

# AECOM review of the Camden Local Plan Sustainability Appraisal (SA) Report

## 1) Introduction

AECOM is commissioned to act as a 'critical friend' in support of the Sustainability Appraisal (SA) process being undertaken alongside the preparation of the new Camden Local Plan.

Specifically, whilst the SA process is being led by London Borough of Camden (LBC) Officers, AECOM has worked with Officers to ensure a robust SA process in line with legislative requirements and established good practice.

This report presents a review of the SA Report that is the key outcome of the SA process. Specifically, Regulation 19 of the Local Planning Regulations sets out that the SA Report must be published alongside the proposed submission version of the Local Plan in order to inform representations and subsequent plan finalisation.

The key question at the heart of this critical friend review is whether the SA Report presents:<sup>1</sup>

- An appraisal of “the plan and reasonable alternatives”; and
- An outline of the reasons for selecting the alternatives dealt with.

In order to explore this key question, this review is structured as follows:

- Section 2 – considers work to define, appraise and feed-back on reasonable alternatives.
- Section 3 – considers work to appraise the Local Plan.
- Section 4 – presents overall conclusions and also presents a regulatory checklist.

## 2) Reasonable alternatives

As well as presenting an appraisal of reasonable alternatives (RAs), there is a requirement to explain the RAs (in “outline” terms) and explain the influence of the appraisal, i.e. how the appraisal fed into work to prepare the Local Plan. Two further considerations are:

- Defining / explaining RAs – the requirement is to define RAs taking into account “the objectives and geographical scope of the plan”, and there is also a need to define RAs with a view to an appraisal that will then be able to reach meaningful conclusions on ‘significant effects’, where significance is defined in the context of the plan as a whole.
- Explaining the influence of the appraisal – this relates to NPPF paragraph 36, which states that, in order to be sound, local plans must be “*Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*”

## Defining RAs

As per work at the Regulation 18 stage in 2024 (as reported in the Interim SA Report published at that time, which was prepared by AECOM), a primary focus is on defining RAs in the form of ‘growth scenarios’. These essentially amount to alternative approaches to the supply of land for development, including by allocating sites (NPPF paragraph 72), in order to provide for development needs and support the achievement of wider plan objectives.

AECOM supports a focus on RA growth scenarios (as previously explained in Section 4 of the Interim SA Report, 2024) because it guarantees a focus on RAs that go to the heart of the Local Plan and for which meaningful conclusions can be reached on differential significant effects.

---

<sup>1</sup> Regulations 12(2) and 12(3) of the Environmental Assessment of Plans and Programmes Regulations (known as the SEA Regulations) set out the information that must be contained within the SA Report.

Section 4.1 of the SA Report explains the process undertaken to define RA growth scenarios. This process was ‘designed’ and first implemented at the Regulation 18 stage, and then the process was worked through ahead of the current publication stage, drawing upon latest evidence and understanding, including Regulation 18 responses.

Ultimately, the process is considered robust such that the requirement to present “outline reasons” for defining the RA growth scenarios is met.

In defining RA growth scenarios the SA Report explores overarching strategic factors (in terms of quantum and spatial distribution) that could have a bearing on growth scenarios; the individual site options available; and growth options for sub-areas in Camden (in light of strategic factors and available site options). These are discussed in turn below:

- Section 4.1.1 – explores “strategic factors” with a bearing on defining growth scenarios. A key point to note is the strategic context provided by the London Plan, which sets a housing target for an additional 10,380 homes to be delivered in Camden over a ten year period from 2018/19 to 2028/29. Also, it is important to note that the imminent review of the London Plan will result in a new capacity-based housing target for Camden which, once adopted, will supersede the current target.
- Section 4.1.2 – discusses “site options” that are essentially the building blocks for growth scenarios. It can be proportionate/appropriate to appraise a short list of site options to inform selection of sites for allocation (albeit site options are not “reasonable alternatives”); however, no such work is called for in the context of the Camden Local Plan, because there are no omission sites that are realistically in contention for allocation. There is also the question of site-specific alternatives, notably in respect of density/building heights and/or use mix, but this need not be a focus of stand-alone work (but see bullet point below).
- Section 4.1.3 – draws upon the preceding two sections to consider growth scenarios for each of the Borough’s sub-areas in turn. This is a key opportunity to consider individual site allocations potentially associated with a strategic choice in respect of density/building heights and/or use mix, including with a view to boosting supply. The work completed shows little or no opportunity to deliver further development – over and above the emerging preferred approach – in North and West Camden; and that in Central and South Camden, whilst a number of development opportunities exist, particularly around Kentish Town and Camley Street, it is very difficult to see how supply (housing and/or employment land) could be further increased, given identified constraints.

It is important to re-emphasise that, whilst the discussion in Section 4.1.3 of the SA Report aligns with the equivalent discussion from Regulation 18, and ultimately the same emerging allocations are highlighted as associated with ‘strategic choice’, the discussion in the current SA Report is brought fully up-to-date. As part of this, there is a focus on changes made to the preferred suite of site allocations since 2024, recognising that any such change may indicate a strategic choice. However, in practice, all of the changes made to the preferred approach are considered to be strongly justified, i.e. none are associated with a clear strategic choice judged to warrant particular scrutiny.

Section 4.2 then defines the RA growth scenarios on the basis of ‘the process’ set out across the preceding sections. Specifically, the RA growth scenarios involve:

- The emerging preferred approach – which is broadly unchanged from 2024.
- A higher growth scenario – involving boosting supply from certain defined sources, recognising the strategic context of needing to leave no stone left unturned, albeit also recognising few calls for higher growth through the consultation in 2024 or subsequently.
- A lower growth scenario – there is limited strategic case for exploring lower growth, but it is nonetheless considered appropriate to do so given local constraints to growth.

These growth scenarios are unchanged from those that were previously a focus of appraisal and consultation in 2024, and no concerns were raised through the consultation on the Interim SA Report. These scenarios were considered to be ‘reasonable’ in 2024 on the basis of the process set out across Section 5 of the Interim SA Report and are considered to be reasonable at the current time on the basis of the fully updated process set out across Sections 4.1.1 to 4.1.3 of the SA Report.

Finally, there is the question of possible **wider reasonable alternatives**, i.e. reasonable alternatives beyond growth scenarios. There are two considerations:

- Site specific alternatives – the RA growth scenarios provide a forum to explore alternative approaches for select key sites, and potential alternatives for other sites are informally discussed in Section 4.1.3. There is no need for further work beyond this, and certainly no need to formally define and appraise alternatives for each and every allocation.

- Topic specific policy alternatives – in the context of local plan-making it is inherently challenging to define topic specific policy alternatives that are “reasonable” in the sense that they go to the heart of the plan (i.e. reflect the plan objectives and geographical scope) and there is confidence that subsequent appraisal will enable meaningful conclusions to be drawn regarding significant effects. However, the Interim SA Report (2024) sought to give informal consideration to topic specific policy alternatives (see Section 9) and the current SA Report (2025) goes a step further by presenting formal targeted appraisal work. Specifically, Officers and AECOM discussed topic specific policy areas potentially associated with a strategic choice, before deciding on five sets of topic specific policy alternatives for appraisal and consultation (see Appendix 3 of the SA Report).

## Appraising RAs

Section 4.3 of the SA Report appraises the **RA growth scenarios** under each element of the SA framework, with the appraisal focused on: A) predicting significant effects for each of the growth scenarios (absolute performance); and B) differentiating between the growth scenarios regardless of significant effects (relative performance).

Whilst the appraisal findings align closely with those presented in the Interim SA Report (2024), they have been reviewed and updated to take into account the responses to the consultation and engagement undertaken on the draft Local Plan, as well as further available evidence.

Attention focuses on the choice between the emerging preferred approach (Scenario 2) and the defined higher growth scenario (Scenario 3), and a headline message to come out of the appraisal is that higher growth, whilst clearly supported in terms of providing for housing needs, would generate a range of tensions with sustainability objectives. Most notably, the appraisal flags concerns with open space, historic environment and economy/employment objectives.

Finally, there is a need to also consider the work undertaken to appraise **topic specific policy alternatives**, as presented in Chapter 5 and Appendix 3 of the SA Report.

Five reasonable alternatives are considered in relation to:

- Maximising the supply of self-contained housing from mixed use schemes
- Prioritising the retention of existing buildings
- Sustainability improvements to existing buildings
- Energy use and the generation of renewable energy
- Affordable workspace

Overall, the appraisal tables are helpful in that they serve as a forum to explore some key choices, although (and as discussed) the potential to reach meaningful conclusions on differential significant effects is inherently relatively limited. Key messages to come out of the appraisal tables are potentially: A) in respect of Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) there is a clear need to balance / trade-off between ‘homes’ and ‘economy/employment’ objectives; and B) for Policy CC6 (Energy Use and the Generation of Renewable Energy) there is strong support for the preferred option (energy based metric) relative to the alternative option (Part L metric).

## The preferred approach

Focusing on the RA growth scenarios, Section 4.4 presents a summary of the alternatives appraisal, essentially highlighting that each of the scenarios is associated with pros and cons (albeit this is less the case for the low growth scenario, i.e. there is a clear case to suggest that it performs relatively poorly overall).

This summary is then followed by a clear statement from Officers explaining their reasons for supporting the preferred growth scenario, on balance, in light of the appraisal.

A key point to note is that, whilst the merits of higher growth are acknowledged in terms of supporting the achievement of housing/homes objectives, the preferred growth scenario also performs reasonably well in this regard and, furthermore, is the preferable scenario under numerous other important topic headings.

### 3) The Local Plan as a whole

Section 7 of the SA Report presents an appraisal of the current draft ('proposed submission') version of the Local Plan. Specifically, the appraisal comprises a series of narrative discussions under the SA framework, where the aim of each discussion is to arrive at conclusions on significant effects. Each narrative is structured as follows:

- Area policies and site allocations – this is an opportunity to discuss the merits of the overall growth strategy, accounting for: A) the area policies that indicate key areas for development and associated infrastructure requirements; and B) specific site allocations. The aim is to set out the likely positive and negative effects on the baseline, whilst identifying any possible tensions, and setting out how these are addressed through policy criteria.
- Topic specific policies – these mostly have positive implications for the achievement of sustainability objectives, including by helping to mitigate tensions between growth and sustainability objectives. However, it is acknowledged that some topic specific policies can also generate tension with sustainability objectives, due to issues relating to cost/viability (and, in turn, implications for bringing development forward in a timely way without a need to compromise on, for example, affordable housing delivery).
- Conclusion – matters are drawn together to reach a concise conclusion on predicted significant effects.

The appraisal conclusion draws matters together, and whilst it does not predict any negative effects, it does serve to highlight that the plan performs better under some objectives than under others (which is inevitable, in that there is always a need to accept trade-offs / strike a balance between competing objectives in the context of local plans).

There is also a discussion of cumulative effects, i.e. the effects of the Local Plan in combination with other plans (and projects). Cumulative effects of this nature do naturally feed into any draft plan appraisal (i.e. the draft plan appraisal is not undertaken blind to cumulative effects) but there is also an expectation that they are given stand-alone consideration, to ensure a strong focus on cross-border, larger-than-local and long term effects.

Finally, with regards to recommendations (for mitigating negative effects / reducing tensions or boosting the positives), the Interim SA Report at Regulation 18 did not make any formal recommendations, but did explain:

*Issues and tensions with sustainability objectives identified through the appraisal should be taken into account when updating the plan subsequent to the current consultation, alongside consultation responses received and other new/updated evidence. However, it is recognised that the appraisal above considers the merits of the plan in silos – i.e. under specific topic / objective headings in turn – whilst the Council must reach decisions on balance, accounting for the full spectrum of plan and sustainability objectives, and also from a perspective of ensuring whole plan viability. It is easy for the SA to recommend more stringent policy with a view to improving the performance of the plan in respect of any given sustainability objective, but the implication could be a need for a less stringent policy elsewhere...*

The SA Report explains that issues/tensions flagged within the Interim SA Report (read alongside consultation responses, as informed by the Interim SA Report) fed into preparation of the Proposed Submission Local Plan.

The SA Report does not present any formal outstanding recommendations at the current time but does clearly communicate how / where trade-offs are being made, with the implication being that these trade-offs could potentially be revisited as part of plan finalisation. As part of this, the SA Report highlights that certain topic specific policies could potentially be adjusted in order to achieve a better performance under certain SA objectives, albeit there would be negative implications for the achievement of certain other SA objectives.

### 4) Overall conclusion

The SA Report presents a clear and robust appraisal of the plan and reasonable alternatives, and so will serve to inform representations and, in turn, the Local Plan Examination in Public.

Additionally, the SA Report more than meets the requirement to present an outline of the reasons for selecting the alternatives dealt with; indeed, the SA process is considered to represent good practice in terms of openly / transparently grappling with key strategic choices, i.e. alternative approaches to addressing the matters at the heart of the Local Plan.

There are also some wider procedural and reporting requirements, which have all been met, as set out below.

**Table A: ‘Checklist’ of how and where (within the report) regulatory requirements are met.**

Regulatory requirement	How/where met
<b>Schedule 2 of the regulations lists the information to be provided within the SA Report</b>	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 1 (Introduction) and Chapter 2 (Sustainability context) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report.  The outcome of scoping was an ‘SA framework’, which is presented within Chapter 3.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
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;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish the ‘SA framework’.  With regards to explaining “ <i>how... considerations have been taken into account</i> ”, Chapter 4 ends with a discussion of how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Chapter 4 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Chapters 6 and 7 present an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The SA process has been iterative, with the emerging preferred approach scrutinised to identify issues / tensions with objectives, and alternative approaches formally explored, in order to inform consultation and subsequent plan-making. It is not easy to make recommendations given knock on implications; e.g. it would be easy to recommend supporting higher growth such that the plan performs better in terms of ‘homes’ objectives but there would be knock-on negative implications for wider objectives.

Regulatory requirement	How/where met
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Chapter 4 deals with ‘reasons for selecting the alternatives dealt with’, with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. It also explains ‘reasons for supporting the preferred approach’, that is, it explains how / why the preferred approach is justified in light of the alternatives (growth scenarios) appraisal.</p> <p>Chapter 2 (Methodology) discusses difficulties encountered in compiling the required information.</p>
<p>i) ... measures envisaged concerning monitoring;</p>	<p>Chapter 8 presents this information.</p>
<p>j) a non-technical summary... under the above headings</p>	<p>The Non-Technical Summary is published as a separate document.</p>
<p><b>The SA Report must be published alongside the draft plan, in-line with the following regulations</b></p>	
<p>Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>An Interim SA Report was published alongside the Draft Plan in 2024 and then fed into subsequent work, alongside consultation responses received.</p> <p>At the current time the SA Report is published in order to inform representations and plan finalisation.</p>
<p><b>The SA Report must be taken into account, alongside responses, when finalising the plan.</b></p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>As above</p>