

**Sustainability Appraisal of the Camden
Local Plan Proposed Submission Draft
April 2025**

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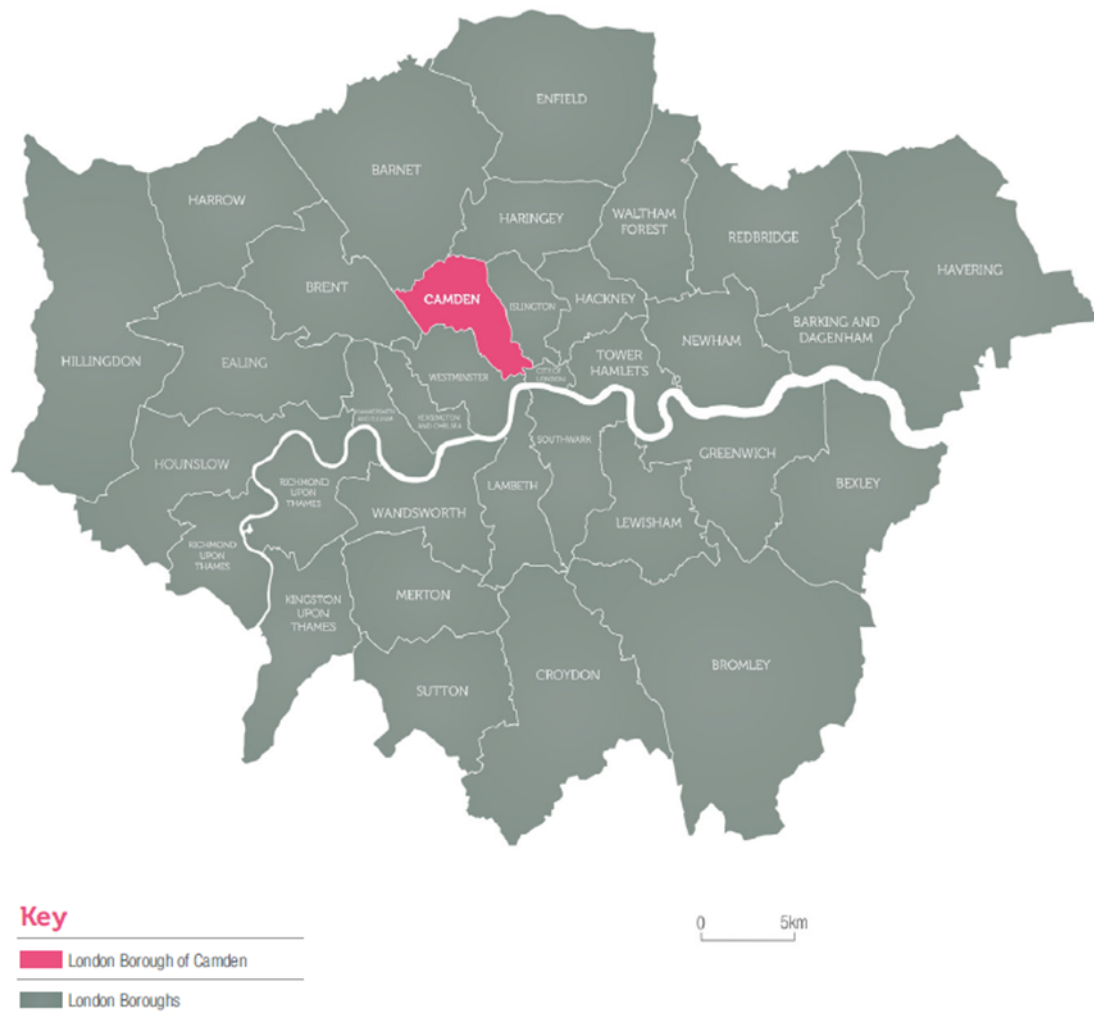
Chapter 1 - Introduction

- 1.1 The London Borough Camden has prepared a Sustainability Appraisal (SA) of the Camden Local Plan Proposed Submission Draft. Once adopted, the Local Plan will set the strategy for future development in the borough to 2041, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.2 This report relates to the Regulation 19 Camden Local Plan Proposed Submission Draft and should be read in conjunction with that document.
- 1.3 An 'interim' SA Report was prepared by AECOM for consultation alongside the Draft New Camden Local Plan Regulation 18 version in January 2024.

1.1 London Borough Camden

- 1.4 The London Borough Camden is situated in central London and is bordered by the City of London, Westminster, Islington, Haringey, Barnet and Brent. Camden covers almost 22 square kilometres, comprising 1.4% of the Greater London area, making it one of the smallest boroughs in London. Despite this, Camden has the 9th highest population density in London and is home to some 218,000 people, according to the ONS mid-year estimates in 2022.
- 1.5 Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. Camden's population is also ethnically diverse, with the 2021 Census showing that 40.5% of Camden's residents were from Black, Asian or other ethnic communities. Furthermore, the 2021 Census reports that 15.2% of residents in Camden have a disability or long-term condition that limits their day-to-day activities. This is the second highest proportion amongst London boroughs and is higher than the London average (13.2%).

Figure 1.1 – Camden in Context



South Camden

- 1.6 The South of the borough includes the neighbourhoods of Covent Garden, Holborn, Hatton Garden, Bloomsbury, Fitzrovia, Regent's Park, King's Cross and Somers Town. 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 Seven Dials in Covent Garden, offices for major businesses, and technology and life sciences clusters in the Knowledge Quarter.
- 1.7 The area is characterised by a mix of historic and modern buildings of significant scale and at high densities. Large parts of the South of the borough are also covered by conservation areas, with historic London squares and high numbers of listed

buildings. The area is also well served by open space, the largest of which is Regent's Park, which straddles both Camden and Westminster.

1.8 The South of Camden is highly accessible and has excellent public transport links, with nine underground stations, multiple bus routes and three major railway stations, connecting Camden with the rest of the UK and mainland Europe.

1.9 The area forms a significant part of London's Central Activities Zone (CAZ), a major business and employment centre, which contains a significant proportion of the borough's office floorspace, in addition to providing a diverse retail and leisure offer. This area is also home to the 'Knowledge Quarter' (KQ), an internationally significant innovation district, harnessing collaboration between private sector companies, universities, hospitals and research establishments in fields such as medical and life sciences, data analytics and machine learning, which is centred around King's Cross and Euston.

Central Camden

1.10 The Central area 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. Large parts of this area are also designated as conservation areas, and there are a number of listed and locally listed buildings.

1.11 The area contains two town centres: Camden Town and Kentish Town, in addition to several neighbourhood centres. There are also significant clusters of industrial land in Kentish Town, mainly at Regis Road and on the Murphy site.

1.12 The area has good public transport connections, with five mainline stations; six underground stations; and several local bus routes. It is also well served by public open space - the largest area being Primrose Hill, which offers panoramic views across the centre of London.

1.13 A key feature of the Central area of the borough is the Regent's Canal. The Canal is Camden's only significant open watercourse and winds through the borough from Regent's Park to King's Cross. It is an important historical feature, a designated conservation area and a site of metropolitan importance for nature conservation.

West Camden

- 1.14 The West of the borough includes the neighbourhoods of Kilburn, Fortune Green, West Hampstead, South Hampstead and 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 lie within conservation areas, and there are a number of listed and locally listed buildings.
- 1.15 The area contains three town centres: Kilburn High Road, Finchley Road / Swiss Cottage and West Hampstead, in addition to several neighbourhood centres. These centres act as community hubs, providing retail and leisure uses, community facilities and employment uses.
- 1.16 The area has good public transport connections, with six mainline stations, three underground stations and local bus routes. Key areas of open space provision in the West of the borough include: Hampstead Cemetery, Fortune Green, Maygrove Peace Park, Kilburn Grange Park, Ainsworth Park and Swiss Cottage Open Space.

North Camden

- 1.17 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 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 Conservation Areas, containing hundreds of listed buildings of architectural and historic interest.
- 1.18 Hampstead is the main town centre in this area and there are also a number of neighbourhood centres providing a more local shopping role. The North of the borough has the lowest levels of public transport accessibility in Camden and is mainly served by a number of local bus routes, with the main rail and underground services being Hampstead Heath Overground Station and Hampstead Underground Station, with Gospel Oak Overground Station and Tufnell Park, Archway and Highgate Underground Stations located nearby.
- 1.19 A key feature of the North Area is Hampstead Heath, the largest open space in the borough, providing nearly half of Camden's total area of open space and many of the borough's sporting facilities. Hampstead Heath is protected by a number of designations and contains Camden's only Ancient Woodland and Ancient Monument. The Heath's elevated position above most of London affords expansive views across the city, with four protected viewing corridors originating in this area.

1.2 The new Camden Local Plan

- 1.20 The London Borough Camden took the decision to commence a review of the current Camden Local Plan (adopted 2017) in 2022. The purpose of the review is to ensure that Camden continues to have robust and up-to-date planning policies that reflect local priorities.
- 1.21 The new Camden Local Plan will set out the Council's vision for future development in of the borough over the next 15 years and includes the planning policies and site allocations to help achieve this. It identifies how many new homes and jobs are needed to support Camden's population, and where and how they should be provided. The Local Plan will also have an important role in shaping how Camden's places look and feel, promoting inclusion, reducing inequality, enhancing the environment, tackling climate change and securing sustainable neighbourhoods.
- 1.22 The Local Plan will cover the period from 2026 - 2041. Once adopted it will replace the current Camden Local Plan (2017) and most of the Camden Site Allocations (2013). The rest of the Camden Site Allocations will be replaced by the updated Euston Area Plan.
- 1.23 The Local Plan has been prepared taking into account the comments made through community consultation and engagement, the evidence studies commissioned to support the Plan, national planning policy, the London Plan, as well as We Make Camden (the Council's Corporate Strategy) and other relevant Council plans and strategies.
- 1.24 Key challenges and issues to be addressed through the Local Plan include:
- Meeting the need for 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 and supporting the Central Activities Zone and Knowledge Quarter;
 - 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; and
 - 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.

1.3 Sustainability Appraisal and Strategic Environment Assessment

- 1.25 The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to a sustainability appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.26 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive, transposed in the UK by the SEA Regulations and amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).
- 1.27 The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA, as defined in Article 1 of the SEA Directive, is: “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development.”
- 1.28 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. The Government’s Planning Practice Guidance shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, and to present an SA Report that incorporates the requirements of the SEA Regulations. The SA and SEA of the Camden Local Plan is being undertaken using this integrated approach and throughout this report the abbreviation ‘SA’ should therefore be taken to refer to ‘SA incorporating the requirements of SEA’.
- 1.29 Appendix 1 sets out how the relevant chapters in this report meet the SEA Regulations requirements, to show how the requirements of the SEA Regulations have been met through the SA process.

1.4 Purpose of this report

- 1.30 This is the SA of the Camden Local Plan Proposed Submission Draft (Regulation 19). The purpose of this report is to:
- Set out the work that has taken place to date as part of the SA and plan making process;
 - Identify and appraise a range of growth and spatial options;

- Appraise the Council’s reasonable site options against the SA Framework, identifying each option’s likely significant effects;
- Set out and appraise the Local Plan Proposed Submission Draft, as well as the additional reasonable alternatives not considered in the Interim SA;
- Consider the cumulative effects of the policies in the Local Plan Proposed Submission Draft and identify how any negative effects associated with the implementation of individual policies can be mitigated by other policies in the Plan; and
- Recommend monitoring indicators to monitor the social, environmental and economic effects of implementing the Camden Local Plan.

1.31 This report builds on the ‘interim’ SA of the draft Local Plan that was published in January 2024 and the SA Scoping Report that was prepared in 2023. It also takes into account the findings of the SAs that were undertaken of the Draft Site Allocations Local Plan 2020, the Camden Local Plan 2017, the Site Allocations Plan 2013, and the Euston Area Plan 2015, which remain relevant.

1.5 Structure of this report

1.32 This chapter of the SA report has introduced the London Borough of Camden, the new Camden Local Plan and the SA process. The remainder of the report is structured into the following chapters.

- **Chapter 2** describes the method used to carry out the SA and any difficulties encountered in applying the method.
- **Chapter 3** describes the relationship between the Local Plan and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of the borough; identifies the key sustainability issues; and sets out the SA framework.
- **Chapter 4** describes the results of the SA of the growth and spatial options considered in the drafting of the Local Plan, including discussion on the site options considered for allocation in the Local Plan Proposed Submission Draft.
- **Chapter 5** sets out the reasonable alternatives considered in the preparation of the Camden Local Plan Proposed Submission Draft.
- **Chapter 6** describes the results of the SA of the vision and objectives set out in the Local Plan Proposed Submission Draft.
- **Chapter 7** describes the results of the SA of the policies in the Local Plan Proposed Submission Draft, including reasonable alternative policy options not previously considered during the preparation and SA of the Draft Local Plan.
- **Chapter 8** sets out the SA monitoring framework for monitoring the significant effects of the Local Plan Proposed Submission Draft.

- **Chapter 9** sets out conclusions relating to the SA findings presented in the preceding chapters of the SA Report and the next steps in the Local Plan and SA processes.
- **Appendix 1** - Meeting the requirements of the SEA Regulations
- **Appendix 2** - Representations received – Scoping Report and Interim Sustainability Appraisal (Regulation 18)
- **Appendix 3** – SA of policy options (reasonable alternatives)
- **Appendix 4** - SA of the vision and objectives and policies in the Local Plan Proposed Submission Draft
- **Appendix 5** - Discounted sites

Chapter 2 - Methodology

2.1 National Planning Policy Guidance sets out how SA/SEA should be undertaken as part of the plan-making process. The SA of the Camden Local Plan has been carried out in accordance with this. The key stages of SA process are set out below.

2.1 Stage A – Scoping

2.2 The purpose of the scoping stage is to understand the social, economic and environmental baseline for the Plan area, as well as the sustainability policy context and key sustainability issues, to inform the development of the SA Framework. The work undertaken as part of the scoping stage of the SA for the Camden Local Plan is set out below.

Review other relevant policies, plans and programmes to establish policy context

- 2.3 The Local Plan is not prepared in isolation and is influenced by other policies, plans and programmes at an international, national and strategic level. Given this, there is a requirement for SA to take into account the relationship between the Local Plan and other relevant policies, plans, programmes and sustainability objectives.
- 2.4 A review was therefore undertaken of other policies, plans, and programmes at the international, national, regional and local levels that were considered relevant to the scope of the Local Plan. The review is presented in the Scoping Report (2023), which is published on the Council's website.

Collect baseline information to establish sustainability context

- 2.5 Information on existing environmental, social and economic characteristics in the plan area provides the baseline against which the plan's effects can be assessed in the SA and monitored during the plan's implementation.
- 2.6 Baseline information can also be combined with an understanding of drivers of change, that are likely to persist regardless of the local plan, to understand the likely future sustainability conditions in the absence of the local plan.
- 2.7 The SEA Regulations require the Environmental Report (the SA) to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of the likely future, together with the assessed effects of the plan itself, additionally allows the SA to report on cumulative effects, another requirement of the SEA Regulations. The SEA Regulations require assessment of effects in relation to the following 'SEA topics': biodiversity,

population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these.

- 2.8 Baseline information was therefore collected in relation to the SEA topics and additional sustainability topics were also addressed, covering broader socio-economic issues. This reflects the integrated approach that is being taken to the SA and SEA processes. Baseline information for Camden is presented in Chapter 3 of the Scoping Report.

Identify sustainability issues

- 2.9 The review of the baseline information and relevant policies, plans and programmes enabled the identification of existing sustainability issues, including problems, as required by the SEA Regulations. Sustainability issues and their likely evolution without the Local Plan are detailed in Chapter 4 of the Scoping Report and summarised in Chapter 3 of this SA.

Develop the SA framework

- 2.10 The SA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan.
- 2.11 The sustainability objectives in the SA Framework have been developed from the previous SA objectives used during the sustainability appraisal of the Camden Local Plan 2017 and draft Site Allocations Local Plan (2020), and updated based on the review of other policies, plans and programmes and the review of baseline information referred to above, which identified key sustainability issues facing Camden.
- 2.12 The SA Framework that has been used to assess the Local Plan is set out in Chapter 3.

Consult on the scope and level of detail of the SA

- 2.13 The SEA Regulations require that statutory consultation bodies (the Environment Agency, Historic England and Natural England) are consulted “when deciding on the scope and level of detail of the information that must be included” in the SA Report.
- 2.14 The Council therefore consulted the above statutory consultees as part of the preparation of the scoping report. This consultation was undertaken from April to March 2023 for a period of 5 weeks. The representations received to this

consultation are set out in Appendix 2 to this SA. The SA Scoping report was then updated, where required, to take on board the comments made.

2.2 Stage B – Developing and Refining Options and Assessing Effects

- 2.15 Developing options for a plan is an iterative process, usually involving consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other ‘reasonable alternatives’ to the options being considered for a plan.
- 2.16 In relation to the SA Report, Regulation 12 (2) of the SEA Regulations requires that: “The report must identify, describe and evaluate the likely significant effects on the environment of - (a) implementing the plan or programme; and (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”
- 2.17 The SEA Regulations require that the alternative policies and site allocations considered for inclusion in a plan that must be subject to SA are ‘reasonable’, therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site allocation options that are unsuitable, unavailable or undeliverable.
- 2.18 The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as consultation responses, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.
- 2.19 The following sections describe the process that was followed in identifying and appraising options for the Camden Local Plan. The alternative options were identified by the Council based on the most up-to-date evidence. The stages of option development and accompanying SA to date are outlined below.

Identifying and appraising the options for the Regulation 18 Draft Local Plan

Growth and spatial options

- 2.20 Following an examination of the local context and Plan objectives, strategic influences, site options and sub-area scenarios, the Interim SA identified three reasonable growth scenarios. These were:
- Lower growth – delivering around 10,500 additional homes over the plan period to 2041;
 - The emerging proposed approach – delivering around 11,550 additional homes over the plan period to 2041;
 - Higher growth – delivering around 12,850 additional homes over the plan period to 2041;
- 2.21 The Interim SA then appraised these three growth scenarios under the SA Framework, to assess which option performed best and what the effects of that option would be, that is, would it have a 'significant effect'.
- 2.22 Further information on the options considered and appraised, as well as each option's potential significant effects can be found in sections 5 and 6 of the Interim SA, published on the Council's website.

Site options

- 2.23 A number of site options were appraised against the SA Framework as part of the SA of the Draft Local Plan. These are set out in Appendix 2 of the Interim SA.

Policy options

- 2.24 The Interim SA of the Regulation 18 Draft Local Plan included an appraisal of the draft policies. The appraisal findings were presented under the 15 topic headings that together comprise the core of the SA framework (see Chapter 3). For each topic, the Interim SA included consideration of the merits of the approach and considered alternative policy approaches, where identified, before reaching a conclusion on significant effects.

Identifying and appraising the options for the Regulation 19 Proposed Submission Version Local Plan

Growth and spatial options

- 2.25 The appraisal of the three growth scenarios set out in the Interim SA has been reviewed and updated based on the responses to the consultation and engagement undertaken on the draft Local Plan and further available evidence. As part of this, assumptions around the levels of economic growth associated with each growth option have been clarified, as have the reasons why the Council has selected the preferred growth option and discounted the other two options. No new growth options have been identified or appraised.

Site options

- 2.26 The appraisal of the site options set out in the Interim SA has been reviewed and updated based on the responses to the consultation and engagement undertaken on the draft Local Plan and further available evidence, including the Health Impact Assessment and Equalities Impact Assessment of the draft Local Plan.
- 2.27 Additional site options have also been considered following the consultation on the draft Local Plan and work to identify sites to meet the accommodation needs of Gypsies and Travellers and these have subsequently been appraised in the SA, alongside the options appraised earlier in the plan-making process.
- 2.28 Further details of the site options considered and appraised can be found in Chapter 4 and in Appendices 4 and 5.

Vision and objectives

- 2.29 Whilst the Interim SA set out the vision and objectives of the draft Local Plan it did not appraise them. An appraisal of the vision and objectives of the Local Plan Proposed Submission Draft has therefore been undertaken and this is set out in Chapter 6 of this report, and with the SA table presented in Appendix 4.

Policy options

- 2.30 The appraisal of the policy options set out in the Interim SA has been reviewed and updated based on the responses to the consultation and engagement undertaken on the draft Local Plan and further available evidence, including the Health Impact Assessment and Equalities Impact Assessment of the draft Local Plan.
- 2.31 Chapter 4 describes the additional options considered in the drafting of the policies in the Local Plan Proposed Submission Draft and highlights their likely differences in significant effects, before the appraisal of the final policies is set out in Chapter 7.

Appraisal methodology

Growth and spatial options

- 2.32 The appraisal of the growth options is presented under 15 headings – one for each of the objectives that together comprise the SA framework, before the 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’ (see Table 2.1 below).
- 2.33 The findings of the appraisal of the three growth scenarios are set out in Chapter 4.

Vision and objectives, Site options and Policy options

- 2.34 The vision and objectives, site options and policy options presented in the Local Plan Proposed Submission Draft have also been appraised against the SA framework. The findings of the SA are presented as colour coded symbols showing the significance of the likely effect of each site option, policy or site allocation in relation to each SA objective, along with a concise justification for the effect identified, where appropriate. The colour coding is shown in Table 2.1 below.

Table 2.1: Key to SA effects symbols

Key	Effect
++	Significant positive effect
+	Positive effect
0	Neutral effect
-	Minor negative effect
--	Significant negative effect
?	Uncertain effects

- 2.35 For each objective the aim is to discuss the merits of the 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’. 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.
 - 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.

- 2.36 Where an effect is uncertain, a question mark has been added and the symbol has been colour coded yellow. Neutral effects were recorded where a policy or site allocation was considered to have no effect in contributing to achievement of the SA objective.
- 2.37 Every effort has been made to predict effects accurately; however, this inevitably requires a series of judgements to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy in relation to the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. Effects are relative to the scale of proposals under consideration.
- 2.38 The likely sustainability effects of the Camden Local Plan Proposed Submission Draft are summarised in Chapters 4, 5, 6 and 7 with the SA appraisal tables included at Appendix 3 and 4.

2.3 Stage C – Preparing the SA Report

- 2.39 This SA report documents the process that has been undertaken in carrying out the SA of the Camden Local Plan. It sets out the findings of the appraisal of options, highlighting any likely significant positive and negative effects. These findings are set out in Chapters 4, 5, 6 and 7 of this SA Report. Where relevant, the Report also makes recommendations that may help to avoid or mitigate negative effects and maximise the benefits of the policies.

2.4 Stage D – Consultation on the Local Plan and the SA Report

- 2.40 The draft Local Plan and Interim SA report have been subject to public consultation, as set out above.
- 2.41 The Camden Local Plan Proposed Submission Draft and this SA report will now be published for comment as part of the plan-making process. These documents are available to view on the [Council's website](#). Any comments received on the SA report will be reported as part of the Local Plan examination process.

2.5 Stage E – Monitoring the Implementation of the Local Plan

2.42 Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the Camden Local Plan are set out in Chapter 7.

2.6 Difficulties Encountered

2.43 The SEA Regulations, Schedule 2(8) require the Environmental Report to include: “...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.”

2.44 Notable limitations of the SA process to date include:

- Given the number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies, it has not been possible within the resources available to consider every potentially relevant document in detail. However, we have drawn out the key messages relevant to the preparation of the Local Plan and the SA.
- The baseline evidence gathered as part of the preparation of the SA Scoping Report represents a snapshot in time. Every effort has been made to ensure that this reflects the latest position at publication.
- Every effort has been made to predict effects accurately; however, this is inherently challenging. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future).
- A significant proportion of the proposed site allocations already have planning permission and, given this, it is fair to assume that the new Camden Local Plan will have little or no bearing on their development, albeit it is not uncommon for revised planning applications to be submitted. It therefore follows that these sites need not be a focus of the SA.

2.7 How the Sustainability Appraisal Process has Influenced the Contents of the Camden Local Plan Proposed Submission Draft

2.45 To look at how the SA process has influenced the contents of the Camden Local Plan Proposed Submission Draft, it is necessary to start by looking at Camden’s current adopted Development Plan.

2.46 Key documents in Camden’s Development Plan include the London Plan (2021), the Camden Local Plan (2017), the Site Allocations Plan (2013), the Euston Area Plan (2015) and the Fitzrovia Area Action Plan (2014). Together these documents set out the Council’s overarching strategy and approach to the delivery of new development in Camden. All been subject to SA and found sound by an Inspector at examination.

- 2.47 In addition to this the Council has also prepared a number of planning frameworks, in consultation with the local community, to guide the development of the main growth areas identified in the Camden Local Plan. Furthermore, neighbourhood plans have been made for a number of parts of the borough: Fortune Green and West Hampstead (adopted in 2015); Kentish Town (2016); Highgate (2017); Hampstead (2018); Dartmouth Park (2020); Camley Street (2021); and Redington Froggnal (2021). These plans set out the communities' visions for the designated neighbourhood areas, and a range of planning policies, which are used alongside the Council's own adopted policies when making planning decisions in these neighbourhood areas.
- 2.48 Following the adoption of the Local Plan in 2017, work started on the preparation of a new Site Allocations Local Plan, which was due to update the Site Allocations Plan adopted in 2013. As part of this, site allocations were selected to deliver the strategy set out in the Local Plan. Further explanation as to why sites were selected, and other sites were excluded, is set out in Chapter 4 and Appendix 6 of this SA.
- 2.49 The draft Site Allocations Local Plan was published for public consultation in 2020 and again in 2021/22. The 'Interim' SA of the draft Site Allocations Local Plan was also published at the same time.
- 2.50 In 2022, the decision was taken to progress a review of the Camden Local Plan 2017 and incorporate the proposed site allocations from the draft Site Allocations Local Plan into the new Local Plan. The new Local Plan takes a more area-based approach to the delivery of development, with area policies for the South, Central, West and North areas of the borough setting out the Council's approach to the delivery and location of new homes, jobs, retail and leisure uses, and infrastructure in each of these areas, in line with the Plan's vision and objectives. However, the overall approach to the distribution of development in Camden remains broadly the same as that set out in the Local Plan 2017. This is primarily due to the limited availability of land in Camden which is a constraint on the level of development that can be brought forward.
- 2.51 Delivering sustainable development in Camden is a key aim of the Local Plan, informed by the findings of the SA. The development strategy aims to address the long-term needs of the borough and respond to the challenges it faces. It seeks to maximise opportunities for providing new and affordable homes, jobs, and the infrastructure required to support this, whilst seeking to ensure that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents.
- 2.52 The SA Report prepared and published alongside the Regulation 18 Draft Local Plan identified the effects of the policies and site allocations within that Plan. These effects were used alongside updates to the Council's evidence base and representations from the Regulation 18 consultation to make changes to the policies and site allocations in the Regulation 19 Local Plan Proposed Submission Draft.
- 2.53 The Council considers that the policies in the Plan strike an appropriate balance between avoiding significant adverse effects and supporting sustainable development and are in line with legal and planning requirements. Furthermore,

when looking at the effects of the policies identified in the SA, it is important to note that, in the majority of cases, these can be mitigated by other policies in the Plan, and that the Plan should be read as a whole.

Chapter 3 - Sustainability Context

- 3.1 The Camden Local Plan is not prepared in isolation and is influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and the historic environment.
- 3.2 This chapter provides an overview of the plans, policies and programmes that have been reviewed as part of the SA process; sets out the sustainability context for Camden and highlights key sustainability issues for the Local Plan; in addition to establishing the sustainability appraisal framework to be used in the appraisal process.

3.1 Plans, Policies and Programmes

- 3.3 The SA must take into account the relationship between the Local Plan and other relevant policies, plans, programmes and sustainability objectives. It must also conform to environmental protection legislation and the sustainability objectives established at international, national and regional level.
- 3.4 Schedule 2 of the SEA Regulations requires:
- (a) “an outline of the...relationship with other relevant plans or programmes”; and
 - (e) “[that] 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”.
- 3.5 Identifying and reviewing these documents is an important element of the SA and SEA process, as it can help to shape the objectives against which the Plan should be appraised, as well as indicating any particular issues and problems that need to be addressed. Potential synergies, inconsistencies and constraints can also be identified.
- 3.6 A full assessment of relevant documents has been undertaken as part of the preparation of the SA Scoping Report to identify the relevant objectives and targets from the plans reviewed and their potential implications for the sustainability appraisal objectives and the Local Plan. The review of relevant plans, programmes and policies is available to view at Appendix 1 of the Scoping Report.

3.2 Sustainability Context

3.7 Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of: “(3) The environmental characteristics of areas likely to be significantly affected.”

3.8 The SA Scoping Report sets out the detailed policy context, baseline, and key sustainability issues (including their likely evolution without the Local Plan) for Camden. The baseline information has been collected under a number of subtopics, which can be classified as environmental, social or economic. To demonstrate how the SEA topic areas (as set out in Annex 1 of the SEA Directive) have been covered, these are included in brackets beside the relevant SA subtopic as follows:

- Transport and connections (*air, human health, climatic factors*)
- Cultural heritage and landscape (*cultural heritage, landscape*)
- Development on previously developed land (*material assets, soil*)
- Natural environment (*landscape, biodiversity, flora and fauna, soil, human health*)
- Air quality (*air, human health, climatic factors*)
- Water and flooding (*water, climatic factors*)
- Climate factors (*climatic factors*)
- Recycling and waste management (*population, human health, water*)
- Population (*population*)
- Health and wellbeing (*human health*)
- Community (*human health*)
- Deprivation and social exclusion (*population*)
- Education (*population*)
- Housing (*material assets, population*)
- Economic growth
- Employment
- Business sectors

3.9 The description of the key issues and the likely future evolution of the baseline without the review of the Local Plan considers past trends and current pressures. It is recognised that development in Camden will not be delivered in isolation from those areas around it. The effect of delivering new development and supporting infrastructure will often be transmitted across administrative boundaries. As such, the SA Report also considers the cumulative effect of delivering new development with consideration for growth being proposed in neighbouring authority areas.

3.10 SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment

of future plans. Data gaps are referenced where necessary in the SA Scoping Report. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data is published.

3.3 Sustainability Issues

- 3.11 Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of: “(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”
- 3.12 Table 3.1 presents the key sustainability issues that have been identified through the analysis of the baseline and the review of relevant policies, plans and programmes. The likely evolution of these issues without implementation of the Local Plan is set out in detail in the SA Scoping Report. These sustainability issues have been updated where relevant new information and supporting evidence has been collected.

Table 3.1 – Key Sustainability Issues for Camden

Sustainability Issue	Summary of issue
Environmental	
Need to make improvements to active travel	<ul style="list-style-type: none"> • Cycle mode share among residents has remained low. Residents in the north of the borough are further away from the majority of the new high quality cycle infrastructure being delivered. There is therefore a need to push cycle routes further north to ensure that they form part of a comprehensive network and are continuous and connected. • Walking is a primary mode of transport for Camden residents – need to ensure walking routes are clutter free, safe, and less polluted.
Balancing development pressures, ensuring contextually successful design, and the protection of Camden’s heritage	<ul style="list-style-type: none"> • Camden is an inner London borough with a rich architectural heritage – key issues highlighted mean there are a number of pressures such as Camden’s housing target, supporting a thriving economy, and the climate and ecological emergency. • Given the scale of growth required in the borough and the coverage of heritage designations, design policy needs to respond to this issue by ensuring contextually successful development.

Sustainability Issue	Summary of issue
Need to reduce carbon dioxide emissions to meet the borough's target	<ul style="list-style-type: none"> Ensuring Camden reaches its 2030 net zero carbon target is a challenge which requires positive action in the built and natural environment.
Adaptation to a changing climate	<ul style="list-style-type: none"> The likelihood of heatwaves and flood events reoccurring is likely to increase as a result of climate change – our buildings and natural environment need to be designed to be more resilient to these changes.
Limited scope for creating new open space	<ul style="list-style-type: none"> Open space plays an important environmental and social role – supporting biodiversity, helping to tackle the climate emergency, and promoting health and well-being (through encouraging exercise and social interaction). The majority of new development in the borough occurs on previously developed land and the fact that there is a significant shortage of available land for development means the is limited scope for creating new open space. The areas of greatest deficiency are in the following parts of the borough: Central London East; SE and NW of Hampstead and Highgate; Kentish Town area; east of Regent's Park area; and SW of Somers Town area. (Open Spaces Needs Assessment Report, 2014)
Poor air quality	<ul style="list-style-type: none"> Camden has some of the poorest air quality in Europe, especially in the south of the borough where traffic congestion is severe. Since 2000, the whole borough is designated an Air Quality Management Area. Air pollution does not affect everyone equally. Less affluent neighbourhoods and Black, Asian and minority ethnic communities typically experience worse health outcomes as a result of air pollution exposure. (Camden Clean Air Action Plan 2023 – 2026) The burning of natural gas for heating in domestic and commercial buildings accounts for 42% of nitrogen dioxide emissions and 12% of Particulate Matter 2.5 emissions in Camden, and is also a major contributor to carbon dioxide emissions in the borough. Road transport accounts for almost half of nitrogen dioxide emissions and a quarter of Particulate Matter 2.5 emissions in Camden, as well as 14% of carbon dioxide emissions.

Sustainability Issue	Summary of issue
	<ul style="list-style-type: none"> • Economic growth is a continuous driver for freight movement in and around London. Most delivery vehicles use diesel fuel and travel significant distances. These transport movements have a disproportionate impact on air quality in Camden. • Construction activity involves the use of large machines, often powered with diesel engines, as well as processes which can cause dust to become airborne (for example from building demolition). Construction therefore has a significant impact on local air quality and potentially public health if it is not carefully managed. Construction activity is responsible for 9% of nitrogen dioxide emissions, 45% of Particulate Matter 10 emissions and 13% of Particulate Matter 2.5 emissions in Camden (Camden Clean Air Action Plan 2023 – 2026).
Potential contamination on previously developed land	<ul style="list-style-type: none"> • While no sites in the borough are currently designated as contaminated for the purposes of the Environment Act 1990 Part II A, numerous sites in the borough have been previously utilised for industry and other potentially polluting uses and this may pose contamination issues at these locations.
Risk of surface water and groundwater flooding in parts of the borough	<ul style="list-style-type: none"> • Although there are no areas at risk of flooding from rivers or the sea in Camden, the borough experienced significant surface water flood events in 1975, 2002, and 2021. • The proportion of developed land (impermeable surfaces) in Camden increases surface water flooding risks, so it is important that development considers appropriate measures of drainage. • There are 14 Local Flood Risk Zones in Camden. Local Flood Risk Zones represent the spatial extent of predicted flooding in a single location (Camden SFRA 2024). • Historic watercourses - The River Fleet, River Tyburn and River Westbourne were culverted and integrated into the local sewer network in the 19th Century. These are now referred to as 'lost' rivers. Groundwater flows within the River Terrace Deposits and Bagshot Formation would typically follow the course of these 'lost' rivers. Basement developments within proximity to a 'lost' river may be more susceptible to groundwater flooding, due to the culverting of the former river channel and subsequent impact on flow regimes and surrounding groundwater level. • Records suggest multiple incidents of flooding from sewer surcharge and blockages in areas underlain by the 'lost' rivers. It is not possible to determine whether a 'lost' river is the main cause of the sewer flooding; however, it is likely a contributing factor. • Sewer flooding - This may occur where a rainfall event exceeds the capacity of the sewer system, the sewer system

Sustainability Issue	Summary of issue
	<p>becomes blocked by debris or sediment, or the system surcharges due to high water levels in receiving watercourses.</p> <ul style="list-style-type: none"> • Groundwater - Following a period of prolonged rainfall there is potential for groundwater flooding in the north of the Borough, due to the capacity for groundwater storage. There is an increased potential for groundwater flooding in the southern region of the Camden. • Counters Creek – This is a lost river in northwest London. Areas of Camden within the Counters Creek Catchment are likely hydraulically connected to the downstream reaches. Evidence collated by Royal Borough of Kensington and Chelsea suggests the 2007 floods were caused by extreme rainfall in areas such as Camden, which led to exceeded sewer capacity in the downstream catchment area. (Camden SFRA 2024).
Water supply and use	<ul style="list-style-type: none"> • Camden is within Thames Water’s London Water Resource Zone which is classified as ‘seriously water stressed.’ This means there is a high population with high water demands and limited water availability. (Environment Agency)
Water quality and environmental impact	<ul style="list-style-type: none"> • Camden has groundwater source protection zones I & II. • Special Protection Zones (SPZ) have been identified to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. It is for this reason that certain development types may be deemed unacceptable where they pose a risk of contamination to groundwater. High polluting activities, such as petrol stations or cemeteries should be directed away from SPZ1. Further guidance can be found at https://www.gov.uk/government/publications/groundwater-source-protection-zones Site allocations in SPZ should follow guidance and advice from Environment Agency. • The Upper Chalk aquifer should be taken in full consideration where developments where deep piled foundations are proposed. Should foundation works penetrate through the London Clay to the Chalk then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised. • The Grand Union Canal has moderate status which is a change from good in 2009 (following further investigation) and the Regent’s Canal remains at moderate status due to mitigation measures not yet in place which would make the watercourse more natural. (Please see Water Framework Directive and Thames River Basin Management Plan) (Environment Agency)

Sustainability Issue	Summary of issue
Protection and enhancement of biodiversity	<ul style="list-style-type: none"> Camden has 38 areas designated as Sites of Importance for Nature Conservation (SINC), covering almost 414 hectares. Some of these are managed by the Council, the rest owned by various organisations, most notably the City of London Corporation, the Royal Parks and Network Rail. These SINCs form the core of Camden’s wildlife network and their protection, enhancement and connectivity to surrounding habitat is a priority. Green Infrastructure delivers biodiversity benefits and climate change adaptation. Open spaces can serve as flood storage areas if they are located in areas of high risk of flooding. Green spaces and buffer zones can provide amenity benefits, biological enhancements, sustainable drainage and reduction in surface/storm water flooding. Green roofs can also be a valuable amenity space. The protection and enhancement of biodiversity is considered as a key sustainability issue.
<p>Low household recycling rates</p> <p>Targets not achieved for construction and demolition waste</p>	<ul style="list-style-type: none"> The rate of recycling of household waste is struggling to exceed 30%, not meeting the 50% target. (ENV18 - Local authority collected waste: annual results tables) Measures are required to increase the proportion of construction and demolition waste which is reused, recycled or recovered.
Social	
Providing suitable housing for a growing population	<ul style="list-style-type: none"> The London Plan sets Camden a ten-year minimum housing target of 10,380 homes over the period 2019/20 – 2028/29 (an average of 1,038 homes per year). The number of homes delivered in Camden has varied over the last ten years; however since 2017 the number of new homes being approved has fallen below the number needed to meet the housing target. The London Plan states: “While London is a ‘young city’, it is expected to experience substantial growth in its older population. By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent. Appropriate accommodation is needed to meet the needs of older Londoners.” Living in safe and decent housing is an essential aspect of a good life. Good housing provides basic needs such as shelter, warmth, safety and privacy. Adequate and affordable

Sustainability Issue	Summary of issue
	<p>housing is a basic need that everyone should have. The Local Plan has a key role to play in delivering this ambition in addition to seeking a range of housing types, sizes, accessibility and affordability that meet the needs of different groups, including families, to tackle inequality and overcrowding, create sustainable and resilient neighbourhoods, improve health and wellbeing and secure a supply of housing suitable for individuals and families on low and middle incomes.</p>
<p>The affordability of housing and the supply of affordable housing in Camden</p>	<p>Camden 'State of the Borough Report' 2024 noted -</p> <ul style="list-style-type: none"> • Camden has a higher proportion of residents living in private rented housing. Monthly rents in the private rented sector in Camden are the third highest in the country, meaning Camden is one of the least affordable places to live in the UK. (Median Rent (Private and Social) Table 702 Private rental market summary statistics in England ONS; Tables on rents, lettings and tenancies DLUHC, Private rental market summary statistics in England - Office for National Statistics) • Median house prices in Camden (£880,889) are significantly more expensive than London (£527,979), and nearly three times as expensive compared to England and Wales (£301,350). The average house in Camden costs around 21.4 times the London median income. This is a higher house price to income ratio than both London (13 times) and England and Wales (9 times) (Median house prices, London DataStore / Land Registry)
<p>Wide disparities between deprived and affluent areas in the borough</p>	<ul style="list-style-type: none"> • There are wide disparities of deprivation and affluence within Camden wards. • The Indices of Deprivation 2019 ranks Camden 139th most deprived out of 317 districts in England. The most deprived area in Camden (E01000890 in Gospel Oak ward) is within the 13% most deprived areas in England. By contrast, Frognal and Fitzjohns ward is home to the least deprived Lower Super Output Area (LSOA) in Camden; 4 out of its 8 LSOAs fall within the 10% least deprived LSOAs in England. • A large proportion of children in Camden are growing up in poverty. In 2019-20 37.2% of children in Camden live in low income families (60% below median income). • High levels of crime deprivation are concentrated mostly in the borough's more densely populated areas: Camden Town, Primrose Hill, Kilburn, King's Cross and Somers Town.
<p>Large health inequalities within Camden</p>	<ul style="list-style-type: none"> • Air pollution causes health difficulties and avoidable deaths. Two thirds of children from Camden being admitted to hospital due to asthma are living in the two most deprived

Sustainability Issue	Summary of issue
	<p>quintiles in the borough, while the least deprived quintiles account for only 15% of admissions.</p> <ul style="list-style-type: none"> • There are large inequalities in the pre-75 mortality rate from causes considered preventable in Camden. Somers Town has the highest number of preventable deaths in Camden with 180 per 100,000. The Medium Super Output Areas with the lowest number of preventable deaths – of 40 deaths per 100,000 or lower, are located in some of Camden’s most affluent areas, namely South Hampstead, Hampstead Town and Frognal. • Loneliness has a significant impact on wellbeing, and is correlated with early deaths and health risks, hospital readmissions, and lower performance and productivity in the workplace. In Camden, the share of adults who reported feeling lonely was 36.3% in Camden in 2019/20, higher than all other London boroughs. London also saw higher levels of loneliness (23.7%) compared to the England average (22.3%). (Percentage of adults who feel lonely, always, often or some of the time, Active Lives Adult Survey, Sport England 2022 - access via Fingertips Public Health Outcomes Framework, Public Health England)
<ul style="list-style-type: none"> • Economic 	
<p>Vacancy rates in Camden’s centres are increasing</p>	<ul style="list-style-type: none"> • Vacancy rates in Camden’s centres dropped from 8.19% to 6.63% between 2022 and 2024, demonstrating a return to pre-pandemic levels of near 6%. • Vacancy rates in Central London Frontages are however higher, at just over 9%. This is linked to a number of units currently being refurbished or redeveloped (8%). • The Government’s changes to permitted development rights have reduced the Council’s ability to influence planning and development within centres, including policies for managing the mix of uses in centres and frontages.
<p>Improving skills and qualifications</p>	<ul style="list-style-type: none"> • Camden’s residents are highly qualified and well educated compared to London and England. However, a sizeable proportion (12%) of residents have the lowest level or no qualification and are significantly disadvantaged in the labour market • Only 20% of Camden’s pupils go to a Further Education (FE) college, which is nearly half the number that attend FE colleges in England (36%) • In 2023, 95.8% of all young people in Camden aged 16-17 were in education, employment or training (EET), which means that 4.2% were not in employment, education or training (NEET). Efforts are required to maintain this low level. (Proportion of 16 and 17 year olds participating in education, employment or training (EETs) Participation in education,

Sustainability Issue	Summary of issue
	training and NEET age 16 to 17 by local authority, academic year 2022/23, Department for Education)
Ensure range of provision for employment clusters to accommodate need	<ul style="list-style-type: none"> • Employment in Camden is relatively low and economic inactivity is relatively high in comparison with London and England. This is mostly explained by the large number of students living in the borough, but there are also residents that face significant barriers to accessing employment. (Camden State of the Borough Report 2024) • According to the latest data, the estimated employment rate was 74.8% in the year ending September 2023.6 This rate is comparable to London (74.6%) and lower than Great Britain (75.8%). (https://www.nomisweb.co.uk/reports/lmp/la/1946157246/report.aspx?town=camden) • In 2022, 61% of jobs in the borough were located in the central London, to the south of Euston Road; a quarter of jobs (23%) were concentrated in the central Camden Town / Euston / Regent's Park / Somers Town areas; while the remainder of Camden's jobs (16%) were scattered across town centres and employment sites in the north and west of the borough (Hampstead, Kentish Town, Swiss Cottage). • Camden specialises in highly skilled, high value parts of the economy such as law, management consultancy and advertising. • The largest industrial sector in Camden is Professional, Scientific & Technical enterprises. This provides 83,000 jobs (21% of all jobs), compared with 15% for London as a whole. Employment losses have occurred in Business Administration and Support (-20%), Accommodation and Food services (-16%) and Manufacturing (-13%). • Camden has a strong night-time economy, both in terms of jobs and number of businesses, mostly concentrated in the South of the borough.
Balancing the demand for housing with the protection of employment land	<ul style="list-style-type: none"> • The total amount of commercial property available in the borough is increasing but the pressure on employment space resulting from high land values, housing need and permitted development remains significant.

3.4 The SA Framework

3.13 The SA appraises the likely significant effects of the Local Plan in relation to whether they will help to meet a set of sustainability objectives – the ‘SA framework’.

3.14 The SA objectives set out in Table 3.2 have been developed from the previous SA objectives used during the sustainability appraisal of the Camden Local Plan (2017) and draft Site Allocations Local Plan (2020) and updated to take into account changes in the key sustainability issues facing the borough and updates to the international, national, sub-regional and local policy objectives that provide the context for the Plan.

3.15 The SA framework is set out in Table 3.2. The final column indicates the relationship between the SA objective and the SEA Regulation environmental topics: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; and landscape.

Table 3.2 – The SA Framework

Ref.	SA objective	Sub-criteria Will the Local Plan...	SEA Topic
Social			
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> a) 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? 	Population, Material assets
2	To promote a healthy community	<ul style="list-style-type: none"> 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? 	Population, Human health

Ref.	SA objective	Sub-criteria Will the Local Plan...	SEA Topic
		<ul style="list-style-type: none"> 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)? 	
3	To tackle poverty and social exclusion and promote equal opportunities	<ul style="list-style-type: none"> 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 (social value)? 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? 	Human health, Population
4	To improve amenity by minimising the impacts associated with development	<ul style="list-style-type: none"> a) Ensure that the amenity of neighbours is not unduly impacted? b) Ensure that development and operations will not affect noise sensitive uses? 	Human health
Environmental			
5	To conserve and improve open space provision	<ul style="list-style-type: none"> a) Help to protect, increase/improve open space? 	Biodiversity, flora and fauna, Human Health, Landscape

Ref.	SA objective	Sub-criteria Will the Local Plan...	SEA Topic
6	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<ul style="list-style-type: none"> 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? d) Provide for new re-naturalised areas? e) Protect and provide for the protection and planting of more trees in the borough? 	Biodiversity, flora and fauna, Human health
7	To improve local air quality and limit exposure	<ul style="list-style-type: none"> 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 and cycling? 	Human health, Air
8	To promote the efficient use of energy, water and other natural resources, throughout the life of the development	<ul style="list-style-type: none"> 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? 	Climatic factors, Soil, Human health

Ref.	SA objective	Sub-criteria Will the Local Plan...	SEA Topic
		f) Encourage sustainable design and construction?	
9	To protect and manage water resources (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)	Water, Biodiversity, flora and fauna, Soil, Population
10	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?	Climatic factors, Water, Biodiversity, flora and fauna, Soil, Population
11	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? b) Ensure enhancement of the public realm and local distinctiveness? c) Encourage the use of sustainable design and construction methods?	Cultural heritage, Climatic factors

Ref.	SA objective	Sub-criteria Will the Local Plan...	SEA Topic
12	To protect and enhance the historic environment	<ul style="list-style-type: none"> 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? 	Cultural heritage
Economic			
13	To ensure new development makes efficient use of land, buildings and infrastructure	<ul style="list-style-type: none"> 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? 	Material assets, Soil,
14	To encourage and accommodate sustainable economic growth and employment opportunities	<ul style="list-style-type: none"> 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? 	Material assets, Population
15	To ensure our designated centres remain sustainable and	<ul style="list-style-type: none"> a) Encourage occupation of units and reduce vacancy rates? 	Material assets, Population

Ref.	SA objective	Sub-criteria Will the Local Plan...	SEA Topic
	adaptable for the future	b) Consider changing trends and patterns in how people use the designated centres?	

Chapter 4 - Sustainability Appraisal of the Growth and Spatial Options

4.1 Local Plan policies and site allocations should support and deliver a preferred growth and spatial strategy. Given this, one of the key priorities in the development of a Local Plan is to identify and appraise a range of growth and spatial options:

- **Growth options** represent the range of potential scales of housing and economic growth that could be planned for over the Local Plan's lifespan (the Local Plan period).
- **Spatial options** represent the range of potential locational distributions for the various growth options over the Local Plan period

4.2 The consideration of options (or 'reasonable alternatives') is one of the most important parts of the SA process. National Planning Practice Guidance states that "The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted." It goes on to state that "Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made."

4.3 There is a legal requirement to examine reasonable alternatives (RAs) taking into account the objectives and geographical scope of the plan (see Section 1). Given this, this SA focuses 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 support the achievement of wider plan objectives.

4.4 This focus serves to ensure the alternatives are clear, mutually exclusive and meaningfully different.

4.5 This chapter therefore seeks to:

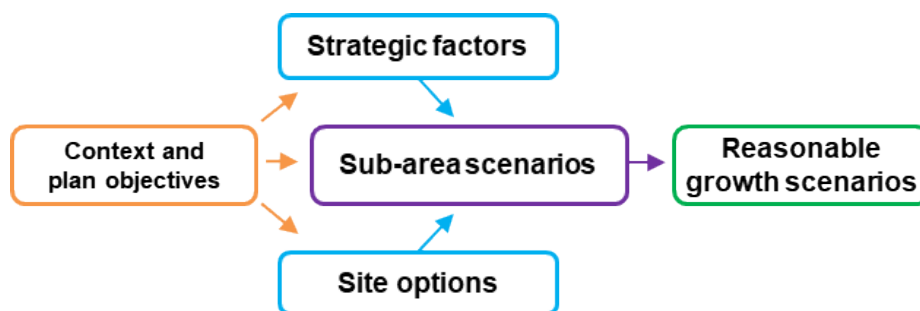
- explain the reasons for selecting the alternatives dealt with - see **Section 4.2**
 - present an appraisal of the reasonable alternatives - see **Section 4.3**
 - explain the Council's reasons for selecting the preferred option - see **Section 4.4**
- Presenting this information is in accordance with 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'.

4.1 Defining growth scenarios

4.6 In order to define reasonable growth scenarios for Camden, it is first necessary to explore and understand the overarching ‘top down’ strategic factors (in terms of quantum and spatial distribution) that could have a bearing on growth scenarios. In addition to this, it is also necessary to take a ‘bottom up’ approach and consider the individual site options available, which are the key building blocks for any growth scenario. Finally, taking into account strategic factors and available site options, it is also reasonable to take an area-based approach and explore growth options for sub-areas in Camden.

4.7 The process taken to define reasonable alternative growth scenarios in Camden (which are then appraised in Section 4.3) is illustrated below.

Figure 4.1: Defining growth reasonable scenarios



4.8 This section of the report is structured in line with the above flow diagram, whereby:

- **Section 4.1.1** – explores factors with a bearing on growth scenarios
- **Section 4.1.2** – considers individual site options, as the key ‘building blocks’
- **Section 4.1.3** – explores options and growth scenarios for sub-areas.
- **Section 4.2** – draws upon the preceding sections to define reasonable growth scenarios.

4.1.1 Strategic factors

4.9 This section of the report explores strategic issues and options that have a bearing on the definition of reasonable growth scenarios in Camden. 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 new homes and jobs can be delivered in the borough and whether there are some areas in the borough that are better able to accommodate growth than others, taking into account planning considerations?

Quantum – Housing

4.10 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.”

4.11 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).

4.12 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.

4.13 The London Plan ([Policy H1](#)) sets a target for an additional 10,380 homes to be delivered in Camden over a ten year period from **2018/19 to 2028/29**. This equates to a need to deliver a minimum of 1,038 homes per year. Within Camden’s overall housing target there is also a target to deliver 3,280 homes on small sites.

4.14 The National Planning Policy Framework requires Local Plans to look forward over a 15 year period from the date of adoption. The new Camden Local Plan therefore covers the period to 2041. As the Plan period extends beyond that for which housing targets are set in the London Plan (2028/29), a housing requirement has been set for the whole Plan period having regard to paragraph 4.1.11 of the London Plan, which states that:

“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.”

4.15 The draft Camden Local Plan set a target to deliver 11,550 additional homes over the plan period to 2041. This factors in the London Plan housing target for Camden of 1,038 homes per year for the first three years of the Plan period (2026/27,

2027/28 and 2028/29) and also includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period).

- 4.16 The housing target in the draft Local Plan is a capacity-based target, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in a small sites windfall allowance and taking into account past under-delivery. The target also reflects the uncertainty and delay in development at Euston, related to HS2.
- 4.17 The housing target in the draft Local Plan is lower than the existing housing target for Camden in the London Plan, which if rolled forward, would equate to delivering 15,570 additional homes over the plan period (a difference of 4,020 homes). Whilst a number of London boroughs have taken the decision to roll forward the London Plan ten-year housing targets in their Local Plans, in the absence of a new London Plan housing target the Council has opted for a capacity-based approach as, due to the limited availability of land in Camden, sufficient sites are not available to deliver the number of homes needed to meet the London Plan target if it was rolled forward.
- 4.18 The SA of the Regulation 18 draft Local Plan stated that whilst the London Plan 2021 housing target was clearly a strategic factor with a bearing on the definition of reasonable growth scenarios, paragraph 4.1.11 suggests that when planning for the period from 2029/30 it is appropriate for boroughs to take a 'bottom up' approach driven by available capacity, as opposed to seeking to provide for any particular 'top down' target, which is important in the context of Camden, where there is limited land available and capacity is therefore constrained.
- 4.19 The housing target in the Regulation 19 Local Plan Proposed Submission Draft remains unchanged from the Regulation 18 draft. It should, however, be noted that the imminent review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the target in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2027, which would mean Camden's new Local Plan housing target is only in place for a short period of time.
- 4.20 The Regulation 19 Local Plan has also been updated to make it clear that the housing target is a minimum, and the Plan aims to maximise housing supply, allowing for greater numbers of homes to be delivered as and when sites become available.

Quantum – Employment

- 4.21 The draft Camden Local Plan sets out the need for additional office floorspace across the Plan period to 2041, based on the findings of the Employment Needs Assessment (ENA) 2023. This need remains unchanged in the Regulation 19 Local Plan Proposed Submission Draft from the Regulation 18 draft.

4.22 The ENA considers: A) existing and committed supply, and B) forecast demand, before C) considering the balance between supply and demand ('gap analysis'), and then making recommendations for the Local Plan. The 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 from 2023 to 2041 is 406,359 sqm above the total existing stock. This need will primarily be 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 from 2023 to 2041 is 0.8 ha below the total existing stock. The ENA therefore recommends protecting remaining industrial land given limited or no potential to add to the existing stock.

4.23 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

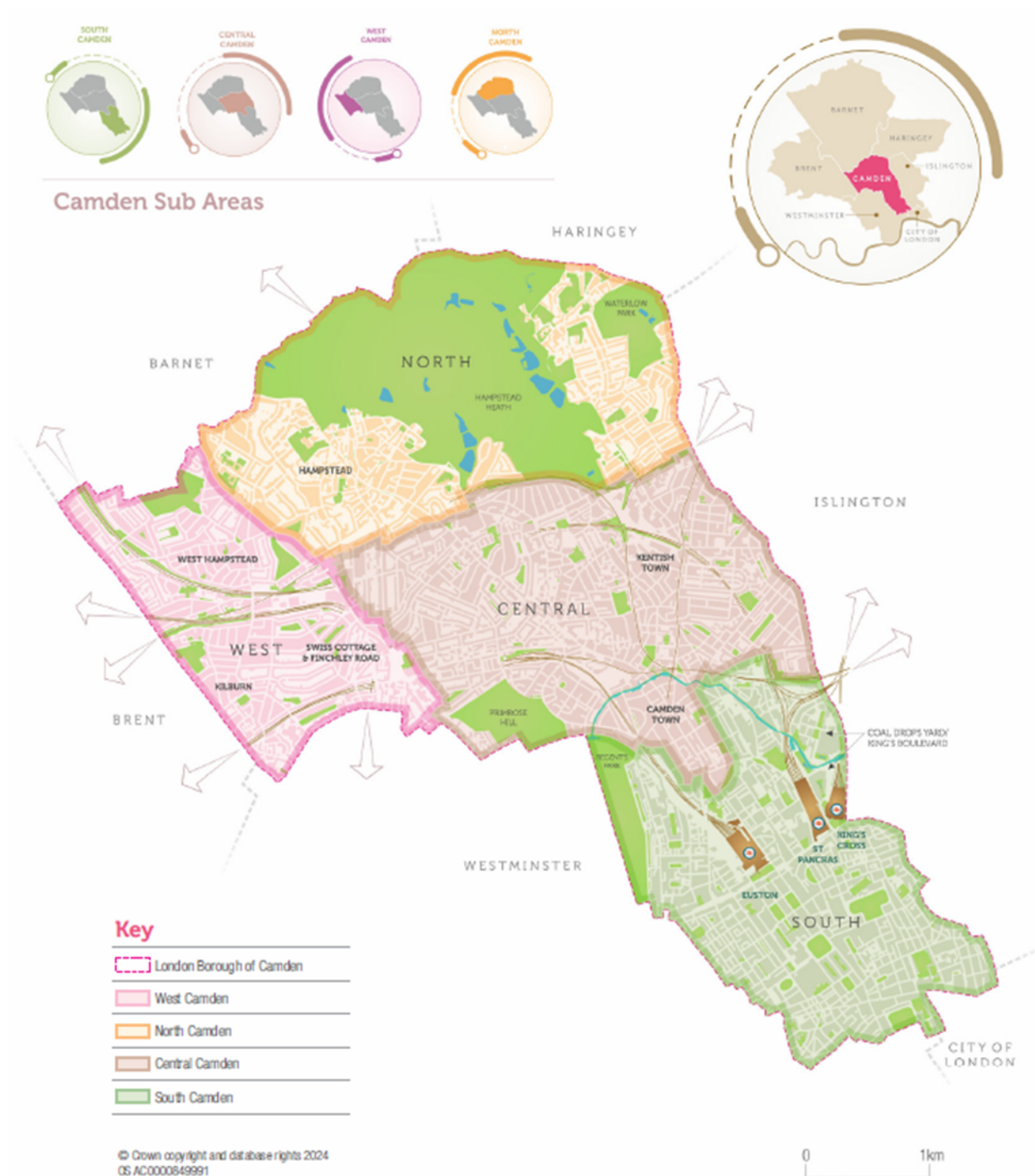
4.24 The other strategic factor with a bearing on the definition of reasonable alternative growth scenarios is distribution. This section gives high level consideration to:

- Broadly where in the borough there might be opportunities to deliver new development; and
- How sites might be developed to maximise housing and economic growth.

Broadly where in the Borough might there be opportunities to deliver new development?

4.25 The Local Plan takes an area-based approach focusing on four borough sub-areas: South Camden, Central Camden, West Camden and North Camden, as shown on the map below.

Figure 4.2: The Local Plan sub-areas



4.26 Whilst Camden is a highly accessible central London borough, there is limited land available to deliver new development. **North Camden** is characterised by 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** also has extensive conservation area coverage, and the one

strategic growth area (centered around the O2 site) is now permitted in its entirety (notwithstanding detailed applications to be submitted), meaning there is limited or no potential for further growth in this area. There are three town centres in West Camden (Kilburn, West Hampstead and Finchley Rd / Swiss Cottage), however none present any real growth opportunity (over-and-above that which is already permitted). Across both areas there are only a small number of available sites for development, and these are modest in size and not associated with a clear strategic choice with respect to an approach to growth.

4.27 Given this, the main opportunity to deliver new development is predominantly within the central and south sub-areas of the borough.

4.28 **Central Camden** includes two key areas of consideration, namely Camden Town and Kentish Town. With regards to Camden Town, there is an important cluster of development site options in the area known as the Camden Goods Yard; however key sites here are now permitted, meaning that limited additional growth opportunity remains. With regards to Kentish Town, which includes the borough's only designated Industry Area, there is a need to plan for the future of two large sites - Regis Road and the Murphy site. Whilst neither site has planning permission, a clear preferred approach to the redevelopment of this area is set out in the current Local Plan 2017 (in Policy G1 and paragraphs 2.32 – 2.36). Further guidance is also provided in the Kentish Town Planning Framework SPD (2020); the Regis Road Area Guidance (2024) which has been prepared as an addendum to the Kentish Town Planning Framework; and the Kentish Town Neighbourhood Plan.

4.29 **South Camden** comprises three key areas of consideration:

- **King's Cross and Euston** – development at King's Cross is largely complete meaning there is little or no potential opportunity for further growth in this area. Major development is expected to come forward at Euston, guided by the Euston Area Plan, however this is likely to be at the end of the Local Plan period and will continue beyond this date. King's Cross and Euston are at the centre of the Knowledge Quarter, which is an internationally significant innovation district, harnessing collaboration between private sector companies, universities, hospitals and research establishments in fields such as medical and life sciences, data analytics and machine learning.
- **Camley Street and St Pancras Way** – given its location adjacent to King's Cross and the fact that the area includes low density employment land, this area presents significant development opportunity. Sites here generally do not have planning permission, although the current Local Plan 2017 (paragraphs 2.68 – 2.71), the Canalside to Camley Street SPD 2021 and the Camley Street Neighbourhood Plan 2021 set 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 is 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 a 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 new Local Plan extends its geographical coverage to cover the entire South Camden area.

Broadly how could sites be developed with a view to maximizing housing and economic growth?

New Homes

4.30 Delivering new homes is a priority for the Council and, to this end, self-contained housing is the priority land use in both the existing and new Local Plan. However, there are a number of challenges to delivering new homes in Camden including:

- Developers have little interest in building homes even though it is the use with the greatest need.
- Investors targeting life science, student housing (despite possible restrictions on foreign students), and hotels, which have high returns on investment.
- Limited availability of land.
- High existing use values and build costs relative to sales values.
- Complex land ownerships.
- Camden's position in the Central Activities Zone (CAZ), where the priority in the London Plan is to deliver CAZ uses (over housing).
- The character of the borough – including many heritage designations and viewing corridors.
- Registered providers scaling back their new build programmes to focus on improving existing stock.

4.31 There are, however, opportunities for increasing housing delivery, through various policy interventions, and these are discussed below.

4.32 **Mixed Use Schemes** - Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) is a key policy in the adopted Local Plan aimed at maximising housing supply (including affordable housing). It applies in 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 the approach in Policy H2 into the new Local Plan, and extend the area to which it applies to cover all of South Camden. This could, however, have an impact on viability and in turn the supply of office floorspace, recognising the

demand for office and lab space in Camden given its location in the CAZ and Knowledge Quarter.

4.33 **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 and there is strong demand for hybrid spaces and labs to support science-based and research activities. However, since the Covid-19 pandemic 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 a greener and more sustainable future, there is an onus on landowners to upgrade (even relatively recently built) office buildings to meet tighter energy efficiency requirements (EPCs). 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. Furthermore, the conversion of large office buildings may in some cases provide an opportunity to deliver smaller, more affordable, flexible accommodation for start-ups and SMEs.

4.34 Given Camden’s position in the CAZ and Knowledge Quarter, there is a clear case for retaining office floorspace where it can continue to meet an economic need, whilst providing flexibility for conversion to deliver new homes where appropriate. To this end the ENA (2023) calls for *“a flexible approach that considers the merits of each individual site and which use they are best suited for”*.

4.35 **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. 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 and many of the industrial sites are small, with some having lost industrial capacity over the last decade.

4.36 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 Market 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."

4.37 There are clearly opportunities for some industrial sites to be used more intensively to support the delivery of new homes, jobs and other community benefits. Sites at Camley Street, and Regis Road and Murphy in Kentish Town represent the main development opportunities, and work has been undertaken over many years, in dialogue with the local community, to explore how development here could be taken forward. There is a need for the development of these sites to be "employment-led" to ensure the intensification of employment uses on these sites in line with the London Plan. However, within this there remain strategic choices to be made through the Local Plan, in respect of the quantum and mix of uses to be delivered on these sites and the contribution they can make to overall housing supply.

4.38 **Town centres** – town centres are usually highly accessible locations (especially in London), meaning they warrant consideration as potential growth locations. Camden has six town centres: Hampstead, Kentish Town, Camden Town, West Hampstead, Swiss Cottage / Finchley Rd, Kilburn High Rd. These 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, providing places where people can meet and interact. Traditional retail-based centres face a number of challenges 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 the Camden Retail Survey showing vacancies not substantially decreasing between 2019 and 2024, with the overall vacancy rate being lower than the London and National average. Development opportunities in Camden's town centres are limited, with many sites, like Hawley Wharf in Camden Town, having already been developed. Given this, it is considered that the delivery of substantial new development in any of Camden's town centres is not a reasonable option to explore.

4.39 **Housing type and mix** – the Council aims to achieve mixed and inclusive communities by seeking a range of housing types suitable for households and individuals. The new Local Plan supports the delivery of a variety of housing types, including: affordable housing; Build to Rent housing; housing for older people, homeless people and other people with support requirements; purpose-built student housing; Gypsy and Traveller accommodation; shared housing; and self-build housing. It also sets out clear policy to support both large and small homes (Policy H7) and a good housing mix (Policy H6). In light of this, it is difficult to envisage a strategic choice for the Local Plan; rather, there is a clear need to take a site-by-site approach that responds to local need and context.

4.40 **Other land uses** – there is a clear need to balance the mix of uses within areas, sites and individual buildings, and this is a consideration that extends beyond balancing the need for 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; and 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; rather, there is a clear need to take a site-by-site approach that responds to local need and context. It should, however, be noted that the Local Plan supports the delivery of affordable housing where it can be demonstrated that a social or community use is no longer required or viable.

4.41 **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 (for example, heritage constraints, protected views etc), high level impact testing of tall building locations and advice on parameters for appropriate building heights. The study identified a number of locations in Camden where tall buildings may be an appropriate form of development and set out indicative height ranges to guide development coming forward in those locations. Given the findings of the study and the character of Camden, including its many heritage designations, identifying further sites for tall buildings, or proposing taller building heights, is not considered to be a reasonable option to explore when looking at measures for increasing housing supply.

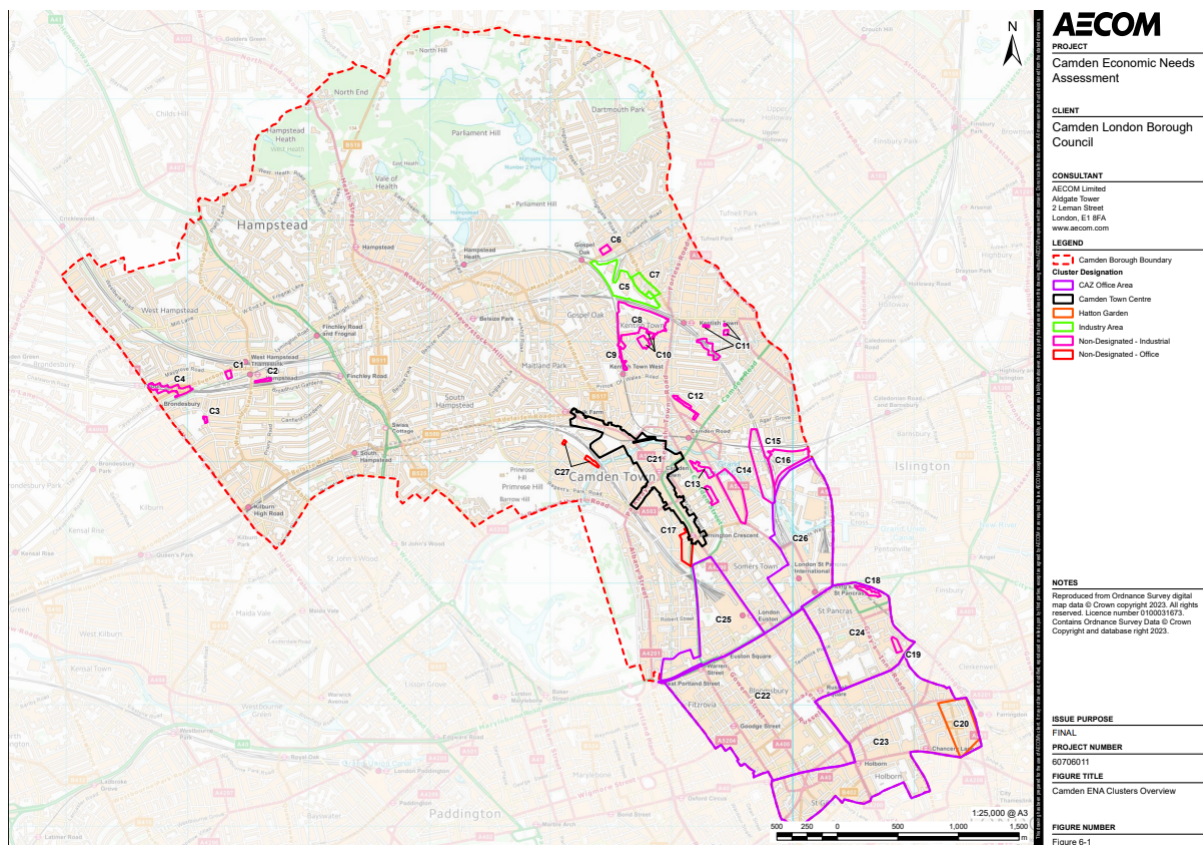
New Jobs

4.42 Camden has concentrations of high performing growth sectors, a significant research base and is home to a variety of national institutions. Local strengths include the numbers of businesses engaged in technology and science, clusters of medical and educational uses, legal services, consultancy and a wide range of creative industries. The vibrant social mix and creative spirit make the borough an attractive environment in which to invest. Furthermore, multiple public and private organisations have committed to work together to promote and grow the Knowledge Quarter centred on King's Cross and Euston, recognising it has become an internationally significant cluster of knowledge and research-based activity. The southern part of Camden is also within the Central London Activities Zone and the London Plan is clear that development in this area should support the role and function of the CAZ, as a nationally and internationally significant business location.

4.43 Figure 4.3 shows the main strategic employment areas in Camden. This highlights that key employment clusters in Camden are:

- The CAZ, which has six distinct office areas (including King's Cross and Euston) plus Hatton Garden
- Camden Town, which has a unique employment offer in the Borough
- The Murphy Site (Industry Area, equivalent to Locally Significant Industrial Site designation) and Regis Road at Kentish Town
- Industrial areas at St Pancras Way and Camley Street, adjacent to King's Cross.
- Freight Lane and the safeguarded aggregates area on York Way, King's Cross.

Figure 4.3: Strategic employment areas



4.44 In 2022, Camden had the third highest number of jobs of any local authority area in London (not including the self-employed), at 402,000 (nearly double the number of residents), demonstrating the Borough's importance to London's economy. Given this and the high level of economic investment in the Borough, the economy policies in the new Local Plan aim to maximise opportunities for residents, businesses and the voluntary sector to contribute to and share in Camden's economic growth.

4.45 The policies in the Local Plan seek to ensure a continuing supply of office, industrial and warehousing land and premises to deliver growth and innovation while securing

beneficial social, economic and environmental outcomes (Policy IE1 Growing a Successful and Inclusive Economy, Policy IE2 Offices, and Policy IE3 Industry). In particular, the Local Plan seeks to improve access to a greater supply of affordable workspace, recognising its role in developing a more resilient economy based upon a range of business sizes and types, including start-ups and emerging enterprises (Policy IE4 Affordable Workspace). Allocated sites suitable for additional workspace are also identified in the Local Plan, including sites that can be intensified. Camden is an attractive place for business investment for multiple reasons including the borough's transport connections and quality of the public realm. The Local Plan's area policies and the Council's Infrastructure Delivery Plan identify the main infrastructure commitments and plans, many of which will help to support the growth of businesses and social enterprises.

Conclusion on broad distribution

4.46 This section has sought to introduce and explore the strategic issues and options that have a bearing on the definition of reasonable growth scenarios in Camden. Specifically, quantum and distribution. Key messages include:

- Options for delivering new development are inherently limited in Camden given the limited availability of developable land; the densely developed nature of the borough; heritage, open space and other designations; and the need to balance competing land use priorities. Furthermore, many key sites already have planning permission and, while planning applications can be revisited, it is rarely appropriate to assume that this will occur.
- Options for maximising housing and economic growth in Camden relate to questions around *how* development is brought forward more so than *where* development is brought forwards. There are key development opportunities around the Kentish Town and the Camley Street areas, which provide the potential to deliver new homes and jobs through the employment-led intensification of industrial sites, and offer choices to explore through the Local Plan in relation to maximising housing and economic growth.

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

4.1.2 Site options

4.48 This section introduces the site options that are proposed for allocation in the Local Plan, with the aim of taking a 'bottom up' approach to defining reasonable alternative growth scenarios, based on the individual site options available, as these are the key building blocks for growth.

Identifying and sifting site options

Draft Site Allocations Local Plan

4.49 The process of identifying site options began in 2018 with site options identified from existing and emerging plans (including the Site Allocations Plan 2013, Fitzrovia Area Action Plan and Neighbourhood Plans); the London Strategic Housing Land Availability Assessment 2017; planning applications; and a Call for Sites. In total around 200 sites were identified.

4.50 The sites identified were then subject to a staged sifting process. This involved:

- Stage 1 – Site eligibility check. Key considerations here included: will the site deliver 10 or more homes or additional 1,000 sqm floorspace? is construction advanced? is the site within the borough?
- Stage 2 - Basic site suitability and high level availability check. Key considerations here included: will the site be available for development within the plan period? are there any policies or designations that would prevent the site from being developed?
- Stage 3 - Detailed site suitability and sustainability check. Key considerations here included: is the site suitable for the development proposed? what are the main issues and opportunities? is there a need for guidance to ensure the site helps to address local needs and priorities? and initial appraisal against the objectives in the SA Framework.
- Stage 4 - Achievability check. Key considerations included: are developers interested in developing the site within the plan period?

4.51 All potential sites that passed Stage 3 of the assessment process detailed above were considered to be suitable for redevelopment and taken forward to Stage 4.

4.52 To establish the uses that might be suitable for each of the preferred sites, officers went through a systematic process of defining and applying a set of 'rules'. These are set out below:

- A site is potentially suitable for residential development unless there are potential issues around amenity
- A site is potentially suitable for employment development where it is in an employment area or in a town centre
- A site is suitable for town centre uses if it is within a designated centre.

4.53 Applying these rules led to the identification of potentially suitable uses for each of the preferred sites. Where sites were identified as being potentially suitable for housing, the capacity of these sites was then assessed. Housing capacities were identified based on adopted area frameworks, neighbourhood plan policies, existing

planning permissions and site capacity design work, which has been undertaken in line with London Plan guidance and tested policy compliant mixes.

- 4.54 Where site capacity design work has been undertaken, the starting point for this work has been to model a scheme that is based on the retention and extension of the existing building, rather than to assume that the existing building will be demolished (either in part or in full), in accordance with Policy CC2 The Retention of Existing Buildings. However, where a demolition scheme would clearly constitute the best use of a site and would significantly increase capacity then a pragmatic approach has been taken and a scheme involving demolition has been modelled to ensure site capacity is optimised.
- 4.55 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). Other sites were discounted for clear reasons as set out in Appendix 5 of this SA report and are not considered to represent reasonable alternatives.
- 4.56 As part of the consultation on the draft Site Allocations Local Plan a further call for sites took place from February to March 2020 and five additional sites were submitted in response to this.
- 4.57 An additional consultation on the draft Site Allocations Local Plan was also held in 2021/22, together with an additional call for sites. Two additional sites were submitted at this stage for consideration.
- 4.58 These additional sites were subject to the same assessment process as other sites, as set out above, to identify whether they were suitable, available and achievable. Of these seven sites, five were discounted for clear cut reasons (see Appendix 5) and two sites were considered as being suitable for allocation (one site (11 Blackburn Rd) as a new site allocation and the other site (14 Blackburn Rd) as an extension to the existing O2 site allocation. These sites were taken forward as part of the preparation of the draft Local Plan (see below).

Draft Local Plan

- 4.59 The decision was taken in 2022 to begin a review of the Local Plan 2017 and to incorporate the site allocations from the draft Site Allocations Local Plan into the new Plan, with the aim of taking a more holistic and place-based approach.
- 4.60 Subsequently, another call for sites was held from November 2022 to January 2023, alongside a wider 'Call for Views' to inform the development of the new Local Plan. In total 17 sites were submitted for consideration: four new sites (that had not been previously considered); five sites that had been previously considered or submitted through earlier calls for sites; and eight sites that were allocated in the draft Site Allocations Local Plan (see above).

- 4.61 The four new sites submitted through this call for sites were subject to the same assessment process as other sites, as set out above, to identify whether they were suitable, available and achievable and all were discounted for clear cut reasons (see Appendix 5) and are not considered to represent reasonable alternatives. It should however be noted that 160 Malden Road has subsequently gained planning permission for 15 homes, so this has now been included as a site allocation in the Plan (see below).
- 4.62 The thirteen other sites, that had all previously been considered, were then reviewed. Two of these sites were allocated as extensions to existing sites: namely the Bangor Wharf site allocation was extended to include Eagle Wharf and the Regis Rd site allocation was extended to include Holmes Rd depot.
- 4.63 As part of the preparation of the draft new Local Plan, a number of changes were made to the proposed site allocations, as set out in the draft Site Allocations Local Plan 2020 including:
- Sites were removed (i.e. no longer proposed as allocations) where they were: substantially under construction; complete; or no longer expected to come forward over the Plan period.
 - Some allocations were amended to include adjacent sites.
 - New sites were included as allocations.
 - The proposed capacity and use of sites was 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-based capacity work.
 - The planning status of sites was updated where appropriate.
- 4.64 As part of the preparation of the draft new Local Plan, the capacity and mix of uses for the proposed site allocations was also reviewed, and updated where necessary.
- 4.65 This resulted in 21 sites previously allocated in the draft Site Allocations Local Plan being removed; 3 sites being extended; and 5 new sites being allocated. Of these 5 sites, 4 have planning permission.
- 4.66 The draft Local Plan (2024) therefore included 72 site allocations and was published for public consultation and engagement from January to March 2024.

Camden Local Plan Proposed Submission Draft

- 4.67 Nine additional sites were submitted for consideration in response to consultation on the draft new Local Plan (Regulation 18). These were subject to the same assessment process as previous sites, as set out above, to identify whether they were suitable, available and achievable. This resulted in three sites being assessed

as being suitable for allocation, and the rest of the sites being ruled out for clear reasons, as set out in Appendix 5.

4.68 In finalising the Local Plan (Regulation 19 version) all the site allocations have been reviewed and updated. As a result: seven sites previously allocated in the draft new Local Plan (Regulation 18) have been removed due to the fact that they are completed or significantly under construction; and five new sites have been added, one of which has planning permission (160 Maldon Rd). In total, the Local Plan Proposed Submission Draft (Regulation 19 version), therefore, includes 70 site allocations.

Gypsy and Traveller Site Options

4.69 To inform the preparation of the new Local Plan a call for Gypsy and Traveller accommodation sites was held in Winter 2022/23. Previous calls for sites were also undertaken as part of the consultation on the draft Site Allocations Local Plan in 2020 and 2021/22. No sites for Gypsy and Traveller accommodation were submitted to the Council during any of these call for sites.

4.70 In 2023 the Council commissioned Aecom to undertake a Gypsy and Traveller Site Identification Study to identify Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.

4.71 Aecom undertook a high level sifting exercise using GIS, assessing 2,821 Council freehold sites and 243 leasehold sites, based on agreed policy criteria and available mapped constraints.

4.72 This resulted in a shortlist of 18 parcels of land that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council.

4.73 Further assessment of the 18 parcels of land identified found that:

- 7 parcels were unavailable as they had either been sold, are leased by the Council to tenants (on long leases) or are subject to re-development plans; and
- 9 parcels were unsuitable due to access constraints, an unacceptable degree of overlooking, sites being used as amenity space / space for food growing, loss of parking, and loss of servicing for retail units.

4.74 These sites have therefore been discounted and are not considered to be reasonable alternatives (see Appendix 5). The remaining two parcels of land have been subject to SA.

4.75 The two remaining sites have been allocated in the Local Plan (Regulation 19 version) as sites for Gypsy and Traveller accommodation.

Site capacity and mix of uses

- 4.76 Sites are predominantly allocated for mixed use development in the Local Plan, reflecting the nature and location of the proposed site allocations, particularly those located within the Central Activities Zone and Knowledge Quarter.
- 4.77 Where sites are identified as being suitable for housing, then indicative housing capacities have been identified. Housing capacities have been identified based on adopted area frameworks, neighbourhood plan policies, existing planning permissions and site capacity design work, which has been undertaken in line with London Plan guidance and tested policy compliant mixes.
- 4.78 Where site capacity design work has been undertaken, the starting point for this work has been to model a scheme that is based on the retention and extension of the existing building, rather than to assume that the existing building will be demolished (either in part or in full), in accordance with Policy CC2 The Retention of Existing Buildings (see Chapter 8 of the draft Local Plan). However, where a demolition scheme would clearly constitute the best use of a site and would significantly increase capacity then a pragmatic approach has been taken and a scheme involving demolition has been modelled to ensure site capacity is optimised.

Summary

- 4.79 Work has been undertaken over a number of years, which has led to the identification of 70 sites for allocation in the new Local Plan. There are not considered to be any reasonable alternatives to increasing housing supply and delivering economic growth involving the allocation of additional sites. All sites not proposed for allocation are discounted for clear reasons.
- 4.80 Many of the proposed allocations have planning permission, and hence need not be a focus of further consideration. Whilst planning permissions can be, and sometimes are revisited, it is reasonable to focus attention on sites that do not have permission.
- 4.81 At all or most of the sites that do not have permission there is feasibly potential to consider varying the preferred/assumed capacity and or use mix, and this is considered further below. However, overall, there is limited potential to deliver growth over and above the emerging proposed approach, which reflects work over a number of years accounting for well-established policy and site-specific factors.

4.1.3 Sub areas

- 4.82 This chapter has so far focused on A) 'top down' considerations with a bearing on reasonable growth scenarios; and B) the 'bottom-up' consideration of site options. The next step is therefore to explore growth options for each of Camden's sub-areas: South Camden, Central Camden, West Camden and North Camden.

4.83 Each of the sub-areas are considered in turn below. The two sub-areas with the least potential to deliver significant growth are considered first (namely North and West Camden), followed by Central and South Camden, where there are more opportunities for consideration.

North

4.84 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.

4.85 Hampstead is the only town centre in the north of the borough, 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.

4.86 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. As a result, only three sites have been allocated in the new Local Plan to deliver new development in this area.

4.87 Queen Mary's House (site N3) and Hampstead Delivery Office (N4) are located to the west of Hampstead Heath, within conservation areas. Both sites are allocated to deliver new homes - 98 additional homes at Queen Mary's House and 45 additional homes at Hamstead Delivery Office. Neither site has planning permission. Given the constraints that exist on these sites, in terms of heritage and potential impact on amenity, there is limited scope to deliver further development.

4.88 The Former Mansfield Bowling Club (N2) lies to the east of Hampstead Heath and has planning permission to deliver 23 new homes, a new public space, enhanced tennis facilities and an ancillary sports pavilion (2018/1701/P). A subsequent planning application (2022/5320/P) has also since been submitted for a residential care home, open space and three tennis courts. The proposed site allocation supports a housing-led scheme in line with the planning permission, with an indicative capacity of 23 homes. The site is also located in a conservation area and part is designated as private open space and Local Green Space, which serves to limit options to deliver further development here.

4.89 In conclusion, there are no reasonable alternative growth scenarios in this area.

Figure 4.4: Sites proposed for allocation in the North sub-area



West

4.90 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.

4.91 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. The 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.

- 4.92 The new 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.
- 4.93 The most significant opportunity to deliver new homes, jobs and infrastructure in this area is on the site formed of the O2 Centre, associated car parking, other retail uses and 14 Blackburn Road (site W2). This site already has planning permission to 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. The Fortune Green and West Hampstead Neighbourhood Plan also sets out the community's vision and objectives for the area. Given the site already benefits from planning permission, for high density re-development, there is little scope to deliver further development here.
- 4.94 Adjacent to the O2 Centre site are 11 Blackburn Road (W3) and 13 Blackburn Rd (W4). These sites are identified in the Fortune Green and West Hampstead Neighbourhood Plan as being part of the West Hampstead Growth Area, and potential development sites. Objectives to guide the development of these sites is set out in the Neighbourhood Plan and the Council's adopted West End Lane to Finchley Road Supplementary Planning Document (2021). Both sites have planning permission to deliver mixed-use schemes comprising permanent self-contained homes and employment and are both allocated in the new Local Plan to deliver 24 additional homes, in addition to employment floorspace. Given that we expect the permitted schemes to be implemented and that these schemes already optimise capacity on the sites, there is no scope to deliver further development here.
- 4.95 A short distance to the west is 188 - 190 Iverson Rd (W5), which is an industrial site proposed for offices, light industrial and 17 additional homes. This is a small site (0.26 ha) and given its existing use, the re-provision of employment floorspace is a priority objective. Given this, and an adjacent SINC, there is limited scope to deliver additional development.
- 4.96 To the east, on the Finchley Road is Meridian House (W6). This site is adjacent to Swiss Cottage / Finchley Road town centre and the Redington Frogna Conservation Area. The site is allocated for the delivery of 15 additional homes 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 and would need to be justified in accordance with emerging Policy CC2 (Retention of Existing Buildings). Whilst the site does not have planning permission, there is little or no potential to deliver additional development, unless the whole site was to come forward for comprehensive development, however there is no evidence that the remainder of the site will become available for development.

- 4.97 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 site is allocated for the delivery of 30 additional homes and / or a specialist care home. Given this is a unique site comprising a decommissioned reservoir and Grade II SINC there is considered to be no potential to deliver additional development here.
- 4.98 To the south lies the Abbey Co-Op site (W11). The majority of this estate regeneration scheme has been delivered, with works now started on the final phase. There are also five sites located on the eastern side of Finchley Road, within or close to the town centre: Land at Midland Crescent / Finchley Road (W9), 104A Finchley Road (W10), 100 Avenue Road (W12), 551-557 Finchley Road (W13), and 317 Finchley Road (W14). These sites all have planning permission. Given that we expect the permitted schemes to be implemented and that these schemes already optimise capacity on these sites, there is no scope to deliver further development here.
- 4.99 Since the SA was undertaken of the Regulation 18 draft new Local Plan, one site in the west area has been completed (Liddell Road Industrial Estate) and has therefore not been included in the Regulation 19 Local Plan. Furthermore, a new site has been allocated in this area in the Regulation 19 Local Plan: 88 – 92 Kilburn High Road (W8). This site is within Kilburn town centre and is currently in use as a Sainsburys'. The site is allocated in the new Local Plan to deliver 21 additional homes and retail (Class E). Given the location of this site and the need to ensure an on-going retail presence, there is little or no potential to deliver additional development here.
- 4.100 In conclusion, there are no reasonable alternative growth scenarios in this area.

Figure 4.5: Sites proposed for allocation in the West sub-area



Central

4.101 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.

- 4.102 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 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 land in Kentish Town. The Murphy site and the concentration of small and medium sized enterprises located within premises close to the Highgate Road form part of the designated Industry Area. Regis Road is identified in the Local Plan 2017 as a growth area is in predominantly industrial use.
- 4.103 The two main areas of opportunity for delivering growth are around Camden Goods Yard and Kentish Town; however there are also smaller development sites in this area, which offer the opportunity to deliver new homes and jobs. These opportunities are discussed below.

Camden Goods Yard

- 4.104 The Camden Goods Yard area is situated on the edge of Camden Town town centre. It is envisaged that approximately 1,200 new homes will be delivered here over the plan period. It 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.
- 4.105 The Camden Goods Yard area comprises six sites: Morrisons Supermarket (site C7); Former Morrisons Petrol Filling Station (C8); 100 Chalk Farm Road (C9); Juniper Crescent (C10); Network Rail land at Juniper Crescent (C11); and Gilbeys Yard (C12). These are discussed in turn below.
- 4.106 The main components of the Camden Goods Yard area are the Morrisons Supermarket site (C7) and the former Morrisons Petrol Filling Station (C8). These sites are both covered by the same planning permission (ref. 2022/3646/P) and together will deliver 644 additional homes, employment floorspace, retail, food and drink, and community and leisure uses. Both sites are now under construction and given this, there is no scope to deliver further development here.
- 4.107 The second largest component of the Camden Goods Yard cluster is Juniper Crescent (C10), a Council housing estate. Whilst this site does not have planning permission, residents have [voted](#) in favour of the redevelopment of the site to deliver an additional 375 homes. Gilbeys Yard (C12) is also a housing estate and One Housing Group has been leading a consultation and engagement exercise with the residents about improving the standard of existing homes on the estate. A number of options are being considered, including the full redevelopment of the estate providing replacement accommodation and additional homes. As a pre-condition for funding support from the Mayor of London, housing regeneration schemes are subject to a ballot of residents. A ballot held in 2020 was unsuccessful and residents have not been balloted again to date. In the event that a ballot is successful, a housing-led

development that delivers significant regeneration benefits for the estate and the wider Camden Goods Yard area would be supported. The site is allocated in the draft Local Plan to deliver an additional 120 homes. Given the nature of these sites and the fact that they will need to be taken forward in a sensitive manner in dialogue with existing residents, there is considered to be no scope to deliver further development at these locations.

- 4.108 To the north of Juniper Crescent lies the Network rail land at Juniper Crescent (C11). This site does not have planning permission and is allocated to deliver 55 additional homes, employment and operational railway use. The site is located at the intersection of two railway lines, and access is challenging given the railway lines and the adjacent Juniper Crescent estate. The site is also currently safeguarded to support High Speed 2 construction works and provides an operational access point to the railway. Given this, options for delivering further development here are limited.
- 4.109 100 Chalk Farm Road (C9) is situated on the other side of the railway to the majority of the sites in this cluster, adjacent to the former Morrisons Petrol Filling Station. Since the SA of the Regulation 18 Local Plan was undertaken this site has been granted planning permission to deliver 30 additional self-contained homes and 264 student units. Given that we expect the permitted scheme to be implemented and that this scheme already optimises capacity, there is no scope to deliver further development here.

Kentish Town

- 4.110 Development in Kentish Town will mainly be delivered through site allocations at Regis Road and Holmes Road Depot (C2) and the Murphy Site (C3), however neither site has planning permission. These sites are together expected to deliver approximately 1,750 new homes, in line with the Kentish Town Planning Framework and the Regis Road Area Guidance, which has been prepared by the Council as an addendum to the Planning Framework.
- 4.111 The Kentish Town Neighbourhood Plan identifies Regis Road as a potential area for mixed-use development. It sets out a number of criteria to guide development within the Regis Road site. The Plan notes that the site is currently underused and states that the intensification of the site through mixed-use development, including housing, industry, offices, start-ups, and other uses, is supported by the local community subject to consideration against relevant policies.
- 4.112 The Neighbourhood Plan also includes a policy on the future development of the Holmes Road depot site. The Council is progressing a regeneration strategy involving using Camden's land assets on Regis Road and Holmes Road as an enabler and catalyst for the regeneration that will bring forward the benefits envisaged in the Planning Framework and Neighbourhood Plan. The strategy's objectives include enabling re-provision of the Recycling Centre and other Council service provision as necessary, ensuring continuous operation.

- 4.113 The Murphy site forms part of the Kentish Town Industry Area, which is considered to be a Locally Significant Industrial Site (LSIS) in terms of the London Plan. Part of the site lies within the Dartmouth Park neighbourhood area and part lies within the Kentish Town neighbourhood area. The site is identified in the Kentish Town Neighbourhood Plan as being within the Kentish Town Potential Development Area. The Plan supports the mixed-use redevelopment of the site for housing, business and industrial uses. The Dartmouth Park Neighbourhood Plan identifies the site as providing an opportunity for development for a mix of residential and business/employment units, to enhance the area, and sets out aspirations for any development.
- 4.114 These existing employment sites are allocated for intensification 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. However, given the need for the development of these sites to be employment-led to ensure the intensification of employment uses on these sites in line with the London Plan, there are limited opportunities to provide additional housing on these sites, over and above what is planned. Furthermore, whilst both sites are identified as locations where tall buildings may be an appropriate form of development, there isn't further scope to deliver additional height, above the proposed potentially appropriate height range, given the presence of protected views. Given this, there is no scope to deliver further development on these sites.
- 4.115 Of the remaining four sites in this area, two have planning permission, namely 369 – 377 Kentish Town Road (C5) and the Highgate Centre (C19), leaving:
- Kentish Town Police Station (C4) – The site is allocated to deliver police facilities, 35 additional self-contained homes and student accommodation. The Metropolitan Police Service intend to retain the police use of the station and annex to meet operational requirements; however there is potential to make more efficient use of parts of the site, such as the yard / parking space and the Section House. The Council would also support the site being taken forward as part of the development of Regis Road if this enables a better solution to be found to meet the operational needs of the Police Service and support the delivery of the Regis Road masterplan. The site is not within a conservation area, but the Police Station is listed, which could limit the potential to deliver a higher density scheme.
 - Kentish Town Fire Station (C6) – This site provides an opportunity to deliver a replacement fire station to better meet the needs of the London Fire Brigade and introduce housing (30 additional homes are proposed) as an additional use to make more effective use of the site. Given this, a key consideration is the need to avoid conflict with the operational activities of the fire station, which will have implications for the number of homes that can be delivered. 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. Given this, there is no scope to deliver further development on the site.

Other development sites

4.116 Other development sites within the Central Area are considered below.

4.117 Three housing estates are identified for redevelopment in this area: West Kentish Town (C13); Wendling and St Stephens Close (C15); and Former flats 121 – 129 Bacton, Haverstock Road (C23). Ballots have been undertaken at West Kentish Town, and Wendling and St Stephens Close, and residents have voted in favour of redevelopment to deliver an additional 569 homes and 509 homes respectively. The Gospel Oak and Haverstock Community Vision, adopted by the Council in November 2022 as a Supplementary Planning Document, sets out the community's vision for the future of this area. The former flats at 121 - 129 Bacton, Haverstock Road already has planning permission, and phase 1 of this development is complete. Officers are aware that a new scheme is being consulted on for this site at this time, which proposes a higher number of new homes. Depending on the outcome of this process, the Plan may need to be updated through the examination process to reflect a potentially higher capacity on this site.

4.118 Then there are a number of sites with planning permission in the Central Area, including: Grand Union House, 18 –20 Kentish Town Road (C21); 52 - 54 Avenue Road (C24); and 5-17 Haverstock Hill (Eton garages) (C25). Given that we expect the permitted schemes to be implemented and that these schemes already optimise capacity on these sites, there is no scope to deliver further development here.

4.119 This leaves the following sites, that are not subject to planning permission:

- Shirley House, 25-27 Camden Road (C15) – This site comprises an office block in Camden Town located at the junction of two busy roads and within a conservation area. This site was allocated in the draft new Local Plan to deliver office floorspace and 30 new homes. The SA of the draft new Local Plan identified that “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”. The Regulation 19 Local Plan Proposed Submission draft allocates this site for 197 student units, based on the retention and extension of the existing building. Given this, there is considered to be no scope to deliver further development here.
- Arlington Road former depot site (C18) – This site was until recently used by Camden Council as offices and as a base for its street cleaning services. The site is allocated for permanent self-contained homes and student accommodation and employment uses, with an identified capacity of 63 additional homes. Given this size of the site (0.26 ha), there is considered to be limited scope to deliver further development here.

- Camden Town over-station development (C16) – This site is located in the very heart of Camden 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 employment, retail and food and drink uses. Given this, and the fact that 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, there is considered to be little scope to deliver further development here.
- UCL Camden Campus, 109 Camden Road (C17) – This site is proposed for student accommodation (180 units). Given the existing halls use, there is little evidence to suggest that the delivery of self-contained homes or employment floorspace are reasonable options to consider here. It is also noted that there are conservation areas adjacent to the site, which limit the opportunity for any further development.
- Heybridge Garages, Hadley Street (C21) – This site is part of the Council’s small sites programme and estimated to have capacity for just ten homes. Given this size of the site, there is considered to be limited scope to deliver further development here.

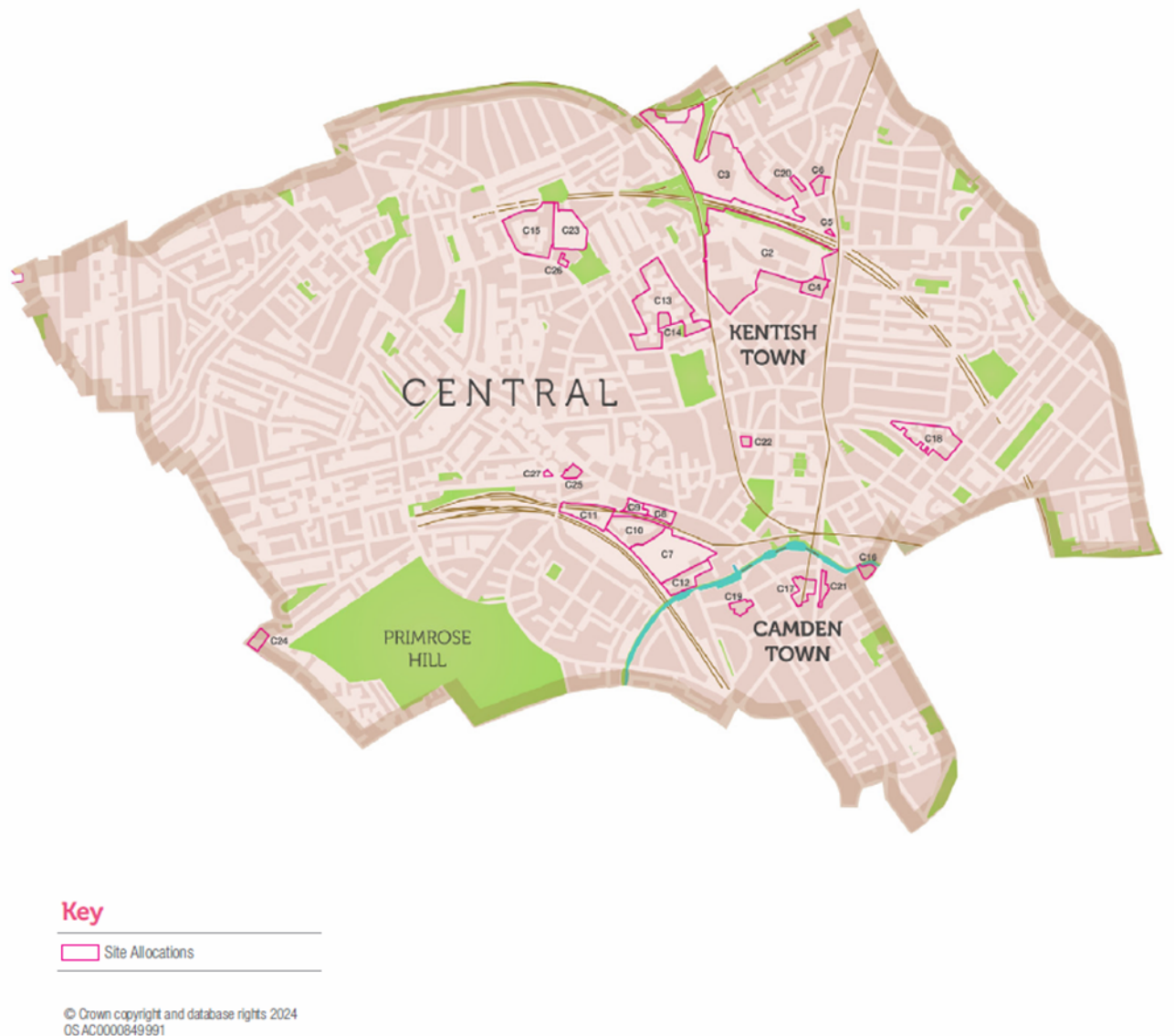
4.120 The Regulation 19 Local Plan Proposed Submission Draft also identifies two new sites in the Central Area, these are discussed below:

- Hawkridge House, Warden Rd (C14) – The site comprises 216 student units in a part 10, part 15 storey tower and 2 storey annex buildings. The buildings were most recently used as student accommodation for postgraduates of University College London, however they have been vacant since 2020. The site is adjacent to the West Kentish Town Estate (C13), which is identified for regeneration by the Council and also allocated in the Local Plan. The site is allocated to deliver an additional 19 student units based on the retention and extension of existing buildings. Where substantial demolition is proposed this would need to be justified in accordance with Policy CC2 (Retention of existing buildings).
- 160 Malden Rd (C26) – This site has planning permission to deliver 15 self-contained homes, with offices on the ground floor. Given that we expect the permitted scheme to be implemented and that this scheme already optimises site capacity, there is no scope to deliver further development here.

4.121 Since the SA was undertaken of the Regulation 18 draft new Local Plan, one site in this area has been completed (Former Charlie Ratchford Centre) and has therefore not been included in the Regulation 19 Local Plan Proposed Submission Draft. Furthermore, the land adjacent to Constable House, Adelaide Road (C27) has been allocated to deliver Gypsy and Traveller accommodation.

4.122 In conclusion, whilst this area presents a number of development opportunities, there are no reasonable alternative growth scenarios in this area.

Figure 4.6: Sites proposed for allocation in the Central sub-area



South

4.123 The South of the borough includes the neighbourhoods of Covent Garden, Holborn, Hatton Garden, Bloomsbury, Fitzrovia, Euston, Regent's Park, King's Cross and Somers Town.

4.124 At the heart of these neighbourhoods are strong and diverse residential communities. These form part of a dense mix of uses, which include renowned institutions such as the British Museum, British Library and University College London; the focus of London's legal profession within Holborn and the jewellery trade in Hatton Graden; the retail, leisure and cultural attractions of the West End

and Seven Dials; and the offices of major data science and life science businesses in the Knowledge Quarter.

- 4.125 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.
- 4.126 The main focus of development in this area over the last 10 years has been at King's Cross; however, development here is nearly complete. Major development is also planned at Euston and will be primarily guided by the Euston Area Plan; however, this is likely to come forward towards the end of the Plan period, with delivery projected to extend well beyond this date. A number of other locations in this area are also expected to deliver new homes, jobs and infrastructure to support Camden's communities. The most significant is at Camley Street, where there is opportunity for intensification and diversification to create a new neighbourhood, while ensuring the continued provision of employment uses in a way that makes the most effective and efficient use of the land available. Further development is also planned around Holborn, guided by the Council's Holborn Vision, and through the Council's Community Investment Programme. These opportunities are discussed below:

Euston

- 4.127 Euston is identified as an Opportunity Area in the London Plan 2021, with significant potential for intensification and an opportunity to comprehensively transform Euston Station and the immediate area into a world-class transport interchange and new residential and business district, delivering new homes and jobs, in addition to High Speed 2.
- 4.128 Development at Euston is expected to deliver between 1,500 and 2,500 new homes and sites are being allocated through the review of the Euston Area Plan (2015) to deliver this. These sites are however likely to come forward towards the end of the Local Plan period, meaning they will only make a limited contribution to housing delivery in Camden over the period to 2041, with over half of the housing planned at Euston expected to be delivered outside of the Plan period.
- 4.129 Development at Euston will be guided by the Euston Area Plan, which is subject to its own Sustainability Appraisal, meaning that it is not a matter that needs be considered here. The Local Plan Proposed Submission Draft does however include a new policy which sets out the Council's overarching approach to delivering development at Euston, and this is appraised in chapter 6 of this report.

Camley Street and St Pancras Way

4.130 Development in this area will mainly be delivered through site allocations at 120 - 136 Camley Street (S5) and 104 - 114 Camley Street and Cedar Way Industrial Estate (S6), which are expected to together deliver 860 new homes, although neither yet has planning permission. The Council's adopted Canalside to Camley Street Supplementary Planning Document envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance. Furthermore, the Camley Street Neighbourhood Plan recognises the potential for development on these sites and sets out a number of criteria to guide their redevelopment.

4.131 These existing employment sites are allocated for intensification to deliver new homes and employment uses including research and knowledge based uses, light industrial, maker spaces and offices. However, given the need for the development of these sites to be employment-led to ensure the intensification of employment uses on these sites in line with the London Plan, there are limited opportunities to provide additional housing on these sites, over and above what is planned. Furthermore, whilst both sites are identified as locations where tall buildings may be an appropriate form of development, there isn't further scope to deliver additional height, above the proposed potentially appropriate height range, given the presence of protected views, which limits opportunities for additional growth here. Given this, there is no scope to deliver further development.

4.132 Other key development opportunities in this area include:

- 24 - 86 Royal College Street (Parcelforce and former ATS Tyres) (S7) – This site is allocated to deliver 280 additional homes and employment uses. Planning permission for a health care facility was granted in February 2021 for 80 - 86 Royal College Street, the part of the site previously occupied by ATS tyres (2020/0728/P), which limits opportunities for further development here, given that we expect the existing planning permission to be implemented.
- St Pancras Hospital (S8) - Planning permission has been granted (2020/4825/P) on part of the site for a new purpose-built facility for Moorfields Eye Hospital, University College London and Moorfields Eye Charity, and this is under construction. The continued use of the site for health purposes is supported. The priority for the part of the site not occupied by health facilities is permanent self-contained homes, with the delivery of 200 new homes envisaged. Given this, and the fact that the site is within a conservation area, means there is no scope to deliver further development
- Shorebase Access (S9) – This is a small site, allocated to deliver 41 additional homes and offices. The site is within the King's Cross and St Pancras Conservation Areas and in close proximity to the Grade II* St Pancras Old Church and Grade II listed church gardens. Given this, there is no scope to deliver further development.
- Bangor Wharf and Eagle Wharf (S10) – This is a small site within the Regent's Canal conservation area, and is currently used for offices and storage. The site is proposed for 50 additional homes and employment use. 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 deliver additional development.

- 4.133 Other sites in the Camley Street and St Pancras Way area which already have planning permission and therefore offer no scope to provide additional development, given that we expect the permitted schemes to be implemented and that these schemes already optimise capacity on these sites, include Agar Grove Estate (S21) and 6 St Pancras Way (S22).
- 4.134 Since the SA of the Regulation 18 draft new Local Plan was undertaken, one site in this area has been completed (St. Pancras Commercial Centre, Pratt Street) and has therefore not been included in the Regulation 19 Local Plan Proposed Submission Draft. Furthermore, a new site has been allocated in this area – York Way Depot and adjacent land at Freight Lane (S20). This site is allocated to deliver 210 additional homes, employment use, Gypsy and Traveller accommodation, depot and bus operations / parking. Given the need to retain / reprovide the Council depot and bus depot on this site and to provide Gypsy and Traveller accommodation, there is no scope to deliver additional development here.

Holborn

- 4.135 Development around Holborn has the potential to strengthen the area's role as a location for business, supported by the enhanced access brought by the Elizabeth Line. It will create more vibrant and better-connected neighbourhoods in the heart of Central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and new self-contained homes. To guide the development of this area the Council has produced the Holborn Vision Supplementary Planning Document.
- 4.136 Six of the proposed site allocations in this area are now permitted, including: the Former Central St Martins College (S16), Tybalds Estate (S23), 294 - 295 High Holborn (S24), 156 - 164 Grays Inn Road (S25), 8 - 10 Southampton Row (S26), Selkirk House, 166 High Holborn, 1 Museum Street, 10 - 12 Museum Street, 35 - 41 New Oxford Street and 16a - 18 West Central Street (S17). Given that we expect the permitted schemes to be implemented and that these schemes already optimise capacity on these sites, there is no scope to deliver further development here.
- 4.137 With regards to sites without planning permission, 135-149 Shaftesbury Avenue (S18), which is allocated for a theatre, cinema or cultural use, in line with its former use as an Odeon cinema, given the need to protect existing cultural facilities, there is no scope to deliver additional development here and any housing delivered would be off-site, having regard to Policy H2 of the Local Plan. Cockpit Yard and Holborn Library, 32-38 Theobalds Road (S19) is a Council owned site which contains several buildings including Holborn Library, ground floor retail (40-46 Theobalds Road), a Council street cleaning depot, and workshops occupied by the Cockpits Arts

organisation. The site is allocated to deliver employment uses (including creative and maker spaces and affordable workspace), permanent self-contained homes, a library and depot. Given the constrained nature of the site, the need to reprovide existing uses, and the fact that the site is within a conservation area, there is no scope for further development to be delivered on this site.

4.138 Since the SA of the Regulation 18 draft new Local Plan was undertaken, four sites in this area have been completed (Network Building and Whitfield Street; Former Tottenham Mews Day Hospital; 60 – 67 Shorts Garden and 14 – 16 Betterton Street and 18 Vine Hill and 15-29 Eyre Street Hill) and have therefore not been included in the Regulation 19 Local Plan Proposed Submission Draft.

Other development sites

4.139 There is also a need to consider other development sites in this area. Several of these sites are now permitted, including: the Former Throat, Nose and Ear Hospital (S11), Belgrove House (S12), Land to the rear of the British Library (S15), Middlesex Hospital Annex (S27), Central Somers Town (S28) and Charlton Street, Godwin and Crowndale Estate (S29). Given that we expect the permitted schemes to be implemented and that these schemes already optimise capacity on these sites, there is no scope to deliver further development here.

4.140 Other allocations without planning permission in this area are considered below:

- Land at Packerham Street and Wren Street (S14) – This 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. The site was also identified in the Site Allocations Plan 2013 as a potential location for a new secondary school. However, the most recent pupil place projections for Camden indicate that there is no current need for a new secondary school in this location. The site is allocated to deliver intensified employment uses and 70 additional homes. Given the location of the site adjacent to the Bloomsbury Conservation Area and the presence of locally listed buildings on the site, there is limited scope to deliver additional development.
- Former Thameslink, Pentonville Road (S13) - This is a very small site situated on the Pentonville Rd, within the King's Cross Conservation Area. It is a complex site with nearby late night uses. The site is allocated to deliver employment uses and 12 additional homes (subject to the applicant being able to demonstrate the site is suitable for housing in terms of noise and air quality). Given this, there is no scope to deliver additional development here.
- Birkbeck College (S30), Senate House (NW quadrant) (S31), and 20 Russell Square (S32) – These sites are allocated in the Local Plan to deliver higher education in line with Policy S4 Bloomsbury Campus Area.

4.141 In conclusion, whilst this area presents a number of development opportunities, there are no reasonable alternative growth scenarios in this area.

Figure 4.7: Sites proposed for allocation in the South sub-area



Key

Site Allocations

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Conclusion on sub-areas

4.142 This section has given detailed consideration to site options by sub-area (informed by Sections 4.1.1 and 4.1.2). This has demonstrated that there is little or no opportunity to deliver further development in North and West Camden. In Central and South Camden, whilst a number of development opportunities exist, particularly around Kentish Town and Camley Street, it is very difficult to see how housing supply and economic growth could be further increased, due to the circumstances identified.

4.2 Reasonable growth scenarios

4.143 Taking into account the quantum and distribution of growth, and site options available for delivering growth, set out above, this section sets out reasonable growth scenarios for appraisal.

4.144 The emerging preferred approach seeks to maximise housing supply in Camden based on the delivery of available sites and aims to deliver a minimum of 11,550 additional homes over the plan period to 2041. This factors in the London Plan housing target for Camden of 1,038 homes per year for the first three years of the Plan period (2026/27, 2027/28 and 2028/29).

4.145 This housing requirement is a capacity-based figure, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in an allowance for unallocated small sites delivering under 10 additional homes (based on evidence of past delivery) and has been set having regard to 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.”

4.146 It should however be noted that the imminent review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the target that is in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2027, which would mean that Camden’s new Local Plan housing target would only be in place for a very short period of time.

4.147 The Local Plan sets out the need for additional office floorspace across the Plan period to 2041, based on the findings of the Employment Needs Assessment (ENA) 2023. The requirement for office floorspace from 2023 to 2041 is identified as being 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.

- 4.148 This chapter has so far focused on the emerging preferred option and whether opportunities exist for delivering higher levels of growth in Camden. However, in addition to these two options it is considered appropriate to also consider a lower growth scenario, whereby industrial land is protected (compared to the emerging proposed approach, which supports the intensification of industrial use allowing the co-location of housing).
- 4.149 As such, and on balance, it is proposed to appraise **three reasonable alternative growth scenarios**. These are presented in Table 4.1, with the appraisal set out in Section 4.3.

Table 4.1: The reasonable alternative growth scenarios

Scenario	Objectives
Lower growth	Under this scenario the housing requirement would be set at a figure around 1,000 homes lower than the emerging preferred option, so approximately 10,500 homes over the plan period, on the basis that a more protectionist approach is taken to industrial land, meaning there would be more limited potential to deliver new homes as part of the mixed-use redevelopment of the Murphy, Regis Road and Camley Street sites. This would also have implications for the delivery of employment land supply locally (as discussed in the appraisal in Section 4.3), and would result in lower levels of economic growth. Other than this, the spatial distribution of growth would be the same as the emerging preferred option.
The emerging preferred option	Under this scenario the housing requirement is set at 11,550 homes. Allocations would deliver the capacity figures discussed in Section 4.1.3, with the aim of aligning with the recommendations of the Employment Needs Assessment (ENA, 2023) in relation to the delivery of additional office floorspace.
Higher growth	Under this scenario 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). This would also have implications for employment land supply locally (as discussed in the appraisal in Section 4.3), and would result in lower levels of economic growth. Given that no reasonable alternatives have been identified in respect of the spatial distribution of growth, it is not possible to identify where new homes and jobs would be delivered under this scenario, relative to the emerging preferred option. On this basis it is considered that the spatial distribution of growth would be the same as the emerging preferred option.

4.150 Whilst these reasonable growth scenarios were identified as part of the preparation of the Regulation 18 draft Local Plan, they have been reviewed as part of the preparation of the Regulation 19 Local Plan Proposed Submission Draft. They are still considered to be reasonable alternatives, and no further reasonable alternatives have been identified.

A note on higher growth scenarios

4.151 It is recognised that there are further higher growth scenarios that might feasibly be considered. 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 around 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 $12,850 + 1,720 =$ approximately 14,600 homes.

4.152 Also, there is the theoretical possibility of 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.

4.153 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. However, this was discounted through the London Plan process, and is therefore not considered to be a reasonable alternative.

4.154 Also, there is a need to note the Government's standard method for calculating housing need (NPPF paragraph 61), which shows a housing need figure for Camden of 3,137 homes per annum. However, as London has a strategic planning tier, it is the London Plan, rather than the national standard method figures, that set the housing targets for London boroughs for planning purposes.

4.155 All the scenarios above have been discounted as reasonable options, for the following reasons:

- There is limited land available in Camden to deliver new development and all available sites have been identified and allocated in the Local Plan, meaning that higher levels of development cannot be accommodated in the borough;
- Camden has an important economic role at a London, national and international level, being both part of London's Central Activities Zone (CAZ) and home to the Knowledge Quarter, an internationally significant innovation district, harnessing collaboration between private sector companies, universities, hospitals and research establishments in fields such as medical and life sciences, data analytics and machine learning. Given this, it is necessary to ensure that economic growth is supported in Camden, in addition to housing growth, taking

into account the limited land available. Furthermore, the priority in the London Plan is to deliver CAZ uses in the Central Activities Zone (rather than housing).

- The character of the borough is highly constrained in terms of heritage (there are over 5,600 listed buildings, 40 Conservation Areas, 14 Registered Parks and Gardens and 53 protected squares), strategic viewing corridors, and protected open spaces and Metropolitan Open Land (for example, Hampstead Heath), which limits the ability to deliver higher levels of development.
- We can only allocate brownfield land, as there are no greenfield sites, which is a constraint to delivering higher levels of growth.

4.156 It should also be noted that none of the responses received to the Regulation 18 consultation on the draft Local Plan suggested that the Council should / could achieve substantially higher levels of growth. Furthermore the small numbers of sites proposed during the numerous calls for sites undertaken to support the preparation of the Plan reinforces that all reasonable sources of development have been identified.

4.3 Growth scenarios appraisal

4.157 This section appraises the three growth scenarios (identified in Table 4.1 above) against the SA framework set out in Chapter 3.

4.158 The appraisal is presented under 15 headings – one for each of the objectives that together comprise the SA framework, before the final section presents an overview ‘matrix’. Under each heading, the aim is to: 1) rank the scenarios in order of performance; and then 2) categorise the performance in terms of ‘significant effects’. The appraisal is also undertaken with minimal assumptions regarding development management policies, i.e. the aim is not to present an appraisal of three alternative Draft Plans.

4.159 The findings of the appraisal of the three growth scenarios are set out below:

Homes

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

4.160 Many people want to live in Camden but there is a limited supply of homes and prices are high. This is primarily due to the limited availability of land in the borough and competition from other uses, which have high returns on investment. As a result, people are often forced to move out of Camden, and many people who have grown up in the borough cannot afford to stay and start a family.

4.161 All of the three scenarios will deliver an increase in homes and promote the provision of a range of high quality and affordable housing to meet local needs (accepting that

the level of uplift will vary, with the higher growth option delivering more homes than the lower growth option), meaning all options are considered to have a 'limited or uncertain' positive effect.

4.162 It should however be acknowledged that none of the options will meet housing need in full. However, delivering higher levels of housing growth in Camden is not considered to be a reasonable alternative option due to the reasons set out in section 4.2 above.

4.163 Furthermore, whilst the higher growth option will inevitably deliver greater numbers of new homes, given it is likely that these will need to be delivered at higher densities than the other options, due to the limited availability of land, this could affect housing mix, and lead to the delivery of more one-bedroom homes, which would not meet identified need.

4.164 It should also be noted that the imminent review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the target that is in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2027, so this may mean that Camden's new Local Plan housing target is only in place for a very short period of time.

4.165 In conclusion, it is considered that the higher growth option performs best against this indicator, followed by the emerging proposed approach, and then the lower growth option. With regards to significant effects, all options are considered to have a 'limited or uncertain' positive effect.

Health

"Promote a healthy community"

4.166 Camden has one of the largest health inequality gaps in England and people suffering from poor health are generally concentrated in some of the borough's most deprived wards. Health is intrinsically linked to early life experience, education, employment, housing, leisure, and the local environment – otherwise known as the social determinants of health. These are the social, cultural, economic and environmental factors that shape the conditions in which we live. Planning can play a pivotal role in influencing key health determinants, addressing inequalities, and improving the physical and mental health, and well-being, of Camden's population.

4.167 All options have the potential to improve health and well-being and reduce health inequalities, through the delivery high quality new developments that are designed 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.

4.168 It should however be noted that the delivery of additional homes could put pressure

on existing health services in Camden; however this is mitigated for through the identification of new health facilities in the Plan and by the requirement for major applications to undertake Health Impact Assessments.

- 4.169 For the strategic sites at Camley Street, Murphy and Regis Road, the emerging preferred approach is focused strongly on place-making and the achievement of other health-related objectives. The higher growth strategy could lead to tension with these objectives, for example through a reduction in open space provision, or a change to housing types/mix, which may be required to enable the development of greater numbers of new homes. 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.
- 4.170 With regards, to the lower growth scenario, the assumption here is that the Local Plan would include a reduced emphasis on the 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 delivering new homes, jobs and infrastructure in these areas and addressing existing 'bad neighbour' issues.
- 4.171 In conclusion, it is considered that the emerging proposed approach performs best against this indicator, followed by the lower growth and higher growth options. With regards to significant effects, all options are considered to have a 'limited or uncertain' positive effect.

Equality

"Tackle poverty and social exclusion and promote equal opportunities"

- 4.172 The success of Camden's economy is not shared by all. The borough has some of the most deprived neighbourhoods in London as well as some of the most prosperous. Therefore, it is even more crucial that growth aids achieving equitable outcomes in Camden for all.
- 4.173 Clearly there are wide ranging benefits associated with growth that could help to tackle poverty and social exclusion and promote opportunities, for example around delivering affordable housing, delivering new community infrastructure and delivering affordable workspace (recognising that demand for corporate office space and the limited availability of land can make it challenging for start-ups, smaller businesses and not-for-profit organisations to find workspace). All options are therefore considered to have a 'limited or uncertain' positive effect.
- 4.174 Furthermore, all options include sites that will be delivered as part of the Council's Community Investment Programme, which is focused around delivering estate regeneration projects, that will help address deprivation and inequality.
- 4.175 Finally, it should also be noted that whilst the lower growth scenario may deliver less development, which could result in fewer community benefits and lower levels of affordable housing, it does serve to support local employment opportunities within

existing industrial areas for those with lower skills who might otherwise be at risk of unemployment.

4.176 In conclusion, it is difficult to differentiate between the growth scenarios in respect of equality. With regards to significant effects, all options are considered to have a 'limited or uncertain' positive effect.

Amenity

"Improve amenity by minimising the impacts associated with development"

4.177 Standards of amenity (the features of a place that contribute to its attractiveness and comfort) are significant factors in the health and quality of life of the borough's residents, families, workers, and visitors, and are fundamental to Camden's appeal and success. Camden's inner London location, the proximity of various uses, and the presence of major roads and railways means that amenity is a particularly important issue within the borough.

4.178 All options have the potential to impact on amenity and protecting amenity will be a key part of successfully managing Camden's growth and ensuring its benefits are properly delivered. When assessing the impact of growth on amenity key considerations include:

- privacy, overlooking and outlook;
- sunlight, daylight and overshadowing;
- impacts of artificial lighting levels;
- transport impacts, including the impact on the public transport network;
- the cumulative impacts of the construction phase;
- noise and vibration levels;
- odour, fumes and dust;
- microclimate;
- contaminated land; and
- impact upon water and wastewater infrastructure.

4.179 The higher growth option could be considered to have a greater impact on amenity (compared to the emerging preferred option), given it is associated with higher levels of development, that would likely be delivered at higher densities, involving taller, bulkier buildings that would likely occupy a greater site area, which could lead to overlooking, overshadowing, loss of daylight/sunlight and impact on microclimate.

4.180 Conversely, the lower growth option, could also have a greater impact on amenity (compared to the emerging preferred option) as it does not involve the re-development of key employment sites, which contain uses that are in some cases considered to be 'bad neighbours' and impact on amenity, for example through HGV movements.

4.181 In conclusion, it is considered that the emerging proposed approach performs best against this indicator, followed by the higher growth option and lower growth option.

With regards to significant effects, all options are considered to have a neutral effect.

Open space

“Conserve and improve open space provision”

- 4.182 Camden benefits from a rich and diverse natural environment and has a wide range of open spaces including parks, natural or semi-natural green spaces, housing estate amenity areas, playgrounds, historic cemeteries, churchyards, allotments, community gardens, outdoor sports facilities and the Regent’s Canal.
- 4.183 All options would help to conserve and improve open space provision, in line with Council’s adopted open space policy and none of the options are considered to have a direct impact on the function and use of an existing open space. However, the emerging proposed approach provides the best opportunity to deliver new open space in Camden to the benefit of local communities, through the redevelopment of existing sites (such as Camley St, Regis Road and Murphy) that currently do not provide any open space.
- 4.184 Although helping to conserve existing open space, the lower growth scenario would potentially lead to the delivery of less open space, compared to the emerging proposed approach, given that it assumes that the industrial sites of Camley St, Regis Road and Murphy will remain in their current use. Furthermore, whilst the higher growth scenario will contribute to the provision of open space, it may deliver less new open space compared to the emerging proposed approach, given that more land take may be required on sites to enable the development of greater numbers of new homes.
- 4.185 In conclusion, it is considered that the emerging proposed approach performs best against this indicator, followed by the higher growth option and lower growth option. With regards to significant effects, the emerging proposed approach is considered to have a ‘limited or uncertain’ positive effect and the high growth and lower growth options are considered to have a neutral effect.

Biodiversity

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

- 4.186 A significant number of open spaces in Camden are also designated for their nature conservation importance. Designated sites of nature conservation interest are shown on the Local Plan Policies Map. Taken together, these sites occupy some 414 hectares of land. They are:
- Hampstead Heath Woods Site of Special Scientific Interest (SSSI), which is Camden’s only SSSI. SSSIs are designated by Natural England due to their

nationally important habitats and species and/or geological features and must be given the highest protection in accordance with legislation.

- 39 Sites of Importance for Nature Conservation (SINC): As part of the evidence base for the Local Plan, Camden commissioned the London Wildlife Trust to undertake a review of these sites. This resulted in a number of boundary changes and the identification of 4 new SINC, which are reflected on the Policies Map.
- 4 statutorily designated Local Nature Reserves (LNR), which host a rich variety of flora and fauna – Adelaide, Belsize Woods, Westbere Copse (all managed by London Borough of Camden) and Camley Street Natural Park (managed by London Wildlife Trust).
- The Regent's Canal, which passes through the borough. It provides a flyway for bat populations and is therefore sensitive in parts to light pollution.

4.187 Camden's SINC and LNRs represent some of the most significant concentrations of habitat and species in the Borough. They are widely distributed, have varied functions (including rail embankments, London Squares, community gardens and burial grounds) and have an essential role in providing local access to nature.

4.188 All options have the potential to impact on biodiversity in a number of different ways. For example, on one hand, all new development will be required to deliver urban greening and biodiversity net gain; however on the other hand, the development of sites (particularly industrial sites adjacent to railways) 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.

4.189 Sites proposed for the intensification of existing industrial sites are all adjacent to a railway line, and land alongside railway lines is often of significant biodiversity value in the London context and designated as a Site of Importance for Nature Conservation. 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 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.

4.190 Given this it is considered that the higher growth scenario could result in biodiversity / green infrastructure objectives being compromised, through the need to deliver higher levels of growth on sites. However, the effect of this is uncertain, as design solutions could be implemented to mitigate biodiversity concerns, e.g. ensuring buffer strips are provided between areas of intensified built form and areas of biodiversity value. Indeed, targeted new green infrastructure within development sites could also support the functioning of adjacent areas of biodiversity value.

- 4.191 With regards to the emerging proposed approach, this option expects biodiversity improvements to be delivered on the Regis Rd, Murphy and Camley Street sites, which should have a positive effect against this objective.
- 4.192 Furthermore, whilst the lower growth scenario helps to protect biodiversity, it is unlikely to significantly contribute the enhancement of biodiversity, given that it seeks to protect existing industrial sites, which provide a key opportunity for delivering both on-site and securing contributions to the delivery of off-site biodiversity.
- 4.193 In conclusion, it is considered that the emerging proposed approach and lower growth scenario perform best against this indicator, followed by the higher growth option. With regards to significant effects, all options are considered to have a neutral effect.

Air quality

“Improve local air quality and limit exposure”

- 4.194 Poor air quality is a widespread issue in Camden, and the whole of Camden is defined as an Air Quality Management Area (AQMA) which was declared by the Council in 2002 to address nitrogen dioxide and particulate matter pollution. The GLA has identified a number of Air Quality Focus Areas in Camden, where the problems of high levels of air pollution and human exposure to air pollution are most acute.
- 4.195 Given that Camden is a highly accessible borough, and current adopted policy requires new development to be car free, all options are therefore likely to reduce reliance on the private car, which would help minimize air pollution. However, the actual use of more active and sustainable modes of travel will depend on people's behaviour.
- 4.196 There is a need to consider the construction stage of development, which can be associated with significant localised air (and noise) pollution. All options are likely to have a (limited or uncertain) negative effect in relation to this, however it should be noted that the Plan includes policies which seek to manage and mitigate construction impact.
- 4.197 Another consideration is around the opportunity to rationalise existing traffic movements associated with industrial sites (such as Camley Street, Regis Road and Murphy), which would help minimize air pollution. However, given the lack of evidence available in relation to this, it is unclear at this stage as to what could be achieved.
- 4.198 In conclusion, it is difficult to differentiate between the growth scenarios in respect of air quality. With regards to significant effects, all options are considered to have a 'limited or uncertain' negative effect.

Energy and resources

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

- 4.199 The built environment is considered to be responsible for around 25 percent of the UK's consumption-based greenhouse gas emissions. Carbon in the built environment is mostly attributable to operational and embodied carbon. Operational carbon is the emissions associated with energy used to operate the building, including heating, hot water, cooling, ventilation, lighting systems, equipment and lifts, while embodied carbon emissions are associated with materials and construction processes throughout the whole lifecycle of a building.
- 4.200 The Climate Change Act 2008 (as amended) sets a legally binding target for the UK to bring all greenhouse gas emissions to net zero by 2050. The Council declared a Climate and Ecological Emergency in 2019, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems, and set out its commitment to do everything it can to make Camden net zero by 2030.
- 4.201 The electricity and gas used by buildings for power and heating causes 85% of the direct carbon dioxide emissions in Camden. Given this, improving and adapting existing homes and buildings to make them more energy efficient and resilient to climate change (also known as retrofitting) is a key priority for the Council. In addition to helping to meet the Council's climate change objectives, improving buildings through measures such as the installation of improved insulation, low carbon heating, solar PV and thermally efficient windows can also help reduce energy costs and lead to significant savings for householders and businesses.
- 4.202 All buildings in England and Wales must comply with Part L 2021 of the Building Regulations which sets a minimum level of performance for the conservation of fuel and power. However, in order to deliver climate commitments, local authorities can seek to go further than the Building Regulations and set their own energy targets. Paragraph 161 of the National Planning Policy Framework (NPPF) states the planning system should support the transition to net zero by 2050 and should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions; minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 4.203 To inform the approach to the delivery of net zero development, the Council, along with 17 other London boroughs, commissioned a study on 'Delivering Net Zero'. Camden has also commissioned a further study on delivering energy reduction measures for existing buildings.

4.204 All options have the potential to support the efficient use of energy and resources through:

- prioritising and enabling the repurposing and re-use of existing buildings over demolition;
- minimising waste and whole life carbon, and increasing the re-use of resources in the construction and operation of new developments;
- supporting the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building;
- ensuring that new buildings are designed and constructed to be net zero carbon in operation; and
- utilising low carbon technologies and maximising opportunities for renewable energy generation and heat networks in new developments.

4.205 It is considered that the emerging proposed approach presents the greatest opportunity in this respect, given that development proposed would enable the reuse of resources, identify opportunities for heat networks and renewable energy generation. The higher growth option would also help to achieve these objectives but the positive effects may be outweighed by the need for taller buildings and larger basements to deliver greater levels of growth, which could reduce the opportunity for renewable energy generation by solar pv and generally feature a higher proportion of embodied carbon.

4.206 In **conclusion**, it is considered that the emerging proposed approach performs best against this indicator, followed by the higher growth and lower growth option. With regards to significant effects, the emerging proposed approach is considered to have a 'limited or uncertain' positive effect and the higher growth and lower growth scenarios are considered to have a neutral effect.

Water

"Protect and manage water resources (including groundwater)"

4.207 London is a water stressed area, and climate change may lead to limited water availability in the future, particularly in the summer.

4.208 Camden contains one groundwater Source Protection Zone (SPZ) with an inner and outer catchment. These are water abstraction sites whose purpose is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon drinking water abstraction. The inner SPZ is located within the southwest of Primrose Hill Park with the outer zone located in South Hampstead covering the area from Prince Albert Road to Swiss Cottage.

4.209 Areas to the north and south of Camden (around Hampstead Heath, Hampstead, Bloomsbury and Holborn) are also designated as Secondary A aquifers which are

capable of supporting local water supply. As such, groundwater is sensitive in these areas and the quality and quantity of groundwater needs to be protected.

- 4.210 All options support development in existing built-up areas and therefore any effect on the Groundwater Source Protection Zone and Secondary A aquifers is likely to be limited. Furthermore, the site allocation policies in the Plan include criteria to mitigate this.
- 4.211 In conclusion, it is difficult to differentiate between the growth scenarios in respect of water. With regards to significant effects, all options are considered to have a neutral effect.

Resilience

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

- 4.212 A key consideration when looking at resilience is flood risk. Camden is classified as being in Flood Zone 1 which signifies the lowest probability of flooding, as there are no main rivers within the borough. All main rivers historically located within Camden are now incorporated into the Thames Water sewer network. These are referred to as ‘lost’ or historic rivers and include the River Fleet, River Westbourne and River Tyburn.
- 4.213 Flooding from surface water and sewer surcharge therefore pose the greatest risk to flooding in Camden, and the risk is exacerbated due to the prevalence of the combined sewer system. The borough experienced significant flooding in 1975, 2002, and 2021, and the probability of such events recurring is likely to increase as a result of climate change. Camden also experiences some flooding from groundwater sources particularly in areas to the north and the south of the borough.
- 4.214 All options support development in existing built-up areas, where flooding from surface water and sewer surcharge pose a risk; however, development should be able to incorporate surface water management measures, such as sustainable drainage systems to address the existing flood risk, as well as that generated by new development. Furthermore, the development of large industrial sites such as those at Camley Street, Murphy and Regis Road should reduce the amount of impermeable surfaces on these sites through the introduction of areas of open space, which should also help manage flood risk.
- 4.215 Overall, it is difficult to differentiate between the growth scenarios in respect of flood risk, and a neutral effect is therefore expected.
- 4.216 Another key consideration when looking at resilience is overheating. The design of our environment has a significant effect on our experience and perception of heat. The UK’s climate is changing and in the coming decades periods of high temperature will become more common and more intense. Recent heatwaves have

demonstrated how high temperatures are a threat to health and wellbeing, our infrastructure and economic productivity.

- 4.217 Situated in the heart of London, Camden is surrounded by an urbanised landscape characterised by concrete structures, asphalt roads, and limited green spaces. These urban features absorb and retain heat, making cities noticeably warmer than rural areas. Given this, it is important to ensure that buildings and spaces in Camden are designed to promote cooling and reduce overheating.
- 4.218 Given the high-level nature of these growth options, it is not possible to distinguish between them with respect to climate change adaptation. The quantum and distribution of development is not likely to influence sustainable design and construction techniques in development or respond to extreme weather effects as a result of climate change.
- 4.219 In conclusion, it is difficult to differentiate between the growth scenarios in respect of resilience. With regards to significant effects, all options are considered to have a neutral effect.

Design

“Promote high quality and sustainable urban design”

- 4.220 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.
- 4.221 All options have the potential to promote high quality and sustainable design through the delivery of new development. However, the emerging proposed approach and higher growth scenarios, involve the development of key strategic sites, that are well-suited to a masterplanned and design-led approach to redevelopment, focused on place-making. Furthermore, the current industrial uses on these sites contribute little to local character and may be considered to be a detractor. Delivering higher levels of growth on the key strategic sites may however lead to bulkier more dense development and less open / public space, which may reduce any potential design benefits.
- 4.222 In conclusion, it is considered that the emerging proposed approach performs best against this indicator, followed by the higher growth option and lower growth option. With regards to significant effects, all options are considered to have a ‘limited or uncertain’ positive effect.

Historic environment

“Protect and enhance the historic environment”

- 4.223 Camden has a rich architectural heritage, with over 5,600 nationally listed buildings and structures and 40 conservation areas, which contribute towards local distinctiveness both within Camden and London as a whole. Given this, the historic environment is a key constraint to growth locally and, in turn, a key consideration for the appraisal of growth scenarios.
- 4.224 Of the two broad considerations that are a 'variable' across the growth scenarios, namely development density and use mix within individual development sites, the former has greatest implications for the historic environment. Briefly recapping the approach to defining scenarios: Conservation Area designations are given close consideration within Section 4.1 above, 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. However, it is recognised that development outside of conservation areas can result in historic environment impacts in the Camden context. Given this, 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.
- 4.225 Here, it is considered that the higher growth option has the potential to have a 'limited or uncertain' negative effect on heritage, given that development would need to be delivered at higher densities or greater heights compared to the other two scenarios, which could lead to a greater impact on the historic environment. Whereas, the lower growth scenario and proposed approach are considered to have a neutral effect, as whilst these options could result in heritage impacts, there is a greater opportunity for these to be mitigated and for benefits / enhancements in relation to the historic environment to be delivered.
- 4.226 In conclusion, it is considered that the lower growth scenario and the emerging proposed approach perform the best against this indicator, followed by the higher growth scenario. With regards to significant effects, the lower growth scenario and emerging proposed approach are considered to have neutral effects and the higher growth scenario is considered to have a 'limited or uncertain' negative effect.

Land

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

- 4.227 Given the built up, inner city, nature of Camden, all options involve the development of previously developed land. However, it is evident that the higher growth scenario and emerging preferred approach would use land more efficiently than the lower growth scenario, as they involve the intensification of key employment sites (e.g. Camley Street, Regis Road and Murphy) to deliver greater levels of housing and economic growth, when compared to the lower growth scenario, which involves the continued protection of industrial land rather than mixed use intensification.

- 4.228 Whilst the higher growth option delivers the greatest number of new homes, it could deliver less economic growth when compared to the emerging proposed approach, as maximising the number of homes could mean reduced provision of other uses.
- 4.229 In conclusion, it is considered that the emerging proposed approach and higher growth scenario perform the best against this indicator, followed by the lower growth option. With regards to significant effects, the emerging proposed approach and higher growth scenario are considered to have a 'limited or uncertain' positive effect, and the lower growth option is considered to have a negative effect.

Economy and employment

“Encourage and accommodate sustainable economic growth and employment opportunities”

- 4.230 This is a key indicator given the scope of the alternative growth scenarios.
- **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. However, industrial land supply is widely considered to be an issue across London, and in Inner London in particular. Given this, there is clear support for the reprovision and intensification of industrial uses, as part of the mixed use redevelopment of existing industrial sites. Whilst there could potentially be some shift in terms of the particular types of industrial uses that could be supported following intensification (i.e. heavier versus lighter industrial uses, also warehousing and logistics / distribution uses), any shift 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. (See also see discussion under 'Equality', regarding implications for local employment opportunities.) Given this, the emerging proposed approach is considered to have a 'limited or uncertain' positive effect, as it aims to intensify employment uses within existing industrial sites, thereby contributing to economic growth. Whereas the lower growth scenario would continue the status quo on existing industrial sites and therefore have a neutral effect, as it would be not contribute to increased economic growth. Furthermore, whilst the higher growth scenario will support the delivery of economic growth, it could also lead to a reduction in industrial provision, in order to accommodate greater numbers of new homes on sites, thereby having a neutral effect.
 - **Offices** – the Employment Needs Assessment identifies the requirement for office floorspace from 2023 to 2041 as being 406,359 sqm above the total existing stock and the emerging proposed approach seeks to deliver this. Whilst the lower growth scenario presents a 'business as usual' situation on existing industrial sites, which will protect existing office uses, it would also reduce the opportunity to provide additional office space through the intensification of these sites. With regards to the higher growth scenario, there is concerns that this could lead to pressure for new homes in place of office floorspace as part of mixed use

developments, and feasibly even housing only schemes instead of mixed use schemes. However, there is naturally an element of uncertainty around future market demand.

- 4.231 In conclusion, it is considered that the emerging proposed approach performs the best against this indicator, followed by the higher growth and lower growth options. With regards to significant effects, the emerging proposed approach is considered to have a 'limited or uncertain' positive effect, and the higher growth and lower growth options are considered to have a neutral effect.

Centres

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

- 4.232 In light of the discussion in Section 4.1, there is little reason to suggest that the alternative growth scenarios will have significant implications for any of the borough's town centres. In fact, the quantum and distribution of growth proposed under all options should help support designated centres to remain sustainable and adaptable for the future, by encouraging the retention and expansion of commercial and retail uses in the borough's designated centres.
- 4.233 In conclusion, it is difficult to differentiate between the growth scenarios in respect of centres. With regards to significant effects, all options are considered to have a 'limited or uncertain' positive effect.

4.4 Appraisal conclusion

- 4.234 Table 4.2 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 then 2) categorise performance in terms of 'significant effects' using red / amber / light green / green. Red indicates a significant negative effect; amber a minor negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect. Light grey indicates a neutral effect.

Table 4.2: 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	=	=	=
Amenity	2	1★	2
Open space	2	1★	2
Biodiversity	1★	1★	2
Air quality	=	=	=
Energy and resources	2	1★	2
Water	=	=	=
Resilience	=	=	=
Design	2	1★	2
Historic environment	1★	1★	2
Land	3	1★	1★
Economy & employment	2	1★	2
Centres	=	=	=

4.235 Following the appraisal of the options, the lower growth scenario was discounted as it would not deliver the numbers of homes needed to meet the housing target set out in the Local Plan. Whilst it is acknowledged that none of the three alternative options appraised would meet housing need in full, this option, by its nature, makes less of a contribution to meeting housing need than the others. Furthermore, it would deliver

lower levels of economic growth than the emerging proposed option and would be unlikely to deliver the same level of social, environmental and economic benefits that would be associated with the other two growth options.

4.236 The higher growth option was also discounted as it would necessitate the delivery of high-density development and taller buildings which could lead to the over-development of already constrained sites - particularly as a design led approach has been taken to inform the optimum site capacity. This in turn could impact on the character of certain places in the borough, the natural and historic environment and designated viewing corridors. Furthermore, whilst this option delivers the most housing, it would not deliver the mix of housing types needed (as it would deliver a higher proportion of one- or two-bedroom homes, due to the need for more dense housing provision). This option would also deliver lower levels of economic growth and open space (compared to the emerging proposed option), as a result of the need to maximise housing delivery on available sites.

4.237 The preferred option is therefore the emerging proposed approach, as it would deliver the additional homes needed to help meet the borough's housing target, factoring in the limited land available in Camden to deliver new development, whilst also delivering economic growth in line with the recommendations in the Economic Needs Assessment (ENA, 2023). This option will also provide a mix of housing types (including more family housing and more affordable homes), enable better place-making and support the delivery of community and Council aspirations for the redevelopment of the industrial sites at Camley Street, Regis Road and Murphy. Furthermore, this option provides significant opportunities to deliver social, environmental and economic benefits to Camden's communities, whilst making efficient use of the limited land available.

Chapter 5 – Reasonable Alternatives

- 5.1 This chapter sets out the reasonable policy options (alternatives) that were identified and appraised as part of the preparation of the Local Plan Proposed Submission Draft.
- 5.2 With regards to the consideration of reasonable alternatives, it is important to note that the new Camden Local Plan seeks to update the Camden Local Plan 2017. Although the current Local Plan is still operating effectively, it was considered beneficial to update the Plan to ensure that future development in Camden most effectively meets Council priorities and secures benefits for the borough and its residents, responding to changed circumstances, in particular:
- the publication of We Make Camden, the Council’s Corporate Strategy;
 - the Council’s declaration of a climate and ecological emergency;
 - changes to national planning policy, including the revised permitted development rights and changes to use classes;
 - the London Plan 2021;
 - economic and social changes (such as changes in working patterns and shopping habits).
- 5.3 Given this, the scope to identify reasonable alternatives in relation to policy objectives is limited. Furthermore, policies have been developed to respond to local circumstances and deliver Council priorities, meaning that not having a policy or solely relying on the National Planning Policy Framework and the London Plan, is not considered to be a reasonable option.

5.1 Consideration of Alternative Options

- 5.4 As part of the preparation of the London Plan Proposed Submission Draft a number of reasonable alternatives were identified in relation to policy options. These are discussed below, and the appraisal of the alternative policy options is set out in Appendix 3.

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

- 5.5 Policy H2 of the Camden Local Plan 2017 currently seeks 50% of the additional floor area in proposed non-residential developments to be provided as self-contained housing. 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.

- 5.6 Since the adoption of the 2017 Camden Local Plan, a new London Plan has been adopted. Policy SD5 of the London Plan 2021 states that Local Plan's should ensure that residential development within the CAZ does not compromise the strategic uses as set out in paragraph 2.4.4 of the LP2021. Part G of SD5 also sets out that any mixed-use development within the CAZ should not lead to a net loss of office floorspace and the use of land use swaps, credits and off-site contributions should also be explored as per Part H.
- 5.7 Furthermore, 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 the 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.
- 5.8 Given this, as part of the preparation of the new Local Plan, two policy options have been considered in relation to Policy H2:
- Option 1 – Retain and extend the area that the policy covers.
- Option 2 – Remove the policy from the Plan.
- 5.9 Both options have been appraised against the SA framework as reasonable alternatives, and this is set out in Appendix 3. The appraisal shows that whilst option 2 (removing Policy H2 from the Plan) may give rise to a minor positive effect against the economy objective, on balance a greater number of positive effects are predicted for option 1 (retain and extend the area that the policy covers), particularly against the SA objectives for homes, health, land and centres. Option 1 would also support Plan objectives in continuing to ensure Camden's local economy is strong, sustainable and inclusive in addition to providing everyone in Camden a place where they can call home.
- 5.10 Policy option 1 was therefore considered to be the preferred policy option, given the acute housing need in Camden and the constrained supply. Furthermore, developing a mix of uses on individual sites and across an area can also be beneficial in other ways, such as:
- increasing community safety and security by providing a range of activities that attract people at different times during the day and evening;
 - contributing to the creation of areas that are diverse, distinctive and attractive;
 - reducing the need to travel between homes, jobs and services;
 - overcoming the loss of customers for shops and services arising from increased home-working and less consistent occupation of workplaces; and
 - allowing an efficient use of land, with housing developed above those uses which benefit from direct ground floor access or a street-level frontage, such as shops.

Policy CC2 – Prioritising the Retention of existing buildings

5.11 Policy CC2 seeks to prioritise the retention of existing buildings and builds on the established approach in the current Local Plan. In response to representations made on the draft Local Plan at Regulation 18 stage the policy has been updated to state that:

*“The Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council’s satisfaction that: the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and **optimises site capacity.**”*

5.12 The decision could have been taken not to amend the policy approach, but it was decided that on balance the policy should be updated to take into account the fact that there may be situations where the current layout and design of a building precludes its optimisation in terms of providing a significant uplift in non-residential floorspace and new homes. This reflects the approach set out in London Plan Policy D3 ‘Optimising site capacity through a design led approach’ which states *“Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth.”*

5.13 The draft Local Plan policy CC2 and the Local Plan Proposed Submission Draft policy CC2 have both been appraised against the SA framework as reasonable alternatives and this is set out in Appendix 3.

5.14 The appraisal shows that the additional policy criteria will likely benefit the homes, land, and economy objectives, providing greater clarity over where the Council is likely to accept proposals which include substantial demolition.

Policy CC5 - Sustainability improvements to existing buildings

5.15 Through the preparation of the draft Local Plan it was clear that if we are to deliver the Council’s commitment to be net zero carbon by 2030 it is crucial that we support the retrofitting of existing buildings to make them more energy efficient. Draft Local Plan Policy CC5 (Energy reduction in existing buildings) sought to support adaptations to existing buildings to reduce the energy needed to occupy them, it also set out fabric efficiency U-values for extensions to buildings, and included requirements for existing buildings that would create a home or provided 500sqm or more floorspace.

5.16 In drafting this policy it was apparent that further evidence was needed to inform the approach taken. Given this, the Council commissioned Etude to produce a technical evidence base looking at how operational energy use and carbon emissions can be reduced in existing buildings. As part of the Study Etude undertook energy and cost modelling for three common typologies in order to estimate building performance for

different retrofit and extension scenarios. As part of the Study the following alternative policy options were considered:

Option 1 - Require extensions to existing buildings to achieve fabric efficiency U values that are higher than the current Buildings Regulations.

- 5.17 The Draft Local Plan included fabric efficiency U -values to be adhered to where works are proposed to be undertaken to alter, extend, or convert an existing building. The specifications related to U-Values contained in the LETI Climate Emergency Design Guide. While consultation responses were generally supportive in this area of policy there remained a question as to what effect these requirements would have upon the whole building, for carbon emissions and space heating demand relative to the additional cost to the applicant. The Study provided the opportunity to explore this as a policy option.

Option 2 - Require proposals for building extensions to include a heat pump.

- 5.18 A requirement to replace fossil fuel heating (gas boilers) with a low carbon heat source (heat pumps) was included in the Draft Local Plan for new build development and existing buildings, which created a new home or provided / replaced 500sqm or more floorspace. Early findings from the Study showed that heat pumps significantly reduce carbon emissions and operational energy use and as such this was considered a reasonable policy option to explore, given the Council's net zero carbon target.

Option 3 - Instead of requiring measures to be undertaken as part of minor works to an existing building, have a policy approach which seeks to support and encourage improvements to existing buildings.

- 5.19 The Draft Local Plan Policy included a number of requirements and targets to improve the energy efficiency of existing buildings. Consultation responses queried whether these requirements should be targeted at major development rather than more minor works. The Council's family friendly approach also seeks to make it easier for residents to improve and extend their homes in response to their needs. This option would remove requirements for minor works to existing buildings in response to comments raised through the consultation and the Council's family friendly approach.

- 5.20 All options have been appraised against the SA framework as reasonable alternatives, and this is set out in Appendix 3. Out of the three options, the appraisal has shown that Option 2 performs the best and is likely to have significant positive effects against the energy objective through reductions expected in carbon emissions and operational energy. In contrast, the positive effects associated with Option 1 are likely to be limited, as the Etude Study shows that on their own, the use of fabric measures in an extension is unlikely to have a significant positive effect.

- 5.21 Option 3 will likely have positive effects against the homes, energy, and design objectives through the Council's support and encouragement to improve the sustainability of homes and buildings in the borough. This effect is likely to be limited

however as the policy is supportive rather than requiring improvements to be undertaken.

5.22 Whilst option 2 was shown to have the greatest positive effect against the SA objectives, this option has been discounted as it is not considered reasonable to require homeowners / small business owners to install a heat pump when undertaking minor works to an existing building (for example a small extension). This is mainly due to the cost associated with the installation of a heat pump and other potential work required (for example changes to radiators / decorating to make good) relative to the works proposed to be undertaken.

5.23 Option 1 was discounted due to the additional cost of requirements (compared to just relying on current Building Regulations) and the limited positive effects predicted, which are not considered significant enough to justify an addition to the policy, particularly given the Council's family friendly ambition.

5.24 Option 3 was therefore considered to be the preferred option because:

- It supports the Council's drive to improve the energy efficiency and resilience of existing buildings in the borough, whilst not adding on undue extra cost;
- It is considered the most family friendly approach as it supports people to undertake work to their homes, whilst not adding on undue extra cost; and
- It seeks to support and encourage retrofitting, rather than requiring measures to be undertaken, which may have disincentivised people carrying out some home improvements, due to the added cost involved.

Policy CC6 - Energy use and the generation of renewable energy

5.25 The Sustainability Appraisal of the draft Local Plan identified a policy choice in respect of delivering net zero development in the borough. The Interim SA stated –

“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).”*

5.26 Both options have been appraised against the SA framework as reasonable alternatives, and this is set out in Appendix 3. The appraisal shows that both options would likely have positive effects against the energy objectives, as they seek to reduce the carbon impact of development. Option 2 is also predicted to have positive effects against the homes and design objectives as the approach rewards efficiencies in design and fabric performance.

5.27 Policy option 2 was the preferred option because:

- It considers all the energy used in a building, whereas policy option 1 only considers regulated energy;
- Performance is measured against a number of metrics (space heating demand, and energy use intensity), whereas policy option 1 measures a relative improvement over a ‘notional building’, not an absolute performance metric;
- Building regulations compliance models significantly underestimate space heating demand. This devalues the effect of fabric and heating system efficiency measures; and
- The energy metric can be monitored post occupancy.

Policy IE4 - Affordable Workspace

5.28 The draft Local Plan proposed to set a target for developments involving 1,000sqm employment floorspace to secure 20% of the gross floorspace to be provided at 50% of market rents for a minimum period of 15 years.

5.29 The viability work for the draft Local Plan also explored a range of alternative options in respect of this and concluded that *“draft Policy IE4 pragmatically and appropriately allows for the flexible application of its affordable workspace requirements from proposed developments including offices, research and development uses or light industry”*.

5.30 The Interim SA of the draft Local Plan found that *“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.”

- 5.31 In preparing the Local Plan Proposed Submission Draft, Policy IE4 has been updated to ensure that any impact on viability is mitigated, reflecting comments made by the development industry on the draft Local Plan. The policy now states that the Council will seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years. The supporting text of the policy also notes that where a scheme is also required to deliver housing under Local Plan Policy H2 (Maximising the Supply of Housing from Mixed Use Schemes), priority will be given to maximising the delivery of permanent self-contained homes, and in particular the provision of affordable housing, so as not to prejudice housing delivery.
- 5.32 The draft Local Plan policy IE4 and the Local Plan Proposed Submission Draft policy IE4 have both been appraised against the SA framework as reasonable alternatives and this is set out in Appendix 3.
- 5.33 The appraisal shows that the additional flexibility provided in the Local Plan Proposed Submission Draft in relation to the delivery of affordable workspace mitigates uncertain negative effects upon the delivery of homes in the borough.

5.2 Conclusion

- 5.34 The consideration and appraisal of alternative options has informed the plan-making process by helping to refine the contents of the Local Plan Submission Draft, so that it maximises the benefits of sustainable development and avoids, or at least minimises, the potential for adverse effects.
- 5.35 The preferred approach in the Local Plan Proposed Submission Draft has been developed in light of: the assessment of alternative options; the responses to engagement on the key issues for the Local Plan; the evidence we have collected and commissioned; and the review of national, regional and local plans and programmes.

Chapter 6 – Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft Vision and Objectives

6.1 This chapter sets out and appraises the Camden Local Plan Proposed Submission Draft vision and objectives against the SA Framework. The Sustainability Appraisal tables for the vision and objectives are set out in Appendix 4 of this report.

6.1 Local Plan Vision

6.2 The Council's vision for the borough is set out in We Make Camden. The vision for the Local Plan is therefore based on the vision of We Make Camden:

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.

6.3 We Make Camden sets out six ambitions for the borough, set out below. The Vision has been appraised with these ambitions.

1. Camden is a borough where every child has the best start in life
2. Camden's local economy should be strong, sustainable and inclusive - everyone should have a secure livelihood to support them to live a prosperous life
3. Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute
4. Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well and age well
5. Everyone in Camden should have a place they call home

6.4 The vision for Camden sets out a general ambition for development to deliver social, economic and environmental aspirations. This will enable the borough to be an attractive place to live, work and invest.

6.5 If the vision is achieved, it can be expected to lead to minor positive effects in relation to the following SA objectives:

Homes - because the vision and ambitions seek to ensure everyone has a home.

Health - because the vision and ambitions seek to support good health, wellbeing and connection for everyone so that they can start well, live well and age well.

Equality – because the key emphasis of the vision is to ensure no one gets left behind. This will deliver positive outcomes for all, and ensure that inequality is actively challenged.

Economy – because the vision and ambitions seek to ensure that Camden’s local economy is strong, sustainable and inclusive, where everyone should have a secure livelihood to support them to live a prosperous life.

- 6.6 The vision is unlikely to have any adverse effects in relation to the SA objectives. Due to the fact they are not specifically mentioned or indirectly affected, the vision's contribution to the achievement of the following SA objectives is likely to be neutral: Amenity, Open space, Biodiversity, Air quality, Energy and resources, Water, Resilience, Design, Heritage, Land, Centres. These neutral effects are generally centred on sustainability and design and whilst these aspects are silent in the vision and ambitions, these issues are addressed in the Local Plan Objectives, as set out below.
- 6.7 All of the effects of the vision are subject to some uncertainty since their achievement will depend on the details of the Local Plan policies and site allocations which are designed to implement it. (These have been appraised separately in Chapter 7 in this SA Report).

6.2 Local Plan Objectives

- 6.8 A series of objectives have been developed for the Local Plan to help deliver the vision and ambitions of We Make Camden. The strategic objectives of the Plan and the sustainability appraisal of the objectives are set out below.

Strategic objective 1

To ensure that development in Camden responds to the climate emergency by delivering zero carbon development, reducing energy use in existing buildings, 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.

- 6.9 This objective seeks to ensure that all development in Camden responds to the climate emergency. This should support the ‘homes’ and ‘equality’ SA objectives, as it means that development in Camden should help ensure those living in the borough have the opportunity to live in a more energy efficient home, which is cost efficient to run.
- 6.10 Reducing the effects of climate change may have minor positive effects for the ‘health’ SA objective, in terms of managing the risk of extreme weather events on health. Ensuring that new and existing buildings reduce the effects of climate change, in promoting cooling and reducing overheating, and managing flood risk should also have a positive effect against the SA objective on ‘health’. Zero carbon development is also likely to have a positive effect on air quality (SA objective ‘air quality’), reducing the proportion of harmful emissions.

- 6.11 In addition to this, this objective should have positive effects against the SA objectives for 'energy and resources', 'resilience', and 'design', in relation to the efficient use of resources, reducing energy use in development, and requiring buildings and spaces between buildings to be able to respond to the changes we are already experiencing in Camden such as flooding, drought, and overheating.

Strategic objective 2

To 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.

- 6.12 This objective seeks to increase the supply of homes to meet existing and future needs which should have positive effects against the SA objective 'homes'. The emphasis on the delivery of affordable homes should also have positive effects on the 'equality' SA objective. Furthermore ensuring access to good quality housing should have a positive effect against the 'health' SA objective. Finally, the commitment to increase the supply of homes in Camden is likely to have positive effects for the SA objective 'land' through the assumption that this will likely be achieved through making the best use of land available.

Strategic objective 3

To make sure that development meets the needs of Camden's diverse communities and enables safe, strong, inclusive, 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.

- 6.13 This objective seeks to ensure future development in Camden meets the needs of Camden's communities and that inequality and isolation are reduced, through the provision of accessible facilities and services that the communities need. This objective should have positive effects against the SA objectives for 'health' and 'equality', in addition to 'resilience' and 'design', in ensuring that development helps build resilient communities and the role that good design plays in delivering this.

Strategic objective 4

To 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.

- 6.14 This objective seeks to strengthen Camden's nationally important economy and ensure that opportunities are maximised for Camden residents, business, and voluntary sector. This should help to accommodate sustainable economic growth in the borough with positive effects for the SA objectives for 'economy' and 'centres'. The emphasis on education and training is likely to have positive effects for the SA objective for 'equality', particularly in areas which experience higher levels of deprivation, and also the SA objective for 'health'.

Strategic objective 5

To ensure our designated centres are accessible and sustainable, to enhance their unique character and support their varied roles as centres of trade, community activity, creativity, business, tourism and learning.

- 6.15 This objective seeks to ensure that the borough's designated centres continue to thrive and support their varied roles for trade, community, business, tourism, and learning. This objective should have positive effects against the SA objectives for 'economy' and 'centres'. Positive effects are also likely for the SA objectives for 'health' and 'equality' given the role that designated centres play in providing local employment, a range of community services and enabling access to healthy food choices.

Strategic objective 6

To promote high quality, inclusive and sustainably designed development which protects resident's amenity, respects and conserves the unique character and history of Camden's neighbourhoods, celebrates and reflects the diversity of Camden's communities, and enables families to remain in the borough and thrive.

- 6.16 This objective recognises the diversity of Camden's communities and seeks to promote development that protects residential amenity and respects and conserves the unique character and history of Camden's neighbourhoods, to enable families to remain in the borough and thrive. This objective should therefore have positive effects against a number of the SA objectives including 'homes', 'health', 'equality', 'amenity', 'energy', 'resilience', 'design', and 'heritage'.

Strategic objective 7

To 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.

- 6.17 This objective seeks to promote active travel, with the priority being walking, wheeling, and cycling, and supports investment in public transport to reduce reliance

on the private car. This objective should therefore have positive effects against the SA objectives for 'health' and 'equality', in terms of providing greater opportunity for active travel / healthy pursuits. Positive effects are also likely for SA objective 'air quality' where the focus on walking, wheeling, cycling and public transport should reduce the use of private vehicles and in turn harmful emissions.

Strategic objective 8

To improve access to parks and green spaces and enhance biodiversity, by protecting and enhancing existing assets and providing new green spaces and habitats.

- 6.18 This objective seeks to protect and enhance existing green spaces and create new ones. The emphasis on open space and biodiversity means this objective should have positive effects against the SA objectives for 'open space' and 'biodiversity'. Positive effects are also likely for SA objective 'health', as open space encourages healthy pursuits, and SA objective 'equality', in increasing access to nature.

Strategic objective 9

To promote health and well-being 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 and sports facilities.

- 6.19 This objective seeks to promote health and wellbeing through good design, improving access to nature, enabling healthy food choices, promoting active lifestyles, and improving access to healthcare and sports facilities. This should have positive effects against the SA objectives for 'health', 'equality', 'open space', 'biodiversity' and 'design'.

6.3 Conclusion and Recommendations

- 6.20 The Local Plan vision and strategic objectives have the most positive effect on the SA objectives for Health and Equality. This reflects the Council's ambition to improve health and wellbeing and reduce inequality, to ensure that Camden is a place where no one gets left behind, securing better outcomes for all.
- 6.21 Other positive effects have been identified in relation to the SA objectives for homes, open space, biodiversity, energy and resources, resilience, design, economy and centres.

6.22 The strategic objectives could make more explicit reference to measures to the need to use land more efficiently, protection of water resources, air quality, the historic environment and amenity; however, it is recognised that more detailed policies within the Camden Local Plan either directly or indirectly address these SA objectives. The policies in the Camden Local Plan Proposed Submission Draft are appraised in Chapter 7.

Chapter 7 - SA of the Camden Local Plan Proposed Submission Draft

- 7.1 This chapter sets out and appraises the contents of the Camden Local Plan Proposed Submission Draft. The appraisal is presented under the 15 topic headings that together comprise the core of the SA framework (see Chapter 3). Under each heading the aim is to:
- Discuss the area policies and site allocations;
 - Discuss topic specific policies; and then
 - Conclude on significant effects in respect of the Local Plan as a whole.
- 7.2 The Sustainability Appraisal tables for the policies in the Plan are set out in Appendix 4 of this report.

7.1 Homes

“To promote the provision of a range of high quality and affordable housing to meet local needs”

Area policies

- 7.3 Many people want to live in Camden but there is a limited supply of homes and prices are high. This is primarily due to the limited availability of land in the borough and competition from other uses, which have high returns on investment.
- 7.4 It is important to ensure that we help keep Camden’s social mix and make sure that the borough does not become polarised between wealthy and less well-off residents. We face the challenge of providing both more homes and a more varied range of housing to meet existing and future housing needs, in particular those of young people and families, who often struggle to find suitable and affordable homes in Camden.
- 7.5 The policies for South, Central, West and North Camden (Policies S1, C1, W1 and N1) set out the overarching strategy to support the delivery of new homes in these areas. With the South, Central, and West Camden policies being most closely aligned with this SA objective, as they support the delivery of a significant uplift in housing supply to help meet local need.
- 7.6 Whilst sites are allocated in North Camden to help deliver new homes, the availability of development sites here is limited due to the number of constraints, including a large area of Metropolitan Open Land (Hampstead Heath) and extensive conservation area coverage.

- 7.7 Policy S2 sets out the overarching approach to delivering development at Euston, which is identified as an Opportunity Area in the London Plan, with significant potential for intensification and an opportunity to comprehensively transform Euston Station and the immediate area into a world-class transport interchange and new residential and business district, delivering new homes and jobs. This policy states that development at Euston will be expected to deliver between 1,500 and 2,500 additional homes, along with the provision of replacement homes. Whilst the majority of the homes due to be provided at Euston will come forward outside of the Plan period, it is still considered that this site will have a significant positive effect against the housing objective.
- 7.8 The SA has identified a neutral effect against this objective for Policy S4 Bloomsbury Campus Area. As whilst the policy indicates that the Council will support proposals for student housing in specific circumstances provided academic needs can also be met. It also states that given the existing concentration of higher education in the Campus Area, the benefits of co-locating University facilities, and the high value and limited supply of land, the Council will give a high priority to development of academic and ancillary facilities for the University of London in the Campus Area. Consequently, Policy S4 indicates that in specific circumstances we will not seek the inclusion of self-contained homes as part of development in the area.

Site allocation policies

- 7.9 The Camden Local Plan Proposed Submission Draft includes 70 site allocations, the majority of which are allocated to deliver new homes, as self-contained housing is the priority land-use in the Plan. The exceptions to this are:
- S18 134 – 149 Shaftesbury Avenue – which is allocated for a cinema / theatre use; and
 - S30 Birkbeck College, Malet Street; S31 Senate House (NW quadrant), Malet Street; and S32 20 Russell Square – which are allocated for higher education (academic and ancillary space) in accordance with the Bloomsbury Campus area policy (Policy S4).
- 7.10 A large number of sites (not including the sites in the tables at the end of the area chapters, which are generally already subject to planning permission) that do not currently provide housing as an existing use are allocated for housing in the Plan. These sites will help to maximise the delivery of new homes in Camden and are noted for reference below:
- S5 -120-136 Camley Street
 - S6 - 104-114 Camley Street and Cedar Way Industrial Estate
 - S7 – 24-28 Royal College Street (Parcellforce and ATS Tyre Site)
 - S8 - St. Pancras Hospital
 - S9 - Shorebase Access
 - S10 - Bangor Wharf and Eagle Wharf
 - S11 - Former Royal National Throat, Nose and Ear Hospital
 - S12 - Belgrove House

- S13 - Former Thameslink Station, Pentonville Road
- S14 - Land at Pakenham Street and Wren Street
- S16 – Former Central St Martins College
- S17 - Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street
- S19 - Cockpit Yard and Holborn Library
- S20 – York Way Depot and adjacent land at Freight Lane
- C2 - Regis Road and Holmes Road Depot (with the exception of homes within Holmes Road Depot)
- C3 - Murphy Site
- C4 - Kentish Town Police Station
- C5 - 369-377 Kentish Town Road
- C6 - Kentish Town Fire Station
- C7 - Morrisons Supermarket
- C9 - 100 Chalk Farm Road
- C11 - Network Rail land at Juniper Crescent
- C16 – Shirley House
- C17 – Camden Town over station development
- C19 – Arlington Road former depot site
- W2 - O2 Centre, carpark and car showroom sites and 14 Blackburn Road
- W3 - 11 Blackburn Road
- W5 - 188-190 Iverson Road
- W6 – Land to the rear of Meridian House
- W7- Gondar Gardens
- N2 - Mansfield Bowling Club
- N3 - Queen Marys House (ancillary accommodation)
- N4 - Hampstead Delivery Office

7.11 A number of strategic sites are allocated in the Plan, including sites at Camley Street (S5 and S6); Kentish Town (C2 and C3); Camden Goods Yard (C7, C8, C9, C10, C11 and C12); and West Hampstead (W2). These sites will deliver a significant uplift in housing in the borough, to help meet local need, and are predicted to have the most positive effect against this SA objective.

7.12 Sites are also allocated in the Plan to help meet the housing needs of specific groups, including:

- Housing for older people or other people with care or support requirements – The following sites have been allocated to help meet the need for housing for older people or other people with care or support requirements in line with Policy H8 of the Local Plan: S5 120 – 136 Camley Street; S6 104 – 114 Camley Streer and Cedar Way Industrial Estate; S7 24- 86 Royal College Street; C2 Regis Road and Holmes Road Depot; C3 Murphy Site; C10 Juniper Crescent; C11 Network Rail land at Juniper Crescent; C12 Gilbey’s Yard; C13 West Kentish Town Estate; C15 Wendling Estate and St Stephens Close; W2 O2 Centre, car park, car

showrooms and 14 Blackburn Road; W7 Gonder Gardens Reservoir; and N2 Former Mansfield Bowling Club.

- Gypsy and Traveller accommodation – S20 York Way Depot and adjacent land at Freight Lane and C27 land adjacent to Constable House, Adelaide Rd, have been allocated to help meet the need for Gypsy and Traveller accommodation in line with Policy H11 of the Local Plan.
- Student accommodation – The following sites have been allocated to help meet the need for student accommodation in line with Policy H9 of the Local Plan: S9 Shorebase Access; S16 Former Central St Martins College; C3 Murphy Site; C4 Kentish Town Police Station; C6 Kentish Town Fire Station; C9 100 Chalk Fram Road; C14 Hawkridge House; C16 Shirley House; C17 Camden Town over-station development; C18 UCL Camden Campus; and C19 Arlington Road Depot.

7.13 These sites are therefore predicted to have a positive effect against this SA objective.

Topic specific policies

7.14 Key policies that are broadly supportive of the SA Homes objective include:

- H1 (Maximising housing supply) sets out the Council's strategy for maximising housing supply to deliver a minimum of 11,550 additional homes over the plan period to 2041.
- Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) seeks to maximise the delivery of homes from large non-residential schemes within a defined area. Whilst this policy is likely to have a positive effect, there are some tensions with economy SA objective, as noted below.
- 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 policy will likely have a positive effect with regards to the delivery of new homes / housing objectives. However, there is a need to balance this against other policy requirements that also impose a cost on development.
- Policies H3 (Protecting existing homes) and H5 (Protecting and improving affordable housing) seek to protect existing homes and affordable homes.
- Policy IE2 (Offices) will likely have minor positive effects on the SA objective for homes, as the policy supports the conversion of existing office buildings into housing (providing relevant criteria are met). Policy IE3 (Industry) also supports the intensification of large industrial sites and the co-location with housing where appropriate.
- Policies SC2 (Access for All) and D3 (Design of housing) require accessible and adaptable housing to be provided in new developments. Policy D3 also sets out a number of criteria to guide the design of new homes to ensure they meet the needs of all Camden's residents.

- Policy D4 (Extensions and alterations) supports applications for extensions and alterations to existing buildings to deliver additional residential floorspace and / or additional homes, provided the criteria in the policy are met.
- Policy SC3 (Social and community infrastructure) states that where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a social or community use being continued on a site, then the Council's preferred alternative will be affordable housing.

7.15 Local Plan housing policies H6 (Housing choice and mix), H7 (Large and small homes), H8 (Housing for older people, homeless people and other people with care or support requirements), H9 (Purpose built student accommodation), H10 (Housing with shared facilities), and H11 (Accommodation for travellers) also seek to provide for the need and demand for different types of homes in Camden.

7.16 Potential tensions with this objective have been identified in relation to some of the climate change policies which could lead to uncertain effects against this objective, including:

- Policy CC2 (Retention of Existing Buildings) which seeks to prioritise the retention of existing buildings, which could impact on the supply of new homes and the mix of dwelling sizes provided. However to mitigate against this the policy in the Local Plan Proposed Submission Draft has been updated to state that "*The Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council's satisfaction that: the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and **optimises site capacity.***"
- Climate policies CC1 (Responding to the climate emergency), CC5 (Sustainability Improvements to existing buildings) and CC6 (Energy use and the generation of renewable energy) seek to ensure that new homes created in the borough from existing or new buildings are more energy efficient, which should help to improve overall comfort for residents and make them more economical to run. However the higher build costs associated with delivering more energy efficient housing could impact on overall delivery. The high land values in Camden and subsequent returns on investment should help to mitigate against this though.

7.17 There is also a potential tension between objectives around securing larger homes, in accordance with established needs, and maximising the total supply of homes. However the Council's aspiration is for new homes being built in Camden to 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.

Conclusion

- 7.18 The Camden Local Plan Proposed Submission Draft includes a number of policy measures aimed at both maximising housing supply and delivering a range of housing types to meet local housing need. The Plan also sets out the overarching framework to support housing delivery in the South, Central, West and North areas of Camden and allocates sites to help deliver this.
- 7.19 Whilst policies which support alternative land uses or have cost/viability implications have the potential to lead to a degree of tension with housing-related objectives, the Plan is clear that self-contained housing is the priority land-use in Camden, recognising the extent of housing need locally.
- 7.20 Whilst the SA of the draft Local Plan predicted a neutral impact, on balance a **limited or uncertain positive effect** is now predicted against this SA objective, given the fact that the Local Plan Proposed Submission Draft now includes sites to help meet the need for student accommodation and gypsy and traveller accommodation in Camden.

7.2 Health

“To promote a healthy community”

Area policies

- 7.21 Camden has one of the largest health inequality gaps in England and people suffering from poor health are generally concentrated in some of the borough’s most deprived wards. Health is intrinsically linked to early life experience, education, employment, housing, leisure and the local environment – otherwise known as the social determinants of health. These are the social, cultural, economic and environmental factors that shape the conditions in which we live.
- 7.22 The policies for South, Central, West and North Camden set out the Council’s approach to the delivery and location of new homes, jobs, retail, and leisure uses in line with the Plan’s vision and objectives, which should have a positive effect on population health. Furthermore, these policies set out a range of infrastructure requirements which both support healthy lifestyles (through the provision of new open space, community facilities and sustainable transport measures) and new health care facilities, which should benefit existing and future residents.
- 7.23 In addition to this, the policies for the Euston Area and Bloomsbury Campus Area set out the framework to guide development in these areas which seek to promote the delivery of new open spaces, environmental improvements, and active travel, which should lead to a positive effect against this objective for the people using these spaces.

Site allocation policies

7.24 A number of the site allocation policies promote active travel and/or support the delivery of social and community infrastructure and/or open space, which is likely to have a positive effect on health. Sites of note are discussed below:

- S5 120 -136 Camley Street - seeks the delivery of new and improved pedestrian and cycling routes; and new open spaces.
- S6 104 – 114 Camley Street and Cedar Way Industrial Estate - seeks the delivery of new and improved pedestrian and cycling routes; new open spaces; and free, publicly accessible toilets.
- S7 24 – 86 Royal College Street – seeks the delivery of new public routes and green spaces.
- S8 St Pancras Hospital - seeks the creation of new open space and new public routes for pedestrians and cyclists.
- S11 Former Royal National Throat, Nose and Ear Hospital – seeks the creation of new open space and a new pedestrian route through the site.
- S12 Belgrove House – seeks a range of community benefits, including enhanced education and employment opportunities; community space; and contributions towards public realm and highway improvements, including significant improvements to the pedestrian and cycling environments adjacent to the site.
- S14 Land at Pakenham Street and Wren Street – seeks contributions to the improvement of pedestrian and cycle routes and the public realm around the site.
- S15 Land to the rear of the British Library – seeks the delivery of new open space; a community hub; and new routes and spaces through the site to ensure its integrated into the local area.
- S16 Former Central St Martins College - seeks contributions to the delivery of significant public realm improvements as part of the Holborn Liveable Neighbourhood project.
- S17 Selkirk House – seeks contributions to the delivery of significant public realm improvements as part of the Holborn Liveable Neighbourhood project.
- S18 135 – 149 Shaftesbury Avenue – supports the delivery of the Shaftesbury Avenue Safe and Healthy Street Scheme.
- S20 York Way Depot and adjacent land at Freight Lane – emphasises the need to improve the walking and cycling environment near the site.
- C2 Regis Road and Holmes Road depot - seeks the delivery of new and improved pedestrian and cycling routes; new open spaces; new and/or improved community facilities; and free, publicly accessible toilets.
- C3 Murphy Site - seeks the delivery of new and improved pedestrian and cycling routes; new open spaces; new and/or improved community facilities; provision for young people; and free, publicly accessible toilets.
- C4 Kentish Town Police Station - seeks to provide a safe and attractive walking, wheeling and cycling route between Holmes Road and Regis Road to improve connections with surrounding communities.
- C5 369 – 377 Kentish Town Road – seeks to facilitate the future delivery of an attractive pedestrian and cycle route to link Kentish Town Station to Hampstead Heath.

- C7 Morrison’s Supermarket and C8 Former Morrisons Petrol Station – seeks contributions towards the delivery of a new route for pedestrians and cyclists; supports the delivery of public open space.
- C10 Juniper Crescent – seeks the provision of additional open space, including green space, play facilities and tranquil areas; seeks contributions towards the delivery of a new route for pedestrians and cyclists.
- C11 Network Rail land at Juniper Crescent – seeks contributions towards the delivery of a new route for pedestrians and cyclists.
- C12 Gilbeys Yard – seeks the provision of additional open space, including green space, play facilities and tranquil areas; seeks contributions towards the delivery of a new route for pedestrians and cyclists.
- C13 West Kentish Town Estate and C15 Wendling Estate and St Stephens Close – seek contributions toward improvements to local open spaces and improvements to local walking and cycling routes.
- C17 Camden Town over-station development – seeks to deliver a new civic square and public realm improvements.
- C18 UCL Camden campus – seeks to protect existing open space and allotments.
- W2 O2 Centre, car park, car showrooms, 14 Blackburn Road – seeks the delivery of new and improved pedestrian and cycling routes; new open spaces; a new NHS health centre; new and/or improved community facilities; and free, publicly accessible toilets.
- N2 Former Mansfield Bowling Club – seeks the delivery of new public open space; enhanced tennis facilities; and an ancillary sports pavilion on-site.

Topic specific policies

7.25 Health and wellbeing is a key area of focus in the Local Plan. Policies which are supportive of health objectives include:

- Policy DS1 (Delivering Healthy and Sustainable Development) which 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.
- Policy SC1 (Improving health and wellbeing) seeks to ensure that development in the borough considers local issues relating to health and wellbeing at an early stage in the planning process in order to positively improve outcomes for the people of Camden. The policy has been developed with the Council’s public health team and seeks to deliver the Council’s Health and Wellbeing Strategy. The draft Local Plan has also been subject to a Health Impact Assessment, which has helped to improve the health outcomes of the Plan.
- Policy SC2 (Access for all) was introduced in the Regulation 19 Local Plan to reflect the comments expressed as part of the consultation on the draft Local Plan. The policy seeks to ensure that developments are designed to promote

access and inclusion, and that the barriers which prevent everyone from accessing facilities and opportunities are removed.

- SC3 (Social and community infrastructure) sets out the Council's approach to the protection and provision of social and community infrastructure in Camden.
- SC4 (Open space) seeks to protect existing open spaces and secure the provision of new open spaces, to support health and wellbeing.
- SC5 (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.
- All the housing policies are considered to have a positive effect against this objective, as the availability of good quality housing that meets residents needs is a key determinant of population health.
- Climate policies CC1 (Responding to the Climate Emergency), CC5 (Sustainability Improvements to existing buildings), and CC6 (Energy use and the generation of renewable energy) support improvements to existing homes to improve the overall living environment and support the switch to low carbon heating, which should cumulatively have a positive impact on air quality, by moving away from fossil fuels.
- Natural Environment Policies NE1 (Natural Environment), NE2 (Biodiversity) and NE3 (Trees) all seek to promote good physical and mental health through enabling access to nature.
- Inclusive economy policies IE1 (Delivering a sustainable and inclusive economy), IE6 (Supporting Designated Centres and Essential Services), IE7 (Hot food takeaways), IE8 (Gambling uses), IE9 (Delivery led food business) and IE10 (Markets) should lead to positive effects against this objective. IE1 supports residents seeking work to access jobs, skills, education and training opportunities. IE6 provides for the retention and development of key services in communities, while IE7, IE8, and IE9 focus on limiting uses in the boroughs centres that may have negative impacts on the health and wellbeing of people living and working in the borough. Furthermore IE10 seeks to promote and protect markets recognising that they can be important places of social and cultural exchange and in some cases help to meet the specialist food needs of ethnic communities.
- 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. 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. This seeks to maximise health and wellbeing, 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.
- T3 (Public Transport) seeks contributions to public transport and T4 (Shared transport infrastructure and services) seeks contributions to the delivery of shared transport schemes, e.g. cycle hire docking stations.
- T5 (Parking and car free development) seeks to limit the availability of parking and require all new developments in the borough to be car-free to reduce car ownership and vehicle use and encourage the use of alternative, sustainable modes of travel. This should benefit health in terms of helping to reduce air pollution from cars.
- DM1 (Delivery and Monitoring) sets out the Council approach to working with relevant providers to ensure that the necessary infrastructure (including health facilities) is secured to support development in Camden.

7.26 Potential tensions with this objective have been identified in respect of SC7 (Public Houses), which could lead to uncertain effects against this objective. As on one hand the protection of pubs of community value may benefit health as they support social networks and interaction, however on the other hand, it could lead to the promotion of unhealthy behaviours, for example excess alcohol consumption, which would have a negative impact on health.

Conclusion

7.27 In conclusion, health and wellbeing is clearly a key focus of all aspects of the Local Plan including area policies, site allocations, and the topic specific policies. As such, it is fair to predict a **significant positive effect**.

7.3 Equality

“To tackle poverty and social exclusion and promote equal opportunities”

Area policies

7.28 Camden has some of the most deprived neighbourhoods in London as well as some of the most prosperous. The policies for South, Central, West and North Camden set out the Council’s approach to the delivery of investment, in terms of new homes, jobs, and infrastructure, in these areas to help tackle poverty and promote equal opportunities, which should lead to a positive effect against this objective.

- 7.29 The policy for South Camden (S1) states that “to ensure the sustainable growth and success of the Knowledge Quarter, major proposals for additional employment, research and/or learning floorspace within this area will be required to contribute to reducing inequalities and increasing life chances in local residential communities by maximising community benefit at the planning, construction and end-user phases, including supporting increased access to jobs, skills training and educational opportunities”. Therefore a significant positive impact against this objective is predicted.
- 7.30 In addition to this, the policy for the Euston Area (S2) seeks to prioritise local need, ensuring that development contributes to reducing inequalities, improving health and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed. This is likely to have a significant positive effect against this objective.

Site allocation policies

- 7.31 A number of the site allocations are likely to give rise to positive effects for communities which experience social exclusion and deprivation, in addition to promoting equality of access to buildings and services. Sites of note are discussed below:
- S6 104 – 114 Camley Street and Cedar Way Industrial Estate – includes provision for free, publicly accessible toilets.
 - S12 Belgrove House – seeks a range of community benefits, including enhanced education and employment opportunities; and community space.
 - S15 Land to the rear of the British Library – seeks the delivery of a community hub, and a learning, employment or resource centre for the Knowledge Quarter.
 - C2 Regis Road and Holmes Road depot - seeks the delivery of new and/or improved community facilities; free, publicly accessible toilets; and contributions towards improvements at Kentish Town Thameslink and Underground station (including the provision of step-free access, a new station entrance and an enhanced town square) and Gospel Oak station (including a new eastern access and improved public realm).
 - C3 Murphy Site - seeks the delivery of new and/or improved community facilities; provision for young people; free, publicly accessible toilets; and contributions towards improvements at Kentish Town Thameslink and Underground station (including the provision of step-free access, a new station entrance and an enhanced town square) and Gospel Oak station (including a new eastern access and improved public realm).
 - C10 Juniper Crescent – supports complementary uses, such as employment or community uses.
 - C12 Gilbeys Yard – supports complementary uses, such as employment or community uses.

- C13 West Kentish Town Estate – seeks contributions towards the enhancement of the Queen’s Crescent neighbourhood centre through the creation of a new frontage along the street to host community or commercial uses.
- C15 Wendling Estate and St Stephens Close – supports the re-provision and enhancement of health and community facilities with partners to ensure no net loss in provision.
- C17 Camden Town over station development – seeks contributions to step free access to Camden tube station to ensure its accessible and inclusive for all.
- W2 O2 Centre, car park, car showrooms, 14 Blackburn Road – seeks the delivery of step free access to West Hampstead and Finchley Road Underground Stations; a new NHS health centre; new and/or improved community facilities; and free, publicly accessible toilets.

Topic specific policies

7.32 No policies are considered to give rise to tensions with this objective. Key policies that are broadly supportive of equality / equalities objectives include:

- Policies IE1 (Growing a successful and inclusive economy), IE2 (Offices), IE3 (Industry), IE4 (Affordable Workspace), IE6 (Supporting Designated Centres and Essential Services) and IE10 (Markets) which aim to secure a strong, diverse, sustainable and inclusive economy in Camden, maximising opportunities for residents, businesses and the voluntary sector to contribute to and share in the success of Camden’s economy. Specific requirements of note include:
 - Expects larger schemes to provide a range of unit sizes to include space available for smaller businesses;
 - Resists the loss of viable employment space where this offers lower cost or flexible space;
 - Seeks to address barriers to work such as the provision of childcare facilities to support working families; and
 - Requires applications involving a loss of employment floorspace to make a financial contribution towards local skills, training, and employment initiatives.

7.33 Other policies that are predicted to have a positive effect against this SA objective are:

- Policies DS1 (Delivering Healthy and Sustainable Development) and DM1 (Delivery and Monitoring), which are discussed under ‘health’ above. It should also be noted that Policy DS1 seeks contributions to the Council’s Citizen Scientist community research programme. The Citizen Scientist’s research will be used to inform a variety of strategies and projects that will help ensure that the right infrastructure is provided to support growth and development in the borough.
- Housing policies – H2 (Maximising the supply of self-contained housing from mixed use schemes), H4 (Maximising the supply of affordable housing), H5 (Protecting and improving affordable housing), H6 (Housing choice and mix), H7 (Large and small homes), H8 (Housing for older people, homeless people and other people with care or support requirements), H9 (Purpose built student

accommodation), H10 (Housing with shared facilities), and H11 (Accommodation for travellers), which are discussed under 'housing' above.

- Supporting Communities policies – SC1 (Improving health and wellbeing), SC2 (Access for All), SC3 (Social and community infrastructure), SC4 (Open Space), SC6 (Cultural facilities), and SC7 (Public Houses), which are discussed under 'health' above.
- Natural Environment policies – NE1 (Natural Environment), and NE2 (Biodiversity), which are discussed under 'health' above.
- Design policies – D1 (Achieving Design Excellence), D3 (Design of Housing), and D8 (Shopfronts), which are discussed in more detail under 'design' below.
- Policy A2 (Safety and Security), which is discussed under 'health' above.
- Transport policies - T1 (Safe, Healthy and Sustainable Transport), T2 (Prioritising Walking, Cycling and Wheeling), and T3 (Public Transport), which are discussed under 'health' above.

Conclusion

- 7.34 In conclusion, development supported through the Local Plan should lead to wide-ranging benefits including affordable housing, new jobs, training and apprenticeships, community facilities and open spaces. The approach in the Plan also focuses on designing places that reflect and celebrate Camden's diversity and that are welcoming, inclusive and accessible to all, to meet the needs of Camden's diverse communities. The changes made through the consultation process have helped to improve the appraisal from 'limited or uncertain' to a **significant positive effect** against the equality objective.

7.4 Amenity

“To improve amenity by minimising the impacts associated with development”

Area policies

- 7.35 The policies for South, Central and West Camden and the Euston Area support the delivery of significant levels of development, in terms of new homes, employment floorspace and infrastructure, which is likely to have an impact on the amenity of people who live and work in those areas, particularly in terms of construction impacts. Whilst all development will have some construction impacts, it is likely that these will be relatively short-lived, particularly when compared to the ongoing benefits of development. Furthermore any impact should be managed by the relevant policies in the Plan that concern the protection of residential amenity.

Site allocation policies

- 7.36 The site allocations could potentially give rise to a degree of tension with this objective particularly in areas where there are development clusters, notably at Camden Goods Yard, Camley Street and St Pancras Way, Kentish Town, West Kentish Town, and West Hampstead.
- 7.37 Any negative effects arising from development activity (in terms of construction or demolition) would however be mitigated by topic specific policies. However, it is likely that these effects, whilst short term, will be longer lasting for the larger strategic sites.
- 7.38 Other amenity effects arising from site allocation policies include:
- N4 Hampstead Delivery Office – there is potential for a positive effect in relation to the replacement of the delivery office with residential uses, removing vehicular traffic.
 - S5 120-136 Camley Street; S6 104 Camley Street, 108 – 114 Camley Street and Cedar Way Industrial Estate; S8 St Pancras Hospital; S20 York Way Depot and adjacent land at Freight Lane; C2 Regis Road and Holmes Road Depot; C3 Murphy; C4 Kentish Town Police Station; C6 Kentish Town Fire Station; W3 11 Blackburn Rd; W4 13 Blackburn Rd; W5 188 – 190 Iverson Rd - on these sites the retention and or/ intensification of employment uses and introduction of residential would have a potential tension with this SA objective without effective design and management.
 - S9 Shorebase Access; S5 and S6 Camley Street site allocations; S13 Former Thameslink; S20 York Way Depot and adjacent land at Freight Lane; C2 Regis Road and Holmes Rd Depot; C3 Murphy; C5 369 – 377 Kentish Town Road; C7 Morrisons Supermarket; C8 Former Morrisons Petrol Filling Station; C9 100 Chalk Farm Road; C10 Juniper Crescent; C11 Network Rail land at Juniper Crescent; C13 West Kentish Town Estate; C15 Wendling Estate and St Stephens Close; C17 Camden over station development; W2 O2 Centre and car park, car showrooms, 14 Blackburn Road – on these sites noise sensitive uses are proposed in locations where there are existing noise generating uses or operations that may have the potential for negative effects without effective design and management.
- 7.39 Furthermore, there is also a potential tension where existing residential areas are located in close proximity to sites that have been identified as being locations where tall buildings may be an appropriate form of development, due to the increased potential for overlooking, potential impact on daylight/sunlight and the potential creation of microclimates; however it is considered that this would be mitigated through the Tall Buildings policy.

Topic Specific Policies

- 7.40 Key policies that are broadly supportive of the amenity objective include:

- A1 (Protecting amenity) 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 includes appropriate measures to mitigate potential impacts where necessary. It also sets out the Council's approach to managing the construction impacts and transport impacts associated with development. It will apply to all developments in Camden, including the site allocations in the Plan.
- 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'.
- CC2 (Prioritising the retention of existing buildings) could potentially have a positive effect on the living conditions of neighbouring residents as the demolition and construction phases of development can take longer than refurbishment and extension.
- CC8 (Overheating and cooling) could limit the proportion of air conditioning units which can emit noise at a time when people are outside more often, and can cumulatively contribute to making the local micro-climate hotter where there are a number of air conditioning units.
- D4 (Extensions and Alterations) considers the impacts of extensions on residential amenity.
- D6 (Basements) sets out the approach to protecting the amenity of neighbours in the development of basements.
- IE9 (Delivery led food businesses) seeks to ensure that the impact of these businesses are effectively managed.
- T6 (Sustainable movement of goods, services and materials) seeks to control developments which are likely to generate significant movement of goods, services or materials by road and seeks the submission of transport assessments and management plans to manage the impact of development.

7.41 Other policies that are predicted to have a positive effect against this SA objective are:

- Housing policies – H2 (Maximising the supply of self-contained housing from mixed use schemes), H9 (Purpose built student accommodation), H10 (Housing with shared facilities), and H11 (Accommodation for travellers), which are discussed under 'housing' above.
- Design policies – D1 (Achieving Design Excellence) and D7 (Advertisements), which are discussed in more detail under 'design' below.
- Transport policies - T1 (Safe, Healthy and Sustainable Transport) and T2 (Prioritising Walking, Cycling and Wheeling).

7.42 Potential tensions with this objective have been identified in relation to the following policies, which could lead to uncertain or negative effects against this objective:

- Policies encouraging and, in some cases, requiring the move away from fossil fuels for heating to low carbon sources are likely to result in an increase in heat pump installations - see CC1 (Responding to the climate emergency), CC5 (Sustainability improvements to existing buildings), and CC6 (Energy use and the generation of renewable energy). Heat pumps could increase noise levels experienced by neighbouring properties depending on the type of heat pump and where they are installed. Most heat pumps benefit from general permitted development rights. Where planning permission is required, policy A4 (Noise) will need to be applied to ensure adverse impacts are mitigated. Additional guidance provided on the potential noise impact of air source heat pumps is set out in policy CC5 (Sustainability Improvements to Existing Buildings).
- Policy IE3 (Industry) which supports the intensification of certain industrial sites to also deliver housing.
- Policy SC3 (Social and Community Infrastructure) which supports the delivery of new community facilities provided they do not have an unacceptable impact on amenity.
- Policy SC6 (Cultural Facilities) which supports the delivery of new cultural facilities provided any impact on amenity is mitigated.
- Policy SC7 (Public Houses) which supports the provision of new public houses in appropriate locations subject to the requirement of the other policies in the Plan.
- Policy D2 (Tall Buildings), however, (as discussed previously) 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, which seek to mitigate any adverse impacts.

Conclusion

7.43 In conclusion, whilst growth in the Camden context does inevitably give rise to tensions with objectives relating to amenity, particularly at the construction stage, the Local Plan sets out to avoid, minimise, and mitigate impacts through site specific and area wide topic specific policy. It is also important to note that in the baseline situation, development comes forward regardless, but in a less well planned way. Whilst the SA of the draft Local Plan predicted a 'limited or uncertain' positive effect, on balance, and for the reasons set out above, **a neutral effect** is considered more appropriate here.

7.5 Open space

“To conserve and improve open space provision”

Area policies

7.44 Over the Plan period there is likely to be increasing pressure on existing open spaces in the borough due to anticipated population growth, which is in part linked to new development. The policies for South, Central, West and North Camden and the policies for the Euston Area and Bloomsbury Campus Area all support the delivery of new and improved open space, meaning a positive effect against this objective is predicted.

Site allocation policies

7.45 There are a large number of site allocations which include requirements to enhance, and in some cases increase, open space, including in areas where there is a known local need. Key site allocations that will contribute to the delivery of open space, and are therefore predicted to have a positive effect against this objective, include:

- S5 120 -136 Camley Street
- S6 104 – 114 Camley Street and Cedar Way Industrial Estate
- S7 24 – 86 Royal College Street
- S8 St Pancras Hospital
- S11 Former Royal National Throat, Nose and Ear Hospital
- S15 Land to the rear of the British Library
- C2 Regis Road and Holmes Road depot
- C3 Murphy Site
 - C7 Morrison’s Supermarket and C8 Former Morrisons Petrol Station
 - C10 Juniper Crescent
 - C12 Gilbeys Yard
 - C13 West Kentish Town Estate
 - C15 Wendling Estate and St Stephens Close
 - W2 O2 Centre, car park, car showrooms, 14 Blackburn Road
 - N2 Former Mansfield Bowling Club

7.46 In addition, Policy C18 UCL Camden Campus seeks to protect existing open space and allotments.

Topic specific policies

7.47 Key policies that are broadly supportive of open space 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.
- SC4 (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 wellbeing, enhance biodiversity and make space for nature.

- D1 (Achieving Design Excellence) supports the provision of open space in developments and D3 (Design of Housing) supports the provision of outside space, e.g. communal gardens in housing developments.
- T1 (Safe, Healthy and Sustainable Transport) requires development to contribute to the delivery of highways greening measures, including the provision of pocket parks, greenspace, and rain gardens.

7.48 Potential tensions with this objective have however been identified in relation to policies NE2 (Biodiversity), SC5 (Food growing), CC1 (Responding to the climate emergency) and CC11 (Sustainable drainage) which could lead to uncertain effects against this objective. Given that providing greater areas of land to support biodiversity, food growing and SuDs could reduce the amount of conventional open space provided on a site. However it is not possible to conclude with any certainty that this would create a significant tension with open space objectives in the Camden context, given the potential for development to deliver new and enhanced open space.

Conclusion

7.49 In conclusion, the Plan has a strong emphasis on the protection of existing, and delivery of new, open space and a number of development sites have been identified to support the delivery of new open space. As such, **a limited or uncertain positive effect** is predicted.

7.6 Biodiversity

“To protect and enhance existing habitats and biodiversity and to seek to increase these where possible”

Area policies

7.50 Camden has a number of open spaces which are designated for their nature conservation importance including:

- Hampstead Heath Woods Site of Special Scientific Interest (SSSI), which is Camden’s only SSSI;
- 39 Sites of Importance for Nature Conservation (SINC);
- 4 Local Nature Reserves (LNR); and
- The Regent’s Canal.

7.51 Camden’s SINC and LNRs represent some of the most significant concentrations of habitat and species in the borough. They are widely distributed, have varied functions (including rail embankments, London Squares, community gardens and burial grounds) and have an essential role in providing local access to nature.

7.52 The policies for South, Central, West and North Camden and the policy for the Euston Area all support the delivery of biodiversity enhancements in these areas, meaning a positive effect against this objective is predicted.

Site allocation policies

7.53 A number of site allocations have the potential to impact on biodiversity, particularly those in close proximity to Sites of Importance for Nature Conservation, however criteria have been added to these site allocations to mitigate any potential effect. Key site allocations that will contribute to the delivery of the biodiversity objective include:

- S5 120 -136 Camley Street and S6 104-114 Camley Street – seek to provide a larger biodiversity corridor to enhance the North London Line at York Way which is a Borough Grade 2 Site of Importance for Nature Conservation.
- S8 St Pancras Hospital – expects development to be designed to conserve or enhance the adjacent St Pancras Gardens which is a Borough Grade 2 Site of Importance for Nature Conservation.
- S9 Shorebase – seeks to retain and enhance the green buffer at the northern end of the site through the provision of new trees and planting, to help preserve and enhance St Pancras Gardens.
- S20 York Way Depot and adjacent land at Freight Lane – seeks to enhance the adjacent biodiversity corridor.
- C2 Regis Rd and Holmes Rd Depot – seeks to create new and enhanced areas of biodiversity across the site, and enhance biodiversity corridors along the railway lines to the north and northwest of the site (which are a designated Borough Grade 1 Site of Important Nature Conservation), in order to support biodiversity and create and improve connections for wildlife to support the delivery of the Camden Nature Corridor.
- C3 Murphy – seeks to create new and enhanced areas of biodiversity across the site, and enhance biodiversity corridors along the railway lines to the north and northwest of the site (which are a designated Grade 1 Site of Important Nature Conservation), in order to support biodiversity and create and improve connections for wildlife to support the delivery of the Camden Nature Corridor.
- C7 Morrisons Supermarket - seeks to ensure that open spaces include areas for biodiversity and wildlife. Proposals will be expected to investigate the potential for the provision of vegetation buffers along the railway lines to create and improve connections for wildlife.
- C11 Network Rail land at Juniper Crescent - seeks to establish a green corridor along the edge of the railway, which can act as a buffer and habitat for wildlife in connection with adjacent sites.
- C13 West Kentish Town – seeks to create new and enhance existing areas of biodiversity across the site to support biodiversity corridors and create and improve connections for wildlife from nearby Sites of Important Nature Conservation to support the delivery of the Camden Nature Corridor.

- W2 O2 Centre, car park, car showrooms and 14 Blackburn Road – requires development to enhance biodiversity on-site, contribute to the enhancement of the adjacent Site of Important Nature Conservation along the railway lines and deliver urban greening measures.
- W5 188 – 190 Iverson Rd – requires development to be designed and operated to ensure there is no impact on the designated open space (Medley Orchard) to the south of the site, which is a Borough Grade 1 Site of Importance for Nature Conservation (SINC) and Local Green Space; seeks the delivery of biodiversity enhancements; and the retention of the mature street trees along the frontage of the site with Iverson Road.
- W6 Land to the rear of Meridian House – seeks to ensure that the trees in the wooded copse within the site, which are subject to a TPO, are protected and sensitively integrated into any redevelopment.
- W7 Gondar Gardens Reservoir – expects development to be focused on the un-designated area of the site, to protect the designated open space, SINC and Local Green Space; and include measures to enhance the designated open space, SINC and Local Green Space and ensure there is no harm to existing habitats and protected species on the site.

7.54 Furthermore, there is also the potential for site allocations next to the Regent’s Canal to cause a negative effect on biodiversity and protected species. Given this additional policy criteria have been added to the following allocations to mitigate potential negative effects:

- S8 St Pancras Hospital;
- S10 Bangor Wharf and Eagle Wharf;
- C12 Gilbeys Yard; and
- C16 Shirley House.

Topic specific policies

7.55 Key policies that are broadly supportive of biodiversity objectives include the following:

- 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. It:
 - Requires all major schemes, and those that have the potential to adversely 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, targeted offsite enhancement could be considered;

- Expects 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;
- Requires applicant to address indirect impacts from factors such as shading, light pollution and risk of disturbance;
- Resists development where it is likely to worsen deficiencies in access to natural greenspace; and
- Expects suitable developments to integrate measures to support wildlife, including swift bricks, bat/bird boxes, bee bricks and permeable fencing.
- NE3 (Tree protection and planting) sets out the approach to tree planting and protection, supporting the Council's Tree Planting Strategy.
- SC4 (Open Space) and SC5 (Food Growing) seek to protect existing and provide new area of open space / community food growing areas which supports biodiversity.
- D1 (Achieving Design Excellence) and D3 (Design of Housing) both support the enhancement and biodiversity in the borough.
- Transport policies - T1 (Safe, Healthy and Sustainable Transport) and T2 (Prioritising Walking, Cycling and Wheeling) support the delivery of urban greening measures and T5 (Parking and car-free development) resists the development of boundary treatments and gardens to provide vehicle cross-overs / on-site parking, which supports biodiversity.
- CC1 (Responding to the climate emergency), CC8 (Overheating and Cooling) and CC11 (Sustainable drainage) will have indirect impacts on biodiversity in the borough. Positive impacts for drainage and biodiversity are likely where developers replace existing hard surfaces with permeable landscaping, provide multifunctional drainage systems, and include green roof spaces.

7.56 Potential tensions with this objective have however been identified in relation to policy D2 (Tall Buildings) which could lead to uncertain effects against this objective. This is due to the fact that tall buildings have the potential to overshadow areas for nature conservation (for example at C2 Regis Road and Holmes Road Depot, C3 Murphy Site, S8 St Pancras Hospital, and S20 York Way Depot and adjacent land at Freight Lane). However policy D2 seeks to ensure these effects are avoided or mitigated and also states that the Council will consider the impact on biodiversity, for example migratory routes and bird collisions, in accordance with Policy NE2 (Biodiversity), when determining applications for tall buildings.

7.57 There is also a need to consider other policies in the Local Plan that could lead to a tension with biodiversity objectives and that could potentially even generate a significant negative effect, in isolation or in combination. This would include 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 this would create a significant tension with biodiversity objectives in the Camden context, given the potential for development to deliver urban greening and significant biodiversity net gains. There could also be a tension between biodiversity and some

open space objectives, but this is quite a detailed, site-specific issue suited to being addressed at the decision-making stage.

Conclusion

7.58 In conclusion whilst the Plan includes policies to protect and promote biodiversity in Camden a **'limited or uncertain' positive effect** on the baseline is predicted.

7.7 Air quality

“To improve local air quality and limit exposure”

Area policies

7.59 The Council declared the whole the borough to be an Air Quality Management Area (AQMA) in 2002 to address nitrogen dioxide and particulate matter pollution.

7.60 The infrastructure priorities in the South, Central, West, and North area policies seek to promote active travel in the borough and improve the pedestrian / cyclist experience through the delivery of new pedestrian and cycle links and urban greening measures. This should result in less motor vehicle trips, which should benefit air quality, however the degree of positive effect is uncertain.

7.61 Furthermore, the development proposed in the South, Central, West, and North areas are likely to give rise to increased construction traffic and dust from construction sites. However this impact will not be permanent and will not be too dissimilar from the baseline situation.

Site allocation policies

7.62 The GLA have designated several Air Quality Focus Areas (AQFA) in Camden. These are areas where high pollution and human exposure exist. There are a number of site allocations within AQFAs, including:

- S11 Former Royal National Throat, Nose and Ear Hospital
- S12 Belgrove House
- S13 Former Thameslink, Pentonville Road
- S15 Land to the rear of the British Library
- S16 Former Central St Martins College
- S17 Selkirk house
- S24 294-295 High Holborn
- S26 8-10 Southampton Row
- C16 Shirley House
- C17 Camden Town over station development

- C21 Grand Union House
- W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road
- W6 Land to the rear of Meridian House
- W8 88-92 Kilburn High Road
- W9 Land at Midland Crescent, Finchley Road
- W10 BP Petrol Station, 104A Finchley Road
- W12 100 Avenue Road
- W14 317 Finchley Road

7.63 However, it is expected that relevant plan policies will ensure effective mitigation at these locations.

7.64 Allocations for the redevelopment of existing car parks, for example at the Morrisons supermarket and the O2 centre, car park, and car showrooms should lead to a reduction in car parking and provision for other modes of transport. This should help to reduce air pollution in these areas, although the degree of impact is uncertain.

Topic specific policies

7.65 Key policies that are broadly supportive of air quality objectives include the following:

- A3 (Air quality) is clearly the most relevant 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. 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.
- 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. It aims to maximise health and wellbeing, 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, including improving air quality.
- T3 (Public Transport) and T4 (Shared transport infrastructure and services) should help reduce the number trips made by private vehicles, which should benefit air quality.
- 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 motor vehicle use. Car-free development means that no car parking spaces are provided within the site other than those reserved for disabled people 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).

- 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) supports a move away from fossil fuels for heating, which should benefit air quality. Other climate change policies that will also help support this objective include: CC2 (Prioritising the Retention of existing buildings), CC5 (Sustainability Improvements to existing buildings), CC6 (Energy use and the generation of renewable energy), CC7 (Heat networks), and CC8 (Overheating and cooling).

7.66 Potential tensions have been identified with this objective and homes, where policies such as H1 (Maximising housing supply) conflict with Policy A3 (Air quality) which seeks to ensure that homes or other sensitive uses are resisted in locations with particularly poor air quality. The scale of this effect is not considered significant in view of the Council's Air Quality Annual Status Reports however and mitigation will be required in areas of poor air quality in the borough, in accordance with Policy A3.

Conclusion

7.67 Poor air quality is an important issue locally and it is important to recognise that growth will continue to come forward in the absence of a new Local Plan. There is good potential to address this issue through relevant Plan policies 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 is guided by the Council's Clean Air Action Plan. A **neutral effect** is predicted.

7.8 Energy and Resources

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

Area policies

7.68 Policy S4 (Bloomsbury Campus Area) includes a commitment to delivering sustainable growth and upgrading the Bloomsbury decentralised energy network, which would likely have a positive effect against this objective. Otherwise, a neutral effect is predicted for the area policies against this SA objective, as the level of detail required to make any effect would be contained within site specific and topic specific policies.

Site allocation policies

7.69 The site allocations are generally neutral on energy and resources related objectives, instead highlighting key policies where relevant, such as CC2 Prioritising the Retention of existing buildings and CC3 Circular economy and reduction of waste. Site Allocation Policy S10 (Bangor Wharf and Eagle Wharf) however specifically mentions the reuse of existing granite setts to be reused onsite.

Topic specific policies

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

- CC1 (Responding to the Climate Emergency) sets out the Council's overarching strategy for addressing climate change to ensure that new development is designed to mitigate and adapt to climate change to respond to the climate emergency.
- CC2 (Prioritising the Retention of Existing Buildings) seeks to prioritise the retention of existing buildings over demolition, recognising the benefits of re-using materials in terms of limiting the carbon emissions associated with the extraction of raw materials.
- CC3 (Circular Economy and Reduction of Waste) seeks to ensure that development in Camden shifts towards a circular economy approach, which reduces waste; more efficiently uses resources, such as existing buildings, building materials, energy and water; and encourages flexibility, ease of maintenance and reparability in building design.
- CC4 (Minimizing Carbon Emissions) seeks to ensure that carbon emissions are minimised over the lifespan of a building and that embodied carbon is actively reduced to help respond to the climate emergency, using Whole Life Carbon Assessment and benchmarks to ensure developers consider all aspects of a building's life cycle at an early stage through to completion.
- CC5 (Sustainability Improvements to Existing Buildings) seeks to support improvements to existing buildings to make them more energy efficient and resilient to climate change.
- CC6 (Energy Use and the Generation of Renewable Energy) seeks to tackle the causes of climate change in the borough by ensuring that developments use less energy and maximise the generation of renewable energy on-site. It includes energy targets which aim to improve the delivery of net zero carbon buildings, through improved energy efficient design, low carbon heat, and generation of renewable energy.
- CC7 (Heat Networks) supports connections to existing and future heat networks.
- CC8 (Overheating and cooling) seeks to ensure buildings and spaces promote cooling and reduce reliance on more active measures such as air conditioning.
- CC9 (Water Efficiency) seeks to maximise water efficiency in new development to ensure adequate water supply and help respond to the climate emergency.

- Design policies D1 (Achieving Design Excellence), D3 (Design of Housing) D4 (Extensions and Alterations), and D5 (Historic Environment) support energy efficient development. Policy D6 (Basements) expects developers to reduce the upfront embodied carbon of basements.
- Transport policies - T1 (Safe, Healthy and Sustainable Transport), T4 (Shared Transport Infrastructure and Services), and T6 (Sustainable Movement of Goods, Services and Materials) support more sustainable modes of transport and the provision of EV charging points.

7.71 The main policy that could lead to negative effects against this SA objective is policy D2 (Tall Buildings). Whilst the construction of tall buildings can make efficient use of the limited land available, providing landmark buildings, they are known to be significantly higher in upfront embodied carbon and have limited availability to generate renewable energy from solar pv. To mitigate against this however, Policy D2 states that in considering applications for tall buildings the Council will consider whether the development delivers the highest standards of sustainable design and construction in line with Policy D1. Furthermore, Policy CC4 (Minimising carbon emissions) seeks to ensure buildings reduce whole life carbon emissions including embodied carbon as far as possible.

7.72 It should also be noted that the emphasis of policies in the Local Plan on addressing the Council's Climate and Ecological Emergency declaration, meeting the 2030 net zero target, and supporting the delivery of the Climate Action Plan have to be balanced against other plan priorities, namely the delivery of affordable housing. Whilst this could be a tension, it must also be considered alongside the provision of homes which are comfortable, healthy, and require less energy to run. In recognition of this issue policy CC6 Energy use and the generation of renewable energy has been updated to include the consideration of viability.

Conclusion

7.73 The Local Plan has a key role to play in delivering the actions within the Council's Climate Action Plan to help meet the borough's target to reach net zero by 2030.

7.74 A number of changes have been made to the climate change policies since the publication of the draft Local Plan, the most notable of which are:

- Combining all 'energy' related policy criteria into one policy for new and existing buildings. Using evidence supported targets for existing buildings.
- Having a clear policy on sustainability improvements to existing buildings (retrofitting).

7.75 **Moderate or uncertain positive effects** are predicted for this group of policies, which are likely to be realised in the medium to long term, with short term effects likely on smaller scale retrofit improvements.

7.9 Water

“To protect and manage water resources (including groundwater)”

Area policies

7.76 It is important that development in the borough prevents harm to the water environment, including groundwater sources. There is a groundwater source protection zone in the Central area, with designated secondary A aquifers within the North and South areas. The Regent’s Canal crosses the borough and falls within both the Central and South areas. The policies for South, Central, West and North Camden set out the overarching policy framework to guide development in these areas and a neutral effect against this objective is predicted. If development were to come forward here without site specific and topic specific policies to safeguard these resources however, a negative effect would be more likely.

Site allocation policies

7.77 Apart from sites which already benefit from planning permission, namely C24 52 – 54 Avenue Road and W12 100 Avenue Rd, there are no other proposed site allocations within the borough’s groundwater source protection zone area.

7.78 The following site allocations are located within secondary A aquifer areas and therefore policy NE4 (Water Quality) should be applied to avoid and / or mitigate any negative effects:

- S14 Land at Pakenham Street and Wren Street
- S16 Former Central St Martins College
- S17 Selkirk House
- S18 135 – 149 Shaftesbury Avenue
- S19 Cockpit Yard and Holborn Library
- S23 Tybalds Estate
- S24 294-295 High Holborn
- S25 156-164 Gray’s Inn Road
- S26 8 -10 Southampton Row
- S27 Middlesex Hospital Annex, 44 Cleveland Street
- S30 Birkbeck College, Malet Street
- S31 Senate House (NW quadrant), Malet Street
- S32 20 Russell Square
- W13 551-557 Finchley Road
- N3 Queen Mary’s House
- N4 Hampstead Delivery Office

7.79 Where site allocations are next to the Regents Canal, these will be expected to protect and enhance the water environment in accordance with development management policy NE4 (Water Quality). This applies to:

- S8 St Pancras Hospital;
- S10 Bangor and Eagle Wharf;
- C12 Gilbeys Yard; and
- C16 Shirley House.

Topic specific policies

7.80 The most relevant policy in the Local Plan in terms of water-related objectives is Policy NE4 (Water Quality). This policy seeks to ensure that development avoids the pollution of groundwater sources to protect the water environment and public health. The policy recognises that Camden has an inner and outer Groundwater Source Protection Zone, in addition to other areas that are designated as Secondary A aquifers.

7.81 London is classified by the Environment Agency as an area of serious water stress. Policies CC1 (Responding to the Climate Emergency), CC3 (Circular Economy and Reduction of Waste), CC5 (Sustainability improvements to existing buildings), and CC9 (Water Efficiency) have sought to ensure development in the borough uses water efficiently and reuses water where possible. These should have a positive effect, but effects are likely to be limited. A higher water efficiency target as suggested by the Environment Agency would increase positive effects; however, further evidence of the feasibility of a higher target has not been tested.

7.82 Policy A1 (Protecting Amenity) seeks to manage the impact of development on water and wastewater infrastructure and policies. CC11 (Sustainable Drainage), T1 (Safe, Healthy and Sustainable Drainage) and T2 (Prioritizing Walking, Cycling and Wheeling) promote the inclusion of sustainable drainage measures in developments, which should help manage water resources.

7.83 With regards to policies that potentially give rise to a tension with water objectives, there is a need to consider Policy D6 (Basements). However, this states 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

7.84 A key consideration against this SA objective is Camden’s Groundwater Source Protection Zone (inner and outer area), located within the southwest of Primrose Hill Park and a section of South Hampstead from Prince Albert Road to Swiss Cottage. Furthermore, areas around Hampstead Heath, Hampstead, Bloomsbury and Holborn

are designated as Secondary A Aquifers (which means they are capable of supporting local water supply). There are a number of development activities that can impact on groundwater, but it is not possible to conclude that the area policies and site allocations will lead to any effects providing policy NE4 (Water Quality) is applied. A **neutral effect** is predicted.

7.10 Climate Change Resilience

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

Area policies

7.85 Whilst Camden is in Flood Zone 1, there are areas in the borough which experience surface water flooding. Given this, the area policies for South, Central, West and North Camden seek to improve resilience through the inclusion of flood mitigation measures within the list of infrastructure priorities for these areas.

7.86 Furthermore, the GLA’s overheating map shows the South, Central, and West sub areas to be most at risk of overheating. Whilst the infrastructure priorities for these areas include open space provision and urban greening measures, which should assist with mitigating against overheating, given the strategic nature of these policies they do not directly address the issue of overheating, as this is covered by the relevant topic specific policies.

Site allocation policies

7.87 A key consideration when looking at resilience is flood risk. The following sites (many of which have planning permission) are identified as being at risk of flooding from either surface water (including sewer surcharge), and groundwater:

- S5 120 – 136 Camley Street
- S6 104-114 Camley Street
- S7 Parcelforce ATS Tyre
- S8 St Pancras Hospital
- S9 Shorebase Access
- S10 Eagle and Bangor Wharf
- S11 Former Royal National Throat, Nose and Ear Hospital
- S13 Former Thameslink Station
- S14 Land bounded by Pakenham and Wren Street
- S15 Land to the Rear of the British Library
- S17 Selkirk House
- S16 Former Central St Martins
- S18 135-149 Shaftesbury Avenue
- S19 - Cockpit Yard and Holborn Library

- C2 Regis Road and Holmes Road Depot
- C3 Murphy Site
- C5 369 – 377 Kentish Town Road
- C6 Kentish Town Fire Station
- C7 Morrisons Supermarket
- C8 Morrison’s Petrol Station
- C9 100 Chalk Farm Road
- C11 Network Rail land at Juniper Crescent
- C12 Gilbeys Yard
- C13 West Kentish Town Estate
- C15 Wendling and St Stephen’s Close
- C16 Shirley House
- C17 Camden Town over station development
- C18 109 Camden Road
- W2 O2 Centre, car park and showrooms, 14 Blackburn Road
- W6 Meridian House
- W8 88 - 92 Kilburn High Road North
- N2 Mansfield Bowling Club
- N3 Queen Marys House
- N4 Hampstead Delivery Office

7.88 Where site allocations are 1 hectare or more, and / or at risk of flooding, the submission of a Flood Risk Assessment is required. Furthermore, in accordance with Policy CC10 (Flood Risk) where sites are identified as being at risk from flooding, the Council will expect developments to be designed to be resilient to flooding and for applicants to set out how the risk of flooding will be mitigated over the lifetime of the development, without increasing flood risk elsewhere.

7.89 Another key consideration when looking at resilience is overheating. The main way that the site allocation policies should be able to alleviate overheating of the local environment is through the introduction of green spaces and trees in areas which are mostly hard landscaped at present. Sites where green space and urban greening measures are proposed are discussed under the open space and biodiversity objectives above. The introduction of Sustainable Drainage Systems (SuDS) on sites, as part of the wider open space provision should also lead to positive effects against this objective. Generally SuDS are a requirement through Policy CC11 (Sustainable drainage).

Topic specific policies

7.90 The effects of climate change in the borough are evident in the form of flood events, drought and overheating. These issues have an adverse impact on health and wellbeing, infrastructure, and economic activity. Policies CC1 (Responding to the climate emergency), CC5 (Sustainability improvements to existing buildings), CC8 (Overheating and cooling), CC10 (Flood risk), and CC11 (Sustainable drainage) in

the Local Plan have sought to ensure that future development in the borough is more resilient to the effects of climate change and existing residents and business are able to make changes to increase their resilience.

7.91 Key policies that are broadly supportive of resilience related objectives include the following:

- 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.
- CC5 (Sustainability Improvements to Existing Buildings) seeks to support improvements to existing buildings to make them more energy efficient and resilient to climate change. The policy supports the installation of external shading to reduce overheating risk and the installation of a green roofs.
- CC8 (Overheating and cooling) is an important policy as overheating is a key climate change risk to the borough, alongside flood risk. It seeks to resist applications that include active cooling (air conditioning) and non-essential mechanical plant and for all development to minimise the adverse impacts of overheating through the application of the London Plan cooling hierarchy. All applications will be required to demonstrate how the risk of overheating has been minimised and mitigated through design. This could potentially reduce the number of developments having to be retrofitted due to overheating in the future.
- 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.
- CC10 (Flood risk) sets out the Council's approach to managing flood risk. Camden is classified as being in Flood Zone 1 which signifies the lowest probability of flooding, as there are no main rivers within the borough. Given this flooding from surface water and sewer sources poses the greatest risk to flooding, and the risk is interconnected (due to combined sewers). The policy seeks to ensure that development in Camden does not increase flood risk and instead reduces it where possible
- CC11 (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.

7.92 Other policies which are likely to lead to a positive effect against this objective are SC4 (Open Space), NE1 (Natural Environment), D1 (Achieving Design Excellence), D3 (Design of Housing), D5 (Historic Environment), T1 (Safe, Healthy and Sustainable Transport), T2 (Prioritising Walking, Cycling and Wheeling) and T5 (Parking and Car-free Development). These policies either support the protection or provision of green spaces, and/or the delivery of urban greening measures.

- 7.93 It should however be noted that there is a potential tension with the SA objective for resilience and the need to make the most efficient use of land for development in the borough. Optimising the limited land available in Camden for the development of new buildings has the potential to reduce the land available for multi-functional sustainable drainage systems. This tension is potentially negated through Policy CC11 (Sustainable drainage) which requires developers to meet a greenfield runoff rate following the drainage hierarchy.
- 7.94 Other tensions exist with the SA objective and heritage, these are noted under 'Heritage' below.

Conclusion

- 7.95 In conclusion, whilst the Plan could have a positive effect against this objective given that the approach taken seeks to embed climate resilience into policy the degree of this effect is unknown and as such a **neutral effect** is predicted.

7.11 Design

“To promote high quality and sustainable urban design”

Area policies

- 7.96 The policies for South, Central, West and North Camden set out the Council's aspirations for those areas to ensure that development delivers a range of social, economic and environmental benefits, which are intrinsically linked to good design.
- 7.97 The policy for the Euston Area states that development at Euston is expected to be of excellent design and, as such, is likely to have positive effect on this SA objective. The Bloomsbury Campus Area policy includes a number of criteria to guide the design of spaces and buildings to promote inclusivity, which is likely to have a positive effect against the SA objective for Design.

Site allocation policies

- 7.98 The site allocation policies seek to ensure that new development responds to existing character and context, with the aim promoting high quality design, which is likely to have a positive effect against this SA objective.
- 7.99 The Plan also responds to the issue of building heights and tall buildings. It is well established through the Local Plan 2017 (and previous plans) 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 commissioned a Building Heights Study. The findings of the study are reflected in site allocation policies, which identify sites

where tall buildings may be an appropriate form of development and set out indicative height ranges to guide future development, subject to compliance with other policies in the Plan. Sites that have been identified as being potentially suitable for tall buildings are:

- S5 120 - 136 Camley Street
- S6 104 - 114 Camley Street and Cedar Way Industrial Estate
- S7 24-28 Royal College Street (Parcelforce and ATS Tyre site)
- S8 St Pancras Hospital
- S17 Selkirk house
- S20 York Way Depot and adjacent land at Freight Lane
- C2 Regis Road and Holmes Road Depot
- C3 Murphy Site
- C7 Morrisons Supermarket
- C10 Juniper Crescent
- C11 Network Rail land at Juniper Crescent
- C13 West Kentish Town Estate
- C15 Wendling Estate and St Stephens Close
- C23 Former Flats 121 – 129 Bacton, Haverstock Road
- W2 O2 Centre, car park, showrooms and 14 Blackburn Rd
- W12 100 Avenue Road

Topic specific policies

7.100 No policies are considered to give rise to tensions with this objective. Key policies that are supportive of design objectives include:

- DS1 (Delivering Healthy and Sustainable Development) sets out the overarching strategy to guide new development in Camden and 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.
- 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 wellbeing of our communities and celebrate Camden's diversity of people and place.
- 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.

- D5 (Historic Environment) expects that development not only conserves, but also takes opportunities to enhance, or better reveal, the significance of heritage assets and their settings. It also supports heritage-led regeneration schemes and ensures that the local historic environment is at the heart of place making.
- 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, and expects new frontages to be well-designed and respond to positive examples in the local street scene in terms of proportion and local impact.
- A2 (Safety and Security) aims to create a safe and secure environment and provide a sense of security for all users, to support good health and wellbeing and promote inclusion. The policy sets out a number of criteria to guide the design of developments to create a safer borough for all.
- Policies H1 (Maximising Housing Supply), SC1 (Improving Health and Wellbeing), SC2 (Access for All), SC4 (Open Space) and T1 (Safe, Healthy and Sustainable Transport) are also likely to lead to positive effects against this objective.

7.101 The SA objective for design also takes into account sustainable design and construction methods. Therefore, it is considered that policies CC1 (Responding to the climate emergency), CC3 (Circular economy and reduction of waste), CC4 (Minimising carbon emissions), CC5 (Sustainability Improvements to existing buildings) and CC6 (Energy use and the generation of renewable energy, will also have a positive effect on this objective, given they promote the reuse of existing materials, designing buildings for multiple uses, using lower embodied carbon materials, and buildings that require less energy to occupy them.

Conclusion

7.102 The Plan includes a number of policies which promote high quality and sustainable design, which should lead to a positive effect against this SA objective. Whilst it is recognised that the impacts associated with tall buildings can be positive or negative, it is considered that the policy in the Plan includes sufficient provisions which seek to mitigate any potential adverse effects.

7.103 In conclusion **limited or uncertain positive effects** are predicted.

7.12 Historic environment

“To protect and enhance the historic environment”

Area policies

7.104 Camden has a rich architectural heritage covering much of the borough. The policies for the South, Central, West and North Camden set out the overarching policy framework to guide development in these areas, and should be read in conjunction with topic specific policies, which provide more detail on matters such as the historic environment. The policy for North Camden states that development in the North of the borough will be expected to preserve and, where appropriate, enhance the historic character of the area. The Bloomsbury Campus Area policy captures the need to preserve and enhance the historic context of the local area, which should lead to positive effects against this objective.

Site allocation policies

7.105 The site allocation policies have sought to identify heritage assets, on site and adjacent to the site. Where designated and non-designated heritage assets are located in close proximity to site allocations, these will be conserved by Policy D5 (Historic Environment) which seeks to mitigate any effect on the historic environment.

7.106 Site allocations (not including the sites in the tables at the end of the area chapters, which are generally already subject to planning permission) within a Conservation Area (CA), or in close proximity to Locally listed and Listed buildings are set out below:

- S7 24-28 Royal College Street (Parcelforce and ATS Tyre Site) – next to Grade II Listed terrace 6 – 22 and 75 – 85 Royal College Street, in addition to locally listed buildings on Royal College Street.
- S8 St. Pancras Hospital – in proximity to Grade II Listed St Pancras Coroners Court, Grade II* and Grade II Listed buildings and structures within St Pancras Gardens. Kings Cross St Pancras CA.
- S9 Shorebase Access - is directly south of St Pancras Old Church and Gardens. Kings Cross St Pancras CA.
- S10 Bangor and Eagle Wharf – adjacent Locally listed buildings on Royal College Street. Grade II listed terrace 165-181. Regents Canal CA.
- S11 Former Royal National Throat, Nose and Ear Hospital – bounded by a number of Grade II Listed buildings on Wicklow Street and Swinton Street. Kings Cross St Pancras CA.
- S12 Belgrove House – Grade II Listed buildings on Belgrove Street and Crestfield Street. In proximity to Grade I Listed Kings Cross Station, St Pancras Station and Midland Hotel. Kings Cross St Pancras CA.
- S13 Former Thameslink Station, Pentonville Road – adjacent Grade II Listed Big Chill and Willing House. Kings Cross St Pancras CA.
- S14 Land at Pakenham Street and Wren Street – near Grade II listed building on Pakenham and Wren Street.

- S15 Land to the rear of the British Library – Grade I Listed British Library and St Pancras Station, Grade II Listed Levita House.
- S16 Former Central St Martins College – includes Grade II* Listed college building, and Grade II Listed buildings on Fisher Street and Southampton. Kingsway CA.
- S17 Selkirk House – includes Grade II listed buildings on Museum Street, next to Grade II Listed Buildings on West Central Street and Grape Street. Bloomsbury CA.
- S18 135-149 Shaftesbury Avenue – is Grade II Listed.
- S19 Cockpit Yard and Holborn Library – next to Grade II* Listed 3 – 16 Great James Street, and Grade II Listed Buildings on Northington and John Street. Bloomsbury CA.
- C2 Regis Road – in proximity to Grade II Listed Buildings (87 Kentish Town Centre, 12A Police Station). There are also Locally Listed buildings in close proximity, along Holmes Road).
- C3 Murphy – next to Grade II Listed Buildings ‘The Forum’, 1-7 Highgate Road, 23 Christ Apostolic Church. The site includes Locally Listed Building 81a Highgate Road).
- C4 Kentish Town Police Station - 12A Police Station and attached railings and lamp.
- C6 Kentish Town Fire Station – opposite Grade II Listed Christ Apostolic Church, and next to Locally Listed 11 – 15 Fortess Road.
- C7 Morrisons Supermarket and C12 Gilbeys Yard – next to Grade II* Winding Engine House, Grade II Listed ‘The Interchange’ and Gilbey House.
- C8 Former Morrisons Petrol Filling Station – next to Grade II* Stables Market. Regents Canal CA.
- C9 100 Chalk Farm Road - Grade II* listed Roundhouse building is located immediately adjacent to the site and there is a Grade II listed cattle trough to the front of the site. Regents Canal CA.
- C10 Juniper Crescent and C11 Network Rail land at Juniper Crescent – in proximity to Grade II* Listed Roundhouse.
- C12 Gilbeys Yard – Regents Canal CA.
- C13 West Kentish Town Estate – in proximity to Grade II Listed Rhyl Primary School and Nursery, and locally listed buildings 61a, 73,149 Grafton Road.
- C14 Hawkridge House – in proximity to Local list site 84 Warden Road.
- C15 Wendling Estate and St Stephens Close and C23 Former flats 121-129 Bacton, Haverstock Road - St Martin’s Church in proximity to the site is Grade I Listed and Grade II Listed St Martins Church Hall, Grade II* Roman Catholic Priory Church of St Dominic and Grade II St Dominic’s Priory, Grade II Dunboyne Road Estate, and locally listed 1-17 Southampton Road.
- C16 Shirley House – adjacent to Grade II Listed 17-21 Camden Road, 18 – 62 Camden Road. Locally listed 64 – 72 Camden Road. Regents Canal CA.
- C17 Camden Town over station development – Locally listed Hawley Infant School is within the site boundary. Camden Town CA.
- C18 UCL Camden Campus, 109 Camden Road – Rochester CA.

- C19 Arlington Road former depot site – near Grade II Listed Arlington House, 30 – 35 Gloucester Crescent, and 24 – 28 Oval Road. Locally listed buildings on Jamestown Road.
- W2 O2 Centre, car park, car showrooms and 14 Blackburn Road – Locally listed terraced group next to the site along Finchley Road.
- W6 Land to the rear of Meridian House – Locally listed terrace adjacent, 289 to 315 and 164 to 200 Finchley Road. Redington Frogna CA.
- W7 Gondar Gardens Reservoir (site and adjacent buildings Gondar Gardens) – the reservoir is locally listed.
- W8 88-92 Kilburn High Road – West End Lane is locally listed.
- W5 188-190 Iverson Road –202 to 220 Iverson Road is locally listed.
- N2 Mansfield Bowling Club – Dartmouth Park CA.
- N3 Queen Marys House - Grade II Listed telephone kiosks, and grouping of Grade II Listed Buildings south of the site. Hampstead CA.
- N4 Hampstead Delivery Office – Fitzjohns Netherhall CA.

7.107 Given the safeguards in the Plan that seek to prevent any negative effects on the historic environment, a neutral effect is predicted against this SA objective for the site allocation policies.

Topic specific policies

7.108 The key policy that is supportive of the SA historic environment objectives is Policy D5 (Historic Environment). This sets out a number of important policy considerations, which seek to:

- Support heritage-led regeneration schemes and ensure that the local historic environment is at the heart of place making to maintain the unique character of our heritage assets and deliver high quality new buildings and spaces which enhance their settings.
- Protect non-designated heritage assets 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.
- Support sustainability improvements to designated heritage assets.
- Ensure any works to a listed building are carried out in an appropriate manner, informed by suitably qualified heritage consultants, architects and contractors.

7.109 Other policies which are likely to lead to a positive effect against this objective, include:

- Policy SC4 (Open Space) which seeks to conserve and enhance the heritage value of designated open spaces and other elements of open space that make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets.

- Policy SC7 (Public Houses) seeks to protect public houses which are of community, heritage or townscape value.
- D4 (Extensions and Alterations) states that roof extensions, including mansard roofs, will be supported in principle where they do not adversely impact on designated heritage assets or their setting in accordance with Policy D5 (Historic Environment).
- D8 (Shopfronts) and IE6 (Supporting Designated Centres and Essential Services) seek to protect shopfronts of historic merit.

7.110 Potential tensions with this objective have been identified in relation to the following policies which could lead to uncertain effects against this objective, including:

- Policy D2 (Tall Buildings), however it should be noted that this policy seeks to mitigate any potential adverse effects on the historic environment. Here the policy states that in considering applications for tall buildings the Council will give particular attention to the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets in accordance with Policy D5 (Historic Environment); and
- Policies relating to energy efficient improvements of existing buildings (namely CC5 and CC6). Retrofit improvements to reduce energy use or increase resilience to overheating or flooding can have positive effects in ensuring the long term use of historic buildings and the comfort of occupants, however some alterations may have a negative effect. The Local Plan advocates a whole house approach to retrofit to ensure that negative risks are considered and mitigated and that proposals are in accordance with the historic environment policy. The effects of these policies on this SA objective are therefore considered to be 'uncertain'.

Conclusion

7.111 In conclusion, whilst it is acknowledged there is some potential for conflict with this SA objective and other policies in the Local Plan, given national policy and the Plan's support to enhance and improve heritage in the borough overall a **neutral effect** is predicted against the SA objective for heritage.

7.13 Land

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

Area policies

7.112 The policies for South, Central, West and North Camden and the Euston Area set out the overarching strategy to support the delivery of new homes and jobs in these areas, to ensure that new development makes efficient use of Camden's limited

land. Due to the very nature of the borough almost all development is expected on previously developed land.

Site allocation policies

- 7.113 All site allocations have sought to make the most efficient use of land and buildings available in accordance with established policy.
- 7.114 Sites which are currently vacant or occupied by lower density development and/or car parks are likely to have the most significant positive effects against this objective. These include:
- S5 120-136 Camley Street;
 - S6 104-114 Camley Street and Cedar Way Industrial Estate;
 - S7 24-28 Royal College Street;
 - S9 Shorebase Access;
 - S20 York Way Depot and adjacent land at Freight Lane;
 - C2 Regis Road and Holmes Road Depot;
 - C3 Murphy Site;
 - C7 Morrisons Supermarket;
 - C8 Former Morrisons Petrol Filling Station;
 - C11 Network Rail land at Juniper Crescent; and
 - W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road.

Topic specific policies

- 7.115 Key policies that are broadly supportive of objectives relating to the efficient use of land include the following:
- 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 and garages for alternative uses, and requires applicants to reduce on-site parking, as far as possible.
 - Policies CC1 (Responding to the Climate Emergency) and CC2 (Prioritising the Retention of Existing Buildings) seek to ensure that development makes the best use of a site and existing buildings. The approach taken in policy CC2 requires developers to review the condition of existing buildings on a site which also takes account of optimising site capacity.

- IE1 (Growing a successful and inclusive economy) and IE3 (Industry) encourage joint working with landowners and developers to bring forward comprehensive mixed-use regeneration proposals that provide for the intensification of under-utilised sites/land to deliver employment uses and other priority uses.
- D2 (Tall Buildings) and D6 (Basements) both support the objective of making the most efficient use of land available, as do housing policies H1 (Maximising Housing Supply), H2 (Maximising the supply of self-contained housing from mixed use schemes) and H5 (Protecting and improving affordable housing).

Potential tensions with this objective have been identified in relation to the following policies which could lead to uncertain effects against this objective, including:

- Policy CC2 (Retention of Existing Buildings) which seeks to prioritise the retention of existing buildings, could result in land being used less efficiently in Camden. However to mitigate against this the policy in the Local Plan Proposed Submission Draft has been updated to state that *“The Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council’s satisfaction that: the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and **optimises site capacity.**”*
- Policy D5 (Historic Environment) which seeks to protect and conserve heritage assets in Camden, could also result in land being used less efficiently. However to mitigate against this the policy in the Local Plan Proposed Submission Draft has been updated to state that the Council will *“Support heritage-led regeneration schemes and ensure that the local historic environment is at the heart of place making to maintain the unique character of our heritage assets and deliver high quality new buildings and spaces which enhance their settings.”*

Conclusion

7.116 In conclusion, taking into account the area policies, site allocation policies and topic specific policies in the Plan that seek to ensure that new development makes efficient use of Camden’s limited land, a **limited or uncertain positive effect** is predicted.

7.14 Economy and Employment

“To encourage and accommodate sustainable economic growth and employment opportunities”

Area policies

7.117 The policies for South, Central, West and North Camden and the Euston Area set out the overarching strategy to support the delivery of new employment floorspace

and manage and protect existing employment floorspace in these areas, which should have a positive effect against this objective. Furthermore, the Euston Area policy supports the creation and retention of suitable employment floorspace for research, learning and knowledge-based uses; and the Bloomsbury Campus Area policy supports this area to maintain and expand its role as the heart of higher education in Camden, which helps to create employment opportunities in this area.

7.118 The Hatton Garden Jewellery Industry Area policy (S2) also seeks to protect this nationally important centre for jewellery manufacturing and trading from other development pressure, which is key to ensuring its continued existence.

Site allocation policies

7.119 The majority of site allocations in the Plan are allocated to deliver a mix of uses including new homes and employment floorspace, reflecting the nature and location of the proposed allocations, particularly those within the Central Activities Zone and Knowledge Quarter.

7.120 Where sites have an existing employment use, the plan seeks to allocate them to also deliver housing to help meet housing need, whilst also seeking to intensify the existing employment use and provide a better range of workspace to meet local economic needs. These sites are discussed in more detail below:

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 (S5 and S6). The site allocation policies reflect the Council's adopted Canalside to Camley Street Supplementary Planning Document, which envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance. The sites are allocated to deliver employment, including research and knowledge-based uses, light industrial, maker spaces and offices. These sites seek to make the most effective use of land available and deliver significant positive effects for economy and employment SA objectives.
- Other employment-led site allocations which seek to intensify employment uses or ensure no net loss of existing employment include: S7 24-28 Royal College Street (Parcelforce and ATS Tyre Site); S8 St Pancras Hospital; S10 Bangor Wharf and Eagle Wharf; S11 Former Royal National Throat, Nose and Ear

Hospital; S12 Belgrove House; S13 Former Thameslink Station, Pentonville Road; S14 Land at Packerham St and Wren St; S15 Land to the rear of the British Library; S16 Former Central St Martins College; S17 Selkirk House; S18 135- 149 Shaftesbury Avenue; S19 Cockpit Yard and Holborn Library; S20 York Way Depot and adjacent land Freight Lane; and S30, S31 and S32 which are allocated for higher education uses.

Central sub area

- The main sites proposed for allocation in Kentish Town (C2 Regis Road and Holmes Road Depot, and C3 Murphy Site) are largely industrial and low density in character. The opportunity for redevelopment and intensification of employment in this area was identified in the Camden Local Plan 2017. Since the adoption of the Local Plan, the London Plan 2021 has been adopted, and includes policy E7 'Industrial intensification, co-location and substitution'. Local Plan Policy IE3 (Industry) seeks to manage and protect the supply of industrial and warehousing land, while recognising the opportunity for some larger sites to be used more efficiently to deliver wider Local Plan objectives in line with the London Plan policy.
- Other site allocations in the Central sub area capable of delivering employment opportunities include the Morrisons Supermarket site and former Morrisons Petrol Filling Station (C7 and C8), which together are expected to deliver a significant number of homes and provide retail and employment premises, and C9 100 Chalk Farm Road and C17 Camden Town over station development.
- The only site allocation in this area that would have a negative impact on this SA objective is C16 Shirley House. This site is currently in use as offices, but is allocated to deliver student accommodation to help meet the identified need.

West sub area

- The most significant site in terms of delivering jobs, homes, and infrastructure in the west sub area of Camden is the O2 Centre (W2). The site is currently occupied by leisure, retail, and car parking. The site allocation seeks to make the most efficient use of land and buildings through the delivery of a significant number of new homes and employment, health, and town centre uses.

North sub area

- The north sub area only has three site allocations, and none are allocated to deliver employment floorspace. The allocation of N4 Hampstead Delivery Office to deliver new homes will result in the loss of employment floorspace in favour of the plan's priority land use. Although this does not involve a large amount of floorspace, a negative effect has been predicted.

7.121 Overall, the Plan seeks to make the most efficient use of land and buildings by intensifying existing employment sites to help deliver new homes and other community benefits. This is also reflected in 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 the lifetime of the Plan.

Topic specific policies

7.122 Key policies that are broadly supportive of economy / employment objectives include the following:

- 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.
- IE4 (Affordable workspace) 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 Designated Centres and Essential Services) 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.

7.123 Potential tensions with this objective have however been identified in relation to the following policies which could lead to uncertain effects against this objective:

- 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;
- 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, for example housing;
- Policy H1 (Maximising housing supply), which sets out the Council's strategy for maximising housing supply and states that self-contained housing is the priority land use in the Plan; and
- Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) which seeks to maximise the delivery of homes from large non-residential schemes within a defined area.

Conclusion

7.124 In conclusion, taking into account the spatial strategy alongside site-specific and area-wide development management 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.

7.15 Centres

“To ensure our designated centres remain sustainable and adaptable for the future”

Area policies

7.125 The policies for South, Central, West and North Camden aim to support and protect Camden's designated centres, in addition to setting out where new retail development should be focussed within these areas, which should have a positive effect against this SA objective. The South Camden policy also highlights the importance of the evening and night time economy in this area, and states that the Council will support efforts to widen the range of evening and night-time economy uses in the CAZ retail clusters, particularly where this will benefit local residents and people working night shifts, in line with the objectives set out in the Council's Evening and Night-time Economy Strategy. Whilst this may lead to tension with the amenity objective, it is considered that sufficient mitigation has been built into other policies in the Plan to deal with this.

Site allocation policies

7.126 Site allocations in or near to designated local centres are likely to have indirect positive effects as the increased activity in these areas should help support their continued operation. Key site allocations (not including the sites in the tables at the end of the area chapters, which are generally already subject to planning permission) that are broadly supportive of designated retail centres objectives include:

- S18 135-149 Shaftesbury Avenue – the allocated use (theatre, cinema, cultural) would support the Tottenham Court Road CAZ retail cluster and Covent Garden specialist centre.
- C2 Regis Road and C3 Murphy – strategic sites next to Kentish Town Centre. The proportion of development in this area is considered to have a significant positive effect on the continued operation of the town centre, provided that any retail uses included within the site allocation do not compete with the main services provided in the town centre.
- C7 Morrisons Supermarket – the supermarket provided a key service for the local community, and supported linked shopping trips to Camden Town Centre. The

site allocation makes the most efficient use of land by re-providing the supermarket, supporting town centre uses, and the provision of homes.

- C17 Camden Town over station development – the site is within the Town Centre and is allocated for mixed use development to deliver station capacity upgrades, a new station entrance, new homes, employment uses, and retail and food and drink uses, which would help to maintain the vitality of Camden Town town centre.
- W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road – this is within the Finchley Road / Swiss Cottage Town Centre and the site allocation should help to sustain the vitality of the Centre.
- W8 88 – 92 Kilburn High Road – the site allocation is within Kilburn Town Centre and is allocated to provide new homes and retail.

Topic specific policies

7.127 Key policies that are broadly supportive of designated centres objectives include the following:

- IE6 (Supporting Designated Centres and Essential Services) 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.
- IE2 (Offices) seeks to ensure that where office/mixed-use schemes are located within an established retail frontage, active uses are provided at ground floor.
- IE5 (Hotels and Visitor Accommodation) supports smaller and medium-sized hotels and visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road / Swiss Cottage, and in locations with an established commercial or mixed-use character in the Central Activities Zone.
- IE10 (Markets) seeks to promote and protect markets having regard to their distinctive social and economic character and role and ability to meet the needs of the local community and visitors.
- SC7 (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.
- D8 (Shopfronts).

7.128 Potential tensions with this objective have been identified in relation to the following policies which could lead to uncertain effects against this objective, including:

- Policies IE7 (Hot Food Takeaways) and IE8 (Gambling Uses), which seek to restrict these uses in Camden's designated centres to protect public health; and
- Policy A2 (Safety and Security), which seeks to address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres, and ensure Camden's businesses and organisations providing

food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design.

Conclusion

7.129 After having accounted for the spatial strategy alongside the proposed suite of topic specific 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 considered appropriate to predict a **limited or uncertain positive effect**.

7.16 Total, Cumulative, and Synergistic Effects

7.130 As part of the SA/SEA there is a requirement to consider 'cumulative effects', that is, effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. Cumulative effects arise, for instance, where several individual policies and sites have a combined effect on an objective, or where several policies and sites each have insignificant effects but together have a significant effect.

7.131 The significance of cumulative effects resulting from a range of activities, or multiple incidences of one activity, may vary based on factors such as the nature of the proposed sites and policies and the sensitivity of the receiving communities and environment. Table 7.1 appraises the Local Plan policies for potential cumulative effects.

7.132 This also provides an opportunity to discuss potential long term and 'larger than local' effects, in addition to external factors like market forces. For Camden, this primarily translates as a need to consider the implications of the Local Plan for other London Boroughs, for sectors of London (e.g. the CAZ) and for London as a whole. In this respect, the Council has taken into account consultation responses received from the Greater London Authority and the London Borough of Islington, in addition to matters raised through duty to co-operate meetings with neighbouring boroughs. As well as the larger-than-local Housing Market Area (HMA) within which Camden is located, and the Functional Economic Market Area (FEMA) in which Camden is positioned. It should however be noted that the imminent review of the London Plan will distribute housing and employment growth across all London boroughs, accounting for infrastructure and other factors.

Table 7.1 Cumulative effects of the Local plan

SA Objective	Cumulative effects
<p>1. Homes</p>	<p>The Local Plan has a key role in maximising housing supply. However, there is a limited availability of land and house prices remain high. In recent years investors in Camden have tended to target life sciences, knowledge-based uses and hotels, which have higher returns on investment, meaning that site allocations in the Local Plan are key to supporting housing delivery.</p> <p>Uncertain effect.</p>
<p>2. Health</p>	<p>Health and wellbeing are a key focus of the Local Plan, which has been bolstered by the Health Impact Assessment.</p> <p>There is a potential for negative cumulative effects to result if multiple housing developments were to come forward, potentially causing increased demand for, and strain on, existing community and health facilities. The Council has regular meetings with the North Central London Integrated Care Board to identify the impacts of development on local health and social care services. This allows for the early planning of any mitigation measures required. The Infrastructure Delivery Plan will outline the main projects in Camden to enhance facilities and services to support planned growth.</p> <p>Site allocation policies and topic specific policies focused on community infrastructure include the provision of new community facilities and services.</p> <p>Positive effect.</p>
<p>3. Equality</p>	<p>There are wide disparities between deprived and affluent areas in Camden. The focus on reducing inequality in the Local Plan and ensuring development delivers positive outcomes should counterbalance any negative effect from increased population pressure on services and facilities.</p> <p>Positive effect.</p>
<p>4. Amenity</p>	<p>There are tensions between policies on amenity and the potential for medium term negative effects associated with the delivery of the site allocations, particularly where a number of site allocations come forward for development at the same time. These effects are not permanent however.</p> <p>The intensification of employment sites and provision of homes has potential to give rise to negative effects within sites and</p>

SA Objective	Cumulative effects
	surrounding neighbourhoods. However, as mitigation will be required, it is fair to assume an uncertain effect.
5. Open space	<p>There is limited land available for open space in the borough. Strategic sites in the West, Central, and South areas have the most potential to deliver public open space, which are the areas shown to have most deficiency.</p> <p>Positive effect.</p>
6. Biodiversity	<p>The Council declared a Climate and Ecological emergency in 2019. There is potential for short term negative effects on the natural environment and biodiversity from general construction disturbance, if multiple developments were to come forward at the same time, in close proximity to protected sites for nature conservation. A number of strategic site allocations are in close proximity to protected Sites of Importance for Nature Conservation. These site allocations include requirements to protect and enhance biodiversity, so in the longer term could have a more positive effect.</p> <p>Limited or uncertain positive effect.</p>
7. Air quality	<p>Short-term and long-term exposure to polluted air is known to cause and contribute to health conditions including respiratory (breathing) and cardiovascular (heart) illnesses. The Council has committed to World Health Organisation (WHO) air quality standards and our Clean Air Action Plan sets out our strategy for creating a borough in which no one suffers ill-health as a result of the air they breathe.</p> <p>Whilst development proposed in the Local Plan will inevitably give rise to polluting activities such as those associated with the construction and operation of buildings, strategic sites allocations, climate, and transport policies have sought to mitigate against this, to help reduce air pollution in the borough.</p> <p>Neutral effect.</p>
8. Energy	<p>The Council declared a climate and ecological emergency in 2019 and set out its ambition to be net zero carbon by 2030.</p> <p>The Local Plan Proposed Submission Draft has sought to strengthen the current approach with detailed topic specific policies aimed at reducing emissions from new and existing development, a focus on maximising the generation of renewable energy, ensuring the efficient use and reuse of</p>

SA Objective	Cumulative effects
	<p>resources, and a focus on building resilience to overheating and flooding.</p> <p>While the spatial strategy will inevitably give rise to increased emissions from any deconstruction, construction, and operation of buildings, the proposed approach will be an improvement on the baseline.</p> <p>Limited or uncertain positive effect.</p>
9. Water	<p>The borough has groundwater Source Protection Zones 1 and 2, and Secondary A aquifers. Policies have sought to clarify development activities which could have an impact on groundwater sources and the necessary assessments required to mitigate this. Providing the policy is applied no cumulative effects are predicted.</p>
10. Resilience	<p>There are areas in the borough that are at greater risk to surface water flooding and this risk is likely to increase in intensity and frequency as a result of climate change. Notwithstanding mitigation proposed to ensure that development will not increase the risk of flooding elsewhere, development proposed in the borough will result in more people in these areas at risk of flooding.</p> <p>There is limited land available to provide large scale Sustainable Drainage Systems, such as those found in areas outside an inner London borough, nonetheless the impact of strategic site allocations in reducing surface water runoff from previously developed sites will likely have a limited positive effect.</p> <p>The London Resilience Review reported that in 2022 there were 3,271 heat related deaths in England and 387 in London. Climate change is likely to increase the frequency of heat waves. Strategic site allocations and topic specific policies have a significant role in ensuring that buildings and the spaces between buildings are naturally cool.</p> <p>The Plan alone is likely to have a limited positive effect, but collectively with other plans and programmes, may help to increase resilience in the borough and London, and a more positive effect may in time be realised.</p>
11. Design	<p>The Plan includes a number of policies which promote high quality and sustainable design. The Plan also emphasises the importance of celebrating and reflecting the diversity of the</p>

SA Objective	Cumulative effects
	<p>borough's communities in the design of spaces and places, in line with the Council's Diversity in the Public Realm Strategy.</p> <p>Site allocations which seek to improve the townscape and increase permeability are likely to give rise to cumulative positive effects within the borough.</p>
12. Heritage	<p>The borough has a significant proportion of designated and non-designated heritage assets. The Local Plan Proposed Submission draft seeks to ensure that these heritage assets are protected and enhanced. The borough is considered sensitive to the development of tall buildings and as a result policy has been developed in accordance with the London Plan which includes consideration of a buildings surroundings and whether the proposal preserves or enhances the historic environment and heritage assets.</p> <p>Neutral effect.</p>
13. Land	<p>Camden is an inner London borough with limited availability of land. Most site allocations have been previously developed and in light of the development needs outlined in the spatial strategy it is vital sites optimise development capacity in accordance with the London Plan.</p> <p>Collectively the site allocations and topic specific policies will likely deliver positive effects.</p>
14. Economy	<p>The Local Plan should serve to support Camden's role as one of the most important business locations in the country. The Plan also includes policies to support the Council's Affordable Workspace Strategy and Evening and Nighttime Economy Strategy.</p> <p>The economic policies of neighbouring central London boroughs and the influence of the London Plan provides further potential for greater positive cumulative effects.</p>
15. Centres	<p>Policies in the Local Plan seek to ensure the borough's designated centres remain active and vibrant places. These work with Council programmes to support Camden's high streets and the evening and night time economy.</p> <p>Site allocations in close proximity to designated centres include criteria to ensure they do not detract and instead provide complementary uses.</p> <p>Limited or uncertain positive effect.</p>

7.17 Conclusion

- 7.133 The proposed policies in the new Local Plan have continued to evolve throughout the sustainability appraisal process and have been updated to reflect SA recommendations, including minor wording changes, to ensure consistency across the policies, mitigation of any negative effects, and conformity with the NPPF and the London Plan.
- 7.134 The sustainability appraisal process has been useful in identifying areas of the Plan which could be further improved in relation to SA objectives and criteria. The following changes have been made:
- Ensuring that where sites are capable, they help to provide homes for specific needs;
 - Improving walking and cycling routes;
 - Ensuring the protection of water sources;
 - Ensuring amenity is not unduly impacted or existing employment uses are impacted by 'Agent of change';
 - Increased social value of strategic sites in areas of need; and
 - Protection and enhancement of biodiversity. Sites near SINC's have been reviewed to ensure they include measures to enhance biodiversity and create green links where feasible.
- 7.135 The appraisal of the Local Plan has concluded broadly positive effects with no negative effects predicted, although a number of tensions between the Local Plan and sustainability objectives have been identified.
- 7.136 Some significant positive effects have been identified. In other cases, both positive effects and negative effects have been identified against an SA objective, and an overall 'neutral' effect has been recorded. Furthermore, in some cases the Plan will clearly result in an improvement on the baseline situation, but this needs to be balanced against other relevant objectives and targets (for example, housing targets and the Council's net zero carbon target). This may limit the Plan's ability to deliver significant positive effects against some SA objectives.

Chapter 8 - Monitoring

8.1 The SEA Regulations require that “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”.

8.2 Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures are proposed in this SA Report in relation to all of the SA objectives in the SA framework. As the Local Plan is implemented and the likely significant effects become more certain, the Council may narrow down the monitoring framework to focus on those effects of the Local Plan likely to be significantly adverse.

8.3 Table 8.1 sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Local Plan, which draw on existing monitoring arrangements.

Table 8.1 – Monitoring Indicators

Ref.	SA objective	Monitoring Indicators
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> • Gross / net additional housing completions • Gross / net affordable housing completions • Financial contributions secured in lieu of affordable housing • Gross / net student accommodation completions • Gross / net older persons housing / hostels / homes for vulnerable people • Percentage of total housing units that are intermediate/social rented/market housing • Housing size (no. of beds) for market/social rented housing • Percentage of new homes built to comply with Part M4(3) of the Building Regulations

Ref.	SA objective	Monitoring Indicators
		<ul style="list-style-type: none"> • Net additional pitches for Gypsies and Travellers
2	To promote a healthy community	<ul style="list-style-type: none"> • Life expectancy • Obesity rates in adults and children • Delivery of food growing spaces/allotments in sqm • Planning applications for fast hot food takeaways and net change
3	To tackle poverty and social exclusion and promote equal opportunities	<ul style="list-style-type: none"> • Employment / unemployment rate in the Borough • Changes in the Index of Multiple Deprivation • S.106 contributions for public transport, leisure services, education, health and community services • Apprenticeships secured through S106
4	To improve amenity by minimising the impacts associated with development	<ul style="list-style-type: none"> • Air quality – average air pollutant levels • Number of Construction Management Plans
5	To conserve and improve open space provision	<ul style="list-style-type: none"> • Net change in open space provision
6	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<ul style="list-style-type: none"> • Progress against Biodiversity Action Plan targets • Changes to biodiversity status of SINCs • Losses / gains in areas of biodiversity importance
7	To improve local air quality and limit exposure	<ul style="list-style-type: none"> • Air quality – average air pollutant levels • % of journeys to work by public transport or active travel • Delivery of shared transport projects • Progress against Clean Air Action Plan targets
8	To promote the efficient use of energy, water and other natural resources, throughout the life of the development	<ul style="list-style-type: none"> • Proportion of materials reused/reclaimed over new materials in major developments • Percentage of schemes meeting the GLA's aspirational Whole Life Carbon benchmarks • New or decarbonised heat networks

Ref.	SA objective	Monitoring Indicators
		<ul style="list-style-type: none"> • Proportion of new development meeting an energy balance without offsetting (net zero in operation) • Energy offset secured to meet an energy balance • Proportion of new and existing development meeting space heating demand targets • Proportion of existing buildings moving to low carbon heating
9	To protect and manage water resources (including groundwater)	<ul style="list-style-type: none"> • Number of developments securing improvements to the Regent's Canal • Number of developments required to undertake a Foundation Works Risk assessment and Hydrogeological Risk Assessment
10	To ensure our buildings and environment can adapt to a changing climate	<ul style="list-style-type: none"> • Number of major developments installing measures to cool the local environment • Number of developments meeting a greenfield runoff rate • Number of developments installing a greywater system • Progress against Climate Change Action Plan targets
11	To promote high quality and sustainable urban design	<ul style="list-style-type: none"> • Number of developments in the borough successful at award schemes • Number of developments incorporating dementia friendly design measures • Number of schemes which achieve Secured by Design
12	To protect and enhance the historic environment	<ul style="list-style-type: none"> • Number of buildings on Historic England's Buildings at Risk Register
13	To ensure new development makes efficient use of land, buildings and infrastructure	<ul style="list-style-type: none"> • Number of sites on the brownfield register • Number of applications where buildings are retained / re-used • Number of applications where substantial demolition is approved
14	To encourage and accommodate sustainable economic growth and employment opportunities	<ul style="list-style-type: none"> • Gains / losses in employment floorspace • Apprenticeships secured through S106 • Local training scheme places achieved from completed developments

Ref.	SA objective	Monitoring Indicators
		<ul style="list-style-type: none"> • Employment / unemployment rate in the Borough
15	To ensure our designated centres remain sustainable and adaptable for the future	<ul style="list-style-type: none"> • Total amount of additional retail floorspace in designated centres • Gains / losses of recreation, leisure, culture and arts facilities • Number of vacant retail premises in designated centres • Gains / losses in visitor accommodation

Chapter 9 - Conclusion

- 8.4 This SA Report has been prepared to accompany the Regulation 19 consultation for the Camden Local Plan Proposed Submission Draft. The SA has sought to identify significant effects emerging from the Camden Local Plan in line with the SEA Regulations, National Planning Policy Framework and good practice set out in the Planning Practice Guidance.
- 8.5 The Local Plan sets out the overarching development strategy for Camden over the period to 2041. The development strategy aims to address the long-term needs of the borough and respond to the challenges it faces. It seeks to maximise opportunities for providing new and affordable homes, jobs, and the infrastructure required to support this, whilst seeking to ensure that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents.
- 8.6 The Local Plan seeks to deliver a minimum of 11,550 additional homes and 406,359 sqm of net additional office floorspace (use classes E(g)(i) and E(g)(ii)) over the Plan period, with development planned to take place across the borough, with the key areas of growth expected to be around:
- Euston;
 - Camley Street and St Pancras Way;
 - Holborn;
 - Regis Road and the Murphy site in Kentish Town;
 - Camden Goods Yard in Camden Town; and
 - The O2 site in West Hampstead.
- 8.7 Further development is also planned as part of the Council's Community Investment Programme, with regeneration schemes being taken forward on a number of housing estates. Development will also take place outside of these identified areas, although not at the same scale.
- 8.8 The Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden. Within each area, site allocations have been identified, in accordance with the Council's development strategy, to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities, together with necessary infrastructure. Sites have been selected for allocation in line with the guidance set out in the National Planning Policy Framework and associated National Planning Policy Guidance, taking into account the limited availability of land available in the borough.
- 8.9 The Local Plan also provides a strong policy direction on a full range of local planning issues across the borough including:

- Meeting the need for housing and supporting the provision of different forms of housing, for example permanent self-contained housing, student housing and housing for people with care and support requirements (e.g. older people);
- Responding to the climate and ecological emergency;
- Creating a sustainable and inclusive economy and supporting the Central Activities Zone and Knowledge Quarter;
- 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; and
- 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.

8.10 On the whole, the growth strategy and policies in the Plan perform better than or similar to the reasonable alternatives tested and overall it is considered that the Plan will have a positive effect against social, economic and environmental objectives.

8.11 The policies in the Local Plan Proposed Submission Draft have the potential to generate significant positive effects for the borough across the range of sustainability issues tested through this SA process, as shown in the number of positive cumulative effects identified in Chapter 7 of this SA Report.

8.12 The scale of development proposed through the Camden Local Plan does have the potential to generate negative effects on the borough's existing biodiversity and heritage assets, community facilities, water and air quality. However, every effort has been made in the Plan to avoid and minimise such negative effects through a robust and diverse range of policy approaches.

8.13 The London Borough of Camden does not exist in isolation. Neighbouring boroughs are also planning to deliver considerable amounts of development. This will result in cumulative effects, for example through the generation of additional traffic. The Council will therefore continue to work closely with its neighbours and the Greater London Authority to make sure that plans are co-ordinated to provide an integrated approach to maintaining and enhancing quality of life for residents, workers and visitors, and to ensure that a high quality and resilient environment is created.

9.1 Next Steps

8.14 This SA Report will be published for comment alongside the Local Plan Proposed Submission Draft.

8.15 After this period, the Local Plan will be submitted to the Planning Inspectorate for examination. The Planning Inspector will consider whether the Plan meets the tests of 'soundness' and whether it can proceed to adoption by the Council.

Appendix 1: Compliance with SEA Directive

As discussed in Chapter 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 below sets out how and where (within this report) the regulatory requirements are reflected.

Table A: ‘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	Chapters 1 (Introduction) and 2 (Sustainability Context) include 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. They are also summarised in Chapter 3 (Sustainability Context).
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an ‘SA framework’, which is presented within Chapter 3 of this SA.
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 Chapter 3. With regards to explaining how “... considerations have been taken into account...”, Chapter 4 explains ‘reasons for supporting the preferred approach’,

	that is, how/why the preferred approach is justified in light of the alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	Chapter 4 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Chapters 6 and 7 present an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics / 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	Chapter 7 presents recommendations on this.
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	Chapter 4 deals with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. It also explains 'reasons for supporting the preferred approach', that is, it explains how / why the preferred approach is justified in light of the alternatives (growth scenarios) appraisal. Chapter 5 deals with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on certain policy choices. Chapter 2 (Methodology) discusses difficulties encountered in compiling the required information.
i) ... measures envisaged concerning monitoring	Chapter 8 presents this information.
j) a non-technical summary... under the above headings	The Non-Technical Summary is published as a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	

<p>Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>This Interim SA Report was published alongside the draft Local Plan in 2024 in order to inform consultation and the Local Plan Proposed Submission Draft.</p>
<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>This Interim SA Report was taken into account when finalising the Local Plan Proposed Submission Draft for publication.</p>

Appendix 2 – Consultation Responses

Consultation on the Sustainability Appraisal Scoping Report

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

- The Environment Agency
- Natural England
- Historic England

The consultation with statutory consultees was undertaken April to May 2023. A summary of the comments received are noted below.

Natural England – no comments.

Historic England –

- The Report has identified the relevant plans and programmes which are of relevance to the development of the local plan and that it has established an appropriate Baseline to establish an overall picture of the current state of the borough's historic environment.
- SA objective 12 suggestion of further sub-criteria: Help ensure new development maintains local character and respects existing high quality townscape? Encourage heritage-led regeneration? Help provide solutions to those assets on the Heritage at Risk register?
- The SA should also set out indicators to enable understanding over the Plan period as to the effects on the historic environment. These could include: The number and condition of heritage assets on the Heritage at Risk register; The proportion of conservation areas with up to date appraisals and/or management plans.

In response to Historic England's comments to the SA Scoping Report:

- Additional criteria were added into the SA objective for Heritage; and
- Comments on monitoring have been taken into account and reflected where considered appropriate in the SA Monitoring chapter.

Environment Agency –

- We recommend reviewing and including the recently published London Planning Guidance on Air Quality Positive (AQP) Guidance.

- We also recommend including Natural England's newly published Green Infrastructure Framework - Principles and Standards for England for advice on how Green Infrastructure can be used to support and enhance communities.
- We note there is no indicator for soil and groundwater quality. Due to the presence of Source Protection Zones (SPZ) within the borough, we recommend incorporating this within the Appendix.
- We recommend Appendix 2: Baseline Indicators is amended to incorporate the additional indicators.
- We recommend that an amendment is made to make specific reference to National Planning Policy Framework (NPPF) paragraphs 174 and 183, which mandate that policies should contribute and enhance the natural and local environment and take full account of ground conditions and potential risks from contamination. Additionally, the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted.
- Policies should require developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated. Policies should also require developers to ensure sites are suitable or made suitable for intended use. Furthermore, policies should require developers to prevent discharges to ground through land affected by contamination.
- The Upper Chalk aquifer should be taken in full consideration where developments where deep piled foundations are proposed. Should foundations works penetrate through the London Clay to the Chalk then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised.
- We recommend the borough commits to and considers how to deliver an air quality neutral and air quality positive approach, in line with London Plan Policy SI1 Improving Air Quality. We encourage consideration is also given to how an air quality approach can be linked to other policies within the Plan, such as improvement and provision of green infrastructure.
- We recommend the strengthening of objectives regarding transport infrastructure being located away from areas of high flood risk, or where road drainage may impact on water resources/quality issues. In addition, site selection for new infrastructure should account for future climate change.
- In order to achieve resilient functioning ecosystems and allow our wildlife to adapt to climate change, sufficient habitat cover needs to be present within the borough. The key issues that we would like to be considered as fundamentals of creating resilient functioning ecosystems are around habitat connectivity and ensuring wild refuge areas are maintained. We also recommend new re-naturalised areas are created, particularly in the boroughs green spaces. It would be advisable to set a target for the percentage of wild cover within green spaces to help prevent further biodiversity decline.
- In line with the commitment made in the Government's 25 Year Environment Plan, Natural England have recently published new guidance known as the Green Infrastructure Framework (Green Infrastructure Home

(naturalengland.org.uk)). This includes a *Green Infrastructure Planning and Design Guide* which provides evidence-based practical guidance on how to plan and design good green infrastructure. It complements the National Model Design Code and National Design Guide, and should be used to inform Camden SA objectives on environmental protection/enhancement and biodiversity.

- We recommend attention is given the water company drainage and wastewater management plans, which account for climate change, ensuring drainage infrastructure can cope with increased intensity of storms. The Environment Act (2021) made these plans statutory and collaborative, and they should be integrated into long term planning documents.
- For sites in locations within Source Protection Zones (SPZs) where groundwater is vulnerable, objectives should recognise the importance of managing risks to groundwater resources associated with deep piled foundations which are typically required for tall buildings.

It was not considered necessary to update the SA Scoping Report in response to the Environment Agency's comments, as they were more relevant to the content of the new Local Plan. The comments were used to inform the development of the Plan.

Consultation on the Interim Sustainability Appraisal

The Interim SA and non-technical summary were published alongside the draft Local Plan for public consultation and engagement from January to March 2024.

No comments were received on the Interim SA.

Appendix 3 – Sustainability Appraisal of the Camden Local Plan Reasonable Policy Alternatives

Key

Key	+ Minor positive	++ Major positive	0 Neutral	- Minor negative	-- Major negative	? Uncertain
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Policy H2 - Maximising the supply of self-contained housing from mixed use schemes

Two options have been appraised:

- Option 1: Retain and extend the area that Policy H2 covers
- Option 2: Remove the policy from the Plan.

	SA Objectives															
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	5 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Heritage	13 Land	14 Economy	15 Centres	
Option 1	+	+	0	0	0	0	0	0	0	0	0	0	0	+	-	+
Option 2	-	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0

Appraisal findings

Option 1: Retain and extend the area that Policy H2 covers

Option 1 would be likely to have a positive impact on housing provision as it will help to secure additional housing that would not have been brought forward otherwise in the parts of the borough covered by H2. Additional homes also have the potential to increase footfall in designated centres which should contribute to their continued operation and increase opportunities of living and working close together. This approach potentially adds to community safety by ensuring that active street frontages and natural surveillance are considered as an aspect of mixed-use schemes. Location of housing close to jobs, and particularly in locations that have the best access to public transport, would likely have positive effects on reducing the need to travel by private transport modes and enhanced permeability for non-motorised travellers.

There are likely to be negative effects on the economy objective as the proportion of non-residential floorspace would be reduced further than the existing adopted plan. It is not considered that the negative effect on the economy objective would be significant.

Option 2: Remove the policy from the Plan.

Option 2 would likely have a minor negative effect on the objective relating to housing provision as it would reduce the Council's ability to secure additional housing in certain parts of the borough covered by the current H2.

Option 2 may have a minor positive impact on the Economy objective by removing requirements on commercial schemes to provide homes, providing scope to potentially increase employment floorspace.

Policy CC2 – Prioritising the Retention of existing buildings

Two options have been appraised:

- Option 1: Expect proposals involving substantial demolition to demonstrate that the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and optimises site capacity.
- Option 2: Proceed with the Policy CC2 approach in Regulation 18 draft Plan.

	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	5 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Heritage	13 Land	14 Economy	15 Centres
Option 1	+	0	0	0	0	0	0	+	0	0	+	0	+	+	0
Option 2	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0

Appraisal findings

The assessment of Policy CC2 as a whole has shown that both options are likely to have equal positive effects against the energy objective in terms of promoting the sustainable use of resources. Additional positive effects against the homes, design, land, and economy objectives are likely for Option 1, as proposals which optimise capacity will also make the best use of land.

Policy CC5 - Sustainability Improvements to Existing Buildings

Three options have been appraised:

- Option 1: Require extensions to existing buildings to achieve fabric efficiency U values that are higher than the current Buildings Regulations.
- Option 2: Require proposals for building extensions to include a heat pump.
- Option 3: Instead of requiring measures to be undertaken as part of minor works to an existing building, have a policy approach which seeks to support and encourage improvements to existing buildings.

	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	5 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Heritage	13 Land	14 Economy	15 Centres
Option 1	0	0	0	0	0	0	0	+	0	0	+	0	0	0	0
Option 2	0	0	0	?	0	0	+	++	0	0	0	0	0	0	0
Option 3	+	0	0	0	0	0	0	+	0	0	+	0	0	0	0

Appraisal findings

Option 1 is likely to have a positive effect against the energy and design SA objectives. However the Energy Use in Existing Buildings study found that the overall effect of fabric measures to an extended part of a building alone, whilst having a positive effect was not significant.

Option 2 would likely have a positive effect against the air quality objective as it promotes the replacement of gas boilers with heat pumps. The Energy Use in Existing Buildings study found that replacing a gas boiler with an air source heat pump alone would

significantly reduce carbon emissions and operational energy. There are however uncertain effects predicted against the amenity objective with regards to the potential noise impact.

Option 3 will likely have positive effects against the homes, energy, and design objectives through the Council’s support and encouragement to improve the sustainability of homes and buildings in the borough. This effect is likely to be limited however as the policy is supportive rather than requiring improvements to be undertaken.

Policy CC6 – Energy Use and the Generation of Renewable Energy

Two options have been appraised:

- Option 1: Continue using Part L Building Regulations as a metric to achieve net zero carbon development
- Option 2: Use an energy based metric (Energy Use Intensity) to achieve net zero carbon development

	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	5 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Heritage	13 Land	14 Economy	15 Centres
Option 1	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0
Option 2	+	0	0	0	0	0	0	++	0	0	+	0	0	0	0

Appraisal findings

Option 1: Continue using Part L Building Regulations as a metric to achieve net zero carbon development

Option 1 continues the current Local Plan approach which seeks to improve upon a Part L Building Regulations baseline with a carbon offset contribution to meet a net zero carbon target. This approach aligns and is likely to have positive effects against the energy objective. Policy option 1 is a widely accepted method for improving the energy standard of buildings.

Option 2: Use an energy based metric (Energy Use Intensity) to achieve net zero carbon development

Option 2 provides an alternative metric to achieve zero carbon development. This approach uses a combination of measures including Space heating demand (building fabric and design), and Energy Use Intensity to ensure development reduces the need to heat a home or building through fabric measures and is designed to ensure it uses as little energy as possible. More significant positive effects are predicted against the energy objective, when compared to option 1, for the following reasons:

- The Building Regulations metric is restricted to measuring regulated energy use (including fixed services for heating, hot water, cooling, lighting, fans and pumps). An energy based metric includes emissions of all energy use associated with buildings, which provides the opportunity to influence and abate the emissions associated with unregulated use at the design stage;
- Building regulations compliance models significantly underestimate space heating demand, which devalues the effect of design, fabric and heating system efficiency measures;
- Option 2 is considered to reduce the performance gap shown in building regulation compliance models between the proposed building and as built performance; and
- An energy based metric can be easily monitored post occupancy.

While improving the energy performance of homes may increase capital costs in the short term, it is expected that these additional costs will reduce once the industry matures and low carbon homes become conventional, delivering positive effects at wider scale.

Policy IE4 - Affordable Workspace

Two options have been appraised:

- Option 1: Provide greater flexibility with regard to the proportion of floorspace provided as affordable workspace
- Option 2: Proceed with the Policy IE4 approach in the Regulation 18 draft Local Plan

	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	5 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Heritage	13 Land	14 Economy	15 Centres
Option 1	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
Option 2	-?	0	0	0	0	0	0	0	0	0	0	0	0	+	0

Appraisal findings

The assessment of Policy IE4 has shown that both options are likely to have positive effects against the economy objective in terms of encouraging sustainable economic growth and employment opportunities. Option 2 may have a negative effect on the delivery of homes however the degree of this effect is limited and uncertain.

Appendix 4 – Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft

Key

Key	+ Minor positive	++ Major positive	0 Neutral	- Minor negative	-- Major negative	? Uncertain
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SA of the Vision and Objectives

	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
Vision	+	+	+	0	0	0	0	0	0	0	0	0	0	+	0
Objective 1	+	+	+	0	0	0	+	++	0	++	+	0	0	0	0
Objective 2	++	+	+	0	0	0	0	0	0	0	0	0	+	0	0
Objective 3	0	++	++	0	0	0	0	0	0	+	+	0	0	0	0
Objective 4	0	+	+	0	0	0	0	0	0	0	0	0	0	++	+

	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
Objective 5	+	+	+	0	0	0	0	0	0	0	0	0	0	+	++
Objective 6	+	+	++	+	0	0	0	+	0	+	+	+	0	0	0
Objective 7	0	++	+	0	0	0	+	0	0	0	0	0	0	0	0
Objective 8	0	+	+	0	++	++	0	0	0	0	0	0	0	0	0
Objective 9	0	++	+	0	+	+	0	0	0	0	+	0	0	0	0

SA of the Area Policies

	SA Objectives														
Site allocation	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
Policy S1 - South Camden	++	+	++	?	+	+	?	0	0	+	0	0	+	++	+

Site allocation	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
Policy S2 - Euston Opportunity Area	++	+	++	-?	+	+	?	0	0	0	+	0	+	++	+
Policy S3 - Hatton Garden Jewellery Industry Area	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
Policy S4 - Bloomsbury Campus Area	0	+	0	0	+	0	?	+	0	0	+	+	+	+	0
Policy C1 - Central Camden	++	+	+	-?	+	+	?	0	0	+	0	0	+	++	+
Policy W1 - West Camden	+	+	+	-?	+	+	+?	0	0	+	0	0	+	+	+
Policy N1 - North Camden	+	+	+	-?	+	+	?	0	0	+	0	+	+	+	+

SA of the Site Allocation Policies

Site allocation	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
South Camden															
S5 120-136 Camley Street	++	+	0	-	+	+	0	0	0	?	+	0	++	++	0
S6 104 – 114 Camley Street and Cedar Way Industrial Estate	++	++	+	-	+	+	0	0	0	?	+	0	++	++	0
S7 24-28 Royal College Street (Parcelforce and ATS Tyre Site)	+	+	0	0	+	0	0	0	0	?	+	?	++	+	0
S8 St Pancras Hospital	+	+	0	-	+	+	0	0	0	?	+	?	+	+	+
S9 Shorebase Access	+	0	0	-	0	+	0	0	0	?	+	?	++	0	0
S10 Bangor Wharf and Eagle Wharf	+	0	0	0	0	0	0	+	0	?	+	?	+	+	+
S11 Former Royal National Throat, Nose and Ear Hospital	+	+	0	0	+	0	?	0	0	?	+	?	+	+	0
S12 Belgrove House	+	+	++	0	0	0	?	0	0	0	+	?	+	+	+
S13 Former Thameslink, Pentonville Road	+	0	0	-	0	0	?	0	0	?	+	?	+	+	+

Site allocation	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
S14 Land bounded by Pakenham Street and Wren Street	+	+	0	0	0	0	0	0	?	?	+	?	+	+	0
S15 Land to the rear of the British Library	+	+	++	0	+	0	?	0	0	?	+	?	+	+	0
S16 Former Central St Martins College	+	+	0	0	0	0	?	0	?	?	+	?	+	+	+
S17 Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street	+	+	0	0	0	0	?	0	?	?	+	?	+	+	+
S18 135 – 149 Shaftesbury Avenue	0	+	0	0	0	0	0	0	?	?	+	?	+	+	+
S19 Cockpit Yard and Holborn Library	+	0	0	0	0	0	0	0	?	?	+	?	+	+	0
S20 York Way Depot and adjacent land at Freight Lane	+	+	0	-	0	+	0	0	0	0	+	0	++	+	0
S21 Agar Grove Estate	+	0	0	0	0	0	0	0	0	0	0	0	+	0	+
S22 6 St Pancras Way	+	0	0	0	0	0	0	0	0	0	0	0	+	+	0
S23 Tybalds estate	+	0	0	0	0	0	0	0	?	0	0	0	+	0	+
S24 294-295 High Holborn	+	0	0	0	0	0	?	0	?	0	0	0	+	+	+
S25 156 – 164 Gray's Inn Road	+	0	0	0	0	0	0	0	?	0	0	0	+	+	0

Site allocation	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
S26 8-10 Southampton Row	+	0	0	0	0	0	?	0	?	0	0	0	+	+	+
S27 Middlesex Hospital Annex, 44 Cleveland Street	+	0	0	0	0	0	0	0	?	0	0	0	+	+	+
S28 Central Somers Town	+	0	0	0	0	0	0	0	0	0	0	0	+	0	0
S29 Chalton Street, Godwin and Crowndale Estate	+	0	0	0	0	0	0	0	0	0	0	0	+	0	+
S30 - Birkbeck College, Malet Street	0	0	0	0	0	0	0	0	?	0	0	0	+	+	0
S31 Senate House (NW quadrant), Malet Street	0	0	0	0	0	0	0	0	?	0	0	0	+	+	0
S32 20 Russell Square	0	0	0	0	0	0	0	0	?	0	0	0	+	+	0
Central Camden															
C2 Regis Road and Holmes Road Depot	++	++	+	-	+	++	0	0	0	?	+	?	++	++	++
C3 Murphy site	++	++	+	-	+	++	0	0	0	?	+	?	++	++	++
C4 Kentish Town Police Station	+	+	0	?	0	0	0	0	0	0	+	?	+	0	+
C5 369 – 377 Kentish Town Road	+	+	0	-	0	0	0	0	0	?	+	0	+	0	+
C6 Kentish Town Fire Station	+	0	0	?	0	0	0	0	0	?	+	?	+	0	+

Site allocation	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
C7 Morrisons Supermarket	++	+	0	-	+	+	+?	0	0	?	+	?	++	++	++
C8 Former Morrisons Petrol Station	+?	+	0	-	0	0	+?	0	0	?	+	?	++	+	+
C9 100 Chalk Farm Road	+	0	0	-	0	0	0	0	0	?	+	?	+	+	+
C10 Juniper Crescent	++	+	+	-	+	0	0	0	0	0	+	?	+	0	+
C11 Network Rail land at Juniper Crescent	+	+	0	-	0	+	0	0	0	?	+	?	++	0	+
C12 Gilbeys Yard	++	+	+	0	+	0	0	0	0	?	+	?	+	0	+
C13 West Kentish Town Estate	++	+	+	-	+	+	0	0	0	?	+	?	+	0	+
C14 Hawkrigde House	+	0	0	0	0	0	0	0	0	0	+	?	+	0	0
C15 Wendling Estate and St Stephens Close	++	++	+	-	+	0	0	0	0	?	+	?	+	0	+
C16 Shirley House	+	0	0	0	0	0	?	0	0	?	+	?	+	-	+
C17 Camden Town over station development	++	+	+	-	0	0	?	0	0	?	+	?	+	+	+
C18 UCL Camden Campus, 109 Camden Road	+	+	0	0	+	0	0	0	0	?	+	0	+	0	0

Site allocation	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
C19 Arlington Road former depot	+	0	0	0	0	0	0	0	0	0	+	?	+	0	+
C20 Highgate Centre	+	0	0	0	0	0	0	0	0	0	0	0	+	0	+
C21 Grand Union House	+	0	0	0	0	0	?	0	0	0	0	0	+	+	+
C22 Heybridge garages	+	0	0	0	0	0	0	0	0	0	0	0	+	0	0
C23 Former flats 121 – 129 Bacton, Haverstock Road	+	0	0	0	0	0	0	0	0	0	0	?	+	0	+
C24 52 – 54 Avenue Road	+	0	0	0	0	0	0	0	?	0	0	0	+	0	0
C25 5-17 Haverstock Hill (Eton Garage)	+	0	0	0	0	0	0	0	0	0	0	0	+	0	+
C26 160 Maldon Road	+	0	0	0	0	0	0	0	0	0	0	0	+	0	0
C27 Land adjacent to Constable House, Adelaide Rd	+	0	0	0	0	0	0	0	0	0	0	0	+	0	+
West Camden															
W2 O2 Centre and car park, car showrooms, 14 Blackburn Road	++	++	++	-	++	+	+	0	0	?	+	?	++	++	++
W3 11 Blackburn Road	+	0	0	?	0	0	0	0	0	0	+	0	+	0	+

Site allocation	SA Objectives														
	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
W4 13 Blackburn Road	+	0	0	?	0	0	0	0	0	0	+	0	+	0	+
W5 188 – 190 Iverson Road	+	0	0	0	0	+	0	0	0	0	+	?	+	0	0
W6 Land to the rear of Meridian House	+	0	0	0	0	+	?	0	0	?	+	?	+	0	+
W7 Gondar Gardens	+	0	0	0	0	+	0	0	0	0	+	?	+	0	0
W8 88-92 Kilburn High Road	+	0	0	0	0	0	?	0	0	?	+	?	+	0	+
W9 Land at Midland Crescent, Finchley Road	+	0	0	0	0	0	?	0	0	0	0	0	+	0	+
W10 BP Petrol Station, 104A Finchley Road	+	0	0	0	0	0	?	0	0	0	0	0	+	0	+
W11 Abbey Co-Op Housing Site, Emminster and Hinstock	+	0	0	0	0	0	0	0	0	0	0	0	+	0	0
W12 100 Avenue Rd	+	0	0	0	0	0	?	0	?	0	0	?	+	0	+
W13 551-557 Finchley Road	+	0	0	0	0	0	0	0	?	0	0	0	+	0	0
W14 317 Finchley Road	+	0	0	0	0	0	?	0	0	0	0	0	+	0	+
North Camden															

	SA Objectives														
Site allocation	1 Homes	2 Health	3 Equality	4 Amenity	5 Open space	6 Biodiversity	7 Air quality	8 Energy and resources	9 Water	10 Resilience	11 Design	12 Historic environment	13 Land	14 Economy	15 Centres
N2 Mansfield Bowling Club	+	+	0	0	+	0	0	0	0	?	+	0	+	0	0
N3 Queen Mary's House	+	0	0	0	0	0	0	0	?	?	+	?	+	0	+
N4 Hampstead Delivery Office	+	0	0	+	0	0	+	0	?	?	+	0	+	-	+

SA of the Topic Specific Policies

Delivering Sustainable and Healthy Development and Delivery and Monitoring Policies

SA objective / Policies	DS1	DM1
1. Homes	+	0
2. Health	+	+
3. Equality	+	+
4. Amenity	+	0
5. Open space	+	+
6. Biodiversity	+	0
7. Air quality	+	0
8. Energy and resources	+	0
9. Water	+	+
10. Resilience	+	0
11. Design	+	0
12. Historic environment	+	0
13. Land	+	0
14. Economy and employment	+	0
15. Centres	+	0

Housing Policies

Housing policies / SA objective	H1	H2	H3	H4	H5	H6	H7	H8	H9	H10	H11
1. Homes	++	+	+	++	+	+	+	+	+	+	+
2. Health	+	+	+	+	+	+	+	+	+	+	+
3. Equality	0	+	0	+	+	+	+	+	+	+	+
4. Amenity	0	+	0	0	0	0	0	0	+	+	+
5. Open space	0	0	0	0	0	0	0	0	0	0	0
6. Biodiversity	0	0	0	0	0	0	0	0	0	0	0
7. Air quality	0	0	0	0	0	0	0	0	0	0	0
8. Energy and resources	0	0	0	0	0	0	0	0	0	0	0
9. Water	0	0	0	0	0	0	0	0	0	0	0
10. Resilience	0	0	0	0	0	0	0	0	0	0	0
11. Design	+	0	0	0	0	0	0	0	0	0	0
12. Historic environment	0	0	0	0	0	0	0	0	0	0	0
13. Land	++	+	0	0	+	0	0	0	0	0	0
14. Economy and employment	0	-?	0	0	0	0	0	0	0	0	0

15. Centres	0	0	0	0	0	0	0	0	0	0	0
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Responding to the Climate Emergency Policies

Climate policies / SA objective	CC1	CC2	CC3	CC4	CC5	CC6	CC7	CC8	CC9	CC10	CC11
1. Homes	+	0	0	0	+	+	0	+	0	0	0
2. Health	+	0	0	0	+	+	0	+	0	0	0
3. Equality	0	0	0	0	0	0	0	0	0	0	0
4. Amenity	-	+	0	0	-	-	0	+	0	0	0
5. Open space	?	0	0	0	0	0	0	0	0	0	?
6. Biodiversity	+	0	0	0	0	0	0	+	0	0	+
7. Air quality	+	+	0	0	+	+	+	+	0	0	0
8. Energy and resources	++	++	++	+	+	++	+	+	+	0	0
9. Water	+	0	+	0	+	0	0	0	+	0	+
10. Resilience	++	0	0	0	+	0	0	++	0	++	+
11. Design	+	0	+	+	+	+	0	0	0	0	0
12. Historic environment	0	0	0	0	?	?	0	0	0	0	0
13. Land	++	++	0	0	0	0	0	0	0	0	0

14. Economy and employment	0	0	0	0	0	0	0	0	0	0	0
15. Centres	0	0	0	0	0	0	0	0	0	0	0

Delivering an Inclusive Economy Policies

Inclusive economy policies / SA objective	IE1	IE2	IE3	IE4	IE5	IE6	IE7	IE8	IE9	IE10
1. Homes	0	+	+	0	0	0	0	0	0	0
2. Health	+	0	0	0	0	+	+	+	+	+
3. Equality	+	+	+	+	0	+	0	0	0	+
4. Amenity	0	0	?	0	0	0	0	0	0	0
5. Open space	0	0	0	0	0	0	0	0	0	0
6. Biodiversity	0	0	0	0	0	0	0	0	0	0
7. Air quality	0	0	0	0	0	0	0	0	0	0
8. Energy and resources	0	0	0	0	0	0	0	0	0	0
9. Water	0	0	0	0	0	0	0	0	0	0
10. Resilience	0	0	0	0	0	0	0	0	0	0
11. Design	0	0	0	0	0	+	0	0	0	0
12. Historic environment	0	0	0	0	0	+	0	0	0	0

13. Land	+	0	++	0	0	0	0	0	0	0
14. Economy and employment	++	+	++	+	+	+	0	0	0	+
15. Centres	0	+	0	0	+	++	?	?	0	+

Supporting Camden's Communities Policies

Supporting Communities policies / SA objective	SC1	SC2	SC3	SC4	SC5	SC6	SC7
1. Homes	0	+	+	0	0	0	0
2. Health	++	++	++	++	++	+	+
3. Equality	+	++	+	+	0	+	+
4. Amenity	0	0	?	0	0	?	?
5. Open space	0	0	0	++	?	0	0
6. Biodiversity	0	0	0	+	+	0	0
7. Air quality	0	0	0	0	0	0	0
8. Energy and resources	0	0	0	0	0	0	0
9. Water	0	0	0	0	0	0	0
10. Resilience	0	0	0	+	0	0	0
11. Design	+	+	0	+	0	0	0
12. Historic environment	0	0	0	+	0	0	+
13. Land	0	0	0	0	0	0	0

14. Economy and employment	0	0	0	0	0	+	0
15. Centres	0	0	0	0	0	0	+

Natural Environment Policies

Natural Environment policies / SA objective	NE1	NE2	NE3	NE4
16. Homes	0	0	0	0
17. Health	+	+	+	0
18. Equality	+	+	0	0
19. Amenity	0	0	0	0
20. Open space	+	?	0	0
21. Biodiversity	++	++	+	0
22. Air quality	0	0	0	0
23. Energy and resources	0	0	0	0
24. Water	0	0	0	++
25. Resilience	+	0	0	0
26. Design	0	0	0	0
27. Historic environment	0	0	0	0
28. Land	0	0	0	0
29. Economy and employment	0	0	0	0

30. Centres	0	0	0	0
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Design and Heritage Policies

Design and Heritage policies / SA objective	D1	D2	D3	D4	D5	D6	D7	D8
1. Homes	+	0	+	+	0	0	0	0
2. Health	+	0	+	+	0	0	0	0
3. Equality	+	0	+	0	0	0	0	+
4. Amenity	+	-	0	+	0	+	+	0
5. Open space	+	0	+	0	0	0	0	0
6. Biodiversity	+	?	+	0	0	0	0	0
7. Air quality	0	0	0	0	0	0	0	0
8. Energy and resources	+	-	+	+	+	+	0	0
9. Water	0	0	0	0	0	?	0	0
10. Resilience	+	0	+	0	+	0	0	0
11. Design	++	+	++	+	+	+	+	+
12. Historic environment	0	?	0	+	++	0	0	+
13. Land	0	+	0	0	0	+	0	0
14. Economy and employment	0	0	0	0	0	0	0	0

15. Centres	0	0	0	0	0	0	0	+	+
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Protecting Amenity Policies

Protecting Amenity policies / SA objective	A1	A2	A3	A4
1. Homes	0	0	-?	0
2. Health	0	+	+	+
3. Equality	0	+	0	0
4. Amenity	++	+	++	+
5. Open space	0	0	0	0
6. Biodiversity	0	0	0	0
7. Air quality	0	0	++	0
8. Energy and resources	0	0	0	0
9. Water	+	0	0	0
10. Resilience	0	0	0	0
11. Design	0	++	0	0
12. Historic environment	0	0	0	0
13. Land	0	0	0	0
14. Economy and employment	+	0	0	0
15. Centres	0	?	0	0

Safe, Healthy, and Sustainable Transport Policies

Transport policies / SA objective	T1	T2	T3	T4	T5	T6
1. Homes	0	0	0	0	0	0
2. Health	++	+	+	+	0	0
3. Equality	+	+	+	0	0	0
4. Amenity	+	+	0	0	0	+
5. Open space	+	0	0	0	0	0
6. Biodiversity	+	+	0	0	+	0
7. Air quality	+	+	+	+	+	+
8. Energy and resources	+	0	0	+	0	+
9. Water	+	+	0	0	0	0
10. Resilience	+	+	0	0	+	0
11. Design	+	0	0	0	0	0
12. Historic environment	0	0	0	0	0	0
13. Land	0	0	0	0	+	0
14. Economy and employment	0	0	0	0	0	0
15. Centres	0	0	0	0	0	0

Appendix 5 - Sites considered but not allocated

Sites considered as part of the preparation of the draft Site Allocations Local Plan 2020 (Regulation 18 version) but not included as allocations 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	Fitzrovia Area Action Plan (AAP), London Strategic Housing Land Availability Assessment 2017 (SHLAA), Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Saatchi Block, 80 Charlotte St	Fitzrovia AAP and London SHLAA 2017	Under construction/ advanced construction stage at the time of consideration
Queens Square House, 22 Queen Square	Pre-app submission	Unlikely to become available in the Plan period
27 Gordon Square and 15 Gordon Street	Allocated in Camden Site Allocations 2013	Recently developed
20-22 Gordon Street / Wates House	Allocated in Camden Site Allocations 2013	Recently developed
61 - 63 Tottenham Court Road & 1-7 and 11-13 Goodge Street	Fitzrovia AAP	Recently developed
Astor College, 99 Charlotte Street	Fitzrovia AAP	Under construction/ advanced construction stage at the time of consideration
Royal Ear Hospital and Medical Students Union, Huntley Street	Fitzrovia AAP	Under construction/ advanced construction stage at the time of consideration

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
Rosenheim Building, Grafton Way	Fitzrovia AAP	Under construction/ advanced construction stage at the time of consideration
Odeon Site, Grafton Way	Fitzrovia AAP	Under construction/ advanced construction stage at the time of consideration
CIP - Maiden Lane Estate	London SHLAA 2017	Recently developed
79 Camden Road	London SHLAA 2017	Recently developed
196-206 Camden Road	London SHLAA 2017	Unlikely to become available in the Plan period
Hammond Street depot	CIP, Officer suggestion	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
r/o 142 Camden Road	Officer suggestion	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Centric Close, Oval Road	London SHLAA 2017 and Planning application	Under construction/ advanced construction stage at the time of consideration
Utopia Village, 7 Chalcot Road	London SHLAA 2017	Unlikely to become available in the Plan period
Hawley Wharf, Chalk Farm Road	London SHLAA 2017	Under construction/ advanced construction stage at the time of consideration
44 - 44a Gloucester Avenue and r/o 46-50 Gloucester Avenue	London SHLAA 2017 and Planning application	Under construction/ advanced construction stage at the time of consideration

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
57-71 Pratt Street, 10-15 Georgiana Street and Royal College Street	2013 Site Allocation Plan and London SHLAA 2017	Unlikely to become available in the Plan period
Primrose Hill workshops, Oppidans Road	Officer suggestion	Unlikely to become available in the Plan period
Camden Road, Juniper Crescent	Call for Sites	Duplicate site – see Policy C11
King's College London, Kidderpore Avenue Hampstead Residence	London SHLAA 2017	Under construction/ advanced construction stage at the time of consideration
Holy Trinity Church, Finchley Road	Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
252 Finchley Road	Planning application	Under construction/ advanced construction stage at the time of consideration
328-338 Finchley Road	London SHLAA 2017	Under construction/ advanced construction stage at the time of consideration
Heath Park Gardens, Templewood Avenue	London SHLAA 2017	Unlikely to become available in the Plan period
Meridian House, 202 Finchley Road	Neighbourhood Plan	Duplicate site - see Policy W6
Conrad Court, 27 Redington Gardens	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
1 Platt's Lane	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
		considered to be beneath the threshold for allocation in the Plan.
Garages (8) on south side of Frognal Lane	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Garages to r/o 27A Frognal	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Hampstead Gate, 1A Frognal	Neighbourhood Plan	Unlikely to become available in the Plan period
R/o 166-200A Finchley Road, adjacent to Hampstead Gate	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
282-284 Finchley Road	Neighbourhood Plan and Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Garages adjacent to 30 Redington Road	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Kidderpore Hall	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
24, 25, 26 Redington Gardens	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
		considered to be beneath the threshold for allocation in the Plan.
65 and 67 Maygrove Rd	London SHLAA 2017 and Planning application	Recently developed
23 Ravenshaw Street	Officer suggestion	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
West Hampstead Police Station, 21 Fortune Green Road	Neighbourhood Plan	Unlikely to become available in the Plan period
Fortune Green Play Centre, Fortune Green Road	Neighbourhood Plan	Unlikely to become available in the Plan period
32 Lawn Road	London SHLAA 2017	Under construction/ advanced construction stage at the time of consideration
Land at Kiln Place (Blocks 1-64 65-80 81-96 97-104 105-116 1 Kiln Place	London SHLAA 2017	Under construction/ advanced construction stage at the time of consideration
Land adjacent to the Murphy's site	Call for Sites	Duplicate site within Policy C3
21-31 New Oxford Street	2013 Site Allocation Plan	Under construction/ advanced construction stage at the time of consideration
St Giles Circus/Consolidated	2013 Site Allocation Plan	Recently developed
Mount Pleasant, Phoenix Place	2013 Site Allocation Plan and Planning application	Under construction/ advanced construction stage at the time of consideration

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
150 High Holborn, London	London SHLAA 2017 and Planning application	Under construction/ advanced construction stage at the time of consideration
35 - 41 New Oxford Street, 10-12 Museum Street, 16A-18 West Central Street	Planning application	Under construction/ advanced construction stage at the time of consideration
Italian Hospital, GOSH	Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Templar House	Planning application	Recently developed
12-14 Greville Street	Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Ambassadors Theatre, West Street	Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
17 Charterhouse Street	Planning application	Under construction/ advanced construction stage at the time of consideration
4 Wild Court & 75 Kingsway	Planning application	Under construction/ advanced construction stage at the time of consideration
19-20 Procter Street	Call for Sites	Unlikely to become available in the Plan period
Centre Point Tower	London SHLAA 2017	Recently re-developed

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
Bourne Estate (south), Portpool Lane	London SHLAA 2017	Recently developed
Triangle Estate, High Holborn	Pre-app submission	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Thomas Neal Centre, Neal Street	Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Herbal House, 10 Back Hill	2013 Site Allocation Plan	Recently developed
124 Theobalds Road	Holborn Framework	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Athlone House, Hampstead Lane	London SHLAA 2017 and Planning application	Under construction/ advanced construction stage at the time of consideration
57-84 & 85-112 Makepeace Mansions	London SHLAA 2017	Recently developed
Swains Lane Retail Parade	Neighbourhood Plan and Planning application	Under construction/ advanced construction stage at the time of consideration
ASF garage, Highgate Road	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Harmood Street and r/o 34 Chalk Farm Road	2013 Site Allocation Plan	Recently developed

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
Bartrams Convent Hostel, Rowlands St	London SHLAA 2017	Under construction/ advanced construction stage at the time of consideration
Former Hampstead Police Station, 26 Rosslyn Hill	Call for Sites	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
6 Streatley Place	Officer suggestion	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
29 New End	2013 Site Allocation Plan	Under construction/ advanced construction stage at the time of consideration
254 Kilburn High Road	Planning application	Under construction/ advanced construction stage at the time of consideration
154 Loudoun Road	Call for Sites and London SHLAA 2017	Recently developed
Belsize Priory Health Centre, 208 Belsize Road	Call for Sites	Duplicate site within Policy W11
Mazenod Avenue Car Park	Officer suggestion	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Greenwood Place, 19-37 Highgate Road	2013 Site Allocation Plan and Planning application	Recently developed
Former BR Staff Association Club, College Lane	London SHLAA 2017 and Planning application	Under construction/ advanced construction stage at the time of consideration

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
Spire BMW, 1 Brown's Lane	London SHLAA 2017	Duplicate site – see Policy C2
Frideswide Place, Kentish Town Library	Neighbourhood Plan	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Wolsey Mews	Neighbourhood Plan	Unlikely to become available in the Plan period
2 Prince of Wales Road	Neighbourhood Plan	Unlikely to become available in the Plan period
Land adjacent to 42 Falkland Road	Officer suggestion	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
King's Cross Methodist Church, 58a Birkenhead Street	Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Stratstone, 277A Gray's Inn Road	2013 Site Allocation Plan and Planning application	Recently developed
49 Mecklenburgh Square	Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Former King's Cross Thameslink Station, Pentonville Road	Planning application	Duplicate site – see Policy S13
Stephenson House, 75 Hampstead Road	Identified in Euston Area Plan and Planning application	Within Euston Area Plan area

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
Koko, 1A Camden High Street, Hope & Anchor PH	Planning application	Under construction/ advanced construction stage at the time of consideration
Three Fields - Brierfield, Fairfield and Foxfield	Planning application	Unlikely to become available in the Plan period
Diorama, 17, 18 and 19 Park Square East	Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Regent's Park Barracks, Albany Street	London SHLAA 2017	Unlikely to become available in the Plan period
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 2017 and Planning application	Unlikely to become available in the Plan period
40-49 Edmund Terrace	2013 Site Allocation Plan	Recently developed
Belle Isle Frontage Site, York Way	Nominated in the 2018 Call for Sites	Wholly or mostly outside the borough boundary
102 Camley Street	Planning application	Recently developed

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
101 Camley Street	London SHLAA 2017 and Planning application	Under construction/ advanced construction stage at the time of consideration
The Triangle Site, 180 York Way	Planning application	Recently developed
Maria Fidelis School, 34 Phoenix Road and 1-39 Drummond Crescent	Identified in Euston Area Plan and London SHLAA 2017	Within Euston Area Plan area
53-55 Chalton Street & 70 Churchway	Identified in Euston Area Plan and Planning application	Within Euston Area Plan area
Building T1, Kings Cross Central	London SHLAA 2017	Recently developed
24 Crowndale Road	Planning application	Unlikely to become available in the Plan period
Kings Cross Station Throat	Nominated in the 2018 Call for Sites	Unlikely to become available in the Plan period
Rear of 148-152 West End Lane	London SHLAA 2017 and Planning application	Limited development potential. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
187-199 West End Lane	London SHLAA 2017	Recently developed
English National Opera, 165 Broadhurst Gardens	Neighbourhood Plan	Unlikely to become available in the Plan period
West Hampstead Fire Station, West End Lane	Neighbourhood Plan	Unlikely to become available in the Plan period

Site Name/Address	Site identification source/s	Reason why the site was not included in the draft Site Allocations Local Plan 2020
West Hampstead Underground station	Call for Sites	Whilst improvements to the station are planned, we are not aware of proposals to re-develop the station at this time and limited evidence has been provided to support this. We have no evidence to suggest that the site is deliverable in the Plan period. Site is considered to be unavailable.

Additional sites considered as part of the preparation of the draft new Local Plan 2024 (Regulation 18 version) but not included as allocations 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 - site is not currently available.
1 Eversholt Street (Kings Cross Signal Box)	Nominated in the 2020 Call for sites	We are not aware of proposals to re-develop this site at this time and limited evidence has been provided to support this. We have no evidence to suggest that the site is deliverable in the Plan period. Site is considered to be unavailable.
Kentish Town Station	Nominated in the 2020 Call for sites	Whilst improvements to the station are planned, we are not aware of proposals to re-develop the station at this time and limited evidence has been provided to support this. We have no evidence to suggest that the site is deliverable in the Plan period. Site is considered to be unavailable.
Priory Tavern, 250 Belsize Road	Nominated in the Call for sites 2021/2022	Limited development potential / no residential proposed. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Concrete Works, King's Cross	Nominated in the Call for sites 2021/2022	Policy conflict – designated aggregates safeguarding area

Ramsey Hall, 20 Maple St	Nominated in the Call for sites 2022	Limited development potential without demolition - policy conflict. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
118 - 124 Charing Cross Road	Nominated in the Call for sites 2022	Limited development potential / no residential proposed. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
St Dominic Primary School, Southampton Road Camden	Nominated in the Call for sites 2022	Limited development potential - site proposed to remain as a school

Additional sites considered as part of the preparation of the Proposed Submission Local Plan 2025 (Regulation 19 version) but not included as allocations are listed below.

Site Name	Site identification source	Reason why the site was not included in the Proposed Submission Local Plan
1 Barnaby Street (adjacent to Euston Station)	Nominated in the Call for sites 2024	Within Euston Area Plan area
Darwin Court, Gloucester Avenue	Nominated in the Call for sites 2024	Limited development potential without demolition - policy conflict. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Trinity Court, Grays Inn Road	Nominated in the Call for sites 2024	Limited development potential without demolition - policy conflict. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Endsleigh Court, 24 Upper Woburn Place	Nominated in the Call for sites 2024	Limited development potential without demolition - policy conflict. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.

Site Name	Site identification source	Reason why the site was not included in the Proposed Submission Local Plan
Clare Court, Judd Street	Nominated in the Call for sites 2024	Limited development potential without demolition - policy conflict. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.
Witley Court, Coram Street	Nominated in the Call for sites 2024	Limited development potential without demolition - policy conflict. The scale of development that can be achieved here is considered to be beneath the threshold for allocation in the Plan.

To inform the preparation of the Local Plan we also commissioned a Gypsy and Traveller Site Identification Study to identify Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers. The Study identified a shortlist of 18 parcels of land that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council.

Further assessment of the 18 parcels of land identified found that:

- The following parcels were unavailable as they had either been sold, are leased by the Council to tenants (on long leases) or are subject to re-development plans:
 - Land between 23 and 25 Ravenshaw Street
 - Athlone Street garages
 - Garages at Spencer Rise
 - Sanderson Close parking
 - Former depot off Arlington Road
 - Camley Street Industrial Estate
 - West Kentish Town Estate

- The following parcels were unsuitable due access constraints, an unacceptable degree of overlooking, sites being used as amenity space / space for food growing, loss of parking, and loss of servicing for retail units:
 - Frideswide Place
 - Land at 177 Finchley Road
 - Parking rear of Agar Grove (Parcel 1 and 2)
 - Land south of 60 Bassett Street
 - Land at Sidney Boyd Court
 - Land at St Mary's Mews (Parcel 1 and 2)
 - Land rear of 6-8 Acol Road

These sites have therefore been discounted and are not considered to be reasonable alternatives.