

Sustainability Appraisal (SA) of the Camden Local Plan

Interim SA Report

November 2023



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Please note this is a draft version and will require minor updates prior to consultation, including insertion of several maps.

Prepared for:

London Borough of Camden

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging New Camden Local Plan (“the Local Plan”) being prepared by London Borough of Camden (LBC).
- 1.1.2 Once adopted, the Local Plan will set the strategy for growth and change for the borough up to 2041, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives”. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:²
- What has Plan-making / SA involved up to this point?
 - including appraisal of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim SA Report

- 1.3.1 At this current stage of the plan-making process, the Council is consulting on a first draft version of the Local Plan under Regulation 18 of the Local Planning Regulations.
- 1.3.2 This Interim SA Report is therefore published with the intention of informing the consultation and subsequent preparation of the final draft (‘proposed submission’) version of the plan.

Structure of this report

- 1.3.3 Despite this being an ‘Interim’ SA Report, as opposed to the formally required SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.3.4 Each of the three questions is answered within a discrete ‘part’ of the report.
- 1.3.5 Before answering the first question there is a need to further set the scene by setting out the scope of the plan (Section 2) and the scope of the SA (Section 3).

Commenting on this report

- 1.3.6 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under ‘next steps’.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2 The plan scope

2.1 Introduction

2.1.1 The aim of this section is to briefly introduce the context to plan preparation and the plan objectives.

2.2 Context to plan preparation

2.2.1 LBC took the decision to commence a review of the 2017 Camden Local Plan in 2022. The purpose of the review is to provide for development needs and ensure that Camden continues to have robust and up-to-date planning policies that align with the Council's priorities. Also, the review reflects paragraph 33 of the NPPF, which states that local plan reviews *"should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy..."* The importance of an up-to-date local plan was emphasised in a recent [letter](#) to all local authorities nationally written by the Government Minister with responsibility for planning.

N.B. LBC consulted on a Draft Site Allocations Local Plan in 2020 and again in 2021/22. This set out the preferred approach to allocating sites for development. However, site allocations will now be incorporated into the new 'full' Local Plan, rather than being taken forward in a separate Site Allocations Local Plan.

2.2.2 Once adopted the new Local Plan will replace the existing 2017 Camden Local Plan and the 2013 Site Allocations Local Plan. New local plans must look ahead at least 15 years from the point of plan adoption, and the new Camden Local Plan will likely be adopted in 2026, hence the plan period extends to 2041.

2.2.3 The Local Plan will set out the overarching development strategy for Camden over the period to 2041. The aim is to address the long term needs of the Borough and respond to the challenges it faces. It will realise the opportunities that exist for providing new homes and jobs alongside supporting infrastructure, whilst ensuring that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings wide-ranging benefits to the Borough and its residents.

2.2.4 As with any Local Plan, one of the key focus areas is providing for a supply of new homes and jobs in Camden to meet identified needs. Camden is one of the least affordable places to live in the country, and there is a shortage of affordable housing of all types and tenures, which is forcing people to move out of Camden, and many people who've grown up in the Borough cannot afford to stay and start a family. Equally, the Borough has a very buoyant economy, and there is a high demand for employment floorspace. Given extremely limited land available for development, it is invariably the case that there can be tensions between objectives relating to housing, employment land and other land uses. This is a key issue for the Local Plan.

2.2.5 Furthermore, in respect of providing for housing needs, there is a need to state upfront that a key aim is to implement the strategy set through the London Plan (2021). The London Plan sets Camden a ten-year target of 10,380 homes over the period 2019/20 – 2028/29 (an average of 1,038 homes per year), and also provides guidance in respect of the target number of homes for the period from 2029/30 to 2040/41.

2.2.6 Providing for the London Plan target is undoubtedly challenging in the Camden context, given available land, competing priorities (e.g. employment space) and constraints (e.g. conservation areas). Since 2017 the number of new homes being approved has fallen below the London Plan target, which has generated a 'backlog' that must now factor-in to the Local Plan. One key issue is that the London Plan target was set at a time when the Euston Area Plan was proposing delivery of up to 3,800 homes by 2031, whilst the recent [Euston Area Plan Update](#) suggests 1,300 fewer homes at a slower (and more uncertain) rate of delivery.

2.2.7 Providing for housing needs, guided by the London Plan, is crucially important. However, it is important to reiterate that the Local Plan is about more than providing for housing and other development needs. Key challenges and issues to be addressed through the Local Plan include:

- The supply and cost of housing in the Borough.
- Responding to the climate and ecological emergency.
- Adapting to demographic change and supporting families to remain in Camden.
- Creating a sustainable and inclusive economy.
- Supporting Camden's town and neighbourhood centres and enabling them to thrive.

- Tackling inequalities to ensure that everyone has the chance to succeed and no-one gets left behind.
- Promoting health and well-being and addressing health inequalities.
- Ensuring that travel becomes healthier, safer, more inclusive, more affordable and more sustainable.
- Making the Borough a safer place for all Camden's communities.
- Ensuring that new buildings and public spaces are designed to be safe, accessible, and inclusive, while respecting local context and responding to the distinctiveness of Camden's valued and special places.

2.3 Plan objectives

- 2.3.1 The Council's vision for the Borough is set out in We Make Camden, and this is taken forward for the purposes of preparing the Local Plan: *"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."*
- 2.3.2 We Make Camden sets out six ambitions for the borough: Camden is a borough where every child has the best start in life; Camden's local economy should be strong, sustainable and inclusive everyone should have a secure livelihood to support them to live a prosperous life; Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute; Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well and age well; Everyone in Camden should have a place they call home; Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to help tackle the climate emergency.
- 2.3.3 These are supported by four missions and six challenges, which aim to bring to life the Council's ambitions and help make them a reality in every community in Camden. The key missions for the Local Plan are: Young people; Food; and Estates and neighbourhoods. The key challenges for the Local Plan are: Safety; Digital; Loneliness; Housing; and the Climate emergency. The Local Plan is a key mechanism for delivering the priorities of We Make Camden, as well as wider local policy / strategy, including the: Climate Change Action Plan, Health and Wellbeing Strategy, Transport Strategy and Biodiversity Action Plan.
- 2.3.4 In light of the above, the Council has developed a series of objectives for the Local Plan:
- Ensure that development in Camden responds to the climate emergency by delivering zero carbon development, optimising resource efficiency, achieving the highest possible environmental standards, and requiring buildings and spaces to be designed and constructed to adapt to and reduce the effects of climate change.
 - Increase the supply of homes to meet existing and future needs, with an emphasis on the provision of genuinely affordable homes. Self-contained housing is the priority use of the Local Plan.
 - Make sure that development meets the needs of Camden's diverse communities and enables safe, strong, cohesive, open, resilient and multi-generational communities, to help reduce inequality and isolation in the borough, and support the provision of accessible facilities and services to meet community needs.
 - Strengthen Camden's nationally important economy and maximise opportunities for Camden's residents, businesses and voluntary sector to contribute to, and share in, the success of Camden's economy, through local procurement, business support, education, training and skills.
 - Ensure the town and neighbourhood centres are accessible and sustainable, to enhance their unique characters and support their varied roles as centres of trade, community activity, creativity, business, tourism and learning.
 - Promote high quality, inclusive and sustainably designed development which protects resident's amenity, respects the unique character and history of Camden's neighbourhoods, celebrates and reflects the diversity of Camden's communities, and enables families to remain and thrive.
 - Promote active and sustainable transport, where walking, wheeling and cycling are the safest and most convenient options; invest in public transport; and reduce reliance on private cars, to reduce air pollution and improve health and well-being.
 - Improve access to parks, green spaces and biodiversity, by protecting and enhancing existing assets and providing new green spaces and habitats.
 - Promote health and wellbeing and reduce physical and mental health inequalities through good design and place making; improving access to nature; enabling affordable healthy food choices; supporting people to lead healthy and active lifestyles; and improving access to healthcare.

3 The SA scope

3.1 Introduction

3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).

3.2 Consultation on the scope

3.2.1 The Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA Report], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were consulted on a [Scoping Report](#) in 2023.

3.3 The SA framework

3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the SA framework. The Scoping Report additionally presents supplementary ‘criteria’ alongside each of the objectives. It can be seen that the topics are ordered so as to consider the social, environmental and economic pillars of sustainability.

Table 3.1: The SA framework

Topic	Objective
Homes	Promote the provision of a range of high quality and affordable housing to meet local needs
Health	Promote a healthy community
Equality	Tackle poverty and social exclusion and promote equal opportunities
Amenity	Improve amenity by minimising the impacts associated with development
Open space	Conserve and improve open space provision
Biodiversity	Protect and enhance existing habitats and biodiversity and to seek to increase these where possible
Air quality	Improve local air quality and limit exposure
Energy and resources	Promote the efficient use of energy, water and other natural resources, throughout the life of the development
Water	Protect and manage water resources (including groundwater)
Resilience	Ensure our buildings and environment can adapt to a changing climate
Design	Promote high quality and sustainable urban design
Historic environment	Protect and enhance the historic environment
Land	Ensure new development makes efficient use of land, buildings and infrastructure
Economy and employment	Encourage and accommodate sustainable economic growth and employment opportunities
Centres	Ensure designated centres remain sustainable and adaptable for the future

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

- 4.1.1 Whilst work on the Local Plan formally begun in 2022, it was preceded by several years of work on a Site Allocations Local Plan (SALP), which included consultation on a Draft SALP alongside an Interim SA Report in 2020, and then a further consultation in 2021/22. Since 2022 the primary step that has been taken is a call for sites (2022/23), plus work was undertaken in early 2023 on SA scoping, as discussed above.
- 4.1.2 The focus here, within Part 1, is not to relay the entire backstory of the plan-making/SA process, nor to provide a comprehensive audit trail of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2023. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Section 5**
 - present an appraisal of the reasonable alternatives - see **Section 6**
 - explain the Council's reasons for selecting the preferred option - see **Section 7**
- 4.1.3 Presenting this information is in accordance with the requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

Reasonable alternatives in relation to what?

- 4.1.4 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives and geographical scope of the plan (see Section 2). As such, it was determined appropriate to focus attention on reasonable alternatives in the form of '**growth scenarios**', defined as alternative approaches to the supply of land, including by allocating sites (NPPF paragraph 68), in order to provide for development needs and the support the achievement of wider plan objectives. This focus serves to ensure:
- Alternatives that go to the very heart of the plan, ensuring that decision makers, stakeholder organisations and the public are provided with a clear mutually exclusive choice.³
 - Alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'.⁴

What are growth scenarios in practice?

- 4.1.5 The ideal can be to arrive at growth scenarios that can be mapped, i.e. alternative packages of site allocations / growth locations. However, this is inherently challenging in the context of London Boroughs such as Camden, where key decisions in respect of providing for development needs relate more to *how* sites are developed, more so than *which* sites are developed / where development occurs.
- 4.1.6 For any given site there are likely to be numerous detailed development management considerations with a bearing on the number of homes and area of employment floorspace that can be delivered (whilst also delivering on wider objectives such as around place-making). This is an inherent challenge.
- 4.1.7 The question of precisely what form growth scenarios should take is returned to within Section 5.5 in light of a process (summarised in Section 5.1) involving consideration of broad strategic factors (Section 5.2), site options (Section 5.3) and area-specific issues and options (Section 5.4).

A note on site options?

- 4.1.8 Whilst individual site options should not be equated with 'reasonable alternatives', there is detailed consideration given to individual site options below, and also within **Appendix II** of this report.

³ The requirement (Regulation 12(2) of the SEA Regulations) is simply to focus SA on "*the plan and reasonable alternatives*", which could be read as suggesting essentially alternative plans.

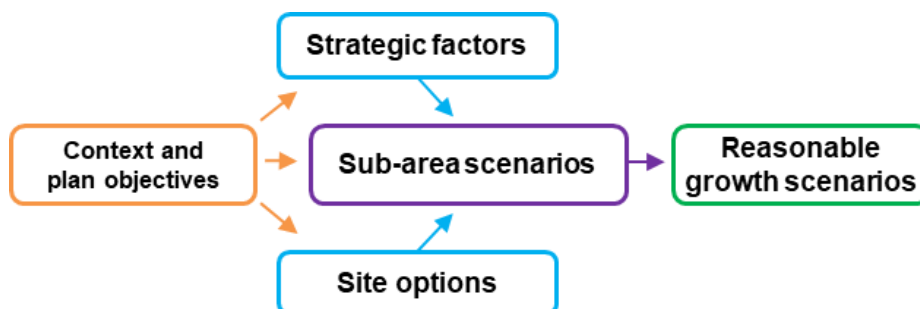
⁴ Government's PPG explains that SA "*should only focus on what is needed to assess the likely significant effects of the plan*". In turn, to be 'reasonable', alternatives must be meaningfully different to the extent that the appraisal predicts differential significant effects, where significance is defined in the context of the plan as a whole. A focus on growth scenarios guarantees that this will be the case, and so avoids the need for a 'screening' process that looks at individual policy areas and seeks to predict whether differential significant effects are likely such that appraisal is warranted. Also, it is important to bear in mind that 'no policy' is not a reasonable alternative to 'a policy'. This is because 'no policy' is the baseline (and so cannot lead to significant effects *on the baseline*, which is the definition of an effect). Also, 'no policy' is not a reasonable option for appraisal where there is a need for the policy given the plan objectives (as the plan objectives are the starting point for defining reasonable alternatives).

5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of RA growth scenarios (which are then appraised in Section 6). The figure below provides an overview.

Figure 5.1: Defining growth reasonable scenarios



5.1.2 This section of the report is structured in line with the flow diagram, namely:

- **Section 5.2** – explores factors with a bearing on growth scenarios.
- **Section 5.3** – considers individual site options, as the key ‘building blocks’.
- **Section 5.4** – explores options and growth scenarios for sub-areas.
- **Section 5.5** – draws upon the preceding sections to define reasonable growth scenarios.

5.2 Strategic factors

Introduction

5.2.1 The aim of this section of the report is to explore strategic issues and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes are needed (regardless of capacity to provide them)? Similarly, what is the need locally for employment floorspace, and of what types?
- Distribution – where within the Borough is more / less suited to growth, broadly speaking, and what types of schemes are supported (e.g. in terms of density and use mix)?

Quantum

5.2.2 Central to local plan-making is **A**) establishing development needs; and then **B**) developing a policy response to those needs. Focusing on housing, the Planning Practice Guidance (PPG) explains:

“Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure and preparing policies to address this such as site allocations.”

5.2.3 With regards to **(A)**, the NPPF (paragraph 61) explains that the starting point for local plan-making should be an assessment of housing need. However, the situation is different for London Boroughs, where the key starting point is the ‘housing target’ established by the London Plan (2021).

5.2.4 With regards to **(B)**, many local authorities will establish a housing requirement in line with the established housing need figure or, in the London context, a housing requirement in line with the London Plan target. However, under certain circumstances it can be appropriate to set a *higher* or *lower* housing requirement.

5.2.5 The London Plan ([Policy H1](#)) sets a target for Camden of 10,380 additional homes over a ten year period from **2018/19 to 2028/29**, which equates to a need to deliver a minimum of 1,038 homes per year. Within the overall target there is also a target to deliver 3,280 homes from small sites.

5.2.6 This target is clearly a key 'strategic factor' with a bearing on the definition of reasonable growth scenarios. However, there is also a need to consider the final 11 years of the plan period (**2029/30 to 2040/41**). Paragraph 4.1.11 of the London Plan explains:

"If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the [2017 SHLAA](#) findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites."

5.2.7 In other words, Paragraph 4.1.11 suggests that when planning for the period from 2029/30 it is appropriate to simply take a 'bottom up' approach driven by available capacity, as opposed to seeking to provide for any particular 'top down' target. This is important context for Camden, where capacity is very constrained.

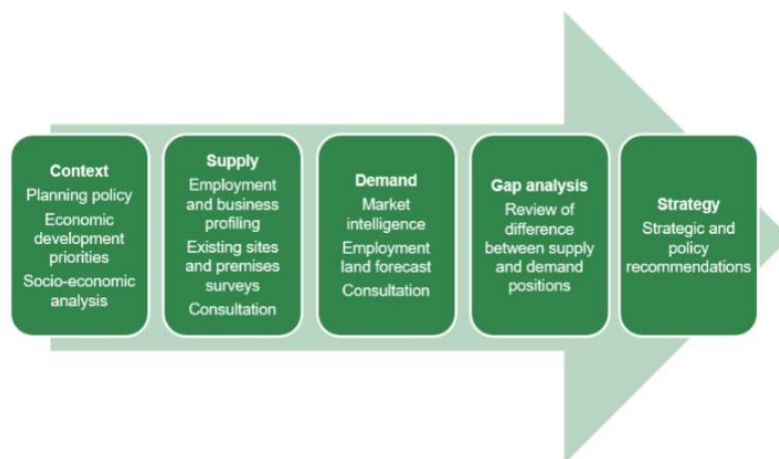
5.2.8 However, it is nonetheless important to ensure that capacity options are considered in the context of a 'top down' understanding of development needs and wider strategic factors. In this respect, it is important to note that it is fairly common for Local Plans in the London context to seek to simply roll forward the London Plan ten-year target so that it applies for the entire plan period. For example, this was the approach recently taken by Westminster, and more recently by Wandsworth, where the Inspector's Report explains:

"The plan period extends beyond the 10-year housing requirement set out by the London Plan and the [plan] carries forwards the housing requirement... to establish a housing requirement for the 15-year Plan period of 20,313 new homes. Notwithstanding this... completions... are likely to exceed this requirement within the plan period with completions likely be up to... 26,315 new homes."

5.2.9 The question of precisely what housing requirement / supply figures to reflect across the reasonable alternative growth scenarios is returned to in Section 5.5, subsequent to consideration of capacity / supply options (strategic, site-specific and sub-area specific). Box 5.1 considers employment land needs.

Box 5.1: Findings of the Employment Needs Assessment (2023)

The Employment Needs Assessment (ENA, 2023) considers: A) existing and committed supply; and B) forecast demand, before then C) considering the balance between supply and demand ('gap analysis') and making recommendations for the Local Plan. Findings of the ENA are discussed further below, but headline findings that warrant consideration here, alongside discussion of the Borough's housing target, are as follows:



- The requirement for **office floorspace** 2023-2041 is 406,359 sqm above the total existing stock. This need is primarily met through existing permissions which total 211,028 sqm office floorspace, with the remainder proposed to be met through site allocations in the Local Plan and windfall development.
- The requirement for **industrial land** 2023-2041 is 0.8 ha below the total existing stock. The ENA recommends protecting remaining industrial land given limited or no potential to add to the existing stock.

The study notably concludes: "... while it is important to protect employment land, there is also strong evidence of competition for space other than non-employment uses such as housing; employment land policies will therefore need to accommodate the Council's ambitions and objectives in these areas. This will require a flexible approach that considers the merits of each individual site and which use they are best suited for."

Distribution

Introduction

5.2.10 This is the second of two sections exploring 'strategic factors' with a bearing on the definition of reasonable alternative growth scenarios. This section gives high level consideration to:

- Broadly where in the Borough there might be opportunities to boost housing supply; and
- How sites might be developed with a view to boosting housing supply.

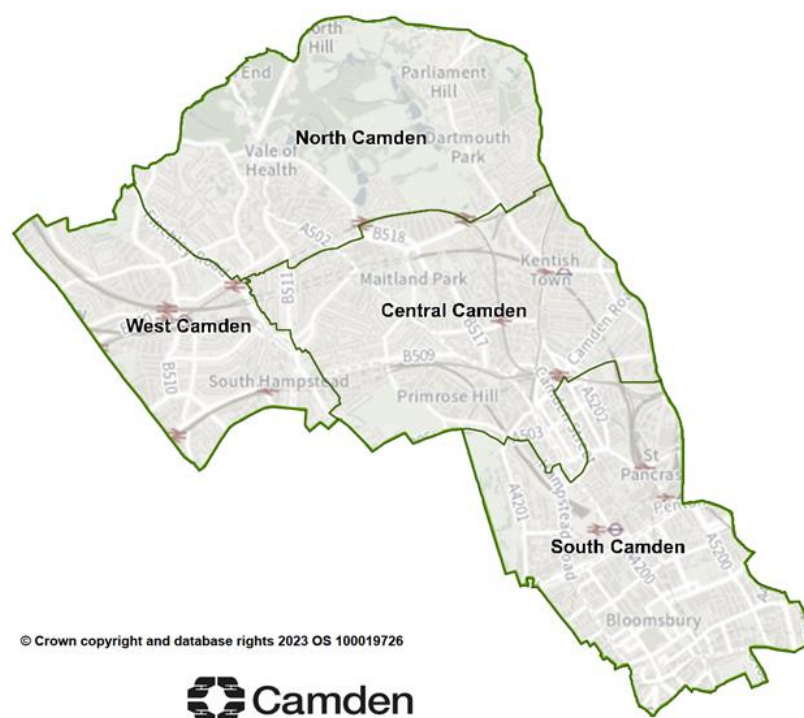
5.2.11 By way of introduction, it is also important to define the term **boosting housing supply**:

As discussed, providing for housing needs is undoubtedly highly challenging in the Camden context. The adopted Local Plan strikes a balance between providing for housing needs and supporting the achievement of wider plan objectives, and the default option for the new Local Plan is to follow a broadly similar approach, with adjustments made as appropriate. This is essentially the default approach, or baseline scenario. However, given the stretching nature of housing targets / needs, there is a need to 'think outside the box' in terms of potential options for *boosting supply* over-and-above the baseline scenario. Such options will typically have drawbacks, but they must nonetheless be considered. It is the aim of this section to begin the discussion, with issues and options then considered in further detail in subsequent sections.

Broadly where in the Borough might there be opportunities to boost housing supply?

5.2.12 The Local Plan will take an area based approach involving developing strategy and policies for four sub-areas: South Camden, Central Camden, West Camden and North Camden, as shown on the map below.

Figure 5.2: The Local Plan sub-areas



5.2.13 The reality is that attention focuses firmly on the Central and South sub-areas, as part of work to consider options for boosting housing supply. **North Camden** is subject to extensive constraints, in the form of Hampstead Heath and extensive conservation area coverage, and there is limited or no strategic growth opportunity at the one town centre in this area (Hampstead). **West Camden** is also constrained by extensive conservation area coverage, and the one strategic growth area – previously known as West Hampstead Interchange – is now permitted virtually in its entirety (notwithstanding detailed applications to be submitted), such that there is limited or no potential for the Local Plan to intervene (e.g. to boost housing supply). There are three town centres in West Camden, but none are associated with a particular growth opportunity (over-and-above that which is already permitted). Across both areas there are just a small number of available sites for redevelopment, and these are modest in size and not associated with a clear strategic choice with respect to an approach to growth, e.g. the emerging proposed approach versus higher density development.

5.2.14 With regards to the other two sub-areas:

- **Central Camden** – this area includes two key areas that must be a focus of consideration (as part of work to consider options for boosting housing supply), namely Camden Town and Kentish Town. With regards to Camden Town, there is an important cluster of development site options associated with an area known as Camden Goods Yard; however, key sites here are now permitted. With regards to Kentish Town, which includes the Industry Area, there is a need to plan for the future of two large sites known as Regis Road and the Murphy Site. Neither site has planning permission, but a clear preferred approach to redevelopment is set out in the Kentish Town Planning Framework SPD (2020), with further guidance provided in the Kentish Town Neighbourhood Plan.

- **South Camden** – this area comprises:

- Kings Cross and Euston – there is little or no potential for the Local Plan to intervene in respect of growth strategy because Kings Cross redevelopment is near complete whilst the future of Euston is being dealt with through the Euston Area Plan. It is also important to note that Kings Cross and Euston are the centre-point of the Knowledge Quarter.
- Camley Street and St Pancras Way – this is an area that must be a focus of consideration (as part of work to consider options for boosting housing supply), given a location adjacent to Kings Cross and the fact that the area includes extensive low density employment land. Sites are mostly non-permitted, although the Canalside to Camley Street SPD and the Camley Street Neighbourhood Plan were both adopted in 2021, setting out the Council's and the community's preferred approach to growth in the area.
- Central London Activities Zone (CAZ) – this is a nationally and internationally important centre of business and home to many of London's strategic assets. There is excellent transport connectivity and CAZ retail clusters at Holborn and Tottenham Court Road (which is a London Plan [Opportunity Area](#)).

Available and non-permitted development sites are limited, but there is potentially an important strategic choice here – and across the CAZ and wider Knowledge Quarter – regarding the balance between office floorspace (for which there is a high market demand) and new homes as part of development schemes. Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) from the adopted Local Plan (2017) applies in this area, and the current intention is to extend its geographical coverage through the new Local Plan, to cover the entire South Camden area.

5.2.15 Further spatial context is provided by Figure 5.3, which is the Key Diagram from the adopted Local Plan (2017). A key point to note is that, of the six 'growth areas' shown, it is only Kentish Town Regis Road that remains 'on the table' to any significant extent. Further points to note from Figure 5.3 are:

- Community Investment Programme (CIP) regeneration areas – CIP areas comprise Council-owned land, including housing estates, where the aim is to generate funding for high quality affordable housing and community infrastructure through redevelopment projects including market housing. The [CIP programme](#) has expanded significantly since 2017, but there is limited or no potential for the Local Plan to intervene (with a view to potentially boosting housing supply). CIP schemes must be handled very carefully, as they will often involve significant changes to well established communities.
- Select key areas of constraint – including Hampstead Heath and Regents Park. There are also further areas of strategic constraint besides, particularly the extensive conservation areas as shown [here](#).

5.2.16 Finally, by way spatial context, Figure 5.4 shows strategic employment areas. In summary:

- Six distinct office areas within the CAZ (including Kings Cross and Euston) plus Hatton Garden.
- Camden Town, which has a unique employment offer in the Borough.
- Small office areas closely associated with Camden Town.
- Murphy Site (Industry Area, equivalent to Locally Significant Industrial Site designation) and Regis Road at Kentish Town.
- Nearby large industrial areas at St Pancras Way (C14) and Camley Street (C15) adjacent to Kings Cross.
- Certain other larger industrial areas, notably C16 which is in use for aggregates and not available.
- Several other dispersed small industrial areas.

5.2.17 Whilst protection of employment land is important, the London Plan encourages intensification, which can be an opportunity to explore options for co-locating homes. However, there are clear issues and challenges.

Figure 5.3: Key diagram from the adopted Local Plan (2017)

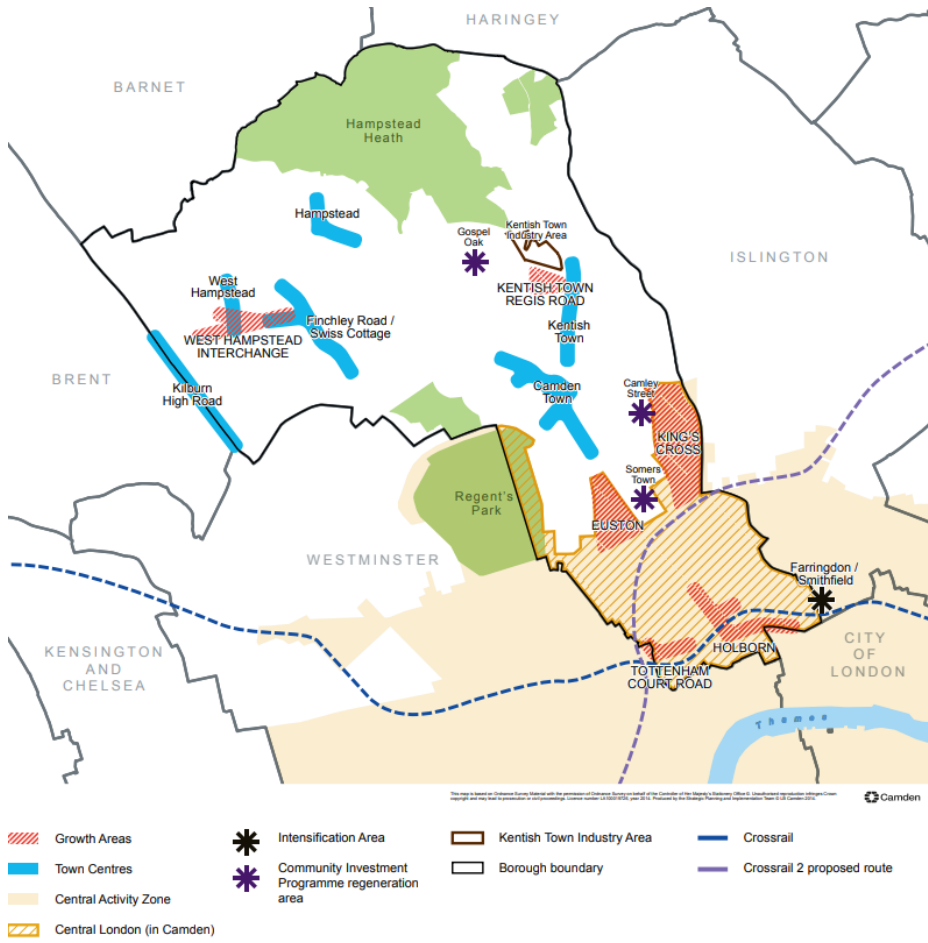
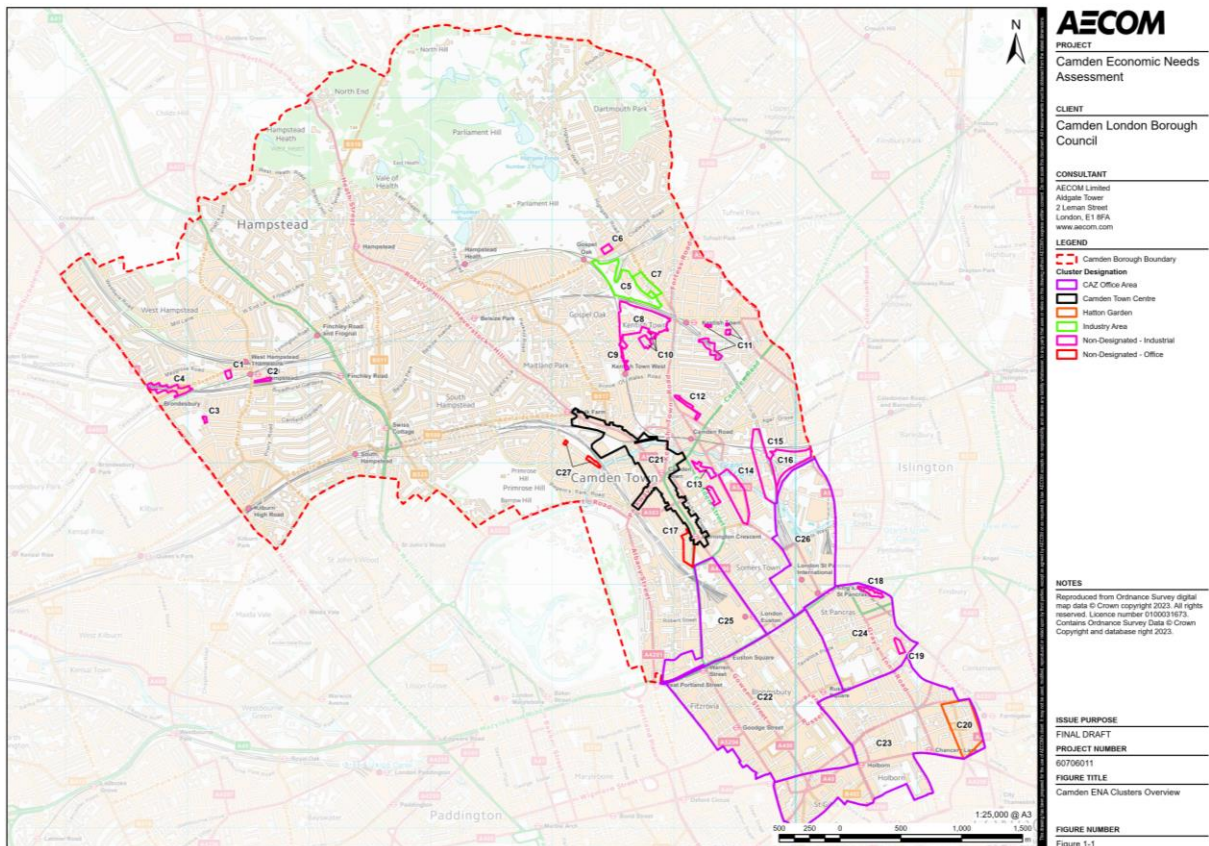


Figure 5.4: Strategic employment areas



Broadly how sites might be developed with a view to boosting housing supply?

5.2.18 It is clear that a key aim of strategic planning in the Camden context is to set development management policy. Delivering self-contained new homes is a priority objective for the Council - indeed, self-contained homes is the Council's stated priority land use - however, there is also a need to set development management policy that balances this priority objective with numerous others.

5.2.19 A balance is struck through the adopted plan, and clearly there will be many adjustments made through the new plan, some of which will amount to 'fine-tuning' but will have a significant effect (on housing supply) in combination. It is difficult to provide an overview of development management policy issues/areas with a bearing on housing supply, as they are many and overlapping, but key issues include:

- Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) – this is a key policy in the adopted Local Plan aimed at maximising housing supply (including affordable housing). Policy H2 within the adopted Local Plan applies to the CAZ and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road (although there is also general encouragement for maximising housing from mixed uses schemes borough-wide). Within the specified areas, the policy requires 50% of additional floor area, as part of any larger development / redevelopment scheme, to be delivered as self-contained housing. The Council are proposing to carry forward Policy H2 into the new Local Plan, and extend the area that it applies to, to cover all of South Camden (as well as certain other adjustments, discussed in Part 2 of this report). The potential tension is with supply of office floorspace and, in turn, with development viability, recognising that there is very high market for office and lab space.
- Offices – Camden's office stock is large (c.3-5 million sqm of floorspace) and varied in nature. There are multiple sectors and activities where the office remains an essential part of business operations, including growth sectors such as data, IT and communications. Conventional office space is also required by a variety of creative industries. There is also a strong demand for hybrid spaces and labs to support science-based and research activities, which is an example of a sector for which clustering is important.

However, it is recognised that there has been a shift towards working from home with employees in some sectors attending the workplace less frequently. Also, as part of the UK's transition to net zero there is an onus on landowners to upgrade (even relatively recently built) office buildings to meet tighter energy efficiency requirements. While there is a growing market for these 'retrofit' projects, it is likely that some office buildings are not capable of being upgraded at a reasonable cost. Another consideration is that conversion of large office buildings may in some cases provide an opportunity to deliver smaller, affordable, flexible accommodation for start-ups and SMEs.

There is a clear case for retaining office floorspace where it can continue to meet an economic need whilst providing flexibility for conversion to permanent self-contained homes where appropriate. The ENA (2023) calls for "a flexible approach that considers the merits of each individual site and which use they are best suited for"; however, there is also a need to consider the Council's strategic / policy position on this matter.

- Industrial land – Camden has a small supply of industrial land (just under 35 ha) reflecting the restructuring of the local and London economy over the last three decades. A sizeable proportion of this industrial land is located on, or near to, former railway yards and sidings and was redeveloped in the late 20th century to provide industrial sheds and storage and distribution facilities. This is often arranged at low densities and includes extensive areas of parking and yard space. About a quarter of the Borough's industrial land supply (about 8.5 hectares) is designated as an Industry Area on the Local Plan Policies Map. This is equivalent to the Locally Significant Industrial Sites (LSIS) designation used in the London Plan to describe sites with importance for industrial and related functions. However, the majority of the industrial land in the Borough is non-designated (Figure 5.4, above). Many of industrial sites are small and some sites / clusters have lost industrial capacity over the last decade, including from 'permitted development', where the use can change without the need to seek planning permission, which can affect their functioning.

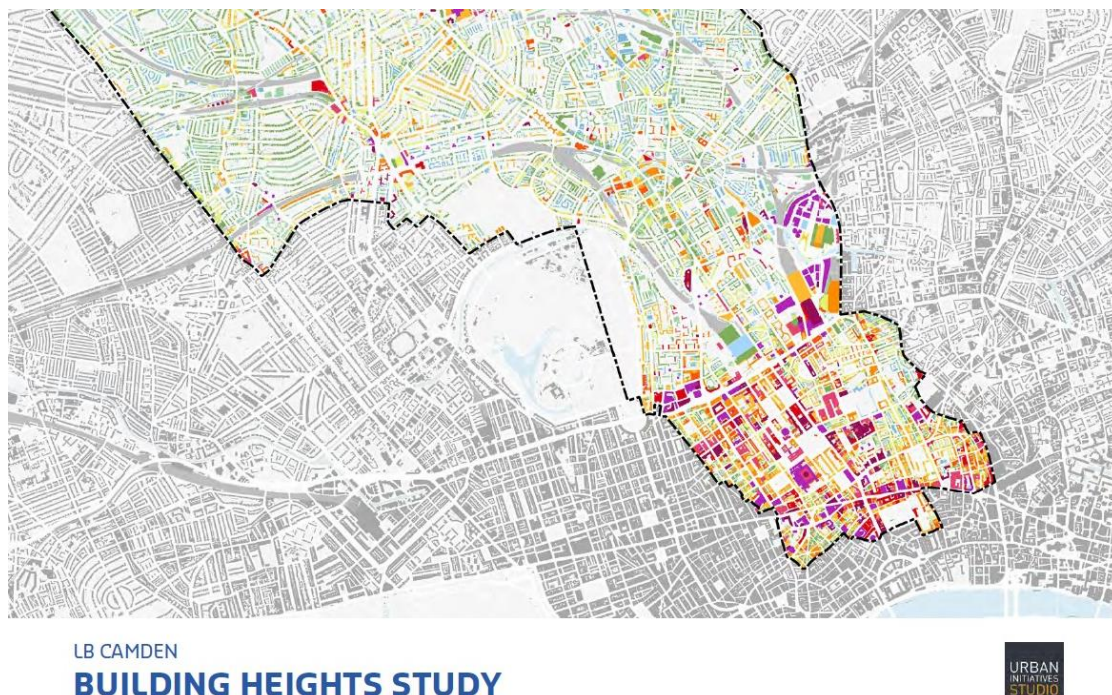
There is a clear need to maintain a diverse stock of industrial premises suitable for a range of users and activities. Loss of land for industry and storage / distribution uses to housing and offices is an issue across the Functional Economic Area (FEMA) of which Camden is a part, and across London. However, the issue for London Borough of Camden should not be overstated, with the ENA (2023) explaining:

"The average rent per sqm [industrial space] in LB Camden has experienced a significant fall since 2015 while it increased in the FEMA and London in the same time period. This evidences relatively weaker demand for industrial space in recent years, which is a manifestation of the trend forecasted for the Borough in the GLA's London Industrial Land Demand report in 2017."

There are clearly opportunities for some industrial sites to be used more efficiently in support of wide ranging Local Plan objectives. Camley Street and Kentish Town are the key areas for consideration, and redevelopment opportunities / options here have been explored over a number of years. What is certain is the need for comprehensive intensification that is “employment led”. However, within this bracket there remain strategic choices to be made through the Local Plan, including consideration of options that could potentially have the effect of boosting housing supply, in light of strategic housing targets / needs.

- Other land uses – there is a clear need to balance a mix of uses within areas, sites and individual buildings, and this is a consideration that extends beyond balancing homes and employment land. Other key land uses include retail, community infrastructure and open space / public realm. A good mix of uses can: increase the provision of much-needed housing; promote successful places that have a range of activities and are used throughout the day, increasing safety and security; reduce the need to travel by locating a range of uses together and so reduce the need for some journeys, helping to cut congestion in the borough and improve air quality. In light of these points, it is difficult to envisage a strategic choice for the Local Plan (relative to the matters discussed above, namely Policy H2 / offices and industrial land). Rather, there is a clear need to take a site-by-site approach that responds to the local context.
- Tall buildings – in line with Policy D9 of London Plan (2021), the Local Plan must define what a tall building is and identify locations within the Borough where tall buildings may be an appropriate form of development subject to meeting other policy requirements. As such, the Council commissioned a Building Heights Study to inform the policy approach in the Local Plan. The Study identified areas in Camden where significant development is expected and assessed these areas to consider whether they are locations where tall buildings may be an appropriate form of development. This process included context analysis of specific sensitivities, high level impact testing of tall building locations and advice on parameters for appropriate building heights. The key purpose of the study was to inform Local Plan policy on tall buildings (in accordance with the guidance set out in the London Plan), rather than testing site capacity, meaning that it is not possible to draw upon the conclusions of this study to identify a strategic choice around increasing height on a given site, over and above the emerging proposed approach. Instead, the suitability of any given site (within an area potentially suitable for a tall building) will be determined through the planning application process, i.e. when detailed consideration can be given to scheme proposals in the context of wide ranging design considerations and wider factors.

Figure 5.5: Front cover from the Building Heights Study (2023)



- Town centres – any town centre naturally comes into consideration as a possible location for boosting housing supply (alongside achievement of wider objectives) given that town centres are invariably highly accessible locations. However, all town centres in the Borough are associated with a particular role / function and characteristics that must be protected. Expanding on this:

The Borough's town centres are a focus for activity and community life and provide character and identity to local areas and the Borough as a whole. They are places of employment, shopping, leisure, and services and can be important for social, community and cultural exchange by providing places where people can meet and interact. Traditional retail-based centres face a number of challenges however from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out of centre retail development. Town and neighbourhood centres are also under pressure from a range of issues, including the cost of living crisis and hybrid working, which are impacting on 'footfall', particularly in the Central Activities Zone. Some of Camden's centres are in need of regeneration or diversification; however, the vast majority are performing well and appear relatively resilient, with vacancies not substantially decreasing between 2019 and 2022. The Camden Future High Streets Prospectus aims to help inspire and guide change as high streets adapt to a range of challenges. However, neither the Prospectus nor any other source of evidence serves to highlight any of Camden's town centres as locations where a step-change in respect of support for housing growth is a reasonable option to explore.

- Housing mix – the Council aims to achieve mixed and inclusive communities by seeking a range of housing types suitable for households and individuals. The Local Plan will set out clear policy promoting a good housing mix (Policy H6) and delivering both large and small homes (Policy H7). Whilst in theory smaller homes might be considered as a way of boosting the number of homes delivered, in practice there is a need to deliver housing in line with the established required use mix to meet local housing need.

Equally, whilst in theory relaxing requirements around affordable housing delivery could serve to boost overall housing delivery, in practice the delivery of affordable homes is a clear local priority.

Another consideration, and potentially a policy choice with a bearing on total housing supply, is around support for build-to-rent residential schemes, recognising that these are an increasingly popular housing product for developers. Such schemes can be an effective means of improving the quality of the overall rented stock; however, there is a need to avoid an over-proliferation. The turnover of occupiers of private rented housing tends to be rapid, so localised concentrations can impact community cohesion. Also, there are implications for securing affordable housing / affordable housing contributions.

- Other policy areas – there are numerous other policy areas where there is *feasibly* a choice between alternative policy approaches with implications for housing supply. However, it is not clear that there are any *genuine* choices between *reasonable* policy options in the Camden context with *significant* implications. For example, whilst in theory there is the possibility of compromising on space standards in order to deliver more homes, and the emerging policy approach warrants scrutiny from this perspective (see Part 2 of this report), it is not clear that there is a strategic policy choice to explore as a variable across the reasonable alternative growth scenarios.

Conclusion on broad distribution

5.2.20 This section has sought to introduce the broad scope of options for boosting housing supply, i.e. closing the gap to the target housing requirement figures, relative to the emerging proposed approach, which is the outcome of work over a number of years, including work undertaken at the time of preparing the Draft Site Allocations Local Plan. Key messages include:

- Options for boosting housing supply are inherently limited locally, given the densely developed nature of the Borough, constraints to growth and a need to balance competing land use priorities. Also, options are limited because many key sites have planning permission (and, whilst planning applications can be and often are revisited, it is rarely appropriate to assume that this will or could occur).
- Options for boosting housing supply relate to questions around *how* development is brought forward more so than *where* development is brought forwards. However, there is a clear spatial focus on Kentish Town and the Camley Street area. Within these areas there are large industrial sites that are clearly suited to employment-led intensification, but within this bracket there may be choices to explore through the Local Plan, to include consideration of options with a focus on boosting housing supply.

5.2.21 These key messages, along with other more detailed messages set out within the discussion above, serve to set parameters to enable a more focused discussion of options below.

5.3 Site options

Introduction

5.3.1 The aim of this section is to introduce the site options that are available and in contention for allocation, and work that has been completed to appraise each in turn. To recap, this is a 'bottom-up' workstream undertaken as a component of the wider process of defining reasonable alternative growth scenarios.

Identifying and sifting site options

5.3.2 The process of identifying site options began in 2018 with site options identified from: existing and emerging plans; the London SHLAA; planning applications; and a 'Call for Sites'. In total 220 sites were identified.

5.3.3 The 220 sites identified were then subjected to a staged sifting process, with stages as follows: Site eligibility; Basic site suitability and high level availability check; Detailed site suitability and sustainability check; and Achievability check. Following this, the Council went through a process of defining and applying a set of 'rules' with a view to establishing the uses that might be suitable at each of the preferred sites. The following three rules were applied: 1) A site is potentially suitable for residential unless there are potential issues around amenity; 2) A site is potentially suitable for employment where it is in an employment area or in a town centre; 3) A site is potentially suitable for town centre uses if it is within a town centre.

5.3.4 The process ultimately led to the identification of 88 sites for allocation, which were published for consultation in the Draft Site Allocations Local Plan (SALP, 2020). With regards to the remaining ~130 sites, all were discounted for clear cut reasons – see the Appendix 1 of the Draft SALP from 2020 and Appendix E of the accompanying Interim SA Report. N.B. an additional Draft SALP consultation was held in 2021/22.

5.3.5 The decision was then taken in 2022 to begin a review of the Local Plan and incorporate the site allocations from the Draft SALP into the new Local Plan, with the aim of a more holistic and place-based approach.

5.3.6 Subsequently a call for sites was held over Nov 22 – Jan 23, alongside a wider 'Call for Views' to inform the development of the new Local Plan. Five new sites were submitted and then subjected to the same sifting process as used previously (see above), however none were considered suitable for allocation.

5.3.7 Also, since 2022 all sites previously proposed for allocation in the Draft SALP have been reviewed and updated. Results include: 21 sites previously allocated in the Draft SALP have been removed due to the fact that they are completed, significantly under construction, or no longer expected to come forward; and five new sites been identified as suitable for allocation. Of these five sites, four have planning permission.

5.3.8 Site options considered for allocation but ultimately discounted are listed in **Appendix II** of this report. Also, Appendix II presents an informal appraisal of the 72 site options taken forward for allocation (building upon equivalent work presented within the Interim SA Report published alongside the Draft SALP, 2020).

Site capacity and use mix

5.3.9 The Draft Site Allocations Local Plan 2020 set out a preferred approach to capacity and use mix for each of the proposed 88 site allocations, and this was appraised as part of the SA at the time.

5.3.10 As part of the preparation of the draft new Local Plan the capacity and use mix for the proposed site allocations has been reviewed and updated to take into account: comments made as part of the consultation on the draft SALP; further information provided by site promoters; planning applications/ permissions; planning frameworks and briefs; the emerging proposed policy approach in relation to the promotion of the re-use of buildings over demolition; and further design work looking at site capacity.

Summary

5.3.11 Work undertaken over a number of years has led to the identification of 72 sites for allocation, and there are not considered to be any reasonable alternatives involving boosting supply via the allocation of additional sites. All sites not proposed for allocation are discounted for clear cut reasons, as opposed to reasons arrived at after having made a balanced judgement in respect of suitability.

5.3.12 Many of the proposed allocations have planning permission, and hence need not be a focus of further consideration. Whilst planning permissions can and often do get revisited in the Camden/London context, it is reasonable to focus attention on non-permitted sites.

5.3.13 At all or most of the non-permitted sites there is feasibly potential to consider varying the preferred/assumed capacity (boosting density) and or use mix (focus on homes), and attention focuses on certain key sites (as discussed below). However, overall, there is limited room for manoeuvre, i.e. limited potential to boost supply over-and-above the emerging proposed approach, which reflects work over a number of years accounting for well-established policy and site-specific factors.

5.4 Sub areas

5.4.1 Discussion has so far focused on A) 'top down' considerations with a bearing on reasonable scenarios for boosting housing supply; and B) 'bottom-up' consideration of site options. The next step is to consider each of the Borough's sub-areas in turn, exploring options for boosting housing supply in more detail.

N.B. to recap 'boosting housing supply' specifically means boosting supply relative to the emerging proposed approach, with a view to 'closing the gap' to the target housing requirement figures.

5.4.2 Each of the Borough's four sub-areas are considered in turn below. The two sub-areas associated with least potential for significantly boosting supply are considered first (namely West and North Camden), followed by Central and South Camden, where there are significant options for consideration.

West

5.4.3 The west of the Borough includes the neighbourhoods of Kilburn, Fortune Green, West Hampstead, South Hampstead and Finchley Road/ Swiss Cottage. The area is predominantly residential in character, comprising a mixture of Victorian villas and terraces and post war estates, with pockets of inter-war housing and more modern development. Large parts of this area are also designated as conservation areas.

5.4.4 The area contains three town centres: Kilburn High Road, Finchley Rd/ Swiss Cottage and West Hampstead, in addition to several neighbourhood centres. These centres act as vibrant community hubs, providing retail and leisure uses, community facilities and employment uses. These town centres also serve a local economic function, providing secondary office accommodation, generally in small to medium premises. There are also clusters of industrial land around West Hampstead and Kilburn.

5.4.5 The draft Local Plan sets out the Council's strategy to guide the future development of this area and makes a number of site allocations to take forward development.

5.4.6 The most significant allocation is land comprising the site of the O2 Centre, car park, car showrooms, and 14 Blackburn Road however (W2), this site has planning permission (part Outline) subject to S106. The permitted scheme will deliver a new neighbourhood including 1,800 homes alongside: town centre uses including retail and leisure; health and community facilities; employment floorspace; and open space. To guide the development of this area the Council has adopted the West End Lane to Finchley Road Supplementary Planning Document and the Fortune Green and West Hampstead Neighbourhood Plan also sets out the communities' vision and objectives for the area.

5.4.7 13 Blackburn Rd (W4) is then a closely related site that now has planning permission subject to S106. The draft Local Plan also proposes to allocate **11 Blackburn Road** (W3) for a mixed use development including commercial and 14 self-contained homes (henceforth, within the remainder of this section, simply 'homes') to assist with the delivery of the Council's and the communities vision for the wider area.

5.4.8 A short distance to the west is then **188 - 190 Iverson Rd** (W5), which is an industrial site proposed for offices, light industrial and housing (15 homes). This is a small site (0.25 ha) and re-providing employment floorspace is a priority objective (also a SINC is adjacent), hence there is little scope to boost housing supply.

5.4.9 To the north, **Gondar Gardens** (W7) has been subject to several proposals for development. Although all were refused by the Council, two were allowed at appeal. Whilst the proposals allowed at appeal have lapsed, these establish the principle of, and some parameters for, development on this site. The proposal is for a housing only site, and this is a unique site comprising a decommissioned reservoir and Grade II SINC within a housing estate. As such, there no potential to significantly boost capacity.

5.4.10 To the south, both Abbey Co-Op site (W10) and Liddell Road Industrial Estate (W12) have permission.

5.4.11 Finally, there are six sites located on the eastern side of Finchley Road, within or close to the town centre. Four of these sites have permission,⁵ but the other two warrant consideration:

- **BP Petrol Station, 104 Finchley Road (W9)** – is subject to a current planning application for 30 homes. The proposal here is to deliver offices as well as new homes, but this is a very small site (0.08 ha), which indicates little potential to significantly boost the number of homes. It is also a current petrol station site.
- **Meridian House (W6)** – does not have planning permission, but there is little or no room for manoeuvre in respect of site capacity or use mix in order to boost housing supply. This site is allocated for the delivery of additional residential units to the rear of the site, on the former caretakers cottage area, where a previous permission was granted. Comprehensive re-development of the whole site is not envisaged here and would need to be justified in accordance with emerging Policy CC2 (Repurposing, refurbishment and re-use of existing buildings). There are existing employment uses and there are sensitivities including adjacent Finchley Road, an adjacent conservation area, a cluster of protected trees and the train line passing underneath the site. The indicative site capacity is 12 homes.

5.4.12 In **conclusion**, there is no reasonable scenario involving significantly boosting the supply of homes.

Figure 5.6: Sites proposed for allocation in the West sub-area



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North

5.4.13 The north of the Borough includes the neighbourhoods of Hampstead, Highgate and Frognal and is characterised by its striking topography, rich heritage, distinct character and unique open spaces. The area is predominantly residential in character, with a mix of large and small homes, often with generous gardens, situated on leafy streets. It is also covered, almost entirely, by a number of designated conservation areas, containing hundreds of listed buildings of architectural and historic interest.

⁵ 100 Avenue Rd (W11), 551-557 Finchley Rd (W13), Land at Midland Crescent/ Finchley Rd (W8), and 317 Finchley Rd (W14)

5.4.14 Hampstead is the only town centre, providing a high-quality retail and leisure offer, with a range of independent and niche shops catering both for local residents and visitors. The centre also serves a local economic function, providing secondary office accommodation, generally in small to medium premises.

5.4.15 Given the established historic character of the area opportunities to deliver new homes, jobs and infrastructure in the north of the borough to support Camden's communities are inherently limited.

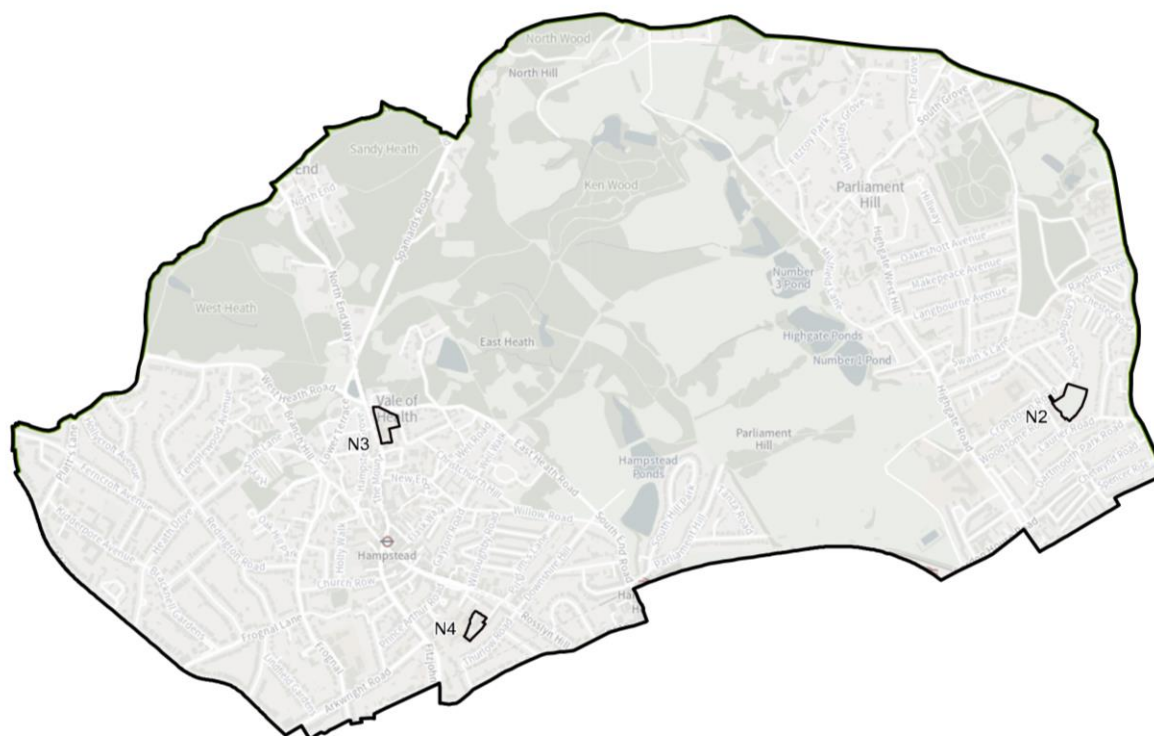
5.4.16 The emerging proposal involves just three site allocations.

5.4.17 Two of these are located to the west of Hampstead Heath, and neither has planning permission, namely **Queen Mary's House (N3)** and **Hampstead Delivery Office (N4)**. However, at both sites the proposal is already to deliver a housing only scheme and both sites are located in a conservation area. The latter site is located close to Hampstead town centre, but this is a fairly small site (indicative capacity 45 homes).

5.4.18 The final site in this area, to the east of Hampstead Heath, is the **Former Mansfield Bowling Club (N2)**. In January 2017 planning permission (2015/1444/P) was granted on appeal for 21 new dwellings, a new public space, enhanced tennis facilities and an ancillary sports pavilion. This permission was later varied through changes to the layout and mix within the proposed buildings to include two additional dwellings (2018/1701/P). However, there is currently a current pending planning application (ref. 2022/5320/P) for a 78 bed care home, plus the northern part of the site is proposed for open space including community garden, tennis courts and tennis pavilion. The proposed site policy supports a housing led scheme, in line with the previous planning permission, with an indicative capacity of 23 homes. The site is located in a conservation area and part designated as private open space and Local Green Space, which serves to limited options.

5.4.19 In **conclusion**, there is no reasonable scenario involving significantly boosting the supply of homes.

Figure 5.7: Sites proposed for allocation in the North sub-area



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Central

5.4.20 The central part of the borough includes the neighbourhoods of Gospel Oak, Haverstock, Kentish Town, Belsize Park, Primrose Hill and Camden Town. The area is predominantly residential, with each neighbourhood having its own identity and distinct characteristics. From the Victorian villas and leafy streets of Primrose Hill and Belsize Park; to the post war housing estates in Gospel Oak and Haverstock; the Victorian terraces and clusters of industrial uses in Kentish Town; and the pockets of more modern development in Chalk Farm and Camden Town. Again, large parts are designated as conservation areas.

5.4.21 The area contains two town centres: Camden Town and Kentish Town, in addition to several neighbourhood centres. These centres form a focal point within these areas and are central to their individual identities. Camden Town is an important secondary office market within the Borough and has a strong representation of creative businesses. Kentish Town is also an attractive location for creatives. There are significant clusters of industrial uses in Kentish Town, mainly at Regis Road and on the Murphy site, with a concentration of small and medium sized enterprises also located within premises close to Highgate Road.

5.4.22 Guided by the discussion in Section 5.2, the discussion here is presented under three headings.

Camden Goods Yard

5.4.23 This is the primary growth location in Camden Town Centre, with the emerging proposal for a total of ~1,200 homes over the plan period. This area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a mix of homes and alongside retail and a range of employment spaces. To guide the development of this area the Council has prepared the Camden Goods Yard Planning Framework.

5.4.24 The main component of the Camden Goods Yard Area is the Morrisons Supermarket site (C7) and the former Morrisons petrol station (C8). The development of the Morrisons Supermarket site was permitted in 2018, with subsequent applications also permitted, including most recently in 2023, to deliver additional homes (ref. 2022/3646/P). This site is now under construction, along with the former petrol station.

5.4.25 The second largest component of the Camden Goods Yard cluster is then Juniper Crescent (C10), a Council housing estate where residents recently [voted](#) for redevelopment (after a previous unsuccessful ballot). Gilbeys Yard is also a Council housing estate (C12), but residents here voted against regeneration in a 2020 ballot. Both sites are expected to achieve optimum site capacity, involving 290 and 190 homes respectively.

5.4.26 This leaves two non-permitted sites at the northern extent of the cluster (either side of the railway), namely:

- **100 Chalk Farm Road (C9)** – was proposed for offices and retail / food and drink in the Draft SALP (2020), however the new proposed approach reflects the site promoters aspirations to deliver self-contained homes and student accommodation. The site is proposed for 100 homes and is notably within a conservation area and adjacent to Grade II* listed Camden Roundhouse.
- **Network rail land adjacent to Juniper Crescent (C11)** – does not have planning permission. The Draft SALP proposed 50 homes as well as employment (offices / light industry), and the preferred approach is broadly unchanged at the current time. The site is located at the intersection of two railway lines, and access is a clear challenge, given the railways and the adjacent Juniper Crescent estate. The site is also currently safeguarded to support High Speed 2 construction works and provides an operation access point to the railway. Given the constraints that exist on this site, and its existing use, options for boosting housing supply here are limited.

Kentish Town

5.4.27 Development in Kentish Town will mainly be delivered through site allocations at **Regis Road and Holmes Road Depot (C2)** and the **Murphy Site (C3)**. These sites are uncommitted and together are expected to deliver approximately 1,750 new homes, in line with the Kentish Town Planning Framework. These existing employment sites will be intensified to deliver a new neighbourhood that provides a mix of uses, including industry and other employment uses, community facilities, cultural and leisure uses and open space. The ambition is for an exemplar employment-led mixed-use area that is fully integrated with surrounding communities.

5.4.28 It is also important to note an application for Murphy's Site that was withdrawn in 2022. The application proposed a quantum of homes in line with the Draft SALP / Planning Framework but proposed tall residential towers (up to 19 storeys), which generated local concerns given nearby Parliament Hill. The Kentish Town Planning Framework provides an approach to land use stating: *"Redevelopment creates the opportunity to consolidate this space that allows for the intensification of the site and the co-location with other uses"*. The Framework focuses residential in the north and south of the site, with mixed uses including industry in the central area. An increased focus on residential within the centre of the site could boost housing supply but would have the potential to negatively impact the function of employment space.

5.4.29 Of the remaining four sites in this area, two have planning permission, namely 369 – 377 Kentish Town Road (C5) and Highgate Centre (C19), leaving:

- **Kentish Town Police Station (C4)** – the preferred approach involves the retention of the existing police station and the provision of 35 homes. The site is not within a conservation area, but the Police Station is listed, which could serve to suggest limited potential to deliver a higher density scheme.
- **Kentish Town Fire Station (C6)** – the preferred approach involves the provision of a replacement fire station and 30 homes on a 0.24 ha site. Heritage is not a significant constraint, but there is a need to avoid conflict with the operational activities of the fire station, which will have implications for the number of homes possible. The Fire Station is also a protected community use, meaning that should the fire station be declared as surplus to the operational needs of the London Fire Brigade, the site should be assessed for its suitability for an alternative community use. Where it can be demonstrated to the Council’s satisfaction there is no reasonable prospect of alternative community use as part of a mixed-use scheme, the Council’s preferred alternative is development for housing including affordable homes.

Figure 5.8: Murphy’s Yard planning application (2021; now withdrawn) – proposed ground floor uses



Figure 5.9: Figure from the Kentish Town Planning Framework (2020)



Other development sites

5.4.30 Other notable development sites within the Central Area are considered below.

5.4.31 Firstly, there are three modest-sized sites with planning permission.⁶ A larger site with planning permission is then Bacton Low Rise, Haverstock Road (C22; 294 homes), and there are two housing estates set to see redevelopment following a ballot – West Kentish Town (C13) and Wendling and St Stephens Close (C14).

⁶ Grand Union House (C20), Former Charlie Ratchford Centre (C23) and 52 Avenue Road (C24)

5.4.32 With regards to uncommitted sites, the following bullet points consider sites in broad priority order:

- **Shirley House, 25-27 Camden Road (C15)** – comprises an office block in Camden Town located at the junction of two busy roads and within a conservation area. The emerging preferred approach involves office floorspace and an indicative capacity of 30 homes. There could feasibly be the potential to modestly boost housing supply via a higher density scheme and/or reduced office space; however, the site is well-suited to offices given proximity to the town centre.
- **Arlington Road former depot site (C18)** – was until recently used by Camden Council as offices as a base for its street cleaning services. The site is allocated for a mixture of uses including light industrial, housing and commercial development. The proposal is to support 66 additional homes whilst not compromising the functioning of existing and future employment uses.
- **Camden Town over station development (C16)** – is located in the very heart of the town centre and is a complex site where the intention is to deliver a new station entrance and associated uses with housing on upper storeys, as well as space for creative industries. The emerging preferred approach involves 60 homes. Camden Town Centre is predominantly characterised by a fine grain urban pattern of modest scaled low rise buildings, which is an important factor with a bearing on development height and massing.
- **UCL Camden Campus, 109 Camden Road (C17)** – is proposed for student accommodation (180 units). Given the existing halls use there is little reason to suggest that self-contained homes is an option. It is also noted that there are conservation areas adjacent on two sides.
- **Heybridge Garages, Hadley Street (C21)** – is not within a conservation area and West Kentish Town Station is nearby, but this is a very small site judged to have indicative capacity for just ten homes.

Conclusion

5.4.33 In conclusion, this is key sub-area for consideration, as part of efforts to boost housing supply in the context of stretching target housing requirement figures (as discussed in Section 5.2). Here attention focuses primarily on Kentish Town, with Shirley House, 25-27 Camden Rd being another site of note.

Figure 5.10: Sites proposed for allocation in the Central sub-area



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South

5.4.34 The South of the borough includes the neighbourhoods of Covent Garden, Holborn, Hatton Garden, Gray's Inn, Bloomsbury, Fitzrovia, Euston, Regents Park, King's Cross, St Pancras and Somers Town.

5.4.35 At the heart of these neighbourhoods are strong and diverse residential communities which form part of a dense mix of uses, from renowned institutions such as the British Museum and University College London, to the focus of London's legal profession within Holborn, the retail attractions of the West End at Tottenham Court Road and Covent Garden, and offices for major businesses including tech and life sciences clusters.

5.4.36 The area is characterised by a mix of historic and modern buildings of significant scale and at high densities. Again, large parts are covered by conservation areas, and historic London squares are characteristic. The area forms a significant part of London's Central Activities Zone (CAZ), and is also home to the Knowledge Quarter, which is centred on King's Cross and Euston.

5.4.37 The main focus of development over the last 10 years has been at King's Cross, however development here is nearly complete. Major development is also planned at Euston, however this is likely to come forward towards the end of the Plan period and will be guided by the Euston Area Plan.

5.4.38 The discussion of options for the Local Plan is presented under three headings.

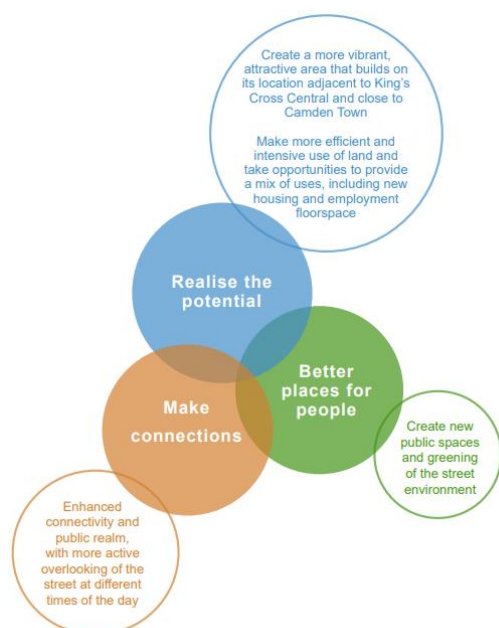
Camley Street

5.4.39 A number of the sites in the Camley Street area have planning permission.⁷ A key site here is St Pancras Hospital (S7), which has permission for 200 homes. Also, Agar Grove Estate (S20) has permission for redevelopment that will deliver 493 homes (a net increase of 244).

5.4.40 This leaves four sites without planning permission. The **Shorebase Access** site (S8) is of modest size (40 homes), leaving the remaining three sites as key sites for consideration, as industrial sites where the proposal is for employment-led mixed use intensification. A key aim is to ensure a net increase in employment floorspace in the Camley Street area, including the appropriate re-provision of industrial, storage or distribution floorspace that supports the functioning of the CAZ and local economy. However, there may still be options to explore that would involve boosting housing supply. The sites are as follows:

- **104 – 114 Camley Street** (S5) – proposed for a mix of uses including 750 homes (net) on a 2.5 ha in site.
- **Parcelforce ATS Tyres** (S6) – proposed for a mix of uses including 280 homes (net) on a 1.5 ha in site.
- **120 – 136 Camley Street** (S4) – proposed for a mix of uses including 110 homes (net) on a 0.5 ha in site.

Figure 5.11: Priorities set out within the Canalside to Camley Street SPD



⁷ St Pancras Commercial Centre (S21), 6 St Pancras Way (S22), St Pancras Hospital and Agar Grove Estate (S20)

Holborn and Covent Garden

5.4.41 Development around Holborn has the potential to strengthen its role as a location for business, reflecting the connectivity brought by the Elizabeth Line, and create more vibrant and better connected neighbourhoods in the heart of Central London. To guide the development of this area the Council is in the process of preparing the Holborn Vision and Urban Strategy.

5.4.42 Six of the proposed allocations are now permitted,⁸ the most significant of which is Former Central St Martins College (S17), where the planning permission is for 34 homes. This is an example of a site that might have been considered for additional homes.

5.4.43 With regards to sites without planning permission, the first site to consider is **135-149 Shaftesbury Avenue** (S19), where the proposal is for a cultural use, with the site not suited to residential. This leaves two sites:

- **Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street** (S18) – comprises a number of elements, including a Travelodge Hotel and multi storey car park and a number of Grade II Listed Buildings. A contribution to delivery of housing will be expected, having regard to policies including Policy H2, which has been estimated at 10 additional homes but should reflect the scale of all additional floor area (GIA) proposed. Planning permission (2023/2510/P) and listed building consent for a mix of uses including offices, town centre uses and self-contained homes is under consideration by the Council. A decision is expected in late November 2023.
- **Cockpit Yard and Holborn Library, 32-38 Theobalds Road** (S28)– the Draft SALP proposed a library and 120 homes, and the proposal is now to support 110 homes. This is a council owned site with a long planning history, and the site is currently in active employment use including creative industries.

Other development sites

5.4.44 Finally, there is a need to consider other development sites in this area. Beginning with the sites that are approved, there are eight in total,⁹ with the most significant being the Former Royal National Throat, Nose and Ear Hospital at 330 Grays Inn Road (S12), which has permission for 76 homes (noting a higher indicative capacity in the Draft SALP). A market preference for employment uses is a trend across this area.

5.4.45 Other allocations without planning permission are then as follows:

- **Land at Pakenham Street and Wren Street** (S15) – the site is currently occupied by a number of small businesses, including printing, graphic design, video graphics, light manufacturing and offices. The site size and location means that there is an opportunity to reprovide/intensify the commercial floorspace and include floorspace for other uses such as new homes. Further context is that the site was identified in the 2013 Site Allocations Plan as a potential location for a new secondary school. However, at the time of writing, the most recent pupil place projections for Camden indicate that there is no current need for a new secondary school in this location. The latest pupil place projections figures will be kept under review.

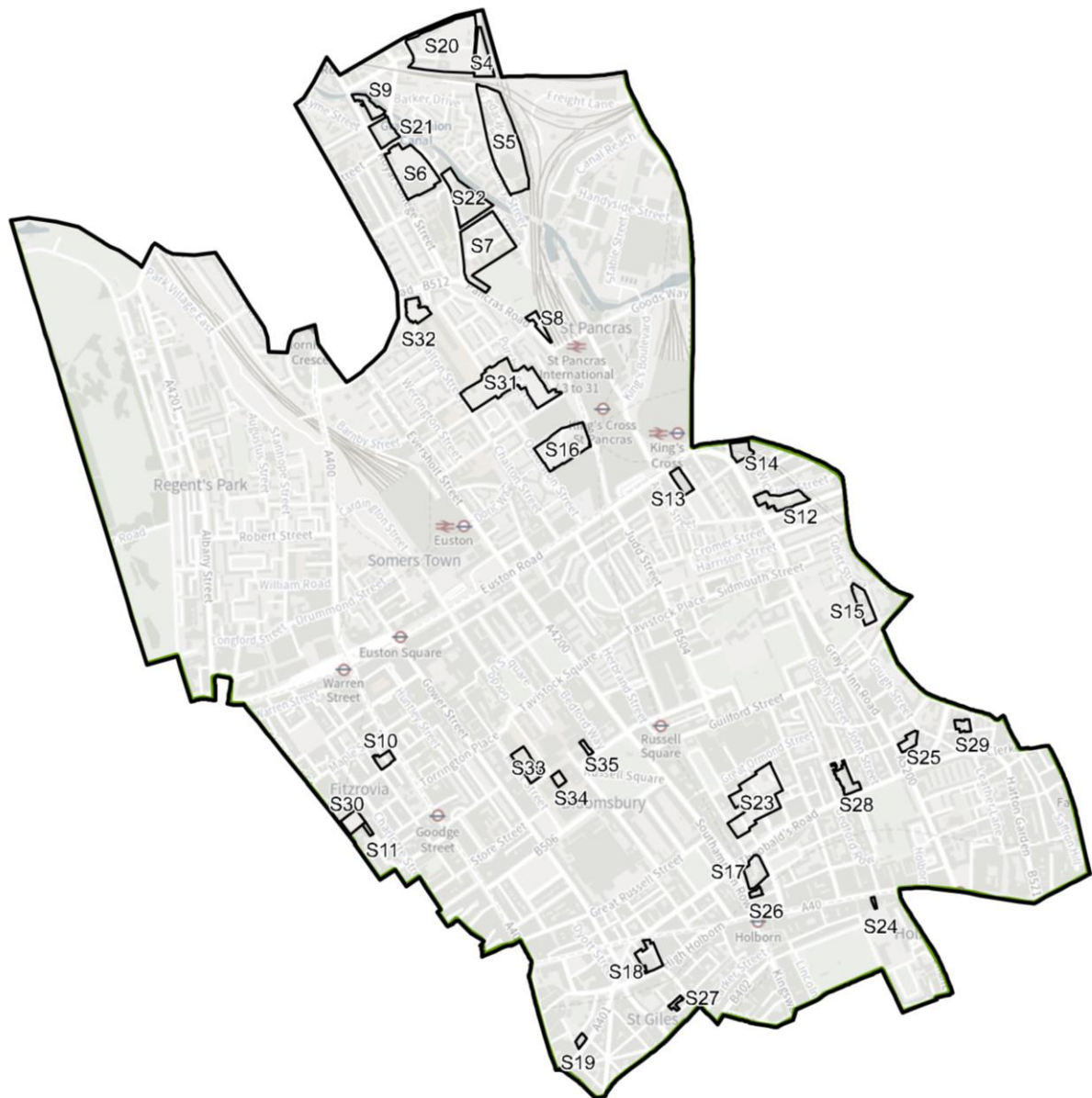
The current proposal is for intensified employment uses and 70 homes, in line with the Draft SALP. It is also important to note that there are sensitivities here, with the Bloomsbury Conservation Area adjacent and parts of the site locally listed and considered to be of historical and architectural significance.

- **Former Thameslink, Pentonville Road** (S14) – a very small site in the Kings Cross Conservation Area. This is a complex site given nearby late night uses. The Draft Local Plan proposes research and knowledge based uses and 12 additional homes (subject to the applicant being able to demonstrate the site is suitable for housing due to the nearby constraints).
- **Eagle Wharf and Bangor Wharf** (S9) – a small site within the Regents Canal conservation area, currently used for offices and storage. The site is proposed for housing and employment uses, including 50 additional homes. Given the location of the site within a conservation area and the fact that it is adjacent to the Regent's Canal/Grand Union Canal, there is limited scope to boost housing supply here.

⁸ Former Central St Martins College (S17), Tybald Estate (S23), 294 – 295 High Holborn (S24), 156 – 164 Grays Inn Road (S25), 8 – 10 Southampton Row (S26), 60 – 67 Shorts Garden and 14 – 16 Betterton Street (S27)

⁹ Network Building and Whitfield Street (S10), Former Tottenham Mews Day Hospital (S11), Former Throat, Nose and Ear Hospital (S12), Belgrove House (S13), Land to the rear of the British Library (S16), Middlesex Hospital Annex (S30), Central Sommers Town (S31) and Charlton Street (Godwin and Crowndale Estate) (S32)

Figure 5.12: Sites proposed for allocation in the South sub-area



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Conclusion

5.4.46 In conclusion, this is key sub-area for consideration, as part of efforts to boost housing supply in the context of stretching target housing requirement figures (as discussed in Section 5.2). As well as application of Policy H2 across the sub-area (discussed in Section 5.2), attention focuses on the Camley Street area.

N.B. it is also important to recall that sites are also allocated through the Euston Area Plan.

Conclusion on sub-areas

5.4.47 This section has given detailed consideration to site options by sub-area (informed by Sections 5.2 and 5.3). The outcome is confirmation that there is little or no opportunity to boost housing supply in the West and North Camden, i.e. attention focuses on Central and South Camden. Within these areas, attention focuses on non-permitted industrial sites where the emerging proposed approach is mixed-use intensification. A very small number of additional site allocations are of also note, either in terms of site capacity or the balance between new homes and office space. Policy H2 across South Camden also warrants ongoing scrutiny.

5.5 Reasonable growth scenarios

- 5.5.1 The aim of this section is to conclude on reasonable growth scenarios for appraisal (in Section 6) in light of the process set out above (see Figure 5.1 for a summary).
- 5.5.2 The emerging preferred approach involves setting the housing requirement at 11,550 homes in total, or 770 dwellings per annum (dpa) on average. Supply would come from allocations delivered at the capacity figures discussed in Section 5.4, existing permissions and windfall development.
- 5.5.3 This housing requirement figure aligns with paragraph 4.1.1 of the London Plan, which states: “*If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA.*” However, as discussed in Section 5.2, there is also a strategic case for boosting housing supply.
- 5.5.4 On the basis of the discussion above (Sections 5.2, 5.3 and 5.4), it is very difficult to pinpoint precise ways of boosting housing supply, but there is nonetheless a need to explore matters further.
- 5.5.5 Also, in addition to exploring the possibility of boosting housing supply relative to the emerging proposed approach, it is considered appropriate to consider a lower growth scenario. Specifically, there is a need to remain open to the possibility of a lower growth scenario whereby there is more of a business as usual approach to the protection of industrial land (as opposed to the emerging proposed approach, which supports intensification to include co-location of housing).
- 5.5.6 As such, on balance, the **three reasonable alternative growth scenarios** presented in Table 5.1 are progressed to Section 6 for appraisal. It is important to note that these are the ‘reasonable alternatives’ for the Local Plan *at the current time*. There will be the potential to undertake further work at the next stage.

Table 5.1: The reasonable alternative growth scenarios

Scenario	Objectives
Lower growth	The assumption is that the housing requirement might be set at a figure perhaps 1,000 homes lower than the emerging preferred option, so ~ 10,500 homes over the plan period. There would be more limited potential to deliver new homes as part of mixed use redevelopment at Murphy Site, Regis Road and in the Camley Street area. There would also be implications for employment land supply locally (as discussed in the appraisal).
The emerging preferred option	Under this scenario the housing requirement is set at 11,550 homes in total. Allocations would deliver the capacity figures discussed in Section 5.4, and the clear aim is also to align with the recommendations of the Employment Needs Assessment (ENA, 2023).
Higher growth	On balance, it is assumed that the housing requirement would be set at 12,850 homes, calculated as the London Plan target for the first three years of the plan period (1,038 x 3) plus the London Plan SHLAA figure for the latter 12 years (811 x 12). It is difficult to pinpoint where and how housing supply would be ‘boosted’ under this scenario, relative to the emerging preferred option, but a wide range of issues/options can be explored through the appraisal, guided by the discussion in Sections 5.2 - 5.4. There would be implications for employment land supply locally (discussed in the appraisal).

A note on higher growth scenarios

- 5.5.7 It is recognised that there are further higher growth scenarios that might feasibly be explored; however, on the basis of the discussion presented across Sections 5.2 – 5.4 these are judged to be unreasonable.
- 5.5.8 Firstly, there is a need to consider accounting for the supply ‘backlog’ of homes that has built up since 2019, as measured against the London Plan target. The backlog is expected to be ~1,720 homes by the start of the plan period (1st April 2026), hence there is a theoretical higher growth scenario involving setting the housing requirement at $12,850 + 1,720 = \sim 14,600$ homes.
- 5.5.9 Also, there is the theoretical possibility of simply rolling forward the London Plan target (1,080 homes per annum) for the entire plan period, which would involve setting the housing requirement at 15,570 homes.

5.5.10 A further consideration is potentially whether unconstrained housing need is higher still, recognising that the London Plan housing target was set after having accounted for capacity constraints and, prior to this adjustment, the Draft London Plan proposed a target of 1,380 homes per annum for Camden.

5.5.11 Also, there is a need to note the Government's standard method for calculating housing need (NPPF paragraph 61), which serves to indicate a housing need figure closer to 2,000 homes. However, the Local Housing Needs Assessment (LHNA, 2022) does not support this figure (Section 5 of the report).

5.5.12 There can also be a question-mark around whether affordable housing needs can serve as a reason to consider 'boosting' the housing requirement, with the PPG explaining: *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."* However, the LHNA does not support this approach either.

6 Growth scenarios appraisal

6.1 Introduction

6.1.1 The aim here is to appraise the three growth scenarios (Section 5) under the SA framework (Section 3).

Appraisal methodology

6.1.2 The appraisal is presented under 15 headings – one for each of the topics that together comprise the SA framework (see Section 3), before a final section presents an overview 'matrix'. Under each heading, the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.¹⁰

6.1.3 A key point to note is that the appraisal is undertaken with minimal assumptions regarding development management policies, i.e. the aim is not to present an appraisal of three alternative Draft Plans.

6.2 Appraisal findings

6.2.1 The appraisal is presented under 15 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix.

Homes

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
3	2	

"Promote the provision of a range of high quality and affordable housing to meet local needs"

6.2.2 There is a clear need to rank the scenarios in order of total growth quantum, recognising that Camden is one of the least affordable places to live in the country, and there is a shortage of affordable housing of all types and tenures. Affordability of market housing and the lack of affordable housing (as defined by the NPPF and the London Plan) is forcing people to move out of Camden, and many people who have grown up in the Borough cannot afford to stay and start a family.

6.2.3 As discussed in Section 5.5, there are high level arguments for pursuing a level of housing growth even in excess of 12,850 homes. Further context is provided by the Camden Local Housing Needs Assessment (2022), which concludes (see Section 5: "Overall Housing Need") as follows:

- *"Figure 27 shows a demographic need for 17,474 households across the period 2021-39 for Camden, including a net additional need for 7,776 for those unable to afford market rents."*

¹⁰ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

- ... the London Plan sets a 10-year housing target... [of] 1,038 dwellings per annum. It is this annual figure which we have used over the 18 year period 2021-2039 as the basis for the total dwelling needs of Camden. This equates to 18,684 additional homes in total."

- 6.2.4 Growth scenarios involving a quantum of supply sufficient to enable the housing requirement to be set at a figure in excess of 12,850 homes are judged to be 'unreasonable' in light of capacity / supply options (after having accounted for factors including site availability and constraints). However, the scale of need is a key consideration here, as we look to draw conclusions on significant effects.
- 6.2.5 In **conclusion**, there is a clear need to place the scenarios in an order of preference according to the total number of homes provided for. With regards to significant effects: on balance it is appropriate to flag 'significant negative effects' for the lowest growth scenario and a 'limited or uncertain' negative effect for the emerging proposed approach. In practice, there will be the potential for the new London Plan to give strategic consideration to meeting housing needs across London, accounting for constraints to growth affecting boroughs such as Camden; however, the timetable for the new London Plan is currently uncertain.

Health

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
2	1 	2

"Promote a healthy community"

- 6.2.6 A key consideration here (recognising crossover with discussions under other topic headings) is the question of supporting high quality new developments with a strong focus on health and wellbeing, to the benefit of both new and existing residents. This includes schemes designed with a clear focus on place-making, with good space standards, generous open space and also with a focus on support for active travel.
- 6.2.7 As discussed within Section 5, whilst the growth scenarios are not defined with any precision, in terms of specific sites / locations, it is recognised that attention focuses on the two adjacent sites in Kentish Town (Regis Road and Holmes Road Depot, and Murphy Site) and also the Camley Street area, as locations where there potentially remain outstanding questions in respect of the number of new homes to be supported through the Local Plan.
- 6.2.8 At all of these sites the emerging preferred approach, which has developed and evolved over a number of years, is focused strongly on place-making and other health-related objectives, and it could potentially be that the higher growth strategy would lead to tension with these objectives. In particular, this could be the case if higher density development necessitates less open space and/or if it creates challenges in terms of integrating homes with re-provided industrial uses. Focusing on the latter issue, there is a need to avoid or mitigate potential concerns around noise pollution and road safety (associated with HGV / van movements).
- 6.2.9 However, it is difficult to draw strong conclusions, as there could be ways of designing the schemes in such a way that additional homes can be delivered whilst avoiding tensions with health-related objectives. This could involve increased densities leading to new tensions (discussed below), but there is little certainty.
- 6.2.10 With regards, to the lower growth scenario, the assumption here (as set out in Section 5.5) is that the Local Plan would include a reduced emphasis on mixed use intensification of industrial sites / areas. The effect could be to avoid having to deal with challenges associated with integrating residential and industrial uses. However, there would also be an opportunity missed in terms of reconfiguring industrial uses and delivering new infrastructure, including road infrastructure, to address existing 'bad neighbour' issues.
- 6.2.11 In **conclusion**, there is support for the balance struck by the emerging proposed approach, and it is not possible to differentiate between the other two scenarios (lower and higher growth) with any confidence.
- 6.2.12 With regards to significant effects, after having taken account of the site allocations that are a constant across the growth scenarios, as well as those that are potentially a variable, it is fair to flag a positive effect on the baseline, but of 'limited or uncertain significance' ahead of giving detailed consideration to matters relating to masterplanning and wider development management.

Equality

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
		2

“Tackle poverty and social exclusion and promote equal opportunities”

6.2.13 The discussions presented above under both the ‘Homes’ and ‘Health’ heading are also relevant here. Clearly there are wide ranging benefits associated with growth that could potentially be discussed here, for example around delivering affordable housing, delivering new community infrastructure and delivering affordable workspace (recognising that demand for corporate office space and limited land availability can make it challenging for start-ups, smaller businesses and not-for-profit organisations to find workspace). In this light, there is a concern with the lower growth scenario. Not supporting targeted redevelopment / intensification of existing industrial sites would certainly lead to specific opportunities being missed.

6.2.14 However, given the scope of the alternative growth scenarios, there is also one specific matter for consideration here that serves as a possible argument in support of lower growth, at least in theory. This is the issue of supporting local employment opportunities within the existing industrial areas for those with lower skills who might otherwise be at risk of unemployment. However, in practice, concerns with mixed use intensification of industrial sites are uncertain, because there is little reason to assume a significant shift in the detailed makeup of the employment uses that can and will be accommodated at existing industrial sites post redevelopment. The intention is to support the existing uses as far as possible, but the possibility of some existing uses not being able to locate within an intensified site can be envisaged.

6.2.15 Having said this, with regards to the lower growth scenario, there is a need to recall that without a plan-led approach to redevelopment of these industrial sites, they could be at risk of piecemeal / less well planned redevelopment over time, with the eventual loss of current industrial (etc) uses.

6.2.16 In **conclusion**, the discussion above focuses on mixed use intensification of industrial sites. There is the potential to deliver benefits for new and existing communities, but there is a possible tension in respect of retaining employment opportunities suited to those with lower skills. In this light, it is considered appropriate to flag a concern with the highest growth scenario, as there would be an additional focus on homes possibly somewhat at the expense of a focus on industry. With regards to significant effects, after having taken account of the site allocations that are a constant across the scenarios (as well as those that are potentially a variable), it is fair to predict a positive effect on the baseline, but of ‘limited or uncertain significance’.

N.B. estate renewal is another important equalities-related consideration for the Local Plan. However, the firm assumption is that the emerging proposed approach is held constant across the alternative scenarios, i.e. support for new homes via estate renewal is not a variable across the scenarios. Furthermore, another relevant consideration is air quality, recognising that this is an issue felt disproportionately by some groups.

Amenity

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
2		2

“Improve amenity by minimising the impacts associated with development”

6.2.17 The discussion presented above under the ‘Health’ heading is highly relevant here. Indeed, it is difficult to identify additional issues/opportunities for discussion under this heading.

6.2.18 Focusing on the specific matter of potentially needing to support higher density development under a higher growth scenario, there would be a clear ‘Amenity’ concern if this were to involve a step-change across swathes of the Borough. This is because higher density development can give rise to amenity issues for new and existing residents and others making use of the public realm, e.g. in terms of shading. This can be a particular issue in Camden given the relatively low rise character of much of the Borough.

6.2.19 However, the higher growth scenario that is a focus of appraisal here does not assume any such step change. Rather, the assumption is that any boosts to density would be targeted and quite modest.

6.2.20 In **conclusion**, on balance it is considered appropriate to place the scenarios in an order of preference as per the approach taken under 'Health', although in this instance it is difficult to suggest significant effects.

Open space

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
2	1	1

"Conserve and improve open space provision"

6.2.21 A primary consideration here is support for redevelopment of existing sites that currently do not provide any open space to the benefit of local communities, recognising that redevelopment will provide an opportunity to deliver new open space. In this light, the lower growth scenario is not supported. There are significant opportunities to deliver new open space at all of the industrial sites proposed for intensification.

6.2.22 With regards to differentiating between the other two scenarios, higher density development could lead to challenges around delivering open space, but there is little reason to suggest this is a significant concern, given the assumption here of a relatively modest higher growth scenario.

6.2.23 Another point to note is that none of the three key non-permitted sites in the Camley Street area are directly adjacent to the Regents Canal. Also, with regards to Kentish Town, there are sensitivities associated with the proximity of Murphy Site to Parliament Hill (including the Lido at its southern extent); however, there are no concerns regarding direct impacts to the functioning of the open space (also, it is fair to highlight that proximity to a strategic open space serves as an argument in favour of maximising housing growth here).

6.2.24 In **conclusion**, the key consideration here is supporting mixed use intensification of industrial sites that will deliver new open space to the benefit of new and existing residents. New open space delivered would be of local significance, but overall fairly limited in the context of the Borough as a whole.

Biodiversity

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
1	1	2

"Protect and enhance existing habitats and biodiversity and to seek to increase these where possible"

6.2.25 It is inherently difficult to draw strong conclusions. This is because, on the one hand, development would be required to deliver urban greening and biodiversity net gain; but, on the other hand, intensification of sites could lead to pressure on existing onsite and adjacent / nearby areas of habitat, and it is important to ensure a focus on avoiding biodiversity impacts in the first instance.

6.2.26 Focusing on issues / sensitivities associated with the intensification of existing industrial sites, there is a need to highlight that the key sites in question are all adjacent to a railway line, and land alongside railway lines is often of significant biodiversity value in the London context (often designated as a Site of Importance for Nature Conservation, SINC). Perhaps most notably, in the Kentish Town area, the Murphy Site is associated with a significant area of woodland / mature vegetation alongside the railway lines adjacent to the north of the site, and it is also important to note the proximity of Parliament Hill, which is clearly a key component of the Boroughs ecological / green infrastructure network. Also, in the Camley Street area, there is a significant concentration of mature trees / vegetation associated with the railway line, as well as a notable density of mature trees interspersed within at least one of the key sites.

6.2.27 Also, it is noted that another of the sites flagged in Section 5 as potentially being associated with a choice in respect of the quantum of new homes supported (Shirley House, 25-27 Camden Road) is located adjacent to the Regents Canal; however, there is no significant bankside vegetation along this stretch of the canal.

6.2.28 In light of the above points, it is fair to flag a concern with the higher growth scenario, which could feasibly involve the need to compromise on biodiversity / green infrastructure objectives. However, this is highly uncertain, as design solutions could well serve to resolve biodiversity concerns, e.g. ensuring buffer strips between areas of (intensified) built form and areas of biodiversity value. Indeed, targeted new green infrastructure within development sites could support the functioning of adjacent areas of biodiversity value.

6.2.29 With regards to the lower growth scenario, this could feasibly leave the door open to future biodiversity focused interventions. However, the more likely scenario is that the sites in question come under pressure for redevelopment in time, and that this happens without due strategic consideration given to biodiversity.

6.2.30 In **conclusion**, it is fair to flag a concern with the higher growth scenario, but this is marginal. Significant effects are not predicted, assuming design solutions focused on addressing biodiversity concerns. With regards to realising biodiversity opportunities, this could warrant further work ahead of plan finalisation.

Air quality

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
2	★ 1	★ 1

“Improve local air quality and limit exposure”

6.2.31 Poor air quality is a widespread issue, with a blanket Air Quality Management Area (AQMA) covering the entirety of the Borough, but there are also known and likely hotspot areas, particularly along the main roads but also other areas with high traffic flows and/or limitations to the circulation of air, along with the presence of sensitive receptors. The figure below, which is taken from the SA Scoping Report, shows the strategic road network in the Borough, including TFL Red Routes (which make up 5% of London’s roads, but carry up to 30% of the city’s traffic), alongside six locally designated Air Quality Focus Areas. It is also important to recognise that noise pollution is a closely related consideration, and that noise pollution is also associated with sources other than main road, perhaps most notably railway lines.

Figure 6.1: Air Quality Focus Areas



6.2.32 However, it is difficult to differentiate between the alternative growth scenarios. Considerations include:

- There are few concerns regarding higher growth leading to increased traffic on an already very congested road network. This is because the Local Plan is set to require that all new development is car free, recognising high Public Transport Accessibility Levels (PTAL) and good potential for active travel. Of the key industrial sites under consideration, the Camley Street area benefits from particularly high PTAL.
- The fact that the Borough can require car free development is an argument in favour of higher growth.
- However, there is also a need to consider the construction stage of development, which can be associated with significant localised air (and noise) pollution.
- Another consideration is around the opportunity to rationalise existing traffic movements associated with industrial sites. However, there is uncertainty regarding precisely what can be achieved.
- There is also a general issue around air and noise pollution associated with industrial and logistics uses, including associated HGV and van movements. This has already been discussed above, under 'Health'.
- Delivering new homes at current industrial sites adjacent to railways is a further consideration, from a noise pollution perspective. However, the reality is that this is common practice across London, and there is good potential to mitigate noise pollution concerns, including through design measures.
- Finally, there is potentially a need to consider the balance between residential uses and office floorspace, as offices can generate car movements. However, key office locations in the Borough are associated with very high PTAL, e.g. with much of South Camden rated 6b, which is the highest rating.

6.2.33 In **conclusion**, whilst it is difficult to differentiate between the alternatives, a key consideration is judged to be around ensuring the optimal use of land in Camden for development, recognising that key growth locations perform very well in terms of accessibility and the potential to reach key destinations by walking, cycling and public transport. In turn, it is appropriate to flag a concern with the lower growth scenario, which could represent an opportunity missed, when considering air quality from a larger-than-local perspective. However, significant negative effects are not predicted. The next London Plan (for which the timetable is uncertain) will be well-placed to direct housing growth to areas with strong accessibility / transport connectivity credentials and/or where there is the potential for strategic growth to bring with it investment in transport infrastructure / services. In turn, it will be well placed to minimise air quality concerns with growth.

Energy and resources

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
2	★ 1	★ 1

"Promote efficient use of energy, water and other natural resources, throughout the life of the development"

6.2.34 The discussion under this heading is an opportunity to focus on the question of minimising per capita greenhouse gas emissions from the built environment. In particular, a focus of discussion here is in respect of the potential for each of the scenarios to support 'net zero carbon developments'.

6.2.35 Larger developments can give rise to an opportunity over-and-above smaller developments, given economies of scale and also potential to deliver a good mix of uses onsite, which can feasibly support a heat network. Also, large sites will generate a high degree of attention and scrutiny (including at the masterplanning stage, which is a key stage for realising built environment decarbonisation opportunities), and developers will often be keen to demonstrate good practice or even exemplar development. However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because large sites can face abnormal costs that create viability challenges. Also, heat networks are technically challenging to deliver, and practice is not well advanced nationally, with a clear opportunity currently only existing where there is very high density development, a good mix of uses and a source of available waste or ambient heat.

6.2.36 Another important consideration is around ensuring that 'net zero development' is carefully defined:

- Firstly, any approach to net zero development must align with the energy hierarchy, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort.

- Secondly, there are two broad approaches to calculating and monitoring / evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an energy-based approach. The two approaches are compared and contrasted in a recent report [here](#).¹¹
- Thirdly, it is important to be clear that the focus of discussion above is in respect of 'operational' energy/carbon, i.e. the energy used / carbon emitted as a result of the development's use. There is also a need to consider 'whole life cycle' emissions, to include to the emissions associated with construction, maintenance, retrofitting and demolition. This is considered a key issue locally and across London.

6.2.37 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong viability, with a view to ensuring funding for decarbonisation measures (recognising that there are inevitably competing funding priorities, including affordable housing).

6.2.38 With regards to differentiating between the growth scenarios, considerations include:

- There is strong support for mixed use intensification of existing industrial sites, from a built environment decarbonisation perspective. Potential to deliver heat networks should be explored.
- Displacing industrial and warehousing / logistics uses from Inner London and potentially from London as a whole can lead to increased HGV and van travel distances. However, it is difficult to suggest that this is a significant concern, including as the aim is to accommodate existing uses post redevelopment.
- At none of the key sites in question is it known to be the case that higher density would be supportive of development viability to the extent that there could be additional built environment decarbonisation opportunity. It is also noted that taller buildings lead to less roof space per dwelling for solar panels.
- Mixed use developments comprising both homes and office space within the same building can give rise to an opportunity to deliver a heat network / share heating and cooling infrastructure. However, any shift to the balance between homes and offices under a higher growth scenario would be modest, with little reason to suggest that the outcome would be residential-only schemes, in place of mixed use schemes.
- Promoting the reuse of existing buildings instead of demolition and rebuild is a key consideration for the Local Plan. The higher growth scenario could potentially mean increased pressure to demolish buildings that might otherwise have been reused, but it is not clear that this is a significant consideration.

6.2.39 In **conclusion**, it is certainly not considered appropriate to favour the lower growth scenario, because there is strong support for mixed use intensification of industrial sites from a built environment decarbonisation perspective. It is then not possible to differentiate between the other two scenarios with any confidence. There should be ongoing scrutiny of development densities and use mixes across all the Local Plan allocations with a view to maximising the potential to secure net zero development (onsite if possible).

6.2.40 With regards to significant effects, whilst all scenarios would likely see an improvement on the baseline, there is a need to reach conclusions taking account of established objectives and targets, in particular the Borough's 2030 [net zero target](#). In this light, there is a high bar to reach before predicting positive effects of any significance. It may be possible to predict significant positive effects at the next stage; however, at this current stage, there is insufficient evidence of built environment decarbonisation being integrated as a key factor with a bearing on spatial strategy to an extent that reflects the urgency of the issue. There is a need for further work to explore spatial strategy, site and scheme-specific decarbonisation opportunities.

Water

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
=	=	=

"Protect and manage water resources (including groundwater)"

6.2.41 It is difficult to meaningfully differentiate between the growth scenarios in terms of 'Water' objectives (noting that flood risk is more appropriately considered under the 'Resilience' heading below).

¹¹ Under the Building Regulations methodology the question for any given planning application is the extent to which the development can exceed the regulatory requirement, measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh/m²/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter.

- 6.2.42 Protecting sensitive ground water is an important consideration in parts of the Borough, recognising that groundwater can be impacted by activities including ground source heat pumps, piling and basement excavations. However, it is not possible to differentiate between the growth scenarios in this respect.
- 6.2.43 Ensuring high quality Sustainable Drainage Systems (SuDS) is an important policy consideration for the Local Plan, including with a view to protecting groundwater, however, there is no reason to suggest that modestly higher density developments would lead to a challenge in this respect. Equally, there is little reason to suggest support for redevelopment of existing industrial land with a view to delivering new SuDS is a significant consideration locally.
- 6.2.44 Other considerations for Local Plans can relate to supply of potable water supply, low water levels affecting the natural environment and wastewater treatment (in terms of capacity of the works and also the capacity of water bodies to receive treated water), but there are no particular concerns in the Camden context. London is a water stressed area, but higher growth in Camden would not necessarily result in higher growth across London as a whole. It is also important to recognise that new development is an opportunity to design-in measures aimed at water efficiency.
- 6.2.45 In **conclusion**, the alternatives are judged to perform on a par and significant effects are not predicted. To reiterate, the aim here is to focus on sites / spatial strategy with minimal assumptions around DM policy.

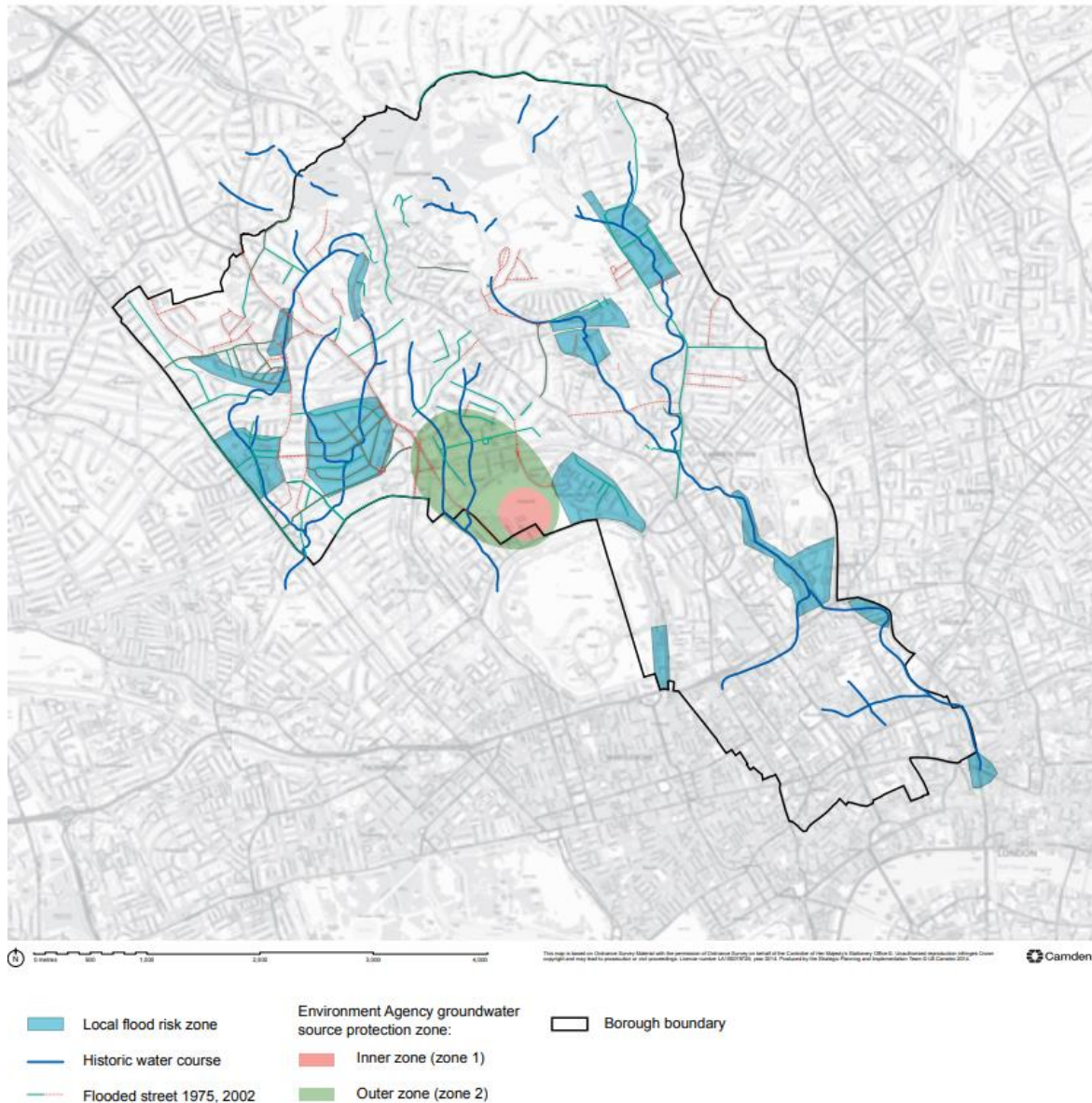
Resilience

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
=	=	=

“Ensure our buildings and environment can adapt to a changing climate”

- 6.2.46 A key climate change adaptation / resilience for many Local Plans is flood risk, and this is an important consideration for the Camden Local Plan, albeit the Borough is not affected by fluvial (river) flood risk, because historic rivers (including the Fleet and the Tyburn) were culverted in the 19th century and now form part of the Thames Water drainage network. The entire Borough is located in fluvial flood risk zone 1.
- 6.2.47 However, the Environment Agencies national flood risk map shows that surface water flood risk is an issue, with risk correlating with topography and, in turn, the former courses of rivers – see Figure 6.2. There is a correlation between the Borough’s remaining large industrial areas and surface water flood risk zones / the course of former rivers, which is unsurprising, as industry has historically located close to railways and canals and, in turn, along valleys (also, the location of industry may to some extent pre-date the culverting of rivers). In particular, there appears to be a surface water flood risk channel associated with St Pancras Way, plus there is a degree of surface water flood risk affecting the Regis Road site in Kentish Town (somewhat associated with pooling caused by the railway embankment). However, this flood risk is unlikely to be a barrier to achieving modest higher densities, and certainly would not be a barrier to achieving a modest shift in the use mix of any redevelopment (towards greater support for new homes), given good potential to address surface water flood risk through SuDS and other masterplanning and design measures.
- 6.2.48 Aside from flood risk, a key climate change adaptation for the Borough is masterplanning and designing the built environment with future overheating risk in mind, given the likelihood of more frequent, more extreme and more prolonged heat waves under climate change scenarios. There are implications for the public realm, with a need to support green space and other components of an integrated green and blue infrastructure network, in order to provide shading and cooler spaces for people to spend time whilst outdoors. Also, there is a need to ensure that overheating risk within buildings is a key design consideration, in line with London Plan Policy SI4 (Managing heat risk). The London Borough of Newham recently published a detailed [evidence base report](#) on this topic in support of the emerging Local Plan.
- 6.2.49 Ultimately, masterplanning and designing for overheating risk does have viability implications and is a factor in support of comprehensive / larger-scale redevelopment (e.g. masterplanned redevelopment of larger industrial areas, rather than more piecemeal development over time). However, it is difficult to conclude that this is a significant consideration that enables meaningful differentiation between the growth scenarios.
- 6.2.50 In **conclusion**, the alternatives are judged to perform on a par and significant effects are not predicted, although this is pending further consultation with the Environment Agency.

Figure 6.2: Flood risk, historic flooding events and an area of groundwater sensitivity



Design

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
2	★ 1	★ 1

“Promote high quality and sustainable urban design”

6.2.51 The focus of discussion here is on the question of ‘high quality’ design, recognising that key matters relating to ‘sustainable’ design have already been discussed above, including in respect of climate change mitigation, climate change adaptation, sustainable drainage and water efficiency.

6.2.52 A key point to note here is that certain of the key sites in question are large sites that are well-suited to a masterplanned and design-led approach to redevelopment focused on place-making, and that current industrial uses contribute little to local character or may be a detractor. There is little reason to suggest that the potential to achieve benefits would be significantly limited under a modest higher growth scenario.

6.2.53 There are also further and wide-ranging design considerations that warrant being a focus of development management policy (both Borough-wide and area / site-specific); however, there is no potential to meaningfully differentiate between the alternatives in these respects.

6.2.54 In **conclusion**, the lower growth scenario could lead to an opportunity missed, but it is fair to predict a positive effect of 'limited or uncertain significance' for all of the scenarios after having accounted for site allocations that are a constant across the scenarios.

Historic environment

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
★ 1	★ 1	2

"Protect and enhance the historic environment"

6.2.55 The historic environment is a key constraint to growth locally and, in turn, a key consideration for this current appraisal of growth scenarios. The Camden Housing Delivery Action Plan (2022) notably explains:

"The cumulative impact of historic and environmental development considerations in Camden has an impact not only on the total number of development sites likely to come forward but also on options for their potential redevelopment. The Council knows that sites in the borough need to work harder in terms of delivering more but this needs to be balanced against safeguarding the amenity of residents; the environment; heritage and other characteristics that make a place special."

6.2.56 Of the two broad considerations that are a 'variable' across the growth scenarios, namely development density and use mix within individual development sites, it is clearly the former that has greatest implications for the historic environment. Briefly recapping on the approach to defining scenarios:

- Conservation area designations are given close consideration within Section 5.4, as part of work to identify proposed site allocations that might be suited to delivering a quantum of new homes over-and-above the emerging proposed approach ('boosting housing supply').
- However, it is recognised that development outside of conservation areas can result in historic environment impacts in the Camden context.
- Whilst the scenarios are not defined with any precision, attention focuses on the approach to mixed use intensification of the Boroughs main industrial areas at in Kentish Town and in the Camley Street area.

6.2.57 Having made these initial points, key considerations for the current appraisal include:

- Viewing corridors set out in the London View Management Framework (LVMF) SPG intersect a number of the proposed allocations, including key sites that are potentially a variable across the growth scenarios. It is not the aim of this current appraisal to focus on development management policy; however, it is important to note that site specific policy is proposed for all sites intersecting a viewing corridor. For example, in the case of 104 – 114 Camley Street, which is the largest of the non-permitted industrial sites proposed for allocation in the Camley Street area, proposed policy states: *"The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 15m to 62m outside the LVMF viewing corridor and 15m – 45m inside... considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies."*
- Building heights at the northern extent of Murphy Site are constrained by the proximity of Parliament Hill (not a Registered Park and Garden, but of historic value), and also the proximity of a Grade II listed lido.
- The next matter for consideration is then potentially modest clusters of Grade II listed buildings located in proximity to Regis Road and at the western extent of the Camley Street area. However, there is little reason to assume any particular concerns (with modest higher densities), given the potential to avoid/mitigate impacts through development management, including in respect of access arrangements.
- Another consideration is the Regents Canal, which runs adjacent to the east of the Camley Street industrial area; however, site allocations directly adjacent to the canal are already permitted (such that there is limited potential to intervene through the Local Plan, in terms of site capacity or use mix).


- Another site flagged in Section 5 as potentially being associated with a choice in respect of the quantum of new homes supported (Shirley House, 25-27 Camden Road) is located within a conservation area and adjacent to the Regents Canal, including a Grade II listed road bridge. However, it is difficult to envisage any significant concerns (around a possible modest boost to density), including because the site is located at the junction of two busy roads.
- There is also a need to recognise that Victorian and early 20th Century industrial heritage is increasingly valued (e.g. see discussion of Land at Pakenham Street, under the ‘South’ sub-heading within Section 5.4). However, this is not thought to be a significant constraint to potentially boosting housing supply across the particular site allocations in question, nor is it thought to amount to a significant argument in support of not supporting mix use intensification at the sites in question.

6.2.58 The above bullet points focus on the question of development density, but there is also a need to consider possible implications of a modest shift in the use mix supported as part of mixed-use intensification at industrial sites, specifically a modest shift towards greater support for new homes. It is difficult to pinpoint specific implications, but there could potentially be a boost to development viability that leads to greater potential to implement measures aimed at achieving high quality design.

6.2.59 Finally, there is the question of ensuring a good balance between new homes and office floorspace (this is discussed in Section 5, as a possibly policy area for consideration as part of efforts to boost housing supply). In this respect, one point to note is that parts of the Borough are associated with concentrations of historic townhouses that have been used for office space for many years, and there may be a trend towards conversion back to residential. However, it is difficult to suggest implications for the current appraisal.

6.2.60 In **conclusion**, given the sensitive Camden context it is considered appropriate to flag a significant concern with the higher growth scenario, albeit this is highly uncertain without knowing more precisely how higher growth (specifically, a boost to the number of new homes provided) for would be achieved. With regards to the other two scenarios, it is recognised that a significant proportion of the ‘constant’ site allocations discussed in Section 5 are located in conservation areas or otherwise in locations associated with a degree of historic environment sensitivity (including some that are non-permitted). However, the overriding consideration is that the site capacities have been defined taking careful account of historic environment constraints. In this light, it is not clear that there is a risk of significant negative effects. However, there will be a need to revisit conclusions in the light of comments received from Historic England.

Land

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
3	2	

“Ensure new development makes efficient use of land, buildings and infrastructure”

6.2.61 Under this heading there is a clear need to flag a degree of support for the higher growth scenario. It is not necessarily the case that additional homes under the higher growth scenario would be achieved through higher density developments (rather, there could be a shift in policy around use mix); however, it is fair to assume here that there would be a degree of support for ‘boosting’ development density, which can arguably amount to a more efficient use of land.

6.2.62 Equally, there is a clear need to flag a concern with the lower growth scenario, which would broadly involve a continuation of the current policy approach to protecting industrial land, i.e. reduced support for mixed use intensification. Assuming that mixed use intensification is successful, particularly in terms of enabling continued operation of industrial uses as per the design intent, then it represents an efficient use of land.

6.2.63 A further consideration is the emerging proposed policy approach of prioritising the re-use of buildings over demolition, which will impact on how land is used moving forward. However, it is difficult to meaningfully differentiate between the alternatives in this respect (also see discussion under ‘Energy and resources’).

6.2.64 In **conclusion**, there is a clear order of preference. With regards to significant effects, spatial strategy / site selection and work to define site capacities and use mix in the Camden context is strongly focused on making efficient use of land, and not intensifying industrial land could conflict significantly with this objective.

Economy and employment

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
2	★ 1	2

“Encourage and accommodate sustainable economic growth and employment opportunities”

6.2.65 This is a key sustainability topic given the scope of the alternative growth scenarios. Taking matters in turn:

- Industrial land – the Employment Needs Assessment (ENA, 2023) finds that the requirement for industrial land in the Borough over the plan period is slightly below the existing stock (see Box 5.1). However, industrial land supply is widely considered to be an issue across London, and in Inner London in particular. In this light, there is clear support for re-providing land for industrial uses in full as part of mixed use intensification of existing industrial sites. There could potentially be some shift in terms of the particular types of industrial uses that can be supported following intensification (i.e. heavier versus lighter industrial uses, also mindful of warehousing and logistics / distribution uses), but this would likely be modest, and it is not clear that there would be significant implications in terms of the health of the local or wider economy (N.B. also see discussion under ‘Equality’, regarding implications for local employment opportunities).

In light of the discussion above, there is support for the emerging proposed approach, which aims to intensify employment uses within existing industrial sites. The lower growth scenario would lead to an opportunity missed, in this respect, whilst the higher growth scenario could risk tension between residential uses and industrial operations post redevelopment / intensification.

- Offices – in light of the evidence provided by Employment Needs Assessment (ENA, 2023) it is understood that the effect of the emerging proposed approach will be to broadly provide for needs / market demand. As such, there are concerns with both the lower growth scenario (mixed use intensification of existing industrial sites would include new office space, with the Camley Street area in particular benefiting from a location adjacent to Kings Cross, which is the focal point of the Knowledge Quarter) and the higher growth scenario (which could lead to pressure for new homes in place of office floorspace as part of mixed use developments, and feasibly even residential only schemes instead of mixed use schemes). However, concerns are fairly modest, and there is naturally an element of uncertainty around future market demand.

6.2.66 In **conclusion**, there is clear support for the emerging proposed approach. However, there remain potential tensions with economy / employment objectives that warrant ongoing scrutiny (particularly around continued operation of current industrial uses post intensification). It is also recognised that there is a high level argument for delivering new homes locally in support of the local economy, but this is a matter that is a focus of the appraisal above, under the ‘Homes’ topic heading.

6.2.67 With regards to significant effects, there could be a risk of not providing for established employment needs under the two worse performing scenarios, but this is very uncertain.

Centres

Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
=	=	=

“Ensure designated centres remain sustainable and adaptable for the future”

6.2.68 In light of the discussion in Section 5, there is little reason to suggest that the alternative growth scenarios will have significant implications for any of the Borough’s town centres. Camden Goods Yard, at the northern extent of Camden Town, is discussed in Section 5 as an area where there are some notable non-permitted proposed site allocations; however, the conclusion reached is that there is limited or no potential to boost housing supply at these sites. Another consideration is the close links between Murphy Site and (in particular) Regis Road with Kentish Town, and it is likely to be the case that redevelopment of these sites delivers positive benefits for the town centre, but benefits is likely to be fairly limited significance.

6.2.69 In **conclusion**, the alternatives are judged to perform on a par and significant effects are not predicted. With regards to significant effects, it is fair to predict a 'limited or uncertain' positive effect for all of the scenarios after having accounted for all of the underpinning site allocations. The new Local Plan has a clear 'place-based' focus, as part of which there is a focus on the potential for growth to support centres.

Appraisal conclusion

6.2.70 Table 6.1 presents a summary of the appraisal above. The table aims to **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence, and "?" used where there is fundamental uncertainty at this stage); and then **2)** categorise performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.¹⁰

Table 6.1: The reasonable alternative growth scenarios – summary appraisal findings

Sustainability topic	Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
Homes	3	2	1★
Health	2	1★	2
Equality	1★	1★	2
Amenity	2	1★	2
Open space	2	1★	1★
Biodiversity	1★	1★	2
Air quality	2	1★	1★
Energy and resources	2	1★	1★
Water	=	=	=
Resilience	=	=	=
Design	2	1★	1★
Historic environment	1★	1★	2
Land	3	2	1★
Economy & employment	2	1★	2
Centres	=	=	=

6.2.71 The appraisal arguably serves to suggest that **lower growth** performs quite poorly overall. Under this scenario the assumption is that a business as usual approach is taken to protecting industrial land, such that there would be a reduced focus on mixed-use intensification of existing industrial sites. The appraisal finds Scenario 1 to perform well in terms of three topics, but in each case this conclusion is fairly marginal.

6.2.72 With regards to the other two scenarios, namely the **emerging proposed approach** versus **higher growth**, matters are finely balanced, with each scenario associated with pros and cons. These must be 'weighed in the balance' in order to arrive at a conclusion on which of these scenarios best represents sustainable development, and this step is beyond the scope of SA (but see discussion in Section 7).

6.2.73 Focusing on the emerging proposed approach, there is broad support across the majority of SA topic headings (in terms of which it is possible to differentiate between the alternatives), but there is a drawback relative to the higher growth scenario in respect of providing for housing needs. It is recognised that the London Plan is supportive of taking a capacity-led approach to providing for housing needs (post 2029), and that the next London Plan will be well placed to provide for housing needs across London; however, the timetable for the new London Plan is uncertain. As such, there is a clear need to take a suitably proactive approach to housing land supply through the Local Plan recognising that the Borough is one of the least affordable places to live in the Country.

6.2.74 However, potential concerns with higher growth relate to:

- Health and amenity– higher density developments could lead to a need to compromise on open space and other place-making objectives.
- Equality -the appraisal flags a concern with the types of employment opportunities that will be available at intensified employment sites relative to the current situation, and this could be exacerbated under a higher growth scenario, as it could be more a challenge to accommodate certain industrial uses.
- Biodiversity – higher density development could potentially create challenges in respect of achieving biodiversity net gain, noting that some of the key sites in question are associated with a degree of onsite or adjacent biodiversity sensitivity.
- The historic environment – this is a key constraint to higher growth in the Camden context; however, there is often potential to avoid or suitably mitigate historic environment impacts associated with development. There will be a need for further work including in consultation with Historic England.
- Economy and employment – under a higher growth scenario the assumption is that there could be a degree of pressure to deliver new homes in place of office space, plus there could potentially be some added concerns around the potential to achieve successful intensification of existing industrial sites.

7 The preferred approach

7.1.1 The following text was provided by Council officers in response to the appraisal:

"The emerging proposed approach to housing supply is the outcome of a number of years of work, and there are now limited options for boosting housing supply, because many of the key site allocations have planning permission and others are the focus of adopted Development Frameworks and/or Neighbourhood Plans. Nonetheless, it has been a useful exercise to systematically consider options and, in particular, the three reasonable alternative growth scenarios that are a focus of the appraisal table above.

The appraisal shows the emerging proposed approach to perform well relative to the alternatives in wide-ranging respects, although there are clear limitations relative to the higher growth scenario in terms of objectives relating to meeting housing needs.

Officers believe that the emerging proposed approach strikes an appropriate balance between competing sustainability objectives, with 'boosting housing supply' continuing to be an ongoing consideration for the Council when determining planning applications, and recognising that a new London Plan will be well placed to take a strategic approach to meeting housing needs.

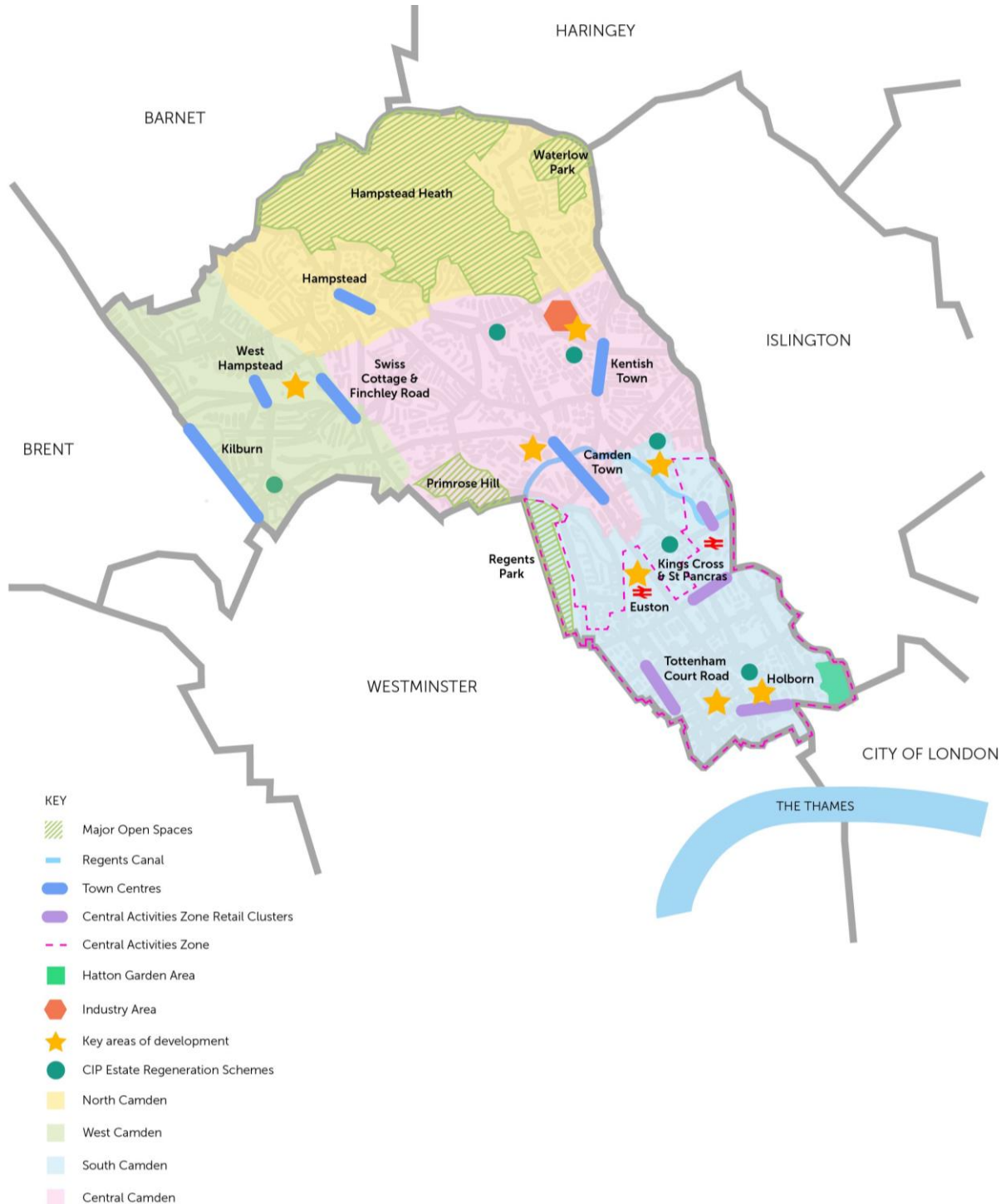
However, it is recognised that housing needs are acute across the Borough and, in turn, boosting supply could be a matter for further consideration prior to plan finalisation, informed by consultation responses."

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal the current Draft Local Plan (as a whole).

Figure 8.1: The Local Plan key diagram



Appraisal methodology

8.1.2 Appraisal findings are presented across 15 sections below, with each section dealing with a specific sustainability topic. For each topic the aim is to discuss the merits of the emerging plan as whole, before reaching an overall conclusion on significant effects. Specifically, the regulatory requirement is to “identify, describe and evaluate” significant effects taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. ‘long term’. Also, significant effects are defined as follows:

- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan.
 - The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. the 2030 net zero target).
- 8.1.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the emerging plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented and the effect on key 'receptors'.

9 Appraisal of the Draft Local Plan

9.1 Introduction

- 9.1.1 The appraisal is presented under the 15 topic headings that together comprise the core of the SA framework (see Section 3). Under heading the aim is to:
- Discuss the spatial strategy (elaborating on the appraisal of growth scenarios in Section 6);
N.B. see the **Appendix II** for an appraisal of all site allocations.
 - Discuss development management policy; and then
 - Conclude on significant effects in respect of the Draft Local Plan as a whole.

Homes

- 9.1.2 *"Promote the provision of a range of high quality and affordable housing to meet local needs"*

Spatial strategy

- 9.1.3 The appraisal in Section 6 flags a concern with the proposed strategy, because housing needs will not be met. However, the reality is that capacity to deliver new homes in the Borough is very limited and, in this context, there is support for the approach proposed in the Draft Local Plan. Specifically, there is support for taking a strategic approach to optimising the use of land, with self-contained new homes as the priority use.
- 9.1.4 Only three allocations have no housing capacity, and only one of these is non-permitted, namely 134 – 149 Shaftesbury Avenue, which is allocated for cinema / theatre use.
- 9.1.5 A further issue is meeting the needs of specific groups for affordable housing that meets their support needs. Work has been undertaken since the adoption of the Local Plan, and larger sites considered suitable to meet particular housing needs have been identified. Two of these are already permitted (Juniper Crescent and O2 Centre), but one is not, namely Murphy Site in Kentish Town. The proposal here is to encourage the inclusion of supported affordable housing for older or vulnerable people.
- 9.1.6 With regards to providing for the accommodation needs of Gypsies and Travellers, an accommodation assessment undertaken in 2014 indicated that 16 additional pitches will be required for Camden's established traveller community by 2031. However, the assessment is now out-of-date, and the Council is aware that the GLA are currently carrying out a London-wide Gypsy and Traveller Accommodation Assessment. This work will provide an updated needs assessment for Camden.

Draft policies

- 9.1.7 Key policies that are broadly supportive of homes / housing objectives include:
- H1 (Maximising housing supply) – sets out the Council's strategy for maximising housing supply to deliver the identified target of 11,550 additional homes (770 homes per year) over the plan period to 2041.
 - H2 (Maximising the supply of self-contained housing from mixed use schemes) – applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase in the defined South sub-area and the town centres of Camden Town and Finchley Road/ Swiss Cottage.

- H3 (Protecting existing homes) – seeks to protect all residential floorspace where people live long-term. It also seeks to protect individual self-contained houses and flats (in Use Class C3) and individual houses and flats shared by 3 to 6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, Use Class C4).
- H4 (Maximising the supply of affordable housing) – supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable, meeting the needs of households unable to access market housing. The aim is to meet or exceed a borough-wide strategic target of 3,000 additional affordable homes from 2026/27 - 2040/41 and achieve an appropriate mix of affordable housing types.

This is clearly a key policy with regards to achievement of homes / housing objectives. The proposal is for affordable housing to be a priority when considering whole plan viability; however, there is also a need to balance other policy requirements that impose a cost on development, including around net zero.

- H5 (Protecting and improving affordable housing) – aims to protect all affordable housing floorspace in the broad sense of housing that is provided at less than market costs, whether the reduced cost arises from the nature of the homes, the occupants, or the providers, or a formal affordable housing designation.

It seeks particularly to protect: low-cost rented housing and intermediate housing managed by the Council, Housing Associations and other Registered Providers; key-worker accommodation, such as nurses' hostels; and other low cost housing provided in connection with a job, such as a caretaker's flat.

- H6 (Housing choice and mix) – aims to create “mixed, inclusive, sustainable and multi-generational” communities by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs.
- H7 (Large and small homes) – This policy seeks a mix of dwelling sizes to reflect the Camden Housing Needs Update, which indicates that: the greatest requirement in the market sector is for two- and three-bedroom homes, followed by one-bedroom homes/ studios; whilst the greatest requirement in the affordable sector is for two and three-bedroom homes followed by homes with four or more bedrooms.

It is important to be clear that there can be a tension between objectives around securing larger homes, in accordance with established needs, and maximising total supply of homes. This is recognised by the Camden Housing Delivery Action Plan (2023), which explains:

“In Camden we want to make sure that new homes being built in the borough address the needs of people who have less choice over housing options first. Affordable housing products, especially larger units, can have an influence on a scheme's viability and in certain situations, particularly on commercial schemes, the Council has sought a lower overall number of new homes on a site to secure a greater percentage of affordable units to better address the housing needs of local people.”

- H8 (Housing for older people, homeless people and other people with care or support requirements) – states that the Council will assist people within the specified groups to live as independently as possible by: encouraging adaptations that enable them to remain in their existing homes; supporting adaptation of existing specialised housing to meet contemporary needs; seeking a proportion of housing in larger housing developments to meet the specific needs of these groups; supporting development of a variety of specialised housing; and resisting the net loss of existing specialised housing floorspace.
- H9 (Student housing) – aims to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.
- H10 (Housing with shared facilities) – seeks to ensure continued provision of housing with shared facilities to meet the needs of small households with limited incomes and modest space requirements.
- H11 (Accommodation for travellers) – sets out the Council's approach to meeting the housing needs of gypsies and travellers in Camden. As discussed, there will be a need for further work prior to Reg 19.

9.1.8 As discussed in Section 5.2, Policy H2 is considered to be a policy of key strategic importance, and one for which there is a key decision to be made through the Local Plan – see Box 9.1.

Box 9.1: Further discussion of Policy H2 (Maximising... self-contained housing from mixed use schemes)

Policy H2 of the Camden Local Plan 2017 currently seeks 50% of additional floor area for self-contained housing where additional non-residential floor area is proposed, with an expectation that housing will be included on-site where proposals involve an additional floor area of 1,000 sqm GIA or more. Policy H2 currently applies to the Central London Area (within Camden, this matches the Central Activities Zone as identified by the London Plan 2021), and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road.

Over the last five years, several largely non-residential developments have been proposed on the northern fringes of the CAZ and the fringes of Camden Town beyond the geographical scope of current Policy H2. The number of these proposals suggests that the development industry may have identified an opportunity to bring forward CAZ developments on lower value sites and avoid the constraints of Policy H2.

The Council's locational policies do not provide a strong basis for resisting such non-residential proposals outside the CAZ where they come forward on existing employment sites, or on edge-of-centre-sites (for office purposes, the NPPF defines these as locations outside the town centre but within 500 metres of a public transport interchange). Given, this the Council has chosen to extend the geographical area covered by H2 to mitigate against the above issues and maximise the supply of housing in Camden.

- 9.1.9 Finally, there is a need to consider policies within the Draft Local Plan that lead to a tension with 'homes' objectives and that could potentially even generate a significant negative effect in isolation or in combination. In short, the answer is that many policies feasibly do generate a degree of tension, but there is little reason to conclude any significant concern. There are perhaps two broad categories of policy to consider: A) policies that are supportive of land uses other than housing; and B) policies that set requirements of developers that will lead to a cost and, in turn, lead to viability implications that could result in challenges bringing sites forward in such a way that aligns with policy objectives, including in respect of maximising the supply of housing (recognising that office space can be the market's preferred land use). Focusing on (A), attention potentially focuses on Policy IE2 (Offices), e.g. its requirement that: *"The loss of offices... will only be considered acceptable where... A comprehensive marketing campaign has been undertaken of at least 12 months..."* Also, there is a need to consider Policy IE3 (Industry), e.g. its requirement that, as part of intensified employment-led redevelopments of existing industrial land, there is a focus on: *"Prioritising the retention of existing businesses as far as possible."* With regards to (B), see the Viability Study (2023).

Conclusion

- 9.1.10 In conclusion, a key benefit of the Local Plan is the inclusion of site policies that seek to achieve the most efficient use of each site, accounting for any opportunities or constraints, and with housing as the priority land use. Equally, a key benefit of the Local Plan is development management policy aimed at securing a good housing mix, in terms of type, size and tenure, which will apply to all development proposals, i.e. both for proposed allocations and windfall sites. This includes Policy H2, which seeks to address an existing issue of development schemes coming forward in some parts of the Borough without any self-contained homes. Policy H4 on affordable housing is also crucially important, including in respect of meeting the housing needs of specific groups. Policies supportive of alternative land uses or with cost/viability implications potentially lead to a degree of tension with housing related objectives, recognising the extent of housing needs locally, but it is difficult to pinpoint / recommend specific changes that might be made, recognising the need for draft policies to strike a balance in light of wide ranging issues and objectives. On balance, therefore, it is considered appropriate to predict a **neutral effect**. Clearly the plan will result in an improvement on the baseline situation, but there is a need to reach conclusions on significant effects in light of established targets, including in respect of housing need. Whilst the plan aims to provide for 11,550 homes to 2041 and in doing so support a boost to housing delivery relative to recent rates, there are alternative higher target figures that might ideally be provided for, considering matters purely from a perspective of aiming to realise housing-related objectives.

Health

“Promote a healthy community”

Spatial strategy

- 9.1.11 The appraisal in Section 6 is strongly supportive of the proposed strategy, because it strikes a good balance between competing objectives, including around development density and place-making. However, the appraisal in Section 6 flags a residual concern regarding the strong focus on mixed use intensification of industrial sites. Moving forward, there will be a need for ongoing scrutiny of measures to avoid or mitigate potential concerns around noise pollution and road safety (associated with HGV / van movements).
- 9.1.12 Looking across the full suite of proposed allocations, many are required to improve the public realm, create healthy and active streets and/or increase permeability for pedestrians (and wider uses of the public realm). However, it is the case that most of the key sites in question are permitted (e.g. Belgrove House, where the requirement includes enhanced education and employment opportunities for the local community).
- 9.1.13 A further key consideration is health infrastructure. In West Camden, the O2 Centre development (including car park and car showrooms) will make provision for new public health facilities, public toilets, and free drinking water; and the need for public health facilities is highlighted in the local Neighbourhood Plan; however, this site is permitted (such that benefits cannot really be attributed to the Local Plan).
- 9.1.14 The site allocations for West Kentish Town and the Wendling Estate and St Stephen’s Close are also of note, in that an aim is to ensure development responds to the local priorities set out in the Gospel Oak and Haverstock Community Vision. This includes a requirement to actively improve health outcomes, including contributions towards local health infrastructure, and to ensure no net loss of provision of health and community facilities. There are key opportunities to improve permeability and support regeneration.
- 9.1.15 More generally, the site policies seek to address needs identified in Area Frameworks, Council Strategies, the Borough’s Infrastructure Study and the priorities of other external partners and key stakeholders.
- 9.1.16 A further important thematic consideration is support for active travel, which is an important determinant of health and well-being, as understood from the Camden Joint Strategic Needs Assessment. There have been improvements to Camden’s cycle lanes, however there are known issues in the north of the Borough, which could be explored in the development areas of Kentish Town and West Hampstead. Looking more widely across the Borough, there are a number of site allocations required to improve connections and permeability, and most other sites are required to enhance the local environment for walking and cycling:
- 120 -136 Camley Street, 104 – 114 Camley Street – contribute towards public realm and connectivity enhancement projects along Camley Street to strengthen it as a key route for cyclists and pedestrians.
 - Parcelforce and ATS Tyre Site – contribute towards the creation of a potential new canal crossing.
 - St Pancras Hospital – create new public routes for pedestrians and cyclists.
 - West Kentish Town and Wendling – improve local walking and cycling routes by providing a clear, safe and accessible route connecting Talacre Park with Queens Crescent, and explore the opportunity of providing a new route connecting Lismore Circus to St. Dominic’s Priory.
 - Regis Road and Murphy Site – significantly improve connections between the site and surrounding areas, including improvements /new cycling routes.
 - 369 – 377 Kentish Town Road – designed to facilitate the future delivery of an attractive pedestrian and cycle route to link Kentish Town Station to Hampstead Heath and connections to the Murphy site.
 - Morrison’s Supermarket, Juniper Crescent, Network Rail and Juniper Crescent – contribute towards the delivery of a new route for pedestrians and cyclists.
 - O2 Centre, car park, car showrooms, 14 Blackburn Road – an emphasis on creating a safe and welcoming environment for pedestrians and cyclists.
 - Tottenham Mews Day Hospital – provide a welcoming, spacious and safe pedestrian-cycling connection.

Draft policies

9.1.17 The current Draft Local Plan includes a discussion within its background text around the importance of integrating health objectives across the full suite of policies. This is reproduced in in Box 9.2.

Box 9.2: Integrating health objectives across the Local Plan (text taken from the current plan document)

“The Local Plan has a significant role to play in delivering the Council’s Health and Wellbeing Strategy. Health considerations are therefore integrated into all aspects of this Plan and many measures set out in other policies will play a part in promoting population health and wellbeing and addressing health inequalities, for example by:

- Promoting good quality, well designed, affordable and accessible housing (Policies D1, D3, H4 and H6) to reduce overcrowding, improve living conditions and support health and wellbeing.
- Requiring developments to contribute to the mitigation of and adaption to climate change, to reduce the impact of extreme weather events such as flooding and heatwaves on health (Policies CC1 – CC13).
- Ensuring that buildings and places are designed to promote healthy behaviours and be inclusive and accessible to support the needs of different groups in Camden (Policies DS1, D1 and SC1).
- ... social infrastructure to support communities, aid integration and reduce loneliness (Policy SC2).
- Promoting healthy lifestyles, increased physical activity and improved mental health through the design of new development (Policies DS1, SC1 and D1), the protection... and provision of new and enhanced open space, play and sports facilities (Policies SC2 and SC3) and investment in active travel (Policies T1 and T2).
- Ensuring that developments are designed to reduce crime and the fear of crime, and improve community safety (Policy A2)
- Promoting a stronger local economy, recognising the links between income and health (Policy IE1)
- Improving and creating better access to education, training and employment (Policy IE1)
- Supporting healthy eating by improving access to healthier food choices and increasing opportunities for food growing (Policies SC4 and IE7)
- Managing the impact of development on health (Policy SC1) and reducing exposure to poor air quality with the aim of improving health (Policy A3).”

9.1.18 Key policies that are broadly supportive of health objectives include:

- DS1 (Delivering healthy and sustainable development) – seeks to ensure that all development contributes to ‘Good Growth’, which is socially and economically inclusive and environmentally sustainable, in order to maximise community benefit, respond to the climate emergency, create stronger communities and deliver healthy places, both for existing communities and future generations. There is also a requirement for Health Impact Assessments (HIA) for major schemes, which is fairly standard practice, although there are good practice principles to consider regarding HIA approach and scope.
- SC1 (Improving health and wellbeing) – requires a focus on local issues relating to health and wellbeing at an early stage of the planning process in order to positively improve outcomes for all. The policy presents seven key thematic requirements (e.g. “... designed and constructed to meet the WELL Building Standard”). However, there is potentially scope for greater specificity, potentially to include an element of spatial specificity (without replicating discussion within the place-specific sections of the Local Plan).
- SC2 (Social and community infrastructure) – sets out the Council’s approach to the protection and provision of social and community infrastructure in Camden.
- SC4 (Community Food Growing) – seeks to support food growing, including community food growing, in Camden to ensure that residents have access to nutritious, affordable and sustainable food.
- SC6 (Public houses) – reflects understanding that pubs play an important community and cultural role. As places where people meet and gather, they support social wellbeing and community cohesion.
- A2 (Safety and security) – seeks to create a safe and secure environment and provide a sense of security for all users, including the most vulnerable, to support good health and wellbeing and promote inclusion. It also requires applicants to mitigate potential suicide risks associated with the built environment.
- A3 (Air quality) – supports the objectives of the Council’s Clean Air Strategy and requires all development to be at least air quality neutral in accordance with the London Plan and associated guidance. An air quality positive approach is encouraged.

- A4 (Noise and vibration) – seeks to ensure that noise and vibration is considered at the design stage of developments. As well as noise and vibration sensitive uses, existing noise generating uses (such as music venues, theatres and some employment uses) must not be unduly restricted through the introduction of nearby sensitive uses. There is also support for retrofitting measures, where appropriate.
- T1 (Safe, healthy and sustainable transport) – prioritises the delivery of safe, active, healthy, affordable, and sustainable transport in line with the Council’s Transport Strategy, Climate Action Plan and Clean Air Action Plan. The goal is to maximise health and well-being, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities.
- T2 (Prioritising walking, wheeling, and cycling) – promotes active travel by prioritising walking, wheeling, and cycling in the Borough, supportive of health and wellbeing and wide-ranging other objectives.
- IE7 (Hot food takeaways) – seeks to manage hot food takeaways based on local evidence and data.
- IE8 (Gambling uses) – seeks to limit further concentrations of gambling related uses due to the likelihood of gambling-related harm. These uses include betting shops, adult gaming centres and casinos.

9.1.19 In light of the above points, it is clearly the case that health is a key focus of draft policies. One specific recommendation is made, in respect of greater policy specificity, which warrants consideration ahead of Regulation 19, but it is difficult to pinpoint any key strategic policy choices / reasonable alternatives. In discussion with officers, the conclusion is that the need to reflect health objectives has not generated any key policy choices as part of the process of updating the Local Plan / preparing the new Local Plan.

9.1.20 Finally, there is a need to consider policies within the Draft Local Plan that lead to a tension with health objectives and that could potentially even generate a significant negative effect in isolation or in combination. Attention firstly focuses on the matter of supporting mixed use intensification of existing industrial sites, which has already been a focus of discussion above. Beyond this, one policy to note is H10 (Housing with shared facilities). These are an important form of housing that meets the needs of specific groups (as discussed), but there can be tensions with health-related objectives, both with a focus of occupants and also the local community (e.g. waste collection can become challenging). The policy requires that development “complies with any relevant standards for houses in multiple occupation.”

Conclusion

9.1.21 In conclusion, health and wellbeing is clearly a key focus of all aspects of the Local Plan including: spatial strategy / site selection; decision-making in respect of site capacity and use mix; and the proposed suite of development management policies. As such, it is fair to predict a **significant positive effect**. It is difficult to identify any strategic policy choice (i.e. options for significantly boosting the performance of the plan, in terms of health objectives); however, there will be a need for ongoing consideration of options, recognising that planning for good health in urban areas is a policy area high on the national agenda. It is important to ensure that issues are addressed / opportunities realised through the Local Plan as far as possible, as opposed to placing reliance on the development management / planning application stage.

Equality

“Tackle poverty and social exclusion and promote equal opportunities”

Spatial strategy

9.1.22 The appraisal in Section 6 is strongly supportive of the proposed strategy, recognising that there are wide ranging benefits associated with growth, for example around delivering affordable housing and delivering new community infrastructure. However, the appraisal in Section 6 flags a residual concern regarding the strong focus on mixed use intensification of industrial sites, given implications for existing industrial uses that likely provide employment opportunities for those with lower levels of skills who might otherwise be at risk of unemployment. Moving forward, there will be a need for ongoing scrutiny of the detailed mix of employment uses that can likely be accommodated within intensified industrial sites.

9.1.23 Estate renewal is another important equalities-related consideration for the Local Plan. However, the Local Plan does not seek to intervene to any significant extent. Rather, it sets out policy support to reflect decisions that have already been taken, with all the new homes anticipated to come forward through estate renewal already having planning permission.

Draft policies

9.1.24 Key policies that are broadly supportive of equality / equalities objectives include:

- DS1 (Delivering healthy and sustainable development), SC1 (Improving health and wellbeing) and SC2 (Social and Community Infrastructure) – which have already been discussed above, under ‘Health’.
- SC3 (Open space) – seeks to protect, enhance and improve access to Camden’s high-quality public open spaces, to promote health and well-being, enhance biodiversity and make space for nature within Camden. One notable focus of the policy is a requirement to “*safeguard open space on housing estates while allowing flexibility for the re-configuration of land uses [subject to specified criteria].*”
- IE1 (Growing a successful and inclusive economy) – aims to secure a strong, diverse, sustainable and inclusive economy in Camden, maximising opportunities for residents, businesses and voluntary sector to contribute to and share in the success of Camden’s economy. Specific requirements of note include:
 - Expect larger schemes to provide a range of unit sizes to include space available for smaller businesses.
 - Resist the loss of viable employment space where this offers lower cost or flexible space.
 - Seek to address barriers to work such as the provision of childcare facilities to support working families.
 - Require applications involving a loss of employment floorspace to make a financial contribution towards local skills, training, and employment initiatives.
- SC5 (Cultural facilities) – sets out the Council’s strategy for supporting cultural facilities in Camden, recognising that cultural facilities, such as museums, theatres, galleries, cinemas, live music, comedy, and dance contribute enormously to Camden’s attractiveness as a place to live, visit, work and study.

9.1.25 In light of the above points, it is clearly the case that equality is a key focus of draft policies. It will be important to take account of issues and opportunities raised through the consultation; however, at the current time, it is not possible to identify any strategic policy choices / reasonable alternatives that might be formally explored (with a view to improving the performance of the plan in terms of equality objectives).

9.1.26 Finally, there is a need to consider policies within the Draft Local Plan that lead to a tension with equality-related objectives and that could potentially even generate a significant negative effect in isolation or in combination. However, it is difficult to provide meaningful comment beyond that presented above under ‘Health’. With regards to climate change mitigation / decarbonisation focused policies, in the past there have been issues in London with heat networks (combined heat and power) leading to additional costs having to be born by residents; however, lessons have been learned and practice has improved, such that this is not expected to be an issue moving forward. The Government recently published an Equality Impact Assessment ([EqIA](#)) for its Heath and Buildings Strategy.

Conclusion

9.1.27 In conclusion, development supported through the Local Plan will lead to wide-ranging benefits – from affordable housing, to new jobs, to training and apprenticeships, community facilities and open spaces – and there are few identified tensions. The approach in the plan also focuses on designing places that reflect and celebrates Camden’s diversity and that are welcoming, inclusive and accessible to all to meet the needs of Camden’s diverse communities. However, the significance of benefits deriving from the local plan is limited, i.e. many key equalities-related issues and opportunities are largely outside the scope of the Local Plan to influence. There will be a need to further explore issues and opportunities ahead of plan finalisation, recognising that this will likely be a key topic that generates interest and comment through the current consultation. As such, a **‘limited or uncertain’ positive effect** is predicted at the current stage.

Amenity

“Improve amenity by minimising the impacts associated with development”

Spatial strategy

9.1.28 The appraisal in Section 6 is strongly supportive of the proposed strategy, reflecting the carefully considered approach to development densities, balancing the need to provide for development needs with a need to address wide ranging constraints including around protecting amenity.

9.1.29 Looking across the full suite of proposed allocations, many could potentially give rise to a degree of tension with amenity objectives. However, perhaps the primary consideration is cumulative impacts from development clusters, notably at Camden Goods Yard, Camley Street and St Pancras Way, Kentish Town, West Kentish Town, and West Hampstead. Certain of these are largely non-permitted, as discussed.

Draft policies

9.1.30 Key policies that are broadly supportive of amenity objectives include:

- A1 (Protecting amenity) – is clearly a key policy. It sets out the Council’s approach to protecting standards of amenity (the features of a place that contribute to its attractiveness and comfort), recognising that amenity contributes significantly to health and quality of life and is fundamental to Camden’s attractiveness and success. The policy considers the amenity of existing and future occupiers of development and nearby properties and take appropriate measures to mitigate potential impacts where necessary.
- A2 (Safety and security) – seeks to create a safe and secure environment and provide a sense of security for all users, including the most vulnerable, to support good health and wellbeing and promote inclusion.
- A3 (Air quality) and A4 (Noise and Vibration) – have already been discussed above, under ‘Health’.
- D6 (Basements) – seeks to control the development of basements to protect the amenity of neighbours.
- IE9 (Delivery led food businesses) – seeks to ensure that the impact of businesses is effectively managed.

9.1.31 In light of the above points, it is clearly the case that amenity is a key focus of draft policies. It will be important to take account of issues and opportunities raised through the consultation; however, at the current time it is not clear that any strategic policy choices / reasonable alternatives exist that might be formally explored (with a view to improving the performance of the plan in terms of amenity objectives).

9.1.32 Finally, there is a need to consider policies within the Draft Local Plan that lead to a tension with amenity-related objectives and that could potentially even generate a significant negative effect in isolation or in combination. Attention potentially focuses on Policy D2 (Tall Buildings); however, the key point to note (as discussed previously) is that any applications for tall buildings would need to be considered on their merits against a range of policy criteria at the planning application stage, including criteria relating to amenity.

Conclusion

9.1.33 In conclusion, whilst growth in the Camden context does inevitably give rise to tensions with objectives relating to amenity, the Local Plan sets out to avoid / minimise and mitigate tensions through site-specific and area-wide development management policy, and it is important to recall that the baseline situation is one whereby development comes forward but in a less well-planned way. As such, a **‘limited or uncertain’ positive effect** is predicted.

Open space

“Conserve and improve open space provision”

Spatial strategy

9.1.34 The appraisal in Section 6 is strongly supportive of the proposed strategy, recognising the potential to deliver new open space, including that which is of some strategic importance to the local area, benefiting both new and existing residents. It is important to recognise that there will be increasing pressure on open space from anticipated population growth in the Borough over the plan period.

9.1.35 There are a large number of sites which include requirements to enhance, and in some cases increase, open space, including in areas where there is a known local need. The Camden Open Space, Sport and Recreation Study (2014) identified local need for open space in: parts of the north west of the Borough, around west and south Hampstead; around key transport corridors such as Kentish Town, Gospel Oak, and Camden Town; within the Central Activities Zone, and south of the Euston Road.

9.1.36 There is also the closely related consideration of access to nature, which is a particular issue in South Camden, e.g. there are only eight Local SINC’s south of the Euston Road. The Camden Biodiversity Strategy notes there are areas within Camden where residents lack sufficient access to the natural environment, defined as more than 1km walking distance from a publicly accessible SINC.

9.1.37 Looking across the suite of proposed allocations (including permitted sites), key sites include:

- Morrisons Supermarket – a range of open spaces and community facilities. Open space should include areas for wildlife and the creation of green routes along the railway edges.
- 120 – 136 Camley Street, and Parcelforce and ATS Tyre Site – provision of a new public space.
- Regis Road and Homes Road Depot – substantial new open spaces and look to provide a new square.
- Murphy Site – provide substantial new public open space.
- O2 Centre, car park, car showrooms, and 14 Blackburn Road – improved and new public realm, public and green spaces of different forms and functions related to the location and key uses and activities.
- Former Royal National Throat, Nose and Ear Hospital – provision on-site for pocket park / amenity space.
- Land to the rear of the British Library – include a range of public open and green spaces.
- West Kentish Town – is specific in requiring private amenity space for residents.

Draft policies

9.1.38 Key policies that are broadly supportive of amenity objectives include:

- NE1 (The natural environment) – reflects the Council's ambitions for creating space for nature by ensuring that development conserves and enhances the natural environment in response to climate change.
- SC3 (Open space) – is clearly a key policy. It seeks to protect and enhance access to Camden's high-quality open spaces, to promote health and well-being, enhance biodiversity and make space for nature. The policy presents a range of criteria, for example in respect of redevelopment for sports provision *"where the needs outweigh the loss and where this is supported by an up-to-date needs assessment."*

9.1.39 There are no clear strategic choices that might be explored via formal consideration of reasonable alternatives. However, enhancement of open space / access to open space is clearly a highly spatial consideration, such that this could potentially be a matter to explore further via alternatives at the next stage of plan-making, e.g. as part of work to consider masterplan alternatives for key sites. It is not clear that this would be a proportionate level of detail for the Local Plan, but this can be considered further.

9.1.40 Finally, there is a need to consider policies within the Draft Local Plan that lead to a tension with open space-related objectives and that could potentially even generate a significant negative effect in isolation or in combination. Attention potentially focuses on the transport focused policies, as there can be a tension between support for permeability through open spaces and support for other uses, but this is not thought to be a significant concern locally (given the potential to address any tensions through careful design etc).

Conclusion

9.1.41 In conclusion, there are a number of development sites, including certain key non-permitted sites, where there is a considerable opportunity to deliver new and enhanced open space. However, benefits will be fairly localised, and there will remain challenges in respect of open space provision / access to open space across the Borough. As such, a **'limited or uncertain' positive effect** is predicted.

Biodiversity

"Protect and enhance existing habitats and biodiversity and to seek to increase these where possible"

Spatial strategy

9.1.42 The appraisal in Section 6 is supportive of the proposed strategy, recognising redevelopment will often provide a good opportunity to deliver urban greening and a biodiversity net gain. However, there can nonetheless be a residual concern with intensification of sites associated with existing onsite or adjacent sensitive habitats. As discussed in Section 6, this includes certain of the existing industrial sites proposed for intensification that are non-permitted and hence a key strategic consideration for the Local Plan. However, concerns are allayed by site specific policy, which systematically considers all onsite or adjacent areas of local biodiversity value (i.e. designated SINCS) and sets out actions for protection / enhancement.

Draft policies

9.1.43 Key policies that are broadly supportive of biodiversity objectives include:

- NE1 (The natural environment) – reflects the Council’s ambitions for creating space for nature by ensuring that development conserves and enhances the natural environment in response to climate change.
- NE2 – Biodiversity – is clearly a key policy. It seeks to ensure that development protects and enhances nature conservation and biodiversity. Key requirements include:

- Require all major schemes, and those that have the potential to impact biodiversity and designated sites, to prepare a baseline ecological assessment to inform subsequent work on mitigation and enhancement.

As part of this there is requirement that: *“Where mitigation measures are proposed these should be delivered on-site [where possible].”* However, there can also be merit to targeted offsite enhancement.

- Expect development to take account of the local ecological context, strategic and local opportunities for biodiversity gains, including as identified in the emerging work on a Nature Recovery Network.

- Address indirect impacts from factors such as shading, light pollution and risk of disturbance.

- Resist development where it is likely to worsen deficiencies in access to natural greenspace.

A key point to note is that the requirement is for *“biodiversity enhancements commensurate with the scale of proposed residential and non-residential extensions and alterations, including the provision of biodiverse green roofs and species features such as bird and bat boxes”* (also referred to in Policies D3 and D4). This means that all development will be required to deliver some biodiversity enhancements.

- NE3 (Tree protection and planting) – sets out the Council’s approach to tree planting and protection, supporting the Council’s Tree Planting Strategy which sets out ambitions to increase tree canopy cover in the Borough through the planting of at least 600 trees per year over the period to 2025.

9.1.44 Again, it is difficult to pinpoint policy alternatives that might reasonably and meaningfully be explored, with a view to maximising the plan’s performance in terms of biodiversity objectives. However, this could warrant further consideration at the next stage, recognising that planning for biodiversity in the context of Camden (and other inner London Boroughs) is quite a specialised undertaking. On this point, it is noted that the Government has committed to implementing National Development Management Policies, but it is anticipated that there will always be a need for locally tailored development management policies for Camden in terms of wide-ranging issues, not least planning for biodiversity.

9.1.45 Finally, there is a need to consider policies within the Draft Local Plan that lead to a tension with biodiversity objectives and that could potentially even generate a significant negative effect in isolation or in combination. Attention naturally focuses on policies supportive of optimising the use of land with a focus on meeting development needs; however, as has been discussed, it is not possible to conclude with any certainty that doing so creates a significant tension with biodiversity objectives in the Camden context, given the potential for development to deliver urban greening and significant biodiversity net gains (as measured using the Government’s metric). There can also be a tension between biodiversity and open space objectives, but this is quite a detailed, site-specific factor suited to being addressed at the decision-making stage. There are not known to be any significant issues / potential tensions to be addressed through the Local Plan.

Conclusion

9.1.46 In conclusion, having taken account of site-specific and area-wide DM policy is it fair to predict a **‘limited or uncertain’ positive effect** on the baseline (which is one where development continues to come forward, but in a less well-planned way). Biodiversity opportunities might be explored further prior to plan finalisation, recognising the importance of taking a strategic approach in line with the Local Nature Recovery agenda.

Air quality

“Improve local air quality and limit exposure”

Spatial strategy

9.1.47 The appraisal in Section 6 is supportive of the proposed strategy, with the key consideration judged to be around ensuring the optimal use of land in Camden for development, recognising that key growth locations perform very well in terms of accessibility and the potential to reach key destinations by walking, cycling and public transport. The potential to support car free development serves as an important argument in favour of growth locally from a transport perspective and, in turn, from an air quality perspective.

9.1.48 Looking across the suite of proposed allocations, the draft policies for all sites south of the Euston Road and a total of nine other sites make note of identified areas known to experience poor air quality.

9.1.49 Another consideration is redevelopment of existing car parking, which is the proposal for two large permitted sites: Morrisons supermarket and the O2 centre, car park, and car showrooms. Reduction of car parking and provision for other modes of transport over private car use should help to reduce air pollution.

Draft policies

9.1.50 Key policies that are broadly supportive of air quality objectives include:

- A3 (Air quality) – is clearly the key policy. It aims to support the objectives of the Council's Clean Air Strategy and seeks to ensure that new development contributes to improving air quality in Camden. It requires all development to be at least air quality neutral in accordance with the London Plan and associated guidance; states that the Council will resist applications for sensitive uses (such as childcare, schools or accommodation for elderly people) in areas of particularly poor air quality; in addition to resisting developments that introduce sensitive uses (e.g., housing) in locations of poor air quality, unless they are designed to substantially mitigate the impact; and states that the Council will apply the GLA emission standards for Non-Road-Mobile-Machinery for the Central Activities Zone across the whole Borough.
- T1 (Safe, healthy and sustainable transport) – seeks to prioritise the delivery of safe, active, healthy, affordable, and sustainable transport in line with the Council's Transport Strategy, Climate Action Plan, and Clean Air Action Plan. The goal is to maximise health and well-being, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities.
- T2 (Prioritising walking, wheeling, and cycling) – seeks to promote active travel by prioritising walking, wheeling, and cycling in the borough, in support of wide-ranging objectives and including air quality.
- T3 (Public Transport) – focuses on the bus network, requiring improvements to infrastructure including bus stops, shelters, passenger seating, waiting areas, signage, and timetable information. Also, where appropriate, development is required to provide for interchange between different modes of transport, including facilities to make interchange easy and convenient for all users.
- T4 (Shared transport infrastructure and services – reflects the Council's commitment to providing a network of shared transport infrastructure and services across Camden. This includes the expansion and improvement of the Santander cycle hire docking station network, the e-bike and e-scooter hire bay network, the electric vehicle charging point network, and the car club bay network.
- T5 (Parking and car-free development) – states that the Council will limit the availability of parking and require all new developments to be car-free, aimed at reducing car ownership and vehicle use. Car-free development means that no car parking spaces are provided within the site other than those reserved for disabled people, car clubs, and businesses and services reliant upon parking, where this is integral to their nature, operational and/or servicing requirements (e.g., emergency services, storage and distribution uses). From an air quality perspective it is also important to recognise prevalent use of taxis and private vehicle hire services. Also, there is a need to consider whether use of car clubs could increase over time.
- T6 (Sustainable movement of goods, services, and materials) – seeks to promote the sustainable movement of goods, services and materials and minimise their movement by road. The policy supports: *"... freight consolidation facilities to ensure that last mile deliveries are undertaken by sustainable means."*
- CC1 (Responding to the climate emergency) – sets out key priorities of relevance to air quality, including as gas boilers create are a source of air pollution in dense urban areas. With regards to retrofitting and designing buildings for energy efficiency, there is a need to give careful consideration to ensuring ventilation and, in turn, good indoor air quality; however, there are established good practice principles.

9.1.51 Finally, with regards to the question of policies within the Draft Local Plan that lead to a tension with air quality objectives, it is not possible to pinpoint any policies of note.

Conclusion

9.1.52 In conclusion, there are arguments in favour of supporting growth locally from an air quality perspective, and it is important to recognise that growth would continue to come forward in the absence of a new Local Plan. However, poor air quality is a considerable issue locally, such that the plan requires ongoing scrutiny. There is good potential to address this issue through DM policy and through careful decision-making in respect of site capacity and use mix, the location of sensitive uses and the design of development. Ongoing work can be guided by the Council's Clean Air Action Plan. A **neutral effect** is predicted.

Energy and resources

“Promote efficient use of energy, water and other natural resources, throughout the life of the development”

Spatial strategy

9.1.53 The appraisal in Section 6 is strongly supportive of the proposed strategy, particularly because there is support for mixed use intensification of industrial sites from a built environment decarbonisation perspective. This is a key strategic policy area for the Local Plan, because key sites are non-permitted.

9.1.54 The point made above is focused on ‘operational’ built environment emissions; however, it is recognised that there is also a major national focus, and within London in particular, on minimising embodied (or ‘non-operational’) emissions, particularly through support for reuse of buildings ahead of demolition and rebuild. This is a factor that has fed into identified site capacities, but there will be a need for further work ahead of plan finalisation, recognising implications for the number of homes and amount of employment floorspace that can be supported, as well as a potential need to compromise in respect of other objectives.

9.1.55 Retrofitting existing properties is another key decarbonisation priority, albeit opportunities to be realised through the Local Plan are somewhat limited (because retrofitting often does not require planning permission). Finally, it is important to be clear that the focus of discussion here is in respect of built environment decarbonisation, but there is also a need to consider transport-related greenhouse gas emissions. In this respect, there is clear support for growth in Camden, given the potential to direct growth to locations with excellent accessibility and transport connectivity credentials.

Draft policies

9.1.56 Key policies that are broadly supportive of energy and resources-related objectives include:

- CC1 (Responding to the climate emergency) – states that the Council will prioritise the provision of measures to mitigate and adapt to climate change and require all development in Camden to respond to the climate emergency. Key areas of focus are: retrofitting existing buildings, reduction of waste and application of circular economy principles, energy reduction for new and existing buildings, building climate resilience to changes already occurring in our environment, and conserve existing resources.
- CC2 (Repurposing, refurbishment and re-use of existing building) – seeks to ensure that the repurposing, refurbishment and re-use of existing building/s is prioritised over demolition.
- CC3 (Circular economy and reduction of waste) – seeks to ensure that developments minimise waste, use resources efficiently, and are designed to facilitate easy maintenance and adaptability of use.
- CC4 (Minimising carbon emissions) – seeks to ensure that all development minimises carbon emissions over the lifespan of the building(s), i.e. looking beyond operational emissions (see Policy CC6). As part of this, the proposal is: *“Require new build developments to meet embodied carbon limits of less than 500kg CO₂/m² for residential, and less than 600kg CO₂/m² for non-residential.”*
- CC5 (Energy reduction in existing buildings) – states that the Council will support adaptations and improvements to existing buildings to make them more energy efficient and reduce the energy needed to occupy the building and sets out a number of criteria to achieve this.
- CC6 (Energy reduction in new buildings) – seeks to ensure that all new buildings are designed and built to be net zero carbon in operation. The proposal is to apply an Energy Use Intensity (EUI) method, which is strongly supported from a decarbonisation perspective, albeit there is a need to avoid unduly burdening planning applications, who must also apply with the Building Regulations method. See Box 9.2.
- CC7 (Heat networks) – seeks to ensure that all major developments utilise energy from heat networks where feasible. The plan might helpfully provide some further background information on the different types of heat network, including highlighting latest views on the role of combined heat and power (CHP).
- CC10 (Sustainable design and construction certification) – seeks to ensure that development achieves the highest possible standards of sustainable design and construction – through BREEAM certification (development size thresholds apply). The policy applies specifically to residential refurbishments and non-residential developments, and it is recommended that efforts are made to clarify this, as the relationship between requirements to achieve certification and requirements around EUI performance can create confusion. In general, it is recommended that the ‘CC’ policies should be reviewed for conciseness, recognising the importance of the Local Plan in terms of educating an interested public on this topic.

Box 9.3: Further discussion of Policy CC6 (Energy reduction in new buildings)

This is a key policy area for the new Local Plan, with clear options in respect of how to adjust the adopted Local Plan policy to reflect national and London-specific understanding of best practice. It is important to note that since adopting the current Local Plan in 2017 the Council has declared a Climate and Ecological Emergency, and committed to do everything it can to make Camden net zero carbon by 2030.

Minimising operational emissions from new development is just one of many key policy levers that must be pulled if the 2030 net zero target is to be achieved. However, it is a key matter for the Local Plan.

Part L 2021 of the Building Regulations covers the conservation of fuel and power in dwellings (volume 1) and buildings other than dwellings (volume 2). All buildings must comply with Part L 2021 of the Building Regulations and they set a minimum level of performance. However, in order to deliver their climate commitments, local authorities can decide to go further than the Building Regulations and set their own energy and carbon targets.

To inform the approach to the delivery of net zero carbon developments in the Plan, the Council, along with 17 other London boroughs, commissioned a joint study entitled 'Delivering Net Zero, an evidence study to support planning policies which deliver Net Zero Carbon developments'. The study explored two main policy options:

- Option 1 – consists of continuing to use the same system based on the Part L framework and adapting it to Part L 2021. This system requires the applicant to use a Part L energy modelling software, and performance is measured against a single metric (i.e. % reduction in regulated carbon emissions over Part L 2021). This metric cannot be measured post-occupancy. This option generally only considers regulated energy use and allows carbon offsetting to play a significant role.
- Option 2 – is a new system focusing on absolute energy-based metrics. It requires the applicant to use predictive energy modelling tools and methodologies. Performance is measured against a number of metrics (e.g. space heating demand, Energy Use Intensity). A significant advantage of the Energy Use Intensity (EUI) is that it can be measured post-occupancy as it generally aligns with 'energy at the meter'. This option considers all energy used in the building (except EV charging points) and simply defines net zero as a balance between energy use and on-site renewable energy generation (with offsetting as a last resort).

Conclusion

9.1.57 In conclusion, whilst the Local Plan will see an improvement on the baseline, there is a need to reach conclusions taking account of established objectives and targets, in particular the Borough's 2030 net zero target. In this light, there is a high bar to reach before predicting positive effects of any significance, and so a **'moderate or uncertain positive effect'** is predicted. There is a need for further work to explore spatial strategy, site and scheme-specific decarbonisation opportunities and, in this respect, it is noted that a future Local Energy Area Plan for the Borough may identify locations for specific energy infrastructure.

Water

"Protect and manage water resources (including groundwater)"

Spatial strategy

9.1.58 The appraisal in Section 6 is not able to draw strong conclusions regarding the merits of otherwise of the proposed strategy. A key consideration is Camden's two Groundwater Source Protection Zones, located within the southwest of Primrose Hill Park and a section of South Hampstead from Prince Albert Road to Swiss Cottage. Also, areas around Hampstead Heath, Hampstead, Bloomsbury and Holborn are designated as a Secondary A Aquifer (which means capable of supporting local water supply). There are a number of development activities that can impact on groundwater, including basement developments, but it is difficult to conclude that the spatial strategy, including site capacity decision-making, leads to any concern.

Draft policies

9.1.59 The key policy that is supportive of water-related objectives is Policy NE4 (Water quality). The policy seeks to ensure that development avoids the pollution of groundwater sources to protect the water environment and public health. The policy recognising that Camden has two Groundwater Source Protection Zones and that other areas are designated as Secondary A aquifers.

9.1.60 With regards to policies that potentially give rise to a tension with water objectives, there is a need to consider Policy D6 (Basements). However, the key point to note is that: *“The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to... the structural, ground, or water conditions of the area.”*

Conclusion

9.1.61 In conclusion, there is an argument for predicting a positive effect, recognising that development would continue to come forward in the absence of a new plan; however, a **neutral effect** is predicted on balance. It is difficult to conclude the plan will have a positive effect of any particular significance (in the context of significant benefits that will be realised in terms of other objectives discussed above and below).

Resilience

“Ensure our buildings and environment can adapt to a changing climate”

Spatial strategy

9.1.62 The appraisal in Section 6 is not able to draw strong conclusions regarding the merits of otherwise of the proposed strategy. The discussion in Section 6 focuses on flood risk recognising that, whilst fluvial flood risk is not an issue locally, there is a need to consider flooding from other sources, including surface water flood risk; however, there are no clear concerns associated with the spatial strategy.

9.1.63 Looking across the suite of proposed allocations: site-specific policy for sites of 1 hectare or more, and all sites that may be at risk of flooding, require submission of a Flood Risk Assessment. For sites identified as being at risk from flooding, the Council will expect that the development has been designed to be resilient to flooding and set out how the risk of flooding will be mitigated over the lifetime of the development, without increasing flood risk elsewhere. The following sites (many of which are permitted) are identified as being at risk of flooding from one or more sources (surface water, groundwater, sewer surcharge):

- North
 - Mansfield Bowling Club
 - Hampstead Delivery Office
- Central
 - Morrisons Supermarket
 - Morrison’s Petrol Station
 - 100 Chalk Farm Road
 - Regis Road and Holmes Road Depot, and Murphy Site
 - 369 – 377 Kentish Town Road, and Kentish Town Fire Station
 - West Kentish Town Estate, and Wendling and St Stephen’s Close
 - Camden Town over station development, 109 Camden Road
- South
 - 120 – 136 Camley Street, 104-114 Camley Street, Parcelforce ATS Tyre, Shorebase Access, and St Pancras Hospital
 - Eagle and Bangor Wharf
 - Former Royal National Throat, Nose and Ear Hospital, and Former Thameslink Station
 - Land to the Rear of the British Library
 - The Network Building and Whitfield Street, Former Tottenham Mews Day Hospital, 1 Museum Street, and Former Central St Martins
 - 135-149 Shaftesbury Avenue, and Land bounded by Pakenham and Wren Street
- West
 - O2 Centre, car park and showrooms, and 14 Blackburn Road

– Meridian House

Draft policies

9.1.64 Key policies that are broadly supportive of resilience-related objectives include:

- CC1 (Responding to the climate emergency) – has already been discussed above, from a climate change mitigation / decarbonisation perspective, but also includes a climate change adaptation / resilience focus.
- CC8 (Overheating and cooling) – this is a key policy, as overheating is a key climate change risk to the Borough, alongside flood risk. The proposal is to resist applications that include active cooling (air conditioning) and non-essential mechanical plant and to all development to:

“... minimise the adverse impacts of overheating through the application of the London Plan cooling hierarchy. Applicants should include information demonstrating that the risk of overheating has been mitigated through the incorporation of design measures in the Sustainability Statement.”
- CC9 (Water efficiency) – reflects another key climate change adaptation / resilience consideration, given the likely increased prevalence of drought conditions and low water levels. The policy seeks to maximise water efficiency in Camden, recognising that London has been declared an area of serious water stress.
- CC11 (Flood risk) – as per the discussion presented above under biodiversity, whilst flood risk focused DM policy nationally can be quite standardised (which, in turn, lends support to arguments for National DM Policies), in the context of Camden and other Inner London Boroughs there are a range of important locally specific policy considerations. A key consideration is that flooding from surface water and sewer sources pose the greatest risk to flooding, and the risk is interconnected (due to combined sewers).
- CC12 (Sustainable drainage) – seeks to control surface water run-off from development to reduce the risk of flooding. The policy states that the Council will require developments to utilise Sustainable Drainage Systems (SuDS), to achieve greenfield run-off rates, unless it is demonstrated to the Council's satisfaction that this is not feasible. Surface water should be managed as close to its source as possible.

9.1.65 With regards to policies that potentially give rise to a tension with 'resilience' objectives, attention potentially focuses on decarbonisation and other 'sustainable design' focused policies, given the need to carefully plan for good ventilation and cooling alongside energy efficiency (as part of which there is a need to factor-in air tightness). However, there are no significant concerns in light of emerging best practice measures.

Conclusion

9.1.66 In conclusion, there is an argument for predicting a positive effect, recognising that development would continue to come forward in the absence of a new plan; however, a **neutral effect** is predicted on balance. There will be a need to take account of comments received from the Environment Agency.

Design

“Promote high quality and sustainable urban design”

Spatial strategy

9.1.67 The appraisal in Section 6 is strongly supportive of the proposed strategy, particularly because certain of the key non-permitted sites that are a focus of the Local Plan are large sites that are well-suited to a masterplanned and design-led approach to redevelopment focused on place-making. Also, looking across the full suite of site allocations, site policies are tailored to respond to specific elements of townscape value and other existing issues such as limited permeability or non-active frontage.

9.1.68 Another key issue is building heights and tall buildings, with it well established – through the Local Plan 2017 - that the whole of the Borough is sensitive to the development of tall buildings. In response to London Plan Policy D9 (Tall buildings) the Council has undertaken a Building Height Study, and the findings of the study are reflected in site policies, with height ranges set out that could potentially be appropriate, subject to compliance with wider policy considerations. Sites that have been identified as being potentially suitable for tall buildings are:

- 120 – 136 Camley Street
- 104 – 114 Camley Street
- Parcelforce and ATS Tyre site

- St Pancras Hospital
- Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street
- Regis Road and Holmes Road Depot
- Murphy Site
- Morrisons Supermarket
- Juniper Crescent
- Network Rail land at Juniper Crescent
- West Kentish Town Estate
- Wendling Estate and St Stephens Close
- O2 Centre, car park, showrooms, and 14 Blackburn Road

9.1.69 The Camden Building Height Study identifies that tall building impacts can be positive or negative and a pro-active approach to planning for tall building development aims to optimise their impacts, so that positive impacts are maximised whilst negative impacts are mitigated against or avoided. In deciding the appropriateness of a tall building, its beneficial and adverse impacts both individually and cumulatively will need to be carefully considered and balanced. This must include giving consideration to the characteristics and sensitivities of the place, together with wider development and planning objectives and policies, as well as development interest and deliverability.

Draft policies

9.1.70 Key policies that are broadly supportive of design objectives include:

- D1 (Achieving design excellence) – states that all development in Camden must achieve excellence in the architecture and design of buildings and places to respond to the climate change emergency, improve the health and well-being of our communities and celebrate Camden’s diversity of people and place.
- D2 (Tall buildings) – see discussion above.
- D3 (Design of housing) – requires all housing development, including proposals for the alteration, extension, and conversion/ change of use of existing buildings to be designed and built to create high quality, accessible homes. Housing should also be designed to be flexible and adaptable, taking account of changes in the age profile of Camden residents, in addition to the needs of future generations.
- D4 (Extensions and alterations) – supports residents to extend and alter their homes, subject to satisfying the criteria set out in the policy. Extensions and alterations offer the opportunity for residents to improve and expand their homes to respond to changes in circumstance, improve living conditions, make their homes more energy efficient and generally meet their needs both now and in the future.
- D6 (Basements) – seeks to control basements to protect the amenity of neighbouring occupiers.
- D7 (Advertisements and signage) – seeks to control advertisements focused on amenity and public safety.
- D8 (Shopfronts) – focuses on the retention of existing and provision of new shopfronts in Camden.

9.1.71 With regards to policies that potentially give rise to a tension with design objectives, attention potentially focuses on decarbonisation focused policies, for example solar panels and air source heat pumps can be an issue in conservation areas. See discussion below, under ‘Historic environment’.

Conclusion

9.1.72 In conclusion, it is fair to predict a **‘limited or uncertain’ positive effect** after having accounted for site specific and area-wide policies. The approach taken to reflecting the findings of the Building Heights Study warrants being a focus of ongoing scrutiny prior to plan finalisation, balancing the need for early certainty regarding the capacity of sites with a need to give careful consideration to wide ranging design considerations at the planning application stage.

Historic environment

“Protect and enhance the historic environment”

Spatial strategy

9.1.73 The appraisal in Section 6 is supportive of the proposed strategy, albeit recognising that a number of the sites proposed for development / re-development are located within a conservation area or otherwise associated with historic environment sensitivities.

9.1.74 The key point to note is that site capacities have been defined taking careful account of historic environment constraints. Also, all site policies recognise historic assets with a view to ensuring they are protected and / or enhanced. This includes not only onsite assets, but also relevant nearby assets after having given consideration to their setting. Tall buildings are a further key consideration, as discussed above.

Draft policies

9.1.75 The key policy that is supportive of historic environment objectives is Policy D5 (Heritage). A number of aspects of the policy are generic – i.e. would apply equally to any Local Plan nationally – however, there are a number of important locally specific policy considerations. Notable requirements include:

- Protect non- designated heritage assets (including those on and off the local list) and London Squares.
- Resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area.
- Preserve trees and garden spaces which contribute to the character and appearance of a conservation area, or which provide a setting for Camden’s architectural heritage.

9.1.76 With regards to the key issue of sensitively adapting historic buildings to respond to the climate emergency, the Draft Local Plan explains:

“Historic buildings, including those in conservation areas, can be sensitively adapted to reduce energy demand and respond to the climate emergency, while preserving their special interest and ensuring their long-term survival... Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and heating and lighting systems and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics.

... In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained... These considerations will be weighed against the degree to which proposals will change the appearance of the building... Applicants are encouraged to follow the detailed advice in Camden’s Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas and the Historic England website.”

9.1.77 It is not clear that there are any reasonable alternatives in respect of Policy D5, but suggestions are welcomed through the current consultation.

9.1.78 With regards to policies that potentially give rise to a tension with historic environment objectives, attention potentially focuses on tall building and decarbonisation focused policies. In respect of tall buildings, the key point to note (as discussed above) is that tall building proposals will be considered on their merits at the planning application stage, with performance judged against wide-ranging policy criteria. In respect of decarbonisation and resilience focused adaptations to taller buildings, the key point to note is that guidance is in place to ensure that impacts are avoided or mitigated as far as possible.

Conclusion

9.1.79 In conclusion, there is a need for further scrutiny of assumed capacity and site specific policy for a number of key non-permitted allocations, with a view to balancing objectives around maximising housing supply and avoiding tensions with the historic environment. As such, a **neutral effect** is predicted at the current time. It will be important to take account of the views of Historic England received through the current consultation.

Land

“Ensure new development makes efficient use of land, buildings and infrastructure”

Spatial strategy

9.1.80 The appraisal in Section 6 is supportive of the proposed strategy, albeit it is unavoidably the case that there is preference for a higher growth strategy. As has been discussed under the headings above, ensuring the optimum use of land (with self-contained homes as the priority land use) is a key priority for the Local Plan.

Draft policies

9.1.81 Key policies that are broadly supportive of objectives relating to efficient use of land include:

- DS1 (Delivering healthy and sustainable development) – requires developers to: ensure that land is used efficiently, and that a development makes best use of its site; provide a mix of uses, services, facilities and amenities that meet the needs of the local community; provide the necessary infrastructure in a timely way; and ensure that sites are designed and developed comprehensively. The policy is clear that the Council will resist development that makes inefficient use of Camden’s limited land.
- T5 (Parking and car free development) – states that Council will limit the availability of parking and require all new developments to be car-free. It supports the redevelopment of existing car parks for alternative uses, and requires applicants to reduce on-site parking, as far as possible.

9.1.82 With regards to policies that potentially give rise to a tension with objectives relating to efficient use of land, it is inherently difficult to meaningfully comment, given that the definition of ‘efficient use’ is somewhat subjective. Clearly, in the Camden context, efficient use of land involves striking a balance between competing land uses and policy priorities.

Conclusion

9.1.83 In conclusion, a **‘limited or uncertain’ positive effect** is predicted, as per the conclusion in Section 6.

Economy and employment

“Encourage and accommodate sustainable economic growth and employment opportunities”

Spatial Strategy

9.1.84 The appraisal in Section 6 is strongly supportive of the proposed strategy, as it is reflective of a clear strategy for providing for employment land needs, as understood from the Employment Needs Assessment (2023). However, there remain potential tensions with economy / employment objectives that warrant ongoing scrutiny (particularly around continued operation of current industrial uses post intensification).

9.1.85 Looking across the full suite of proposed allocations, for most sites with an existing employment function the proposal is to include housing where feasible responding to the plan priority land use, while seeking to intensify existing employment use and provide a better range of workspaces.

9.1.86 With regards to site specific policies:

- Central sub area
 - The main site allocations proposed in Kentish Town (Regis Road and Holmes Road Depot, and the Murphy Site) are largely industrial and low density in character. Importantly, these sites do not have planning permission. The opportunity for redevelopment and intensification of employment in this area was identified in the 2017 Camden Local Plan, stating that redevelopment proposals could form part of development providing they would not prejudice the successful operation of business in the area. Since the adoption of the Local Plan, the London Plan 2021 has been adopted, and includes policy E7 ‘Industrial intensification, co-location and substitution’. This policy originally included the following requirement but was later directed to delete it by the SoS “the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing”. Draft Local Plan Policy IE3 (Industry) seeks to manage and protect the supply of industrial and warehousing land, while recognising the opportunity for some sites to be used more efficiently to deliver wider Local Plan objectives.

- Other draft site policies in the Central sub capable of delivering a new and mixed use neighbourhood are located on and around the Morrisons Supermarket site, these include existing employment uses. The aim of these site policies are to deliver a significant number of homes and provide retail and employment premises. Sustainable economic growth reflecting local need is expected by development including provision of suitable social infrastructure.

- South sub area

- The South sub area forms a significant part of London's Central Activities Zone (CAZ). The CAZ is a major business and employment centre, which contains a significant proportion of the borough's office floorspace. It is home to clusters of financial and professional services, technology and creative industries, in addition to specialist clusters of medical excellence, life sciences research and law. The CAZ also has a diverse and vibrant retail and leisure offer focussed around a number of CAZ retail clusters and other specialist shopping areas.

- The most significant location in the south sub area with potential for delivering homes, jobs, and infrastructure are on the industrial sites at Camley Street, with several key sites not permitted. The draft site policies reflect the Planning Framework vision to optimise the potential of land, including a mix of workspaces that builds on its industrial past, suitable for different types and sizes of business, and a range of homes to meet Camden's needs. These sites will seek to make the most effective use of land available and deliver significant positive effects for economy and employment SA objectives.

- West sub area

- The most significant sites in delivering jobs, homes, and infrastructure in the west area of Camden are those in and adjacent to the O2 Centre. The site is currently occupied by leisure, retail, and car parking functions. The draft site allocation seeks to make the most efficient use of land and buildings through the delivery of a significant amount of homes and employment, health, and town centre uses. Finchley Road and Swiss Cottage is the third largest Town Centre in the borough, the site allocation should help to sustain the vitality of the Town Centre.

9.1.87 Overall the approach for existing areas of employment is to make the most efficient use of land and buildings, by intensifying the density of employment space and providing a policy position for development which seeks to increase the supply of homes and facilities for the community. This is also reflected in the draft Local Plan Policy IE3 Industry which seeks to manage and protect the supply of industrial and warehousing land, while recognising the opportunity for some sites to be used more efficiently to deliver wider Local Plan objectives. This approach should support sustained economic growth and public benefit over a baseline which does not provide a comprehensive approach to development.

Draft policies

9.1.88 Key policies that are broadly supportive of economy / employment objectives include:

- IE1 (Growing a successful and inclusive economy) – is an overarching policy focused on securing a strong, diverse, sustainable and inclusive economy in Camden, and maximising opportunities for residents, businesses and voluntary sector to contribute to and share in the success of Camden's economy.
- IE2 (Offices) - seeks to retain office floorspace where it can continue to meet an economic need whilst providing flexibility for conversion to permanent self-contained housing (the Local Plan's priority use) where there is clear evidence this is no longer possible. The policy also recognises that the conversion of large office buildings may in some cases provide an opportunity to improve local access to smaller, flexible accommodation for start-ups and SMEs, particularly affordable workspace.
- IE3 (Industry) – sets out the Council's approach to managing Camden's industrial land supply. The policy states that the Council will manage and protect the supply of industrial and warehousing land, while recognising the opportunities for some sites to be used more efficiently to deliver wider objectives.
- IE4 (Affordable and specialist workspace) – is a key policy. It sets out the need for larger employment schemes to contribute towards the delivery of affordable workspace in Camden, to support the delivery of the Council's affordable workspace strategy.
- IE5 (Hotels and visitor accommodation) – steers additional provision to areas of the Central Activities Zone, where there are already concentrations of these uses, and to sites within designated town centre boundaries, recognising that hotels and visitor accommodation can contribute to town centre vitality.

- IE6 (Supporting town centres and high streets) – sets out the Council’s approach to supporting town centres and high streets, to ensure they remain successful and vibrant centres, to serve the needs of residents, workers and visitors. This is supported by Policy IE10 (Markets).
- SC5 (Cultural facilities) – sets out the Council’s strategy for supporting cultural facilities in Camden, recognising that cultural facilities, such as museums, theatres, galleries, cinemas, live music, comedy, and dance contribute enormously to Camden’s attractiveness as a place to live, visit, work and study.
- S2 (Hatton Garden Specialist Employment Area) – seeks to secure and retain premises suitable for use as jewellery workshops and related uses in the Hatton Garden area. It resists the development of business premises and sites for a non-business use.
- S3 (Bloomsbury Campus area) – sets out a number of objectives for the Bloomsbury Campus Area, recognising the importance of the University of London and the higher education sector to the Camden economy. The policy seeks to ensure that the Campus Area maintains its higher education role and sets out a number of priorities for development in the Campus Area.

9.1.89 With regards to the question of reasonable alternatives, attention focuses on Policy IE4 (Affordable and specialist workspace). The Local Plan proposes to set a target for 20% of the gross floorspace to be provided at 50% of market rents for a minimum period of 15 years. However the viability work for the Local Plan has also explored an alternative, namely requiring a different proportion of affordable workspace (specifically 10% of floorspace; N.B. with depth of discount and duration of the obligation held constant). Clearly there is merit to the preferred option from an ‘economy and employment’ perspective; however, it is unavoidably the case that there could be knock on implications for viability and, in turn, other objectives.

Conclusion

9.1.90 In conclusion, after having taken account of the spatial strategy alongside site-specific and area-wide DM policy, it is fair to predict a **significant positive effect**. The Local Plan should serve to support Camden’s role as one of the most important business locations in the country.

Centres

“Ensure designated centres remain sustainable and adaptable for the future”

Spatial strategy

9.1.91 The discussion in Section 6 is broadly supportive of the proposed strategy. The new Local Plan has a clear ‘place-based’ focus, as part of which there is a focus on the potential for growth to support centres. However, there is overall quite limited growth directed to town centres.

Draft policies

9.1.92 Key policies that are broadly supportive of economy / employment objectives include:

- IE6 (Supporting town centres and high streets) - sets out the Council’s approach to supporting town centres and high streets in Camden, to ensure they remain successful and vibrant centres, to serve the needs of residents, workers and visitors.
- SC6 (Public Houses) – sets out that the Council will seek to 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 specified policy criteria have been met.

Conclusion

9.1.93 After having accounted for the spatial strategy alongside the proposed suite of development management policies, and after having given consideration to the baseline situation (which is one whereby development comes forward in a less well-planned way), it is fair to predict a **‘limited or uncertain’ positive effect**.

Conclusion on the Draft Local Plan

9.1.94 The appraisal of the Draft Local Plan as a whole has concluded broadly positive effects with no negative effects predicted, although there are a range of specific tensions between the emerging plan and sustainability objectives, and instances where the plan might 'go further' in order to realise opportunities. These tensions and potential opportunities can be explored further at the next stage.

9.1.95 Specifically, the appraisal has concluded:

- **Significant positive effects** under three headings (Health; Efficient land use; Economy/employment);
- **Limited or uncertain positive effects** under seven headings; and
- **Neutral effects** under the remaining six headings.

9.1.96 Where it is not possible to predict significant positive effects, this reflects considerations including:

- In some respects the effects of the plan are fairly limited, as many proposed development sites have planning permission and for some DM policy areas there is limited choice open to the Council.
- Under some headings the plan is associated with pros and cons, such that it is difficult to conclude anything other than overall 'neutral' effects. This is most notably the case under the 'Homes' heading.
- In some cases the plan will clearly result in an improvement on the baseline situation, but there is a need to reach a conclusion on significant effects taking into account established objectives / targets. This is most notably the case under the Energy and resources heading, where there is a need to account for the Borough's 2030 net zero commitment. Also, under the Homes heading, whilst there is no strict target in respect of supply that must be provided for post 2029, it is clear that housing need is very high.

9.1.97 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 in the plan.

9.1.98 Final points to note are:

- Cumulative effects – there is a requirement consider 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects. For Camden, this primarily translates as a need to consider the implications of the Local Plan for other London Boroughs, for sectors of London (notably the CAZ) and for London as a whole. In this respect, there will be a need to take careful account of consultation responses received from neighbouring boroughs and the Greater London Authority (GLA). It may also be possible to finalise the plan with some initial understanding regarding the scope of the London Plan Review.

- Reasonable alternatives – the appraisal above makes reference to a number of development management policy areas potentially associated with a strategic choice between alternatives, and comments on reasonable DM policy alternatives would be welcomed through the current consultation.

To recap, the key matter that has been a focus of work to explore reasonable alternatives to date is around balancing objectives relating to boosting housing supply with wide ranging other objectives that collectively serve to constrain the potential to deliver new homes in the Borough (see Part 1 of this report).

- Appraisal of sites in isolation – as discussed in Section 5.3, all site allocations (accounting for draft policies) have been appraised in isolation, and this work fed into the Draft Plan appraisal presented above. The appraisal of site options in isolation is presented in Appendix II. The appraisal in Appendix II takes account of site policies and, in this respect, it is important to note that site policies have evolved since the publication of the Draft Site Allocations Local Plan, including in light of appraisal work from that time. Policies are now found to perform more positively in terms of supporting objectives relating to health, biodiversity, design and heritage, and social exclusion. The current appraisal also notably reflects enhanced requirements to mitigate the additional impacts brought about when several sites commence work in close proximity to one another.

Part 3: What are the next steps?

10 Plan finalisation

Publication of the Proposed Submission Local Plan

- 10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the local plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.1.2 The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 10.1.3 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.5 Once found to be 'sound' the Local Plan will be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 Within the SA Report (N.B. this is not the SA Report, but rather an "Interim" SA Report), the requirement is to present "measures envisaged concerning monitoring". It is difficult to recommend steps that might be taken in respect of ongoing monitoring, given resource implications, and the question of an appropriate monitoring framework will be revisited prior to plan finalisation. However, at the current time it is suggested that certain of the key issues that are explored through the appraisal of reasonable alternative growth scenarios (Part 1 of this report) might warrant being a particular focus of monitoring efforts moving forward.
- 11.1.2 Efforts might focus on monitoring housing delivery as part of redevelopment schemes broken down by location within the Borough and also the nature of the scheme (including previous use). Matters relating to net zero development also warrant close monitoring, with a focus both on minimising operational energy use / greenhouse gas emissions and also minimising embodied emissions through building reuse etc.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

N.B. this is not the SA Report, but nonetheless aims to present the information required of the SA Report.

Table A: Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(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;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(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	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

i.e. answer – *What's the scope of the SA?*

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') 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 Section 3 in an adjusted form.
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 an 'SA framework', which is presented within Section 3. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains 'reasons for supporting the preferred approach', i.e. 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.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents 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/dimensions.
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;	Section 9 presents recommendations.
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;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
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)	This Interim SA Report is published alongside the Draft Plan in order to inform consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
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.	This Interim SA Report will be taken into account when finalising the plan for publication (as discussed in Section 10).

Appendix II: Site options

As discussed in Section 5.3, one step taken involved appraising all site options / proposed allocations under the SA framework. This appendix presents the outcomes of that work which was undertaken by LBC officers. Also, this appendix ends with a list of sites considered but discounted (all for clear cut reasons).

The methodology simply uses + and – alongside red / amber / green shading to highlight issues and ultimately flag the pros / benefits and cons / drawbacks associated with each of the sites. The aim is not to predict ‘significant effects’ (see Sections 6 and 9 of this report for discussion of the significant effects associated with the plan and reasonable alternatives). Finally, it should be noted that account is taken of development management policies.

North Area site allocation policies

Three site allocations are proposed in the north area. These sites are appraised below.

Sustainability Appraisal objective	Mansfield Bowling Club N2 (IDS12)	Queen Mary's House N3 (IDS20k)	Hampstead Delivery Office N4 (IDS20l)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p> <p>c) Provide housing for people, particularly families, on moderate and lower incomes?</p> <p>d) Encourage development at an appropriate density, standard, size and mix?</p> <p>e) Provide everybody with the opportunity to live in a better home?</p>	0	+	+	<p>The Mansfield Bowling Club site is located in a housing neighbourhood within the Dartmouth Park Conservation Area. The site is also identified as a specific neighbourhood site in the Dartmouth Park Neighbourhood Plan. The site has planning consent for 23 homes and the site allocation reflects this with the addition / replacement as residential care.</p> <p>Queen Marys House is a former hospital which has been used in more recent years for key worker housing. The policy seeks to intensify the residential use of the site by increasing the number of self-contained homes, as such it will have a minor positive effect on housing objectives.</p> <p>The Hampstead Delivery Office allocation promotes residential development on a site that currently has no residential use, as such it will have a minor positive effect on housing objectives.</p>
<p>2 Healthy communities</p> <p>To promote a healthy community</p>	+	+	+	<p>Mansfield Bowling club mirrors the consented scheme for the site and seeks to ensure that the wider</p>

Sustainability Appraisal objective	Mansfield Bowling Club N2 (IDS12)	Queen Mary's House N3 (IDS20k)	Hampstead Delivery Office N4 (IDS20l)	Commentary
a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles? b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive? c) Support improvements to existing homes (healthy living environment) d) Support health providers and commissioners to fulfil their strategic estates plans? e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?				<p>community benefits are retained if a new application were to be received on this site.</p> <p>The allocation for Queen Mary's House may support health providers with wider strategic estate plans.</p> <p>The allocation of Hampstead Delivery Office seeks to ensure that development is integrated and would not negatively impact existing pedestrian routes.</p>
3 Social exclusion To tackle poverty and social exclusion and promote equal opportunities a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups? b) Provide for equality of access for all to buildings and services? c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access d) Encourage development opportunities in those areas in need of economic development?	+	0	0	<p>The site allocations within the north area are housing led and do not seek to address issues of social exclusion. They are not located in areas identified as being deficient in access to open space.</p> <p>The site allocation for Mansfield Bowling club seeks to ensure that existing facilities are retained for use of the local community which should have a lasting long term positive impact on health and wellbeing.</p>
4 Amenity	0	0	+	The allocation of Hampstead Delivery Office for housing may help to improve the future residential amenity of the

Sustainability Appraisal objective	Mansfield Bowling Club N2 (IDS12)	Queen Mary's House N3 (IDS20k)	Hampstead Delivery Office N4 (IDS20l)	Commentary
<p>To improve amenity by minimising the impacts associated with development</p> <p>a) Ensure that the amenity of neighbours is not unduly impacted?</p> <p>b) Ensure that development and operations will not affect noise sensitive uses?</p>				<p>local area in the long term through less vehicle trips and associated noise of the delivery office.</p>
<p>5 Open space</p> <p>To conserve and improve open space provision</p> <p>a) Help to protect, increase/improve open space?</p>	+	0	-	<p>Mansfield Bowling club - Part of the site is designated as private open space and tennis courts are also provided on the site. The Dartmouth Park Neighbourhood Plan identifies the site as a 'specific neighbourhood site' and designates part of it as a Local Green Space. New public open space would be required.</p>
<p>6 Biodiversity</p> <p>To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.</p> <p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan?</p> <p>b) Provide for the protection of biodiversity and open space in the borough?</p> <p>c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity?</p> <p>d) Provide for new re-naturalised areas?</p> <p>e) Protect and provide for the protection and planting of more trees in the borough?</p>				<p>Queen Mary's House is located near to Hampstead Heath. This allocation should be read in conjunction with the Council's Local Plan policy on the Natural Environment and Biodiversity.</p>

Sustainability Appraisal objective	Mansfield Bowling Club N2 (IDS12)	Queen Mary's House N3 (IDS20k)	Hampstead Delivery Office N4 (IDS20l)	Commentary
<p>7 Air quality</p> <p>To improve local air quality and limit exposure</p> <p>a) Contribute to an improvement of air quality?</p> <p>b) Reduce exposure to harmful emissions?</p> <p>c) Support the actions in the Council's Clean Air Action Plan?</p> <p>d) Encourage more trips by walking or cycling?</p>	0	0	+	<p>If the loss of Hampstead Delivery Office is justified this could serve to improve local air quality through reduction of vehicle trips.</p> <p>Improvements and maintenance of existing pedestrian routes will help to encourage more trips by walking.</p>
<p>8 Energy and resources</p> <p>To promote the efficient use of energy, water and other natural resources, throughout the life of the development</p> <p>a) Encourage energy efficiency through passive design measures?</p> <p>b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere?</p> <p>c) Encourage the re-use of resources?</p> <p>d) Ensure reduction of waste during the development process and/or operation?</p> <p>e) Encourage a more efficient supply of resources?</p> <p>f) Encourage sustainable design and construction?</p>	0	+	0	<p>Draft Local Plan policies will require development to be net zero carbon and use resources efficiently. The retention of building/s at Queen Mary's House will help to reduce upfront embodied carbon emissions.</p>
<p>9 Water</p> <p>To protect and manage water (including groundwater)</p>	0	0	0	<p>Both Queen Mary's House and Hampstead Delivery Office are located above Camden's Secondary A aquifer. Policy requirements in the new draft plan would need to be taken into consideration for any application.</p>

Sustainability Appraisal objective	Mansfield Bowling Club N2 (IDS12)	Queen Mary's House N3 (IDS20k)	Hampstead Delivery Office N4 (IDS20l)	Commentary
a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)				
10 Climate resilience To ensure our buildings and environment can adapt to a changing climate a) Take into account potential flood risk? b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk c) Reduce flood risk? d) Ensure buildings are designed to adapt to warmer summers and increased flood events? e) Provide planting / greening that is more resilient to the changing climate	-	0	-	Both Mansfield Bowling club and Hampstead Delivery Office are in an area at risk of flooding as defined by current Local Plan policy CC3 Water and flooding. The site allocations should take this into account.
11 Design To promote high quality and sustainable urban design a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?	+	+	+	Allocations for Queen Mary's House, Mansfield Bowling Club, and Hampstead Delivery Office seek to ensure any development is designed to respect existing townscape character and scale.

Sustainability Appraisal objective	Mansfield Bowling Club N2 (IDS12)	Queen Mary's House N3 (IDS20k)	Hampstead Delivery Office N4 (IDS20l)	Commentary
b) Ensure enhancement of the public realm and local distinctiveness? c) Encourage the use of sustainable design and construction methods?				
12 Historic environment To protect and enhance the historic environment a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value? b) Help ensure new development maintains local character and respects existing high quality townscape? c) Encourage heritage-led regeneration? d) Help provide solutions to those assets on the Heritage at Risk register?	0	+	0	The allocation for Queen Mary's House contributes to this objective by seeking to retain building/s of historical interest, and recognising features which need to be protected for listing status.
13 Efficient use of land To ensure new development makes efficient use of land, buildings and infrastructure a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?	+	+	+	The allocation for Queen Mary's House seeks to retain building/s which positively encourages the reuse of buildings. The allocations for Hampstead Delivery office and Mansfield Bowling club serve to maximise existing land for housing.
14 Economic development To encourage and accommodate sustainable economic growth and employment opportunity	+	+	-	Hampstead Delivery Office serves as an employment use in the local area. The allocation recognises that if the operations at the site become surplus, and is justified, the priority use is residential.

Sustainability Appraisal objective	Mansfield Bowling Club N2 (IDS12)	Queen Mary's House N3 (IDS20k)	Hampstead Delivery Office N4 (IDS20l)	Commentary
a) Encourage the retention and growth of existing, locally based industries? b) Accommodate new and expanding businesses? c) Encourage new investment in the local economy and promote development opportunities for employment? d) Ensure the job density is reduced?				This would reduce employment opportunity in the local area.
15 To ensure our designated centres remain sustainable and adaptable for the future a) Encourage occupation of units and reduce vacancy rates? b) Consider changing trends and patterns in how people use the designated centres?	0	0	0	North area site allocations are not located within designated centres.

Central Area site allocation policies

The site allocations in the central area are focussed around the Camden Goods Yard area, Kentish Town, CIP estate regeneration schemes, with other sites also allocated outside of these areas. These sites are appraised below.

Site allocations in the Camden Goods Yard area

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p> <p>c) Provide housing for people, particularly families, on moderate and lower incomes?</p> <p>d) Encourage development at an appropriate density, standard, size and mix?</p> <p>e) Provide everybody with the opportunity to live in a better home?</p>	++	+	+	+	+	+	<p>Morrisons supermarket allocation facilitates the delivery a significant proportion of self-contained homes to meet local needs. This site makes a significant contribution to the Councils housing supply, with the permitted scheme (2020/3116/P) delivering 644 homes. Should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including the on-site affordable housing) to be maintained or increased and the key benefits for the wider area to be delivered.</p> <p>Planning permission has been granted for an employment use at Morrisons Petrol Station however the allocation recognises that any future</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
							<p>applications should consider the delivery of self-contained homes.</p> <p>Juniper Crescent and Gilbeys Yard expect a significant number of new homes to be provided that meet the Borough's needs. 290 additional homes are identified at Juniper Crescent and 120 additional homes at Gilbeys yard. Re-provision of homes for existing residents living on the estate is expected. It sets out a preference of larger socially-rented homes to be provided.</p> <p>All sites within the Camden Goods Yard area seek to provide homes to meet local need and as such make a positive effect on this objective.</p>
<p>2 Healthy communities</p> <p>To promote a healthy community</p> <p>a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles?</p> <p>b) Provide opportunities and infrastructure that make the use of</p>	++	+	+	+	+	+	<p>Morrisons Supermarket - The policy expects safe and legible pedestrian and cycle routes to be provided, in particular a north-south spinal route for pedestrians and cyclist from Oval Road/ Gilbeys Yard to Juniper Crescent. It also promotes the provision of a high quality realm with good natural surveillance. The allocation expects delivery</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
<p>walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p> <p>e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p>							<p>of public open space that provide for a range of activities and are inclusive.</p> <p>Allocations C8, C9, C10, and C11, contribute positively to this objective through provision of infrastructure that supports walking and cycling. C9 and C11 expects the redeveloped estate to be a healthy and green place with open spaces re-provided/enhanced and additional space to meet demand from new occupiers. A key objective of C10 is to address the estate's physical and social separation through new routes and capacity building. It also seeks to ensure that sufficient community facilities and services are included within the estate</p>
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p> <p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p>	+	+	+	+	+	+	<p>The site allocations within Camden Goods Yard area contribute to improving social exclusion through encouraging development, providing access to open space, and encouraging greater movement by walking and cycling.</p> <p>A requirement to provide a Community Support and</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
<p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access</p> <p>d) Encourage development opportunities in those areas in need of economic development?</p>							<p>Engagement Plan to give residents a strong sense of ownership of streets/spaces, helping to tackle anti-social behaviour.</p>
<p>4 Amenity</p> <p>To improve amenity by minimising the impacts associated with development</p> <p>a) Ensure that the amenity of neighbours is not unduly impacted?</p> <p>b) Ensure that development and operations will not affect noise sensitive uses?</p>	-	-	-	-	-	-	<p>All sites could lead to temporary negative impacts on amenity during construction. Any such impacts will be managed and mitigated through Local Plan Policies on amenity.</p> <p>All site allocations in the Camden Goods Yard area seek to provide homes or student accommodation. The Camden Goods Yard area is mostly sited adjacent to a railway, and in a Town Centre, with active day and night time uses. Effective mitigation and control is required to ensure residential amenity will not be harmed.</p> <p>Policy C7 gives consideration of uses which may not be appropriate for a residential area and that are already</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
							<p>accommodated within the designated centre nearby.</p> <p>The allocations at Juniper Crescent requires development to explore opportunities for optimising the location of bus stops/stands servicing the Morrisons supermarket site and wider Goods Yard area to minimise impacts on resident amenity and quality of place</p>
<p>5 Open space</p> <p>To conserve and improve open space provision</p> <p>a) Help to protect, increase/improve open space?</p>	+	+	+	+	0	+	<p>Allocation C7 creates the opportunity to provide a significant proportion of public open space to serve wider needs of the local community.</p> <p>C8 aims to create a strong gateway to the Camden Goods Yard area. It seeks to manage the deficiencies of this area including the amount of space given over to highway and achieve a better relationship with 100 Chalk Farm Road (C9). It is likely that the public realm in and around these sites will be enhanced.</p> <p>C10 and C12 require the reprovision/ enhancement of existing spaces and additional</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
							spaces to serve the additional population. Taller buildings could negatively impact the enjoyment of existing open spaces through decreased sunlight levels and possible wind tunnels. Further detailed assessment in accordance with the Local Plan would be required.
<p>6 Biodiversity</p> <p>To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.</p> <p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan?</p> <p>b) Provide for the protection of biodiversity and open space in the borough?</p> <p>c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity?</p> <p>d) Provide for new re-naturalised areas?</p>	0	0	0	0	+	+	<p>The allocations in the Camden Goods Yard area that are sited along the railway edge should include provision of open spaces for wildlife and new natural greenspace.</p> <p>C12 states the railway edge should form part of a continuous wildlife corridor along the West Coast Main Line. C11 also requires a green corridor to be provided to connect with planting along the railway edge on neighbouring land.</p> <p>A taller building could negatively impact biodiversity through decreased sunlight levels. C8 is next to the canal, the impact of a taller building on the canal (biodiversity and water quality) would need to be considered.</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
e) Protect and provide for the protection and planting of more trees in the borough?							This is covered by Local Plan policy D1 Design 'the degree to which the building overshadows public spaces, especially open spaces and watercourses;'
7 Air quality To improve local air quality and limit exposure a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage more trips by walking or cycling?	0	0	0	0	0	0	<p>The allocations in Camden Goods Yard will generate a number of sensitive occupiers in an area close to a designated Town Centre, main road, and rail.</p> <p>It is important that an area wide Air Quality Assessment is made to ensure there would be no deterioration of local air quality, and strive to improve the current situation.</p> <p>Reduction of vehicles and delivery management would help to reduce harmful emissions and greater attention to walking and cycling should support active travel.</p> <p>The proportion of development cumulatively will likely give rise to short to medium term negative impacts – these should be effectively mitigated through existing planning policies.</p>
8 Energy and resources	0	0	0				Draft Local Plan policies will require development to be net

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
<p>To promote the efficient use of energy, water and other natural resources, throughout the life of the development</p> <p>a) Encourage energy efficiency through passive design measures?</p> <p>b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere?</p> <p>c) Encourage the re-use of resources?</p> <p>d) Ensure reduction of waste during the development process and/or operation?</p> <p>e) Encourage a more efficient supply of resources?</p> <p>f) Encourage sustainable design and construction?</p>							zero carbon and use resources efficiently.
<p>9 Water</p> <p>To protect and manage water (including groundwater)</p> <p>a) Promote the sustainable use of water resources?</p> <p>b) Encourage development that incorporates sustainable drainage?</p> <p>c) Promote the protection and enhancement of the quality of Camden's waterways?</p>	0	0	0	0	0	0	Allocations in the Camden Goods Yard area would need to respond to policies in the Local Plan on water protection and flooding.

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)							
<p>10 Climate resilience</p> <p>To ensure our buildings and environment can adapt to a changing climate</p> <p>a) Take into account potential flood risk?</p> <p>b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk</p> <p>c) Reduce flood risk?</p> <p>d) Ensure buildings are designed to adapt to warmer summers and increased flood events?</p> <p>e) Provide planting / greening that is more resilient to the changing climate</p>	-	-	-	-	-	-	<p>Environment Agency surface water flood maps indicate high risk at the edge of the Morrisons Supermarket, and Petrol filling station. Allocations in the Camden Goods Yard area are located in an area with a high proportion of reported incidents of sewer flooding. These sites may need to undertake a Flood Risk Assessment, taking into consideration the Council's SFRA and Local Plan policy on flood risk.</p> <p>The design of buildings and spaces between buildings in this development area should seek to promote natural cooling through appropriate greening, materials, design, and finishes.</p>
<p>11 Design</p> <p>To promote high quality and sustainable urban design</p> <p>a) Provide for a high quality of urban design, taking into consideration the</p>	++	+	+	+	+	+	<p>C8 expects a new neighbourhood to be provided on this site with a character of its own which should make sense of the site's history as a goods yard. It is also expected that</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
<p>characteristics of the existing townscape?</p> <p>b) Ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Encourage the use of sustainable design and construction methods?</p>							<p>future development will be successfully integrated with existing neighbourhoods and address the site's separation. The public realm will be expected to be high quality.</p> <p>C9 expects an inviting gateway to be provided with architecture on this site to be of the highest standard to ensure development acts a visible marker for the entrance to the wider Goods Yard. It also is intended to address the existing poor relationship with 100 Chalk Farm Road C9.</p> <p>C10 expects development to resolve the estate's existing physical – and psychological separation from neighbouring areas. The design should also express the estate's historic role as part of the former goods yard. Issues surrounding existing street clutter, blocked/restricted sightlines and community safety must be addressed. C11 expects development to consider its relationship with the adjacent site, C10.</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
							Gilbeys Yard expects development to respond to the industrial character of the canal side environment and wider Goods Yard in terms of the architectural design and landscaping while taking opportunities to preserve, repair and enhance heritage features above and below ground and protecting locally important views.
<p>12 Historic environment</p> <p>To protect and enhance the historic environment</p> <p>a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?</p> <p>b) Help ensure new development maintains local character and respects existing high quality townscape?</p> <p>c) Encourage heritage-led regeneration?</p> <p>d) Help provide solutions to those assets on the Heritage at Risk register?</p>	++	+	+	0	+	+	<p>The allocations in Camden Goods Yard are within Archaeological Priority Area Tier II.</p> <p>Morrisons Supermarket - Development is expected to make sense of the site's history as a goods yard and celebrate its industrial heritage. This means taking opportunities to reference both local and lost heritage features and better reveal and enhance the setting of neighbouring historic assets. The policy also supports proposals to open up the subterranean architecture and vaults, such as the 'Winding Vaults'.</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
							<p>C8 and C9 expects building design to respond to the area’s historic context and consider the impact on locally important views and setting of the Stables Market/Horse Hospital and listed walls.</p> <p>C9 also expects the setting/gap between this site and The Roundhouse to be protected. C11 includes consideration of the Roundhouse for locally important views.</p> <p>C8, C9, and CGY12 are located within Regents Canal Conservation Area. There are a number of historic buildings within or next to the Camden Goods Yard Area (The Roundhouse, Stables Market, Camden Incline Winding House, Hampstead Road Lock, The Interchange, and Stanley Sidings. Proposals for tall buildings could impact the settings of these heritage assets, any positive or negative impact would need assessment through detailed planning, this should also consider cumulative impact</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
<p>13 Efficient use of land</p> <p>To ensure new development makes efficient use of land, buildings and infrastructure</p> <p>a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</p> <p>b) Ensure efficient use of land through maximising densities where appropriate?</p>	+	+	+	+	+	+	Intensification of rather low density sites is promoted through these policies, making more efficient use of land.
<p>14 Economic development</p> <p>To encourage and accommodate sustainable economic growth and employment opportunity</p> <p>a) Encourage the retention and growth of existing, locally based industries?</p> <p>b) Accommodate new and expanding businesses?</p> <p>c) Encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Ensure the job density is reduced?</p>	+	+	+	+	+	+	<p>The allocations in the Camden Goods Yard area include provision for the retention and growth of employment. These serve positively in response to SA objective on economic development.</p> <p>Planning permission has been granted at the Petrol Station site for an office building with retail and food and drink uses on lower floors. The allocation requires further consideration / integration with permanent self-contained homes should a further application be submitted. This would reduce the proportion of employment floorspace but not to a significant proportion that</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
							<p>would negatively impact the expansion of employment in the local area.</p> <p>C9 protects the existing employment floorspace on this site but potentially will deliver more. Appropriate town centres uses are expected at ground floor level. The allocation at 100 Chalk Farm Road seeks to ensure that existing night time uses will not be unduly impacted by the introduction of residential.</p> <p>C10 limited provision of commercial, retail, café and community uses is supported at ground floor level to bring life to principal streets and spaces. This activity could potentially provide opportunities for local businesses and people living on the estate.</p>
<p>15 To ensure our designated centres remain sustainable and adaptable for the future</p> <p>a) Encourage occupation of units and reduce vacancy rates?</p> <p>b) Consider changing trends and patterns in how people use the designated centres?</p>	+	+	+	0	0		<p>The allocations in the Camden Goods Yard area are either within or just outside the designated Town Centre. Uses allocated should serve to support the function of the centre.</p>

Sustainability Appraisal objective	Morrisons C7 (CGY2)	Former Morrisons Petrol Station C8 (CGY3)	100 Chalk Farm Road C9 (CGY4)	Juniper Crescent C10 (CGY5)	Network Rail land at Juniper Crescent C11 (CGY6)	Gilbeys Yard C12 (CGY7)	Commentary
							It is not intended to extend the Town Centre in Juniper Crescent.

Site allocations in the Kentish Town area

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <ul style="list-style-type: none"> a) Provide adequate housing completions to meet local needs b) Protect and promote affordable housing development c) Provide housing for people, particularly families, on moderate and lower incomes? d) Encourage development at an appropriate density, standard, size and mix? e) Provide everybody with the opportunity to live in a better home? 	++	++	+	+	+	<p>All allocations in the Kentish Town Area provide additional housing to meet local need in accordance with the housing policies of the Local Plan. Both allocations at Regis Road and Murphy’s facilitate the delivery of a significant proportion of self-contained homes to meet local needs.</p> <p>These sites make a positive effect on the housing objective.</p>

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
<p>2 Healthy communities</p> <p>To promote a healthy community</p> <p>a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles?</p> <p>b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p> <p>e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p>	+	+	0	+	+	<p>Policy C2 promotes new attractive pedestrian / cycling routes through the site and to link with neighbouring areas. It expects substantial new public open spaces, consideration of a new public square.</p> <p>Policy C3 promotes pedestrian / cycling routes through the site and to link with neighbouring areas and a green connection between Kentish Town and Hampstead Heath. It expects substantial new public open space, and for design to minimise vehicle movements and parking.</p> <p>Community aspirations for C5 would help to facilitate a public square and improve public safety.</p> <p>These policies should therefore encourage active modes of travel, create spaces for recreation that act as a focus for community activity.</p>
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p> <p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p>	+	+	+	+	+	<p>Policy C2 promotes routes linking Kentish Town and Gospel Oak, reducing community severance and isolation. It expects substantial new public open spaces and consideration of a new public square to act as a focus for community activity. It should therefore contribute towards social inclusion and cohesion.</p> <p>Policy C3 promotes the creation of additional access points into the area to substantially improve connections to the surrounding area and adjacent communities, reducing community</p>

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
<p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access</p> <p>d) Encourage development opportunities in those areas in need of economic development?</p>						<p>severance and isolation. It expects substantial new public open space which can provide a focus for the community and contribute towards social inclusion and cohesion. The site is expected to improve access to Kentish Town Thameslink Station.</p> <p>The presence of the Metropolitan Police Station is intended to continue in Kentish Town. The allocation seeks to rationalise the site using more redundant buildings and space to support provision of permanent self contained homes.</p> <p>Policy C5 expects development to contribute towards the widening of the adjacent pavement and the relocation of the bus shelter, consistent with aspirations for a new Kentish Town Square, as identified in the Kentish Town Neighbourhood Plan, which is intended to act as a community focus, aiding social cohesion.</p> <p>It also expects development to be designed to enable the future delivery of a route to link Kentish Town Station to Hampstead Heath through the Murphy site, which will improve access between communities.</p> <p>The Fire Station site in Kentish Town offers an opportunity to rationalise to provide replacement facilities and provide housing. If however the Fire Station use in Kentish Town is demonstrated surplus to needs further assessment into the continued use for community use and / or housing will be required.</p>
4 Amenity	-	-	-	-	-	All sites could lead to temporary negative impacts on amenity during construction. Any such impacts

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
<p>To improve amenity by minimising the impacts associated with development</p> <p>a) Ensure that the amenity of neighbours is not unduly impacted?</p> <p>b) Ensure that development and operations will not affect noise sensitive uses?</p>						<p>will be managed and mitigated through Local Plan Policies on amenity.</p> <p>Allocations C2 and C3 should ensure that the introduction of housing does not negatively affect the continued operation of employment and industry.</p> <p>Both the police and fire station could give rise to noise and disturbance issues. It will be important that the introduction of housing at these sites do not compromise their continued operation.</p>
<p>5 Open space</p> <p>To conserve and improve open space provision</p> <p>a) Help to protect, increase/improve open space?</p>	+	+	0	+	0	<p>Allocations at Regis Road and Holmes Road Depot, and Murphy's expect substantial new public open spaces in on sites with limited green space. Therefore, the overall impact of these policies on this objective is considered to be positive.</p> <p>Community aspirations for C5 would help facilitate the development of a public square for Kentish Town.</p> <p>Taller buildings could give rise to negative effects on the enjoyment of existing open spaces from decreased levels of sunlight and creation of wind tunnels. Biodiversity could also be negatively impacted in the same way. It is expected that such developments will be assessed against Local Plan Policies.</p>
<p>6 Biodiversity</p> <p>To protect and enhance existing habitats and biodiversity and to</p>	++	++	0	0	+	<p>The allocation at Regis Road and Holmes Road Depot, and Murphy's provides clear policy criteria for biodiversity given its location next to a Grade I SIN.</p>

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
<p>seek to increase these where possible.</p> <p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan?</p> <p>b) Provide for the protection of biodiversity and open space in the borough?</p> <p>c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity?</p> <p>d) Provide for new re-naturalised areas?</p> <p>e) Protect and provide for the protection and planting of more trees in the borough?</p>						<p>Existing trees at Kentish Town Fire Station are required to be retained in the allocation in addition to providing new planting and landscaping. This should help to retain and improve local biodiversity.</p>
<p>7 Air quality</p> <p>To improve local air quality and limit exposure</p> <p>a) Contribute to an improvement of air quality?</p> <p>b) Reduce exposure to harmful emissions?</p> <p>c) Support the actions in the Council's Clean Air Action Plan?</p>	+	+	0	0	0	<p>The allocations in the Kentish Town area are next to a railway and near a busy Town Centre, but are not sited in an Air Quality Focus Area.</p> <p>Policy C2 and C3 expect development to be designed to minimise vehicle movements and parking and provide new attractive pedestrian / cycling routes through the site and to link with neighbouring areas. It will therefore contribute towards reducing vehicle emissions and encouraging non-car modes of travel.</p>

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
d) Encourage more trips by walking or cycling?						The proportion of development cumulatively will likely give rise to short to medium term negative impacts from construction – these should be effectively mitigated through existing planning policies.
8 Energy and resources To promote the efficient use of energy, water and other natural resources, throughout the life of the development a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction?	0	0	0	0	0	Draft Local Plan policies will require development to be net zero carbon and use resources efficiently. The Council's recycling and reuse centre is located on the Regis Road allocation. Policy C2 requires its retention or re-provision.
9 Water To protect and manage water (including groundwater)	0	0	0	0	0	Allocations in Kentish Town area would need to respond to policies in the Local Plan on water protection and flooding.

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)						
10 Climate resilience To ensure our buildings and environment can adapt to a changing climate a) Take into account potential flood risk? b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk c) Reduce flood risk? d) Ensure buildings are designed to adapt to warmer summers and increased flood events? e) Provide planting / greening that is more resilient to the changing climate	-	-	-	-	-	Site allocations C5 and C6 are located on a previously flooded street. Murphy's Yard is located next to a Local Flood Risk Zone. The historic flow path of the River Fleet ran around the east of both Murphy's Yard and Regis Road, also affecting C4. The Environment Agency surface water flood maps show both Murphy's Yard and Regis Road having a low to high flood risk from surface water. A Flood Risk Assessment will need to be carried out in accordance with the Local Plan. The design of buildings and spaces between buildings in this development area should seek to promote natural cooling through appropriate greening, materials, design, and finishes.

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
<p>11 Design</p> <p>To promote high quality and sustainable urban design</p> <p>a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</p> <p>b) Ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Encourage the use of sustainable design and construction methods?</p>	+	+	+	+	+	<p>Regis Road and Murphy's allocations seek to positively improve the connections and public spaces across the site to better integrate with the wider area.</p> <p>C3 takes into account the community's desire to maintain the view across the site towards Parliament Hill from the area adjacent to Kentish Town Station.</p> <p>Allocations C4, C5, and C6 seek to ensure development positively responds to the street and enhances the public realm.</p>
<p>12 Historic environment</p> <p>To protect and enhance the historic environment</p> <p>a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?</p> <p>b) Help ensure new development maintains local character and respects existing high quality townscape?</p> <p>c) Encourage heritage-led regeneration?</p> <p>d) Help provide solutions to those assets on the Heritage at Risk register?</p>	0	+	+	+	+	<p>A small corner of the Regis Road and Holmes Road Depot site allocation and Murphy Site falls within a Tier 2 Archaeological Priority Area.</p> <p>Murphy Site is next to Grade II Listed 'Kentish Town Cinema' and 23 Christ Apostolic Church'. There is a locally listed group of buildings within Murphy's Yard (81 Highgate Road). C3 takes account of these designations and seeks to positively respond to them and the local history of the area.</p> <p>C4 contains a Grade II Listed Police Station. Proposals for tall buildings could impact the settings of these heritage assets, any positive or negative impact would need assessment through detailed planning, this should also consider cumulative impact.</p> <p>Policy C4 states that development must preserve the listed police station and not harm its setting. Policy C6 expects development to enhance the</p>

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
						setting of the adjacent listed Christ Apostolic Church and neighbouring locally listed buildings.
13 Efficient use of land To ensure new development makes efficient use of land, buildings and infrastructure a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?	+	+	+	+	+	Intensification of rather low density sites is promoted through these policies, making more efficient use of land.
14 Economic development To encourage and accommodate sustainable economic growth and employment opportunity a) Encourage the retention and growth of existing, locally based industries? b) Accommodate new and expanding businesses? c) Encourage new investment in the local economy and promote development opportunities for employment? d) Ensure the job density is reduced?	+	+	+	+	+	Regis Road and Murphy's land uses are predominately employment based, providing a number of commercial units, with logistics, manufacturing and other businesses. Businesses on Regis Road make an important contribution to Camden's economy and some support the operation of London's Central Activities Zone. Murphy's is within the Council's designated industry area. The allocation at Regis Road Holmes Road Depot and Murphy's seek to intensify the industrial and employment uses and include a significant proportion of homes. In the short to medium term this could have a negative effect on existing and locally based industries in the longer term however the allocation could help to strengthen the resilience of this employment area. The provision of homes must not affect the operation of employment and industry.

Sustainability Appraisal objective	Regis Road and Holmes Road Depot C2 (KT2)	Murphy site C3 (KT3)	Kentish Town Police Station C4 (KT4)	369 – 377 Kentish Town Road C5 (KT5)	Kentish Town Fire Station C6 (KT6)	Commentary
<p>15 To ensure our designated centres remain sustainable and adaptable for the future</p> <p>a) Encourage occupation of units and reduce vacancy rates?</p> <p>b) Consider changing trends and patterns in how people use the designated centres?</p>	+	+	+	0	0	The allocations in the Kentish Town area are either within or just outside the designated Town Centre. Uses allocated should serve to support the function of the centre.

Camden CIP Estate Regeneration Schemes

Sustainability Appraisal objective	West Kentish Town Estate C13 (IDS13)	Wendling Estate and St Stephens Close C14 (IDS11)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p> <p>c) Provide housing for people, particularly families, on moderate and lower incomes?</p> <p>d) Encourage development at an appropriate density, standard, size and mix?</p> <p>e) Provide everybody with the opportunity to live in a better home?</p>	++	++	Both allocations at West Kentish Town Estate and Wendling and St Stephen's Close promote the intensification of an existing housing estate developed at a low density for its location. The allocations are expected to re-provide existing housing to meet resident needs and seek to maximise additional affordable housing.
<p>2 Healthy communities</p>	+	+	C13 and C14 specifically mention the need to create a safe, welcoming, attractive environment and establish

Sustainability Appraisal objective	West Kentish Town Estate C13 (IDS13)	Wendling Estate and St Stephens Close C14 (IDS11)	Commentary
<p>To promote a healthy community</p> <p>a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles?</p> <p>b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p> <p>e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p>			<p>a clear network streets and spaces including space to relax, play and grow food. These points specifically support objectives around social exclusion, design and healthy communities.</p> <p>The existing design means that Wendling Estate is very inward looking, turning its back on the surrounding roads and railway and connectivity from one side to the other is poor, leading to wider issues of dead ends, poor passive surveillance and antisocial behaviour. The allocation requires that the development is framed to design out crime and anti-social behaviour.</p>
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p> <p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p> <p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access</p> <p>d) Encourage development opportunities in those areas in need of economic development?</p>	+	+	<p>The areas high level of deprivation and housing challenges are recognised. Housing needs of existing residents will be taken into consideration. Development is expected to provide safe and legible walking routes and address a lack in provision of public open space and improvements needed to the public realm.</p> <p>Improvements to Queens Crescent neighbourhood centre will be sought.</p> <p>The allocation at Wendling will seek to ensure the re-provision and enhancement of health and community facilities.</p> <p>These enhancements should work to promote social inclusion and develop spaces where the community can interact.</p>
<p>4 Amenity</p>	0	0	<p>Both sites could lead to temporary negative impacts on amenity during construction. Any such impacts should</p>

Sustainability Appraisal objective	West Kentish Town Estate C13 (IDS13)	Wendling Estate and St Stephens Close C14 (IDS11)	Commentary
<p>To improve amenity by minimising the impacts associated with development</p> <p>a) Ensure that the amenity of neighbours is not unduly impacted?</p> <p>b) Ensure that development and operations will not affect noise sensitive uses?</p>			<p>be managed and mitigated in accordance with Local Plan policies.</p>
<p>5 Open space</p> <p>To conserve and improve open space provision</p> <p>a) Help to protect, increase/improve open space?</p>	0	0	<p>The allocations could do more to strengthen the focus on improving local open space.</p> <p>The open spaces in Gospel Oak and Haverstock are of varying size and quality. Many are small, undefined, underused and/or poorly overlooked. There are large areas of housing estate amenity land which are not always well defined as well as open spaces designated on Camden's Local Plan Policies Map. Larger/designated spaces such as Lismore Circus and Gospel Oak open space can potentially be enhanced to deliver an optimal range of benefits for the community and their role strengthened as local 'destinations'. There is also an imbalance in the types of open space provided with provision for older children focussed heavily towards Multi-Use Games Areas. Improving open spaces would deliver benefits for health and wellbeing and links connecting individual spaces for walking and cycling will be important.</p>
<p>6 Biodiversity</p> <p>To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.</p> <p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan?</p>	0	0	<p>There are no local designated areas for biodiversity. Local Plan policies on enhancing biodiversity will apply.</p>

Sustainability Appraisal objective	West Kentish Town Estate C13 (IDS13)	Wendling Estate and St Stephens Close C14 (IDS11)	Commentary
b) Provide for the protection of biodiversity and open space in the borough? c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity? d) Provide for new re-naturalised areas? e) Protect and provide for the protection and planting of more trees in the borough?			
7 Air quality To improve local air quality and limit exposure a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage more trips by walking or cycling?	0	0	Temporary and short term negative impacts on air quality during the demolition and construction will be managed and mitigated through Local Plan Policies. Improvements and maintenance of existing pedestrian routes will help to encourage more trips by walking.
8 Energy and resources To promote the efficient use of energy, water and other natural resources, throughout the life of the development a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction?	0	0	Draft Local Plan policies will require development to be net zero carbon and use resources efficiently.

Sustainability Appraisal objective	West Kentish Town Estate C13 (IDS13)	Wendling Estate and St Stephens Close C14 (IDS11)	Commentary
<p>9 Water</p> <p>To protect and manage water (including groundwater)</p> <p>a) Promote the sustainable use of water resources?</p> <p>b) Encourage development that incorporates sustainable drainage?</p> <p>c) Promote the protection and enhancement of the quality of Camden's waterways?</p> <p>d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)</p>	0	0	Site allocations are not located above protected groundwater sources. Local Plan policies will apply for Managing water and flood risk.
<p>10 Climate resilience</p> <p>To ensure our buildings and environment can adapt to a changing climate</p> <p>a) Take into account potential flood risk?</p> <p>b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk</p> <p>c) Reduce flood risk?</p> <p>d) Ensure buildings are designed to adapt to warmer summers and increased flood events?</p> <p>e) Provide planting / greening that is more resilient to the changing climate</p>	-	-	<p>Wendling and St Stephens Close is located in a Local Flood Risk Zone, with a previously flooded street (2002). A historic flow path of the River Fleet runs around both West Kentish Town and Wendling and St Stephens Close. Environment Agency Surface water flood maps show low to high risk areas of flooding within both site allocations.</p> <p>Measures to reduce flood risk to existing and future occupiers should be sought. A flood risk assessment will be required as part of any planning application.</p> <p>The design of buildings and spaces between buildings in this development area should seek to promote natural cooling through appropriate greening, materials, design, and finishes.</p>
<p>11 Design</p> <p>To promote high quality and sustainable urban design</p>	+	+	Allocations at West Kentish Town and Wendling and St Stephens Close seek to ensure development respects the existing townscape, particularly where taller buildings are proposed. Allocations have the

Sustainability Appraisal objective	West Kentish Town Estate C13 (IDS13)	Wendling Estate and St Stephens Close C14 (IDS11)	Commentary
a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Ensure enhancement of the public realm and local distinctiveness? c) Encourage the use of sustainable design and construction methods?			potential to affect the LVMF Parliament Hill panorama – this has been taken into consideration.
12 Historic environment To protect and enhance the historic environment a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value? b) Help ensure new development maintains local character and respects existing high quality townscape? c) Encourage heritage-led regeneration? d) Help provide solutions to those assets on the Heritage at Risk register?	+	+	Reference is made to the existing character of the estates and opportunities to create attractive environments and reintroduce historic street patterns. C14 is sited near Grade II* Listed Roman Catholic Priory Church of St Dominic, and 1 – 17 Southampton Row Local List. GHO2 is sited near Grade II Listed Rhyl Primary School and Nursery, and Local List (84 Warden Road, 73 Grafton Road, 61 and 61a Grafton Road). Proposals for tall buildings could impact the settings of these heritage assets, any positive or negative impact would need assessment through detailed planning, this should also consider cumulative impact.
13 Efficient use of land To ensure new development makes efficient use of land, buildings and infrastructure a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?	+	+	The policies promotes the intensification of an area in low density use, therefore it will make more efficient use of the borough's limited land.
14 Economic development	+	+	The allocations are housing led however, the focus on improvements to walking and cycling routes and

Sustainability Appraisal objective	West Kentish Town Estate C13 (IDS13)	Wendling Estate and St Stephens Close C14 (IDS11)	Commentary
<p>To encourage and accommodate sustainable economic growth and employment opportunity</p> <p>a) Encourage the retention and growth of existing, locally based industries?</p> <p>b) Accommodate new and expanding businesses?</p> <p>c) Encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Ensure the job density is reduced?</p>			<p>increased sense of safety should help to increase footfall to Queens Crescent, Lismore Circus and Mansfield Road Neighbourhood Centres.</p>
<p>15 To ensure our designated centres remain sustainable and adaptable for the future</p> <p>a) Encourage occupation of units and reduce vacancy rates?</p> <p>b) Consider changing trends and patterns in how people use the designated centres?</p>	+	+	<p>The allocations could help to ensure designated neighbourhood centres remain sustainable with an increase in housing in the local area and improved walking and cycling routes to access these destinations.</p>

Other site allocations in the Central area

Sustainability Appraisal objective	Shirley House C15 (IDS5)	Camden Town over station C16 (IDS6)	UCL Camden Campus, 109 Camden Road C17 (IDS20e)	Arlington Road former depot C18 (IDS20f)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p> <p>c) Provide housing for people, particularly families, on moderate and lower incomes?</p> <p>d) Encourage development at an appropriate density, standard, size and mix?</p> <p>e) Provide everybody with the opportunity to live in a better home?</p>	+	+	+	+	<p>Shirley House, Camden Town overstation, and Arlington Road depot allocations are existing employment sites that has the opportunity to provide a mix of permanent self-contained housing.</p> <p>109 Camden Road provides student accommodation. The allocation seeks to make more efficient use of land and provide additional student accommodation.</p> <p>These sites make a positive effect on the housing objective.</p>
<p>2 Healthy communities</p> <p>To promote a healthy community</p> <p>a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles?</p> <p>b) Provide opportunities and infrastructure that make the use of</p>	0	0	0	+	<p>To create activity at street level and increase natural surveillance an element of shopping or food and drink uses have been incorporated in the allocation of Shirley House.</p> <p>Improved street layout for ease of walking would contribute positively to this objective at C16 and Arlington Road depot.</p>

Sustainability Appraisal objective	Shirley House C15 (IDS5)	Camden Town over station C16 (IDS6)	UCL Camden Campus, 109 Camden Road C17 (IDS20e)	Arlington Road former depot C18 (IDS20f)	Commentary
<p>walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p> <p>e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p>					
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p> <p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p> <p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access</p> <p>d) Encourage development opportunities in those areas in need of economic development?</p>	0	+	0	0	C16 seeks to address existing access issues at the station and connecting streets. Improving the inclusivity of this central location would act positively for local residents, those who visit and work in the local area.
<p>4 Amenity</p>	-	-	-	-	All sites could lead to temporary negative impacts on amenity during construction. Any such impacts will be

Sustainability Appraisal objective	Shirley House C15 (IDS5)	Camden Town over station C16 (IDS6)	UCL Camden Campus, 109 Camden Road C17 (IDS20e)	Arlington Road former depot C18 (IDS20f)	Commentary
<p>To improve amenity by minimising the impacts associated with development</p> <p>a) Ensure that the amenity of neighbours is not unduly impacted?</p> <p>b) Ensure that development and operations will not affect noise sensitive uses?</p>					<p>managed and mitigated through Local Plan Policies on amenity.</p> <p>C16 is sited in a busy Town Centre location with an active night time economy any housing should be designed to ensure amenity is not unduly impacted.</p> <p>109 Camden Road seeks to increase the resident student population – this should ensure neighbouring amenity is managed.</p>
<p>5 Open space</p> <p>To conserve and improve open space provision</p> <p>a) Help to protect, increase/improve open space?</p>	0	0	0	0	<p>Provision for open space at these sites are limited. Local Plan policy for open space will apply.</p>
<p>6 Biodiversity</p> <p>To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.</p> <p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan?</p> <p>b) Provide for the protection of biodiversity and open space in the borough?</p> <p>c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity?</p>	+	0	0	0	<p>The allocation at Shirley House provides clear policy criteria for biodiversity – it is located next to the canal and its impact on biodiversity and opportunities to enhance biodiversity are included.</p>

Sustainability Appraisal objective	Shirley House C15 (IDS5)	Camden Town over station C16 (IDS6)	UCL Camden Campus, 109 Camden Road C17 (IDS20e)	Arlington Road former depot C18 (IDS20f)	Commentary
d) Provide for new re-naturalised areas? e) Protect and provide for the protection and planting of more trees in the borough?					
7 Air quality To improve local air quality and limit exposure a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage more trips by walking or cycling?	-	-	0	-	The allocations at Shirley House, and Camden Over Station would maintain or increase employment floorspace and introduce sensitive users into an area of poor air quality (within an Air Quality Focus Area). Arlington Road Depot is also within the Air Quality Focus Area. Design and layout are important, and air quality assessment should be undertaken early to ensure any negative impact can be mitigated. Policy on air quality in the Local Plan will apply.
8 Energy and resources To promote the efficient use of energy, water and other natural resources, throughout the life of the development a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources?	0	0	0	0	Draft Local Plan policies will require development to be net zero carbon and use resources efficiently.

Sustainability Appraisal objective	Shirley House C15 (IDS5)	Camden Town over station C16 (IDS6)	UCL Camden Campus, 109 Camden Road C17 (IDS20e)	Arlington Road former depot C18 (IDS20f)	Commentary
d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction?					
9 Water To protect and manage water (including groundwater) a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)	0	0	0	0	Allocations in this area would need to respond to policies in the Local Plan on water protection and flooding.
10 Climate resilience To ensure our buildings and environment can adapt to a changing climate a) Take into account potential flood risk? b) Ensure locations identified for growth and infrastructure are	0	-	-	-	Shirley House has not been identified at risk from flooding however this may change and future applications will be required to screen flood risk from all sources in accordance with Local Plan policy. Kentish Town Road is a previously flooded street, the area has a high number of reports of sewer flooding, and surface water flow maps indicate a medium to high risk for surface water flooding. A Flood Risk Assessment will

Sustainability Appraisal objective	Shirley House C15 (IDS5)	Camden Town over station C16 (IDS6)	UCL Camden Campus, 109 Camden Road C17 (IDS20e)	Arlington Road former depot C18 (IDS20f)	Commentary
<p>located away from areas of high flood risk</p> <p>c) Reduce flood risk?</p> <p>d) Ensure buildings are designed to adapt to warmer summers and increased flood events?</p> <p>e) Provide planting / greening that is more resilient to the changing climate</p>					<p>need to be carried out for Camden Over station development in accordance with the Local Plan.</p> <p>Environment Agency surface water flood maps indicate a medium to high level of flood risk within a small proportion of 109 Camden Road. Further investigation into the level of flood risk is required, an FRA is recommended.</p> <p>Arlington Road Former depot is in an area where a high number of sewer flooding incidents have been reported. Local Plan policies on water and flooding will apply.</p> <p>The design of buildings and spaces between buildings in this development area should seek to promote natural cooling through appropriate greening, materials, design, and finishes.</p>
<p>11 Design</p> <p>To promote high quality and sustainable urban design</p> <p>a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</p> <p>b) Ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Encourage the use of sustainable design and construction methods?</p>	+	+	0	+	<p>The allocation at Shirley House seeks to respond positively to local character and its canal setting.</p> <p>Allocations C16 seek to ensure development positively responds to the street and enhances the public realm.</p> <p>Improvements to the street frontage along Arlington and Jamestown Road will enhance the public realm.</p>
<p>12 Historic environment</p> <p>To protect and enhance the historic environment</p>	0	+	0	+	<p>Grade II Listed Buildings are in close proximity of Shirley House, 17 – 21 Camden Road (Sainsbury's) and Grade II Listed terrace 18 – 63 Camden Road. This is not referenced in the policy.</p>

Sustainability Appraisal objective	Shirley House C15 (IDS5)	Camden Town over station C16 (IDS6)	UCL Camden Campus, 109 Camden Road C17 (IDS20e)	Arlington Road former depot C18 (IDS20f)	Commentary
a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value? b) Help ensure new development maintains local character and respects existing high quality townscape? c) Encourage heritage-led regeneration? d) Help provide solutions to those assets on the Heritage at Risk register?					Allocation at C16 requires development to positively respond to the Camden Town Conservation Area and Regent's Canal Conservation Area. There are locally listed buildings on this site. The allocation at Arlington Road requires consideration of the setting and character of designated conservation areas.
13 Efficient use of land To ensure new development makes efficient use of land, buildings and infrastructure a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?	+	+	+	+	Intensification of sites are promoted through these policies, making more efficient use of land.
14 Economic development To encourage and accommodate sustainable economic growth and employment opportunity a) Encourage the retention and growth of existing, locally based industries?	+	+	0	+	The continued employment use at Shirley House will contribute to economic growth and employment opportunity in the local area – especially with a focus of providing for small and medium enterprises. The allocation at Camden over station development provides for a range of employment uses, giving particular consideration to uses/ activities that have an

Sustainability Appraisal objective	Shirley House C15 (IDS5)	Camden Town over station C16 (IDS6)	UCL Camden Campus, 109 Camden Road C17 (IDS20e)	Arlington Road former depot C18 (IDS20f)	Commentary
b) Accommodate new and expanding businesses? c) Encourage new investment in the local economy and promote development opportunities for employment? d) Ensure the job density is reduced?					<p>established and growing presence in Camden Town, including premises for use by creative and cultural businesses, light industrial workshops, co working space and space suitable for small and medium sized businesses. Mitigation measures are requested to ensure any residential development does not impact continued employment function.</p> <p>It is expected that the allocation at Arlington Road would continue to provide an employment function to maintain employment opportunity in the local area. The introduction of housing at this site should not harm the operation of employment uses.</p>
15 To ensure our designated centres remain sustainable and adaptable for the future a) Encourage occupation of units and reduce vacancy rates? b) Consider changing trends and patterns in how people use the designated centres?	0	+	0	0	<p>Optimising site capacity at Shirley House for employment and housing will help support the function and vitality of nearby Camden Town Centre.</p> <p>The allocation at Camden Town over station will contribute to the sustainable future of Camden Town Centre.</p>

List sites in the Central area

The following sites are further site allocation policies (list sites) in the central area of the borough, many of which are already subject to planning permission. These do not set detailed policy, their intention is to specify safeguarded uses which have generally been agreed through previous allocation or an existing planning permission, as such their appraisal is limited.

	Sustainability Appraisal objectives															
Site reference/ name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Summary of SA commentary
Highgate Centre C9 (KT7)	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	This site sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission.
Grand Union House, 18 – 20 Kentish Town Road, C20 (IDS8)	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	'Grand Union House' forms part of the wider Grand Union group of buildings (together with the Sainsbury supermarket on Camden Road, Grand Union Walk terrace and a small crèche building). Historic England recently decided to list the supermarket and terrace but rejected listing of Grand Union House and the crèche. Planning permission has been granted for 4000 sq m additional employment space and 6 homes subject to S106.
Heybridge garages, Hadley Street, C21 (IDS20g)	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	The site is occupied by a disused underground car park with a high perimeter fence along the southern and western elevations. The list site policy only sets out information on the proposed use of a site and the indicative capacity. This policy promotes residential development on a site that

	Sustainability Appraisal objectives															
Site reference/ name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Summary of SA commentary
																<p>currently has no residential use, as such it will have a minor positive effect on housing objectives.</p> <p>The only perceived negative effect is on objective 4 as the development site is in a predominantly residential area as such there is likely to be a negative impact on amenity during the construction phrase. However, any such impacts will be managed and mitigated through Local Plan Policy.</p> <p>Overall the policy is considered to have a neutral effect in terms of the set objectives.</p>
Bacton Low Rise, Haverstock Road, C22 (IDS20j)	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Planning permission granted for phased development of 128 additional homes.
Former Charlie Ratchford centre, C23 (IDS20m)	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Planning permission granted. Under construction. Providing 115 homes
52 Avenue Road, C24 (IDS20u)	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Planning permission granted – 20 homes.
5-17 Haverstock	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Planning permission granted – 77 homes

	Sustainability Appraisal objectives															
Site reference/ name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Summary of SA commentary
Hill (Eton garages) C25 (new)																

South Area site allocation policies

The site allocations in the south area are focussed around Camley Street and St Pancras Way, Tottenham Court Road and Holborn, with other sites also allocated outside of these areas. These sites are appraised below.

Site allocations around Camley Street and St Pancras Way

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p>	+	++	++	++	+	<p>Policies S4 – S8 all seek to facilitate the delivery of homes on site's that do not currently provide any housing. 104 – 114 Camley Street is identified to provide the most homes (750), which would positively effect the boroughs housing supply. Although these policies do not make any specific commentary regarding levels of affordable housing, the size of units and/or mix they will be used alongside other policies within the adopted development plan that cover these matters.</p> <p>Overall the cumulative impact of these policies on this objective is considered to be positive.</p>

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
c) Provide housing for people, particularly families, on moderate and lower incomes? d) Encourage development at an appropriate density, standard, size and mix? e) Provide everybody with the opportunity to live in a better home?						
2 Healthy communities To promote a healthy community a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles? b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive? c) Support improvements to existing homes (healthy living environment) d) Support health providers and commissioners to fulfil their strategic estates plans? e) Encourage the retention and development of key services (e.g.	+	+	+	+	0	The site covered by policy S7 has been part of the NHS since 1951 and different health and medical related activities have operated out of different buildings and parts of the site. The Trust has started drawing up plans to redevelop the St Pancras Hospital site and reprovide inpatient facilities at a new purpose-built site adjacent to the Whittington Hospital. The NHS in north central London is working with NHS England Specialised commissioning, in partnership with Moorfields Eye Hospital, University College London (UCL) and Moorfields Eye Charity, to develop proposals for bringing together services from Moorfields' main City Road hospital site and the UCL Institute of Ophthalmology in a new purpose-built centre. Their preferred location for this facility is the St Pancras Hospital site. Policy CSP5 specifically facilitates the development of new hospital facilities on the site which will support health providers to fulfil their strategic estates plans. In addition, policies S4 – S8 all set out specific measures for improving and creating new pedestrian and cycle routes through the area, enhancing the

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
shopping, community and leisure facilities)?						<p>public realm, promoting a wider mix of uses on the site and increasing activity at a ground floor level. These measures should make the area feel more welcoming and safer and encourage people living on and around the site use more active modes of travel. S5 seeks to ensure that new neighbourhoods and employment spaces are well connected with community and health facilities.</p> <p>Policy S8 also promotes a new accessible pedestrian access point to St Pancras Gardens which would make walking and use of the Gardens for recreational purposes easier and more attractive.</p> <p>Overall the cumulative impact of these policies on this objective is considered to be positive.</p>
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p> <p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p> <p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access</p>	+	+	+	+	0	<p>Policies S4 – S8 all set out specific measures for improving and creating new pedestrian and cycle routes through the area, enhancing the public realm, promoting a wider mix of uses on the site and increasing activity at a ground floor level. Policies S4 – S8 also make reference to providing an on-site public open space. These measures should make the area feel more welcoming and safer which will encourage people living on and around the site to walk through them, use the facilities and interact with each other.</p> <p>Policy S8 also promotes a new accessible pedestrian access point to St Pancras Gardens which would make it more convenient for people with mobility difficulties to use and access the Gardens.</p> <p>Overall the cumulative impact of these policies on this objective is considered to be positive.</p>

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
d) Encourage development opportunities in those areas in need of economic development?						
4 Amenity To improve amenity by minimising the impacts associated with development a) Ensure that the amenity of neighbours is not unduly impacted? b) Ensure that development and operations will not affect noise sensitive uses?	-	-	-	-	-	<p>The sites identified in policies S4 – S8 are located near to a range of different uses including residential uses. The compact nature of this part of Camden means that there is likely to be some temporary negative impacts on amenity during the construction period. However, any such impacts will be managed and mitigated through Local Plan Policy.</p> <p>The introduction of housing and employment uses could create conflict, this should be mitigated through effective design and management.</p>
5 Open space To conserve and improve open space provision a) Help to protect, increase/improve open space?	+	+	++	+	0	<p>The sites identified in policies S4 – S8 do not have any designated open spaces within them.</p> <p>Policies S4 – S7 specifically reference the need to provide public open space/s on-site to improve the experience from Agar Grove and approach from the south under the adjacent bridge.</p> <p>S6 requires development to provide an inclusive public open space alongside other smaller green spaces.</p> <p>The development of taller buildings could negatively impact the enjoyment of existing open spaces through decreased sunlight levels and possible wind tunnels. Further detailed assessment in accordance with the Local Plan would be required.</p>
6 Biodiversity	0	0	0	0	0	The boundaries for policies S4 – S8 do not overlap/sit within any protected biodiversity areas.

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
<p>To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.</p> <p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan?</p> <p>b) Provide for the protection of biodiversity and open space in the borough?</p> <p>c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity?</p> <p>d) Provide for new re-naturalised areas?</p> <p>e) Protect and provide for the protection and planting of more trees in the borough?</p>						<p>Policies S4 – S7 make references towards improving the public realm, creating new open spaces and maximising opportunities for urban greening but not necessarily in the context of improving the biodiversity value of the site/wider area. Local Plan policies on Biodiversity will need to be applied.</p> <p>S4 and S5 are located on the opposite side of a Grade 2 SINC – 'North London Line at York Way'. The allocation could be strengthened to provide a larger biodiversity corridor along this route.</p>
<p>7 Air quality</p> <p>To improve local air quality and limit exposure</p> <p>a) Contribute to an improvement of air quality?</p> <p>b) Reduce exposure to harmful emissions?</p>	-	-	-	-	-	<p>Temporary negative impacts on air quality will occur during the construction period which will be managed and mitigated through Local Plan Policy.</p> <p>An Air Quality Assessment will need to be undertaken for all sites in accordance with the Local Plan.</p>

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
c) Support the actions in the Council's Clean Air Action Plan? d) Encourage more trips by walking or cycling?						
8 Energy and resources To promote the efficient use of energy, water and other natural resources, throughout the life of the development a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction?	0	0	0	0	0	The boundaries for policies S4 and S5 sit within the Camley Street potential heat network area and S6 and S7 sit in the South Camden potential network area. The site identified in Policy S8 does not sit within an existing or potential heat network area. Draft Local Plan policies will require development to be net zero carbon and use resources efficiently.
9 Water To protect and manage water (including groundwater)	0	0	0	0	0	Allocations in this area would need to respond to policies in the Local Plan on water protection and flooding.

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)						
10 Climate resilience To ensure our buildings and environment can adapt to a changing climate a) Take into account potential flood risk? b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk c) Reduce flood risk? d) Ensure buildings are designed to adapt to warmer summers and increased flood events? e) Provide planting / greening that is more resilient to the changing climate	-	-	-	-	-	Surface water flood maps from the EA show a medium to high risk of flooding at 120 – 136 Camley Street, where the road dips in front of the bridge. 104 – 114 Camley Street is over 1 hectare and EA surface water flood risk maps show a medium to high level of flood risk within the centre of the site. The Parcelforce and ATS Tyre site is within a Local Flood Risk Zone, the historic flow path of the River Fleet runs through it, and it has a medium risk of surface water flooding. St Pancras Hospital is partially within a Local Flood Risk Zone and is over 1 hectare. Shorebase Access is within a Local Flood Risk Zone and has a high risk of surface water flooding, as identified by EA flood risk maps. A Flood Risk Assessment will need to be carried out for these sites in accordance with the Local Plan. These sites introduce housing and propose to intensify employment uses, the FRA must demonstrate that the most vulnerable uses are in

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
						<p>areas at lowest risk of flooding within the site and demonstrate how the development has been designed to be resilient to flooding and set out how the risk of flooding will be mitigated the lifetime of the development, without increasing flood risk elsewhere.</p> <p>The focus of increased greenery and tree lined streets should help provide shade and promote cooling in the local area.</p>
<p>11 Design</p> <p>To promote high quality and sustainable urban design</p> <p>a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</p> <p>b) Ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Encourage the use of sustainable design and construction methods?</p>	+	+	+	+	+	<p>S4 sets clear expectations for the site to create a stronger entrance into the wider area.</p> <p>S5 - It is expected that heights would vary across the site to reflect local context, LVMF, and good design principles. This would help to ensure the characteristics of the existing townscape are adequately considered.</p> <p>S6 requires development to include more active and engaging street elevations, asking that development is set back to accommodate greenery and trees.</p> <p>The allocation of S7 requires development to be carried out in a coordinated way, tools such as masterplanning and design codes are suggested.</p>
<p>12 Historic environment</p> <p>To protect and enhance the historic environment</p> <p>a) Conserve and enhance designated and non-designated heritage assets and their settings and other</p>	0	0	0	+	+	<p>The sites identified in policies S4 – S6 are not situated within a conservation area and do not include any designated heritage assets. However the Parcelforce site (S6) is in close proximity to Regent’s Canal and King’s Cross St Pancras Conservation Areas. A number of properties on Royal College Street and Pratt Street are Grade II listed. The allocation at S6 does not mention how</p>

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
<p>areas of intrinsic and historical value?</p> <p>b) Help ensure new development maintains local character and respects existing high quality townscape?</p> <p>c) Encourage heritage-led regeneration?</p> <p>d) Help provide solutions to those assets on the Heritage at Risk register?</p>						<p>development is expected to respond to the historic setting.</p> <p>St Pancras Hospital (S7) and the Shorebase Access Site (S8) sit within the St. Pancras Gardens sub-area of the King's Cross and St. Pancras conservation area. St Pancras Hospital also includes a number of buildings which are identified as positive contributors in the area's conservation area appraisal. Policy S7 specifically states that key buildings of significant heritage or townscape value should be retained and reused.</p>
<p>13 Efficient use of land</p> <p>To ensure new development makes efficient use of land, buildings and infrastructure</p> <p>a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</p> <p>b) Ensure efficient use of land through maximising densities where appropriate?</p>	+	+	+	+	+	<p>Policies S4 – S8 all ensure that new development makes more efficient use of land by encouraging the reuse, improvement or redevelopment of buildings that are currently underutilised including several low-rise industrial units and depot space.</p>
<p>14 Economic development</p> <p>To encourage and accommodate sustainable economic growth and employment opportunity</p>	+	+	+	+	+	<p>The sites identified in policies S4 – S8 sit within the Knowledge Quarter area.</p> <p>Policies S4 – S8 all state that employment uses should be provided on site. Sites identified in policies S4, S5, and S6 are currently used as light industrial and depot space but are not designated/safeguarded industrial sites. The policy</p>

Sustainability Appraisal objective	120-136 Camley Street, S4 (CSP2)	104 – 114 Camley Street, S5 (CSP3)	Parcelforce and ATS Tyre S6 (CSP4)	St Pancras Hospital S7 (CSP5)	Shorebase Access S8 (CSP6)	Commentary
<p>a) Encourage the retention and growth of existing, locally based industries?</p> <p>b) Accommodate new and expanding businesses?</p> <p>c) Encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Ensure the job density is reduced?</p>						<p>expectation to intensify and increase the amount of employment floorspace alongside the introduction of a substantial number of homes.</p> <p>The provision of homes must not affect the operation of employment and industry and this is reflected in the site allocations for the area.</p> <p>The site covered by policy S7 is currently a hospital although the policy expectation is that while there is a need for there to continue to be an ongoing health use on the site other uses can be introduced including commercial uses, especially those that support the development of the knowledge quarter innovation district.</p> <p>Overall the cumulative impact of these policies on this objective is considered to be positive.</p>
<p>15 To ensure our designated centres remain sustainable and adaptable for the future</p> <p>a) Encourage occupation of units and reduce vacancy rates?</p> <p>b) Consider changing trends and patterns in how people use the designated centres?</p>	+	+	+	+	+	<p>The site allocations in the Camley Street area could help support the long term sustainability of local neighbourhood centres, such as Murray Street and Royal College Street.</p>

Other site allocations in the South area

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p> <p>c) Provide housing for people, particularly families, on moderate and lower incomes?</p> <p>d) Encourage development at an appropriate density, standard, size and mix?</p> <p>e) Provide everybody with the opportunity to live in a better home?</p>	+	+	+	+	+	<p>All site allocations seek to facilitate the delivery of homes.</p> <p>These sites make a positive effect on the housing objective.</p>
<p>2 Healthy communities</p> <p>To promote a healthy community</p>	+	++	0	+	+	<p>The allocation at Eagle Wharf and Bangor Wharf seeks to provide greater access to the canal and active frontages which should increase the attractiveness of the local area for walking.</p>

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
<p>a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles?</p> <p>b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p> <p>e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p>						<p>The allocation of the former Royal National Throat, Nose and Ear hospital will have a positive effect on social exclusion and healthy communities as the policy makes provision for the creation of a new route and public open space through the site which will make it easier for people to interact with the site and walk through the area. The route would also enable people walking along Gray's Inn Road to use a quieter less busy road.</p> <p>The allocation at Belgrove House seeks to ensure that development contributes to improving pedestrian connections, and deliver benefits to the local community through providing genuinely affordable community space.</p> <p>The allocation for Land to the rear of the British Library encourages and opens up new pedestrian routes through the site, promotes a wider mix of uses on the site and increased activity at a ground floor level. These measures should make the area feel more welcoming and safer and encourage people living on and around the site to use more active modes of travel.</p>
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p>	0	++	0	++	+	<p>The Eagle Wharf and Bangor wharf allocation seeks to address existing access and connections to the canal. Improving this would act positively for local residents, and those who visit and work in the local area.</p>

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
<p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p> <p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access</p> <p>d) Encourage development opportunities in those areas in need of economic development?</p>						<p>The allocation of the former Royal National Throat, Nose and Ear hospital will have a positive effect on social exclusion and healthy communities as the policy makes provision for the creation of a new route and public open space through the site which will make it easier for people to interact with the site and walk through the area. The route would also enable people walking along Gray's Inn Road to use a quieter less busy road.</p> <p>The allocation at Belgrove House is expected to deliver significant positive effects by helping to deliver step free access at the underground station, and providing enhanced education and employment opportunities for the local community.</p> <p>The provision for a range of measures at Land to the rear of the British Library should help build social inclusion that provide strong social value from the development including flexible community space/s.</p>
<p>4 Amenity</p> <p>To improve amenity by minimising the impacts associated with development</p> <p>a) Ensure that the amenity of neighbours is not unduly impacted?</p>	-	-	-	-	-	<p>All sites could lead to temporary negative impacts on amenity during construction. Any such impacts will be managed and mitigated through Local Plan Policies on amenity.</p> <p>Allocations which introduce housing in existing employment sites are expected to be designed to minimise any potential conflict.</p>

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
b) Ensure that development and operations will not affect noise sensitive uses?						
5 Open space To conserve and improve open space provision a) Help to protect, increase/improve open space?	0	0	0	+	0	Provision for open space at these sites are limited. Local Plan policy for open space will apply. The allocation at Land to the rear of the British Library should maximise opportunities to provide green infrastructure.
6 Biodiversity To protect and enhance existing habitats and biodiversity and to seek to increase these where possible. a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan? b) Provide for the protection of biodiversity and open space in the borough? c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity?	+	0	0	0	0	The allocation at Eagle Wharf and Bangor Wharf provides clear policy criteria for biodiversity – it is located next to the canal and its impact on biodiversity and opportunities to enhance biodiversity are included.

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
d) Provide for new re-naturalised areas? e) Protect and provide for the protection and planting of more trees in the borough?						
7 Air quality To improve local air quality and limit exposure a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage more trips by walking or cycling?	-	-	-	-	-	Eagle Wharf and Bangor Wharf is in close proximity to an Air Quality Focus Area, and the former Royal National Throat, Nose and Ear hospital, Belgrove House, Former Thameslink Station, and the Land to the rear of the British Library are within an Air Quality Focus Area. Design and layout are important, and air quality assessment should be undertaken early to ensure any negative impact can be mitigated. Policy on air quality in the Local Plan will apply. All sites could lead to temporary negative impacts on air quality during construction. Any such impacts will be managed and mitigated through Local Plan Policies.
8 Energy and resources To promote the efficient use of energy, water and other natural resources, throughout the life of the development a) Encourage energy efficiency through passive design measures?	+	0	0	0	0	Draft Local Plan policies will require development to be net zero carbon and use resources efficiently. The allocation at Eagle and Bangor Wharf seek to utilise existing buildings and materials which responds positively to this objective.

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction?						
9 Water To protect and manage water (including groundwater) a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources)	+	0	0	0	0	Allocations in this area would need to respond to policies in the Local Plan on water protection and flooding. Eagle Wharf and Bangor Wharf is sited next to the Regents Canal. The allocation seeks access points to the canal and identifies it as an opportunity to use the canal for the transportation of goods and materials during construction. Expected improvements to the canalside setting would bring positive benefits.

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
associated with deep piled foundations)						
<p>10 Climate resilience</p> <p>To ensure our buildings and environment can adapt to a changing climate</p> <p>a) Take into account potential flood risk?</p> <p>b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk</p> <p>c) Reduce flood risk?</p> <p>d) Ensure buildings are designed to adapt to warmer summers and increased flood events?</p> <p>e) Provide planting / greening that is more resilient to the changing climate</p>	-	-	-	-	-	<p>EA surface water flood maps identify areas of medium and high risk at Eagle Wharf and Bangor Wharf. It is also an area where a high number of sewer flooding incidents have been reported.</p> <p>The allocation of the former Royal National Throat, Nose and Ear hospital and Land to the rear of the British Library are partly located in a Local Flood Risk Zone. The land to the rear of the British Library is also sited in an area of high surface water flood risk, as shown on EA maps.</p> <p>EA surface water flood maps show a high risk of flooding along Pentonville Road. The Former Thameslink Station is also located in a Local Flood Risk Zone.</p> <p>A Flood Risk Assessment for these sites will need to be carried out in accordance with the Local Plan.</p> <p>The design of buildings and spaces between buildings in this development area should seek to promote natural cooling through appropriate greening, materials, design, and finishes.</p>

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
<p>11 Design</p> <p>To promote high quality and sustainable urban design</p> <p>a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</p> <p>b) Ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Encourage the use of sustainable design and construction methods?</p>	+	+	+	+	+	<p>The allocation at Eagle Wharf and Bangor Wharf seeks to respond positively to local character and its canal setting.</p> <p>The allocation of the former Royal National Throat, Nose and Ear hospital requires a strong understanding of the site and its context which should positively impact existing townscape character.</p> <p>Development at Belgrove House expects an exceptional standard of architecture to respond to its historic setting, providing a visual connection with side streets, and improving its relationship with Argyle Square.</p> <p>The existing building at the Former Thameslink is considered of low architectural merit. The allocation expects development to improve its relationship with the street, providing an active frontage.</p> <p>Development at the land to the rear of the British Library is expected to be of the highest standard of design.</p>
<p>12 Historic environment</p> <p>To protect and enhance the historic environment</p> <p>a) Conserve and enhance designated and non-designated heritage assets and their settings and</p>	+	0	0	+	+	<p>Eagle Wharf and Bangor Wharf are located in Regent Canal Conservation Area and near locally listed and Grade II listed townhouses. The allocation requires development to be of a form and scale which is appropriate to the area and open character of the canal.</p> <p>The allocation of the former Royal National Throat, Nose and Ear hospital is sited within</p>

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
<p>other areas of intrinsic and historical value?</p> <p>b) Help ensure new development maintains local character and respects existing high quality townscape?</p> <p>c) Encourage heritage-led regeneration?</p> <p>d) Help provide solutions to those assets on the Heritage at Risk register?</p>						<p>King's Cross Conservation Area and near Bloomsbury CA and development is required to respond to its context and character.</p> <p>Planning permission has been granted for development of up to 10 storeys on this site. Suitable heights for any subsequent scheme should be determined through a detailed assessment in accordance with Local Plan policy and would need to demonstrate the benefits outweigh heritage harm.</p> <p>Former Thameslink site lies in the King's Cross Conservation Area and is currently occupied by a single storey building of low architectural merit. The site is in between the Grade II, three storey 'Big Chill' late night music venue at 257-259 Pentonville Rd and the Scala, the music venue and snooker hall at the corner of Grays Inn Road and Pentonville Road. The Scala is identified as a positive contributor to the King's Cross Conservation Area and together with the nearby lighthouse building are considered to be local landmarks in the area. Development is expected ensure the design respects the adjacent listed building and the Scala building as a positive contributor to the conservation area.</p>
13 Efficient use of land	+	+	+	+	+	Intensification of sites are promoted through these policies, making more efficient use of land.

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
<p>To ensure new development makes efficient use of land, buildings and infrastructure</p> <p>a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</p> <p>b) Ensure efficient use of land through maximising densities where appropriate?</p>						
<p>14 Economic development</p> <p>To encourage and accommodate sustainable economic growth and employment opportunity</p> <p>a) Encourage the retention and growth of existing, locally based industries?</p> <p>b) Accommodate new and expanding businesses?</p> <p>c) Encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Ensure the job density is reduced?</p>	+	++	+	+	++	<p>These site allocations all seek to provide space to accommodate sustainable economic growth and employment opportunity, making a positive effect on the economic development objective.</p> <p>Eagle Wharf and Bangor Wharf have been and are currently occupied by employment uses. The allocation seeks to utilities the site for housing while maintaining flexible employment space for a range of uses. It does not specify the proportion of employment required. Development of the site should ensure that employment space is sustainable in the long term.</p> <p>The former Royal National Throat, Nose and Ear hospital has since relocated to Huntley Street. The site is allocated for mixed use development of employment and self-contained homes. The continued employment function at</p>

Sustainability Appraisal objective	Eagle Wharf and Bangor Wharf S9 (CSP7b)	Belgrove House, 13 – 21 Euston Road S13 (IDS16)	Former Thameslink, Pentonville Road S14 (IDS17)	Land to the rear of the British Library S16 (IDS19)	Former Royal National Throat, Nose and Ear Hospital S12 (IDS15)	Commentary
						<p>this site should support the growth of Knowledge Quarter uses.</p> <p>The allocation at Belgrove House seeks to provide for the growing knowledge economy in Camden and providing employment opportunity to local residents.</p> <p>Policy S16 allocates the site for a mixed use development that complements and supports the expansion plans and future service needs of the British Library, including cultural, commercial and community uses and in particular uses related to the knowledge and innovation economy.</p>
<p>15 To ensure our designated centres remain sustainable and adaptable for the future</p> <p>a) Encourage occupation of units and reduce vacancy rates?</p> <p>b) Consider changing trends and patterns in how people use the designated centres?</p>	0	+	0	0	+	<p>Optimising site capacity at the former Royal National Throat, Nose and Ear hospital with a mixed use development may help to sustain an undesignated local centre on Gray's Inn and King's Cross Roads.</p>

Other site allocations in the South area

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p> <p>c) Provide housing for people, particularly families, on moderate and lower incomes?</p> <p>d) Encourage development at an appropriate density, standard, size and mix?</p> <p>e) Provide everybody with the opportunity</p>	+	+	+	+	+	0	<p>All site allocations, with the exception of 135-149 Shaftesbury Avenue, seek to facilitate the delivery of homes, some which do not currently provide housing</p> <p>These sites make a positive effect on the housing objective.</p>

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
to live in a better home?							
<p>2 Healthy communities</p> <p>To promote a healthy community</p> <p>a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles?</p> <p>b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p>	+	+	+	0	+	+	<p>The allocations at the Network Building, and Tottenham Mews would contribute to the wider green and open space vision for the local area, this includes improvements to walking and cycling infrastructure.</p> <p>The allocation at Pakenham and Wren Street is expected to provide improvements to pedestrian and cycling infrastructure.</p> <p>Improvements to the public realm through open space, green routes and active overlooked streets should help encourage more walking south of the Euston Road.</p> <p>The retention of 135-149 Shaftesbury Avenue as a cinema/ theatre, and cultural facility is likely to have positive impact for the local community.</p>

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?							
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p> <p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p> <p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that</p>	+	+	0	0	0	+	<p>Wider public realm improvements at the Network Building, and Tottenham Mews would improve open space and green environment in an area which is deficient.</p> <p>135-149 Shaftesbury Avenue uses are likely to be open and accessible to all which will help to facilitate social cohesion and inclusion.</p>

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
would benefit from direct access d) Encourage development opportunities in those areas in need of economic development?							
4 Amenity To improve amenity by minimising the impacts associated with development a) Ensure that the amenity of neighbours is not unduly impacted? b) Ensure that development and operations will not affect noise sensitive uses?	-	-	-	-	-	-	All sites could lead to temporary negative impacts on amenity during construction. Any such impacts will be managed and mitigated through Local Plan Policies on amenity. Allocations which introduce housing in existing employment sites are expected to be designed to minimise any potential conflict.
5 Open space To conserve and improve open space provision	+	+	0	0	+	+	The provision of open space and public realm enhancements are expected at the Network Building, and Tottenham Mews as part of a wider vision for the local area. If these developments are unable to

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a) Help to protect, increase/improve open space?							<p>incorporate on-site open space, a contribution to creating or enhancing publicly accessible open space nearby as per Local Plan policies will apply.</p> <p>Public open space is expected to be delivered at Selkirk House.</p> <p>The allocation at 135-149 Shaftesbury Avenue is expected to work with the local community at Phoenix Gardens.</p>
<p>6 Biodiversity</p> <p>To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.</p> <p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's</p>	0	0	0	0	0	0	<p>Sites south of the Euston Road are limited to eight Local SINC's. The Biodiversity Strategy notes there are areas within Camden where residents lack sufficient access to the natural environment, defined as more than 1km walking distance from a publicly accessible Borough or Metropolitan Site of Importance for Nature Conservation. Local Plan policies on Biodiversity will apply, however there is potential for sites in the south area of Camden to positively impact this objective.</p>

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
Biodiversity Action Plan? b) Provide for the protection of biodiversity and open space in the borough? c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity? d) Provide for new re-naturalised areas? e) Protect and provide for the protection and planting of more trees in the borough?							
7 Air quality To improve local air quality and limit exposure a) Contribute to an improvement of air quality?	-	-	-	-	-	-	The area south of the Euston Road experiences air pollution from its large proportion of commercial buildings, road transport, and construction. The following sites are within an Air Quality Focus Area: Pakenham and

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b) Reduce exposure to harmful emissions? c) Support the actions in the Council’s Clean Air Action Plan? d) Encourage more trips by walking or cycling?							Wren Street; Former Central St Martins; and Selkirk House. All sites could lead to temporary negative impacts on air quality during construction. Any such impacts will be managed and mitigated through Local Plan Policies. Design and layout are important, and air quality assessment should be undertaken early to ensure any negative impact can be mitigated. Policy on air quality in the Local Plan will apply.
8 Energy and resources To promote the efficient use of energy, water and other natural resources, throughout the life of the development a) Encourage energy efficiency through passive design measures?	0						Draft Local Plan policies will require development to be net zero carbon and use resources efficiently.

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction?							
9 Water To protect and manage water (including groundwater) a) Promote the sustainable use of water resources? b) Encourage development that	-	-	-	-	-	-	Allocations in this area would need to respond to policies in the Local Plan on water protection and flooding. The following sites are located above the Secondary A Aquifer: <ul style="list-style-type: none"> • Network Building and Whitfield Street

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
incorporates sustainable drainage? c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)							<ul style="list-style-type: none"> • Former Tottenham Mews Day Hospital • Pakenham and Wren Street • Former Central St Martins • Selkirk House • 135-149 Shaftesbury Avenue For sites where piled foundation works are proposed in a Source Protection Zone or should piled foundations extend through the London Clay to more sensitive aquifers, then a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
10 Climate resilience To ensure our buildings and environment can adapt to a changing climate a) Take into account potential flood risk?	-						The Network Building and Whitfield Street; Former Tottenham Mews Day Hospital; Former Central St Martins, and Selkirk House have potential for groundwater flooding of property situated below ground level.

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b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk c) Reduce flood risk? d) Ensure buildings are designed to adapt to warmer summers and increased flood events? e) Provide planting / greening that is more resilient to the changing climate							<p>EA surface water flood maps also indicate a medium risk of flooding at the northern edge of the Network Building. Tottenham Mews has a medium to high risk from surface water.</p> <p>Packenham and Wren Street, and 135-149 Shaftesbury Avenue is sited in an area with potential for groundwater flooding to occur at the surface. EA surface water flood maps show a medium to high risk of flooding around 135-149 Shaftesbury Avenue.</p> <p>A Flood Risk Assessment will need to be carried out in accordance with the Local Plan.</p> <p>The design of buildings and spaces between buildings in this development area should seek to promote natural cooling through appropriate greening, materials, design, and finishes.</p>
11 Design	+	+	0	+	+	+	The Network Building and Whitfield Street allocation is expected to positively improve the public realm and introduce activity and visual

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<p>To promote high quality and sustainable urban design</p> <p>a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</p> <p>b) Ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Encourage the use of sustainable design and construction methods?</p>							<p>interest to the Whitfield Street frontage, and seek to respond to the rhythm created by the smaller plot sizes and building-widths found in the wider area, including the nearby Conservation Areas.</p> <p>The allocation at Tottenham Mews considers the existing scale of buildings, rhythms, and proportions of the Mews.</p> <p>Central St Martins allocation expects new buildings and extensions are of an exceptional architectural quality to respond to the site's sensitive and varied context.</p> <p>Development at Selkirk House is expected to achieve optimum site capacity taking into consideration the surrounding townscape.</p>
<p>12 Historic environment</p> <p>To protect and enhance the historic environment</p> <p>a) Conserve and enhance designated and non-designated heritage assets and</p>	0	+	+	+	+	+	<p>The historic environment of the Former Tottenham Mews Hospital should be protected and enhanced as the allocation requires development to conserve the character of the conservation area.</p>

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
<p>their settings and other areas of intrinsic and historical value?</p> <p>b) Help ensure new development maintains local character and respects existing high quality townscape?</p> <p>c) Encourage heritage-led regeneration?</p> <p>d) Help provide solutions to those assets on the Heritage at Risk register?</p>							<p>Development at Pakenham and Wren Street is expected to be informed by the historic context of the site.</p> <p>Former Central St Martins has a sensitive historic environment, within a conservation area and the inclusion of Grade II* listed buildings. The site is also within an Archaeological Priority Area – which needs to be flagged in the allocation.</p> <p>The allocation at Selkirk House seeks to ensure that development responds to its sensitive historic environment.</p> <p>The allocation at 135-149 Shaftesbury Avenue will ensure the long term conservation of the Grade II Listed Building – development is required to ensure its fabric and setting are protected and restored.</p>
<p>13 Efficient use of land</p> <p>To ensure new development makes efficient use of land,</p>	+	+	+	+	+	+	<p>Intensification of sites are promoted through these policies, making more efficient use of land.</p>

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
buildings and infrastructure a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?							
14 Economic development To encourage and accommodate sustainable economic growth and employment opportunity a) Encourage the retention and growth of existing, locally based industries? b) Accommodate new and expanding businesses?	+	+	+	+	+	+	All sites are in the Central Activities Zone and wider Knowledge Quarter and provide employment and a proportion of self contained homes. Employment uses specified include offices, knowledge, creative, and other uses such as hotel, retail, and hospitality. These allocations should have cumulative positive impact on accommodating the knowledge economy in Camden, including supporting uses, sustainable growth of the creative industry, and office floorspace. The Network Building did provide a range of small shops with office on

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<p>c) Encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Ensure the job density is reduced?</p>							<p>upper floors. It is expected that development will provide employment uses with a proportion of permanent self contained homes. This will contribute positively to accommodating sustainable economic growth.</p> <p>The allocation at Tottenham Mews provides a balance between employment, or community use, and housing.</p> <p>The allocation at Pakenham and Wren Street seeks to encourage the retention and growth of local employment should this site no longer be required for educational purposes.</p> <p>The allocation at Former Central St Martins, recognises the existing planning permission for a hotel and self-contained homes, but includes provision for a range of employment uses, hotel, and self-contained homes.</p>

Sustainability Appraisal objective	Network Building and Whitfield Street S10 (IDS1)	Former Tottenham Mews Day Hospital S11 (IDS2)	Land bounded by Pakenham Street and Wren Street S15 (IDS18)	Former Central St Martins College S17 (HCG2)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street S18 (HCG3)	135 – 149 Shaftesbury Avenue S19 (HCG4)	Commentary
							Selkirk House would retain its employment / hotel function with the provision of self contained homes.
<p>15 To ensure our designated centres remain sustainable and adaptable for the future</p> <p>a) Encourage occupation of units and reduce vacancy rates?</p> <p>b) Consider changing trends and patterns in how people use the designated centres?</p>	+	+	+	+	+	+	The allocations should contribute positively to ensuring Camden's designated centres remain sustainable by optimising site capacity, introducing self-contained homes and contributing positively to the public realm in close proximity to central London frontages and neighbourhood centres.

List sites in the South area

The following sites are further site allocation policies (list sites) in the south area of the borough, many of which are already subject to planning permission. These site allocations do not set detailed policy, their intention is to specify safeguarded uses which have generally been agreed through previous allocation or an existing planning permission, as such their appraisal is limited.

Site reference/ name	Sustainability Appraisal objectives															Summary of SA commentary
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
Agar Grove Estate S20 (CSP7a)	+	0	0	-	0	0	0	0	0	0	0	0	+	0	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction (earlier phases completed).
St Pancras Commercial centre S21 (CSP7c)	+	0	0	-	0	0	0	0	0	0	0	0	+	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction.
6 St Pancras Way S22 (CSP7d)	+	0	0	-	0	0	0	0	0	0	0	0	+	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction.
Tybalds estate (infill) S23 (HGC5a)	+	0	0	-	0	0	0	0	0	0	0	0	0	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction.
294-295 High Holborn S24 (HCG5b)	+	0	0	-	0	0	0	0	0	0	0	0	+	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Initial works commenced.

156 – 164 Gray's Inn Road S25 (HCG5c)	+	0	0	-	0	0	0	0	0	0	0	0	0	+	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction.
8-10 Southampton Row S26 (HCG5e)	+	0	0	-	0	0	0	0	0	0	0	0	0	+	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission.
60-67 Shorts Garden and 14-16 Betterton Street S27 (HCG5f)	+	0	0	-	0	0	0	0	0	0	0	0	0	+	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction.
Cockpit Yard and Holborn Library, 32-38 Theobalds Road S28 (HCG5h)	+	0	0	-	0	0	0	0	0	0	0	0	0	+	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. This site is being taken forward by the Council's Community Investment Team. The site is allocated for employment, permanent self-contained homes, library. A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been estimated at 110 additional homes but should relate to the scale of all additional floor area (GIA) proposed.
18 Vine Hill and 15-29 Eyre Street Hill S29 (HCG5j)	+	0	0	-	0	0	0	0	0	0	0	0	0	+	+	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction.
Middlesex Hospital Annex S30 (IDS20a)	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction.

Central Somers Town S31 (IDS20x)	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission. Site is under construction (earlier phases completed).
Chalton Street, Godwin and Crowndale estate S32 (NEW)	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	This policy only sets out information on the proposed use of a site and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission.
Birkbeck College, Malet Street S33 (BC2a)	-	0	0	0	0	0	0	0	0	0	0	0	0	+	+	These sites are allocated for higher education (academic and ancillary space). With regards to the inclusion of self-contained homes they are not required as part of development for the University of London or its member institutions provided the development is publicly-funded or serves a public purpose. The policy for the area also provides for student housing where it will not compromise the need for additional academic space.
Senate House (NE quadrant), Malet Street S34 (BC2b)	-	0	0	0	0	0	0	0	0	0	0	0	0	+	+	
20 Russell Square S35 (BC2c)	-	0	0	0	0	0	0	0	0	0	0	0	0	+	+	

West area site allocation policies

The site allocations in the west area are focussed around West Hampstead and the Finchley Road, with other sites also allocated outside of these areas. These sites are appraised below.

Site allocations in the West Hampstead area

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p> <p>c) Provide housing for people, particularly families, on moderate and lower incomes?</p> <p>d) Encourage development at an appropriate density, standard, size and mix?</p> <p>e) Provide everybody with the opportunity to live in a better home?</p>	++	+	+	+	<p>All site allocations, seek to facilitate the delivery of homes, some which do not currently provide housing</p> <p>The O2 Centre facilitates the delivery of approximately 1800 permanent self-contained homes on a site that currently does not provide any housing and so will make a significant contribution to the Borough's housing supply.</p> <p>These sites make a positive effect on the housing objective.</p>
<p>2 Healthy communities</p> <p>To promote a healthy community</p> <p>a) Improve the health of the Borough's population by increasing</p>	++	+	+	0	<p>The allocations in the West Hampstead Area would cumulatively contribute to the wider public realm improvements and increase accessibility for the local area, this includes</p>

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
<p>the opportunity for healthy pursuits and promote healthy lifestyles?</p> <p>b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p> <p>e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p>					<p>improvements to walking and cycling infrastructure.</p> <p>The allocation at the O2 Centre is expected to provide significant public benefits which contribute positively to this objective – public toilets, open space, leisure facilities.</p>
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p> <p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p> <p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and</p>	++	+	+	0	<p>The allocation at O2 Centre is expected to deliver increased permeability, ease of access and wider public open space which should have a positive impact on social inclusion in the local area. Employment floorspace suitable for small and medium businesses is expected and provision of affordable workspace.</p> <p>The allocation at 11 and 13 Blackburn Road will contribute towards greater employment opportunity in the local area through the provision of affordable workspace for small and medium businesses. Improvements to access along Billy Fury Way would contribute positively to both social exclusion and healthy</p>

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
communities that would benefit from direct access d) Encourage development opportunities in those areas in need of economic development?					communities objectives, in establishing a safer, more accessible walking route.
4 Amenity To improve amenity by minimising the impacts associated with development a) Ensure that the amenity of neighbours is not unduly impacted? b) Ensure that development and operations will not affect noise sensitive uses?	-	-	-	-	All sites could lead to temporary negative impacts on amenity during construction. Any such impacts will be managed and mitigated through Local Plan Policies on amenity. Allocations which introduce housing in existing employment sites are expected to be designed to minimise any potential conflict.
5 Open space To conserve and improve open space provision a) Help to protect, increase/improve open space?	++	0	0	0	The provision of open space and public realm enhancements are expected at the O2 Centre, with the policy stating that development should include new and improved public realm and public open spaces that are fully accessible to the community, workers and visitors to the area. These should be of different forms, and functions, related to the location, and the uses and activities, they serve.
6 Biodiversity To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	+	0	0	+	The O2 Centre allocation highlights an opportunity to improve and enhance biodiversity and ecological connectivity. 188 – 190 Iverson Road is located next to a Grade I SINC. The site policy identifies this sensitivity to ensure the SINC is protected. This

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
<p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan?</p> <p>b) Provide for the protection of biodiversity and open space in the borough?</p> <p>c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity?</p> <p>d) Provide for new re-naturalised areas?</p> <p>e) Protect and provide for the protection and planting of more trees in the borough?</p>					could be improved by requiring development to enhance biodiversity on the border of the site.
<p>7 Air quality</p> <p>To improve local air quality and limit exposure</p> <p>a) Contribute to an improvement of air quality?</p> <p>b) Reduce exposure to harmful emissions?</p> <p>c) Support the actions in the Council's Clean Air Action Plan?</p> <p>d) Encourage more trips by walking or cycling?</p>	-	-	-	-	<p>The O2 Centre is partly within an Air Quality Focus Area.</p> <p>All sites could lead to temporary negative impacts on air quality during construction. Any such impacts will be managed and mitigated through Local Plan Policies.</p> <p>Design and layout are important, and air quality assessment should be undertaken early to ensure any negative impact can be mitigated. Policy on air quality in the Local Plan will apply.</p>

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
<p>8 Energy and resources</p> <p>To promote the efficient use of energy, water and other natural resources, throughout the life of the development</p> <p>a) Encourage energy efficiency through passive design measures?</p> <p>b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere?</p> <p>c) Encourage the re-use of resources?</p> <p>d) Ensure reduction of waste during the development process and/or operation?</p> <p>e) Encourage a more efficient supply of resources?</p> <p>f) Encourage sustainable design and construction?</p>	0	+	0	0	<p>Draft Local Plan policies will require development to be net zero carbon and use resources efficiently.</p> <p>Retention of the Victorian warehouse at 11 Blackburn Road will contribute positively to resource efficiency and heritage objectives.</p>
<p>9 Water</p> <p>To protect and manage water (including groundwater)</p> <p>a) Promote the sustainable use of water resources?</p> <p>b) Encourage development that incorporates sustainable drainage?</p>	0	0	0	0	<p>No risk identified, development should respond to Local Plan Policy on the protection and management of water.</p>

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)					
10 Climate resilience To ensure our buildings and environment can adapt to a changing climate a) Take into account potential flood risk? b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk c) Reduce flood risk? d) Ensure buildings are designed to adapt to warmer summers and increased flood events? e) Provide planting / greening that is more resilient to the changing climate	-	0	0	0	The O2 Centre site allocation is over a hectare, part of the site is within a Local Flood Risk Zone, and Finchley Road has experienced surface water flooding. Environment Agency surface flood water maps show areas of medium and high surface water flood risk. A Flood Risk Assessment will need to be carried out in accordance with the Local Plan. The design of buildings and spaces between buildings in this development area should seek to promote natural cooling through appropriate greening, materials, design, and finishes.
11 Design To promote high quality and sustainable urban design	+	+	+	0	The O2 Centre allocation expects high quality design that respects its context and specifically seeks to ensure a coherent design. It also expects development to create a high quality

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Ensure enhancement of the public realm and local distinctiveness? c) Encourage the use of sustainable design and construction methods?					public realm. The overall impact of the policy on this objective is considered to be positive. Site policies 11 and 13 Blackburn Road expect improvements to address safety and access at Billy Fury Way – a walkway behind the sites.
12 Historic environment To protect and enhance the historic environment a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value? b) Help ensure new development maintains local character and respects existing high quality townscape? c) Encourage heritage-led regeneration? d) Help provide solutions to those assets on the Heritage at Risk register?	0	+	0	0	The retention of the Victorian warehouse at 11 Blackburn Road positively contributes to protecting the local historic character.
13 Efficient use of land	++	+	+	+	Intensification of sites are promoted through these policies, making more efficient use of land.

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
<p>To ensure new development makes efficient use of land, buildings and infrastructure</p> <p>a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</p> <p>b) Ensure efficient use of land through maximising densities where appropriate?</p>					
<p>14 Economic development</p> <p>To encourage and accommodate sustainable economic growth and employment opportunity</p> <p>a) Encourage the retention and growth of existing, locally based industries?</p> <p>b) Accommodate new and expanding businesses?</p> <p>c) Encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Ensure the job density is reduced?</p>	+	+	+	+	<p>All site allocation policies within the West Hampstead area provide for employment uses – the area is accessible and well served by public transport with existing employment functions. The allocations will continue to encourage economic growth and employment opportunity.</p> <p>The O2 site is likely to accommodate a wider range of employment opportunities, sited within Finchley Road Town Centre.</p> <p>11 and 13 Blackburn Road requires provision for small and medium sized businesses and affordable workspace which should help to accommodate new and expanding businesses.</p> <p>The retention of office and light industrial uses at Iverson Road reflects the character of existing and locally based employment in the area.</p>

Sustainability Appraisal objective	O2 Centre and car park, car showrooms, 14 Blackburn Road W2 (WHI2)	11 Blackburn Road W3 (new)	13 Blackburn Road W4 (WHI3)	188 – 190 Iverson Road W5 (WHI4)	Commentary
<p>15 To ensure our designated centres remain sustainable and adaptable for the future</p> <p>a) Encourage occupation of units and reduce vacancy rates?</p> <p>b) Consider changing trends and patterns in how people use the designated centres?</p>	+	+	+	+	The allocations should contribute positively in ensuring Camden's designated centres remain sustainable by optimising site capacity, introducing self-contained homes and contributing positively to the public realm.

Other site allocations in the West area

Sustainability Appraisal objective	Meridian House W6 (IDS9)	Gondar Gardens W7 (IDS10)	Commentary
<p>1 Housing</p> <p>To promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>a) Provide adequate housing completions to meet local needs</p> <p>b) Protect and promote affordable housing development</p> <p>c) Provide housing for people, particularly families, on moderate and lower incomes?</p> <p>d) Encourage development at an appropriate density, standard, size and mix?</p> <p>e) Provide everybody with the opportunity to live in a better home?</p>	+	+	<p>The Meridian House allocation provides for a mixed use development consisting of employment uses (light industrial and offices) and permanent self-contained homes. The policy seeks to make more efficient use of the site and will ensure that the operation of existing or future employment uses on the site are not compromised by the inclusion of additional homes.</p> <p>The allocation at Gondar Gardens is housing led, no employment uses have been specified.</p> <p>These sites make a positive effect on the housing objective.</p>

Sustainability Appraisal objective	Meridian House W6 (IDS9)	Gondar Gardens W7 (IDS10)	Commentary
<p>2 Healthy communities</p> <p>To promote a healthy community</p> <p>a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles?</p> <p>b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p> <p>e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p>	0	0	The effect of both allocations on this objective is neutral.
<p>3 Social exclusion</p> <p>To tackle poverty and social exclusion and promote equal opportunities</p> <p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services?</p> <p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access</p> <p>d) Encourage development opportunities in those areas in need of economic development?</p>	0	0	The effect of both allocations on this objective is neutral.

Sustainability Appraisal objective	Meridian House W6 (IDS9)	Gondar Gardens W7 (IDS10)	Commentary
<p>4 Amenity</p> <p>To improve amenity by minimising the impacts associated with development</p> <p>a) Ensure that the amenity of neighbours is not unduly impacted?</p> <p>b) Ensure that development and operations will not affect noise sensitive uses?</p>	-	-	<p>All sites could lead to temporary negative impacts on amenity during construction. Any such impacts will be managed and mitigated through Local Plan Policies on amenity.</p> <p>Allocations which introduce housing in existing employment sites are expected to be designed to minimise any potential conflict.</p>
<p>5 Open space</p> <p>To conserve and improve open space provision</p> <p>a) Help to protect, increase/improve open space?</p>	0	0	<p>The effect of both allocations on this objective is neutral.</p>
<p>6 Biodiversity</p> <p>To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.</p> <p>a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan?</p> <p>b) Provide for the protection of biodiversity and open space in the borough?</p> <p>c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity?</p> <p>d) Provide for new re-naturalised areas?</p> <p>e) Protect and provide for the protection and planting of more trees in the borough?</p>	+	+	<p>There is no designation for biodiversity on or near the allocation at Meridian House however development at the site has potential to impact the wooded corpse – the allocation seeks to ensure its protection and enhancement. This intervention should contribute positively in protecting local habitats.</p> <p>The site area covered by Gondar Gardens includes a Grade 2 SIN. The allocation provides clear parameters requiring development to focus on the un-designated parts of the site, ensuring no decline in habitat and providing a net gain in biodiversity.</p>
<p>7 Air quality</p> <p>To improve local air quality and limit exposure</p> <p>a) Contribute to an improvement of air quality?</p>	-	-	<p>Meridian House is within an Air Quality Focus Area.</p> <p>Both sites could lead to temporary negative impacts on air quality during construction. Any such impacts will be managed and mitigated through Local Plan Policies.</p>

Sustainability Appraisal objective	Meridian House W6 (IDS9)	Gondar Gardens W7 (IDS10)	Commentary
b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage more trips by walking or cycling?			Design and layout are important, and air quality assessment should be undertaken early to ensure any negative impact can be mitigated. Policy on air quality in the Local Plan will apply.
8 Energy and resources To promote the efficient use of energy, water and other natural resources, throughout the life of the development a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction?	0	0	Draft Local Plan policies will require development to be net zero carbon and use resources efficiently.
9 Water To protect and manage water (including groundwater) a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations)	0	0	No risk identified, development should respond to Local Plan Policy on the protection and management of water.

Sustainability Appraisal objective	Meridian House W6 (IDS9)	Gondar Gardens W7 (IDS10)	Commentary
<p>10 Climate resilience</p> <p>To ensure our buildings and environment can adapt to a changing climate</p> <p>a) Take into account potential flood risk?</p> <p>b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk</p> <p>c) Reduce flood risk?</p> <p>d) Ensure buildings are designed to adapt to warmer summers and increased flood events?</p> <p>e) Provide planting / greening that is more resilient to the changing climate</p>	-	0	<p>Meridian House is located on a previously flooded street.</p> <p>A Flood Risk Assessment will need to be carried out in accordance with the Local Plan.</p> <p>The design of buildings and spaces between buildings in this development area should seek to promote natural cooling through appropriate greening, materials, design, and finishes.</p>
<p>11 Design</p> <p>To promote high quality and sustainable urban design</p> <p>a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</p> <p>b) Ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Encourage the use of sustainable design and construction methods?</p>	0	+	<p>The site at Gondar Gardens is currently undeveloped. The allocation seeks to ensure that development protects views across the site. Further guidance is set out in the policies in the draft Local Plan.</p>
<p>12 Historic environment</p> <p>To protect and enhance the historic environment</p> <p>a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?</p> <p>b) Help ensure new development maintains local character and respects existing high quality townscape?</p>	0	0	<p>Meridian House is located next to a locally listed terrace on Finchley Road. The allocation does not include requirements for design and heritage. Policies in the Local Plan will apply.</p>

Sustainability Appraisal objective	Meridian House W6 (IDS9)	Gondar Gardens W7 (IDS10)	Commentary
c) Encourage heritage-led regeneration? d) Help provide solutions to those assets on the Heritage at Risk register?			
13 Efficient use of land To ensure new development makes efficient use of land, buildings and infrastructure a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?	+	+	Intensification of sites are promoted through these policies, making more efficient use of land.
14 Economic development To encourage and accommodate sustainable economic growth and employment opportunity a) Encourage the retention and growth of existing, locally based industries? b) Accommodate new and expanding businesses? c) Encourage new investment in the local economy and promote development opportunities for employment? d) Ensure the job density is reduced?	+	0	The allocation at Meridian House seeks to ensure that the addition of housing would not compromise the existing employment function. The allocation seeks to secure the employment function is retained at this site providing for small to medium sized businesses.
15 To ensure our designated centres remain sustainable and adaptable for the future a) Encourage occupation of units and reduce vacancy rates? b) Consider changing trends and patterns in how people use the designated centres?	0	0	The allocations will have a neutral effect on this SA objective.

List sites in the West area

The following sites are further site allocation policies (list sites) in the west area of the borough, many of which are already subject to planning permission. These site allocations do not set detailed policy, their intention is to specify safeguarded uses which have generally been agreed through previous allocation or an existing planning permission, as such their appraisal is limited.

Site reference/ name	Sustainability Appraisal objectives															Summary of SA commentary
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
Land at Midland Crescent W8 (WHI5a)	+	0	0	-	0	0	0	0	0	0	0	0	0	0	+	Provision of homes and or student accommodation should have a minor positive effect on the SA Housing objective. Suitable Town Centre uses at the ground floor should help to support the vitality of Finchley Road and Swiss Cottage Town Centre.
BP Petrol Station, 104A Finchley Road W9 (IDS20h)	+	0	0	-	0	0	0	0	0	0	0	0	0	+	0	<p>The BP Petrol filling station is located next to Finchley Road Town Centre and is surrounded by a mix of retail and residential uses. The list site policy only sets out information on the proposed use of a site and the indicative capacity of the site. This policy promotes residential development on a site that currently has no residential use, as such it will have a minor positive effect on housing objectives.</p> <p>The site is in an area at risk of flooding, as defined by Local Plan Policy CC3 Water and Flooding. The site should take account of potential flood risk in accordance with Local Plan Policy CC3.</p> <p>The only perceived negative effect is on objective 4 as the development site is in a predominantly residential area as such there is likely to be a negative impact on amenity during the construction phase. However, any such impacts will be managed and mitigated through Local Plan Policy.</p> <p>Overall the policy is considered to have a neutral effect in terms of the set objectives.</p>
Abbey Co-Op Housing Site, Casterbridge	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	The Abbey Co-op list site policy only sets out information on the proposed use and the indicative capacity of the site. The information set out in this policy mirrors an existing planning permission.

and Snowman House W10 (IDS20q)																<p>The site is in an area at risk of flooding, as defined by Local Plan Policy.</p> <p>Overall the policy is considered to have a neutral effect in terms of the set objectives.</p>
100 Avenue Road W11 (IDS20v)	+	0	0	-	0	0	-	0	0	0	0	0	0	0	0	<p>The information set out in this policy mirrors an existing planning permission.</p> <p>The site is in an area at risk of flooding, as defined by Local Plan Policy CC3 Water and Flooding. The site should take account of potential flood risk in accordance with Local Plan Policy.</p> <p>This site is in an Air Quality Focus Area. Further attention needs to be made to ensure that development impacts are appropriately mitigated.</p> <p>Overall the policy is considered to have a neutral effect in terms of the set objectives.</p>
Former Liddell Road Industrial Estate W12 (IDS20z)	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	<p>Provision of homes should have a minor positive effect on the SA Housing objective. Employment uses should help to support the economic development objective.</p> <p>The information set out in this policy mirrors an existing planning permission.</p>
551-557 Finchley Road W14 (new)	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>The information set out in this policy mirrors an existing planning permission.</p> <p>Provision of homes should have a minor positive effect on the SA Housing objective.</p>
317 Finchley Road W14 (new)	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>The information set out in this policy mirrors an existing planning permission.</p> <p>Provision of homes should have a minor positive effect on the SA Housing objective.</p>

Sites considered but not allocated

Sites considered and excluded as part of the preparation of the draft Site Allocations Local Plan 2020 (Regulation 18 version) are listed below.

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
Cambridge House 373 - 375 Euston Road London NW1 3AR	Identified in the Fitzrovia AAP, London SHLAA, Major site	Limited development potential
Saatchi Block	Identified in the Fitzrovia AAP and London SHLAA,	Under construction/ advanced construction stage
Queens Square House 22 Queen Square	Major site	Unlikely to become available
27 Gordon Square and 15 Gordon Street	Current Site Allocation	Recently developed
20-22 Gordon Street / Wates House	Current Site Allocation	Recently developed
61 - 63 Tottenham Court Road & 1-7 and 11-13 Goodge Street	Identified in the Fitzrovia AAP	Recently developed
Astor College, 99 Charlotte Street	Identified in the Fitzrovia AAP	Under construction/ advanced construction stage
Royal Ear Hospital and Medical Students union Huntley Street	Identified in the Fitzrovia AAP	Under construction/ advanced construction stage
Rosenheim Building Grafton Way	Identified in the Fitzrovia AAP	Under construction/ advanced construction stage
Odeon Site Grafton Way	Identified in the Fitzrovia AAP	Under construction/ advanced construction stage
CIP - Maiden Lane Estate	London SHLAA	Recently developed
79 Camden Road	London SHLAA	Recently developed
196-206 Camden Road NW1 9HG	London SHLAA	Unlikely to become available
Hammond street depot	CIP, Nominated by a Council officer	Limited development potential
r/o 142 Camden Road	Nominated by a Council officer	Limited development potential
Centric Close, Oval Road	London SHLAA and Major site	Under construction/ advanced construction stage
Utopia Village, 7 Chalcot Road	London SHLAA	Substantive policy/environmental constraint
Hawley Wharf Chalk Farm Road NW1 8QU	London SHLAA	Under construction/ advanced construction stage
44 - 44a Gloucester Avenue and R/O 46-50 Gloucester Avenue	London SHLAA and Major site	Under construction/ advanced construction stage
57-71 Pratt Street, 10-15 Georgiana Street and Royal College Street	Current Site Allocation and London SHLAA	Unlikely to become available
Primrose hill workshops, Oppidans Road	Nominated by a Council officer	Unlikely to become available
Camden Road Juniper Crescent	Major site	Duplicate site – see Policy CGY06 (Now Policy C11)
King's College London Kidderpore Avenue Hampstead Residence	London SHLAA	Under construction/ advanced construction stage
Holy Trinity Church Finchley Road	Major site	Limited development potential

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
252 Finchley Road	Major site	Under construction/ advanced construction stage
328-338 Finchley Road	London SHLAA	Under construction/ advanced construction stage
Heath Park Gardens, Templewood Avenue	London SHLAA	Unlikely to become available
Meridian House, 202 Finchley Road	Identified in a Neighbourhood Plan	Duplicate site see Policy IDS9 (Now Policy W6)
Conrad Court, 27 Redington Gardens	Identified in a Neighbourhood Plan	Limited development potential
1 Platt's Lane	Identified in a Neighbourhood Plan	Limited development potential
Garages (8) on south side of Frogna Lane	Identified in a Neighbourhood Plan	Limited development potential
Garages to R/O 27A Frogna	Identified in a Neighbourhood Plan	Limited development potential
Hampstead Gate, 1A Frogna NW3 6AL (offices)	Identified in a Neighbourhood Plan	Unlikely to become available
R/O 166-200A Finchley Road, adjacent to Hampstead Gate	Identified in a Neighbourhood Plan	Limited development potential
282-284 Finchley Road	Identified in a Neighbourhood Plan and Major site	Limited development potential
Garages adjacent to 30 Redington Road	Identified in a Neighbourhood Plan	Limited development potential
Kidderpore Hall	Identified in a Neighbourhood Plan	Limited development potential
24,25, 26 Redington Gardens	Identified in a Neighbourhood Plan	Limited development potential
65 and 67 Maygrove Rd	London SHLAA and Major site	Recently developed
23 Ravenshaw Street	Nominated by a Council officer	Limited development potential
West Hampstead Police Station, 21 Fortune Green Road	Identified in a Neighbourhood Plan	Unlikely to become available
Fortune Green Play centre, Fortune Green Road	Identified in a Neighbourhood Plan	Substantive policy/environmental constraint
32 Lawn Road, NW3 2XU	London SHLAA	Under construction/ advanced construction stage
Land at Kiln Place (Blocks 1-64 65-80 81-96 97-104 105-116 1 Kiln Place	London SHLAA	Under construction/ advanced construction stage
Land adjacent to the Murphy's site (Network Rail)	Nominated in the 2018 Call for Sites	Duplicate site within Policy KT3 (now Policy C3)
21-31 New Oxford Street	Current Site Allocation	Under construction/ advanced construction stage
St Giles Circus/Consolidated	Current Site Allocation	Recently developed
Mount Pleasant, Phoenix Place	Current Site Allocation and Major site	Under construction/ advanced construction stage
150 High Holborn London EC1N 2NS	London SHLAA and Major site	Under construction/ advanced construction stage
35 - 41 New Oxford Street, 10-12 Museum Street, 16A-18 West Central Street	Major site	Under construction/ advanced construction stage
Italian Hospital, GOSH	Major site	Limited development potential
Templar House	Major site	Recently developed
12-14 Greville Street	Major site	Limited development potential

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
Ambassadors Theatre, West Street	Major site	Limited development potential
17 Charterhouse Street	Major site	Under construction/ advanced construction stage
4 Wild Court & 75 King'sway	Major site	Under construction/ advanced construction stage
19-20 Procter Street	Major site	Unlikely to become available
Centre Point Tower (Scheme A)	London SHLAA	Recently developed
Bourne Estate (south) Portpool Lane	London SHLAA	Recently developed
Triangle Estate, High Holborn	Major site	Limited development potential
Thomas Neal Centre, Neal Street	Major site	Limited development potential
Herbal House	Current Site Allocation	Recently developed
124 Theobalds Road	Major site	Limited development potential
Athlone House Hampstead Lane	London SHLAA and Major site	Under construction/ advanced construction stage
57-84 & 85-112 Makepeace Mansions	London SHLAA	Recently developed
Swains Lane Retail Parade	Identified in a Neighbourhood Plan and major site	Under construction/ advanced construction stage
ASF garage, Highgate Road	Identified in a Neighbourhood Plan	Limited development potential
Harmood Street and r/o 34 Chalk Farm Road	Current Site Allocation	Recently developed
Bartrams Convent Hostel	London SHLAA	Under construction/ advanced construction stage
Former Hampstead Police Station 26 Rosslyn Hill	Nominated in the 2018 Call for Sites and Major site	Limited development potential
6 Streatley Place	Nominated by a Council officer	Limited development potential
29 New End	Current Site Allocation	Under construction/ advanced construction stage
254 Kilburn High Road	Major site	Under construction/ advanced construction stage
154 Loudoun Road NW8 0DQ	Nominated in the 2018 Call for Sites and London SHLAA	Recently developed
Belsize priory health centre, 208 Belsize Road	Nominated in the 2018 Call for Sites	Duplicate site; within Policy IDS20q (now Policy W10)
Mazenod Avenue	Nominated by a Council officer	Limited development potential
Greenwood Place, 19-37 Highgate Road	Current Site Allocation and Major site	Unlikely to become available
Former BR staff association club, college lane London nw5 1bj	London SHLAA and Major site	Under construction/ advanced construction stage
Spire BMW, 1 Brown's Lane	London SHLAA	Duplicate site – see Policy KT02 (Now Policy C2)
Frideswide Place, Kentish Town Library	Identified in a Neighbourhood Plan	Unlikely to become available
Wolsey Mews	Identified in a Neighbourhood Plan	Unlikely to become available
2 Prince of Wales Road	Identified in a Neighbourhood Plan	Unlikely to become available
Veolia Council depot site, 78 Holmes Road	Identified in a Neighbourhood Plan	Under construction/ advanced construction stage

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
Adjacent to 42 Falkland Road	Nominated by a Council officer	Limited development potential
King's Cross Methodist Church, 58a Birkenhead Street	Major site	Limited development potential
Stratstone, 277A Gray's Inn Road	Current Site Allocation and Major site	Recently developed
49 Mecklenburgh Square	Major site	Limited development potential
Former King's Cross Thamelink Station, Pentonville Road	Major site	Duplicate site – see Policy IDS17 (now S17)
Stephenson House, 75 Hampstead Road	Identified in Euston Area Plan and Major site	Within Euston Area Plan area
Koko 1A Camden High Street, Hope & Anchor PH	Major site	Under construction/ advanced construction stage
Three Fields - Brierfield, Fairfield and Foxfield	Major site	Unlikely to become available
Diorama, 17, 18 and 19 Park Square East	Major site	Limited development potential
Regent's Park Barracks, Albany Street, Ministry of Defence	London SHLAA	Unlikely to become available
Maria Fidelis School, North Gower Street	Identified in Euston Area Plan	Within Euston Area Plan area
Clarkson Row	Identified in Euston Area Plan	Within Euston Area Plan area
Harrington Square	Identified in Euston Area Plan	Within Euston Area Plan area
Ye Olde Swiss Cottage, ODEON Cinema	London SHLAA and Major site	Unlikely to become available
40 -49 Edmund Terrace	Current Site Allocation	Recently developed
Belle Isle Frontage Site, York Way, N1 0AD	Nominated in the 2018 Call for Sites	Wholly or mostly outside the borough boundary
102 Camley Street	Major site	Recently developed
101 Camley Street	London SHLAA and Major site	Under construction/ advanced construction stage
The Triangle Site 180 York Way London N1C 0AZ	Major site	Wholly or mostly outside the borough boundary
Maria Fidelis School 34 Phoenix Road and 1-39 Drummond Crescent London NW1 1TA	Identified in Euston Area Plan , London SHLAA and Major site	Recently developed
53-55 Chalton Street & 70 Churchway	Identified in Euston Area Plan and Major site	Within Euston Area Plan area
Building T1, Kings Cross Central	London SHLAA	Recently developed
24 Crowndale Road	Major site	Unlikely to become available
Kings Cross Station Throat	Nominated in the 2018 Call for Sites	Unlikely to become available
Rear of 148-152 West End Lane	London SHLAA and Major site	Limited development potential
187-199 West End Lane	London SHLAA	Recently developed
English National Opera, 165 Broadhurst Gardens	Identified in a Neighbourhood Plan	Unlikely to become available
West Hampstead fire station, West End lane	Identified in a Neighbourhood Plan	Unlikely to become available

Sites considered and excluded as part of the preparation of the draft new Local Plan 2024 (Regulation 18 version) are listed below.

Site name	Site identification source	Reason why the site was not included in the draft new Local Plan
Tavistock centre 120 Belsize Lane and 8 Fitzjohn Avenue	Nominated in the 2020 Call for sites	Proposed scheme no longer going ahead, meaning site is not currently available.
1 Eversholt Street (Kings Cross Signal Box)	Nominated in the 2020 Call for sites	Insufficient information provided to assess the suitability, availability and deliverability of the site at this stage
Kentish Town Station	Nominated in the 2020 Call for sites	Insufficient information provided to assess the suitability, availability and deliverability of the site at this stage
Ramsey Hall	Nominated in the Call for sites 2022	Potential policy conflict and insufficient information provided to fully assess the site at this stage
118 - 124 Charing Cross Road	Nominated in the Call for sites 2022	Potential policy conflict as no residential proposed
Priory Tavern 250 Belsize Road	Nominated in the Call for sites 2022	Potential policy conflict as no residential proposed / under the residential threshold
160 Malden Road	Nominated in the Call for sites 2022	Expected residential capacity under the threshold
St Dominic Primary School Southampton Road Camden	Nominated in the Call for sites 2022	Potential policy conflict as no residential proposed / no change of use proposed – site to remain as a school
West Hampstead Tube station	Nominated in the Call for sites 2022	Insufficient information provided to assess the suitability, availability and deliverability of the site at this stage