Building Regulations cannot be secured in full by planning conditions, we may seek to use planning obligations to secure features that enhance the</p>	<p>Minor negative impact on social exclusion objectives as the consequence of removal of reference to requirements where Building Regulations cannot be met will reduce potential to achieve specific accessibility features in homes created from the conversion of buildings. However, this is mitigated by:</p> <ul style="list-style-type: none"> - the rounding mechanism in the replacement text which ensures that 100%

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM28 (cont)		<p>accessibility of the housing proposed. In applying the requirement for 90% M4(2) accessible and adaptable dwellings and 10% M4(3) wheelchair user dwellings, the Council will round the number of homes required in each category to the nearest whole number such that the total requirement for M4(2) and M4(3) dwellings adds up to 100%. The Council will not require M4(3) wheelchair user dwellings as part of developments that provide five additional dwellings or fewer.</p> <p>3.150 The Council will generally apply the requirement for 10% wheelchair user dwellings across each housing type or tenure in a scheme, seeking 10% of market housing, 10% of social-affordable rented housing and 10% of intermediate housing. We may seek to increase the percentage of wheelchair user dwellings in the social-affordable sector and reduce the percentage in the market and/ or intermediate sectors where this will enable us to meet an identified need for wheelchair users in social-affordable housing.</p> <p>3.151 <u>In the market and intermediate sectors, we will use planning conditions to secure wheelchair user dwellings that comply with Part M4(3)(2)(a) requirements for "wheelchair adaptable" dwellings.</u> Households that include a wheelchair user are much more likely to occupy social rented housing than other tenures, and the waiting list for wheelchair user dwellings far exceeds supply. In the case of social-affordable rented housing, future occupiers can be nominated from the Housing Register (waiting list), and from transfer lists. The Council will therefore require 10% of social-affordable rented housing in each development to be "wheelchair accessible" and be fully fitted-out for occupation by a household containing a wheelchair user. We will use planning conditions to specify those social-affordable homes that must comply with Part M4(3)(2)(b) requirements for "wheelchair</p>	<p>of new-build homes will meet M4(2) or M4(3) requirements;</p> <p>- additional criterion (a) in Policy H6 and the new paragraph after paragraph 3.138 which will have a minor positive impact on housing objectives by encouraging consideration of accessibility and changing household needs in the design of all housing.</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		accessible” dwellings.	
MM29	Para 3.161	<p>“The government is introducing Housing and Planning Act 2016 provides for the introduction of Starter Homes as a way to help first-time buyers who are at least 23 years old but not yet under 40 to buy their own home at a discount price. Starter Homes should be offered at a discount of at least 20% below market value, and are subject to a price cap (in London the price cap has initially been set at they should cost no more than £450,000 (based on the average price paid by a first-time buyer). Starter Homes in Camden are likely to cost more than renting in the private sector, but could cost considerably less than full market value.</p>	Neutral. The modification does not substantially change the Plan’s approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM30	Para 3.162	<p>The government is considering measures that would Housing and Planning Act 2016 requires councils to promote Starter Homes. The government has consulted on proposed Starter Homes Regulations that would require certain types of development and allow developers to include a set percentage of Starter Homes in development as an alternative to more traditional forms of affordable housing. Policy H6 provides for the Council to comply with government Starter Home requirements once they come into effect. A supply of Starter Homes in the borough may have some potential to retain middle-income households that would otherwise have to move elsewhere to satisfy aspirations for owner-occupation, although the Council will need to weigh the aspirations of these households against other housing needs. Where Starter Homes are substituted for affordable housing in development proposals, the Council will expect them to replace affordable home ownership products (primarily shared ownership).</p>	Neutral. The modification does not substantially change the Plan’s approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM31	Paras 3.179 – 3.180	<p>Camden’s traveller community 3.179 As indicated in Policy H11 (Accommodation for Travellers) and supporting paragraphs, the Council has identified a need for up to 16 additional pitches for Camden’s established traveller community over the Plan period. The Council intends to identify sites on its own land with potential to meet some of this need. National planning policy for traveller sites indicates that councils</p>	Neutral. Minor negative impact in terms of social exclusion objective 4(a) as removal of this requirement could make delivery of housing for travellers more difficult to achieve. This is mitigated by a minor positive impact on housing objective 1(a) as the modification may enable a greater

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>should promote more private traveller site provision. The Council considers that provision for the traveller community in conjunction with large developments involving other types of housing offers the best prospect for bringing forward suitable land and securing an appropriate relationship between relatively low density accommodation for travellers and the higher densities we would generally expect for more conventional housing development under Policy H1 (Maximising Housing Supply). Consequently, Policy H6 (Housing Choice and Mix) seeks the inclusion of traveller accommodation (private or affordable) as part of any developments involving housing that have a site area of 0.5 ha or greater, while Policy H4 provides for us to seek an affordable element of traveller accommodation from sites of this scale.</p> <p>3.180 Travellers commonly live on pitches providing for a static caravans supported by an amenity block, but Policy H11 Accommodation for Travellers and supporting paragraphs indicate that it may be possible to meet the needs of some traveller households with alternative forms of accommodation that support their lifestyle. It may be possible to offer serviced land to meet the needs of traveller households, possibly in conjunction with serviced plots for self-build and custom build. The extent of any resources available to the traveller community is not known, so the Council may allow developers to test the strength of interest in serviced plots for private traveller accommodation before a decision is made on whether provision should be made on any particular large site."</p>	<p>number of homes to be delivered from sites of over 0.5 ha.</p>
MM32	Para 3.242	<p>"3.242 We consider that there are already identified sites with potential to <u>meet provide more than 2,200 places in student housing from 2016/17 to 2030/31, which is over 90% of the student housing target. The Council's housing trajectory (included in the Local Plan as Appendix 4) London SHLAA indicates that student housing forms the predominant supply of additional non-self-</u></p>	<p>Neutral. The modifications reflect an updated estimate of the amount and type of homes the Plan will deliver. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>contained housing in London, and that Camden has a pipeline of sites with planning permission for <u>expected to deliver over 9004,000 additional student housing places from 2016/17 to 2020/21</u> (SHLAA Appendix 4). The pipeline represents sufficient deliverable sites to meet the target for student housing for the first five years of the Local Plan period. Camden's Site Allocations Document 2013, the Fitzrovia Area Action Plan and the Euston Area Plan also designate further sites where student housing could be developed, in most cases as part of a mixed-use scheme. Together we consider <u>The housing trajectory indicates that these represent sufficient developable sites to meet the provide 1,300 places in student housing target for over the subsequent ten years of the Plan period. A full review of the Site Allocations document is expected to commence when the current Local Plan proceeds to adoption, and will identify any further sites needed to meet the student housing target in full over the entire Plan period.</u>"</p>	<p>impact of the Plan.</p>
MM33	Policy H11	<p>Amend policy H11 "We will identify deliverable sites to meet or exceed Camden's projected need for two to seven additional pitches for the established traveller community by 2020/21 and seek to identify developable sites or broad locations to meet Camden's projected need for a further seven to nine additional pitches by 2030/31."</p>	<p>Neutral. The modification will may have a positive impact on social exclusion objective 4(a) as it replaces the range of traveller pitch requirements with a single requirement based on the former maximum, but the impact of this modification is uncertain prior to the proposed review of the Camden Site Allocations 2013. The modification may therefore help to mitigate the minor negative impact of the modifications to Policy H11 and associated paragraphs that delete an intention to seek provision of traveller accommodation on sites of 0.5 ha or more. Overall the modification will have no significant effect</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM34	Policy H11	<p>Delete the fourth paragraph.</p> <p>"In accordance with Policies H4 and H6, where housing is proposed as part of a development of 0.5 ha or greater, we will expect the development to provide accommodation for Camden's established traveller community, and may seek affordable accommodation for this community as part or all of the affordable housing contribution."</p>	<p>on the sustainability impact of the Plan.</p> <p>Neutral. Minor negative impact in terms of social exclusion objective 4(a) as removal of this requirement could make delivery of housing for travellers more difficult to achieve. This is mitigated by a minor positive impact on housing objective 1(a) as the modification may enable a greater number of homes to be delivered from sites of over 0.5 ha. The negative impact may also be mitigated by the possible positive impact of the modification to Policy H11 replacing the range of traveller pitch requirements with a single requirement based on the former maximum, but the impact of this modification is uncertain prior to the proposed review of the Camden Site Allocations 2013.</p>
MM35	Paras 3.286 – 3.287	<p>3.286 The Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014 (the Accommodation Assessment) indicated that up to 16 additional pitches could <u>will</u> be required for Camden's established traveller community by 2031. This is made of up households on the waiting list for pitches and the anticipated growth in the number of households from 2013 to 2031. Households on the waiting list include a number of households who currently live on an overcrowded site and do not have their own pitch, and a number of households who currently live in bricks and mortar homes.</p> <p>3.287 The government's 'Planning policy for traveller sites' has been revised since the Accommodation Assessment was completed, and the Assessment is not fully consistent with all aspects of the</p>	<p>Neutral. The modification will may have a positive impact on social exclusion objective 4(a) as it replaces the range of traveller pitch requirements with a single requirement based on the former maximum, but the impact of this modification is uncertain prior to the proposed review of the Camden Site Allocations 2013. The modification may therefore help to mitigate the minor negative impact of the modifications to Policy H11 and associated paragraphs that delete an intention to seek provision of traveller accommodation on sites of 0.5 ha or more. Overall the</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>policy. The Accommodation Assessment does not establish whether all the households on the waiting list and in bricks and mortar homes have a housing need or a nomadic habit of life. Consequently, the Council will engage with the established traveller community, representative bodies, support groups and the wider community to consider whether an updated assessment should be carried out, and what form it should take. In the interim, the Plan presents <u>adopts the full</u> need for additional pitches <u>from the Accommodation Assessment, namely seven as a range.</u> Based on the history of overcrowding at one of the existing sites, we have assessed the minimum need as two additional pitches by 2021 (with a maximum of seven), and a further seven <u>nine</u> additional pitches from 2021-31 (with a maximum of nine), to give a total of nine <u>sixteen</u> additional pitches minimum over the whole period (with a maximum of 16)."</p>	<p>modification will have no significant effect on the sustainability impact of the Plan.</p>
MM36	Para 3.291	<p>Amend the penultimate sentence of paragraph 3.291 to remove reference to a range of pitch needs follows: "... Through this process, we aim to identify sufficient land to accommodate from two to seven traveller households. The land is likely to take the form of a number of small sites rather than a single large site."</p>	<p>Neutral. The modification will may have a positive impact on social exclusion objective 4(a) as it replaces the range of traveller pitch requirements with a single requirement based on the former maximum, but the impact of this modification is uncertain prior to the proposed review of the Camden Site Allocations 2013. The modification may therefore help to mitigate the minor negative impact of the modifications to Policy H11 and associated paragraphs that delete an intention to seek provision of traveller accommodation on sites of 0.5 ha or more. Overall the modification will have no significant effect on the sustainability impact of the Plan.</p>
MM37	Paras	<p>"3.295 Seeking accommodation for travellers in conjunction with large</p>	<p>Neutral. Minor negative impact in terms of</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
	3.295, 3.296 and 3.297	<p>developments involving other types of housing offers the best prospect for bringing forward suitable land and securing an appropriate relationship between relatively low density accommodation for travellers and the higher densities we would generally expect for more conventional housing development (under Policy H1 Maximising housing supply). National planning policy for traveller sites indicates that councils should promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites. Consequently, Policy H6 Housing choice and mix seeks the inclusion of traveller accommodation as part of any developments involving housing that have a site area of 0.5 ha or greater, while Policy H4 provides for us to seek an affordable element of traveller accommodation from sites of this scale.</p> <p>3.296 In some cases we may seek affordable traveller accommodation and forego private accommodation, depending on the resources available to the community. Any accommodation for travellers is likely to be a relatively low density and low value use, and the inclusion of affordable accommodation would be expected to have a substantial impact on viability. We therefore recognise through Policy H4 that affordable accommodation for travellers would be provided in place of some or all the affordable housing we would otherwise seek to meet general needs.</p> <p>3.297 Policy H6 (Housing choice and mix) also expects large development sites involving housing to provide serviced plots for people wishing to build their own homes. If engagement with the traveller community shows that lightweight forms of construction could provide living accommodation suitable to meet travellers' needs it may be possible for provision to be made in conjunction with serviced plots for self build and custom build."</p>	social exclusion objective 4(a) as removal of this requirement could make delivery of housing for travellers more difficult to achieve. This is mitigated by a minor positive impact on housing objective 1(a) as the modification may enable a greater number of homes to be delivered from sites of over 0.5 ha. The negative impact may also be mitigated by the possible positive impact of the modification to Policy H11 replacing the range of traveller pitch requirements with a single requirement based on the former maximum, but the impact of this modification is uncertain prior to the proposed review of the Camden Site Allocations 2013.
Community, health and wellbeing			
MM38	Policy C2	"The Council will:	Neutral. Replacement text provides greater

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
	a)	<p>“a) require development that increases the demand for community facilities and services to make appropriate contributions towards enhancing existing provision. seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments. The Council may also fund improvements to community facilities using receipts from the Community Infrastructure Levy where this is identified on the Council’s CIL Funding List;</p>	<p>clarity as to the aims of the policy without altering its approach or impact on sustainability objectives.</p>
MM39	Policy C2 -	<p>g (i) a replacement facility of a similar nature is provided that meets the needs of the local population <u>or its current, or intended, users</u></p>	<p>Minor positive. The modification acknowledges that community facilities in Camden affect a wider than local population to which they are based.</p>
MM40	Para 4.26	<p>“4.26 The Council will seek section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing community infrastructure and services is met. The Council began collecting the Community Infrastructure Levy (CIL) on 1 April 2015 and Over the plan period, this will provide funding towards community infrastructure alongside site-specific planning obligations to mitigate the impact of individual schemes projects identified on the Council’s CIL Funding List (sometimes referred to as the ‘Regulation 123 List’). The Funding List sets out the infrastructure projects and types of infrastructure to which CIL funding will be applied and which, by default, section 106 planning obligations will not be sought. The Funding list will be updated in light of changing priorities and the availability of funding. It is expected that the ward-level element of CIL may be used to enhance local community facilities. The Council has developed a ward member-led spending system for the local element of CIL. It is expected that a significant proportion of this income will provide funding for community infrastructure.</p>	<p>Neutral. The modification will have no significant effect on the sustainability impact of the Plan.</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>[NEW PARA] 4.26A “When we use Section 106 agreements, we will take into account viability as a factor in determining the types of facilities or services that are required and the timeframe in which these can be delivered. <u>In addition, the Council recognises that the pooling of planning obligations is limited to a maximum of five section 106 agreements per infrastructure project or type of infrastructure.</u> The Council will also not seek contributions for community infrastructure and services from small scale and self-build developments in line with the circumstances set out in the <u>National Planning Practice Guidance.</u> The Council will use strategies relating to the accommodation requirements of the public and voluntary sectors when establishing need and local priorities for community infrastructure identified through consultation on neighbourhood and ward CIL spending.</p>	
MM41	Para 4.44	<p>“Where an alternative community use cannot be found for the existing facility, the Council will seek the provision of affordable housing as its preferred alternative use. <u>Community facilities generally have a relatively low capital value compared with housing sites. We will seek the maximum reasonable amount of affordable housing in accordance with Policy H4, having regard to financial viability. We will expect the proportion of affordable housing to reflect the value of the development site in its former community use.</u>” This means that the viability of affordable housing provision is likely to be enhanced. The proportion of affordable housing must, therefore, reflect the value of the premises or site in its former community use. Affordable housing should be provided in accordance with Policy H4.”</p>	<p>Minor positive. The modification should increase awareness of the difference in land use values, promoting provision of affordable housing.</p>
MM42	Policy C3	<p>Amend the first paragraph and the delete the second as follows: The Council will <u>seek to protect cultural and leisure facilities and manage the impact of adjoining uses where this is likely to impact on their continuing operation</u> valued by the community, including protected groups and which are an important identity of the Borough or local area, cultural variety and richness, health and wellbeing, townscape, heritage and the economy.</p>	<p>Neutral. Replacement text provides greater clarity as to the aims of the policy without altering its approach or impact on sustainability objectives.</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		We will also protect cultural and leisure uses, particularly Camden’s live music venues and theatres, from other conflicting uses which are likely to adversely impact their continued operation.	
MM43	Policy C3	Insert additional text into fourth paragraph “Exceptionally it may be practicable for a cultural or leisure facility to be re-provided elsewhere <u>on-site through redevelopment, or elsewhere in the Borough.</u> ”	Minor positive. The modification seeks to ensure that re-provided facilities are located on-site or in the borough.
MM44	Para 4.55	Retaining valued cultural and leisure facilities The Council will seek to retain cultural and leisure facilities taking into account their value to the community including protected groups. In assessing planning applications, we will consider the effects of the proposal on both the local area and the wider borough and whether the loss of a use would be detrimental to the range of leisure and cultural facilities, including specific cultural and leisure activities (e.g. live music), where appropriate. <u>We will also consider whether the scheme would be detrimental to health and well-being through the loss of facilities which provide meeting spaces for the community.</u> We will take into account any planned new facilities which may address a shortfall in provision.	Minor positive. Amendments add consideration to health and wellbeing – the impact of the loss of a facility supporting social cohesion.
MM45	Para 4.61	When a proposal would result in the loss of existing cultural or leisure uses, we will take into account the size, layout and design of the existing facility, the mix of uses in the area and proposals for the re-instatement of a cultural or leisure facility <u>on-site or elsewhere.</u>	Neutral. Replacement text provides greater clarity as to the aims of the policy without altering its approach or impact on sustainability objectives.
MM46	Policy C4	The Council will <u>seek to</u> protect public houses which are of community, heritage or townscape value. The Council will not grant planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless it is demonstrated to the Council’s satisfaction that: a. the proposal would not result in the loss of pubs which are valued by the community (including protected groups) <u>unless there are equivalent premises available capable of meeting the community’s needs served by</u>	Neutral. Replacement text provides greater clarity as to the aims of the policy without altering its approach or impact on sustainability objectives.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>the public house are available; or b. equivalent premises capable of meeting the community needs served by the public house are available <u>there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises in the next 5 years over the medium term.</u> c. there is no interest in the continued use of the property or site as a public house; d. there is no reasonable prospect of a public house being able to trade from the premises in the next 5 years.</p>	
MM47	Para 4.79	<p>Delete text 4.79 There are many instances in London of a struggling pub being turned around by new operating models and management. This includes pubs being run as a community social enterprises. The Council will require applicants to demonstrate to the Council's satisfaction there is no reasonable prospect of the pub being able to trade from the existing premises in the medium term (ie the next five years)-[...]</p>	Neutral. The modification will have no significant effect on the sustainability impact of the Plan
Economy and jobs			
MM48	Policy E1	<p>Criterion g. iii. safeguarding the <u>Kentish Town</u> borough's main Industry Area;</p>	Neutral. The modification will have no significant effect on the sustainability impact of the Plan.
MM49	Para 5.32	<p>In response to the factors above, the Council will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use and to safeguard the identified <u>Kentish Town</u> Industry Area. <u>This is a large area with a mix of industrial uses and no housing, making it particularly suited for continued employment use (see also paragraph 5.44).</u></p>	Minor positive. Additional text further reinforces the importance of the Kentish Town Industry Area as a centre for employment based uses.
MM50	Policy E2	<p>e. it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy <u>and will be to a sustainable location;</u></p>	Minor positive. Additional text provides greater clarity as to the aims of the policy (aligning with supporting text) and highlights the need for the businesses to be located in

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
			sustainable locations.
MM51	Policy E2	“Where proposals in Hatton Garden would increase total gross internal floorspace by more than 200 sq m, we will seek to negotiate up to 50% of the additional floorspace as affordable premises suitable for the jewellery sector.”	Minor positive. Further clarification on what should be delivered which supports the jewellery sector.
MM52	Para 5.41	Where premises or sites are suitable for continued business use, the Council will consider higher intensity redevelopment schemes which improve functional efficiency, maintain or, preferably, increase the amount of employment floorspace and number of jobs and provide other priority uses, such as housing (and, in particular, affordable housing), community facilities and open space, where this would not prejudice the continued operation of businesses on the site. The loss of a business supporting the CAZ or the local economy as part of a redevelopment scheme will only be permitted if it is demonstrated that it is possible for the existing business to be relocated to a sustainable location and that this would not cause harm to CAZ functions or Camden’s local economy. <u>(Further guidance on business uses considered to support the CAZ is set out in the Mayor of London’s Central Activities Zone Supplementary Planning Guidance). Redevelopment should retain as far as possible existing businesses that desire to remain on the site, and in particular, industrial and warehouse/logistic uses that support the functioning of the CAZ or the local economy.</u> The reprovided employment floorspace on the proposal site should be designed flexibly to be able to accommodate a range of business types and sizes, in particular small and medium sized enterprises (SMEs) and businesses in growth sectors such as the creative industries. The provision of affordable workspaces will be particularly welcomed.	Minor positive. The modifications provide further guidance on what constitutes business that support CAZ functions and they will also ensure that any redevelopment scheme considers the needs of existing businesses.
MM53	New para after 5.43	<u>5.43B Where provision of SME workspace has been agreed as part of a development, the Council will seek to secure this via the use of planning obligation. We will also seek to secure through a planning obligation an element of affordable SME workspace from large scale employment</u>	Minor positive. This additional paragraph adds further detail as to what the Council will seek to secure for affordable SME workspace which is likely to encourage new

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p><u>developments with a floorspace of 1,000 sq m or more. The cost per square foot or per workstation that would be considered affordable will vary according to a range of factors such as location, type, quality etc. Where workspace has been specified as affordable, the Council's Economic Development Team will work with developers to agree appropriate the terms of affordability on a case by case basis. The following are examples of ways in which affordability could be considered:</u></p> <ul style="list-style-type: none"> • <u>an element of the space could be provided at less than 80% of comparable market values. (However, for many sectors and locations in Camden rents will need to be lower than this to make them affordable to target occupiers.)</u> • <u>a sponsorship programme through which a number of local businesses are able to access space at reduced rents for an agreed period;</u> • <u>an average of market rents paid by tenants in the area occupying an equivalent type and quality of space.</u> <p><u>The Council will also consider alternative suggestions made by developers.</u></p>	investment and accommodate new and expanding businesses.
MM54	Para 5.44	<p>5.44 The Council will retain the Kentish Town Industry Area for industrial and warehousing uses as set out in Policy E1, by resisting any proposals that would lead to the loss of sites in Use Classes B1(b), B1(c), B2 and B8 and sui generis uses of a similar nature. Part of the Industry Area is in low density employment use. The Council will consider higher intensity redevelopment proposals for employment uses for the use classes identified within this paragraph, Any development proposals that would introduce uses that would prejudice the successful operation of businesses in the area, will be resisted. <u>Redevelopment proposals for the Industry Area will be assessed in accordance with Policy E2.</u></p>	Neutral. The modification will have no significant effect on the sustainability impact of the Plan.
MM55	Para 5.50	<p>"Where redevelopment proposals would increase total gross floorspace by more than 200 sq m, we will seek to negotiate up to 50% of the</p>	Minor positive. Further clarification on what is meant by affordable premises provides

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>additional floorspace as affordable premises suitable for the jewellery sector. <u>In such cases the Council will expect rents for the designated jewellery space to be no more than the average of market rents for B1c space in jewellery use in Hatton Garden and will seek to negotiate lower rents where possible.</u> When the provision of workspace is not possible due to the nature of the site or the development, we will seek a financial contribution towards support for the jewellery industry. The requirement to provide workspace will be determined by the supply of such space in the area. Where considered appropriate, contributions towards training and support activities for industry in Hatton Garden may be sought in lieu of workshop provision. The level of contribution will be related to the area of workspace that would otherwise have been expected.”</p>	<p>greater certainty of what should be delivered.</p>
MM56	Policy E3	<p>d) expect <u>encourage</u> large-scale tourism development and visitor accommodation to provide training and employ Camden residents;</p>	<p>Neutral. While this modification alters the degree of expectation to provide employment opportunities for local people, it is unlikely to have a negative impact on the sustainability impact of the plan.</p>
MM57	Para 5.56	<p>“The Council will guide tourism development that is likely to attract large numbers of people to Camden’s part of Central London, particularly the growth areas of King’s Cross, Euston, Holborn and Tottenham Court Road. <u>The Council will generally consider large-scale developments to be those that provide additional floorspace of 1,000 sqm of more.</u> For tourism developments in Fitzrovia please refer to the Fitzrovia Area Action Plan. Tourist attractions may also be acceptable in other parts of the borough if they have a local focus and a limited number of expected visitors. Examples of this type of attraction are the Freud Museum, near Finchley Road, and Keats’ House in Hampstead.”</p>	<p>Neutral. The modification will have no significant effect on the sustainability impact of the Plan.</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
Protecting amenity			
MM58	Policy A2	<p>a. protect all designated public and private open spaces as shown on the Policies Map and in the accompanying schedule <u>unless equivalent or better provision of open space in terms of quality and quantity is provided within the local catchment area.</u></p> <p>b. Safeguard <u>open space land greater than 400sqm</u> on housing estates while allowing flexibility for the re-configuration of land uses. When assessing development proposals on this land we will apply the following criteria <u>take the following into account:</u></p> <p>i. the effect of the proposed scheme on the size, siting and form of existing open space on the amenity value of the land and the functions it performs;</p> <p>ii. open space improvements which would benefit existing estate residents <u>whether the open space is replaced by equivalent or better provision in terms of quantity and quality;</u></p> <p>iii. wider community benefits from the re-configuration of land, including the provision of affordable housing <u>whether the public value of retaining the open space is outweighed by the benefits of the development for existing estate residents and the wider community, such as improvements to the quality and access of the open space, or the provision of affordable housing.</u></p>	Minor positive. The proposed alterations will seek to ensure the protection and possible enhancement of un-designated open space on housing estates.
MM59	Policy A2	f) conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas <u>or to the setting of heritage assets.</u>	Minor positive. Added text provides greater emphasis on the significance of heritage assets.
MM60	Policy A2	Insert new criterion after criterion (h) "x. consider development for alternative sports and recreation provision."	Minor positive. The modification allows for the alternative provision of sports and

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		where the needs outweigh the loss and where this is supported by an up-to-date needs assessment.”	recreation uses where there is a recognised need.
MM61	Policy A2	m) give priority to securing new public open space on site, with provision off site near to the development only considered acceptable where provision on site is not achievable. If there is no realistic means of direct provision, the Council will <u>may</u> accept a financial contribution in lieu of provision	Neutral. The modification does not substantially change the Plan’s approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM62	Para. 6.32	Additional text on to end of para. 6.32: <u>The loss of an open space will only be acceptable where provision of equivalent or better space is made within an appropriate catchment area for the type of open space. Catchment distances are set out in Camden Planning Guidance 6.</u>	Minor positive. The additional text provides greater certainty that replacement open space will be provided within the local area.
MM63	Para. 6.33	Camden has many large housing estates with extensive areas of amenity land. This has generally not been formally designated as open space but constitutes a potential resource for providing enhanced public or communal space. The Council will continue to retain suitable land, whilst providing the flexibility for various land uses to be re-configured across the estate. The Council wishes to protect this land, while allowing for the reconfiguration of open space and other land uses across estates where significant public benefits have been demonstrated (for example provision of new homes, schools and other community benefits), in particular for residents of the estate. The Council will consider whether such schemes provide equivalent or better provision in terms of the quality and quantity of usable open space and secure improvements to the accessibility and range of uses. This can bring enhancements where land set within housing estates is of poor quality, badly arranged or offers limited value in terms of open space functions for which it can used.	Neutral. The modification does not substantially change the Plan’s approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM64	Para 6.37	Include additional text 6.37 Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area. <u>The Council will protect such spaces in accordance with paragraph 74 of the</u>	Neutral. The modifications will have no significant effect on the sustainability impact of the Plan.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p><u>National Planning Policy Framework.</u> Gardens help shape their local area, provide a setting for buildings, provide visual interest and may support natural habitats. Therefore they can be an important element in the character and identity of an area (its 'sense of place'). We will resist development that occupies an excessive part of the garden, and where there is a the loss of garden space which contributes to the character of the townscape. Part of the established character of these spaces may also be defined through features such as railings and garden walls. We will seek the retention of these features where they make a positive contribution to townscape value."</p>	
MM65	New para. 6.41A	<p>Include an additional paragraph</p> <p><u>The Council recognises that the need for sports and recreation provision can change over time. The Council will consider proposals for alternative provision of such uses where a need has been demonstrated to its satisfaction and this need outweighs the loss of the existing provision. The proposal will also be assessed taking into account its impact on the integrity on the open space and against other relevant policies.</u></p>	Minor positive. The modification allows for the alternative provision of sports and recreation uses where there is a recognised need.
MM66	Para 6.45	<p>Replace paragraph 6.45 with:</p> <p><u>The Council will seek Section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing open spaces is met. In some cases the Community Infrastructure Levy will be used to provide funding for open space improvements identified by the Council on the CIL Funding List. Where the Council negotiates a planning obligation, we will apply the standards set out in criterion I. Planning obligations will not be sought for open space projects which are included in the CIL Funding List. In addition, the Council recognises that the pooling of planning obligations is limited to a maximum of five section 106 agreements per infrastructure project or type of infrastructure. The Council will also not seek contributions for community infrastructure and services open space from small scale and</u></p>	Neutral. The modifications will have no significant effect on the sustainability impact of the Plan.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		self-build developments in line with the circumstances set out in the <u>National Planning Practice Guidance.</u> "	
MM67	Policy A5	<p>The Council will require applicants to demonstrate that proposals for basements:</p> <p><u>"n. do not harm neighbouring properties, including requiring the provision of a basement impact assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight' maintain the structural stability of the building and neighbouring properties;</u></p> <p>...</p> <p>p. do not harm the structural stability of the host building, neighbouring buildings or the water environment in the local area;"</p> <p>renumber subsequent criteria.</p>	Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.
MM68	New para after 6.118	<p>Add a new section after Basement Impact Assessments</p> <p><u>Burland Scale</u></p> <p><u>Where a BIA identifies risk of damage to properties by subsidence this risk should be described using the Burland Scale. The Burland Scale methodology has been adopted for projects internationally and has been used by the Building Research Establishment and the Institution of Structural Engineers, London. The classification system of the scale is based on the ease or repair of visible damage. Subsidence is only one element in the many potential impacts assessed in a BIA and other methods will be employed when describing these other impacts. In the Burland Scale the damage to properties caused by subsidence may be considered in three broad categories:</u></p> <ul style="list-style-type: none"> <u>• (i) visual appearance or aesthetics,</u> <u>• (ii) serviceability and function, and</u> <u>• (iii) stability.</u> <p><u>Burland Scale categories 0, 1, and 2 refer to (i) aesthetic damage, category 3 and 4 relate to (ii) serviceability and function, and 5 represents damage which relates to stability. Burland states that it is a major objective of design and construction to maintain a level of risk to buildings</u></p>	Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>no higher than category 2, where there is only risk of aesthetic damage to buildings (see Burland, J. “The assessment of the risk of damage to buildings due to tunnelling and excavations”, Imperial College London, 1995). However the Council considers that neighbouring residential properties are particularly sensitive to damage, where relatively minor internal damage to a person’s home can incur cost and considerable inconvenience to repair and redecorate. Applicants must therefore demonstrate in the basement impact assessment that the basement scheme has a risk of damage to neighbouring properties no higher than Burland Scale 1 ‘very slight’.”</p>	
Design and heritage			
MM69	Policy D2 Heritage	<p>Amend Policy D2 <u>“Designated heritage assets include Conservation Areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: Added sentence under the policy subheading ‘Conservation areas’ Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘Designated Heritage Assets’.</u> <u>Added sentence under the policy subheading ‘Listed buildings’ Listed Buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘Designated Heritage Assets’.</u> <u>Add sentence under policy sub heading ‘Archaeology’ The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate</u></p>	Minor positive. The additions will ensure that the level of protection measures is appropriate to the value of the heritage asset.
MM70	Para 7.41	Amend text at para 7.41	Neutral. The modifications will have no significant effect on the sustainability impact

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>“The Council places great importance on preserving the historic environment. Under the Listed Buildings and Conservation Areas act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a matter appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings”.</p>	of the Plan.
MM71	Para 7.42	<p>Amend Para 7.42</p> <p>“The Council has a proactive approach to conserving heritage assets. In addition to the application of Local Plan policies the Council protects the historic environment through the following areas of work:</p> <ul style="list-style-type: none"> • Conservation Area Management Strategies: The Council works with the Conservation Area Advisory Committees to update <u>and support the implementation</u> of strategies. • Heritage at Risk: The Council identifies buildings and structure at risk and proactively <u>seeks to conserve</u> seeks their preservation <u>and where required bring back into viable use</u>, including identifying sources of funding. • Local list of undesignated heritage assets: The Council introduced the local list in 2015 and it will be updated annually. • Guidance: The Council has adopted detailed guidance for the preservation of heritage assets in the supplementary planning document Camden Planning Guidance 1: Design, and Retrofitting Planning Guidance (for sustainability measures in historic buildings). The Council updates planning guidance as required. • Area based work: Preservation <u>and enhancement</u> of the historic environment is a key objective of area action plans and the Site Allocations. The Fitzrovia Area Action Plan for example sets 	Minor positive. The additions will ensure that the level of protection measures is appropriate to the value of the heritage asset.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>principles for developing key sites which retain and enhance the setting of listed buildings.</p> <p><u>The Council recognises that development can make a positive contribution to, or better reveal the significance of, heritage assets and will encourage this where appropriate. Sensitive consideration of heritage assets can greatly enhance development schemes (for example, King's Cross Central).</u></p>	
Sustainability and climate change			
MM72	Policy CC2	<p>Amend criterion g) of Policy CC2</p> <p>expecting <u>encouraging</u> developments (conversions and extensions) of 500 sqm of residential floorspace or above or five or more dwellings to achieve Excellent in BREEAM domestic refurbishment</p>	Minor negative. The modification may make it harder to meet our overall carbon reduction targets in residential developments
MM73	Para 8.47	<p>Amend Para</p> <p>“BREEAM (Building Research Establishment Environmental Assessment Method) applies to non-residential developments and residential development arising from conversions and changes of use. This an assessment method is a tool that enables the Council us to assess the environmental sustainability of development.</p>	Minor negative. The modification may make it harder to meet our overall carbon reduction targets in residential developments
MM74	Par 8.49	<p>The Council has been successfully applying a minimum of Very Good BREEAM domestic refurbishment. The sustainability of residential development arising from conversions, extensions and changes of use can be assessed through the use of BREEAM domestic refurbishment. We will expect encourage developments of five or more dwellings or 500 sqm of residential floorspace or above resulting from (including conversions, extensions and changes of use) to achieve an Excellent rating in BREEAM domestic refurbishment.</p>	Minor negative. The modification may make it harder to meet our overall carbon reduction targets in residential developments
MM75	Para 8.50	<p>The Council will expect the application of a BREEAM assessment to Non-residential developments (including conversions, extensions and changes of use) of 500 sqm or more. We will expect these to shall</p>	Neutral. The modifications do not substantially change the Plan's approach and therefore will have no significant effect

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		achieve a BREEAM rating of Excellent from 2016 and will encourage zero carbon from 2019.	on the sustainability impact of the Plan
MM76	Policy CC3 part (f), and paragraph 8.71	<p>“The Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible.</p> <p>We will require development to:...</p> <p>f. not locate vulnerable development (such as basement dwellings) in flood-prone areas.”</p> <p><u>Paragraph 8.71</u> “Basements can affect the ability of the ground to absorb rain when soil is replaced by an impervious structure and can be particularly susceptible to flooding. In such cases the use of basements may be restricted to non-habitable uses. <u>The Council will not permit basement schemes which include habitable rooms and other sensitive uses for self-contained basement flats and other underground structures in areas prone to flooding (Policy A5 Basements).</u> The Council shall require all new basement developments whether domestic or non-domestic to conduct a Basement Impact Assessment (please see Policy A5 Basements) which considers both groundwater and surface water flooding. A Basement Impact Assessment (BIA) should demonstrate that the impacts of the proposed development are acceptable, or that appropriate mitigation measures will be adopted.”</p>	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.
MM77	Para 8.69	<p>“Camden’s Strategic Flood Risk Assessment includes information as to the suitability of SuDS in the borough and this should be used alongside other local information held by Camden and the Environment Agency. Where appropriate, SuDS measures will be secured by planning condition or by legal agreement. <u>The Environment Agency published in 2016 updated climate change allowances including those for peak rainfall, which should be factored into any flood risk assessments.</u>”</p>	Minor positive. This modification adds further evidence/ information likely to have an impact on future flood risk assessments in the borough.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM78	Para 8.79	<p>The Council will require Air Quality Assessments (AQA) where any of the following apply:</p> <ul style="list-style-type: none"> • major applications where occupants will be exposed to poor air quality (along a busy road, diesel railway lines or in a generally congested area); • development that has potential to significantly change road traffic on a busy road; • the development has more than 75 new residences; • commercial developments with a floorspace of 2,500 sqm or more; • developments that include biomass boilers or CHP (combined heat and power) <u>and connections to existing decentralised energy networks (whereby the increased capacity is not already covered by an existing AQA)</u>; and • substantial earthworks or demolition. 	Minor positive. Modification ensures appropriate assessment of air quality.
Town centres and shops			
MM79	Para 9.5	<p>Add before heading 'Growth Areas' :</p> <p><u>Specialist Shopping Areas</u></p> <ul style="list-style-type: none"> • <u>Covent Garden</u> • <u>Fitzrovia and south-west Bloomsbury</u> • <u>Hatton Garden</u> • <u>Museum Street</u> • <u>Denmark Street</u> 	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.
MM80	Policy TC1	<p>Amend Policy TC1</p> <p>"Neighbourhood centres, specialist shopping areas and small shops outside of centres:</p> <ul style="list-style-type: none"> • appropriate provision in Neighbourhood Centres and Camden's Specialist Shopping Areas: Covent Garden, Hatton Garden, Museum Street, Drummond Street and Denmark Street; and 	Neutral. The modifications do not substantially change the Plan's approach and therefore will have no significant effect on the sustainability

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM81	Policy TC1	<p>• limited provision of small shops outside centres to meet local needs”.</p> <p>Changes to the retail hierarchy to clarify how it works</p> <p>Sequential Approach</p> <p>The Council will apply a sequential approach to retail and other town centre uses outside of the areas listed above to support Camden’s network of centres. Retail and other town centre uses should be located in <u>designated centres according to the hierarchy above</u>. Only if suitable sites cannot be found within <u>designated centres</u> will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations.</p> <p>The Council will require a retail impact assessment for large retail development proposals (of 2,500 sqm or more) that are not in accordance with the above approach and:</p> <ul style="list-style-type: none"> • would be in an edge of centre or out of centre location; or • would be in an existing centre and have the potential to have a harmful impact on other centres. 	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.
MM82	Para 9.9	<p>Adding after paragraph 9.9:</p> <p><u>The sequential approach applies to sites outside of designated centres. The Local Plan does not require that retail development seeks sites within the designated centres in any hierarchical order, provided the development meets the policy objectives for each centre as described in the policy. For example, there is no need for retail development to be directed to Growth Areas before Town Centres, or to Town Centres before Central London Frontages.</u></p> <p><u>For the Central London Specialist shopping Areas of Covent Garden, Fitzrovia and south-west Bloomsbury, Hatton Garden, and Museum Street, sites should be sought within the designated frontages, not the wider boundary. Proposals for new retail development within these areas that are not within the designated frontage will be considered to be in an</u></p>	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.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<u>out of centre location.</u>	
MM83	Policy TC2	Insert after criterion g. <u>“x: the Council’s expectations for the mix and balance of uses within frontages for each designated centre are set out in Appendix 3.”</u>	Minor positive. The modification sets out the expectations of mix of units within the plan clearly.
MM84	Para 9.16	Amend Paragraph in line with Policy amendment. Protecting and enhancing the role and character of Camden’s centres 9.16 The Council will protect and enhance the role and character of each of Camden’s centres by assessing proposals against this policy and the centre specific guidance set out in <u>Appendix 3</u> and the supplementary planning document Camden Planning Guidance 5: Town Centres, Retail and Employment. Camden Planning Guidance 5 Appendix 3 sets out the mix of uses that the Council expects on primary and secondary frontages, including: <ul style="list-style-type: none"> • the minimum proportions of shops (A1 use); and • the maximum proportions of food, drink and entertainment uses (A3, A4, A5 uses). 	Minor positive. The modification sets out the expectations of mix of units within the plan clearly
MM85	Policy TC4	Add new criterion after criterion c and renumber subsequent paragraphs: <u>x: the Council’s expectations for the mix and balance of uses within frontages for each centre are set out in Appendix 3.”</u>	Minor positive. The modification sets out the expectations of mix of units within the plan clearly.
MM86	Policy TC4 and para 9.47	Amend Policy TC4 and supporting text “Betting shops, payday loan shops and pawnbrokers “e. whether development results in a proliferation of payday loan stores, betting shops, or pawnbrokers [...] Betting shops, payday loan shops and pawnbrokers To prevent the proliferation of betting shops, payday loan stores and pawnbrokers which harm the vitality and viability of our centres, the Council will generally resist schemes which result in more than one betting shop, payday loan store, or pawnbroker within 400m distance of the same use.”	Neutral: The plan will have less power to control these uses which could cause harm to the vitality and viability of town centres, however this risk has been mitigated by an undertaking to monitor these uses in case there is a need to introduce controls in future.

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>Para 9.47 The number of betting shops, payday loan stores and pawnbrokers has increased in Camden in recent years. Some centres have areas where a number of these uses are concentrated, including the south end of Camden Town and parts of Kilburn High Road (including properties in Brent). The Council considers that <u>a the proliferation of such use is damaging these uses could damage</u> the character, <u>vitality and viability</u> of town centres. The Council will therefore monitor the number and impact of betting shops, payday loan stores, and pawnbrokers over the plan period and consider whether evidence shows there is a need to introduce limits on such uses in the future.</p>	
MM87		<p>TC4 “f. the health impacts of development, including generally resisting development of hot food take aways within 400m of secondary schools;”</p> <p>“Health impacts Hot food takeaways 9.44 <u>In line with the National Planning Policy Framework the Council believes that the planning system can play an important role in facilitating healthy communities. One issue of particular importance in the borough is childhood obesity and</u> the Council seeks to tackle childhood obesity <u>this issue</u> and encourage healthy eating habits, particularly among young people. The Council is undertaking a range of programmes aimed at improving the food environment in the borough. While the causes of obesity are complex there is evidence to support that energy dense fast food is one of a number of contributing factors to obesity. <u>The Council will therefore consider the health impacts of the development of new hot food take aways in the borough. Resisting the proliferation of hot food takeaways close to secondary schools is one of a number of strategies to reduce child obesity and encourage healthy eating.</u>”</p>	<p>Minor negative: the modifications will have less power to control development of hot food take aways near to secondary schools which may have a minor negative impact on childhood obesity. However, policy TC4 criterion f retains the ability for the Council to consider the health impact of town centre development.</p>
<p>Transport</p>			

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
MM88	Policy T1	<p>Include additional text in Policy T1</p> <p>“In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to the bus network <u>infrastructure</u> including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. <u>Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.</u>”</p>	<p>Minor positive. This modification will likely ensure that development which increases pressure on existing services provides contributions towards improvements. Thus continuing to reduce reliance on private transport.</p>
MM89	Para 10.12	<p>In partnership with Transport for London, which manages the bus-public transport network across London, the Council will ensure that Camden’s growth is matched by improvements to bus services-public transport through planning obligations. <u>It is expected that the majority of contributions towards public transport improvements will be sought towards bus network infrastructure (such as bus stops, shelters, passenger seating, waiting areas, signage, timetable information etc.) where the demand for bus services generated by the development is likely to exceed existing capacity (assessed through Transport Assessments). The Council may also seek contributions from major developments towards other forms of public transport if an existing public transport improvement scheme is available and related to the development. Details regarding public transport contributions can be found within our supplementary planning document, Camden Planning Guidance 8: Obligations. Details regarding Transport Assessments can be found within Camden Planning Guidance 7: Transport.</u></p>	<p>Minor positive. This modification will likely ensure that development which increases pressure on existing services provides contributions towards improvements. Thus continuing to reduce reliance on private transport.</p>
MM90	Para 10.20	<p>In redevelopment schemes, the Council will consider retaining or re-providing existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed. This is common where an existing dwelling or block is being</p>	<p>Neutral. The proposed addition does not change the Plan’s approach to car parking in the borough and therefore will have no significant effect on the sustainability impact</p>

Mod Ref.	Policy/ paragraph no.	Main Modification	Sustainability Appraisal implications
		<p>extended or subdivided. It can also occur where a change of use brings a site or property into residential occupation. If a development is to have new occupiers, this should be car-free. <u>Where redevelopment involves a town centre car park identified in Camden's Site Allocations Plan as supporting the functioning of the town centre, the Council will consider the retention of the existing parking provision or a lower level of provision on-site. Any new development on the existing car park should be car free in accordance with Policy T2.</u></p>	<p>of the Plan.</p>
Appendices			
MM91	NEW	Add new Appendix 3 'Frontage controls'	Minor positive. The modification sets out the expectations of mix of units within the plan clearly
MM92	NEW	Add new Appendix 4 'Housing trajectory'	Neutral. The modification does not substantially change the Plan's approach and therefore will have no significant effect on the sustainability impact of the Plan.

Appendix 2: SA assessment of main modifications to the Camden Local Plan

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
		Introduction																	
MM01	p. 7	Additional text to paragraph 1.4. Camden Sites Allocation – this identifies known development sites in Camden’s main growth area and other locations across the borough and sets out the Council’s expectations for them. It was adopted by the Council in 2013 and will be fully reviewed following adoption of the Local Plan.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
		Growth and spatial strategy																	
MM02	p. 25	Kings Cross (Para 2.26 bullet 7) “Protect and enhance features <u>and assets</u> of historic and conservation importance;”	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
MM03	p.27	Tottenham Court Road (para 2.29 bullet point 4) Development of the highest quality as befits this historic area in the heart of London, which preserves local amenity and seeks to enhance and conserve preserve the significance of	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
		heritage assets such as the character and appearance of conservation areas;																	
MM04	p.28	Holborn (para 2.31 bullet point 11) High quality, sustainable design that's respects its surroundings and <u>conserves</u> preserves and enhances the area's <u>heritage assets and wider</u> historic environment; and	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
		Meeting housing needs																	
MM05	p. 43	Insert a new paragraph 3.5A after paragraph 3.5 to define self-contained housing and clarify the operation of the housing target and priority land-use in Policy H1.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM06	p. 44 - 45	Amend paragraphs 3.8 to 3.10 to correct the Plan period, refer to the updated housing trajectory, refer to the NPPF requirements for a five year housing supply with a buffer, incorporate the housing supply figures from the updated trajectory, and indicate the housing supply figures will be updated through the AMR.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM07	P46	Amend Para 3.16 to add a cross reference to para 3.5A and the definition of self contained homes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
		and the references to multi adult households																	
MM08	P53	Amend Policy H2 to clarify the distinction between the policy approach to the specified areas and the rest of the borough, and clarify the distinction between the circumstances where the inclusion of housing is not required.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM09 MM10 MM11 MM12 MM13	P54 - 55	Amend paragraphs 3.43 to 3.63 to clarify the distinction between the policy approach to the specified areas and the rest of the borough, clarify the distinction between the circumstances where the inclusion of housing is not required, provide for the Knowledge Quarter to be considered when balancing the priority given to self-contained housing against other priorities, and acknowledge that operational transport development may prevent the inclusion of housing as part of a mix of uses	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM14	P64	Update the strategic affordable housing target in Policy H4 in the light of the latest rounded delivery estimates, and to correct an error in the Local	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
		Plan base-date																	
MM15	P64	Clarify the operation of the affordable housing threshold in Policy H4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM16	P64	Delete requirements Policy H4 relating to accommodation for travellers that may not be necessary or deliverable.	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0
MM17	P67	Insert references to Camden Policy Guidance CPG2 and emerging GLA guidance in paragraph 3.88, and remove references to dwelling size and the Camden Affordable Rent Study 2011	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM18 MM19	p. 67	Amend paragraph 3.89 and 3.90 to reflect the current status of the Housing and Planning Act and remove assumptions about how Starter Homes requirements would apply in Camden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM20	p. 67	Amend paragraph 3.93 to update strategic affordable housing target and indicate that it has been informed by a delivery estimate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM21	p.68	Amend paragraphs 3.95 to 3.96 to provide greater clarity regarding the operation of Policy H4, update information about the national affordable housing threshold and clarify the operation of the proposed Local Plan affordable housing threshold	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM22	P70-71	Amend paragraphs 3.104 to 3.105 to clarify the operation of the proposed Local Plan affordable housing threshold and sliding scale	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM23	71	Delete paragraph 3.107 to remove an out-of-date reference to the national affordable housing threshold, and an out-of-date justification for the sliding scale.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM24	p. 73	Delete paragraphs 3.115 – 3.116 relating to requirements for accommodation for travellers that may not be necessary or deliverable	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0
MM25	p. 80	Delete former Policy H6 clause (d) to remove reference to partial compliance with optional accessibility requirements, amend former clauses	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
		(a) to (c) to give greater clarity regarding the application of optional standards, and add a new paragraph H6(a) to encourage design of all homes to enhance accessibility as far as possible.																	
MM26	p. 80	Amend Policy H6 text to delete requirements relating to accommodation for travellers that may not be necessary or deliverable	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0
MM27	p. 81	Add a new paragraph after paragraph 3.138 to explain new criterion (a) in Policy H6 encouraging the design of all homes to enhance accessibility as far as possible, and explain its relationship with more specific requirements for self-contained homes.	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM28	p. 83	Amend para 3.149 and 3.151 to remove reference to partial compliance with optional standards and clarify the application of requirements for "accessible and adaptable dwellings", "wheelchair adaptable" dwellings and "wheelchair accessible" dwellings.	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM29 MM30	p. 85	Amend paragraph 3.161 and 3.162 to reflect the current status of the Housing and Planning Act and remove assumptions about how Starter Homes requirements would apply in Camden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM31	p. 90	Delete paragraphs 3.179 and 3.180 and the associated sub-heading to remove requirements relating to accommodation for travellers that may not be necessary or deliverable.	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0
MM32	p. 110	Amend paragraph 3.242 to refer to the updated housing trajectory, and reflect the student housing likely to come forward on key sites in the housing trajectory	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM33	p. 123	Amend Policy H11 to delete reference to minimum targets that do not arise from the Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0
MM34	p. 124	Amend Policy H11 to delete requirements relating to accommodation for travellers that may not be necessary or deliverable.	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources	
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16	
MM35	p. 124	Amend para 3.286 and 3.287 to remove reference to a range of pitch needs	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM36	P125	Amend paragraph 3.291 to remove reference to a range of pitch needs	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM37	P126	Delete paragraphs 3.295, 3.296 and 3.297 to remove requirements relating to accommodation for travellers that may not be necessary or deliverable	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	
Community, health and wellbeing																				
MM38	p. 138	Policy C2 a) Delete existing text and replace with: <u>The Council will seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments. In some specific cases, the Council will identify and fund improvements to community facilities using receipts from the Community Infrastructure Levy.</u>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM39	p. 139	Include additional text in policy C2 “g (i) a replacement facility of a similar nature is	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
		provided that meets the needs of the local population or its current, or intended, users”																	
MM40	p. 139 - 140	Paragraph 4.26 to be split into two paragraphs with amended wording to fully accord with the operation of the CIL system and government policy on contributions:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM41	p. 144	Amend text at para 4.44 to provide clarity on the circumstances in which the Council will encourage affordable housing as an alternative to a community use	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM42	p. 147	Amend Policy C3 to provide clarity that the policy is intended to protect all cultural and leisure facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM43	p. 147	Insert additional text into fourth paragraph of policy C3 To provide clarity that the re-provision of a cultural or leisure facility may be appropriate either on-site or elsewhere in the Borough	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM44	p. 148	Amend para 4.55 to make policy approach clear	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
MM45	p. 149	Amend Para 4.61 to provide clarity that the re-provision of a cultural or leisure facility may be appropriate either on-site or elsewhere in the	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources	
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16	
		Borough																		
MM46	p. 152 - 153	Amend Policy C4 to clarify approach regarding public houses and alternative premises	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM47	P154	Delete text relating to 5 year time frame reference.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Economy and jobs																				
MM48	p. 166	Policy E1 Criterion g. iii. safeguarding the <u>Kentish Town</u> borough's main Industry Area;	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM49	p. 171 - 172	Amend Para 5.32 to provide further clarity regarding the name of the Industry Area and its function	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	
MM50	p. 173	Amend Policy E2 wording of part e) to align the wording E2 criteria e. and d. with the supporting text accordance	0	0	0	0	+	0	0	0	0	+	0	0	0	0	0	0	0	

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
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MM51	P173	Amend wording of policy E2 to provide clarity to the requirements of the policy in relation to Hatton garden.	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0
MM52	p. 175	Amend wording of para 5.4.1 To align the wording E2 criteria e. and d. with the supporting text and refer to reference to guidance produced by the Mayor which includes a definition of 'businesses which support the functioning of the CAZ or the local economy	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0
MM53	p. 176	Add an additional para after 5.43 to set out the trigger points for seeking affordable managed work space.	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0
MM54	p. 176	Amend para 5.44 to confirm that policy E2 applies to the Industry Area	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM55	p. 177	Amend para 5.50 to provide clarity on the definition of 'affordable premises'.	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0
MM56	p. 178	Amend Policy text E3 text for clarity..	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM57	p.	Amend Paragraph 5.56 to provide clarity on what the council considered ' large scale	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources	
Mod Ref.	Page no.	Summary of Main Modification	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7i	SA 7ii	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16	
	179	developments' .																		
Protecting amenity																				
MM58	p. 189	Amend Policy A2 wording to provide greater consistency with paragraph 74 of the NPPF with regard to how the Council protects designated open spaces	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM59	p. 189	Amend Policy A2 to provide clarity regarding setting of heritage assets	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	
MM60	p. 189	Include an additional criteria to Policy A2 in relation to alternative sports and recreation provision, to provide greater consistency with paragraph 74 of the NPPF with regard to how the Council protects designated open spaces	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM61	p. 190	Amend wording of Policy A2 part m) to provide clarity regarding financial contributions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM62	p. 190	Additional text on to end of Para. 6.32 to provide clarity and greater consistency with paragraph 74 of the NPPF relating to catchment areas	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
MM63	p. 190	Provide additional text to Para 6.33 to provide clarity in relation to large housing estates with extensive areas of amenity land.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

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MM64	P190	Amend Para 6.37 in relation to gardens to provide clarity.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM65	p. 193	Include an additional Para 6.41a in relation to sports and recreation provision and provide consistency with paragraph 74 of the NPPF.	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM66	p. 193 - 194	Amend text of para 6.45 to fully accord with the operation of the CIL system and government policy on contributions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM67	p. 212	Amend Policy A5 to include additional detail on the Burland Scale and remove reference to structural stability	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM68	p. 214	Add a new para after 6.118 explaining the Burland Scale	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Design and heritage																			
MM69	P234	Amend Policy D2 to clarify heritage assets	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
MM70	p. 232	Amend Para 7.41 relating to significance of heritage assets.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM71	p. 235	Amend Para 7.42 relating to positive contribution role of heritage assets	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
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		Sustainability and climate change																	
MM72	P258	Amend Policy CC2 criterion relating to BREEAM assessment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-
MM73 MM74 MM75	P260	Amendments to supporting text relating to BREEAM assessments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-
MM75	P260	Amendments to supporting text relating to BREEAM assessments in non residential buildings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM76	p. 263 . 268	Amend Policy CC3 relating to basements and water and flooding and supporting text at Paragraph 8.71	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM77	p. 268	Amend Paragraph 8.69 to include reference to Environment Agency publication	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0
MM78	p. 270	Amendment to Paragraph 8.79 relating to air quality assessments and decentralised energy networks.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
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		Town centres and shops																	
MM79	p. 276	Add a title before Paragraph 9.5 relating to Specialist shopping areas and listing them.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM80	P277	Delete policy text as within the supporting text	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM81	p. 277	Policy TC1 - Changes to the retail hierarchy to clarify how it works	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM82	p. 278	Clarifying the sequential approach in supporting text	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM83 MM84 MM85	p. 281	Amending Policy TC2 and TC4 text and supporting text to include frontage controls within the plan.	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM86	P287	Amend Policy TC4 and supporting text 9.47 regarding payday loan, betting shops or pawn brokers	0	0	-	?	0	0	0	0	0	0	0	0	0	0	0	0	0
MM87	P287	Amendments to Policy TC4 and supporting text 9.44 relating to hot food takeaways	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Housing	Healthy communities	Community facilities	Poverty	Economic growth	Sustainable communities	Design and heritage	Design and heritage	Vacant land	Transport	Amenity	Water	Biodiversity	Waste	Air quality	Energy	Non-renewable resources
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		Transport																	
MM88	p. 301	Amend Policy T1 text to clarify when contributions may be sought.	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0
MM89	p. 302	Amend supporting text at Para 10.12 regarding public transport contributions	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0
MM90	p. 305	Amend Para 10.20 to clarify expectations for existing town centre car parks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
		Appendices																	
MM91	NEW	Add new Appendix 3 'Frontage controls'	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM92	NEW	Add new Appendix 4 'Housing trajectory'	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0