

Strategic Environmental Assessment (SEA) of the Kentish Town Neighbourhood Plan



Environmental Report (Update)

November 2015

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AECOM Infrastructure & Environment UK Limited

6-8 Greencoat Place

London, SW1P 1PL

Telephone: +44(0)20 7798 5000

Fax: +44(0)20 7798 5001

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM (formally URS) is commissioned to undertake Strategic Environmental Assessment (SEA) in support of the emerging Kentish Town Neighbourhood Development Plan (NDP). The NDP is being prepared, using the powers in the Localism Act 2011, by a Neighbourhood Development Forum which was established in January 2012 and recognised by Camden Council in May 2013. The NDP, once adopted, will present planning policy and guidance for the neighbourhood area. Alongside the London Plan and the Camden Council Local Plan it will provide a framework for determining planning applications up to 2030.

2 SEA EXPLAINED

- 2.1.1 SEA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse environmental effects and maximising the positives. SEA of the NDP is a legal requirement.¹
- 2.1.2 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the European SEA Directive.²
- 2.1.3 In-line with the Regulations, a report (**the 'Environmental Report'**) must be published for consultation alongside the draft plan that presents information on the likely significant effects of implementing the plan and reasonable alternatives, as well as certain other specified information.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

3 THIS ENVIRONMENTAL REPORT

- 3.1.1 This document is the Environmental Report for the Kentish Town NDP and hence must provide certain specified information. Essentially, there is a need to answer four questions:
1. What's the scope of the SEA?
 - Parameters for the SEA must be established through 'scoping' work at the outset.
 2. What has plan-making / SEA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SEA iteration. 'Reasonable alternatives' must have been assessed.
 3. What are the SEA findings at this stage?
 - i.e. in relation to the draft plan.
 4. What happens next (including monitoring)?
- 3.1.2 Each of the questions is answered in turn below. **Table 3.1** explains more about the regulatory basis for answering these questions.

The Environmental Report Update

- 3.1.3 This is the second time that the Environmental Report has been published, and hence is referred to as an 'update' to the Environmental Report. The extent of updates that have been made, since the Environmental Report was last published in March 2015, is limited. This approach reflects time and resources available and also a view that the Environmental Report has already served its purpose (i.e. has already been published for consultation alongside the draft plan and informed subsequent plan-making). Updating efforts have been targeted, as explained by **highlighted text** at the beginning of relevant sections below.

¹ SEA is not an automatic requirement for NDPs. Rather, SEA is a requirement where an initial 'screening' assessment identifies the potential for the NDP to result in significant environmental effects.

² Directive 2001/42/EC

³ Schedule 2 of the Regulations lists the information that must be presented in the Environmental Report.

Table 3.1: Questions answered by the Environmental Report, in-line with Regulatory⁴ requirements

ENV REPORT QUESTION		IN LINE WITH REGULATIONS THE REPORT MUST INCLUDE...
What's the scope of the SEA?	What's the plan seeking to achieve?	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making / SEA involved up to this point?		- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
What are the SEA findings at this current stage?		- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
What happens next?		A description of the monitoring measures envisaged

N.B. The right-hand column of Table 3.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

PART 1

WHAT IS THE SCOPE OF THE SEA?

4 INTRODUCTION TO PART 1

No substantive updates have been made to this part of the report, since the Environmental Report was published alongside the previous (pre-submission) version of the plan.

4.1.1 This part of the report aims to introduce the reader to the scope of the SEA. In particular, and as required by the Regulations, this chapter answers the series of questions:

- What is the plan seeking to achieve?
- What is the 'context'?
- What is the 'baseline'?
- What are the key issues and objectives that should be a focus of SEA?

4.1.2 **Chapter 5** answers the first question by listing the objectives of the NDP. The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following ten sustainability 'topics':

- | | |
|---|--|
| • Air quality and noise | • Heritage |
| • Biodiversity | • Housing |
| • Climate change mitigation (non-transport related) | • Landscape / townscape |
| • Community and well-being | • Transport |
| • Economy | • Water, flood risk and other climate change adaptation issues |

4.1.3 The ten sustainability topics were identified in-light of: 1) The 'issues' suggested by the SEA Regulations;⁵ 2) the list of objectives used by Camden Council as part of Sustainability Appraisal (SA) work for their Core Strategy;⁶ and 3) an understanding of the Kentish Town NDP objectives (i.e. an understanding of the 'plan scope').

4.1.4 Rather than focusing strictly on the environment, **the topics cover all three 'pillars' of sustainable development**, i.e. the environmental, social and economic pillars. This is appropriate given that sustainable development is a stated objective for Neighbourhood Development Plans.⁷ It is also appropriate in that the SEA Regulations refer to 'sustainable development' and imply that 'the environment' should be conceived of in a broad sense.

4.1.5 Extending the scope of SEA to give equal prominence to issues across the three pillars of sustainable development is the approach taken for Local Plans. For Local Plans the process is referred to as Sustainability Appraisal (SA).

4.2 Consultation on the scope

4.2.1 The Regulations require that "When deciding on the scope and level of detail of the information that must be included in the Environmental Report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁸ As such, these authorities were consulted on the SEA scope in early 2015. London Borough of Camden was also consulted. Notably, Natural England responded by highlighting the need to plan for green infrastructure / ecological networks in a specific manner. This matter is considered further below.

⁵ Schedule 2 suggests a focus on 'issues such as' biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, and landscape. All of these issues are reflected clearly in the list of topics, with the exception of 'soil'. 'Soil' is not assigned a standalone topic on the basis that the NDP area does not include agricultural land.

⁶ See <http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/planning-consultations/filestorage/scoping-report-of-sustainability-appraisal.en> (accessed 03/14). **Appendix II** lists the Camden SEA/SA objectives in full.

⁷ At Examination all NDPs must demonstrate that they meet the 'basic condition' of contributing to sustainable development.

⁸ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The Environmental Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.

5.1.1 The purpose of the Kentish Town NDP is to provide a strategic and long-term plan for the area that is in accordance with the wishes of those living and working in the area, recognising the need for sustainable development.

5.1.2 The aim is for development in Kentish Town to further the social, economic and environmental well-being of individuals, businesses and organisations living and working within the Forum Area. The Area has a strong character as one of London's old villages, with a diverse population, a reasonably thriving high street, a young population and excellent links with the rest of London and proximity to major tourist attractions, parks and employment centres. The NDP will seek to reinforce these positive aspects of the area and create a framework for continuing regeneration and growth of the Area over the next 15 years.

5.1.3 A number of objectives are established for the NDP, grouped under the following headings:

1) Shopping and Working

2) Design

3) Getting Around

4) Green and Open Spaces

5) Community and Culture

6) Spatial policies

a) Support the development of a Kentish Town Square to restore quality to the heart of the neighbourhood.

b) Promote a coordinated redevelopment of the Kentish Town Potential Development Area, the largest significant potential development site in the KTNF area, comprising the Regis Road Site, the Murphy Site and the area backing onto Highgate Road.

7) Site Specific Policies.

5.2 What is the plan not seeking to achieve?

5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the development management process). The strategic nature of the plan is reflected in the scope of the SEA.

6 WHAT IS THE 'CONTEXT'?

The Environmental Report must include...

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate scope of an SEA involves reviewing context messages in relation to: broad problems / issues; and objectives, i.e. 'things that are aimed at or sought'. Messages from the review are presented below under the topic headings introduced above. Specific consideration is given to international and national context messages, in-line with requirements.⁹ National context messages are established first and foremost by the National Planning Policy Framework (NPPF),¹⁰ but there a need to also 'cast the net wider'.

6.2 Air quality and noise

European context

6.2.1 The EU Thematic Strategy on Air Pollution¹¹ aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).

National Planning Policy Framework (NPPF)

6.2.2 Key messages include:

- A Core Planning Principle is to take account of and support local strategies to improve health, social and cultural well-being for all.
- Plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas.
 - The Air Quality Strategy sets health-based objectives for nine main air pollutants. Performance against these objectives is monitored where people are regularly present and might be exposed to air pollution.¹²
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- Planning policies should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life.

Supplementing the NPPF

6.2.3 The Defra report Action for air quality in a changing climate focuses on the synergies between the two issues of air quality and climate change. It notes the potential for health benefits through the closer integration of climate and air pollution policy. Benefits can be realised through promoting low-carbon vehicles and renewable energy.¹³

⁹ Schedule II(e)

¹⁰ DCLG (2012) National Planning Policy Framework [online] available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹¹ Commission of the European Communities (2005) Thematic Strategy on air pollution [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2005:0446:FIN:EN:PDF> (accessed 01/15)

¹² Defra (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at: <http://www.defra.gov.uk/environment/quality/air/air-quality/approach/> (accessed 01/15)

¹³ Defra (2010) Air Pollution: Action in a Changing Climate [online] available at: <http://www.defra.gov.uk/publications/files/pb13378-air-pollution.pdf> (accessed 01/15)

London specific context

- 6.2.4 The Mayor's Air Quality Strategy notes that air pollution harms both the environment and health, with its impacts felt most severely by vulnerable people such as children and older persons. The strategy promotes: reducing emissions from transport; homes, business and industry; and increasing awareness of air quality. A priority is to achieve in EU limit values for PM₁₀ and NO₂ across Greater London.¹⁴
- 6.2.5 The London Plan seeks to ensure that development and land use contributes towards Air Quality Strategy objectives. Proposals should:¹⁵
- Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within AQMAs;
 - Promote sustainable design and construction to reduce emissions from demolition and construction; and
 - Be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality.
- 6.2.6 The Mayor's Ambient Noise Strategy focuses on reducing noise through better management of transport systems, better town planning and better design of buildings. The key aim is to minimise the adverse impacts of noise on people living and working in, and visiting London.¹⁶

Camden specific context

- 6.2.7 The Camden Air Quality Action Plan 2013-2015 presents a revised and updated Clean Air Action Plan (CAAP) for Camden, bringing together a variety of actions to help reduce key air pollutants in Camden. The Plan includes four main areas of activity:¹⁷
- Reducing transport emissions
 - Reducing emissions associated with new development
 - Reducing emissions from gas boilers and industrial processes
 - Awareness-raising and partnership working (e.g. schools and businesses).

6.3 Biodiversity and green infrastructure

European context

- 6.3.1 The EU Sustainable Development Strategy, adopted in 2006, included an objective to halt the loss of biodiversity by 2010.¹⁸ An EU Biodiversity Strategy¹⁹ was then adopted in May 2011 in order to deliver on the established Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.

¹⁴ GLA (2010) Clearing the air: The Mayor's Air Quality Strategy [online] available at:

http://www.london.gov.uk/sites/default/files/Air_Quality_Strategy_v3.pdf (accessed 01/15)

¹⁵ GLA (2011) The London Plan: Spatial Development Strategy for Greater London [online] available at:

<http://www.london.gov.uk/priorities/planning/publications/the-london-plan> (accessed 01/15)

¹⁶ GLA (2004) The Mayor's Noise Strategy [online] available at: <http://static.london.gov.uk/mayor/strategies/noise/> (accessed 01/15)

¹⁷ LB Camden (2013) Air Quality Action Plan 2013-2015 [online] available at: <http://www.camden.gov.uk/ccm/content/environment/air-quality-and-pollution/air-quality/twocolumn/policies-reports-and-research.en?page=3> (accessed 01/15)

¹⁸ Council of the European Union (2006) The EU Sustainable Development Strategy [online] available at:

<http://register.consilium.europa.eu/pdf/en/06/st10/st10117.en06.pdf> (accessed 04/13)

¹⁹ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at:

http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf (accessed 04/13)

National Planning Policy Framework (NPPF)

6.3.2 Key messages include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Protect internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Promote the 'preservation, restoration and recreation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Account for the long-term effects of climate change. Adopt proactive strategies to adaptation and manage risks through measures including multifunctional green infrastructure (giving consideration to 'ecological networks').
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'.

Supplementing the NPPF

- 6.3.3 The Natural Environment White Paper (NEWP) sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It signals a move away from the traditional approach of protecting biodiversity in nature reserves. The NEWP recognises green infrastructure as 'one of the most effective tools available' to manage 'environmental risks such as flooding and heat waves'.²⁰ The proposals set out in the NEWP are directly linked to the ground breaking research in the National Ecosystem Assessment (NEA), a major project that was able to draw conclusions on the 'substantial' benefits that ecosystems provide to society directly and through supporting economic prosperity.²¹
- 6.3.4 Wildlife Trust 'Living Landscape' initiatives focus on conserving biodiversity over large areas of land where habitats are fragmented. Specifically: Protect and maximise the value of areas that are already rich in wildlife; Expand, buffer, and create connections and stepping stones between these areas; and Make the wider landscape more permeable to wildlife.²² The Wildlife Trusts (with the TCPA) have also produced guidance on 'Planning for Biodiversity'. It notes that as well as benefiting biodiversity, green infrastructure can help to *'deliver some of the services currently provided by hard engineering techniques'*.²³
- 6.3.5 The TCPA report Creating Garden Cities and Suburbs Today calls for at least 40% of a new community's total area to be allocated to green space. These spaces should be of a range of types and be multifunctional; for instance as areas that can be used for walking and cycling, recreation and play, supporting of wildlife, or forming an element of an urban cooling and flood management system.²⁴ Recommendations on how to achieve the delivery of such spaces are made in the Landscape Institute Position Statement on Green Infrastructure. Recommendations include: Making developers aware of strategic GI goals and the potential to mitigate the environmental impacts of new development and create beautiful places.²⁵

²⁰ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf> (accessed 04/13)

²¹ UNEP-WCMC (2011) UK National Ecosystem Assessment [online] available at: <http://uknea.unepwcmc.org/Resources/tabid/82/Default.aspx> (accessed 04/13)

²² The Wildlife Trusts (2010) A Living Landscape: play your part in nature's recovery [online] available at: <http://www.wildlifetrusts.org/aliveinglandscape> (accessed 04/13)

²³ The Wildlife Trusts and TCPA (2012) Planning for a healthy environment: good practice for green infrastructure [online] available at: <http://www.wildlifetrusts.org/news/2012/07/06/planning-healthy-and-natural-environment> (accessed 01/15)

²⁴ TCPA (2012) Creating garden cities and suburbs today [online] available at: http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today.pdf (accessed 01/15)

²⁵ Landscape institute (2013) Green Infrastructure: An integrated approach to land use [online] available at: <http://www.landscapeinstitute.org/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf> (accessed 01/15)

6.3.6 In 'Safeguarding our Soils: A strategy for England', a vision is set out for the future of soils in the Country. Good quality soils in urban areas are recognised as being vital in supporting ecosystems, facilitating drainage and providing urban green spaces for communities. Preventing the pollution of soils and addressing the historic legacy of contaminated land is another element of the report's vision.²⁶

6.3.7 Natural England, through the consultation on the SEA scope, highlighted the importance of achieving ecological networks through achieved through green chains/links/corridors which not only act as species corridors, but can link fragmented green spaces, provide opportunities for walking and cycling.

London specific context

6.3.8 The London Plan notes that priority should be given to sites which assist in achieving the targets in Biodiversity Action Plans (BAPs) and sites within or near to areas deficient in accessible wildlife sites. Sites of Metropolitan Importance for Nature Conservation (SMIs), in addition to internationally and nationally designated sites, include land of strategic importance for nature conservation and biodiversity across London. Where development is proposed which would affect an SMI the approach should be to seek to avoid adverse impact, and if that is not possible, to minimise such impact and seek mitigation of any residual impacts. Compensation should be a last resort.²⁷

Camden specific context

6.3.9 The Camden Biodiversity Action Plan 2013-2018 sets out to deliver biodiverse urban greening through land management, the planning process and bespoke projects to address climate change and flood risk. The strategy also seeks to link closely to health and well-being priorities in the borough. The BAP has three key areas of focus: Access to Nature; The Built Environment (which can contribute to green infrastructure); and Management of open Spaces and Natural Habitats.²⁸

6.4 Climate change mitigation (non-transport related)

6.4.1 Issues relating to 'sustainable transport' (i.e. reducing car dependency and encouraging walking, cycling and use of public transport) are central to any consideration of climate change mitigation, but are considered under a stand-alone topic, below.

European context

6.4.2 In its 2007 strategy on climate change, the European Commission assesses the costs and benefits of combating climate change and recommends a package of measures to limit global warming to 2° Celsius.²⁹ On energy, the Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.

National Planning Policy Framework (NPPF)

6.4.3 Key messages include:

- Support transition to a low carbon future in a changing climate as a 'core principle'.

²⁶ Defra (2009) Safeguarding our Soils: A strategy for England [online] available at:

<http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf> (accessed 01/15)

²⁷ GLA (2011) The London Plan: Spatial Development Strategy for Greater London [online] available at:

<http://www.london.gov.uk/priorities/planning/publications/the-london-plan> (accessed 01/15)

²⁸ LB Camden (2013) Camden Biodiversity Action Plan 2013-2018 [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset/?asset_id=3132995 (accessed 01/15)

²⁹ Commission of the European Communities (2007) Limiting Global Climate Change to 2 degrees Celsius: The way ahead for 2020 and beyond [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF> (accessed 01/15)

- There is a key role for planning in meeting the targets set out in the Climate Change Act 2008³⁰. Specifically, policy should support the move to a low carbon future through:
 - planning for new development in locations and ways which reduce GHG emissions;
 - actively supporting energy efficiency improvements to existing buildings;
 - setting requirements consistent with Government's zero carbon buildings policy;
 - positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - encouraging those transport solutions that support reductions in greenhouse gas emissions and reduced congestion.

Supplementing the NPPF

- 6.4.4 In the guidance document How local authorities can reduce emissions and manage climate risk planning functions are described as being a 'key lever in reducing emissions, with it considered particularly important that local authorities use these to:³¹
- Enforce energy efficiency standards in new buildings and extensions;
 - Reduce transport emissions by ensuring they are well served by public transport;
 - Work with developers to make renewable energy projects acceptable to communities; and
 - Plan for infrastructure such as low-carbon district heating networks.
- 6.4.5 With regards to low-carbon district heating networks, the DECC report the Future of Heating points out that around half (46%) of the final energy consumed in the UK is used to provide heat. Renewable heat currently represents 1% of heat generation, but Government's vision is of: *buildings benefiting from a combination of renewable heat in individual buildings, particularly heat pumps, and heat networks distributing low carbon heat to communities.*³²
- 6.4.6 In-line with the mandatory requirements of the Waste Framework Directive, the Waste Management Plan for England includes analysis of:³³
- Measures to increase re-use, recycling, recovery and disposal of waste.
 - Planned waste management technologies and methods, with specific consideration given to: measures to promote high quality recycling, including the setting up of separate collections of waste; and measures to encourage the separate collection of bio-waste.

London specific context

- 6.4.7 The London Plan seeks to achieve an overall reduction in London's carbon dioxide emissions of 60% (below 1990 levels) by 2025. The Plan sets out a range of policies to underpin London's response to climate change, including calls for: 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025, with decentralised heating and cooling networks and Combined Heat and Power (CHP) to be prioritised; and encouragement for innovative technologies e.g. electric and hydrogen fuel cell vehicles, and hydrogen supply and distribution infrastructure.³⁴

³⁰ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.

³¹ Committee on Climate Change (2012) How local authorities can reduce emissions and manage climate risk [online] available at: http://hmccc.s3.amazonaws.com/Local%20Authorities/1584_CCC_LA%20Report_bookmarked_1b.pdf (accessed 01/15)

³² DECC (2012) The Future of Heating: A strategic framework for low carbon heat in the UK [online] available at: <http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/heat/4805-future-heating-strategic-framework.pdf> (accessed 01/15)

³³ Defra (2013) Waste Management Plan for England [online] available at: <https://www.gov.uk/government/publications/waste-management-plan-for-england> (accessed 01/15)

³⁴ GLA (2011) The London Plan: Spatial Development Strategy for Greater London [online] available at: <http://www.london.gov.uk/priorities/planning/publications/the-london-plan> (accessed 01/15)

- 6.4.8 The Mayor's municipal waste management strategy aims to:³⁵
- Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste;
 - Minimise the impact of municipal waste management on the environment and reduce its carbon footprint; and
 - Unlock the economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of low carbon energy from waste.
- 6.4.9 Key targets for the management of London's municipal waste are as follows:
- Achieve zero municipal waste direct to landfill by 2025
 - Reduce the amount of household waste produced from 970 kg per household in 2009/10 to 790 kg per household by 2031. This is equivalent to a 20% reduction per household
 - Increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 20,000 tonnes a year in 2015 and 30,000 tonnes a year in 2031
 - Recycle or compost at least 45 per cent of municipal waste by 2015, 50% by 2020 and 60% by 2031
 - Cut London's greenhouse gas emissions through the management of municipal waste, achieving annual greenhouse gas emissions savings of approximately: 545,000 tonnes of CO₂eq in 2015; 770,000 tonnes of CO₂eq in 2020; 1,000,000 tonnes of CO₂eq in 2031
 - Generate as much energy as practicable from London's organic and non-recycled waste in a way that is no more polluting in carbon terms than the energy source it is replacing.

Camden specific context

- 6.4.10 Camden's Environmental Sustainability Plan (2011-2020) pledges to, amongst other things, support the local green economy; and to engage and empower communities to take responsibility for their own environmental impacts. The strategies key goals are to:³⁶
- Reduce carbon emissions from 2005 levels by 10% by 2012; and by 40% by 2020; and contribute to Government targets to reduce carbon emissions by 80% by 2050 from 1990 levels.
 - Contribute to a North London recycling and composting rate of 50% by 2020, up from 30% (Camden) levels in 2009-10.
 - Reduce residual household waste from 2008/09 levels by 15% by 2020.

6.5 Community and well-being

National Planning Policy Framework (NPPF)

- 6.5.1 Key messages include:
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
 - A core planning principle is to 'take account of and support local strategies to improve health, social and cultural well-being for all'.
 - Facilitate social interaction and creating healthy, inclusive communities'.

³⁵ GLA (2011) London's wasted resource: The Mayor's municipal waste management strategy [online] available at: <http://www.london.gov.uk/priorities/environment/publications/the-mayors-waste-management-strategies> (accessed 01/15)

³⁶ LB Camden (2012) Green Action for Change – Camden's environmental sustainability plan [online] available at: <http://www.camden.gov.uk/ccm/content/environment/green/green-action.en> (accessed 01/15)

- Promote retention and development of community services / facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set strategic policy to deliver the provision of health facilities.
- Sufficient choice of school places is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach'.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the local 'individuality'.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
- Prevent new or existing development from being 'adversely affected' by soil pollution or land instability and be willing to remediate and mitigate 'where appropriate'.

Supplementing the NPPF

- 6.5.2 A supplementary report to Fair Society, Healthy Lives ('The Marmot Review') investigated health inequalities in England considered links between spatial planning and health on the basis that there is: *'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'*.³⁷ Key policy actions are to:
- Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality;
 - Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: improving active travel; improving open and green spaces; improving the quality of food in local areas; and improving the energy efficiency of housing; and
 - Support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation.
- 6.5.3 The Department of Health Guidance on 'Health in SEA' suggests the use of a broad definition of 'health,' taking into account social determinants. This implies that plans and programmes may be able to influence health in many ways, both directly and indirectly, and will often be synergistic, with different factors combining to bring benefits or adverse impacts.³⁸ The TCPA report Planning Healthier Places notes that an emphasis on financial viability in planning decisions can underplay the long-term costs to the public purse that are incurred if populations are unhealthy because of the places where they live. It states that there needs to be new engagement between planners, developers and communities to identify how the evidence-based health benefits of investing for the long term can be factored-in.³⁹
- 6.5.4 The Select Committee on Public Service and Demographic Change report 'Ready for Ageing?' warned that society is underprepared for the ageing population. Key projections about ageing include 101% more people aged 85 and over in England in 2030 compared to 2010; and a 90% increase in people with moderate or severe need for social care. Organisations involved in urban planning will need to adjust to an older population. The housing market is delivering much less specialist housing for older people than is needed.⁴⁰

³⁷ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf> (accessed 01/15)

³⁸ Department of Health (2007) Draft Guidance on Health in Strategic Environmental Assessment [online] available at: <http://www.apho.org.uk/resource/item.aspx?RID=47085> (accessed 01/15)

³⁹ TCPA (2013) Planning Healthier Places [online] available at: http://www.tcpa.org.uk/data/files/Planning_Healthier_Places.pdf (01/15)

⁴⁰ Select Committee on Public Service and Demographic Change (2013) [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> (01/15)

- 6.5.5 The RIBA City Health Check report assesses the impact of urban design and architecture on public health, through evidence from the nine most populated cities in England. The report shows a clear link between green space and health outcomes, with the less healthy areas tending to have a higher density of housing and a lower proportion of green space.⁴¹ Similarly, the report Natural Solutions looks to highlight evidence from recent studies that demonstrate the important role that the natural world can play in delivering well-being. It points to the relationship between access to nature and both physical and mental health benefits. The natural environment is also described as potentially being a resource to help reduce crime levels and increase community cohesion by providing a neutral space in which people can meet and interact. In addition, green spaces can provide environments for effective learning, with this particularly being the case for children not engaged in formal learning.⁴² Also of note is the Environmental Audit Committees report Sustainable Food, which recommends that Local Policies should provide communities with open space to grow their own.⁴³

London specific context

- 6.5.6 The London Plan sets out a strategic goal of ensuring equal life chances for all Londoners. The Plan notes that development proposals should 'protect and enhance facilities and services that meet the needs of particular groups and communities'. Developments which provide high quality social infrastructure, including education, skills and sports facilities are to be supported, and those which involve their net loss should be resisted. Equally, development should improve access to, for example, social and community infrastructure, local shops, employment opportunities, commercial services and public transport. Inclusive design should also be adopted to take into account the needs of older and disabled people.⁴⁴

Camden specific context

- 6.5.7 The Camden Plan 2012-2017 establishes the following 'ambition' for Camden: Camden is the beating heart of London – one of the most diverse places in the capital and the country. Stretching from Covent Garden to Hampstead and Highgate, it contains some of the poorest and some of the wealthiest neighbourhoods in London. This diversity is at the centre of our ambition – for Camden to be a place where everyone has a chance to succeed and where nobody gets left behind. We want to reduce inequality while preserving the social mix, by building resilience in individuals, communities, businesses and the Council itself.⁴⁵
- 6.5.8 Change for Children and Families sets out how the children's trust will work together to improve outcomes for children and young people in Camden. Key priorities are agreed in partnership by the local authority, schools, health services, police and other agencies, including the voluntary and community sector. Priorities are: A long-term goal to eliminate child poverty and mitigate its impact on children and families; Children and young people have a healthy weight and healthy attitude to food and exercise; and Improve outcomes for vulnerable children and young people, including looked-after children, those with special educational needs and / or a disability.⁴⁶
- 6.5.9 Also of note is the Camden Community Safety Partnership, which has four priorities:⁴⁷ Antisocial behaviour; Domestic and sexual violence; Night time economy; and Serious youth violence and drugs.

⁴¹ RIBA (2013) City Health Check, How design can save lives and money [online] available at:

<http://www.architecture.com/Files/RIBAHoldings/PolicyAndInternationalRelations/Policy/PublicAffairs/RIBACityHealthCheck.pdf>

⁴² NEF (2012) Natural Solutions [online] available at: <http://www.neweconomics.org/publications/entry/natural-solutions>

⁴³ Environmental Audit Committee (2012) Sustainable Food [online] available at:

<http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenvaud/879/87902.htm> (accessed 01/15)

⁴⁴ GLA (2011) The London Plan: Spatial Development Strategy for Greater London [online] available at:

<http://www.london.gov.uk/priorities/planning/publications/the-london-plan> (accessed 01/15)

⁴⁵ LB Camden (2012) Camden Plan 2012-2017 [online] available at: <http://www.camden.gov.uk/ccm/navigation/council-and-democracy/camden-plan/strategies-and-partnerships/> (accessed 01/15)

⁴⁶ <http://www.camden.gov.uk/ccm/navigation/community-and-living/your-local-community/children-and-young-people-s-partnership/plan/>

⁴⁷ See <http://www.camden.gov.uk/ccm/content/council-and-democracy/plans-and-policies/camden-strategies-%26-partnerships/safer-camden-strategy.en> (accessed 01/15)

6.6 Economy

European context

- 6.6.1 In 2010, the European Union published its strategy for achieving growth up until 2020. This strategy focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient economy; and inclusive growth, aimed at strengthening employment, and social and territorial cohesion.⁴⁸

National Planning Policy Framework (NPPF)

- 6.6.2 Key messages include:

- The planning system can make a contribution to building a strong, responsive economy by 'ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure'.
- Capitalise on 'inherent strengths', and meet the 'twin challenges of global competition and of a low carbon future'.
- Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- Support competitive town centre environments, including where there are active markets. Edge of town developments should only be considered where they have good access and there will not be detrimental impact to town centre viability in the long term.

Supplementing the NPPF

- 6.6.3 The Local Growth White Paper notes that Government interventions should support investment that will have a long term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. Economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings, whilst also focused on businesses that can compete internationally.⁴⁹
- 6.6.4 In order to revitalise town centres and high streets it is necessary to reimagine these places, ensuring that they offer something new and different that neither out-of-town shopping centres nor the internet can offer. Town centres, high streets and also lower order retail and service facilities can support economic resilience, act as a 'hub' for local communities, and play an important role in the shopping hierarchy because of their accessibility. Local policies should look to 'reinforce local distinctiveness and community value, and develop the social function with a view to underpinning ongoing commercial viability'. For example, consider how local parades can provide a 'seed-bed' function for start-up businesses.^{50 51}

⁴⁸ European Commission (2010) Europe 2020: A strategy for smart, sustainable and inclusive growth [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:EN:PDF> (accessed 01/15)

⁴⁹ BIS (2010) Local Growth: Realising every place's potential [online] available at: <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961> (accessed 01/15)

⁵⁰ CLG (2012) High streets at the heart of our communities: The Government's response to the Mary Portas Review [online] available at: <http://www.communities.gov.uk/publications/regeneration/portasreviewresponse> accessed 01/15

⁵¹ DCLG (2012) Parades of shops: towards an understanding of performance and prospects [online] available at: <http://www.communities.gov.uk/documents/regeneration/pdf/2156925.pdf> (accessed 01/15)

London specific context

- 6.6.5 The Mayor's Economic Development Strategy sets out to: Promote London as the world capital of business, the world's top international visitor destination, and the world's leading international centre of learning and creativity; Make London one of the world's leading low carbon capitals by 2025; Give all Londoners the opportunity to take part in London's economic success, access sustainable employment, and progress in their careers; Attract the investment in infrastructure and regeneration which London needs and maximise its benefits.⁵²
- 6.6.6 The London Plan calls for the scale of new retail, commercial, culture and leisure developments within town centres to reflect the size, role and function of that centre. Such development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres which are, or can be, well integrated with the existing centre and public transport. The protection of small businesses is also a focus, with the Plan recognising that large retail developments can squeeze out small businesses.⁵³

Camden specific context

- 6.6.7 The Camden Employment Land Review draws a number of key conclusions, including:
- Protect existing offices in the central London Area and do all it can to encourage the development of new offices there.
 - Protect existing industrial/warehousing sites and areas which remain fit for market.
 - Create opportunities for small-scale industrial development.
- 6.6.8 The last two points are of particular relevance to the Kentish Town Neighbourhood Plan, given that the plan area contains the only area of land in Camden to have a mix of industrial and warehousing uses and no housing. **Box 6.1** considers the policy context further.

⁵² GLA (2010) Mayor's Economic Development Strategy [online] available at: <http://www.london.gov.uk/priorities/business-economy/publications/economic-development-strategy> (accessed 01/15)

⁵³ GLA (2011) The London Plan: Spatial Development Strategy for Greater London [online] available at: <http://www.london.gov.uk/priorities/planning/publications/the-london-plan> (accessed 01/15)

Box 6.1. Light Industry and warehousing in London

The **adopted Camden Core Strategy** includes a discussion on ‘Industrial and light-industrial premises’ that begins by highlighting that Camden has one of the lowest stocks of industrial and warehousing space among London boroughs. It references the Camden Employment Land Review, which finds that the cost of industrial locations in Camden is high, indicating supply not meeting demand, and highlights that there is pressure to redevelop industrial land for higher value uses, principally housing. The plan also explains that –

- Camden has strong trading links with London’s Central Activities Zone (CAZ) and that if industrial and warehousing businesses are not available in Camden these types of services will increasingly be located further away from central London, with increases in travel and congestion and a potentially negative economic effect on important central London functions.
- Employees of the industrial, manufacturing and warehousing sectors are those who would otherwise be at high risk of being unemployed or workless, given that the skills required for these sectors are fundamentally different from other sectors with similar qualification level requirements, e.g. retail.

In response to the factors outlined above, the adopted Local Plan seeks to continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use. This approach is in-line with the Mayor of London’s Land For Industry and Transport Supplementary Planning Guidance, which recognises the limited amount of industrial land relative to demand in Camden and so includes the borough in the “Restricted Transfer” indicating the need for a restrictive approach to change of use.

Since the time of the Core Strategy’s adoption there has been a shift in policy, driven primarily by the need to meet the ambitious housing targets and new policy established by **the Further Alterations to the London Plan** (FALP). The new FALP policy (para 4.23) is that high density housing development should be supported on surplus industrial land around public transport nodes.

The new London Plan policy is reflected in the **emerging Camden Local Plan** (draft, 2015). There is now a policy on ‘Maximising Housing Supply’, as part of which there is clear support for redeveloping underused sites for housing where they are suitable in terms of accessibility and amenity. The emerging policy for Regis Road, within the Kentish Town Industrial Area, is that there should be comprehensive redevelopment that delivers a large amount of housing alongside community uses and a substantial increase in jobs. As part of this, there should be provision of appropriate employment space for identified growth sectors and small to medium enterprises and start-ups; and existing industrial and warehouse businesses should be retained where they support the CAZ.

There is currently active **debate** regarding the London-wide trend towards redeveloping industrial areas for mixed-use development. Notably, Ferm and Jones (2015)^[1] have *“grappled with the divisive question of whether or not the continued separation of industrial land is desirable [and] asked, whether it is possible, through clever urban design, to accommodate businesses currently occupying industrial land within a higher density mixed use context.”*

Ferm and Jones conclude that: *“The ongoing loss of industrial land is being driven largely by real estate speculation rather than deindustrialisation. Evidence for the actual state of industrial land - who does business there, how those businesses are linked together and embedded in the places they occupy - is thin on the ground. This lack of information means the impact of this loss of industrial land is a worrying mystery; the current move away from separating industrial land towards mixed use in London’s built environment – both on ideological grounds and in response to housing need – needs to be much better understood. There is an urgency to this. The UK Government has proposed^[2] to further deregulate the planning system to facilitate conversion of industrial land to housing without the need for planning permission. Concern is particularly acute in London where differences between industrial and residential land values are likely to drive redevelopment if Permitted Development Rights are extended.”*

The ‘ideological argument’ against separating industrial from other land uses suggests that such zoning does not support compact, diverse and vibrant city environments. This resonates with the views of the Deputy Mayor for Business and Enterprise, who Ferm and Jones quote as stating: *“The idea of an industrial park is really a Modern phenomenon... what we will return to is a 19th Century model, where industry is mixed around housing.”* In response, Ferm and Jones state that they have *“sympathy with the position of urbanists and economists who deride the concept of land use separation in the modern urban context [but] feel that in London at least the imbalance of land values and the strength of the residential property market means that we now have little alternative.”*

^[1] Ferm, J and Jones, E (February, 2015) London’s industrial land: Cause for concern? University College London Working paper [online] available at: <https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf>. Also, see ‘The end of industry in London? A report by Jenny Jones, Green Party Member of the London Assembly’ (February, 2015) available at: http://www.london.gov.uk/sites/default/files/The_end_of_industry_in_London_Feb_2015.pdf

^[2] DCLG (Department for Communities and Local Government). Technical consultation on planning, July 2014.

6.7 Heritage

National Planning Policy Framework (NPPF)

6.7.1 Key messages include:

- Set strategic policy to deliver conservation and enhancement of the natural and historic environment, including landscape.
- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' and recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk. Look for opportunities within Conservation Areas, and within the settings of heritage assets, to enhance or better reveal their significance.

Supplementing the NPPF

6.7.2 The Government's Statement on the Historic Environment for England calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.⁵⁴ Similarly, 'Understanding Place' aims to relate the designation and management of Conservation Areas to the principles of conservation management planning for historic areas, and outlines how management of conservation areas relates to wider planning.⁵⁵

6.7.3 English Heritage's Heritage at Risk National Strategy (2011-2015) sets out to reduce the overall number of heritage assets that are at risk or vulnerable of becoming so. A target is the removal of a quarter of nationally designated heritage at risk assets from the baseline 2010 Register by April 2015, representing a total of 1,137 buildings.⁵⁶ The Heritage at Risk Register splits assets into: buildings, places of worship, scheduled monuments, registered parks and gardens, registered battlefields, protected wreck sites and conservation areas.⁵⁷

6.7.4 Seeing History in the View presents a method for understanding and assessing heritage significance within views. The report can be used to supplement understanding of views that are already recognised as being important and worth protecting, including those identified in the Mayor's London View Management Framework.⁵⁸ Similarly, Guidance on the Setting of Heritage Assets provides the methodology for defining the extent of the setting of a heritage asset, and for determining how development can impact setting.⁵⁹

London specific context

6.7.5 The London Plan requires boroughs to seek to 'maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration'. It also requires boroughs to seek to increase 'accessibility'.

⁵⁴ HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx (accessed 01/15)

⁵⁵ English Heritage (2011) Understanding place: conservation area designation, appraisal and management [online] available at: <http://www.english-heritage.org.uk/content/publications/publicationsNew/heritage-at-risk/har-2012-lpa/HAR-entries-lpa-2012.pdf> (accessed 01/15)

⁵⁶ English Heritage (2011) Heritage at Risk National Strategy 2011-2015 [online] available at: <http://www.english-heritage.org.uk/publications/eh-har-strategy-2011-15/har-strategy-11-15.pdf> (accessed 01/15)

⁵⁷ English Heritage (2012) Heritage at Risk Register [online] available at: <http://www.english-heritage.org.uk/content/publications/publicationsNew/heritage-at-risk/har-2012-lpa/HAR-entries-lpa-2012.pdf> (accessed 01/15)

⁵⁸ English Heritage (2011) Seeing History in the View [online] available at: <https://www.english-heritage.org.uk/professional/advice/advice-by-topic/setting-and-views/seeing-the-history-in-the-view/> (accessed 01/15)

⁵⁹ English Heritage (2011) Guidance on the Setting of Heritage Assets [online] available at: <http://www.english-heritage.org.uk/publications/setting-heritage-assets/> (accessed 01/15)

Camden specific context

- 6.7.6 Camden has adopted a number of conservation area appraisals and management strategies, which define the special character of the conservation areas and set out an approach to preservation and enhancement. Generally, they include: an appraisal of the special character of the area; lists of buildings which make a positive contribution to the character and appearance of the area; and lists of sites that have a negative impact on the conservation area or where an opportunity may exist for improvement of the area by redevelopment of a building or site.
- 6.7.7 The Council also maintains a Local List, which identifies historic buildings and features that are valued by the local community and that help give Camden its distinctive identity. These features make a place special for local people, they carry history, traditions, stories and memories into the present day and add depth of meaning to a modern place. The List recognises elements of the historic environment that are not already designated in another way (for example a Listed building), but which may nonetheless contribute to a sense of place, local distinctiveness and civic pride. These are known as 'non-designated heritage assets'.

6.8 Housing

National Planning Policy Framework (NPPF)

- 6.8.1 Key messages include:
- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area.
 - Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
 - With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
 - Good design is a key aspect in sustainable development. Development should improve the quality of the area over its lifetime, not just in the short term. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
 - Larger developments are suggested as sometimes being the best means of achieving a supply of new homes.

Supplementing the NPPF

- 6.8.2 The Housing Report identifies the need to produce a step change in housing in order to meet the nations needs and aspirations, especially given that: *'Many of the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify.'* Issues include overcrowding and homelessness.⁶⁰
- 6.8.3 Both Policy Exchange (a leading 'think tank') and the TCPA highlight poor perception of new development as a key barrier to addressing the housing crisis. Policy Exchange state that *'a lot of people object to new development because they assume that the outcome will be buildings that are at best characterless, cheap in everything except price.'* The solutions suggested by the two organisations are quite different:^{61 62}

⁶⁰ The Chartered Institute of Housing, National Housing Federation and Shelter (2012) The Housing Report: Edition 2 [online] available at: http://england.shelter.org.uk/_data/assets/pdf_file/0008/435653/Housing_Report_2_-_May_2012.pdf (accessed 01/15)

⁶¹ Policy Exchange (2013) A right to build: Local homes for local people [online] available at: <http://www.policyexchange.org.uk/images/publications/a%20right%20to%20build.pdf> (accessed 01/15)

⁶² TCPA (2013) Creating garden cities and suburbs today a guide for councils [online] available at: http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today_-_a_guide_for_councils.pdf (accessed 01/15)

- Policy exchange advocates the need for 'self-build' to make a much more significant contribution. Self-build is where development involves a discrete project for a specific owner. Currently, in the UK 10% of new homes (less in England) are self-build. Self-build can be supported by using land auctions to enable the procurement of plots.
- The TCPA believe that a well-planned, holistic approach to new communities provide an opportunity to create high-quality sustainable places, allowing for the highest sustainability standards, economies of scale, and better use of infrastructure. In particular, the TCPA advocate developing Garden Cities and Suburbs according to a series of agreed principles.

6.8.4 The report Housing Conditions of Minority Ethnic Households seeks to quantify the cost of poor housing among minority ethnic households to the NHS and wider society: Around 15% of the 2.2 million ethnic minority households in England are those with at least one Category 1 HHSRS hazard (classified as poor housing). The estimated annual treatment cost to the NHS is around £52m per year if the poor housing amongst the minority ethnic households is left unimproved, and wider costs to society are estimated at 2.5 times the NHS costs.⁶³

6.8.5 The housing market is not delivering enough specialist housing. An adequate supply of suitably located, well-designed, supported housing for older people could result in an increased release onto the market of currently under-occupied family housing, expanding the supply available for younger generations.⁶⁴

Camden specific context

6.8.6 Camden Housing Strategy sets out the following priorities.⁶⁵

- The right people in the right homes – getting the most out of existing homes
- Securing a supply of new housing that meets a range of needs
- Securing specialist support and accommodation for groups with special needs
- Well-maintained, safer, greener homes – improving living conditions and energy efficiency

6.9 Landscape / townscape

European context

6.9.1 The European Landscape Convention (2007) defines landscape as: "An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." It recognises that the quality of all landscapes matters – not just those designated as 'best' or 'most valued'. Among other things, the ELC commits all signatories to establishing and implementing policies aimed at landscape protection, management and integrating landscape into planning, cultural, environmental, agricultural, social and economic policies.

National Planning Policy Framework (NPPF)

6.9.2 Key messages include:

- Set strategic policy to deliver conservation and enhancement of landscape, protecting valued landscapes and giving weight to conservation of scenic beauty.

⁶³ Race Equality Foundation (2014) The Housing Conditions of Minority Ethnic Households in England, Better Housing Briefing 24 [online] available at: <http://www.better-housing.org.uk/briefings> (accessed 01/15)

⁶⁴ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

⁶⁵ LB Camden (2011) Camden Housing Strategy 2011-2016 [online] available at: <http://www.camden.gov.uk/ccm/content/housing/housing-policy-and-strategies/camdens-housing-strategy.en> (accessed 01/15)

Supplementing the NPPF

- 6.9.3 Guidance on Tall Buildings sets out how CABE and English Heritage evaluate proposals for tall buildings. It calls for local authorities to consider appropriate locations for tall buildings in their areas and undertaking urban design studies to identify these.⁶⁶

6.10 Transport

National Planning Policy Framework (NPPF)

6.10.1 Key messages include:

- To minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for 'a balance of land uses'. Wherever practical, key facilities should be located within walking distance of most properties.
- The transport system needs to be balanced in favour of sustainable modes (including walking, cycling and public transport), giving people a choice about how they travel.
- Planning for transport and travel will have an important role in 'contributing to wider sustainability and health objectives'.

Supplementing the NPPF

- 6.10.2 Higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related CO₂ emissions⁶⁷. Plans should ensure that strategic policies support and encourage both walking and cycling.⁶⁸

- 6.10.3 The Department for Transport (DfT) 'Door to Door' strategy considers what is necessary to ensure that people can be confident in choosing sustainable transport. Measures include: Regular and straightforward connections at all stages of the journey and between different modes; Safe, comfortable transport facilities; and Cycling and walking facilities and stations at the heart of the 'plug-in hybrid vehicle programme'.⁶⁹

Camden specific context

- 6.10.4 The Camden Transport Strategy and Local Implementation Plan describes the context and challenges associated with traffic and transport in the borough, and sets out the future direction for transport in Camden. The strategy includes the following objectives:⁷⁰

- Reduce motor traffic and vehicle emissions to improve air quality, mitigate climate change and contribute to making Camden a 'low carbon and low waste borough'
- Encourage healthy and sustainable travel choices by prioritising walking, cycling and public transport in Camden
- Improve road safety and personal security for people travelling in Camden
- Develop and maintain high quality, accessible public streets and spaces and recognise that streets are about more than movement

⁶⁶ English Heritage (2007) Guidance on Tall Buildings [online] available at: <http://www.english-heritage.org.uk/professional/advice/advice-by-topic/setting-and-views/tall-buildings/> (accessed 01/15)

⁶⁷ Lancaster University, University of Leeds and Oxford Brookes University (2011) Understanding Walking and Cycling [online] available at: http://www.its.leeds.ac.uk/fileadmin/user_upload/UWCReportSept2011.pdf (accessed 01/15)

⁶⁸ National Institute for Health and Care Excellence (2012) Walking and cycling: local measures to promote walking and cycling as forms of travel or recreation, Public Health Guidance PH41[online] available at: <http://guidance.nice.org.uk/PH41>

⁶⁹ DfT (2013) Door to Door: A strategy for improving sustainable transport integration [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf (accessed 01/15)

⁷⁰ LB Camden (2011) Camden Transport Strategy [online] available at: <http://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/camdens-local-implementation-plan.en> (accessed 01/15)

- Ensure the transport system supports Camden's sustainable growth and regeneration as well as enhancing economic and community development
- Ensure the transport systems supports access to local services and facilities, reduces inequalities in transport and increases social inclusion
- Ensure that the provision of parking is fair and proportionate by considering the needs of all users, whilst also encouraging sustainable travel choices

6.11 Water, flood risk and other climate change adaptation issues

European context

- 6.11.1 The Water Framework Directive (2000/60/EC) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The EA is currently seeking to establish 'Significant Water Management Issues' within catchments with a view to presenting second River Basin Management Plans to ministers in 2015. The Plans will seek to deliver the objectives of the WFD namely: Enhance and prevent further deterioration of aquatic and wetland ecosystems; Promote the sustainable use of water; Reduce the pollution of water, especially by 'priority hazardous' substances; and Ensure the progressive reduction of groundwater pollution.
- 6.11.2 The WFD has led to the setting up of various protected areas for groundwater such as drinking water protected areas, source protection zones and safeguard zones.
- 6.11.3 The EU's 'Blueprint to Safeguard Europe's Water Resources' promotes the use of green infrastructure, such as wetlands, floodplains and buffer strips along water courses in order to reduce vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.⁷¹

National Planning Policy Framework (NPPF)

- 6.11.4 Key messages include:
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply and wastewater.
 - Take account of the effects of climate change in the long term, including factors such as flood risk, water supply and changes to biodiversity and landscape.
 - Development should be directed away from areas at highest risk from flooding, and should "not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding". Where development is necessary, it should be made safe without increasing risk elsewhere. Where new development is vulnerable this should be managed through adaptation measures.

Supplementing the NPPF

- 6.11.5 The Water White Paper sets out the Government's vision for a more resilient water sector, where water is valued as a precious resource. Measures must address poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.⁷² Measures are put in place to encourage and incentivise water efficiency, with the aspiration to reduce average demand to 130 litres per head, per day by 2030. The White Paper led to a Government consultation on a national strategy on urban pollution in

⁷¹ European Commission (2012) A Blueprint to Safeguard Europe's Water Resources [online] available at http://ec.europa.eu/environment/water/blueprint/pdf/COM-2012-673final_EN_ACT-cov.pdf (accessed 01/15)

⁷² Defra (2011) Water for life (The Water White Paper) [online] available at <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf> (accessed 01/15)

2012. The consultation report notes that pollutants affecting waterbodies include:⁷³ Point Source Pollution - Permitted discharges from factories and wastewater treatment are currently responsible for about 36% of pollution related to failing water bodies; and Diffuse pollution - Unplanned pollution from urban and rural activity.

- 6.11.6 The Flood and Water Management Act sets out the following objectives regarding flood risk:⁷⁴ Incorporate greater resilience measures into the design of new buildings, and retro-fit at risk properties (including historic buildings); Utilise the environment, e.g. land to reduce runoff and wetlands to store water; and Identify areas suitable for inundation and water storage.
- 6.11.7 In relation to Sustainable Drainage Systems (SuDS), further guidance is provided in the document 'Planning for SuDS'. This report calls for greater recognition of the opportunities for multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.⁷⁵
- 6.11.8 The TCPA report Climate change adaptation by design highlights that adaptation to changes in water availability and quality can be addressed at a variety of scales. At the catchment scale greenspace and bluespace strategies should influence development; whilst neighbourhood-level efforts should aim to enhance public spaces. Rainwater harvesting and storage schemes can reduce risk of urban flooding whilst providing additional water supplies.⁷⁶

London specific context

- 6.11.9 The consultation document Working Together – Thames River Basin District considers 'Significant Water Management Issues' that will be priorities for action. The existing River Basin Management Plan for the Thames Basin identifies urban development as an issue that could 'have a wide range of impacts on virtually all aspects' of the water environment. Badly managed growth was seen as potentially cancelling out positive achievements; however, the report also recognised that growth and regeneration can provide significant opportunities to improve the water environment, including through the clean-up of contaminated land.⁷⁷
- 6.11.10 A Strategy for restoring rivers in North London considers how river restoration offers an opportunity to return to a more sustainable approach to managing urban rivers. River restoration can play a positive role in urban regeneration by providing a wide range of social and environmental benefits. Within Camden, the strategy recommends in-channel habitat enhancement along the Regent's Canal.⁷⁸

Camden specific context

- 6.11.11 The London Borough of Camden flood risk management strategy sets out to achieve a number of objectives, including providing action plans for areas at particular risk from surface water flooding, and taking a sustainable and holistic approach to flood management, seeking to deliver wider environmental and social benefits.⁷⁹

⁷³ Defra (2012) Tackling water pollution from the urban environment [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/82602/consult-udwp-doc-20121120.pdf (accessed 01/15)

⁷⁴ Flood and Water Management Act (2010) [online] at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> (accessed 01/15)

⁷⁵ CIRIA (2010) Planning for SuDs [online] available at: <http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebaseandNoTemplate=1&ndContentID=18465> (accessed 01/15)

⁷⁶ TCPA (2007) Climate change adaptation by design: guide for sustainable communities [online] available at: http://www.tcpa.org.uk/data/files/bd_cca.pdf (accessed 01/15)

⁷⁷ Environment Agency (2012) River basin management: working together – Thames River Basin District [online] available at: <https://consult.environment-agency.gov.uk/portal/ho/wfd/working/together2012?pointId=1337591641879> (accessed 01/15)

⁷⁸ EA (2006) Bringing rivers back to life – A Strategy for restoring rivers in North London [online] available at: www.restorerivers.eu/Publications/tabid/2624/mod/11083/articleType/ArticleView/articleId/3238/Bringing-your-rivers-back-to-life.aspx (01/15)

⁷⁹ LB Camden (2013) Managing flood risk in Camden: The London borough of Camden flood risk management strategy [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=3088989 (accessed 01/15)

7 WHAT IS THE SUSTAINABILITY 'BASELINE'?

The Environmental Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan';
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific. Establishing the baseline is about reviewing data-sets established through monitoring for specific 'indicators'. Numerous indicators are considered below, including those suggested by the SEA Practice Guide 2004 and those identified through SA work undertaken by Camden Council as part of developing the Core Strategy and the Euston Area Action Plan.

7.2 Air quality and noise

7.2.1 In 2001 the London borough of Camden designated the whole of the borough as an Air Quality Management Area (AQMA) due to exceedences in NO₂ and particulate matter (PM₁₀). Air pollution is associated with a number of adverse health impacts and has been linked to 5,000 premature deaths in London each year. Research indicates that in 2008, 107 deaths⁸⁰ were attributed to PM_{2.5} in Camden.⁸¹

7.2.2 The Camden Clean Air Action Plan 2013-2015 reveals a long term trend of breaching the annual mean air quality objective for nitrogen dioxide and the daily mean air quality objective for particulate matter. Improving air quality will continue to be challenging, especially at the most heavily trafficked part of the north and south of the borough.⁸²

7.2.3 Camden's Transport Strategy (2011) notes that road transport in Camden makes a significant contribution to deteriorating air quality and pollution levels, with impacts on health and climate change. Road transport, particularly cars and heavy goods vehicles, are the second largest source of nitrogen oxides (NO_x) emissions in the borough (36 per cent). Road transport is also the largest source of particulate matter (PM₁₀) emissions (58 per cent).

7.2.4 Highway congestion is particularly evident along a number of key corridors in Camden including Kentish Town Road, which is a bus corridor as well as having many major junctions within the plan area. Kentish Town Road exceeds the national annual NO₂ objective of 40µg/m³ along with most of Camden's busy roads. Increases in population and employment are likely to further impact on Camden's air quality as the demand for the movement of freight grows.⁸³

⁸⁰ It is important to note that the estimated attributable deaths below do not represent a subset of deaths that are solely caused by PM_{2.5}. Since everyone living in the ward breathes the air, this information should be interpreted as the level of risk distributed across the whole population with a total mortality impact of the concentrations equivalent to that number of deaths.

⁸¹ Greater London Authority (2012) Air Quality Information for Public Health Professionals – London borough of Camden [online] available at: <http://www.london.gov.uk/sites/default/files/Air%20quality%20guidance%20for%20public%20health%20professionals%20-%20LB%20Camden.pdf> (accessed 01/15)

⁸² LB Camden (2013) Air Quality Action Plan 2013-2015 [online] available at: <http://www.camden.gov.uk/ccm/content/environment/air-quality-and-pollution/air-quality/twocolumn/policies-reports-and-research.en?page=3> (accessed 01/15)

⁸³ LB Camden (2011) Camden Transport Strategy and Local Implementation Plan [online] available at: <http://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/camdens-local-implementation-plan.en> (accessed 01/15)

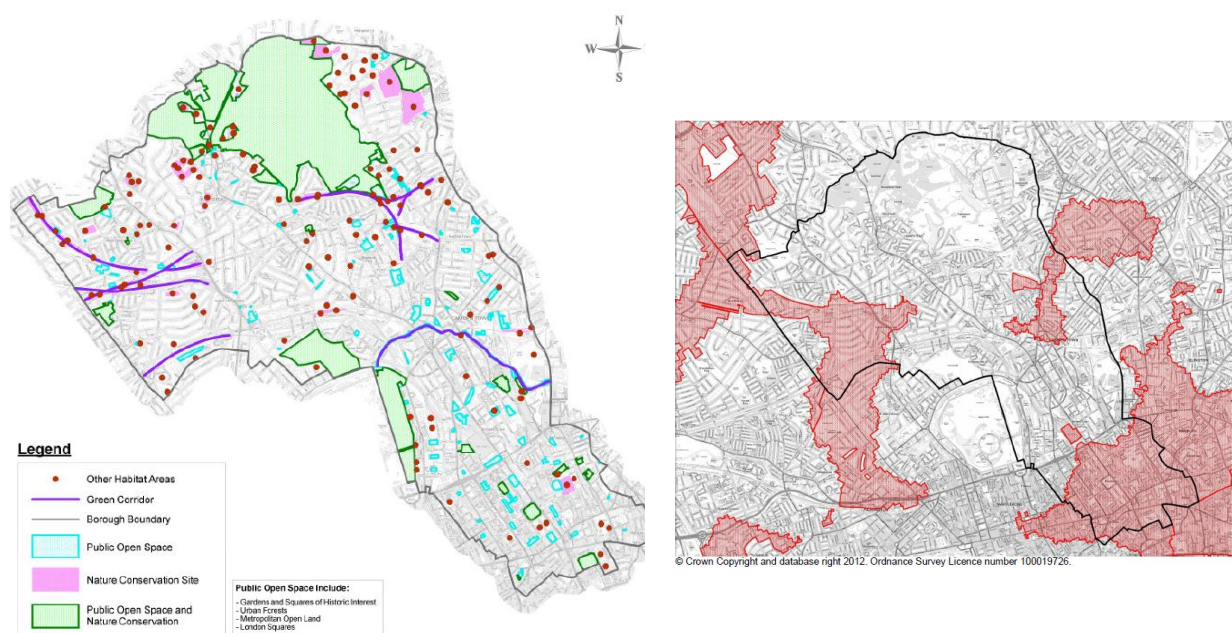
7.3 Biodiversity and green infrastructure

7.3.1 Data from 2012/13 shows a total of 430ha of land classed as being of biodiversity importance within Camden, which is a small increase from the 2010/11 figure of 428.8 ha (Figure 7.1). The Camden Biodiversity Action Plan notes that this area can be broken down as follows:

- Site of Special Scientific Interest (SSSI) – 16.1ha
- Local Nature Reserve – 1.8ha
- Site of Importance for Nature Conservation (SINCs):
 - Metropolitan – 323.8ha
 - borough Grade I – 39.78ha
 - borough Grade II – 31.9ha
 - Local – 18.4ha

7.3.2 The proportion of SINCs considered to be in ‘positive conservation management’ stood at 58% in 2012 (or 21 of the 36 SINCs).⁸⁵

Figure 7.1: Open spaces and conservation sites (left)⁸³ and areas of deficiency⁸⁴ in access to the natural environment in Camden (right)⁸⁵

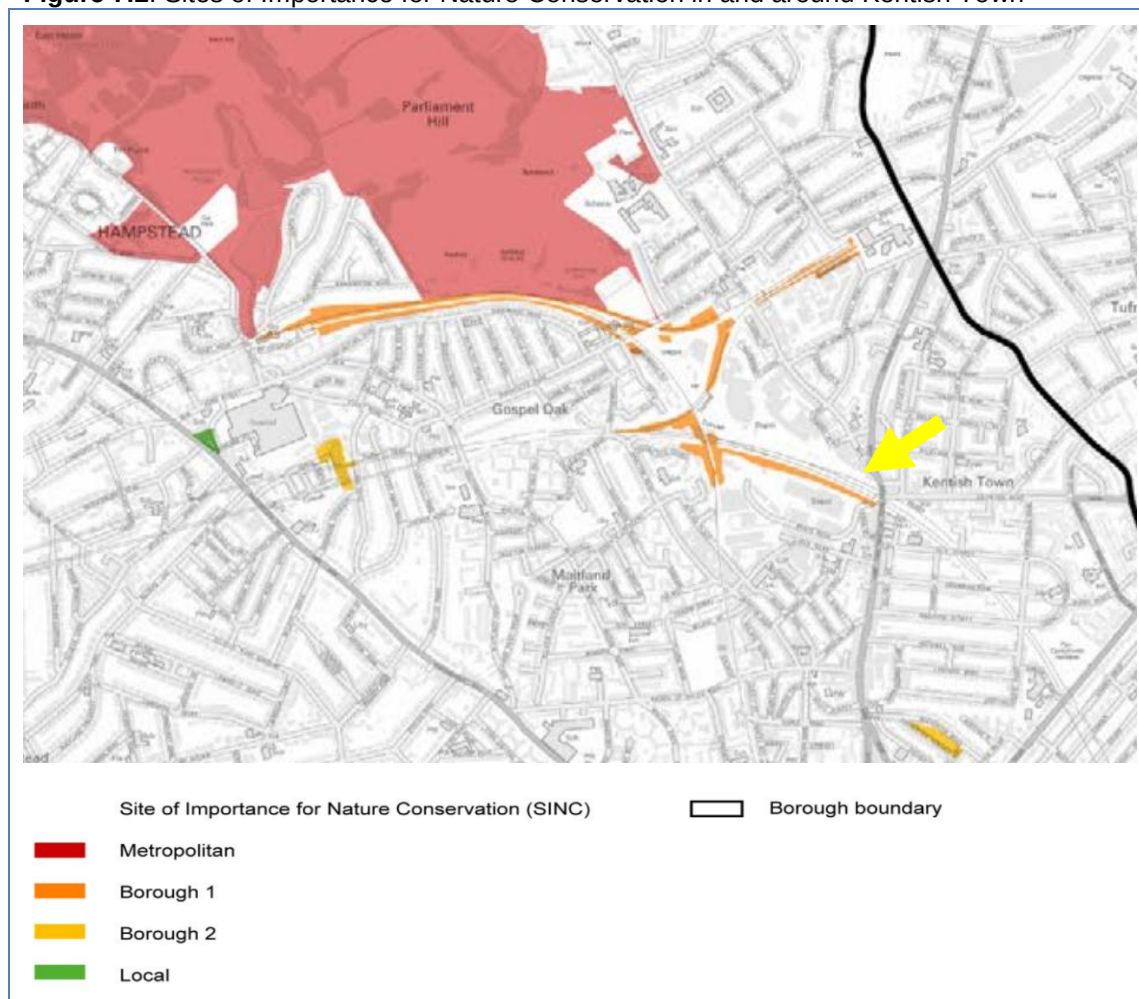


7.3.3 Of particular note, within the left hand map above, is the ‘green corridor’ that runs through the Kentish Town Neighbourhood Plan area and skirts the southern edge of Parliament Hill. This can be seen more clearly in Figure 7.2, which shows the green corridor designated as a ‘Borough 1 Site of Importance for Nature Conservation (SINC)’. It can be seen that the part passing through Kentish Town is associated with the embankment to the railway line that bisects the Kentish Town Industrial Area. Further to the north, the railway / green corridor skirts Parliament Hill, which is designated as the highest level of SINC.

⁸⁴ Red shading shows the areas of deficiency in access to the natural environment – i.e. areas that are more than 1km walking distance from a publicly accessible borough or Metropolitan SINC

⁸⁵ LB Camden (2013) Camden Biodiversity Action Plan 2013-2018 [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset/?asset_id=3132995 (accessed 01/15)

Figure 7.2: Sites of Importance for Nature Conservation in and around Kentish Town



7.3.4 In terms of the regional delivery of green infrastructure, the All London Green Grid is to provide a strategic interlinked network of high quality green spaces and corridors that connect with town centres, public transport nodes, the countryside in the urban fringe, the Thames and major residential areas.⁸⁶ The NDP area falls within the central London area of the Grid.⁸⁷

7.3.5 There is also good potential for green and brown roofs and sustainable urban drainage systems for new and redeveloped buildings, thereby helping to increase biodiversity potential. This is highlighted by Camden Development Policy DP22.

Open space

7.3.6 Camden is around 2,171 ha in size, of which around 529 ha is open space. Of this area an estimated 400 ha is publicly accessible. This means that the borough is considered deficient in terms of accessible open space. Although residential areas appear to be very leafy with large mature trees and some reasonably sized private gardens, there is a lack of small to medium sized, publicly accessible green and open spaces in the Area (Figure 7.1).

⁸⁶ GLA (2013) Green infrastructure and open environments: the All London Green Grid SPD [online] available at: http://www.london.gov.uk/sites/default/files/ALGG_SPD_Mar2012.pdf (accessed 01/15)

⁸⁷ GLA (2013) All London Green Grid: central London Area Framework [online] available at: <http://www.london.gov.uk/sites/default/files/AF12%20Central%20London.pdf> (accessed 01/15)

7.4 Climate change mitigation

- 7.4.1 Emissions of CO₂ per capita in the borough have been falling in recent years. Total emissions per capita have fallen from 7.9 tonnes in 2005 to 6.7 tonnes by 2010 (Table 7.1). This decline can be broken down as follows: transport emissions have fallen by 0.1 tonnes, domestic emission by 0.3 tonnes and industrial emissions by 0.7 tonnes. Total emissions per capita are higher than the 2011 Greater London figure (5.1 tonnes), and are also above the national (4.6 tonnes) average. In particular, industrial and commercial emissions are above the Greater London and national averages.⁸⁸

Table 7.1: CO₂ emissions within the scope of influence of local authorities – Annual per capita emissions in tonnes (2005 and 2011)⁸⁹

Area	Year	Industry and Commercial	Domestic	Road Transport	Total
Camden	2005	5.1	2.0	0.8	7.9
	2011	4.4	1.7	0.7	6.7
Greater London	2005	2.7	2.3	1.1	6.1
	2011	2.1	1.8	0.9	4.8
England	2005	2.9	2.5	1.7	7.1
	2011	2.2	2.0	1.4	4.6

- 7.4.2 Camden Council are targeting a 40% borough wide CO₂ reduction by 2020, with CHP led energy networks considered likely to be a key contributor to the targeted reduction. A CHP led network has been developed in the Gospel Oak area. This scheme redirects surplus heat from the Royal Free Hospital's CHP to 1,500 homes. The Council are also looking at developing a CHP led network in Somers Town, providing low carbon heat to four estates, whilst further opportunities are being explored in the Bloomsbury area.⁹⁰
- 7.4.3 In terms of renewable energy generation in major schemes permitted in the borough, rates have been variable, with two of 29 developments generating more than 20% of their power from renewable sources in 2010/11, 10 of 19 developments in 2011/12, and four of 23 developments in 2012/13.⁹¹

Waste management

- 7.4.4 Camden has seen a trend of reducing volumes of waste and increasing recycling rates over the past 10 years, despite population growth. The total amount of municipal waste arisings for Camden in 2011/12 was 117,582 tonnes and the amount recycled was 25,124 tonnes. In 2011/12 32.97% of household waste was recycled. This compares to a household recycling rate of 27.14% in 2005/06. The borough is targeting a recycling and composting rate of 50% by 2020.⁹²

⁸⁸ DECC (2010) Local Authority Carbon Dioxide Figures[online] available at:

http://www.decc.gov.uk/en/content/cms/statistics/climate_stats/gg_emissions/laco2/laco2.aspx (accessed 01/15)

⁸⁹ Ricardo-AEA (2013) Local and Regional CO₂ Emissions Estimates for 2005-2011 [online] available at:

<https://www.gov.uk/government/publications/local-authority-emissions-estimates> (accessed 01/15)

⁹⁰ LB Camden (2013) Combined heat and power (CHP) led energy networks [online] available at:

<http://www.camden.gov.uk/ccm/content/housing/housing-and-the-environment/combined-heat-and-power.en> (accessed 01/15)

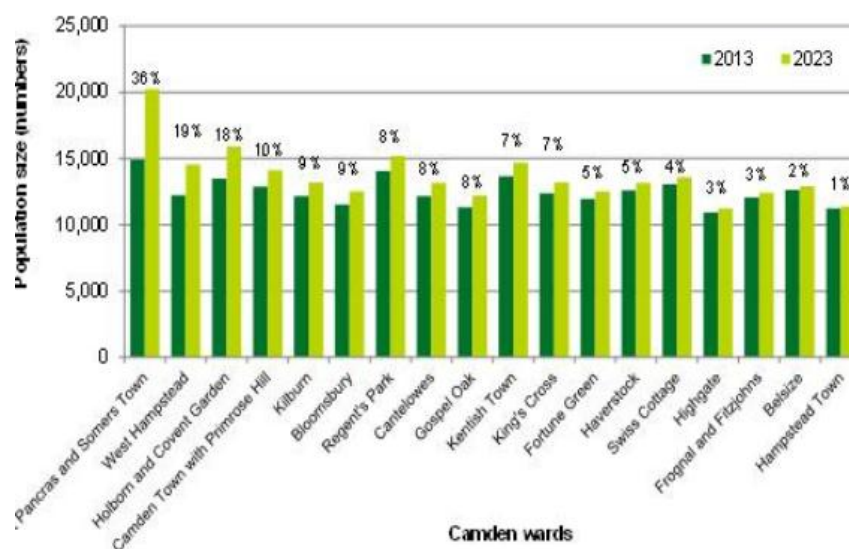
⁹¹ LB Camden (2013) Authority Monitoring Report [online] available at: <https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/core-strategy/evidence-and-supporting-documents.en> (accessed 01/15)

⁹² LB Camden (2012) Regeneration and Planning: Annual Monitoring Report [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2970322 (accessed 01/15)

7.5 Community and well-being (including health)

- 7.5.1 In 2013, Camden had an estimated population of 225,140 people.⁹³ In 2011 there were a total of 17,140 residents in the plan area⁹⁴, compared to 14,650 in 2001.⁹⁵ Camden's population is expected to rise to 246,100 by 2023, representing an increase of 8.5%. This compares with a 9.9% increase in London. Expected population growth will not be evenly spread through the borough (Figure 7.3). Sizeable increases are expected in the wards of Kentish Town and Cantelowes (part of which is in the plan area), with an increase of 7% and 8% respectively in total population expected by 2023.⁹⁶
- 7.5.2 The age and sex profile of Camden is very similar to that of London. However, the population is younger than that of England, with a significantly greater proportions of younger adults aged between 25 and 40 years. A high proportion of Camden's population is of working age, with 73% aged between 16 and 64.⁹⁶
- 7.5.3 People aged over 45 are expected to account for the largest rise between now and 2023, with the highest percentage increase being in those 75 and over (increasing 30% to 3,500 people). This is expected to impact on demand for services targeted at older people. In the plan area there was a general proportional decrease in age groups 1-17 from 2001 to 2011, with a significant increase occurring in the 20-29 age group, while all older age groups show a consistent increase from 2001 to 2011.⁹⁷
- 7.5.4 Consultation with older residents of the borough found that community, leisure and resource centres were seen as particularly important in helping people feel less lonely as they grow older. Access to sports and physical activity was also considered important.⁹⁸

Figure 7.3: Projected percentage change in population from 2013 to 2023 in Camden by ward, all ages.⁹⁶



⁹³ LB Camden (2013) Joint strategic needs assessment - Chapter 1: Camden's population [online] available at: <http://www.camden.gov.uk/ccm/content/social-care-and-health/health-in-camden/joint-strategic-needs-assessment-2012/chapter-1-demographic-chapter.en?page=2> (accessed 01/15)

⁹⁴ ONS (2011) Census 2011, Population Density, 2011 (QS102EW) Super Output Area Lower Layer (accessed 01/15)

⁹⁵ ONS (2011) Census 2001, Population Density, 2001 (UV02) Super Output Area Lower Layer (accessed 01/15)

⁹⁶ LB Camden (2013) Joint strategic needs assessment - Chapter 1: Camden's population [online] available at: <http://www.camden.gov.uk/ccm/content/social-care-and-health/health-in-camden/joint-strategic-needs-assessment-2012/chapter-1-demographic-chapter.en?page=2> (accessed 01/15)

⁹⁷ ONS (2001; 2011) Census 2001 and 2011, Age Structure 2011 (KS102EW), Age Structure 2001 (KS02).

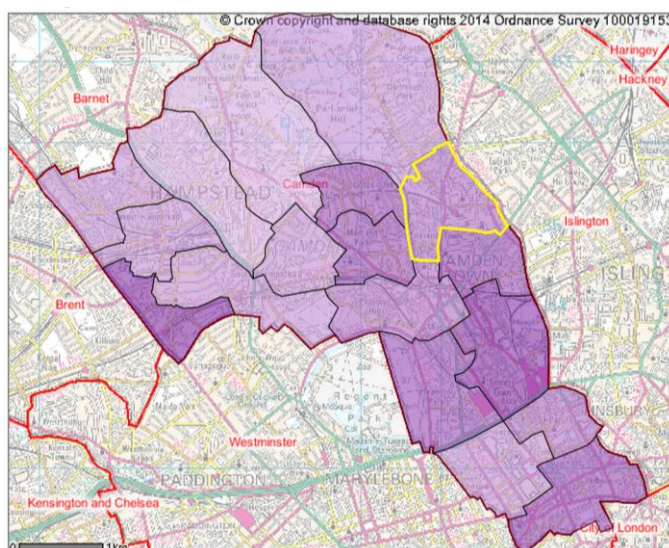
⁹⁸ LB Camden and Camden NHS Primary Care Trust (2008) A borough of opportunity for people in their 50s and beyond 2008–13 [online] available at: <http://www.camden.gov.uk/ccm/navigation/council-and-democracy/camden-plan/strategies-and-partnerships/quality-of-life-strategy-for-older-citizens/> (accessed 01/15)

- 7.5.5 Camden's population is highly culturally and ethnically diverse. It is estimated that around 35% of Camden's overall population are from a black minority ethnic group (BME) background. In addition, 22% of Camden's residents are from the non-British, white community. Data from the 2011 census suggests that concentration of specific ethnic groups vary across Camden's wards.⁹⁹

Deprivation

- 7.5.6 Camden ranks as the 74th most deprived nationally in terms of the Index of Multiple Deprivation (IMD), out of 353 nationally. Within London, Camden ranks 15th out of 32 boroughs. Camden performs slightly better in terms of the IMD 'concentration of deprivation' measure (143rd nationally and 19th in London), implying that there are less extremes of affluence and deprivation than is the case for many other London boroughs.⁹⁹ 37% of children in Camden live in poverty, the joint 7th highest level in the country.¹⁰⁰ Deprivation levels are linked to numerous health problems (chronic illness, lower life expectancy) and unhealthy lifestyles (obesity, smoking, drugs misuse), increasing the need for health resources in those areas. Additionally, those in more deprived areas are less likely to engage with health services.
- 7.5.7 Levels of deprivation in Kentish Town ward are largely in line with borough values, with 35.7% of households being deprived in one dimension, 7.46% deprived in three dimensions, and 1.6% deprived in four dimensions (Figure 7.4). Levels of deprivation differ in the neighbouring ward of Canteloves (part of which is within the plan area), with a lower 34.2% of households deprived in one dimension, whilst a significantly higher percentage of households are deprived in multiple dimensions when compared to Kentish Town ward. These values are higher than London and national averages.¹⁰¹

Figure 7.4: Multiple deprivation for households deprived in four dimensions across Camden, with Kentish Town ward (1.5% of households) highlighted (where darker colours denote higher deprivation values). Canteloves ward (below Kentish Town) has a higher proportion of households deprived in four dimensions (2.2% of households).¹⁰¹



⁹⁹ See <http://neighbourhood.statistics.gov.uk/>

¹⁰⁰ LB Camden (2012) Change for children and families 2012 [online] available at: <http://www.camden.gov.uk/ccm/navigation/community-and-living/your-local-community/children-and-young-people-s-partnership/plan/> (accessed 01/15)

¹⁰¹ ONS (2011) Census 2011, Households by Deprivation Dimensions, 2011 (QS119EW)

- 7.5.8 24% of Camden's Lower Super Output areas (LSOAs) are in the 20% most deprived nationally.⁹⁶ Kentish Town ward and Cantelowes ward have one small area and three small areas respectively which fall into the 20% most deprived nationally.^{102 103}

Health

- 7.5.9 The overall life expectancy for men and women in Camden has improved over the past 10 years at a faster rate than London and England. During 2009-11 life expectancy at birth for Men in Camden stood at 79.9 years for men and 85 years for women.¹⁰⁴
- 7.5.10 Despite the improvements in life expectancy in the borough, the gains have not been spread evenly through the population. During the period 2006-10 there was an 11.6 years gap in life expectancy between male residents living in the '10% least deprived' and '10% most deprived' areas in Camden, and a 6.2 year gap for females.
- 7.5.11 The prevalence of childhood obesity is significantly higher in Camden than in England, and has remained so over the past five years.¹⁰⁵ Around one in 10 4-5 year olds and around one in five 10-11 year olds is obese.¹⁰⁶ Children from the most deprived areas are more likely to be obese.¹⁰⁷ It is estimated that 15.5% of Camden adults are obese.
- 7.5.12 Camden has the second highest prevalence of recorded serious mental illness in both London and England and the 5th highest rate of depression in London.
- 7.5.13 In 2011, 7.7% of the plan area's residents felt that they were limited a lot in their daily lives as a result of their health, which is in line with the Camden average of 8% but above the London average of 6.8%.¹⁰⁸ 4.5% of residents in the plan area have bad health, with a further 1.5% stating they have very bad health.¹⁰⁹
- 7.5.14 Cantelowes ward and parts of Kentish Town ward are estimated to have a higher prevalence of smoking and binge drinking compared to Camden as a whole (Figure 7.5).

¹⁰² LB Camden (2011) Camden Ward Profile – Health – Kentish Town [online] available at:

<http://www.camdendata.info/AddDocuments1/Kentish%20Town%20ward%20general%20health%20profile.pdf> (accessed 01/15)

¹⁰³ LB Camden (2011) Camden Ward Profile – Health – Cantelowes [online] available at:

<http://www.camdendata.info/AddDocuments1/Cantelowes%20ward%20general%20health%20profile.pdf> (accessed 01/15)

¹⁰⁴ LB Camden (2013) Joint strategic needs assessment – Chapter 2: overall health and well-being in Camden [online] available at:

<http://www.camden.gov.uk/ccm/content/social-care-and-health/health-in-camden/joint-strategic-needs-assessment-2012/chapter-two-camdens-population.en?page=3> (accessed 01/15)

¹⁰⁵ LB Camden (2012) Camden children and young people's profile [online] available at:

<http://www.camden.gov.uk/ccm/navigation/community-and-living/your-local-community/children-and-young-people-s-partnership/plan/> (accessed 01/15)

¹⁰⁶ LB Camden (2013) Camden Biodiversity Action Plan 2013-2018 [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset/?asset_id=3132995 (accessed 03/14)

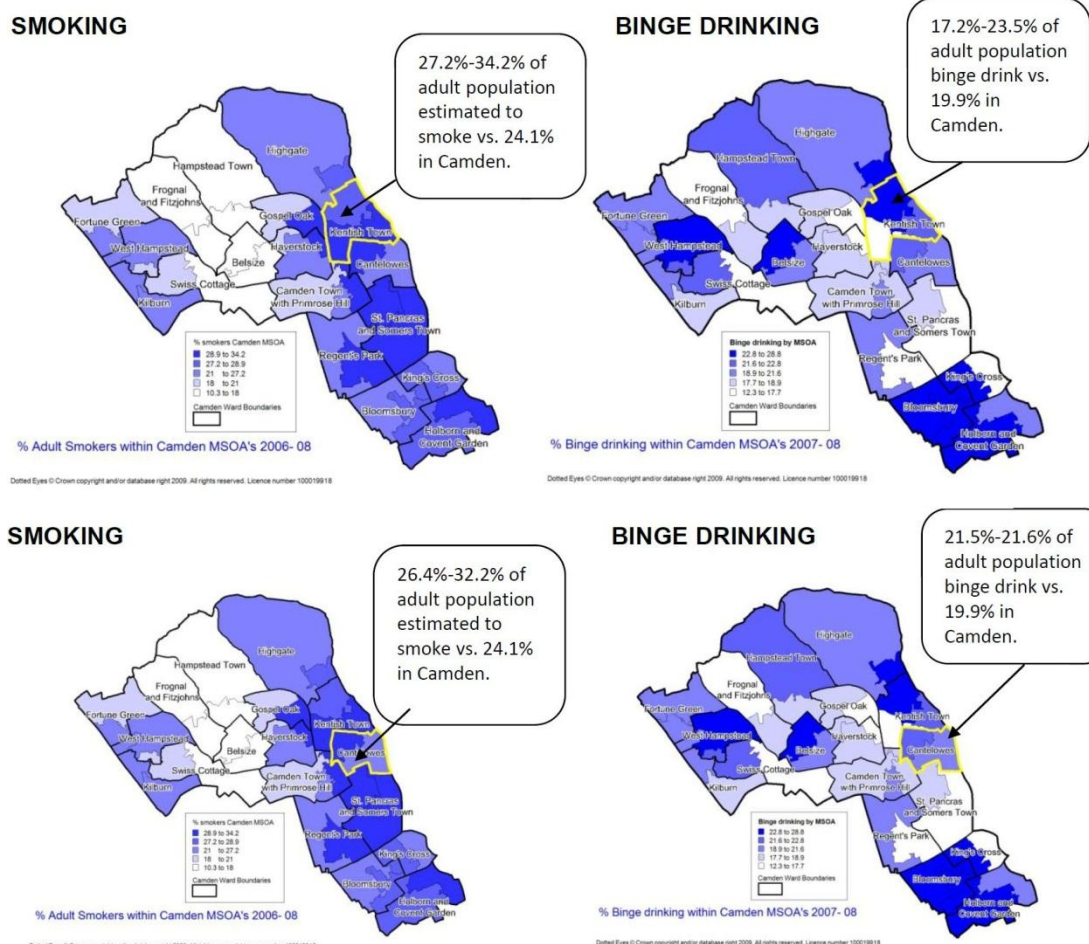
¹⁰⁷ LB Camden (2012) Change for children and families 2012 [online] available at:

<http://www.camden.gov.uk/ccm/navigation/community-and-living/your-local-community/children-and-young-people-s-partnership/plan/> (accessed 03/14)

¹⁰⁸ ONS (2011) Census 2011, Long-Term Health Problem or Disability, 2011 (QS303EW)

¹⁰⁹ ONS (2011) Census 2011, General Health, 2011 (QS302EW)

Figure 7.5: Lifestyle behaviours across the borough reflect high levels of smoking and alcohol intake (where darker colours denote increased values), with Cantelowes ward and Kentish Town ward highlighted below respectively.^{102 103}



7.5.15 Within the NHS Camden's Commissioning Strategy Plan for 2009-14, Kentish Town is identified as one of the four priority wards in Camden targeted with additional health services for residents.¹¹⁰ The recently completed Kentish Town Health Centre accommodates a range of services for the area.

Crime

7.5.16 Of all local authority areas in London, Camden has the second highest crime rate. In February 2012 Camden had 12.5 per 1,000 residents, whilst the average rate for London was 8.5 per 1,000 residents. However, the borough has also seen the greatest reduction in overall crime compared to all London boroughs between 2001/2 and 2011/12. Between 2001/2 and 2011/12 the total number of crimes dropped by 32% (from 53,031 to 35,825)

¹¹⁰ LB Camden (2011) Shaping the future of the Kentish Town area – Engagement on Key Issues May 2011.

- 7.5.17 Crime consistently appears as a priority issue for residents and businesses.¹¹¹ Consultation with older people in the borough found that street lighting invisibility of police and community safety officers and concerns about the behaviour of young people were reasons for fear of crime. In addition, dangerous pavements, road crossings and other public highways issues affected people's sense of safety and security.¹¹²

Education

- 7.5.18 Camden has shown a year on year improvement in all indicators for Key Stage 4, with 59% of pupils aged 16 achieving 5+ GCSEs at grades A*-C (including English and maths), up from 53% in 2010. For those that do not achieve 5+ A*-G at GCSE, the risks of not-participating in education, employment or training (NEET) afterwards long term increases substantially. In 2012, 93% of pupils not achieved 5+ A*-G at GCSE stood at 7%, down from 8% in 2010.¹¹³ Between November 2011 and January 2012, 7% of 16-18 year olds resident in Camden were NEET. This compares to a central London rate of 5.1% over the same period.

Facilities

- 7.5.19 During the 2009/10 financial year there was a net gain of 25,953m² of community facilities, with a further 136,000m² of community facilities either under construction or awaiting development. However, in terms of sports pitch facilities Camden is significantly below national levels.¹¹⁴
- 7.5.20 Camden Council has a £403m capital funding gap which it intends to address through its Community Investment Programme (CIP). This scheme hopes to raise £300m by redeveloping or selling buildings or land that are underused or expensive to maintain. This scheme intends to reinvest some of the collected funding into:¹¹⁵
- Providing at least 9,000m² of improved community facilities and space
 - Reinvesting £117m into 58 schools and children's centres up to 2016, with 543 additional school places to potentially be generated
- 7.5.21 There is a lack of community facilities in the Kentish Town part of the borough with pressure expected to increase with population growth. There is currently a lack of holiday and evening activities, play spaces for children, and a shortage of community facilities within the highly built-up plan area. In particular, the centre and south of Kentish Town is identified as a localised area of deficiency for the provision of child play space and multi-use game areas.¹¹⁶
- 7.5.22 In 2011 there was one local authority care home (without nursing) in the Kentish Town ward, with no local authority care home facilities in the ward of Cantelowes. There are five private care homes in the ward of Kentish Town, four without nursing and one with nursing. There is one private care home (without nursing) and a private hospital in Cantelowes ward. There are two hostels or temporary shelters for the homeless in Kentish Town ward, compared to one in Cantelowes ward.¹¹⁷

¹¹¹ LB Camden (2012) Camden Site Allocations LDF - Sustainability Report of the Submission document [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=3123021 (accessed 01/15)

¹¹² LB Camden and Camden NHS Primary Care Trust (2008) A borough of opportunity for people in their 50s and beyond 2008–13 [online] available at: <http://www.camden.gov.uk/ccm/navigation/council-and-democracy/camden-plan/strategies-and-partnerships/quality-of-life-strategy-for-older-citizens/> (accessed 01/15)

¹¹³ LB Camden (2013) Joint strategic needs assessment – Chapter 4: education [online] available at: <http://www.camden.gov.uk/ccm/content/social-care-and-health/health-in-camden/joint-strategic-needs-assessment-2012/chapter-4--education.en?page=2> (accessed 01/15)

¹¹⁴ LB Camden (2012) Euston AAP SA Scoping

¹¹⁵ LB Camden (2014) Community investment programme [online] available at: <http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/placeshaping/twocolumn/the-community-investment-programme.en> (accessed 01/15)

¹¹⁶ LB Camden (2009) Camden Infrastructure and CIL Study: Social Infrastructure Needs Assessment.

¹¹⁷ ONS (2011) Census 2011, Communal Establishment Management and Type - Communal Establishment, 2011 (QS420EW)

7.6 Economy and employment

- 7.6.1 In 2007, Camden had over 24,000 businesses, ranging from international organisations to small businesses. Over half of the businesses in 2007 in Camden were in 'knowledge economy' industries such as the media, finance, law and other professional services, with leisure entertainment and tourism also important.¹¹⁸ Camden has established itself as a leading location for the creative industries in London, with over 10% of London's jobs in the creative industries located in Camden. Kentish Town has been successful in attracting SMEs and micro-businesses to converted industrial buildings.¹¹⁹
- 7.6.2 A 2009-2010 Retail 'Health Check' Study of the borough suggested that its retail centres continue to be of vital importance to its local people and wider London. Camden Town performs the role of a Major Centre in borough; with their being little physical capacity to accommodate significant additional retail floorspace in any of Camden's other centres.¹²⁰
- 7.6.3 Key findings from 2013 health checks identify that Kentish Town is considered to be performing well in relation to the provision of convenience and service units; however, there is limited comparison goods retail floorspace in the centre. The town benefits from the four foodstores in the centre, and although these are of relatively limited scale, appear to be performing strongly.¹²¹
- 7.6.4 Monitoring data for Camden however suggests land use pressures and conflicts between uses. This is particularly the case with demand for housing development over other land uses, and the potential threat that this demand creates for employment generating land uses.¹²²
- 7.6.5 From April 2004 to the end of October 2013 (i.e. before the change to the permitted development right), over 600,000 ft² of office space was lost within Camden borough, though this was in a managed manner. Any further loss, especially where it is not accompanied by any strategic gains, could seriously undermine the long term attractiveness of the area as a location for business. Since the change to development rights, a further 257,000 ft² of B1aa office space has been lost in less than 12 months. Using an industry standard multiplier of one person to every 100 ft² this equates to some 2,570 jobs.¹²³
- 7.6.6 Between 2006 and 2013 a decline in employment floorspace (i.e. B1 offices, B2 general industrial and B8 warehousing) has been observed (Figure 7.6). The majority of future employment floorspace is expected to be completed in the King's Cross Growth Area. Reflecting national trends, there has been a longer term and gradual trend toward fewer A1 shops and more food, drink and entertainment uses across the borough.¹²⁴

¹¹⁸ LB Camden (2012) Camden Site Allocations LDF - Sustainability Report of the Submission document [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=3123021 (accessed 01/15)

¹¹⁹ LB Camden (2014) Employment Land Study 2014.

¹²⁰ Health Check Retail Profile 2009-2010 – Kentish Town Centre Retail Profile.

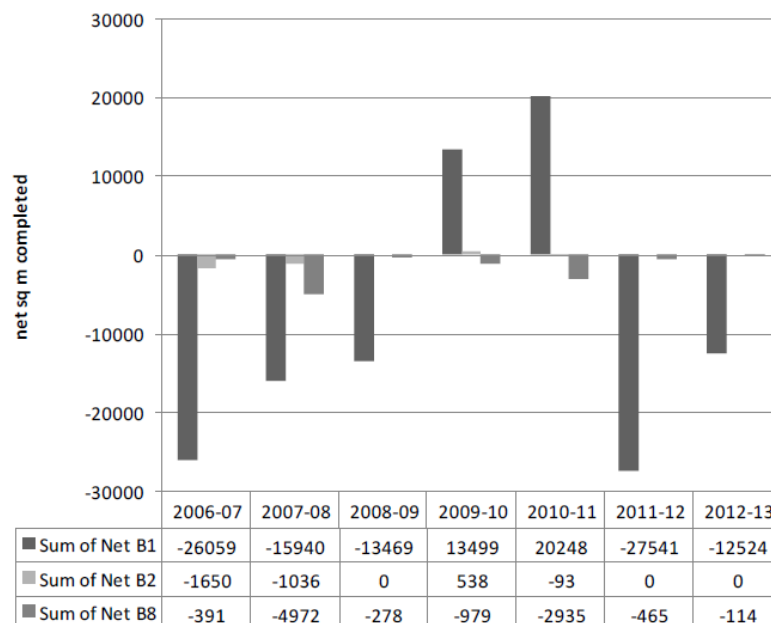
¹²¹ LB Camden (2013) Camden Retail and Town Centre Study [online] available at: <http://www.eustonareaplan.info/wp-content/uploads/2014/04/CED5-Camden-Retail-and-Town-Centre-Study-November-2013-FINAL.pdf> (accessed 01/15)

¹²² LB Camden (2012) Euston AAP SA Scoping Report [online] available at: <http://www.eustonareaplan.info/wp-content/uploads/2012/09/Euston-Area-Plan-SA-Scoping-report-merged-19-09-2012.pdf> (accessed 01/15)

¹²³ LB Camden (2014) Office to Residential Permitted Development Rights Impact Study [online] available at: http://www.camdentownunlimited.com/sites/default/files/office_to_residential_impact_final_report.pdf

¹²⁴ LB Camden (2013) Authority Monitoring Report [online] available at: http://www.eustonareaplan.info/wp-content/uploads/2014/04/CDP7-Authority-Monitoring_Report-Camden-2012-13.pdf (accessed 01/15)

Figure 7.6 Change in employment floorspace in Camden over seven years.



- 7.6.7 Specific data with regard to the total loss of B1 floorspace to residential permitted development rights has not been provided but Camden Council estimates approximately 40,000 m² of B1 floorspace would be lost if schemes are implemented. The largest conversion rates have been seen in Kentish Town and Camden Town where approximately an additional 206 residential units and loss of approximately 17,000m² of B1(a) office floorspace have been approved.
- 7.6.8 The Kentish Town area has a much lower concentration of office activity in the outer LB Camden office market. That which exists is generally older and spread more thinly. Most offices contain businesses that cater for local needs. The most imposing building is Linton House on Highgate Road, a converted light industrial structure that now provides serviced office accommodation. However, this building has now obtained London borough of Camden prior approval for conversion into residential.
- 7.6.9 The plan area is clearly growing as a residential area, with much building activity and evidence of a growing retail offer, including bars and restaurants. It should be noted that the London Office Policy Review 2012 supports the promotion of Camden Town and Kentish Town as residential/non-office led mixed use areas.
- 7.6.10 Kentish Town Centre consists of primary and secondary retail and commercial frontages on the following streets in Kentish Town ward, Canteloves ward, and Camden Town and Primrose Hill ward: Kentish Town Road, Fortress Road, Highgate Road, and Wolsey Mews. Kentish Town Centre has experienced a steady increase in the number of vacant units since October 2009. The numbers have increased from 18 units in October 2009 to 24 in October 2010 and at 9.27% of all ground floor units. This proportion is above the borough average.
- 7.6.11 In 2012/13 for the first time since 2007 (the beginning of the comparable data) LB Camden recorded a decrease in the vacancy rate in the designated shopping frontages in Camden's centres. Vacancy rates gradually rose from 5% in 2007 up to 7% in 2012, and then down to 6% in 2013. Camden has lower average vacancy rates than the London (10%) and national averages (14%).

- 7.6.12 Camden has experienced a loss of retail uses in its centres, although at much lower rates than the national and London wide levels. Vacancy rates in Kentish Town are below the national and regional average for Greater London. Over 2012 to 2013 Kentish Town Centre recorded a net increase in A1 shops (three shops).¹²⁵
- 7.6.13 The below average provision of comparison units in Kentish Town is accentuated by the low quality of existing retailers. The comparison offer is dominated by discounted goods units, such as charity shops, home wares and fashion. Camden's LDF has identified Kentish Town Centre as a 'highly accessible area' considered to be suitable location for the provision of homes, shops, food, drink and entertainment uses, and offices.
- 7.6.14 While Kentish town is well placed to benefit from development, smaller commercial floorplates within the town centre is seen as a deterrent to attract key retailers. It will become increasingly important to create a differentiated offer, tailored to the local catchment to encourage local residents to shop and spend time socialising locally. Other economic weaknesses include the varying environmental quality of the centre, which would benefit from shopfront improvements to improve the street scene, particularly along the secondary frontages which are blighted by lower quality retail units.
- 7.6.15 In October 2010, work by the Borough Council identified 41 'significant retailers' were located in Kentish Town Centre. The three largest business categories in the centre were Restaurants (29 units), Supermarkets (13 units) and Hairdressers/Barbers (12 units). These categories represented 21% of the businesses in Kentish Town. Although there has been no recent update to the Health Check Retail Profile of Kentish Town, it is noted that there has been a significant rise in estate agents in the plan area.
- 7.6.16 There are few concentrations of industrial and warehousing uses left within Camden. The area between Kentish Town and Gospel Oak is the only area of land in the borough to have a mix of such uses and no housing, making it particularly suited for continued employment use.

Employment

- 7.6.17 The mean annual household income in Camden is £39,040. This figure is higher than the Greater London average of £37,661 and well above the Great Britain average of £32,353. Employment in the borough is concentrated in the central London area of Camden, with 60% located south of Euston Rd and a further 15% in Somers town and Regents Park areas including Camden Town (as far north as the tube station).
- 7.6.18 Unemployment in Camden as measured by JSA claimant count has been falling at a gradual rate, but is still higher than in 2008. In June 2013, the level of unemployment was lower than the London and UK average at 4.4%, with the number of residents claiming JSA having fallen 24.2% from its high point in November 2009. However, the overall claimant count is still higher than in April 2008, when it stood at a 20 year low of 3.8%. In addition, 1,480 residents are in long term unemployment (over 12 months), 129% higher than in April 2006.¹²⁶
- 7.6.19 73% of Kentish Town ward residents are economically active, which is significantly higher than Camden (68%), London (72%) and national (70%) averages, subsequently the ward has lower levels of unemployment and residents whom are economically inactive due to retirement, education, caring for family or long term illness.¹²⁷ 68% of Cantelowes ward residents are economically active, which is line with Camden averages but below regional and national values, subsequently the ward has a higher level of economically inactive residents compared to Kentish Town, London and national values.

¹²⁵ LB Camden (2012) Monitoring Bulletin 2 2012/13, Town centres and retail, Basements, Housing quality.

¹²⁶ LB Camden (2013) Joint strategic needs assessment – Chapter 3: employment [online] available at: <http://www.camden.gov.uk/ccm/content/social-care-and-health/health-in-camden/joint-strategic-needs-assessment-2012/chapter-3-employment.en?page=3> (accessed 01/15)

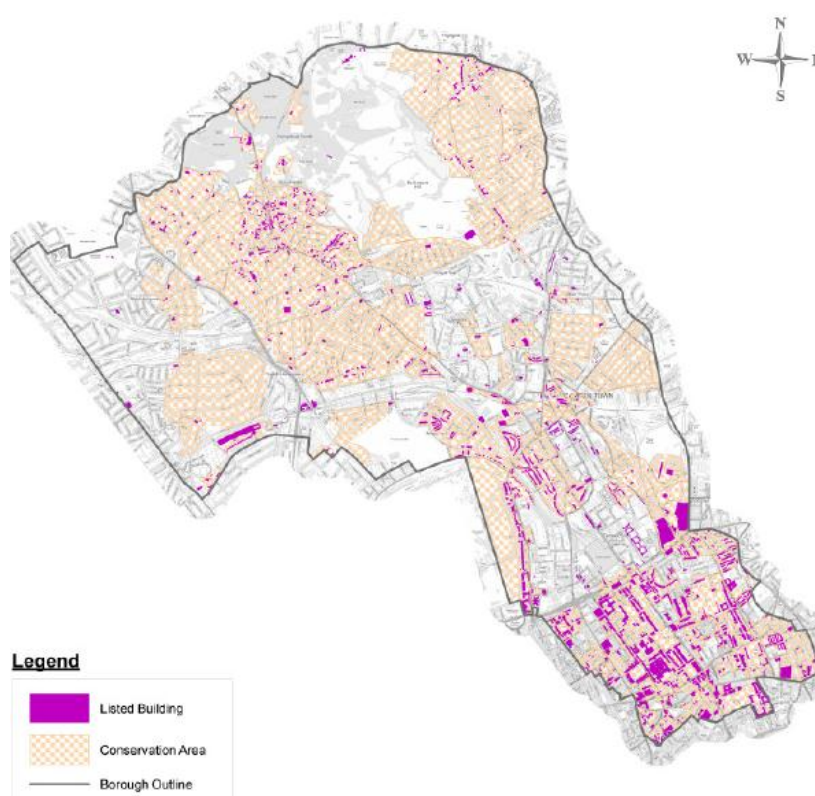
¹²⁷ ONS (2011) Census 2011, Economic Activity, 2011 (QS601EW)

- 7.6.20 Significant levels of employment for residents in the plan area exist in the following industries: Wholesale and Retail Trade (10%); Information and Communication (13%); Professional, Scientific and Technical Activities (18%); Education (11%); Human Health and Social Work Activities (9%); and Arts, Entertainment and Recreation (10%).¹²⁸

7.7 Heritage

- 7.7.1 There are 39 conservation areas, 5645 listed buildings and 13 Archaeological Priority Zones in Camden.¹²⁹ Large parts of the Camden area are covered by conservation areas and there are numerous listed buildings throughout the neighbourhood area (Figure 7.7).
- 7.7.2 There are four conservation areas within the plan area, namely the Bartholomew Estate, Inkerman Conservation Area, Kelly Street Conservation Area, and the Kentish Town Conservation Area. A small section of the Dartmouth Park Conservation Area bisects the northern edge of the plan area, while the southern boundary of the plan area is shared with Jeffrey's Street Conservation Area and Rochester Conservation Area.

Figure 7.7: Conservation areas and listed buildings in Camden¹³⁰



- 7.7.3 The Bartholomew Estate Conservation Area is a compact and well preserved Victorian residential development, which has changed little over the last 150 years, retaining much of its Victorian integrity. Development pressure and alterations have been of a limited nature due to consistent historic freehold ownership of large parts of the conservation area, now largely owned by Camden Council.¹³¹

¹²⁸ ONS (2011) Census 2011, Industry, 2011 (QS605EW)

¹²⁹ LB Camden (2012) Camden Site Allocations LDF - Sustainability Report of the Submission document [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=3123021 (accessed 01/15)

¹³⁰ LB Camden (2011) Camden Transport Strategy and Local Implementation Plan [online] available at: <http://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/camdens-local-implementation-plan.en> (accessed 01/15)

¹³¹ LB Camden (2001) Bartholomew Estate Conservation Area Statement

- 7.7.4 The Inkerman Road Conservation Area forms a dense and homogenous environment in the heart of Kentish Town. The prevailing character is residential, with incidental corner shops on ground floor level integrated with institutional, educational, light industrial and commercial uses. The majority of the buildings were built in the 1850s and 1860s and they form its core. Although the area has a cohesive overall identity each street within it displays different characteristics. A small area on the south side of Anglers Lane within the conservation area has been identified by English Heritage Greater London Archaeological Advisory Service as an Archaeological Priority Area. A designated Strategic View cuts across the conservation area (Strategic View 3) of Parliament Hill to St. Paul's.¹³²
- 7.7.5 The Kelly Street Conservation Area comprises two adjoining streets of flat-fronted terraces, typical of the Victorian building typology once ubiquitous in Kentish Town. Whilst some redevelopment has occurred in recent years, the bulk of planning proposals since the last extension to its boundary (designated in 1985) have been for residential alterations, conversions, extensions and works to trees. Outside the conservation area there is pressure on backland sites, for example land between Grafton Crescent and Castlehaven Road, the development of which would affect the setting of the conservation area.¹³³
- 7.7.6 The Kentish Town Conservation Area has at its core the village of Kentish Town located in the old parish of St. Pancras, on the Kentish Town Road running north-south from Highgate to St. Pancras. The village settlement can still be perceived in the remaining eighteenth and early nineteenth century core, and has been absorbed but not erased by urban expansion over the late 19th and early 20th century.
- 7.7.7 The capacity for new development is low within the conservation areas of the plan area. Incremental reinstatement of quality details, reinstating garden walls and railings and front gardens, will enhance the area. There are also a few buildings identified as either negative or neutral contributors which would benefit from enhancement. It is thought that high quality new public realm improvements outside the area by the railway would enhance the approach to the area from Kentish Town Road. There are no Buildings at Risk.¹³⁴
- 7.7.8 The 2013 register showed a total of 40 'Buildings at Risk' entries, three less than the 2012 figure. Overall, the number of buildings on the Risk Register has been falling, with the total 'at risk' having fallen by 15 since 2009.¹³⁵ Camden Council's Community Investment Programme intends to invest some of the funds raised in securing the future of parks and historic buildings.¹³⁶

7.8 Housing

- 7.8.1 Camden is facing increased demand for new homes, with the rate of growth in demand slightly exceeding growth in the total population of the borough. Camden's population has grown by 4.1% between 2001 and 2011, whilst the number of households has increased by 6.2%. This trend is expected to accelerate, with the number of households expected to increase by a further 7% by 2026. A significant factor driving this trend is growth in the proportion of single person households.¹³⁷

¹³² LB Camden (2003) Inkerman Conservation Area Statement.

¹³³ LB Camden (2011) Kelly Street Conservation Area Appraisal and Management Strategy.

¹³⁴ LB Camden (2011) Kentish Town Conservation Area Appraisal and Management Strategy.

¹³⁵ LB Camden (2013) Authority Monitoring Report [online] available at: <https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/core-strategy/evidence-and-supporting-documents.en> (accessed 01/15)

¹³⁶ LB Camden (2014) Community investment programme [online] available at: <http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/placeshaping/twocolumn/the-community-investment-programme.en> (accessed 01/15)

¹³⁷ LB Camden (2011) A future for housing in Camden Camden's housing strategy 2011- 2016 [online] available at: <http://www.camden.gov.uk/ccm/content/housing/housing-policy-and-strategies/camdens-housing-strategy.en> (accessed 01/15)

- 7.8.2 The costs of buying or renting a home on the open market within Camden are amongst the highest in London. In December 2012, the mean house price in the borough stood at £822,096, up from £595,484 in December 2008. This figure is almost 14 times higher than the mean income of those living in the borough. House prices have been increasing much more steeply in Camden than nationally. 23% of Camden residents identify a lack of affordable housing as one of the three issues of most concern to them.¹³⁸
- 7.8.3 In 2008, the most recent assessment of housing need in Camden found that an additional 4,787 affordable homes a year over a five year period would be necessary to meet current and newly arising need. In particular, the study highlighted the need for larger social rented homes, plus the ability of over half of households in need of affordable housing to cover the costs of intermediate housing, rather than social rented.
- 7.8.4 Rates of affordable housing completion have been well below the rates recommended in the assessment of housing need. Over the past five years, net affordable housing completion was highest in 2008/09 at 402, although the second highest number of completions was in 2012/13 at 299.¹³⁵ The number of households applying for social housing in Camden increased by more than 50% from the end of 2005, reaching 22,000 in April 2011.
- 7.8.5 Camden's 2008 Housing Needs Assessment also identified 5,540 overcrowded households in the borough, a figure representing 5.7% of all households. In total it is estimated that 13,905 households in the borough are living in unsuitable housing (12.7% of all households). This highlights the shortage of family accommodation in the borough, particularly social-rented.¹³⁸
- 7.8.6 The Council has made housing the priority for land use through its LDF. It estimates that 12,250 additional homes will be provided in Camden between 2011/12 and 2024/25. In particular development is to be promoted in growth areas and town centres, with support for increased density in central London, town centres and other locations which are well served by public transport.¹³⁸
- 7.8.7 Through its Community Investment Programme, Camden council expects to support the delivery of a total of 2,750 new homes. Of these, 500 will be new council rented homes, 200 new shared ownership homes, 400 replacement council rented homes, and 1,650 new private homes which will be marketed to local people first.

7.9 Landscape and townscape

- 7.9.1 There are no landscapes of national protection status in the KTNP area, although the area has a number of green and open spaces which are highly valued by the local community.
- 7.9.2 The strategic view from Parliament Hill to St. Paul's in central London (Protected Vista 2A.1), through the plan area, is protected under the London Plan.¹³⁹ The Strategic Viewing Corridor from Kenwood to St. Paul's also falls across the western edge of the Kentish Town conservation area.

¹³⁸ Government Statistics, Live tables on housing market and house prices, Table 581 Housing market: mean house prices based on Land Registry data, by district, from 1996 (quarterly); Live tables on housing market and house prices, Table 577: ratio of median house price to median earnings by district, from 1997, [online] available at:

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-housing-market-and-house-prices> (accessed 01/15)

¹³⁹ Mayor of London (2012) London View Management Framework Supplementary Planning Guidance, London Plan 2011 [online] available at: <https://www.london.gov.uk/sites/default/files/archives/LVMF%20low%20res%20part%201.pdf> (accessed 01/15)

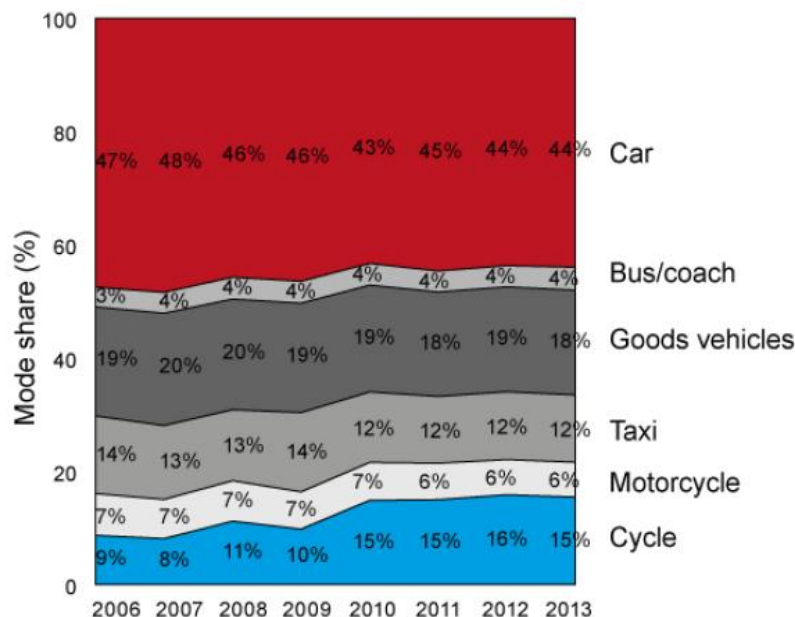
- 7.9.3 The London Landscape Framework combines elements of Landscape Character Assessment and Historic Landscape Characterisation as a direct response to the unique circumstances of London's Natural Landscapes. It divides London into Landscape Types, groups of areas of land which share common physical characteristics. Of the 22 individual Natural Landscape Areas (NLA) highlighted by this assessment, the Camden and the NDP area fall within the 'Clay Ridges' landscape type specifically associated with the 'Hampstead Ridge'. The key natural signature of this area is 'a mosaic of ancient woodland, scrub and acid grasslands along ridgetop summits with panoramic views'.¹⁴⁰
- 7.9.4 In terms of the townscape, the Kentish Town Road forms the spine of the Kentish Town centre. The area around the stations (underground and train) is viewed by many to be the 'gateway' to the neighbourhood and during peak travel times is the most heavily used part of the area. The space created by the road bridge at the northern end of the high street has an identity that is recognised by residents and people passing through. This is partly because of its sense of openness which interrupts the street elevations and allows views to Parliament Hill / Hampstead Heath. The Assembly House public house, a fine example of 19th century architecture, also marks the junction with Leighton Road. The space acts as a threshold to Kentish Town's high street.
- 7.9.5 The design of the public space in this part of Kentish Town Road is poor and does not respond to the 'gateway' importance of the place. Problems include narrow pavements, lack of space and poorly planned junctions, particularly with Regis Road. Pedestrian crossings do not allow for natural desire lines and there is no provision of cycle routes. Inappropriate development over the decades has left a legacy of poorly designed frontages, out of keeping with the local area and impacting negatively on the visual amenity and sense of the area.
- 7.10 Transport**
- 7.10.1 The 2011 Camden Transport Strategy notes whilst the borough is well served by public transport, including several London Underground lines, the London Overground network, and three mainline national and one international railway station, the borough faces many transport challenges. In particular there will be a need to support the areas growing population, with this increase expected to place significant extra pressure on the transport network in the borough and surrounding areas.¹⁴¹ The emergence of the proposed High Speed Two (HS2) railway terminus at Euston has London-wide significance.¹⁴²
- 7.10.2 There has been significant change in the modes of transport used by Camden residents over recent years. According to data for the period 2006 to 2013, bicycles increased from 9% to 15% of the proportion of all traffic. In contrast, travel by car has declined as a proportion of traffic with a fall from 47% in 2006 to 44% in 2012. Figure 7.8 below illustrates recent changes in transport mode in Camden. Overall levels of traffic in Camden have decreased significantly since 1993 in contrast to the national and regional trends of increasing traffic. Between 2002-2012 traffic flows in Camden reduced 25%.

¹⁴⁰ Natural England (2011) London's Natural Signatures: the London Landscape Framework [online] available at: <http://publications.naturalengland.org.uk/publication/6540238365130752> (accessed 01/15)

¹⁴¹ LB Camden (2011) Camden Transport Strategy and Local Implementation Plan [online] available at: <http://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/camdens-local-implementation-plan.en> (accessed 01/15)

¹⁴² LB Camden (2012) Euston AAP SA Scoping Report [online] available at: <http://www.eustonareaplan.info/wp-content/uploads/2012/09/Euston-Area-Plan-SA-Scoping-report-merged-19-09-2012.pdf> (accessed 01/15)

Figure 7.8: Change in transport modal share in Camden over time



- 7.10.3 In 2011, 62% of households in Kentish Town ward and Cantelowes ward had no access to a car or van, with 33% of households having access to 1 Car or Van.¹⁴³
- 7.10.4 Taking Kentish Town stations (Kentish Town station (London Underground and Thameslink) and Kentish Town West station (London Overground)) as a starting point, the Public Transport Accessibility Levels of the NDP area are very high, with scores of 6a to 6b, the highest levels obtainable.¹⁴⁴ There is however a lack of accessibility to all railway and underground stations in the area. A variety of bus routes, including 24-hour routes, also serve parts of central London. Outside the rail stations the bus stop services four important bus routes.
- 7.10.5 Kentish Town Road has benefited from a range of improvement works in recent years, but there may still be some areas that would benefit from further upgrading. Examples of improvements that have already taken place include improved pedestrian crossings at the junction of Prince of Wales Road and Kentish Town Road, creation of local squares at Farrier Street and Rochester Road and new cycle stands and public seating. However, there are considered to be problems with congestion in some areas. Kentish Town Road itself is a heavily used route and is often congested.¹⁴⁵
- 7.10.6 A potential route adjacent to the railway has been identified as a 'missing green corridor' in the Local Development Framework. There is also a wider opportunity to promote walking throughout the area through making further improvements to the street environment to enhance residents' and visitors' enjoyment.
- 7.10.7 The Kentish Town Road (A400) is identified as a Key Cycling Corridor (London Cycle Network). Camden, in conjunction with a number of other London boroughs, has introduced a network of Legible London signage - pedestrian signage - that extend as far north as Kentish Town and Swiss Cottage.

¹⁴³ ONS (2011) Census 2011, Car or Van Availability, 2011 (QS416EW)

¹⁴⁴ TfL (2014) TfL Planning Information Database [online] available at: <http://www.webptals.org.uk/> [online] accessed 01/15)

¹⁴⁵ LB Camden (2011) Shaping the future of the Kentish Town area – Engagement on Key Issues May 2011.

7.11 Water quality and water resources

- 7.11.1 The London borough of Camden Preliminary Flood Risk Assessment has not identified any past floods that are considered to have had significant harmful consequences but finds that future flood risk (associated with climate change – see Box 7.1) is likely to be an issue.¹⁴⁶

Box 7.1: Climate change projections for the UK and London

UK Climate Projections 2009 for London under a 2050s medium emissions scenario indicate that:¹⁴⁷

- The average summer day will be **2.7°C warmer** and very hot days 6.5°C warmer. By the end of the century the hottest day of the year could be 10°C hotter than the hottest day today.
- The average summer will be **19% drier** and the driest summer 39% drier than the baseline average.
- The average winter will be **14% wetter** and the wettest winter 33% wetter than the baseline average.

- 7.11.2 The key flood risk to Camden is from surface water flooding¹⁴⁸. This form of flooding occurs when the volume and intensity of a rainfall event exceeds the capacity of the drainage system. Surface water flooding was the cause of the two major flooding incidents in Camden in 1975 and 2002. There are approximately 38,800 properties in the Camden within areas at risk of surface water flooding at potential depths of >0.1m, plus 12,700 properties in areas at risk of flooding to potential depths of >0.3m.¹⁴⁹ Parts of Kentish Town experienced surface water flooding in 2002.¹⁵⁰

- 7.11.3 The borough also has a small risk of groundwater flooding which occurs when the water table rises to ground level and inundates low lying areas. There is a low risk of flooding from the Regent's Canal. Camden has no land within flood zones 2 and 3. Therefore, there are no properties at risk of fluvial (river) or tidal flooding in the borough of Camden.¹⁵¹

- 7.11.4 Sustainable Urban Drainage Systems (SuDS) are a low environmental impact approaches to draining dirty and surface water run off through collection, storage and cleaning, before slow release back into the environment. It is designed with the aim of preventing flooding, pollution and the contamination of groundwater. In 2010/11, Camden approved 35 schemes with planning conditions requiring SuDs, plus a further 20 schemes in 2011/12.¹⁵²

Water use and quality

- 7.11.5 Camden is located within Thames Water's supply area. The Environment Agency has classified this borough as being in an area of serious water stress. Levels of household water usage in Camden are two litres per person per day (l/p/d) higher than the London average of 164 l/p/d and 21 l/p/d higher than the England and Wales average of 145 l/p/d. Levels of household water use per person in the borough have not declined over the past decade, remaining consistently high above the national average (Figure 7.9).

¹⁴⁶ LB Camden (2011) Preliminary Flood Risk Assessment [online] available at: <http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/fiho1211bvli-e-e.pdf>

¹⁴⁷ GLA (2011) The draft climate change adaptation strategy for London: Public consultation draft [online] available at http://legacy.london.gov.uk/mayor/priorities/docs/Climate_change_adaptation_080210.pdf (accessed 01/15)

¹⁴⁸ LB Camden (2012) Surface Water Management Plan 'Drain London' [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset/?sessionid=D94BF9EFEE2E36A2074A2367A225FDA1?asset_id=2937557andbcsi_scan_E956BCBE8ADBC89F=1

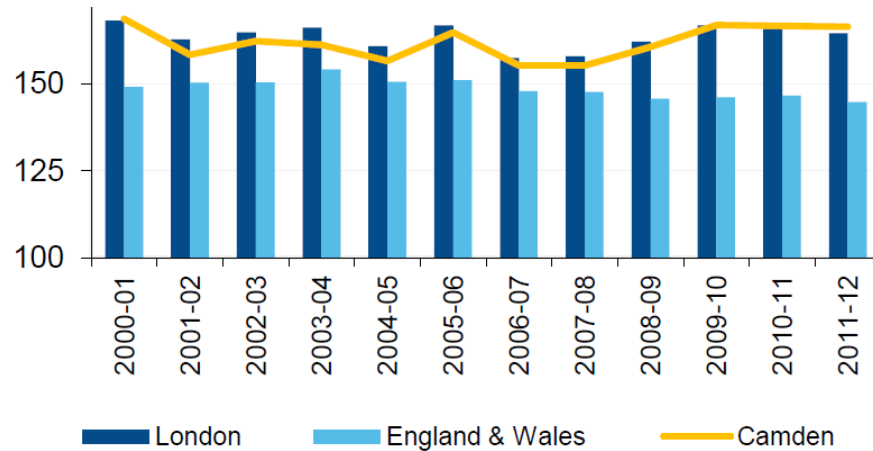
¹⁴⁹ Environment Agency (2013) Camden: London borough Environmental Fact Sheet [online] available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/static/documents/Research/Camden_2013.pdf (accessed 01/15)

¹⁵⁰ LB Camden (2013) Managing flood risk in Camden: The London borough of Camden flood risk management strategy [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=3088989 (accessed 01/15)

¹⁵¹ Environment Agency (2013) Camden: London borough Environmental Fact Sheet [online] available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/static/documents/Research/Camden_2013.pdf (accessed 01/15)

¹⁵² LB Camden (2013) Authority Monitoring Report [online] available at: <https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/core-strategy/evidence-and-supporting-documents.en> (accessed 03/14)

Figure 7.9: Household water use in Camden per capita (litres per day)



7.11.6

The Water Framework Directive (WFD) is European legislation that is designed to protect and enhance the quality of our rivers, lakes, streams, groundwater, estuaries and coastal waters, with a particular focus on ecology. There are two WFD designated water bodies that flow through Camden; the Grand Union Canal and Regent's Canal, plus a further three water body catchments that extend across the borough boundaries. Of these water bodies:

- Three were classed as being of 'moderate' ecological status: Grand Union Canal (Paddington Arm); Regent's Canal; Dollis Brook.
- Two were classed as being of 'poor' ecological status: Brent (below Silk Stream to Thames); Lee (Tottenham Lock to Tideway).

8 WHAT ARE THE KEY ISSUES / OBJECTIVES THAT SHOULD BE A FOCUS OF SEA?

The Environmental Report must include:

- Any existing problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

8.1.1 The following table presents the sustainability issues and objectives established through SEA scoping, i.e. in-light of context/baseline review and consultation. Issues / objectives are grouped under the ten sustainability 'topic' headings identified at the outset of scoping. Taken together, these sustainability topics, issues and objectives provide a methodological 'framework' for assessment.

8.1.2 The objectives draw heavily on those that have been identified through scoping work undertaken by Camden Council as part of Sustainability Appraisal (SA) for the Camden Core Strategy and (more recently) the Euston Area Action Plan. **Appendix II** presents the full list of sustainability objectives established within the Euston Area Action Plan SA Scoping Report.

Table 8.1: The SEA Framework

Topic	Key issues	Key objectives
Air quality and noise	Air quality in Camden is poor and does not meet the air quality standards for nitrogen dioxide and particulate matter. The whole of Camden has been designated as an Air Quality Management Area. Ambient noise levels associated with traffic flows will be an issue locally	1. Contribute to an improvement of air quality 2. Ensure that noise from existing and new developments and operations will not affect noise sensitive land uses 3. Ensure new noise sensitive uses are not located near existing established noise generating uses
Biodiversity	Sites of particular biodiversity importance are limited locally, but open space and other elements of green infrastructure (e.g. green roofs) can contribute to the 'ecological network' that exists at a Camden / North London scale. Access to nature is important from a biodiversity conservation perspective, i.e. there is a need to build appreciation of urban biodiversity.	4. Protect and enhance existing habitats and biodiversity and seek enhancements. 5. Protect and enhance natural habitats in the area, particularly those associated with priority species 6. Deliver targeted habitat creation, including through the provision of open space and green roofs. 7. Protect and provide for the planting of more trees
Climate change mitigation (non-transport related)	There is a nationally recognised need to increase the energy efficiency of new and existing buildings and install more renewable energy facilities on new and existing buildings There is a nationally recognised need to encourage the movement of waste up the hierarchy	8. Promote designs that facilitate efficient use of energy and support the generation and use of renewable and low carbon energy 9. Reduce the amount of waste requiring final disposal, including waste associated with the development process

Topic	Key issues	Key objectives
Community and well-being	Population growth is a significant issue in Kentish Town plan area and Camden as a whole. There will be a marked increase in the elderly population. Camden's population is highly culturally and ethnically diverse Camden includes areas of relative affluence and deprivation, and this is reflected to some extent in the plan area. Crime consistently appears as a priority issue for residents and businesses There is a deficiency of open space in terms of accessibility of high quality usable open spaces and parks.	10. Promote healthy living through e.g. provision of walking, cycling and recreation facilities 11. Help reduce levels of crime and fear of crime 12. Ensure access to local shopping, community, and leisure facilities and access to quality open space including children's play space 13. Tackle poverty and social exclusion 14. Encourage development that facilitates social cohesion 15. Encourage development opportunities in those areas in need of economic development 16. Promote access to employment opportunities for local people 17. Protect existing and provide for new education facilities to meet needs
Economy	Demand for housing development means that the pool of employment land has been eroded, and this trend is set to continue. Retail in Kentish Town Centre remains vibrant. Kentish Town Centre is identified as a 'placeshaping' area in Camden's LDF, where the Council has identified opportunities to bring together strategies, investment, services, facilities, public realm and infrastructure improvements in a holistic approach to "shape" these areas in response to community needs. 73% of the plan area residents are economically active, which is significantly higher than Camden (68%), London (72%) and national (70%) values, subsequently the ward has lower levels of unemployment and residents whom are economically inactive due to retirement, education, caring for family or long term illness.	18. Support development in existing centres and ensure the health of town centres 19. Encourage the retention and growth of existing, locally based industries and businesses 20. Accommodate new and expanding businesses 21. Encourage new investment in the local economy and promote development opportunities for employment 22. Focus growth on Core Strategy retail growth areas and designated frontages within the retail hierarchy

Topic	Key issues	Key objectives
Heritage	Four conservation areas fall within the NDP area, and there are numerous listed buildings. Development pressure and alterations to residential development with incremental intensity of residential use on a decline in local retail have had a negative impact on the area. There are also many heritage assets in areas adjacent to the NDP area boundary some of which could be affected by development in the area.	23. Promote high quality and sustainable urban design which protects and enhances the historic environment 24. Ensure enhancement of the public realm and local distinctiveness, taking into consideration the characteristics of the existing townscape and strategic views 25. Ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value
Housing	The costs of buying or renting a home on the open market within Camden are amongst the highest in London. 23% of Camden residents identify a lack of affordable housing as one of the three issues of most concern to them Rates of affordable housing completion have been well below the rates recommended in the assessment of housing need.	26. Promote the provision of a range of high quality and affordable housing to meet local needs 27. Increase the net supply of housing, including affordable housing 28. Provide housing for people, particularly families, on low to moderate incomes 29. Encourage development at an appropriate density, standard, size and mix
Landscape / townscape	There are no landscapes of national protection status in the Plan area, although the area has a number of green and open spaces which are highly valued by the local community. The protected strategic view of Parliament Hill to St. Paul's Cathedral traverses the plan area, while views of Hampstead Heath are locally important. Kentish Town Road forms the spine of the Kentish Town centre. The area around the stations is viewed by many to be the 'gateway' to the neighbourhood.	30. Encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair 31. Ensure efficient use of land through maximising densities where appropriate

Topic	Key issues	Key objectives
Transport	According to data for the period 2006 to 2013, bicycles increased from 9% to 15% of the proportion of all traffic. The Public Transport Accessibility Levels of the NDP area are very high. In 2011, 3,598 (62%) of households in Kentish Town ward and 3,170 (62%) of households in Cantelowes ward had no access to a car or van, with 33% of households having access to 1 Car or Van. There are considered to be problems with congestion in some areas.	32. Reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area 33. Encourage development at locations that enable walking, cycling and/or the use of public transport 34. Enhance permeability and encourage the provision of infrastructure for walking, cycling and/or the provision of public transport 35. Encourage an increase in car free and car capped housing 36. Guide significant travel generating developments towards areas with high public transport accessibility 37. Locate significant travel-demand generating uses, including new housing, in areas with high public transport accessibility and local services.
Water, flood risk and other climate change adaptation issues	Increases in the amount of built land can cause flooding problems in parts of Camden. The NDP area does not fall within Flood Zones 2, 3a and 3b. However it is within a critical drainage area as identified in the Camden Surface Water Management Plan. Further mapping has shown that areas within the NDP area are at risk.	38. Protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change 39. Promote the sustainable use of water resources 40. Require development that incorporates sustainable drainage 41. Help to reduce the risk of flooding and increase flood resilience, including surface water flooding

PART 2

WHAT HAS PLAN-MAKING / SEA INVOLVED UP TO THIS POINT?

9 INTRODUCTION TO PART 2

The Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in-light of alternatives assessment (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

This part of the report has been updated since publication of the pre-submission version of the plan. Specifically, this part has been updated to ensure that up-to-date information is presented regarding consideration of 'reasonable alternatives'.

9.1.1 The 'story' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this part of the report explains how preparation of the draft plan has been informed by assessment of **alternatives** in relation to a headline policy area / issue.

9.1.2 Specifically, this part of the report presents information on alternatives in relation to the **Kentish Town Potential Development Area**, i.e. the issue set to be addressed through Policy SP2 of the plan.

Structure of this part of the Environmental Report

9.1.3 This part of the report is structured as follows:

Chapter 10 - Introduces the alternatives that have been a focus of assessment

Chapter 11 - Presents alternatives assessment findings

Chapter 12 - Explains the reasons for developing the preferred approach (i.e. draft plan) in-light of alternatives assessment findings.

9.1.4 This structure reflects the regulatory requirement to present an appraisal of 'reasonable alternatives' as well as 'outline reasons for selecting the alternatives dealt with' within the Environmental Report.

How else has SEA fed-in?

9.1.5 Whilst there is only a requirement for one SEA step - namely assessment of reasonable alternatives - to 'feed-in' and influence plan-making ahead of the draft plan consultation, in practice it is typical for the plan-making / SEA process to be more iterative, and that has been the case here. Alternatives were first developed and assessed in early 2015, at the time when the pre-submission version of the plan was being finalised for consultation. Alternatives assessment findings were then published for consultation within the Environmental Report published alongside the pre-submission version of the plan in March 2015. Also, the March 2015 Environmental Report presented an assessment of the draft plan as it stood at that time.

9.1.6 There is not a focus on explaining these aspects of past SEA work within this report; however, key points are noted as appropriate.

10 REASONS FOR SELECTING THE ALTERNATIVES DEALT WITH

10.1 Introduction

10.1.1 The aim of this chapter is to explain the reasons for focusing alternatives assessment on a single policy area – Kentish Town Potential Development Area; and to introduce / explain the alternatives that were a focus of assessment.

10.2 Reasons for focusing on a particular policy area

10.2.1 The SEA Regulations establish a need to take account the plan objectives when determining what ‘reasonably’ must be the focus of alternatives assessment.

10.2.2 It is not a stated objective to establish a spatial strategy for the area, reflecting the built up nature of Kentish Town. Rather, objectives relate to: defining policy for two ‘spatial areas’ within the wider plan area; defining policy for a range sites; and defining policy for a range of area-wide, thematic issues.

10.2.3 There is no potential to assess alternative combinations of sites that might be allocated / assigned site specific policy through plan. The sites that are set to be the focus of policy are those that emerged through early plan-making work and consultation, and no sites were ‘rejected’ (i.e. no policy choice has been made in this respect). Also, thematic policy areas need not be the focus of formal alternatives assessment, reflecting their less contentious nature / low likelihood of resulting in significant effects. As such, it was recognised that it is the policy approach to specific spatial areas / sites that (‘reasonably’) should be the focus of alternatives assessment.

10.2.4 Each of the specific spatial areas / sites that are due to be a focus of policy was ‘screened’ to determine whether alternatives assessment was warranted. Account was taken of the objective for each site that has been determined by the Neighbourhood Forum. The following points explain reasons for **screening out sites**:

- Kentish Town Square – There is little leeway given the tightly defined objective for the site. It might be suggested that there is the potential to take a more ambitious approach, to involve substantial decking over of the railway line, however, it is not clear at the current time that such an approach is feasible/deliverable. The preferred policy approach has developed on the basis of extensive technical work and consultation, and it is not clear that there is an alternative strategy that needs to be formally explored. It is also the case that development of the Town Square is to some extent a ‘project’ that will be delivered through various means, including those not directly related to planning. It is not clear to what extent planning policy established through KTNP will have a direct bearing on decisions taken in relation to the square; and in this light there is less of an argument in favour of formally considering alternatives.
- Car Wash Site at 369-377 Kentish Town Road – The site clearly lends itself to mixed-used development, and can also be considered to be of lesser strategic importance.
- York Mews, the Section House and the land around the Police Station – The site lends itself to residential development (certainly given the assumption that the adjacent Kentish Town Industrial Area will be developed as a mixed use area).
- Frideswide Place / Kentish Town Library – The site lends itself to residential-led mixed use development, and the intention is that the policy should remain high level.
- Wolsey Mews – This road clearly lends itself to mixed-use development. There are virtually no other parallel streets running either side of the High Street, which makes this an ideal location for affordable and smaller scale premises for independent shops and other service sector businesses. The road is already developing organically in this fashion.
- 2 Prince of Wales Road – There is little leeway given the tightly defined objective for the site. Any policy would seek to ensure reinstatement as a leisure/entertainment facility.

- Veolia Depot site in Holmes Road/Spring Place – There is little leeway given a tightly defined objective. Given its location, any policy would be for residential-led mixed use development.
- Small sites for infill – There is a clear preferred approach that has emerged from a review of all available options. There are no other reasonable options that might be included in the list, nor is it the case that any of the preferred sites stand-out as questionable.

10.2.5 Subsequent to this screening process, it was determined that one ‘spatial area’ - **Kentish Town Potential Development Area** – should be a focus of alternatives assessment. This policy area stands out as being of strategic importance. Depending on the approach taken, there is the potential for significant impacts to the sustainability baseline (positive and/or negative) and there is known to be considerable interest in the future of the area (and hence there is merit to presenting information on alternatives).

10.2.6 For other areas/sites set to be assigned policy under plan objectives 6/7, and indeed other thematic policy areas set to be addressed under other plan objectives, it was determined that there need not be formal assessment of alternatives. Rather, it was felt appropriate for a preferred (draft plan) approach to be determined without formal SEA input, and then for the preferred approach to be assessed against the baseline (aka the ‘do nothing option’) as part of the assessment of the draft plan (see Part 3 of this Report).

10.3 Reasons for selecting alternatives

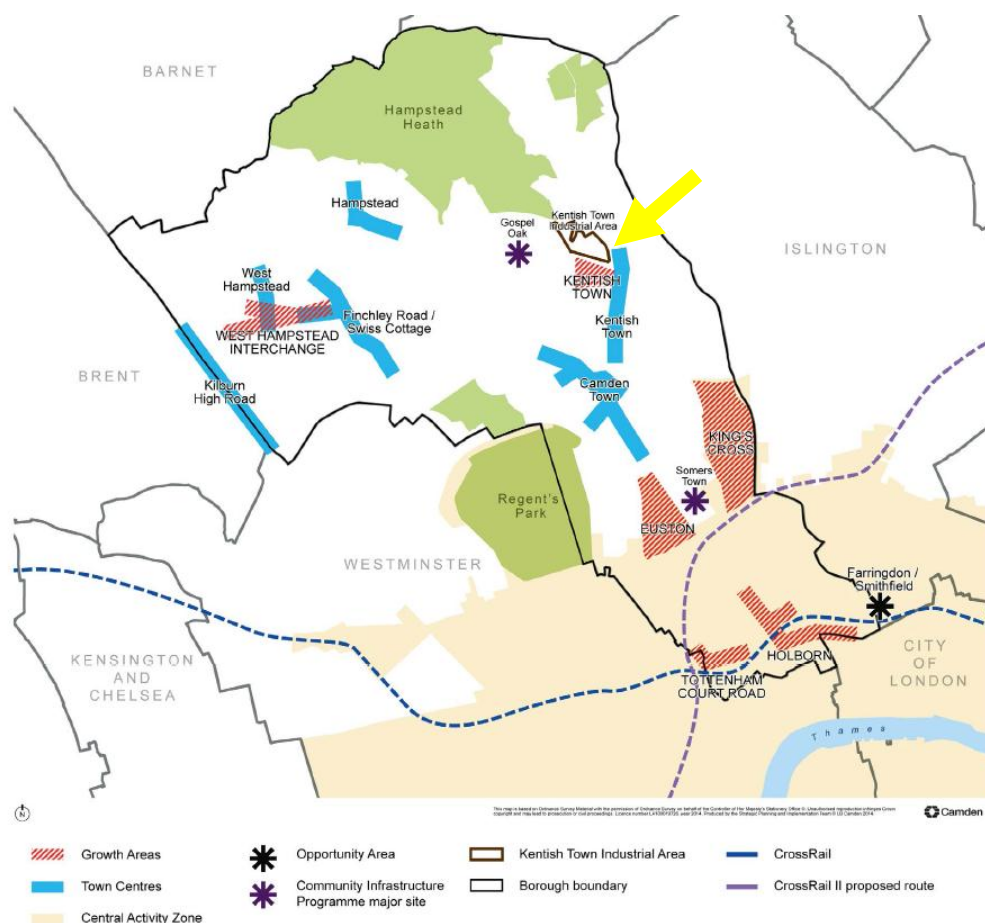
10.3.1 The Kentish Town Potential Development Area, which comprises the adjacent Regis Road and Murphy Sites, stands out considerably as an opportunity area. There are no other sites where there is the potential for significant development in order to meet housing and employment needs (and contribute to wider plan objectives, notably those around movement and revitalising the Kentish Town Road). As such, the aspiration of KTNF is for a comprehensive redevelopment of the sites.

10.3.2 It is also now the aspiration of Camden Council that part of the site (the Regis Road part) should be a strategic location for development and change. This is the position within the recently published Draft Camden Local Plan consultation document - see Figure 10.1. This policy position is a departure from that set out within the adopted Core Strategy (2010). Under Policy CS8 of the adopted Core Strategy it is stated that:

“There are few concentrations of industrial and warehousing uses left within Camden. The area between Kentish Town and Gospel Oak [Kentish Town Industrial Area] is the only area of land in the borough to have a mix of such uses and no housing, making it particularly suited for continued employment use (see Proposals Map). The Council will retain this Industry Area for industrial and warehousing uses by resisting any proposals that would lead to the loss of sites in Use Classes B1(b), B1(c), B2 and B8 and sui generis uses of a similar nature. Development should not prejudice the nature of the Industry Area by introducing inappropriate or conflicting uses.”

10.3.3 Furthermore, the Greater London Authority (GLA) has expressed a strong interest in the future of the site, highlighting the need to manage the existing stock of industrial land and premises in line with the Mayor’s strategy set out in London Plan Policy 4.4. They emphasise that significant changes to locally significant industrial sites should be considered in the context of their strategic function in London’s economy.

Figure 10.1: The emerging Camden Local Plan Key Diagram



- 10.3.4 When looking to establish alternative approaches to redevelopment of the site it was recognised that:
- A preferred approach had already emerged through consultation with local residents, wider stakeholders and also developers. This would essentially involve a ‘a mixed use development whilst retaining, and where possible increasing, the level of industrial floorspace and employment opportunities including the growth of small and start-up businesses’.
 - The objective of the plan is to develop a broad-brush, high level policy approach only. There will of course need to be subsequent work around masterplanning and infrastructure delivery (taking into account viability considerations), but it is not possible to go into detail through the current Neighbourhood Plan given the uncertainties involved. For example, it may or may not transpire that it is possible to bridge or deck over the railway line that currently divides the industrial area into two.
- 10.3.5 It was difficult to envisage alternatives to the emerging broad preferred approach; however, ultimately it was determined that there was merit in ‘taking a step back’ and appraising the following two alternatives:
- Option 1 – High density (in terms of housing) mixed-use development of the site
 - Option 2 - Low density (in terms of housing) mixed-use development of the site.
- 10.3.6 These alternatives are somewhat crude, but there is merit in assessing them in that assessment findings help to frame and ‘illuminate’ the emerging preferred policy.

11 ALTERNATIVES ASSESSMENT FINDINGS

11.1 Introduction

- 11.1.1 The aim of this chapter is to present summary assessment findings in relation to the alternatives introduced above, i.e. the two broad conceptual approaches that might be taken to redevelopment of the Kentish Town Potential Development Area.

11.2 Methodology

- 11.2.1 For each option the assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics and issues/objectives identified through scoping as a methodological framework. **Red** text / shading is used to indicate significant negative effects, whilst **green** text / shading is used to indicate significant positive effects.
- 11.2.2 Effects are predicted taking into account the criteria presented within the SEA Regulations.¹⁵³ So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for 'cumulative' effects is also a consideration.
- 11.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the options will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.
- 11.2.4 In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

11.3 Summary assessment findings

- 11.3.1 **Table 11.1** presents summary assessment findings in relation to the alternatives, drawing on the topics established through scoping (see Part 1) as a methodological framework. The full assessment is provided in **Appendix III**.

¹⁵³ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Table 11.1: *Summary assessment findings*

(1) High density (in terms of housing) mixed-use development of the site (2) Low density (in terms of housing) mixed-use development of the site		
Topic	Effect categorisation / Rank of preference	
	Option 1	Option 2
Air quality and noise	1	2
Biodiversity	1	2
Climate change mitigation (non-transport related)	2	1
Community and well-being	1	1
Economy	?	?
Heritage	1	1
Housing	2	1
Landscape / townscape	1	2
Transport	2	1
Water, flood risk and other climate change adaptation issues	1	2
<u>Summary</u> A high density redevelopment would lead to the potential to maximise positive effects in terms of ‘housing’ objectives (i.e. there will be good potential to deliver affordable and specialist housing) and also climate change objectives (i.e. there will be good potential to deliver decentralised energy solutions). It may also be that it is preferable from a ‘community and well-being’ perspective; however, there are some uncertainties. A notable uncertainty is highlighted in terms of the ‘economic’ effects of a high density redevelopment. On the one hand it is a positive as it will be possible to increase the number of jobs on site and support a range of important growth sectors; but on the other hand there are concerns regarding the long term effect of losing light industrial space (given a London-wide trend towards high density mixed use redevelopment of light industrial land). Whilst there will be the potential to retain light industrial space as part of a mixed use redevelopment, this will obviously be constrained to some extent by housing under a high density scheme. With regards to biodiversity and landscape considerations it is possible to conclude with more certainty that a high density scheme could lead to problems; however, there is still considerable uncertainty. Landscape issues (i.e. views across the site) are a priority consideration, but it is not clear that there is risk of any significant impacts. With regards to biodiversity, it will be important that the green corridor running through the site (along the railway embankment) is taken into consideration as part of future work to explore options.		

12 REASONS FOR SELECTING THE PREFERRED APPROACH

12.1 Introduction

- 12.1.1 This section sets out KTNF's reasons for selecting/developing the preferred approach to Kentish Town Potential Development Area subsequent to and in-light of alternatives assessment.

12.2 Reasons

- 12.2.1 The Regis Road site comprises an area of approximately 7.5 hectares and the Murphy site comprises an area of 6.8 hectares. Both sites are currently underused but, in Camden's draft Local Plan, the Regis Road part of the Kentish Town Industry Area is designated "for comprehensive mixed use development, including significantly increased employment opportunities and new homes". In the draft Local Plan Camden Council states they will protect "existing business premises (offices as well as industry and warehousing) unless redevelopment can better meet economic and employment objectives and other priorities, for example housing/affordable homes".
- 12.2.2 A variety of different businesses operate from the **Regis Road site** (which, to reiterate, is safeguarded as an employment designation in Camden's Core Strategy, but proposed as a growth area within Camden's emerging Local Plan). As the site is currently generally only occupied by single or double storey sheds, open air yards, parking and the access road, future buildings should reflect the density and scale of an inner London location. New buildings are encouraged to be taller and to include housing and other uses in conjunction with the retained employment allocation. A mixed use approach will be taken to the development of the site, which will result in some residential buildings incorporating active commercial units at ground level, where appropriate."
- 12.2.3 The main body of the **Murphy site** (which, to reiterate, is safeguarded as an employment designation in Camden's Core Strategy) is occupied by three storey offices, sheds, yards, and a depot for a construction and civil engineering company. The site is intended for mixed use with a combination of employment, residential, and other uses to intensify the use of the site and take advantage of its good public transport links.
- 12.2.4 KTNF's preferred policy approach inevitably has some drawbacks (as highlighted in the SEA alternatives assessment). This is the last dedicated area of light industrial land and warehousing in Camden; however, whilst the land is valuable in its current use, there is an acute need to deliver housing, offices and space for 'start ups'. Light industrial space will be maintained through good design, and negative effects will be mitigated through a focus on skills development and training.
- 12.2.5 KTNF's policy is, on balance, preferred because:
- There is an extreme shortage of housing in Camden (and in London in general), and the policy will provide a very large number of homes.
 - During public consultation, people in Kentish Town have said that the Industrial Area is not integrated within the community and they would like to see housing included in the area.
 - The policy is written in a way that seeks to mitigate any negative effects. It states that new proposals must allow for employment levels on the Regis Road site to be no less than those existing on the same site area and that, on the Murphy site, light industrial uses will be allowed to continue to operate, alongside residential uses, in order to ensure the continuing viability of these uses.
- 12.2.6 Finally, it is important to reiterate that Regis Road mixed use re-development is dependent on forthcoming Camden Local Plan examination; and that Camden's current and emerging plans safeguard Murphy Site for employment use and do not propose redevelopment.

PART 3

WHAT ARE THE SEA FINDINGS AT THIS STAGE?

13 INTRODUCTION TO PART 3

The Environmental Report must include...

- The likely significant effects associated with the draft plan approach
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach

This part of the report has been updated to a limited extent. Given time and resources, there has been limited potential to examine all changes made to draft plan (since publication of the pre-submission version and Environmental Report in March 2015) in detail, and so efforts have been targeted at key aspects of the plan and key sustainability issues/objectives.

Updates are primarily presented within the 'Conclusions' subsections below.

- 13.1.1 The aim of this part of the report is to present the assessment of the Draft ('submission' version) Plan, and also to present 'conclusions at this current stage'.

14 ASSESSEMENT OF THE DRAFT PLAN

14.1 Methodology

- 14.1.1 The assessment is structured under the following 10 sustainability 'topic' headings:

- | | |
|---|--|
| • Air quality, noise and other environmental quality issues | • Heritage |
| • Biodiversity | • Housing |
| • Climate change mitigation (non-transport) | • Landscape / townscape |
| • Community and well-being | • Transport |
| • Economy | • Water, flood risk and other climate change adaptation issues |

- 14.1.2 For each topic a range of sustainability objectives (as identified through scoping) are listed. Taken together, the sustainability topics and objectives provide a methodological 'framework' for the assessment of likely significant effects on the baseline.

- 14.1.3 Within each sustainability topic chapter 'significant effects' of the draft plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.¹⁵⁴ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect 'characteristics' are described within the assessment as appropriate.

- 14.1.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

- 14.1.5 Within each assessment narrative, prior to drawing conclusions on the effects of the draft plan, stand-alone consideration is given to the effects of 1) Plan-wide policies; and 2) Site-specific policies.

¹⁵⁴ Environmental Assessment of Plans and Programmes Regulations 2004

15 AIR QUALITY AND NOISE

15.1 Relevant sustainability objectives

- Objective 1: Contribute to an improvement of air quality
- Objective 2: Ensure that noise from existing and new developments and operations will not affect noise sensitive land uses
- Objective 3: Ensure new noise sensitive uses are not located near existing established noise generating uses

15.2 Assessment of policies

- 15.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 15.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 15.1: Summary of policy specific assessment text from the March 2015 Environmental Report

The KTNP does not contain any policies specifically related to air quality or noise. Indirectly some policies could be seen to address this issue, including policy relating to the potential decking over the railway line, and ensuring the environmental impact of development proposals is subject to air and noise assessment.

Site specific policy requires noise mitigation measures for development in the Kentish Town industrial area in accordance with Camden Policy DP28, and establishes an expectation that carbon emissions from buildings will be minimized.

Certain other site specific policies support development that is sensitive to nearby uses, particularly regarding noise and amenity for occupiers. Residential-led mixed-use development will be subject to measures that have the potential to increase air quality and reduce noise by introducing new pedestrian links, on-site cycle parking facilities, cycle links, enhanced public realm and tree planting.

15.3 Conclusions

- 15.3.1 The March 2015 Environmental Report concluded that -

The entire borough of Camden is designated as an AQMA due to exceedences in NO₂ and particulate matter (PM₁₀). The NP is not predicted to negatively affect air quality or noise through redevelopment, and indeed is likely to increase air quality and noise issues through the enhancement of the public realm and cycling infrastructure. Some question marks remain regarding noise/amenity implications of mixed use redevelopment within the Kentish Town Potential Development Area (given the aspiration of maintaining industrial uses); however, there is good potential to minimise impacts through masterplanning and design.

- 15.3.2 These conclusions hold true at the current time. There is no reason to suggest that any of the changes made to the plan since March 2015 have implications for air quality or noise.

16 BIODIVERSITY

16.1 Relevant sustainability objectives

- Objective 4: Protect and enhance existing habitats and biodiversity and seek enhancements.
- Objective 5: Protect and enhance natural habitats in the area, particularly those associated with priority species
- Objective 6: Deliver targeted habitat creation, including through the provision of open space and green roofs.
- Objective 7: Protect and provide for the planting of more trees

16.2 Assessment of policies

- 16.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 16.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 16.1: Summary of policy specific assessment text from the previous version of the Environmental Report

A number of policies are aimed at improving green space and biodiversity in the KTNP area. Green and open space policy supports the designation of existing public Local Green Spaces, and there is a particular focus on protection of existing open spaces on Council Estates. Another policy is focused on supporting the development of the Ingestre Wood and Nature Trail and planting alongside railways, and recognises the need to plan carefully for the maintenance of linear habitats along railways. Other issues addressed include the need for targeted habitat creation/enhancement within new developments, including through green roofs. The development of the Murphy site is identified in the plan as an opportunity to increase the biodiversity and effectiveness of green corridors, recognizing connectivity with Hampstead Heath.

Policy provides for the possible decking over of railway land to the west and/or east of the existing Kentish Town station. The railway corridor to the west of the station is one of the main biodiverse habitats in the KTNP area. Decking over the railway corridor to the west has the potential to have significant negative effects on biodiversity. At this stage it is not possible to say anything more definitive about potential effects on biodiversity although it is acknowledged that the proposed approach does require environmental impacts to be considered. It is also likely that a proposal for substantial decking would be subject to Environmental Impact Assessment (EIA).

16.3 Conclusions

- 16.3.1 The March 2015 Environmental Report concluded that -

The KTNP would likely lead to mixed effects in terms of biodiversity. Some policies aim to enhance or protect existing habitats, including through the extension of green corridors. The plan also encourages the creation of habitats through the landscaping and planting of native species in open spaces, private gardens and green roofs within new development. This would likely have a significant positive effect on biodiversity. However, decking over the railway corridor to the west could potentially have a significant negative effect on biodiversity through loss of part of a biodiverse habitat.

- 16.3.2 These conclusions hold true at the current time. There has been some rewording of Policy GO2: Protecting open spaces on Council Estates in light of consultation responses received from Camden; however, it remains the case that the policy performs well. Notably, the policy references the need to work with residents and communities to develop a vision for the area and to ensure a balance of the potential benefits for estates' residents, and open space considerations (quality and quantity). The latter considerations may also relate to biodiversity.

17 CLIMATE CHANGE MITIGATION (NON-TRANSPORT RELATED)

17.1 Relevant sustainability objectives

- Objective 8: Promote designs that facilitate efficient use of energy and support the generation and use of renewable and low carbon energy.
- Objective 9: Reduce the amount of waste requiring final disposal, including waste associated with the development process.

17.2 Assessment of policies

- 17.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 17.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 17.1: Summary of policy specific assessment text from the previous version of the Environmental Report

The plan promotes climate change mitigation measures through policy focused on the creation of pedestrian and cycle links, and also policy for mixed use redevelopment within the Kentish Town Potential Development Area, which seeks to ensure that buildings minimize carbon emissions.

17.3 Conclusions

- 17.3.1 The March 2015 Environmental Report concluded that -
- The NP policies make appropriate provision for climate change, both in terms of limiting greenhouse gas emission and adapting to the effects of climate change.
- 17.3.2 These conclusions hold true at the current time. Significant changes have been made in relation to the Kentish Town Potential Development Area, but it remains the case that the following policy criteria is set to be implemented: *"Buildings and services will be expected to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation (which can include sources of site-related decentralised renewable energy) as stated in Camden policies DP22 and in accordance with CS13."*

18 COMMUNITY AND WELL-BEING

18.1 Relevant sustainability objectives

- Objective 10: Promote healthy living
- Objective 11: Help reduce levels of crime and fear of crime
- Objective 12: Ensure access to facilities and quality open space
- Objective 13: Tackle poverty and social exclusion
- Objective 14: Encourage development that facilitates social cohesion
- Objective 16: Promote access to employment opportunities for local people
- Objective 17: Protect existing and provide for new education facilities to meet needs

18.2 Assessment of policies

- 18.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 17.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 17.1: Summary of policy specific assessment text from the previous version of the Environmental Report

The shopping and working policies aim to promote vibrant and viable shopping and business centres in Kentish Town, which in turn will support a number of the community and well-being objectives. A number of the policies also relate to improvements to public and open spaces, including policy supporting the potential decking of the railway line around Kentish Town station. This is likely to lead to particular benefits, given shortages of green and open spaces in the KTNP area.

A policy likely to lead to particular community and wellbeing benefits is that which seeks to prioritise the implementation of step-free access to rail and underground stations in the KTNF area. This would have a positive effect on public transport accessibility for mobility impaired passengers.

Policy seeks to limit change of use of public houses, with 12 specific public houses within the KTNP area proposed to be designated as 'assets of community value'. This is important given that public houses serve as important community and social spaces. Similarly, policy seeks to from change of use of a number of stores within the KTNP area.

Policy supporting redevelopment within the Kentish Town industrial area has the potential to support wide-ranging community objectives, although there are also possible drawbacks to consider given the likelihood of the type of employment opportunities available changing, possibly leading to some risk of unemployment.

Other site specific policies will also have a positive effect through redeveloping existing underutilised sites and providing much needed residential and employment space in the KTNP area. Notably, policy aims to reinstate the building at 2 Prince of Wales Road as a public building for leisure/entertainment. This is a 'positive'; however, there is a possible draw-back in that existing community uses will need to relocate. It is recommended that the policy be amended to provide support for the re-locating the Camden Community Law Centre and the Citizens Advice Bureau so that these services are not lost from the KTNP area.

18.3 Conclusions

- 18.3.1 The March 2015 Environmental Report concluded that -
- Notwithstanding the recommendations made, overall the KTNP is considered to have a significant positive effect in terms of community and well-being objectives.
- 18.3.2 These conclusions hold true at the current time. Indeed, it is likely that changes made to the plan are supportive of community and well-being objectives, in particular changes made to ensure sensitive redevelopment within the Kentish Town Potential Development Area. Examining the latest version of this important policy, it can be seen that the policy addresses provision of new educational institutions and healthcare facilities.

19 ECONOMY

19.1 Relevant sustainability objectives

- Objective 19: Support development in existing centres and the health of town centres
- Objective 20: Retain and support existing, locally based industries and businesses
- Objective 21: Accommodate new and expanding businesses
- Objective 22: Encourage new investment in the local economy

19.2 Assessment of policies

- 19.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 19.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 19.1: Summary of policy specific assessment text from the previous version of the Environmental Report

Promoting the retention of existing employment land and the development of new employment land (generally as part of mixed use schemes promoted by numerous site-specific policies) would assist in contributing towards economic objectives. It is considered that within the scope and context of the KTNP area, the proposed site-specific policies would lead to significant positive effects in terms of the economy by promoting significant regeneration of the KTNP area.

It is acknowledged that the promotion of mixed-use regeneration of the Kentish Town industrial area is likely to result in the displacement of some existing industrial land uses. This is the last dedicated area of light industrial land and warehousing in Camden. In the draft Camden Local Plan, the Regis Road part of the Kentish Town Industry Area is designated "for comprehensive mixed use development, including significantly increased employment opportunities and new homes". The draft plan also states they will protect existing business premises (offices as well as industry and warehousing) unless redevelopment can better meet economic and employment objectives and other priorities, for example housing/affordable homes.

19.3 Conclusions

- 19.3.1 The March 2015 Environmental Report concluded that -

Overall, the NP is likely to have a significant positive effect on 'the economy'

- 19.3.2 These conclusions hold true at the current time. Indeed, it is likely that changes made to the plan are supportive of 'economy' objectives, in particular changes made to ensure sensitive redevelopment within the Kentish Town Potential Development Area. It is understood that changes to this policy have been made in light of consultation responses received from Camden Borough Council and the Greater London Authority (GLA), both of whom have an interest in maintaining a balanced supply of employment land at the larger-than-local scale. GLA has a particular interest in maintaining support for the London Central Activities Zone (CAZ), and has identified the operations of the following businesses, within Kentish Town, as being important in this respect: UPS - just-in-time mail delivery and postal services to London markets; Royal Mail - sorting office and vehicle pound; Fairfax Meadow – meat supply and distribution to the food and accommodation sector inc. restaurants and hotels; EKO – bike delivery hub for courier services.

- 19.3.3 Since March 2015 some further evidence/understanding has emerged regarding the businesses operating on-site (although there remains more to understand, concerning individual occupants on the Estate, e.g. business supply chain relationships, the location of end markets, operational flexibilities and staff 'travel to work' patterns). Notably, it has been established that 'decanting' and relocating businesses occupying large floorplates and requiring extensive areas of land for vehicle circulation and storage will be a challenge. However, equally evidence of congestion close to the estate during peak periods suggests there may be opportunities to find better premises and sites for some of the businesses.

20 HERITAGE

20.1 Relevant sustainability objectives

- Objective 24: Promote high quality and sustainable urban design which protects and enhances the historic environment
- Objective 25: Ensure enhancement of the public realm and local distinctiveness, taking into consideration the characteristics of the existing townscape and strategic views
- Objective 26: Ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value

20.2 Assessment of policies

- 20.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 20.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 20.1: Summary of policy specific assessment text from the previous version of the Environmental Report

There are four conservation areas within the plan area, namely the Bartholomew Estate, Inkerman, Kelly Street and Kentish Town conservation areas. A small section of the Dartmouth Park Conservation Area bisects the northern edge of the plan area, while the southern boundary of the plan area is shared with Jeffrey's Street Conservation Area and Rochester Conservation Area. None of these conservation areas intersect with the Kentish Town Potential Development Area, which is the area likely to see the greatest change as a result of the plan.

Policy provides general principles for innovative building design in the KTNP area. The proposed policy covers a wide range of design considerations, with design cues including building form (shape), scale, height and massing, alignment, modulation, architectural detailing, materials. Although the proposed policy does not explicitly cover heritage values, it is expected that implementation of the policy would mean that heritage values would be taken into account where they were a relevant consideration. This notwithstanding, it is recommended that consideration is given to amending the policy to provide for a more explicit consideration of heritage values as part of the overall design process.

Policy provides for protection of buildings and features of architectural merit that are not currently listed or protected under Camden Council's planning policies. Development with the potential to impact these non-designated heritage assets will be required to be of a high standard and respond to local character.

20.3 Conclusions

- 20.3.1 The March 2015 Environmental Report concluded that -
- Notwithstanding the recommendation made, overall it is considered that the KTNP would have a positive effect on heritage in the KTNP area.
- 20.3.2 These conclusions hold true at the current time, although it is recognised that the policy approach to the Kentish Town Potential Development Area is now less prescriptive, in particular in respect of building heights.

21 HOUSING

21.1 Relevant sustainability objectives

- Objective 27: Promote the provision of a range of high quality and affordable housing to meet local needs
- Objective 28: Increase the net supply of housing, including affordable housing
- Objective 29: Provide housing for people, particularly families, on low to moderate incomes
- Objective 30: Encourage development at an appropriate density, standard, size and mix

21.2 Assessment of policies

- 21.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 21.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 21.1: Summary of policy specific assessment text from the previous version of the Environmental Report

Policy supporting mixed use redevelopment within the Kentish Town Potential Development Area is set to support the achievement of targeted housing objectives, and policies for redevelopment of other sites will also contribute. Camden Core Strategy requirements for affordable housing are widely signposted.

21.3 Conclusions

- 21.3.1 The March 2015 Environmental Report concluded that -

Overall, the KTNP is considered to have a significant positive effect in terms of housing.

- 21.3.2 These conclusions hold true at the current time. Examining the latest version of the important policy on the Kentish Town Potential Development Area, it can be seen that the policy requires provision of affordable housing in accordance with the London Plan Policy 3.10 and Camden's policy DP3; and housing for the growing population of the elderly is included in the proposed development in accordance with Camden policy DP7.

22 LANDSCAPE / TOWNSCAPE

22.1 Relevant sustainability objectives

- Objective 31: Encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair.
- Objective 32: Ensure efficient use of land through maximising densities where appropriate.

22.2 Assessment of policies

- 22.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 22.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 22.1: Summary of policy specific assessment text from the previous version of the Environmental Report

Policies aim to promote vibrant and viable shopping and business centres in Kentish Town by limiting non-retail frontages, and a secondary effect should be a higher quality townscape along Kentish Town Road.

Policy seeks to protect the strategic view to Parliament Hill from outside Kentish Town station, and also sets principles for innovative building design in the KTNP area. The design policy covers a wide range of considerations, discussing design cues including building form (shape), scale, height and massing, alignment, modulation, architectural detailing, materials".

Policy supports the designation of existing public open spaces as 'local green spaces' and protects these spaces from development, whilst another deals with green and open spaces on council estates. A number of the site-specific policies are also relevant to landscape/townscape, in particular that which supports creating a town square for the area outside Kentish Town station. Given that the area currently lacks a focal point, the creation of such a town square should have a significant positive effect on the public realm.

Sites within the Kentish Town Potential Development Area are currently underutilised and the proposed policies would promote mixed use, residential-led development with associated employment (office) space. There are sensitive views over the Murphy site, between Kentish Town station and Parliament Hill; however, there is an expectation that impacts can be avoided.

Other site-specific policies, and also the policy promoting infill development in appropriate sites throughout the KTNP area, should also have positive effects in terms of townscape overall (recognizing that there will be site specific issues to be addressed at the planning applications stage).

22.3 Conclusions

- 22.3.1 The March 2015 Environmental Report concluded that -

Overall, the KTNP is considered to have a significant positive effect in terms of landscape/townscape.

- 22.3.2 These conclusions hold true at the current time. Examining the latest version of the important policy on the Kentish Town Potential Development Area, it can be seen that the policy requires green spaces, play spaces, leisure facilities and fully accessible public squares in accordance with Camden policies DP31 and CS15, and 'improvements to the environment of the area, including upgrading existing premises and creating modern employment space'. The policy is, however, less prescriptive than the March 2015 version in some respects, most notably in relation to building heights.

23 TRANSPORT

23.1 Relevant sustainability objectives

- Objective 33: Reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area
- Objective 34: Encourage development at locations that enable walking, cycling and/or the use of public transport
- Objective 35: Enhance permeability and encourage the provision of infrastructure for walking, cycling and/or the provision of public transport
- Objective 36: Encourage an increase in car free and car capped housing
- Objective 37: Guide significant travel generating developments towards areas with high public transport accessibility
- Objective 38: Locate significant travel-demand generating uses, including new housing, in areas with high public transport accessibility and local services.

23.2 Assessment of policies

- 23.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 23.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 23.1: Summary of policy specific assessment text from the previous version of the Environmental Report

Given the very high PTAL of the KTNP area, development increasing the potential for people to live and work in the area is to be supported, and on this basis proposals for the Kentish Town Potential Redevelopment Area are particularly supported. Policy support for improving walking/cycling 'permeability' is also noted.

23.3 Conclusions

- 23.3.1 The March 2015 Environmental Report concluded that -
- Overall, the NP is considered to have a significant positive effect in terms of transport.
- 23.3.2 These conclusions hold true at the current time. Examining the latest version of the important policy on the Kentish Town Potential Development Area, it can be seen that the policy requires west-east access routes for footpaths and cycle ways linking the site with Arctic Street and Spring Place in the west and Kentish Town Road in the east; and states that: *"Apart from parking for essential users (e.g. emergency services) and Blue Badge permit holders, any development will be car free."*

24 WATER, FLOOD RISK AND OTHER CLIMATE CHANGE ADAPTATION ISSUES

24.1 Relevant sustainability objectives

- Objective 39: Protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change.
- Objective 40: Promote the sustainable use of water resources.
- Objective 41: Require development that incorporates sustainable drainage.
- Objective 42: Help to reduce the risk of flooding and increase flood resilience, including surface water flooding.

24.2 Assessment of policies

- 24.2.1 There has not been a re-examination of the detailed policies presented within the current, submission version of the plan document. Box 24.1 presents text from the previous version of the Environmental Report, which relates to the previous ('pre-submission') version of the plan.

Box 24.1: Summary of policy specific assessment text from the previous version of the Environmental Report

The main flood risk present in the KTNP area is the risk of surface water flooding towards the north-west of the area around Gospel Oak, and this is potentially relevant to the Kentish Town Potential Redevelopment Area. It is also the case that all development should aim to reduce and manage surface water runoff, an issue that is addressed by Camden Local Plan Policy CC3.

24.3 Conclusions

- 24.3.1 The March 2015 Environmental Report concluded that -
- Overall, the NP is not considered to have any effect in terms of water, flood risk and climate change adaptation.
- 24.3.2 These conclusions hold true at the current time.

PART 4

WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

25 INTRODUCTION TO PART 4

The Environmental Report must include...

- Measures envisaged concerning monitoring

This part of the report has been updated, since the Environmental Report was last published in March 2015.

- 25.1.1 This Part of the report explains next steps (i.e. steps subsequent to submission of the Proposed Plan in-line with Regulation 15 of the Neighbourhood Planning Regulations) that will be taken as part of plan-making / SEA.

26 PLAN FINALISATION AND ADOPTION

- 26.1.1 **Regulation 17** requires that the Local Authority submits (to the person appointed to carry out the Examination) the Proposed Plan and a copy of any representations which have been made on the Submission Draft Plan (and this Environmental Report Update). It may be appropriate for the Local Authority to also submit this Environmental Report Update, with a view to informing the Examination.

- 26.1.2 **Regulations 18 and 19** require that, subsequent to the Examination, the Local Authority publishes the Examiner's Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to 'make' (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated Environmental Report, with a view to informing the Referendum.

- 26.1.3 **Regulation 20** states what the Local Authority must do when the plan is 'made' (i.e. adopted). The SEA Statement must be published alongside the made Plan. The SEA Statement must present:

- information on the decision, i.e. must explain why the final plan approach was decided-upon in light of SEA and consultation; and
- measures decided concerning monitoring.

27 MONITORING

- 27.1.1 At the current stage – i.e. in the Environmental Report - there is a need to present 'a description of the measures envisaged concerning monitoring'.

- 27.1.2 In light of the assessment findings presented in Part 3 of this report, it will be important that monitoring efforts are focused on implementation of redevelopment within the Kentish Town Industrial Area, including monitoring of employment space and employers.

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.

Schedule 2	Interpretation		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>	i.e. answer – <i>What's the scope of the SA?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i>	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)		
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan		
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i>	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i>	

APPENDIX II – THE CAMDEN SEA/SA FRAMEWORK

The following table presents the ‘framework’ presented within the Euston AAP SA Scoping Report (2012). This framework is an updated version of that established for the Core Strategy in 2008.

NO.	OBJECTIVE	CRITERIA	POTENTIAL INDICATOR(S)
Social / economic			
1	To promote the provision of a range of high quality and affordable housing to meet local needs	a) Will the Area Plan increase the net supply of housing, including affordable housing? b) Will the Area Plan protect and promote affordable housing development? c) Will the Area Plan provide housing for people, particularly families, on low to moderate incomes? d) Will the Area Plan encourage development at an appropriate density, standard, size and mix?	• Additional home provision, new home completions • Annual average number of net additional dwellings needed to meet overall housing requirements • Compliance with regional housing minimum targets • Compliance with Housing Density • % Housing built on previously developed land • Housing Stock by Tenure • Number of affordable housing completions • Average House Prices and Council tax Banding • Ratio of average house price to gross household income • Number of wheelchair accessible properties • Number of new developments meeting Lifetime Homes • Number of homeless households • Condition of housing stock: Unfit dwellings by tenure • Number of overcrowded households • Household size: No of people living in property • % of housing in mixed use schemes • Housing/dwelling type • Household composition • Ratio of average house price to gross household income • Additional home provision, new home completions
2	To promote a healthy and safe community	a) Will the Area Plan protect and enhance the provision of healthcare and other emergency services facilities in the area? b) Will the Area Plan promote healthy living through e.g. provision of walking, cycling and recreation facilities? c) Will the Area Plan help reduce levels of crime and fear of crime?	• % people who describe their health as good/not good • Number of population with limiting long-term illnesses • Access to a GP per 1000 population • Floorspace of community facilities/services lost/ retained/ gained • Access to public open space • Number of sports/playing fields and outdoor recreation spaces

NO.	OBJECTIVE	CRITERIA	POTENTIAL INDICATOR(S)
			- Recorded crime per 1,000 population for burglaries, criminal damage, drug offences, robbery and violence against a person. - Percentage of residents surveyed who feel 'fairly safe' or 'very safe' after dark whilst outside their local area % developments incorporating secure by design principles(No record available) % Reduction in the number of people killed or seriously injured in road accidents - Number of sites with potential land contamination issues
3	To ensure access to local shopping, community, and leisure facilities and access to and enhancement of open space	a) Will the Area Plan encourage mixed-use development? b) Will the Area Plan encourage the retention and development of key services? c) Will the Area Plan encourage the location of services in proximity to public transport? d) Will the Area Plan help to increase access to and improve overall open space provision, including children's play space?	- Total number of mixed use developments completed - Distribution of local services across the borough - Floorspace of community facilities/services lost/retained/gained - Town Centre Health Check % Ground Floor Vacant Floor-space in primary Shopping Frontages (London frontages and neighbourhood centres - Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres (over 4 years) - Access to public open space - Amount of children's play space available - Open spaces lost/ gained/ improved - Open space deficiency
4	To tackle poverty and social exclusion	a) Will the Area Plan encourage development that facilitates social cohesion? b) Will the Area Plan provide for equality of access for all to facilities, buildings and services? c) Will the Area Plan encourage development opportunities in those areas in need of economic development?	- Number of Super Output Areas within 10% and 20% most deprived in England. - Unemployment rate by ward - Deprivation by ward - Number of existing homes with improved SAP rating % of public buildings fully accessible %/ No. of housing units designed to wheelchair accessibility - Number of dwellings meeting Lifetime Homes standards - Number of wheelchair accessible

NO.	OBJECTIVE	CRITERIA	POTENTIAL INDICATOR(S)
			housing in social housing sector • Number of Hostels and Care Homes • Town Centre Health Check • % Ground Floor Vacant Floor-space in primary Shopping Frontages (London frontages and neighbourhood centres) • Changes in Vacant Employment Land
5	To encourage and accommodate sustainable economic growth and employment opportunity	a) Will the Area Plan encourage the retention and growth of existing, locally based industries? b) Will the Area Plan accommodate new and expanding businesses? c) Will the Area Plan encourage new investment in the local economy and promote development opportunities for employment? d) Will the Area Plan focus growth on Core Strategy retail growth areas and designated frontages within the retail hierarchy?	• Employment floorspace lost/retained/created • Composition of businesses operating in Camden • Changes in vacant employment land • Net changes in use classes by floorspace • Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres) • Completed retail and financial services and offices floorspace • Economic activity of the population of Camden • Occupation of those currently in employment by industry • Unemployment by Ward • Long-term unemployment (% of unemployed who have been out of work for over one year) • Claimant count unemployment rate
6	To maximise the benefits of regeneration and development to promote sustainable communities	a) Will the Area Plan encourage sustainable inward investment that will promote social well-being and benefit the economy? b) Will the Area Plan promote access to employment opportunities for local people? c) Will the Area Plan protect existing and provide for new education facilities to meet needs, both for existing and new residents?	• Employment floorspace lost/retained/created • % Unemployment levels • Nos. of local people employed • Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres (over 4 years) • % of new housing on previously developed land • Economic Activity of population • Occupation of those currently in employment • Unemployment by Ward • Long-term unemployment (% of unemployed who have been out of work for over one year) • Claimant count unemployment rate

NO.	OBJECTIVE	CRITERIA	POTENTIAL INDICATOR(S)
			Area of new education facilities created
Environmental			
7	To promote high quality and sustainable urban design which protects and enhances the historic environment	a) Will the Area Plan provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape and strategic views? b) Will the Area Plan ensure enhancement of the public realm and local distinctiveness? c) Will the Area Plan ensure protection and enhancement of the historic significance of heritage assets and their settings and the wider historic environment? d) Will the Area Plan encourage the use of sustainable design and construction?	% of new housing on previously developed land - Compliance/Comparison with GLA London Plan Density matrix - No. of Conservation Areas designated - No. of Listed Buildings at Risk - No. of Scheduled Ancient Monuments - Impact on potential archaeological deposits - No. of Tree Preservation Orders (TPOs) served - No. of new developments with Code for Sustainable Homes levels 4-6 or BREEAM assessments scores of Very Good or Excellent % new developments using sustainable construction
8	To ensure new development makes efficient use of land, buildings and infrastructure.	a) Will the Area Plan encourage the reuse or improvement of buildings and land, that are vacant, under-utilised or in disrepair? b) Will the Area Plan ensure efficient use of land through maximising densities where appropriate?	% of new housing on previously developed land - Compliance/Comparison with GLA London Plan Density matrix % of vacant buildings
9	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	a) Will the Area Plan encourage development at locations that enable walking, cycling and/or the use of public transport? b) Will the Area Plan encourage the provision of infrastructure for walking, cycling and/or the provision of public transport? c) Will the Area Plan encourage access for all to public transport? d) Will the Area Plan encourage an increase in car free and car capped housing? e) Will the Area Plan enhance permeability of the area for access by non-motorised forms of transport?	% increase in bus passenger journeys % reduction in number of people killed or seriously injured in road accidents. % reduction in motor traffic flows through the borough % increase in cycling as a share of the modal split - location of major transport demand generating developments - car-free and car-capped housing as percentage of new housing - distribution of local services throughout the borough
10	To improve amenity by	a) Will the Area Plan	Nos. of complaints about noise

NO.	OBJECTIVE	CRITERIA	POTENTIAL INDICATOR(S)
	minimising the impacts associated with noise	ensure that noise from existing and new developments and operations will not affect new or existing noise sensitive development or land uses? b) Will the Area Plan ensure new noise sensitive uses are not located near existing established noise generating uses?	• % increase/decrease in ambient noise levels
11	To protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change	a) Will the Area Plan promote the sustainable use of water resources? b) Will the Area Plan encourage development that incorporates sustainable drainage? c) Will the Area Plan help to reduce the risk of flooding and increase flood resilience?	• <u>% of new developments incorporating sustainable drainage measures</u> • <u>% new developments incorporating water conservation measures (e.g. rainwater harvesting and greywater recycling)</u> • Number of properties at risk from 5% and 1.3% surface water flood events • No. of planning permissions granted contrary to advice from the Environment Agency on flooding or water quality • Annual domestic water consumption by type (a) potable; and (b) other
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	a) Will the Area Plan protect and enhance natural habitats in the area, particularly those of priority species? b) Will the Area Plan provide for the protection of biodiversity and open space in the area? c) Will the Area Plan encourage the creation of new habitats, including through the provision of additional open space and green roofs? d) Will the Area Plan protect and provide for the planting of more trees in the area?	• Change in priority species (by type) • Change in priority habitats (by type) • Net loss/gain of Sites of Nature Conservation Importance (SNCIs) and designated open spaces • Open space deficiency • No. of tree preservation orders served • No. of applications affecting trees protected by TPOs • No. of applications permitted that involved the loss of trees protected by TPOs • No. of new developments incorporating green roofs, landscaping or open space to improve biodiversity
13	To reduce the amount of waste requiring final disposal	a) Will the Area Plan ensure reduction of waste during the development process and/or operation? b) Does the Area Plan	• % new developments using sustainable construction • % of households recycling • % of total waste recycled and composted

NO.	OBJECTIVE	CRITERIA	POTENTIAL INDICATOR(S)
		encourage the movement of waste up the hierarchy?	• Annual household waste per head of population (tonnes) • % of household waste recycled
14	To improve air quality	a) Will the Area Plan reduce CO ₂ and other greenhouse gas concentrations in the atmosphere? b) Will the Area Plan reduce the discharge of particulate matter to the atmosphere? c) Will the Area Plan contribute to an improvement of air quality?	• Number of days when air pollution exceeds limits • Carbon dioxide (CO₂), Nitrogen dioxide (NO₂) and particulate matter (PM₁₀) emissions • Reduction in traffic flows along roads in the borough • Increase in walking • Increase in cycling • Increase in public transport journeys
15	To provide for the efficient use of energy in order to mitigate and adapt to the potential impacts of climate change	a) Will the Area Plan encourage the generation and use of renewable and low carbon energy? b) Will the Area Plan promote designs that facilitate efficient use of energy both to mitigate against and adapt to the potential impacts of climate change.	• Proportion of energy generated from renewable sources • Number of new developments achieving Code for Sustainable Homes level 4-6 or BREEAM ratings of very good or excellent • Number of existing homes retrofitting to improved energy efficiency standards • Domestic energy efficiency • Annual average domestic energy consumption of (a) natural gas; (b) electricity • No. of planning applications accompanied by a BREEAM/ Code for Sustainable Homes assessment
16	To minimise the use of fossil fuels, aggregates and non-renewable resources.	a) Will the Area Plan encourage more efficient supply and use of natural resources? b) Will the Area Plan encourage sustainable design and construction? c) Will the Area Plan encourage the use of alternative modes of transport to the private car?	• Number of new developments achieving Eco-homes or BREEAM ratings of very good or excellent • Proportion of energy generated from renewable sources • %/No. of new developments incorporating water conservation measures e.g. SUDS • No. of planning applications accompanied by BREEAM or EcoHomes assessments • % new developments using sustainable construction • Increase in walking • Increase in cycling • Increase in bus passenger journeys • Car-free and car-capped housing

APPENDIX III - KENTISH TOWN POTENTIAL DEVELOPMENT AREA: ALTERNATIVES

This appendix presents detailed assessment findings in relation to the Kentish Town Industrial Area alternatives that are a focus of discussion in Part 2 of this report.

Only minor changes have been made to the appraisal findings, since last published in March 2015

Assessment methodology

The alternatives assessment methodology is described in detail in Chapter 11, above. To reiterate, within each row (i.e. for each topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using red / green shading) and also **rank** the alternatives in order of preference.

Detailed assessment findings

Kentish Town Potential Development Area: Alternatives assessment findings

(1) Low density (in terms of housing) mixed-use development of the site (2) High density (in terms of housing) mixed-use development of the site			
Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
Air quality and noise	Air quality is not likely to be a concern, on the assumption that any redevelopment scheme would be largely 'car free' (which is entirely feasible given the excellent public transport connections). Noise and amenity is an important consideration. Assuming that any redevelopment scheme would seek to retain an element of light industry, there are obviously risks in that some light industrial operations can be 'bad neighbour' uses. There will be good potential to mitigate risks through masterplanning, design and possibly imposing conditions on light industrial operations (e.g. around times of activity), but this could be more of a challenge under Option 2. It is not possible to conclude significant negative effects given that a robust policy framework is in place (see Chapter 6 of Camden's Draft Local Plan 2015, which deals with 'protecting amenity') that will ensure effects are avoided / mitigated.	★1	2
Biodiversity	There are notable biodiversity considerations given the green corridor – designated as a borough 1 SINC – associated with the embankment of the railway running through the middle of the industrial area. As can be seen from Figure 7.2 within the baseline review section of this report, the land in question forms part of a more extensive green corridor 'network' that is significant at the borough scale. It is difficult to envisage a situation whereby development can directly support enhancement of the embankment's biodiversity value; however, there might be some potential for small scale habitat creation as part of a redevelopment scheme that supports the functioning of the green corridor. It is also noted that there might be the potential for 'decking over' the railway at some time in the future. It seems fair to assume that this would be more likely (i.e. financially viable)	★1	2

Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
	under a high density scheme. In conclusion, Option 2 is judged to be the less preferable option. It is not possible to conclude significant negative effects given that there can be no certainty regarding decking over the railway.		
Climate change mitigation (non-transport related)	A comprehensive mixed-use redevelopment scheme will lead to clear opportunities to design-in innovative low carbon 'energy solutions'. There will certainly be the potential for a combined heat and power station / district heating scheme. As explained within Chapter 8 ('Sustainability and Climate Change') of Camden's Draft Local Plan 2015, existing decentralised energy networks operate in Kings Cross, Bloomsbury and Gospel Oak. The Council has undertaken work to identify opportunity areas within the borough, which does not flag particular opportunities associated with Kentish Town Potential Development Area (although it is noted that there is a concentration of communally heated developments in the Gospel Oak / Maitland Park area, which could benefit). However, para 8.23 is clear that: <i>"New developments are considered to be the most effective catalysts for decentralised energy network growth. The Council will therefore require all new major developments to assess the feasibility of establishing new or connecting to existing or planned decentralised energy networks."</i> It is also stated that – <i>"The Council does not support the installation of stand-alone CHP units in small residential developments where there is neither the potential nor the intention for that development to form part of a wider network."</i> – but it is assumed that this would not apply to a comprehensive redevelopment of Kentish Potential Development Area. Innovative and ambitious schemes become more financially viable when a development is of a large scale (which in this case would mean higher density). As such, Option 2 is preferred; however, it is noted that Combined Heat and Power plants do create localised air pollution, which weighs in favour of a lower density scheme. It is appropriate to conclude that either option could lead to significant positive effects in the long term. Within Camden, efforts are currently focused to the south (Kings Cross etc.) and there are also identified opportunities at West Hampstead. A scheme at Kentish Town would be an important piece in the jigsaw.	2	★
Community and well-being	Leaving aside the matter of housing (which is dealt with separately below) a comprehensive redevelopment scheme could help to support the achievement of a number of community related objectives. The land is currently not highly valued by many who live locally, given that there is poor permeability through the site and the quality of the environment is relatively poor. The potential to walk and cycle through an attractive and vibrant mixed use development will be valued by the local community, and enhanced potential for	★	★

Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
	residents of Maitland Park / Gospel Oak to access Kentish Town Road is a notable positive given that these residential areas suffer from a degree of relative deprivation (see Figure 7.4 within the baseline review section of this report). Redevelopment should also help to enhance the vibrancy of Kentish Town Road. It is not clear that a redevelopment will directly support efforts to remodel and reinvigorate the Kentish Town Square area, but increased footfall around the northern end of the high street should help to ensure the viability of primary and secondary shopping frontages. It is also the case that a range of different types of employment space will be delivered as part of a comprehensive redevelopment, which in turn ensure that Kentish Town attracts a diverse community. It is also a priority of Camden Council to attract growth industries, Small and Medium Size Enterprises (SMEs) and start-ups. However, there is a need to consider whether some types of light industry will be displaced, leaving some local residents (whose skill set is not easily transferred to other types of employment) at risk of unemployment (see further discussion below, under 'Economy'). With regards to access to services/facilities, it is not thought that there are notable capacity issues that will be worsened by a redevelopment scheme, given that it will be possible to require contributions towards new or enhanced provision. There may be the possibility to address some local existing deficiencies (e.g. in terms of green spaces) but this is uncertain. In conclusion, it is difficult to differentiate between the alternatives. There will be a need for further detailed work that considers the merits of different density options in terms of a range of detailed criteria. There will inevitably be a balance to be struck. There is the strong potential for significant positive effects; however, it is not appropriate to conclude significant positive effects at this stage given that there is a notable uncertainty with regards to the impact that a loss of light industrial employment opportunity might have on particular sectors of the community.		
Economy	The Kentish Potential Development Area comprises the Regis Road site and the Murphy site. The Regis Road site is home to a variety of different businesses, but can possibly be classed as underused. The Murphy site is occupied by three storey offices, sheds, yards, and a depot for a construction and civil engineering company. It is important to be clear that whilst the Neighbourhood Plan is supportive of redevelopment across both sites, the Draft Camden Local Plan 2015 supports redevelopment of the Regis Road site only. Mixed use redevelopment of underused light industrial land is supported by London Plan policy (where there are good transport links) given the acute need for housing (which can	?	?

Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
	be considered an economic consideration) and also because there is the potential to deliver new employment space that is suitable for growth sectors. However, concerns have been raised regarding the cumulative effect of losing numerous sites across the capital (and within particular parts of the capital) – see discussion in Box 6.1 within the Context Review section of this report. It is noted that there are few concentrations of industrial and warehousing uses left within Camden, and the Kentish Town Industrial Area is the only area of land in the borough to have a mix of such uses and no housing. It is also noted that Camden has strong trading links with London's Central Activities Zone (CAZ) and the borough's industrial and warehousing businesses provide it with a range of vital goods and support services. It is recognised that there is a counter argument - namely a suggestion that in some cases relocation provides a chance for a business to renew outmoded plant and acquire more modern or larger premises if it wishes to do so - but on balance it is appropriate to highlight the potential for 'negative' effects. In conclusion, whilst Option 2 (high density) would maximise the potential to deliver employment space for a range of important growth sectors, including spaces for small and medium size enterprises (SMEs), it would likely compromise the potential to retain the light industrial role of the site, unless the impacts on existing businesses are carefully managed. As such, it is appropriate to conclude uncertain effects.		
Heritage	It is not thought that there are particular heritage concerns (other than those associated with long distance views, discussed below under the 'Landscape' heading), and it might be suggested that redevelopment of the Kentish Town Potential Development Area is a positive in that it reduces the pressure for development within parts of the local area that are more sensitive (i.e. which contain designated assets).	★1	★1
Housing	Significant positive effects are predicted for both options, with a high density development preferable as it will lead to good potential to deliver a high proportion of affordable housing, as well as specialist housing (e.g. for the elderly).	2	★1
Landscape / townscape	The site is currently generally only occupied by single or double storey sheds, open air yards, parking and the access road. Future buildings would reflect the density and scale of an inner London location, and hence higher buildings can be expected. In general terms higher density development would lead to a greater change in landscape and townscape terms from the current bulk and form of the existing buildings on these sites. For this reason, lower density development (Option 1) is the preferred option from the landscape/townscape perspective. That said, both options have the potential to have positive and negative effects on landscape/townscape and the density of development is only one aspect of this. Development form and quality will generally have a greater influence of	★1	2

Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
	landscape/townscape effects than density.		
Transport	In general terms higher density developments make public transport more viable. For this reason, Option 2 is preferred over Option 1. It is acknowledged, however, that given the existing high levels of public transport accessibility for the Regis Road and Murphy site areas this is unlikely to be a major consideration. Both options would allow for provision of walking and cycling infrastructure. At this level it is not possible to conclude that positive effects given that loss of light industry is likely to lead to increased need to move goods long distances on the highway network.	2	★1
Water, flood risk and other climate change issues	The north of the Murphy site, which is within the Dartmouth Park Neighbourhood Forum Area, is adjacent to the Local Flood Risk Zone of Gospel Oak. In general terms higher density development would be expected to contain less green and permeable space than lower density development. For this reason, Option 1 performs better than Option 2. It is acknowledged that for development at any density mitigation is likely to be provided for surface water flooding in the form of sustainable urban drainage systems (SuDS).	★1	2
Summary A high density redevelopment would lead to the potential to maximise positive effects in terms of ‘housing’ objectives (i.e. there will be good potential to deliver affordable and specialist housing) and also climate change objectives (i.e. there will be good potential to deliver decentralised energy solutions). It may also be that it is preferable from a ‘community and well-being’ perspective; however, there are some uncertainties. A notable uncertainty is highlighted in terms of the ‘economic’ effects of a high density redevelopment. On the one hand it is a positive as it will be possible to increase the number of jobs on site and support a range of important growth sectors; but on the other hand there are concerns regarding the long term effect of losing light industrial space (given a London-wide trend towards high density mixed use redevelopment of light industrial land). Whilst there will be the potential to retain light industrial space as part of a mixed use redevelopment, this will obviously be constrained to some extent by housing under a high density scheme. With regards to biodiversity and landscape considerations it is possible to conclude with more certainty that a high density scheme could lead to problems; however, there is still considerable uncertainty. Landscape issues (i.e. views across the site) are a priority consideration, but it is not clear that there is risk of any significant impacts. With regards to biodiversity, it will be important that the green corridor running through the site (along the railway embankment) is taken into consideration as part of future work to explore options.			

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