

Sustainability Appraisal (SA) of the Camden Local Plan

Interim SA Report
Non-technical Summary

January 2024



Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Camden Local Plan, which is being prepared by London Borough of Camden. Once adopted, the Local Plan will establish a strategy for growth and change up to 2041, allocate sites to deliver the strategy and set policies used to determine planning applications.

SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Central to the SA process is the preparation of an SA Report for publication alongside the draft plan, with a view to informing the consultation and subsequent plan finalisation.

At the current time an 'Interim' SA Report is published alongside a first draft version of the Local Plan (see discussion of next steps below).

This is the Non-Technical Summary (NTS) of the Interim SA Report.

Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has the SA process involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by considering the SA 'scope'.

What's the scope of the SA?

The scope of the SA is reflected in a list of topics, objectives and key issues/opportunities. Taken together, this list indicates the parameters of SA, providing a methodological 'framework' for assessment.

The topics at the core of the SA framework are as follows:

- Homes
- Health
- Equality
- Amenity
- Open space
- Biodiversity
- Air quality
- Energy and resources
- Water
- Resilience
- Design
- Historic environment
- Land
- Economy and employment
- Centres

The SA process up to this point

A key element of the required SA process involves assessing 'reasonable alternatives' in time to inform the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

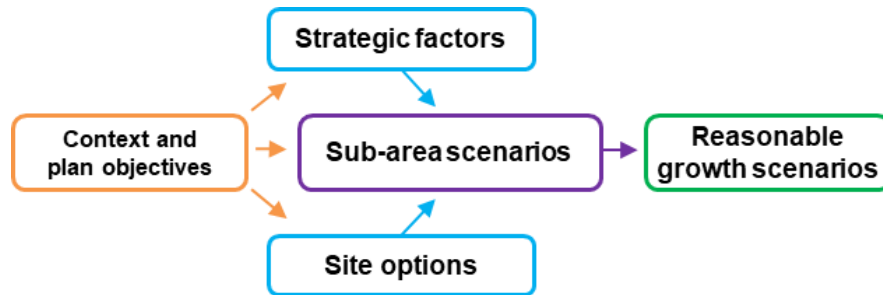
As such, Part 1 of the main report explains work undertaken to develop and appraise a 'reasonable' range of alternative approaches to the allocation of land for development, or '**growth scenarios**'.

Specifically, Part 1 of the report presents:

- 1) work to **define** the growth scenarios;
- 2) work to **appraise** the defined growth scenarios; and
- 3) a statement (by Council officers) that aims to **respond** to the appraisal.

Defining growth scenarios

Section 5 of the main report explains *a process* that led to the definition of growth scenarios. The figure below presents a summary.

Figure A: Defining growth scenarios

Section 5.2 of the report gives consideration to **strategic factors**, with sub-sections for: A) development quantum; and B) broad distribution.

- Development quantum – focusing on housing (see the main report for discussion of employment land needs) the key point to note is the target of 1,038 homes per annum set by the London Plan, which applies up to and including the 2028/29 monitoring year. There is also clearly a ‘strategic’ need to deliver housing for the latter years of the plan period beyond 2029/29, but the London Plan (para 4.1.11) provides flexibility. This is important, because delivering 1,038 homes per annum in Camden is highly challenging given the extent of constraints to growth.
- Broad distribution – the discussion under this heading in the main report starts from an understanding that there is an emerging preferred approach to housing land supply that has evolved over a number of years. From this starting point, the discussion in the main report aims to explore broadly what options are open to the Council with a view to ‘boosting housing supply’, i.e. delivering additional homes (over-and-above the emerging preferred approach) in order to close the gap to the London Plan target figure. This essentially means considering where, within the Borough, and what types of allocation could feasibly be suited to higher density development and/or an adjustment to the preferred use mix in favour of additional space for new homes (likely at the expense of employment floorspace). The section concludes:
 - Options for boosting housing supply are inherently limited locally, given the densely developed nature of the Borough, constraints to growth and a need to balance competing land use priorities. Also, options are limited because many sites have planning permission.

- Options for boosting housing supply relate to questions around *how* development is brought forward, more so than *where* development is brought forward. However, there is a clear spatial focus on Kentish Town and the Camley Street area. Within these areas there are large industrial sites that are clearly suited to employment-led intensification, but within this bracket there may be choices to explore through the Local Plan, to include consideration of options for boosting housing.

Section 5.3 of the main report then introduces the **site options** in contention for allocation. In practice, this essentially amounts to introducing the proposed allocations, because there are no ‘omission sites’ (i.e. available sites not proposed for allocation) realistically in contention for allocation (on the basis of site selection work completed by LB Camden Officers, as discussed in the main report). Section 5.3 also introduces the approach taken to defining the emerging preferred approach to density and use mix at each of the site options / proposed allocations.

Section 5.4 of the report then draws upon the preceding stages of work to give consideration to **growth scenarios for sub-areas**. Specifically, within four sub-areas, all proposed allocations are discussed in turn, with a view to identifying those associated with a clear and significant choice in respect of the number of homes delivered or, in other words, proposed allocations where there is potentially the option to ‘boost housing supply’. The section concludes... *“there is little or no opportunity to boost housing supply in West and North Camden, i.e. attention focuses on Central and South Camden. Within these areas, attention focuses on non-permitted industrial sites where the emerging proposed approach is mixed-use intensification. A very small number of additional site allocations are of also note, either in terms of site capacity or the balance between new homes and office space. Policy H2 across South Camden also warrants ongoing scrutiny.”*

Finally, Section 5.5 combines the sub-area scenarios to form **reasonable alternative growth scenarios** for the Borough as a whole. Again, the starting point is an understanding of the emerging preferred approach / growth scenario, and the task is to establish one or more alternatives.

With regards to higher growth, whilst there is a clear strategic case for exploring scenarios of this nature, and the discussion in Section 5.4 serves to identify broad options for boosting supply, it is not possible to identify options for boosting supply with any precision. As such, just one higher growth scenario is defined and in broad terms.

With regards to lower growth scenarios, there is a more limited strategic case, but there is one specific strategic argument, namely: there is a case to be made for lower growth involving ongoing protection of industrial land, i.e. not following through on long discussed plans for mixed use redevelopment ('intensification') of select industrial sites.

As such, three reasonable alternative growth scenarios were defined for appraisal – see Table A. Section 5.5 then ends with a discussion of feasible higher growth scenarios that are ruled out on balance, given the constraints to growth affecting the Borough / challenges to delivering growth.

Table A: The reasonable alternative growth scenarios

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

Appraising growth scenarios

Section 6 of the main report presents the appraisal of reasonable alternative growth scenarios. Specifically, it presents an appraisal 'matrix' that enables the merits of the three scenarios to be considered under the SA framework.

The appraisal matrix is presented below as Table B. It aims to:

- rank the scenarios in order of performance (with a star indicating best performing, "=" used where it is not possible to differentiate and "?" used where there is fundamental uncertainty at this stage); and then
- categorise performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**, where: red indicates a significant negative effect; amber a negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect; and no colour indicates a neutral effect.

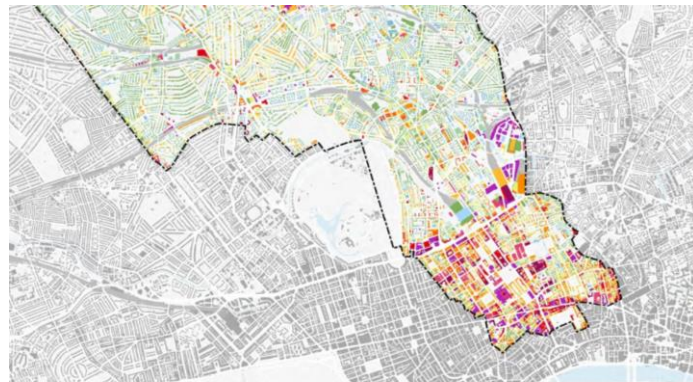
The appraisal arguably serves to suggest that **lower growth** performs quite poorly overall. Under this scenario the assumption is that a business as usual approach is taken to protecting industrial land, such that there would be a reduced focus on mixed-use intensification of existing industrial sites.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

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

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

However, potential concerns with higher growth relate to:

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



LB CAMDEN
BUILDING HEIGHTS STUDY



Building heights are a key consideration for the Local Plan

Table B: Summary appraisal of the reasonable growth scenarios

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

The preferred growth scenario

Section 7 presents the following statement provided by Officers:

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

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

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

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

Appraisal of the draft plan

Section 9 presents an appraisal of the Draft Local Plan as a whole. The appraisal is presented as a narrative under the SA framework, with each topic-specific narrative structured as follows:

- Spatial strategy – this is an opportunity to elaborate on the appraisal of Growth Scenario 2 from Section 6.
- Development management policy – the plan presents a range of area-wide / thematic (strategic and non-strategic) and site-specific policies.
- Conclusion on the draft plan – formally conclude on significant effects.

The 15 topic-specific conclusions are presented below.

Homes

A key benefit of the Local Plan is the inclusion of site policies that seek to achieve the most efficient use of each site, accounting for any opportunities or constraints, and with housing as the priority land use. Equally, a key benefit of the Local Plan is development management policy aimed at securing a good housing mix, in terms of type, size and tenure, which will apply to all development proposals, i.e. both for proposed allocations and windfall sites. This includes Policy H2, which seeks to address an existing issue of development schemes coming forward in some parts of the Borough without any self-contained homes.

Policy H4 on affordable housing is also crucially important, including in respect of meeting the housing needs of specific groups.

Policies supportive of alternative land uses or with cost/viability implications potentially lead to a degree of tension with housing related objectives, recognising the extent of housing needs locally, but it is difficult to pinpoint / recommend specific changes that might be made, recognising the need for draft policies to strike a balance in light of wide ranging objectives.

On balance, therefore, it is considered appropriate to predict a **neutral effect**. Clearly the plan will result in an improvement on the baseline situation, but there is a need to reach conclusions on significant effects in light of established targets, including in respect of housing need. Whilst the plan aims to provide for 11,550 homes to 2041 and in doing so supports a boost to housing delivery relative to recent rates, there are alternative higher target figures that might ideally be provided for, considering matters purely from a perspective of aiming to realise housing-related objectives.

Health

This topic is clearly a key focus of all aspects of the Local Plan including: spatial strategy / site selection; decision-making in respect of site capacity and use mix; and the proposed suite of development management policies.

As such, it is fair to predict a **significant positive effect**. It is difficult to identify any strategic policy choice (i.e. options for significantly boosting the performance of the plan, in terms of health objectives); however, there will be a need for ongoing consideration of options, recognising that planning

for good health in urban areas is a policy area high on the national agenda. It is important to ensure that issues are addressed / opportunities realised through the Local Plan as far as possible, as opposed to placing reliance on the development management / planning application stage.

Equality

Development supported through the Local Plan will lead to wide-ranging benefits – from affordable housing to new jobs, to training and apprenticeships, community facilities and open spaces – and there are few identified tensions. The approach in the plan also focuses on designing places that reflect and celebrates Camden's diversity and that are welcoming, inclusive and accessible to all to meet the needs of Camden's diverse communities.

However, the significance of benefits deriving from the Local Plan is limited, i.e. many key equalities-related issues and opportunities are largely outside the scope of the Local Plan to influence. There will be a need to further explore issues and opportunities ahead of plan finalisation, recognising that this will likely be a key topic that generates interest and comment through the current consultation. As such, a **'limited or uncertain' positive effect** is predicted at the current stage.

Amenity

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

Open space

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

Biodiversity

After having taken account of site-specific and area-wide development management policy it is fair to predict a **'limited or uncertain' positive effect** on the baseline. In the Camden context there is clear potential for development to boost biodiversity, and the plan has a strong focus on realising opportunities. The broad spatial approach to targeting measures might be explored further prior to plan finalisation, recognising the importance of taking a strategic approach (Local Nature Recovery Network).

Air quality

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

Energy and resources

Whilst the Local Plan will see an improvement on the baseline, there is a need to reach conclusions taking account of established objectives and targets, in particular the Borough's 2030 net zero target. In this light, there is a high bar to reach before predicting positive effects of any significance, and so a **'moderate or uncertain positive effect'** is predicted. There is a need for further work to explore spatial strategy, site and scheme-specific decarbonisation opportunities and, in this respect, it is noted that a future Local Energy Area Plan may identify locations for energy infrastructure. The proposed net zero development policy is strongly supported, but must be scrutinised in light of a December 2023 [Ministerial Statement](#).

Water

A key consideration is development activities impacting on groundwater, including basement developments, but the proposed spatial strategy does not lead to any particular concern. In addition to Policy NE4 (Water quality), Policy D6 (Basements) is clear that:

“The Council will only permit basement development where it is demonstrated... that the proposal would not cause harm to... the structural, ground, or water conditions of the area.”

In this light, there is an argument for predicting a positive effect on the baseline; however, a **neutral effect** is predicted on balance.

Resilience

A key climate change adaptation / resilience consideration is flood risk, particularly surface water flood risk; however, there are no clear concerns associated with the proposed spatial strategy.

There is an argument for predicting a positive effect on the baseline; however, a **neutral effect** is predicted on balance. There will be a need to take account of comments received from the Environment Agency.

Design

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

Historic environment

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

Land

Ensuring the optimum use of land (with self-contained homes as the priority land use) is a key priority for the Local Plan. As such, a **‘limited or uncertain’ positive effect** is predicted.

Economy and employment

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

Centres

The Draft Local Plan has a clear ‘place-based’ focus, as part of which there is a focus on the potential for growth to support centres. However, there is overall quite limited growth directed to town centres.

After having accounted for the spatial strategy alongside the proposed suite of development management policies, and after having factored-in the baseline situation, a **‘limited or uncertain’ positive effect** is predicted.

Overall conclusions on the Draft Local Plan

The appraisal concludes broadly positive effects with no negative effects predicted, although there are a range of specific tensions between the emerging plan and sustainability objectives, and instances where the plan might ‘go further’ in order to realise opportunities. These tensions and potential opportunities can be explored further at the next stage.

Specifically, the appraisal concludes:

- **Significant positive effects** under two headings (Health; Economy).
- **Limited or uncertain positive effects** under eight headings.
- **Neutral effects** under the remaining five headings.

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

- In some respects the effects of the plan are fairly limited, as many proposed development sites have planning permission and for some DM policy areas there is limited choice open to the Council.
- Under some headings the plan is associated with pros and cons, such that it is difficult to conclude anything other than overall ‘neutral’ effects. This is most notably the case under the ‘Homes’ heading.

- In some cases the plan will clearly result in an improvement on the baseline situation, but there is a need to reach a conclusion on significant effects taking into account established objectives / targets. This is most notably the case under the 'Energy and resources' heading, where there is a need to account for the Borough's 2030 net zero commitment. Also, under the Homes heading, whilst there is no strict target in respect of supply that must be provided for post 2029, it is clear that housing need is very high.

Issues and tensions with sustainability objectives identified through the appraisal should be taken into account when updating the plan subsequent to the current consultation, alongside consultation responses received and other new/updated evidence. However, it is recognised that the local plan must ultimately strike a balance between wide-ranging objectives.

Cumulative effects

There is a requirement to consider 'cumulative effects', i.e. the effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects.

For Camden, this primarily translates as a need to consider the implications of the Local Plan for other London Boroughs, for sectors of London (e.g. the CAZ) and for London as a whole. In this respect, there will be a need to take careful account of consultation responses received from neighbouring boroughs and the Greater London Authority. As well as the larger-than-local Housing Market Area (HMA) within which Camden is located, the Functional Economic Market Area (FEMA) is an important geography.

In these respects, it may also be possible to finalise the plan in light of some evidence provided as part of the London Plan Review. It is important to be clear that the London Plan Review will be well placed to distribute housing and employment growth, accounting for infrastructure and other facts.

Next steps

The steps to plan adoption are discussed below, followed by a brief discussion of monitoring plan implementation.

Publication of the Proposed Submission Local Plan

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the local plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination.

The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004, which essentially amounts to an appraisal of "the plan and reasonable alternatives" and "an outline of the reasons for selecting the alternatives".

It should be noted that further work can and will be undertaken to explore reasonable alternatives subsequent to the current consultation, and so suggestions are welcomed. As well as alternative growth scenarios, there is the potential to explore alternatives for other policy areas / issues.

Submission, examination and adoption

Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised.

At Examination, the Inspector will consider representations before directing the Council to prepare modifications, which will then be published for consultation (with SA work undertaken as necessary). Once found to be 'sound' the Local Plan will be adopted by the Council. At that time an SA 'Statement' will set out certain information, including on monitoring.

Monitoring

There is a new focus under the Levelling Up and Regeneration Act 2023 on monitoring "outcomes". On the basis of the appraisal above, monitoring efforts could be focused on housing delivery broken down by location within the Borough and/or the nature of the scheme (e.g. strategic schemes; or schemes involving a particular existing use, e.g. industrial). Matters relating to net zero development also warrant close monitoring, with a focus both on minimising operational energy use / greenhouse gas emissions and also minimising embodied emissions through building reuse etc.