



WEST HAMPSTEAD NDF
Neighbourhood Development Forum

Strategic Environmental Assessment (SEA) of the Fortune Green & West Hampstead Neighbourhood Development Plan



Environmental Report
August 2014



REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	May 2014	Environmental Report published for consultation alongside the Draft (pre-submission version) Plan	Chris Eves Assistant Consultant Shane Scollard Graduate Consultant	Mark Fessey Principal Consultant	Steve Smith Technical Director
2	August 2014	Environmental Report published for consultation alongside the Draft (submission version) Plan	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Strategic Environmental Assessment (SEA) in support of the emerging Fortune Green and West Hampstead Neighbourhood Development Plan (NDP).
- 1.1.2 **The NDP** is being drawn up using the powers in the Localism Act 2011. The NDP is being prepared 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 (2011) and the Camden Council Local Plan (in particular, the Core Strategy of 2010), it will provide a framework for determining planning applications.
- 1.1.3 **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 SEA EXPLAINED

- 2.1.1 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
- 2.1.2 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 STRUCTURE OF THIS ENVIRONMENTAL REPORT

- 3.1.1 This document is the Environmental Report for the Fortune Green and West Hampstead 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 were established through 'scoping' work at the outset of the process. Scoping involves: review of the environmental context and baseline; analysis of key environmental issues / objectives; and consultation with designated agencies.
 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 1.1 explains more about the regulatory basis for answering these questions.

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. A screening assessment was undertaken for the Fortune Green and West Hampstead NDP by Camden Council in December 2013. The screening assessment identified the potential for significant environmental effects, and hence the NDP is 'screened-in' as requiring SEA.

² Directive 2001/42/EC

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

Table 1.1: 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?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues & objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan.
What are the SEA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

N.B. The right-hand column of Table 1.1 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'S THE SCOPE OF THE SEA?

4 INTRODUCTION (TO PART 1)

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 below.

- What's the plan seeking to achieve?
- What's the 'context'?
- What's 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 wellbeing | • Sustainable 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 Fortune Green and West Hampstead 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 Extending the scope of an SEA in this way does not mean that environmental issues are less likely to achieve prominence in plan-making.

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 2014.

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 1** lists the Camden 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 Fortune Green & West Hampstead 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, while recognising the need for sustainable development.

5.1.2 The draft plan’s vision for the area is that development in Fortune Green and West Hampstead will allow for a mixed, vibrant and successful local community. This NDP will seek to retain and protect valued features, while allowing for new housing, new jobs and sustainable growth in the years ahead.

- 5.1.3 More specifically, the NDP will address the following:
- the development and design of housing and how it compliments the character of the area;
 - development of the West Hampstead Growth Area;
 - development of additional sites outside the growth area;
 - the provision of transport infrastructure and community facilities;
 - economic growth, employment and providing sites for business use; and
 - the protection and enhancement of the natural environment.

5.2 What’s 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'S THE 'CONTEXT'?

The Environmental Report must include...

- The relevant sustainability objectives, established at international / national level
- 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 & noise

European context

6.2.1 The **EU Thematic Strategy on Air Pollution**¹¹ aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).

The 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 wellbeing 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 04/2013)

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 04/13)

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 04/13)

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
 - Air quality awareness-raising initiatives
 - Lobbying and partnership working
 - Other Local Authorities, schools businesses and community groups.

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 04/13)

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 04/13)

¹⁶ GLA (2004) The Mayor's Noise Strategy [online] available at: <http://static.london.gov.uk/mayor/strategies/noise/> (accessed 03/14)

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 03/14)

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 Strategy**¹⁹ 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’.

The 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’. Set out an approach to housing density to reflect local circumstances.

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
- 6.3.4 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
- 6.3.5 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

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)

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/alivinglandscape> (accessed 04/13)

- 6.3.6 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
- 6.3.7 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
- 6.3.8 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
- 6.3.9 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
- 6.3.10 Finally, it is important to consider the following objectives, which are listed in the **2004 SEA Practice Guidance**: Avoid damage to designated wildlife and geological sites and protected species; Maintain biodiversity, avoiding irreversible losses; Restore the full range of characteristic habitats and species to viable levels; Ensure the sustainable management of key wildlife sites and the ecological processes on which they depend; Provide opportunities for people to come into contact with and appreciate wildlife and wild places.

London specific context

- 6.3.11 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

- 6.3.12 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 wellbeing 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 Habitats²⁸

²³ The Wildlife Trusts & TCPA (2012) Planning for a healthy environment: good practice for green infrastructure and biodiversity [online] available at: <http://www.wildlifetrusts.org/news/2012/07/06/planning-healthy-and-natural-environment> (accessed 04/13)

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 04/13)

²⁵ Landscape institute (2013) Green Infrastructure: An integrated approach to land use [online] available at: <http://www.landscapeinstitute.org/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf> (accessed 04/13)

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 04/13)

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 04/13)

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 03/14)

6.4 Climate change mitigation (non-transport related)

N.B. 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

6.4.1 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.

The National Planning Policy Framework (NPPF)

6.4.2 Key messages include -

- Support transition to a low carbon future in a changing climate as a 'core principle'.
- 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 local requirements for building's sustainability in a way that is consistent with the 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 reducing congestion.

Supplementing the NPPF

6.4.3 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.

6.4.4 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 whole communities.*³²

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 04/13)

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 04/13)

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 04/13)

- 6.4.5 **Building a Greener Future: Towards Zero Carbon Development** set out the Government's proposals to reduce the carbon footprint of new housing development and indicates the Government's views on the importance of moving towards zero carbon in new housing.³³
- 6.4.6 In-line with the mandatory requirements of the Waste Framework Directive, the **Waste Management Plan for England** includes analysis of:³⁴
- The current waste management situation and the measures to be taken to improve environmentally sound preparing for 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.³⁵
- 6.4.8 The Mayor's municipal waste management strategy aims to:³⁶
- 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
 - 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 970kg per household in 2009/10 to 790kg per household by 2031. This is equivalent to a 20 per cent 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 per cent by 2020 and 60 per cent 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.

³³ CLG (2006) Building a Greener Future: Towards Zero Carbon Development – Consultation [online] available at: <http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/archived/publications/planningandbuilding/buildinggreener> (accessed 03/14)

³⁴ Defra (2013) Waste Management Plan for England [online] available at: <https://www.gov.uk/government/publications/waste-management-plan-for-england> (accessed 03/14)

³⁵ 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 04/13)

³⁶ 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 03/14)

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:³⁷

- 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 3% by 2012 and by 15% by 2020.

6.5 Community and wellbeing

The 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 wellbeing for all'.
- Facilitate social interaction and creating healthy, inclusive communities'.
- 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'.

³⁷ 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 03/14)

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'*.³⁸ 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.³⁹
- 6.5.4 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.⁴⁰
- 6.5.5 The Select Committee on Public Service and Demographic Change report **Ready for Ageing?** warns 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.⁴¹
- 6.5.6 The report **Under the Weather** presents a toolkit to help Health and Wellbeing Boards take into account climate change adaptation. For example, the report highlights that heat related illness can be addressed through planning of the built environment.⁴²
- 6.5.7 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. The report highlights the potential of the CIL (Community Infrastructure Levy) and also emphasises the role of the developer in proving how a development will benefit health through its public realm and its links to existing infrastructure.⁴³

³⁸ 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 04/13)

³⁹ 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 02/14)

⁴⁰ TCPA (2013) Planning Healthier Places [online] available at: http://www.tcpa.org.uk/data/files/Planning_Healthier_Places.pdf (accessed 02/14)

⁴¹ 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/> (accessed 04/13)

⁴² Environment Agency (2014) Under the Weather, Improving Health, wellbeing and resilience in a changing climate.

⁴³ 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> (accessed 02/14)

- 6.5.8 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.⁴⁴
- 6.5.9 The Environmental Audit Committees report **Sustainable Food** highlights the lack of government guidance on providing better access to local and sustainable food. It recommends that Local Policies should provide communities with open space to grow their own.⁴⁵
- 6.5.10 Finally, it is important to consider the following objectives, which are listed in the **2004 SEA Practice Guidance**: Create conditions to improve health and reduce health inequalities; Promote healthy living; Protect and enhance human health; Reduce and prevent crime, reduce fear of crime; Decrease noise and vibration.

London specific context

- 6.5.11 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.⁴⁶

Camden specific context

- 6.5.12 The **Camden Plan 2012-2017** is the council's 5 year vision for Camden. It is relevant to the full spectrum of Council services, and sits alongside the Core Strategy (which is focused specifically on spatial planning related issues). The 'ambition' for Camden is: *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.*⁴⁷
- 6.5.13 **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 strategic priorities shared by all services for children and families in the area are set out in the plan. These priorities are agreed in partnership by the local authority, schools, health services, police and other agencies, including the voluntary and community sector. Priorities are:⁴⁸
- 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

⁴⁴ New Economic Foundation (2012) Natural Solutions [online] available at: <http://www.neweconomics.org/publications/entry/natural-solutions> (accessed 02/14)

⁴⁵ Environmental Audit Committee (2012) Sustainable Food [online] available at: <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenvaud/879/87902.htm> (accessed 04/13)

⁴⁶ 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 04/13)

⁴⁷ 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 03/14)

⁴⁸ <http://www.camden.gov.uk/ccm/navigation/community-and-living/your-local-community/children-and-young-people-s-partnership/plan/>

- Improve outcomes for vulnerable children and young people, including looked-after children, those with special educational needs and / or a disability.

6.5.14 The **Camden Community Safety Partnership** has four priorities:⁴⁹

- Antisocial behaviour
- Domestic and sexual violence
- Night time economy
- Serious youth violence and drugs

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.⁵⁰

The 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.⁵¹

⁴⁹ See <http://www.camden.gov.uk/ccm/content/council-and-democracy/plans-and-policies/camden-strategies-%26-partnerships/safer-camden-strategy.en> (accessed 03/14)

⁵⁰ 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 04/13)

⁵¹ 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 02/14)

- 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.^{52 53}

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.⁵⁴

- 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.⁵⁵

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.

6.7 Heritage

The 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.

⁵² 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 02/14)

⁵³ 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 02/14)

⁵⁴ GLA (2010) Mayor’s Economic Development Strategy [online] available at: <http://www.london.gov.uk/priorities/business-economy/publications/economic-development-strategy> (accessed 03/14)

⁵⁵ 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 04/13)

- 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. Also of note is the reference to promoting the role of the historic environment within the Government's response to climate change.⁵⁶
- 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.⁵⁷ 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.⁵⁸
- 6.7.4 **Understanding place: conservation area designation, appraisal and management** 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 the new development plans system.⁵⁹
- 6.7.5 **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 in that setting may impact its historic significance.⁶⁰
- 6.7.6 **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.⁶¹
- 6.7.7 Finally, it is important to consider the following objectives, which are listed in the **2004 SEA Practice Guidance**: Preserve historic buildings, archaeological sites and other culturally important features; Create places, spaces and buildings that work well, wear well and look well; Value and protect diversity and local distinctiveness; Improve the quantity and quality of publicly accessible open space.

London specific context

- 6.7.8 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'.⁶²

⁵⁶ 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 04/13)

⁵⁷ 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 04/13)

⁵⁸ 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 04/13)

⁵⁹ English Heritage (2011) Understanding place: conservation area designation, appraisal and management [online] available at: <http://www.english-heritage.org.uk/publications/understanding-place-conservation-area/> (accessed 03/14)

⁶⁰ English Heritage (2011) Guidance on the Setting of Heritage Assets [online] available at: <http://www.english-heritage.org.uk/publications/setting-heritage-assets/> (accessed 03/14)

⁶¹ 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 03/14)

⁶² 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 04/13)

6.8 Housing

The 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:⁶³

- Overcrowding: This situation is worsening, and current measures to tackle under-occupation may not necessarily resolve the problem.
- Homelessness: There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by cuts to Housing benefit during 2013.
- Empty Homes: Despite 720,000 homes currently being classed as empty, the situation seems to be an improving one. This is particularly the case with long-term empty homes.

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:^{64 65}

- 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.

⁶³ The Chartered Institute of Housing, National Housing Federation & 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 04/13)

⁶⁴ 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 04/2013)

⁶⁵ 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 04/2013)

- 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.⁶⁶
- 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.⁶⁷

Camden specific context

- 6.8.6 Camden Housing Strategy sets out the following priorities:⁶⁸
- 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.

The National Planning Policy Framework (NPPF)

- 6.9.2 Key messages include -
- Set strategic policy to deliver conservation and enhancement of the natural and historic environment, including landscape.
 - Protect and enhance valued landscapes. Give particular weight to conserving scenic beauty.

Supplementing the NPPF

- 6.9.3 **Guidance on Tall Buildings** sets out how CABI 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.⁶⁹

⁶⁶ 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 02/14)

⁶⁷ 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/> (accessed 02/14)

⁶⁸ 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 03/14)

⁶⁹ 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 03/14)

6.10 Transport

The 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 transport modes (including walking, cycling and public transport), giving people a real 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 emissions⁷⁰. Plans should ensure that strategic policies support and encourage both walking and cycling.⁷¹

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:⁷²

- Regular and straightforward connections at all stages of the journey and between different modes; and
- Safe, comfortable transport facilities.
- Cycling and walking facilities and stations at the heart of the ‘plug-in hybrid vehicle programme’.

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:⁷³

- 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
- Ensure the transport system supports Camden’s sustainable growth and regeneration as well as enhancing economic and community development

⁷⁰ Lancaster University, University of Leeds & Oxford Brookes University (2011) Understanding Walking and Cycling: Summary of Key Findings and Recommendations [online] available at: http://www.its.leeds.ac.uk/fileadmin/user_upload/UWCRReportSept2011.pdf (accessed 08/2012)

⁷¹ 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>

⁷² 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 04/13)

⁷³ 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 03/2014)

- 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.⁷⁴

The 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, coastal change, water supply and changes to biodiversity and landscape'. Planning authorities are encouraged to 'adopt proactive strategies' to adaptation.
- New developments should be planned so that they avoid vulnerability to climate change.
- 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.

⁷⁴ 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 03/2014)

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.⁷⁵ Measures are put in place to encourage and incentivise water efficiency. Through these measures and the demand management measures set out in Water Resource Management Plan's for water companies, the Government aspires to reduce average demand to 130 litres per head, per day by 2030.
- 6.11.6 The Water White Paper led to a Government consultation on a national strategy on urban pollution in 2012. The consultation report notes that pollutants affecting waterbodies can be broken down into a number of categories including:⁷⁶
- 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, e.g. from industry, commerce, agriculture, and civil functions, is responsible for 49% of the pollution related to failing water bodies.
- 6.11.7 The **Flood and Water Management Act** sets out the following objectives regarding flood risk management:⁷⁷
- Incorporate greater resilience measures into the design of new buildings, and retro-fit at risk properties (including historic buildings);
 - Utilise the environment, e.g. utilise land to reduce runoff and harness wetlands to store water; and
 - Identify areas suitable for inundation and water storage.
- 6.11.8 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'.⁷⁸
- 6.11.9 An Environment Agency strategy implements the requirements of the WFD in relation to **groundwater**. The strategy highlights that groundwater is at risk from both point source and diffuse pollution. The good quality of groundwater is crucial for water-dependent plants and animals, and for the use of groundwater as a source of drinking water.⁷⁹
- 6.11.10 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.⁸⁰

⁷⁵ Defra (2011) Water for life (The Water White Paper) [online] available at <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf> (accessed 02/14)

⁷⁶ 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 02/2014)

⁷⁷ Flood and Water Management Act (2010) [online] at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> (accessed 02/2014)

⁷⁸ CIRIA (2010) Planning for SuDs – making it happen [online] available at: <http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465> (accessed 02/14)

⁷⁹ Environment Agency (2012) GP3: Groundwater Protection: Policy and Practice [online] available at: <http://www.environment-agency.gov.uk/research/library/publications/144346.aspx> (accessed 02/2014)

⁸⁰ 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 04/2013)

- 6.11.11 Finally, it is important to consider the following objectives, which are listed in the 2004 SEA Practice Guidance: Limit water pollution to levels that do not damage natural systems; Maintain water abstraction, run-off and recharge within carrying capacity (including future capacity); Reduce contamination, and safeguard soil quality and quantity; Maintain and restore key ecological processes (e.g. hydrology, water quality); Reduce vulnerability to the effects of climate change e.g. flooding, disruption to travel by extreme weather, etc.

London specific context

- 6.11.12 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.⁸¹
- 6.11.13 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.⁸²

Camden specific context

- 6.11.14 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.⁸³

⁸¹ 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 03/2014)

⁸² Environment Agency (2006) Bringing your rivers back to life – A Strategy for restoring rivers in North London [online] available at: <http://www.restorerivers.eu/Publications/tabid/2624/mod/11083/articleType/ArticleView/articleId/3238/Bringing-your-rivers-back-to-life.aspx> (accessed 03/14)

⁸³ 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 03/2014)

7 WHAT'S 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.
- 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 & 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 deaths⁸⁴ were attributed to PM_{2.5} in Camden.⁸⁵

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.⁸⁶

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 Roads with the highest traffic volumes, such as Finchley Road, have the worst air pollution levels in the borough. Increases in population and employment are likely to further impact on Camden's air quality as the demand for the movement of freight grows.⁸⁷

7.2.5 Studies undertaken on European Car-Free Day in 2002 have shown that ambient noise levels were significantly reduced, particularly on Great Russell Street and Woburn Square, which are important east-west links with high traffic flows normally.⁸⁸

⁸⁴ 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.

⁸⁵ 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 03/2014)

⁸⁶ 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 03/14)

⁸⁷ 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 03/2014)

⁸⁸ 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 03/14)

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 – 16.1ha
 - Local Nature Reserve – 1.8ha
 - Site of Importance for Nature Conservation –
 - Metropolitan – 323.8ha
 - Borough Grade I – 39.78ha
 - Borough Grade II – 31.9ha
 - Local – 18.4ha
- 7.3.2 The proportion of Sites of Importance for Nature Conservation (SINCs) considered to be in 'positive conservation management' stood at 58% in 2012 (or 21 of the 36 SINCs).⁸⁹ Across Camden, many vacant sites have become havens for urban wildlife such as on railway embankments, in areas where very little other habitat exists;⁹⁰ however, it is not thought that this is an issue in the plan area.
- 7.3.3 There are five priority species identified within the Camden Biodiversity Action Plan. These are the bat, hedgehog, house sparrow, odanata (dragon flies and damsel flies) and stag beetle.⁹⁰
- 7.3.4 Camden is around 2,171ha in size, of which around 529ha is open space. Of this area an estimated 400ha is publicly accessible. This means that the borough is considered deficient in terms of accessible open space. In addition, some areas of the borough more than 1km walking distance from a publicly accessible Borough or Metropolitan SINC, and so may be considered deficient in access to the natural environment (red shaded areas in Figure 7.1).⁸⁹
- 7.3.5 There is 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.
- 7.3.6 In terms of the regional delivery of GI, the All London Green Grid is to provide a strategic interlinked network of high quality green infrastructure and open spaces that connect with town centres, public transport nodes, the countryside in the urban fringe, the Thames and major residential areas.⁹¹ The NDP area falls within the Central London area of the Grid.⁹²

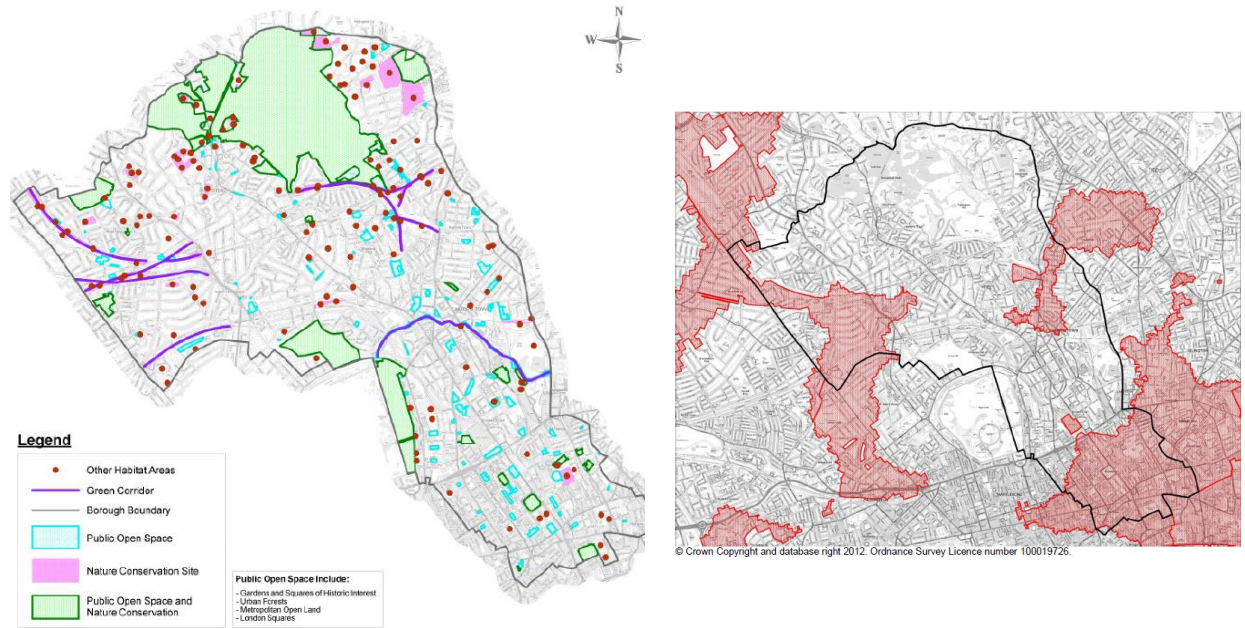
⁸⁹ LB Camden (2013) Camden Biodiversity Action Plan 2013-2018 [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset/?asset_id=3132995 (accessed 03/14)

⁹⁰ 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 03/14)

⁹¹ 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_SPG_Mar2012.pdf (accessed 03/14)

⁹² 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 03/14)

Figure 7.1: Open spaces and conservation sites (left)⁹³ and areas of deficiency⁹⁴ in access to the natural environment in Camden (right)⁹⁵



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 2011 (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.⁹⁶

Table 7.1: CO₂ emissions within the scope of influence of Local Authorities – Annual per capita emissions in tonnes (2005 and 2011)⁹⁷

Area	Year	Industry & 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

⁹³ 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 03/2014)

⁹⁴ 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

⁹⁵ 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)

⁹⁶ 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 04/13)

⁹⁷ 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 03/14)

- 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.⁹⁸
- 7.4.3 In terms of renewable energy generation in major schemes permitted in the borough, rates have been variable, with 2 of 29 developments generating more than 20% of their power from renewable sources in 2010/11, 10 of 19 developments in 2011/12, and 4 of 23 developments in 2012/13.⁹⁹

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 2020.¹⁰⁰

7.5 Community and wellbeing (including health)

- 7.5.1 In 2013, Camden had an estimated population of 225,140 people.¹⁰¹ In 2011 there were a total of 12,060 residents in West Hampstead and 11,740 residents in Fortune Green, compared to 10,053 and 10,465 respectively in 2001.¹⁰² ¹⁰³ Camden's population is expected to rise to 246,100 by 2023, representing an increase of 8.5%. Expected population growth will not be evenly spread through the Borough (Figure 7.2). Sizeable increases are expected in West Hampstead, with an increase of 2,300 expected.¹⁰⁴

⁹⁸ 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 03/14)

⁹⁹ 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)

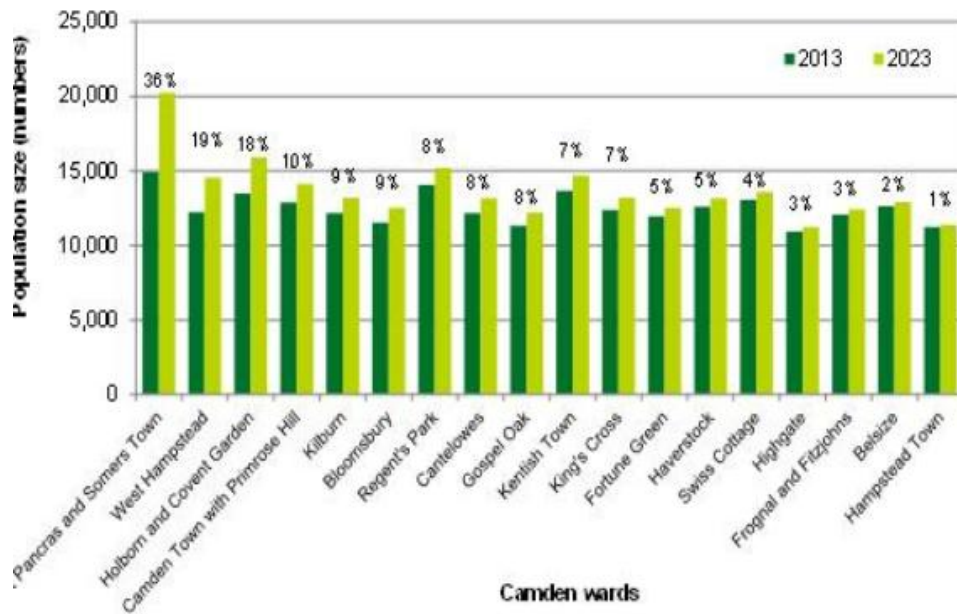
¹⁰⁰ LB Camden (2012) Regeneration and Planning: Annual Monitoring Report [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2970322 (accessed 03/14)

¹⁰¹ 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 03/14)

¹⁰² LB Camden (2013) 2011 Census release: Ward profile – West Hampstead [online] available at: http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilewesthampstead.pdf (accessed 03/14)

¹⁰³ LB Camden (2013) 2011 Census release: Ward profile - Fortune Green [online] available at: http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilefortunegreen.pdf (accessed 03/14)

Figure 7.2: Projected percentage change in population from 2013 to 2023 in Camden by ward, all ages



- 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 if of working age, with 73% aged between 16 and 64.¹⁰⁴
- 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. Growth in the population of old people.¹⁰⁴ In both West Hampstead and Fortune Green the 60-74 years age group saw the largest increase from 2001 to 2011 (3-9% and 3-10% respectively).^{105 106}
- 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.¹⁰⁷
- 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.¹⁰⁴

¹⁰⁴ 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 03/14)

¹⁰⁵ LB Camden (2013) 2011 Census release: Ward profile – West Hampstead [online] available at: http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilewesthampstead.pdf (accessed 03/14)

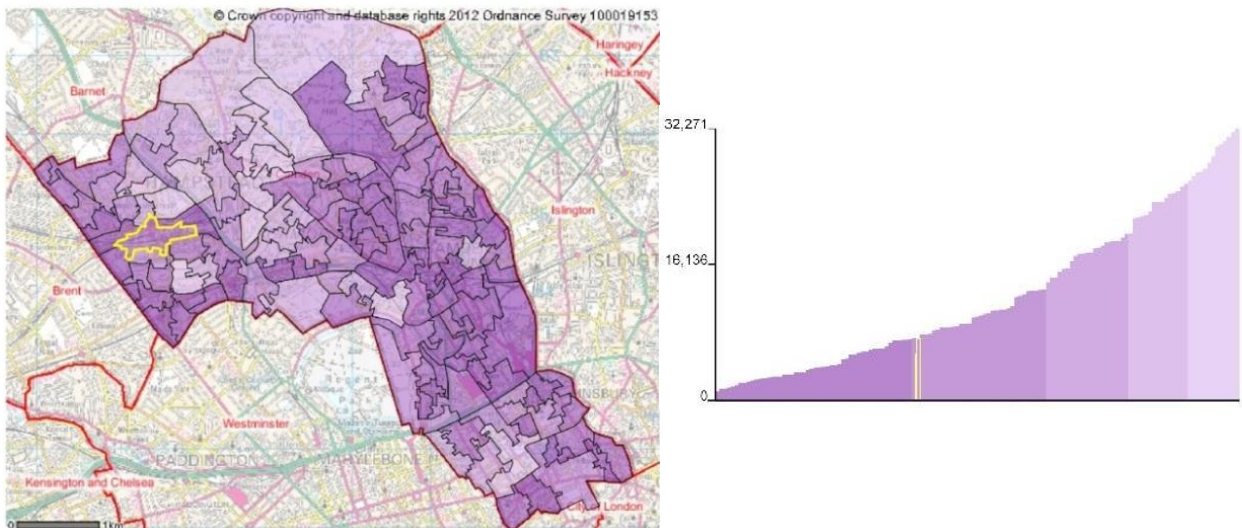
¹⁰⁶ LB Camden (2013) 2011 Census release: Ward profile - Fortune Green[online] available at: http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilefortunegreen.pdf (accessed 03/14)

¹⁰⁷ LB Camden & 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 03/14)

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 less extremes of affluence and deprivation than is the case for many other London Boroughs.¹⁰⁸ 37% of children in Camden live in poverty, the joint 7th highest level in the country.¹⁰⁹
- 7.5.7 As shown by Figure 7.3, the most deprived Lower Super Output Area (LSOA) in Camden is ranked 1,033rd nationally (where 1 = most deprived) and the least deprived (i.e. most affluent) LSOA is ranked 32,271st nationally. There are 34,753 LSOAs nationally. The highlighted LSOA covers the south east portion of the NDP area, centred on West Hampstead Underground Station. It is somewhere near the average for Camden, in terms of deprivation. Two LSOAs to the west, which fall within the NDP area, perform slightly worse (i.e. are slightly ‘more deprived’). The LSOA to the east, which falls within the NDP area, performs notably worse (ranked 6,189th nationally). The LSOA to the south west, which falls outside the NDP area (covering Netherwood Street and Palmerston Road) performs significantly worse (ranked 4,617th nationally and 11th within Camden).

Figure 7.3: Multiple Deprivation for Lower Super Output Areas within Camden, with the LSOA covering the south east portion of the NDP area highlighted¹¹⁰



¹⁰⁸ See <http://neighbourhood.statistics.gov.uk/>

¹⁰⁹ 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)

¹¹⁰ See <http://neighbourhood.statistics.gov.uk/>

Health

- 7.5.8 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.¹¹¹
- 7.5.9 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 and most deprived areas in Camden, and a 6.2 years gap for females.¹¹¹
- 7.5.10 The prevalence of childhood obesity is significantly higher in Camden than in England, and has remained so over the past five years.¹¹² Around one in ten 4-5 year olds and around one in five 10-11 year olds is obese.¹¹³ Children from the most deprived areas are more likely to be obese.¹¹⁴ It is estimated that 15.5% of Camden adults are obese.
- 7.5.11 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.¹¹³
- 7.5.12 In 2011, 7% of West Hampstead resident and 6% of Fortune Green residents felt that they were limited a lot in their daily lives as a result of their health. This compares to a Camden average of 8%.^{115 116}

Crime

- 7.5.13 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).¹¹⁷
- 7.5.14 Crime consistently appears as a priority issue for residents and businesses.¹¹⁸ 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.¹¹⁹

¹¹¹ LB Camden (2013) Joint strategic needs assessment – Chapter 2: overall health and wellbeing 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 03/2014)

¹¹² 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 03/2014)

¹¹³ 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)

¹¹⁴ 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)

¹¹⁵ LB Camden (2013) 2011 Census release: Ward profile – West Hampstead [online] available at: http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilewesthampstead.pdf (accessed 03/14)

¹¹⁶ LB Camden (2013) 2011 Census release: Ward profile - Fortune Green [online] available at: http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilefortunegreen.pdf (accessed 03/14)

¹¹⁷ LB Camden (2013) Joint strategic needs assessment – Chapter 6: community safety [online] available at: <http://www.camden.gov.uk/ccm/content/social-care-and-health/health-in-camden/joint-strategic-needs-assessment-2012/chapter-6-community-safety.en?page=3> (accessed 03/2014)

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 03/14)

¹¹⁹ LB Camden & 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 03/14)

Education

- 7.5.15 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 (inc. 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 2010.¹²⁰ 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.¹²¹
- 7.5.16 There is a lack of primary school places in the West Hampstead part of the borough with pressure expected to increase with population growth. In response, the Council has identified a site on Liddell Road.¹²² Growth in the Euston and King's Cross areas is also anticipated to generate demand for additional school places/ facilities in the borough.¹²³

Facilities

- 7.5.17 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.¹²³
- 7.5.18 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:¹²⁴
- Providing at least 9000m² 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

7.6 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 Camden are in 'knowledge economy' industries such as the media, finance, law and other professional services, with leisure entertainment and tourism also important.¹²⁵
- 7.6.2 The Retail 'Health Check' Study of the borough suggests 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.¹²⁵

¹²⁰ 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 03/2014)

¹²¹ 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)

¹²² LB Camden (2011) Shaping the future of the West Hampstead area – Consultation [online] available at: <http://www.ndpwesthampstead.org.uk/3Shaping%20the%20Future%20west%20hampstead%2026may2011.pdf> (accessed 03/14)

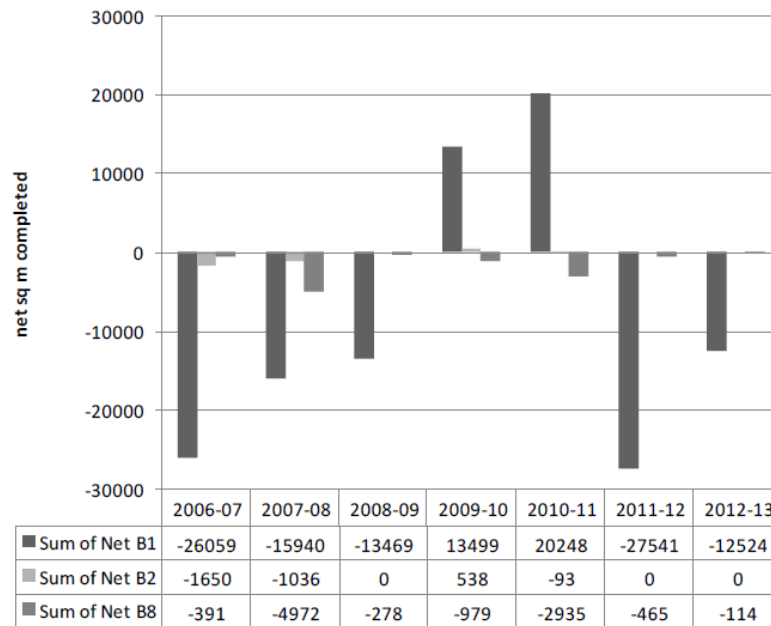
¹²³ LB Camden (2012) Euston AAP SA Scoping Report [online] available at: <http://www.eustonareaplan.info/wp-content/uploads/2012/09/Euston-Area-Plan-SA-Scoping-report-merged-19-09-2012.pdf> (accessed 03/14)

¹²⁴ 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 03/14)

¹²⁵ 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 03/14)

- 7.6.3 Monitoring data for Camden 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.¹²⁶ For example, there is pressure from existing site owners in the southern part of West Hampstead’s industrial area to build new accommodation on top of ground floor commercial uses.¹²⁷
- 7.6.4 The vacancy rates in all Camden’s shopping streets increased from 5% to 7% over the five years up to 2010/11. Over the same period Town Centre vacancy rates have either remained static or increased. In West Hampstead vacancy rates were up from 3% to 5%, although this increased figure was equal to or better than the vacancy rate in three of Camden’s five Town Centres. Neighbourhood Centres across the borough have shown mixed trends centre by centre over this period, but overall there has been an increase in vacancy from 7% to 10%.¹²⁶
- 7.6.5 Between 2006 and 2013 a decline in employment floorspace (i.e. B1 offices, B2 general industrial and B8 warehousing) has been observed (Figure 7.4). The majority of future employment floorspace is expected to be completed in the King’s Cross Growth Area.¹²⁸ 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.¹²⁸

Figure 7.4 Change in employment floorspace in Camden over seven years¹²⁹



- 7.6.6 West Hampstead is set to be a future area of growth in the borough. It has been identified as an ‘area for intensification’ in the London Plan and a ‘growth area’ in Camden’s LDF. The LDF suggests that there is capacity in the area for around 1000 new homes and 7,000m² of business floor space over the period to 2026.¹³⁰

¹²⁶ 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 03/14)

¹²⁷ LB Camden (2011) Shaping the future of the West Hampstead area – Consultation [online] available at: <http://www.ndpwesthampstead.org.uk/3Shaping%20the%20Future%20west%20hampstead%2026may2011.pdf> (accessed 03/14)

¹²⁸ 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)

¹²⁹ 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 03/2014)

¹³⁰ LB Camden (2011) Shaping the future of the West Hampstead area – Consultation [online] available at: <http://www.ndpwesthampstead.org.uk/3Shaping%20the%20Future%20west%20hampstead%2026may2011.pdf> (accessed 03/14)

- 7.6.7 West Hampstead offers a large proportion of food and drink outlets. These include restaurants, public houses, take-away restaurants, coffee houses, sandwich bars, cafes, delicatessens and an ice cream parlour. In 2010, businesses such as these currently occupied 52 of the 175 units (30%) in West Hampstead.¹³¹ Over 200 businesses from the cultural and creative industries sector are located in West Hampstead. Many of these are micro businesses (under 5 employees) or freelancers working from home.¹³⁰
- 7.6.8 Although the West Hampstead town centre benefits from a range of independent shops and has low vacancy levels, there is concern that the breadth of offer may not be varied enough to serve the needs of some of its residents and visitors. This is particularly the case in terms of comparison retailers.¹³¹

Employment

- 7.6.9 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).¹³²
- 7.6.10 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 2006.¹³³
- 7.6.11 There are demographic and geographic disparities in terms of unemployment in the Borough, with unemployment high in areas of deprivation and youth unemployment standing at around 7.2% (lower still than London and UK averages). In terms of geographical differences, an examination of the Indices of Deprivation 2007 Employment Indicator (Figure 7.5 below). The highlighted SOA, covering the south east portion of the NDP area, centred on West Hampstead Underground Station is near to the average in terms of the proportion of people experiencing employment deprivation. The SOA to the north-west of this area performs worse by this measure, as do those SOAs the east.¹³⁴

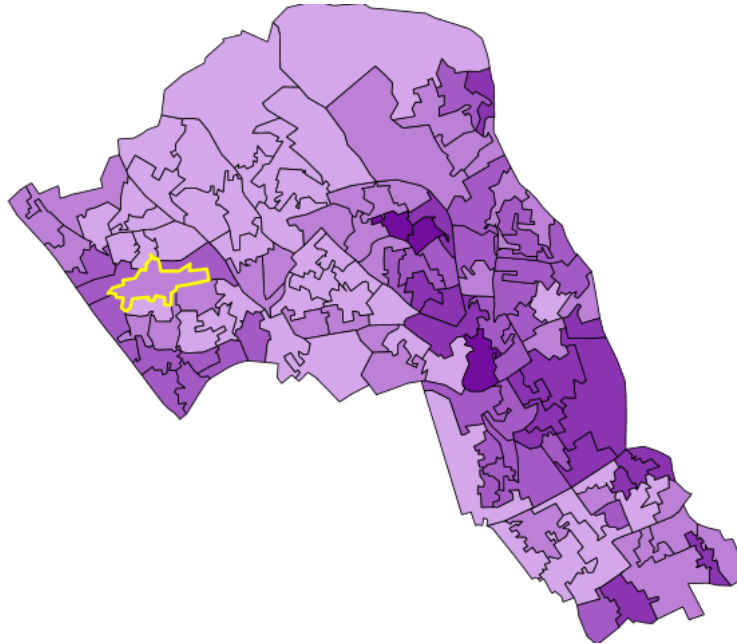
¹³¹ Health Check Retail Profile - West Hampstead Retail Profile [online] available at: [http://www.ndpwesthampstead.org.uk/4West%20Hampstead%20Extended%20Healthcheck%20\(04.03.11\).pdf](http://www.ndpwesthampstead.org.uk/4West%20Hampstead%20Extended%20Healthcheck%20(04.03.11).pdf) (accessed 03/14)

¹³² 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 03/14)

¹³³ 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 03/2014)

¹³⁴ See <http://neighbourhood.statistics.gov.uk/>

Figure 7.5: Indices of Deprivation: Combined Employment Indicator, with the SOA covering the south east portion of the NDP area highlighted



7.6.12 70% of West Hampstead residents are employed in managerial and professional roles, compared to 63% in Camden. In Fortunes Green the percentage is lower, but still above the borough average at 67%. In 2011, 5% (611) of the population of West Hampstead and 6% (592) of the population of Fortune Green were long-term unemployed or had never worked. This compares to 7% for Camden as a whole.^{135 136}

7.7 Heritage

7.7.1 There are 39 conservation areas, 5645 listed buildings and 13 Archaeological Priority Zones in Camden.¹³⁷ Large parts of the Camden area are covered by conservation areas and there are numerous listed buildings throughout the neighbourhood area (Figure 7.6).¹³⁸ There is also a registered park and garden in the area (Hampstead Cemetery).

¹³⁵ LB Camden (2013) 2011 Census release: Ward profile – West Hampstead [online] available at: http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilewesthampstead.pdf (accessed 03/14)

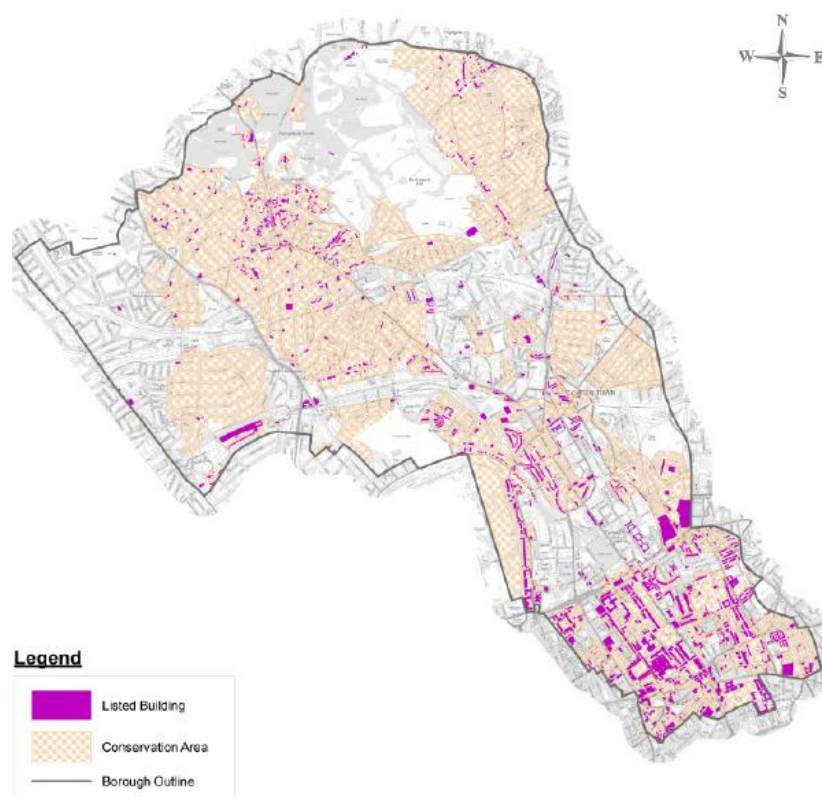
¹³⁶ LB Camden (2013) 2011 Census release: Ward profile - Fortune Green[online] available at: http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilefortunegreen.pdf (accessed 03/14)

¹³⁷ 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 03/14)

¹³⁸ 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 03/2014)

- 7.7.2 The West End Green Conservation Area falls within the NDP area and is characterised by a London village running along the spine of the West End Lane. The village character of this area has been absorbed but not erased by urban expansion over the late 19th and early 20th century. Problems include commercial pressures and a resulting decline in local retail, volumes of traffic, and pressure for parking. It is thought that high quality new development outside the area by the railway would enhance the area. There are no Buildings at risk.¹³⁹
- 7.7.3 The 2013 register showed a total of 40 Buildings at Risk entries, 3 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 2009.¹⁴⁰ Camden Council's Community Investment Programme intends to invest some of the funds raised in securing the future of parks and historic buildings.¹⁴¹

Figure 7.6: Conservation areas and listed buildings in Camden¹⁴²



¹³⁹ LB Camden (2011) West End Green Conservation Area Appraisal and Management Strategy [online] available at: <http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/fsi/west-end-green-conservation-area-appraisal-and-management-strategy.en> (accessed 03/14)

¹⁴⁰ LB Camden (2013) 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)

¹⁴¹ 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 03/14)

¹⁴² 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 03/2014)

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.¹⁴³
- 7.8.2 The costs of buying or renting a home on the open market within Camden are amongst the highest in London. In March 2011, the average house price in the borough stood at £550,000, up from £533,215 in March 2008.¹⁴⁴ 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.¹⁴³
- 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.¹⁴³
- 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 299.¹⁴⁵ 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 2011.¹⁴³
- 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.¹⁴⁴
- 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.¹⁴³
- 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 1650 new private homes which will be marketed to local people first.¹⁴⁶

¹⁴³ 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 03/14)

¹⁴⁴ 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 03/14)

¹⁴⁵ 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)

¹⁴⁶ 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 03/14)

7.9 Landscape and townscape

- 7.9.1 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.
- 7.9.2 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 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'.¹⁴⁷
- 7.9.3 In terms of the townscape, West End Lane forms the spine of the West Hampstead town centre. The area around the stations 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. This gateway area feels separated from the northern part of the West End Lane, which is considered to be the heart of the town centre area.¹⁴⁸

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.¹⁴⁹ The emergence of the proposed High Speed 2 terminus at Euston has London-wide significance.¹⁵⁰
- 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 7.7 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%.¹⁵¹
- 7.10.3 In 2011, 3,471 (59%) of households in West Hampstead and 2,897 (54%) households in Fortune Green had no access to a car or van. This compares to 53% in 2001 and 46% respectively in 2001.^{152 153}

¹⁴⁷ Natural England (2011) London's Natural Signatures: the London Landscape Framework [online] available at:

<http://www.naturalengland.org.uk/regions/london/ourwork/wildlondon/naturalsignatures/default.aspx> (accessed 03/14)

¹⁴⁸ LB Camden (2012) West Hampstead: Shaping the Future: A plan for the wider West Hampstead area [online] available at:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/place-plans/> (accessed 03/14)

¹⁴⁹ 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 03/2014)

¹⁵⁰ 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 03/14)

¹⁵¹ 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)

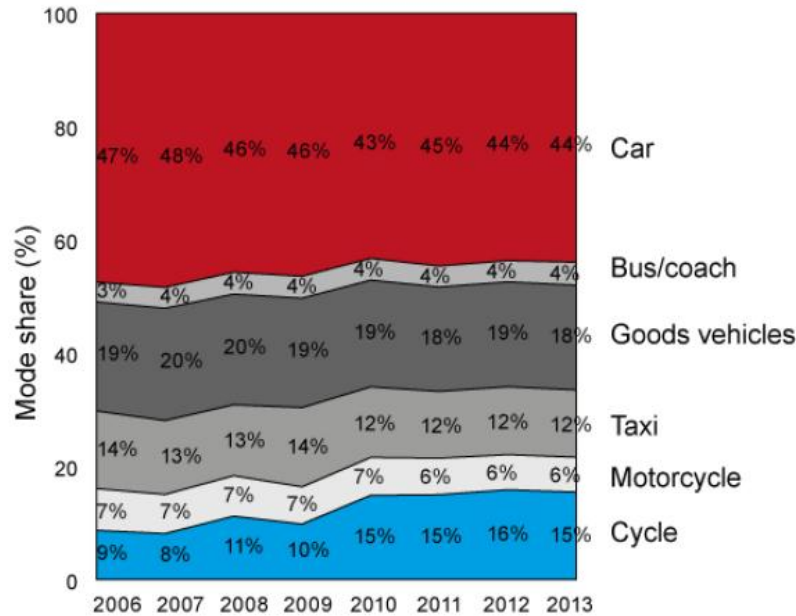
¹⁵² LB Camden (2013) 2011 Census release: Ward profile – West Hampstead [online] available at:

http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilewesthampstead.pdf (accessed 03/14)

¹⁵³ LB Camden (2013) 2011 Census release: Ward profile - Fortune Green [online] available at:

http://www.ndpwesthampstead.org.uk/4_2011Censuswardprofilefortunegreen.pdf (accessed 03/14)

Figure 7.7: Change in transport modal share in Camden over time



- 7.10.4 Taking West Hampstead stations 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.¹⁵⁴ However, there are considered to be problems with congestion in some areas. Lack of parking has also been identified as a barrier to shopping in the area. It is felt that improved pedestrian and cycle routes could alleviate local congestion and bring shoppers into the area. In addition, improved transportation links to neighbouring town centres in Kilburn and Finchley Road could promote shopping in the wider area.¹⁵⁵
- 7.10.5 Significant improvements to the interchange area in West Hampstead are currently under way or planned, including a new Thameslink Station and streets upgrades to make pedestrian movement safer, more convenient and more attractive. However, there are still gaps and access to various transport modes is disjointed. The existing interchange and town centre are poorly connected with surrounding neighbourhoods. The railway lines divide West Hampstead and contribute to a lack of integration throughout the area. New and improved pedestrian and cycle links are believed to be potential solutions to this.¹⁵⁵
- 7.10.6 Improvements to cycling infrastructure are being supported by campaign and third sector groups seeking to see a reduction in the use of the boroughs canal tow paths by cyclists. Many cyclists are believed to use the canals as part of an east-west commute because the alternative routes are much more difficult to navigate.¹⁵⁶

¹⁵⁴ TfL (2014) TfL Planning Information Database [online] available at: <http://www.webptals.org.uk/> [online] accessed 03/14)

¹⁵⁵ LB Camden (2011) Shaping the future of the West Hampstead area – Consultation [online] available at: <http://www.ndpwesthampstead.org.uk/3Shaping%20the%20Future%20west%20hampstead%2026may2011.pdf> (accessed 03/14)

¹⁵⁶ FoE Camden (2013) Cycling and the canal [online] available at: <http://www.camdenfoe.org.uk/category/transport/> (accessed 03/14)

7.11 Water quality & 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.¹⁵⁷

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:¹⁵⁸

- 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 flooding¹⁵⁹. 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.^{160 161} West Hampstead experienced surface water flooding in 2002. The area around the Fire Station and Lymington Road are areas of particular concern, and the contributing 'catchment' in terms of roads leading to the location is large.¹⁶²

- 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.¹⁶⁰¹⁶¹

- 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 2011/12.¹⁶³

Water Use & 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 2 litres per person per day (l/p/d) higher than the London average of 164 l/p/d and 21l/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 7.8).¹⁶¹

¹⁵⁷ LB Camden (2011) Preliminary Flood Risk Assessment [online] available at: <http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/flho1211bvli-e-e.pdf>

¹⁵⁸ 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 04/13)

¹⁵⁹ LB Camden (2012) Surface Water Management Plan 'Drain London' [online] available at: http://www.camden.gov.uk/ccm/cms-service/download/asset/?jsessionid=D94BF9EFEE2E36A2074A2367A225FDA1?asset_id=2937557&bcsi_scan_E956BCBE8ADBC89F=1

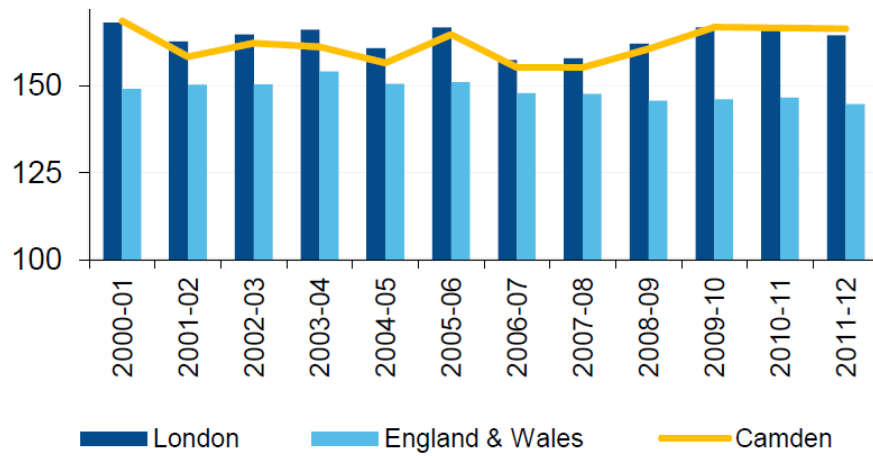
¹⁶⁰ LB Camden (2012) Euston AAP SA Scoping Report [online] available at: <http://www.eustonareaplan.info/wp-content/uploads/2012/09/Euston-Area-Plan-SA-Scoping-report-merged-19-09-2012.pdf> (accessed 03/14)

¹⁶¹ Environment Agency (2013) Camden: London Borough Environmental Fact Sheet [online] available at: http://www.environment-agency.gov.uk/static/documents/Research/Camden_2013.pdf (accessed 03/14)

¹⁶² 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 03/14)

¹⁶³ 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 7.8: 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 3 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?

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	<p>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.</p> <p>Ambient noise levels associated with traffic flows will be an issue locally</p>	<p>Contribute to an improvement of air quality</p> <p>Ensure that noise from existing and new developments and operations will not affect noise sensitive land uses</p> <p>Ensure new noise sensitive uses are not located near existing established noise generating uses</p>
Biodiversity	<p>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 Camden / North London scale.</p> <p>Access to nature is important from a biodiversity conservation perspective, i.e. there is a need to build appreciation of urban biodiversity.</p>	<p>Protect and enhance existing habitats and biodiversity and seek enhancements.</p> <p>Protect and enhance natural habitats in the area, particularly those associated with priority species</p> <p>Deliver targeted habitat creation, including through the provision of open space and green roofs.</p> <p>Protect and provide for the planting of more trees</p>
Climate change mitigation (non-transport related)	<p>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</p> <p>There is a nationally recognised need to encourage the movement of waste up the hierarchy</p>	<p>Promote designs that facilitate efficient use of energy and support the generation and use of renewable and low carbon energy</p> <p>Reduce the amount of waste requiring final disposal, including waste associated with the development process</p>

Topic	Key issues	Key objectives
Community and wellbeing	<p>Population growth is a significant issue in West Hampstead and Camden as a whole.</p> <p>There will be a marked increase in the elderly population.</p> <p>Camden's population is highly culturally and ethnically diverse</p> <p>Camden includes areas of relative affluence and deprivation, and this is reflected to some extent in the plan area.</p> <p>Crime consistently appears as a priority issue for residents and businesses</p> <p>There is a deficiency of open space in terms of accessibility of high quality usable open spaces and parks.</p>	<p>Promote healthy living through e.g. provision of walking, cycling and recreation facilities</p> <p>Help reduce levels of crime and fear of crime</p> <p>Ensure access to local shopping, community, and leisure facilities and access to quality open space including children's play space</p> <p>Tackle poverty and social exclusion</p> <p>Encourage development that facilitates social cohesion</p> <p>Encourage development opportunities in those areas in need of economic development</p> <p>Promote access to employment opportunities for local people</p> <p>Protect existing and provide for new education facilities to meet needs</p>
Economy	<p>Demand for housing development means that the pool of employment land has been eroded, and this trend is set to continue.</p> <p>Retail centres in West Hampstead remain vibrant.</p> <p>West Hampstead is set to be a future area of growth in the borough. It has been identified as an 'area for intensification' in the London Plan and a 'growth area' in Camden's LDF</p> <p>70% of West Hampstead residents are employed in managerial and professional roles, compared to 63% in Camden. In Fortune Green the percentage is lower, but still above the borough average at 67%. In 2011, 5% (611) of the population of West Hampstead and 6% (592) of the population of Fortune Green were long-term unemployed. This compares to 7% for Camden as a whole.</p>	<p>Support development in existing centres and ensure the health of town centres</p> <p>Encourage the retention and growth of existing, locally based industries and businesses</p> <p>Accommodate new and expanding businesses</p> <p>Encourage new investment in the local economy and promote development opportunities for employment</p> <p>Focus growth on Core Strategy retail growth areas and designated frontages within the retail hierarchy</p>
Heritage	<p>The West End Green Conservation Area falls within the NDP area, and there are numerous listed buildings.</p> <p>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.</p>	<p>Promote high quality and sustainable urban design which protects and enhances the historic environment</p> <p>Ensure enhancement of the public realm and local distinctiveness, taking into consideration the characteristics of the existing townscape and strategic views</p> <p>Ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value</p>
Housing	<p>The costs of buying or renting a home on the open market within Camden are amongst the highest in London.</p> <p>23% of Camden residents identify a lack of affordable housing as one of the three issues of most concern to them</p> <p>Rates of affordable housing completion have been well below the rates recommended in the assessment of housing need.</p>	<p>Promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>Increase the net supply of housing, including affordable housing</p> <p>Provide housing for people, particularly families, on low to moderate incomes</p> <p>Encourage development at an appropriate density, standard, size and mix</p>

Topic	Key issues	Key objectives
Landscape / townscape	<p>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.</p> <p>West End Lane forms the spine of the West Hampstead town centre. The area around the stations is viewed by many to be the 'gateway' to the neighbourhood.</p>	<p>Encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair</p> <p>Ensure efficient use of land through maximising densities where appropriate</p>
Transport	<p>According to data for the period 2006 to 2013, bicycles increased from 9% to 15% of the proportion of all traffic.</p> <p>The Public Transport Accessibility Levels of the NDP area are very high</p> <p>There are considered to be problems with congestion in some areas.</p> <p>Significant improvements to the interchange area in West Hampstead are currently under way or planned, including a new Thameslink Station and streets upgrades to make pedestrian movement safer, more convenient and more attractive. However, there are still gaps and access to various transport modes is disjointed.</p>	<p>Reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area</p> <p>Encourage development at locations that enable walking, cycling and/or the use of public transport</p> <p>Enhance permeability and encourage the provision of infrastructure for walking, cycling and/or the provision of public transport</p> <p>Encourage an increase in car free and car capped housing</p> <p>Guide significant travel generating developments towards areas with high public transport accessibility</p> <p>Locate significant travel-demand generating uses, including new housing, in areas with high public transport accessibility and local services.</p>
Water, flood risk and other climate change adaptation issues	<p>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.</p>	<p>Protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change</p> <p>Promote the sustainable use of water resources</p> <p>Require development that incorporates sustainable drainage</p> <p>Help to reduce the risk of flooding and increase flood resilience, including surface water flooding</p>

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
- 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)

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 (submission version) Plan has been informed by assessment of **alternatives** for the following policy issues:

- Building Heights
- Bridges
- Views
- Basement Development
- Conservation Areas

Reasons for selecting these policy issues

9.1.2 This list of policy issues was identified by the Neighbourhood Forum drawing on the findings of past consultation. These are all issues that are somewhat contentious locally, i.e. issues for which opposing views exist as to the most appropriate policy approach. Addressing contentious issues systematically, via consideration of alternatives, is a means of ensuring that the final policy approach is sufficiently justified.

9.1.3 Another consideration, when compiling the list of plan issues that should be a focus of alternatives assessment, was the list of issues flagged within the SEA ‘Screening Report’ prepared by Camden Council. Specifically, the Screening Report highlighted that –

- 1) The allocation of new sites (i.e. sites not allocated within the Camden Site Allocations DPD)¹⁶⁴ represents a key issue.
- 2) The policy approach to the Fire Station site allocation is a key issue, given its listed status.
- 3) For other site allocations the policy approach similarly represents a key issue, particularly where there is a desire to ‘go beyond’ the policy approach established by the Camden Site Allocations DPD and/or the site allocation includes a listed building.
- 4) Thematic / area-wide issues are ‘key’ where there is a desire to build significantly on that established by the Camden Core Strategy. In particular, key issues relate to basement development, building heights, open space and walking/cycling permeability.

9.1.4 With regards to (1), the Forum disagrees to some extent. It is the Forum’s view that the preferred approach to site allocations is firmly justified. The Forum has sought to allocate all sites where development is likely to take place during the lifetime of the Neighbourhood Plan, i.e. no potential development sites have been excluded.¹⁶⁵ **Boxes 9.1 and 9.2** give consideration to the preferred approach to site allocations, and explain why it is possible to justify this approach without having undertaken systematic assessment of site options.

9.1.5 Similarly, the Forum does not agree with (2) and (3). It is not felt that the policy approach for the Fire Station, or any other site, is so contentious that alternatives assessment is warranted. The preferred approach to site specific policy has developed through close consultation with stakeholders (as explained in the Consultation Statement), and no strategic alternatives have emerged that necessitate assessment. With regards to the Fire Station site, whilst this is a listed building, any reasonable option (i.e. any option that might in theory be considered) would involve on-going conservation.

¹⁶⁴ LB Camden (2013) Camden Site Allocations Local Development Document [online] available at

www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework--ldf/

¹⁶⁵ The situation is slightly different for Local Green Space designations, where the choice of which sites to allocate was driven by the varying levels of existing protection.

Box 9.1 An explanation of the preferred approach to site allocation within the Growth Area

The WHGA is identified as an 'Area for Intensification' in the London Plan, which refers to 'a significant inner London transport interchange'. The Camden Council Core Strategy plans for 1000 new homes and an additional 7000 square meters of commercial floor space to be provided here in the duration of the plan. The Camden Core Strategy seeks to encourage high density housing with schemes to be of 'excellent design quality' that 'sensitively consider the amenity of occupiers and neighbours' and the 'character and built form of their surroundings' with particular regard to existing residential communities, massing and building heights and neighbouring conservation areas. Given this policy background, the NDP has little leeway when it comes to the choice of sites to allocate.

Essentially, the NDP aims to supplement the policy framework for three sites (187-199 West End Lane; 156 West End Lane; and the O2 Centre car park) that are allocated by Camden Council's Site Allocations Document (September 2013), as well as allocate / set site specific policy for several other sites in the Growth Area that are likely to be developed.

187-199 West End Lane

Planning permission was granted in March 2012 for a large development on this site, consisting of seven blocks of flats between five and 12 storeys high, with 198 new homes; however significant and widespread concerns have been expressed by local residents and businesses about the height and density of this development and its impact on the area. As such, the NDP raises a number of key issues that it is hoped will be taken into account during development, e.g highlighting the need for traffic monitoring to ensure that the aims of 'car free development' status are achieved.

156 West End Lane

It is appropriate for the NDP to supplement the existing policy framework for this site, as there are particular issues and sensitivities that the Forum believes should be formally recognised. A good mix of uses (e.g. to include offices for small, micro and start-up businesses, and a community meeting room) is seen as important, and the NDP also seeks to specify design (red brick), height (five-storey, unless it can be demonstrated that there is no impact on the Conservation Area) and infrastructure (improvements to the Potteries path) measures. The NDP also suggests that opportunities for a pedestrian bridge over the railway line to the O2 Centre should be 'investigated', and identifies a number of options that should be explored if it is the case that the builders' merchant, Travis Perkins, is to remain on the site.

O2 Centre car park

Again, it is appropriate for the NDP to supplement the existing policy framework for this site, as there are particular issues and sensitivities that the Forum believes should be formally recognised. Key considerations relate to the balance of housing vs. other uses; height, bulk and massing of any new buildings (with the NDP simply highlighting the need to respect, and be sensitive to, the height of existing buildings in the immediate vicinity); layout (with the NDP suggesting that there could be the potential to move the existing Homebase store, and also incorporate the sites currently occupied by the two neighbouring car show rooms into any future redevelopment); design (with the NDP stating that the 'highest quality' is expected); public transport infrastructure (with the NDP specifying that there should be improvements and capacity expansion at the Underground stations); open space (deficiencies should be addressed, and the NDP suggests how this might be achieved); community facilities (development should seek to address deficiencies, and should possibly provide space on-site for a new primary care health facility); public realm (the NDP specifies a need for improvements); and pedestrian and cycle links (the NDP specifies that development shall provide improved links between West End Lane and Finchley Road). The NDP also identifies that 'there is an opportunity to investigate opportunities for a new north-south pedestrian link, including new crossings over the railway lines'.

Blackburn Road

Consultation has highlighted widespread concern about the street environment of Blackburn Road, with complaints about litter, dumping and a perception that it was a neglected and unsafe area. The NDP responds to identified issues by specifying that once developments are completed, proposals should be brought forward by Camden Council for a review of access to this road. The NDP goes on to highlight that a preferred approach would be for a route giving priority to pedestrians and cyclists - as part of a wider scheme to provide an improved traffic-free route between West End Lane and the O2 Centre/Finchley Road. The NDP also specifies that residential developments on this road should be classified as car-free; contribute towards improvements in public transport facilities locally; contribute to new green/open space; provide new trees; provide an improved public realm and streetscape; and contribute to community facilities in the immediate area. In terms of the specific development sites on Blackburn Road, the NDP specifies the following:

- 14 Blackburn Road - whilst the existing planning permission is valid, if it transpires that a new application must be submitted then it should be for a scheme that is primarily residential (to include appropriate affordable housing), with employment use (office and/or retail would be preferred) on the ground floor. Health, education, or community uses would also be considered appropriate. The NDP also suggests several other issues that might be reflected in any application.
- Asher House (and neighbouring land) - Any new building on this site should be lower in height than the student block - to take into account the change in ground levels on Blackburn Road - and respect the character of the immediate area, following the alignment of roof lines on West End Lane. A range of uses could be considered for this site including business/commercial; retail/hotel; residential (including affordable housing) and health/education/community uses. Employment use would be preferred on the ground floor (in line with the principles set out in the above paragraph).

Box 9.2 An explanation of the preferred approach to site allocation – outside the Growth Area

The Liddell Road Industrial Workshop site allocation

This site, which is to the west of the Growth Area, is identified by Camden Council as a candidate site to locate a primary school. Redevelopment at the site potentially can provide for a school as well as a mix of uses, and so the NDP is compelled to allocate the site for this use. However, it is recognised that a draw-back relates to the loss of employment land, given that the site consists of 33 single light industrial units. The Camden CS seeks to promote a successful and inclusive economy in the borough and aims to 'safeguard existing employment sites' and provide 'a mix of employment facilities and types'. Furthermore, the West Hampstead Place Plan¹⁶⁶ states that 'a mix of employment space is important' and that there is 'a desire for small businesses to be able to stay in the area'.

Conservation Area site allocations

The West Hampstead Fire Station is located within the West End Green Conservation Area, with the West Hampstead Police Station site adjacent to the Conservation Area. The West End Green Conservation Area Appraisal and Management Strategy (2011) recognises the development pressure on this area of protected Victorian and Edwardian built heritage. The Grade II listed Fire Station and Firemen's Cottages is a cultural asset that provides a 'village feel' to the area, with the Appraisal and Management Strategy stating a need to 'preserve or enhance the character or appearance' reflecting the 'materials, colour palette, scale and character of the area'. As such, the proposed strategy is to implement an 'Article 4 Direction' on control over development. The ENO Rehearsal Rooms is similarly allocated in order to retain its cultural significance, with any development to respect its Conservation Area location.

Open space and greenspace site allocations

The open space site identified at Gondar Gardens Reservoir presents an opportunity to continue the street's frontage, the gardens open space being in private ownership. Camden Council Core Strategy (Policy CS15) seeks to protect and improve Camden's parks and open spaces to tackle deficiencies and to meet increased demand for open space in growth areas; and the West Hampstead area is identified in the Core Strategy as an area deficient in public open space. The allocated development site of Fortune Green Play Centre is similarly proposed as a designated local community asset that affords views of open space.

15 existing areas of green space are designated as 'Local Green Space'. The sites are all included in Camden Council's LDF Proposals Map (2010), and hence the decision on which sites to allocate is firmly evidence-based. The preferred approach has, however, been amended to reflect issues raised through consultation (see Consultation Statement).

Other site allocations

The Mill Lane and Iverson Road allocated sites contain a mix of residential styles and mixed retail / business / commercial uses and all located on the edges of neighbourhood centres. The allocated sites together will achieve a specific purpose, and no other reasonable site options exist.

Similarly, the sites allocated on Maygrove Road will together achieve a specific purpose, and it is not felt that other reasonable site options exist. However, it is recognised that a sensitivity relates to the adjacent three storey London Stock terraced housing. While the area is not designated as a Conservation Area, there is a need for development to complement local character and building height with respect to views of the limited leafy open space in the area.

The Finchley Road site allocation is somewhat contentious in that it is located directly between two conservation areas. However, it is felt that allocation is justified. Development will have regard for the position between the two protected areas, and the design and building heights of the immediate vicinity.

Structure of this part of the Environmental Report

9.1.6 Each of the five thematic policy issues listed above (i.e. those that warrant systematic consideration via assessment of alternatives) is assigned a chapter, below. Within each chapter, the following questions are answered:

- What are the reasons for selecting the alternatives dealt with?¹⁶⁷
- What are the assessment findings (in relation to the set of alternatives in question)?
- What are the Forum's reasons for selecting the preferred approach in-light of assessment?

9.1.7 These questions reflect the regulatory requirement for the Environmental Report to present 1) assessment findings for reasonable alternatives and 2) 'an outline of the reasons for selecting the alternatives dealt with'.

¹⁶⁶ LB Camden (2012) West Hampstead: Shaping the Future, A plan for the wider West Hampstead area [online] available at <http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/place-plans/-west-hampstead/>

¹⁶⁷ The headings reflect the regulatory requirement for the Environmental Report to present 1) assessment findings for reasonable alternatives and 2) 'an outline of the reasons for selecting the alternatives dealt with'.

10 BUILDING HEIGHTS

10.1 Outline reasons for selecting the alternatives dealt with

10.1.1 The issue of building heights is significant in the West Hampstead area given the need to maintain the setting of valued heritage assets. From a heritage perspective, there is a need to take a conservative approach to building heights; however, from an economic perspective there can be merit to tall buildings.

10.1.2 The following alternatives were subjected to assessment -

- Option 1)** Outside the growth area, new development should be no higher than existing buildings in their immediate vicinity, whilst within the growth area the height of new buildings will need to have regard to their impact on the setting of the two immediately adjacent conservation areas.
- Option 2)** Development across the NDP area should be no higher than six storeys in line with the predominantly low-rise character of existing buildings. The height of new buildings shall fit in with the rooflines of existing buildings in their immediate vicinity.
- Option 3)** A more flexible approach should be taken across the plan area, with an acceptance that tall buildings will become more prevalent.

10.1.3 It is considered that these are ‘the reasonable alternatives’ in relation to the issue of building heights. Testing these alternative approaches enables consideration of the wider sustainability considerations around the issue of building heights.

10.2 Summary assessment findings

10.2.1 The box below presents summary assessment findings. Detailed assessment findings can be found within Appendix III.

Option 1 policy for Building Heights would lead to **significant positive effects** in terms of the economy and employment on the basis that it would support the objectives of the West Hampstead Growth area. Option 1 provides for strategic housing in line with the quantum allotted in spatial plans (Camden CS & London Plan), and would also lead to notable climate change mitigation benefits given high housing density near to a public transport interchange. **Option 2** is unlikely to deliver as many notable positive effects as Option 1. **Option 3** would allow for an increase in housing on all allotted sites, but can be considered unsustainable in terms of other objectives, with **significant negative effects** predicted in terms of heritage.

10.3 Outline reasons for selecting the preferred approach in-light of alternatives assessment

10.3.1 The preferred approach bears resemblance to Option 1, although it is slightly more flexible in that for sites outside the Growth Area the preferred approach does not involve specifying that buildings should be no higher than existing buildings in their immediate vicinity (instead specifying that there is a need to respect and be sensitive to the height of existing buildings in their vicinity and setting).

10.3.2 The preferred approach has emerged over time in-light of consultation. At the time of the Draft (Pre-submission) Plan / Environmental Report consultation in May 2014 the preferred approach bore close resemblance to Option 1, i.e. there was a reference to buildings outside the growth area not exceeding the height of neighbouring buildings.

11 BASEMENT DEVELOPMENT

11.1 Outline reasons for selecting the alternatives dealt with

11.1.1 The issue of basement development is significant in the West Hampstead area due to localised flooding from surface water attributed to local soil conditions and topography. Camden Planning Guidance (CPG4) states that the council will only permit basement and underground developments that do not: cause harm to the built and natural environment and local amenity; result in flooding; or lead to ground instability. Equally, there is a large demand for basement development and it can be suggested that it is a means of helping to ensure local housing needs are met.

11.1.2 The following alternatives were subjected to assessment -

- Option 1)** A presumption against basement development more than one storey deep or outside the footprint of the property. Development should not cause harm to the natural environment and local amenity; result in flooding; or lead to ground instability.
- Option 2)** A presumption against all basement development due to environmental constraints.
- Option 3)** A more flexible approach should be taken, with an acceptance that basements will become more prevalent. The scale of basement developments to be determined on a case-by-case basis.

11.1.3 It is considered that these are ‘the reasonable alternatives’ in relation to the issue of basement development. Testing these alternative approaches enables consideration of the wider sustainability considerations around the issue of basement development.

11.2 Summary assessment findings

11.2.1 The box below presents summary assessment findings. Detailed assessment findings can be found within Appendix IV.

The merits of **Option 1** relate to Climate Change mitigation, Community & Wellbeing, Housing, Landscape/Townscape, and Water and Flood Risk. **Option 2** has merits with respect to the built heritage of the plan area, while **Option 3** would be in-line with objectives relating to Economy and Housing. It is not possible to conclude significant positive effects, as the magnitude of any effect ‘on the ground’ (i.e. the scale of basement development that would occur under any option) is uncertain, and there is also confidence in the ability to address issues associated with basement development (e.g. flood risk) at the planning application stage.

11.3 Outline reasons for selecting the preferred approach in-light of alternatives assessment

11.3.1 Option 1 is the preferred approach as there are considerable potential problems with basement developments in the area, particularly around flood-risk. However it is not considered appropriate to ban all basement development - particularly as some basement developments have already taken place in the area. The Neighbourhood Plan seeks to take a balanced approach - highlighting the potential problems of such development, but allowing basement development to take place - albeit with appropriate restrictions in place.

12 BRIDGES

12.1 Outline reasons for selecting the alternatives dealt with

12.1.1 An increase in the scale of development within the West Hampstead Growth Area (and transport interchange) will require an upgrade in ‘access’ and ‘connectivity’ locally. In particular, there will be a need to improve links between the West Hampstead Growth area and immediate and wider area. However, given limited resources, there are alternative approaches that might be taken.

12.1.2 The following alternatives were subjected to assessment -

- Option 1)** New pedestrian bridges across the rail line to improve access across the area linking communities.
- Option 2)** New pedestrian and cycle links to connect the community to the transport interchange stations
- Option 3)** Widening of bridges over railway lines to accommodate the smoother movement of traffic (as well as enable walking/cycling connectivity).

12.1.3 It is considered that these are ‘the reasonable alternatives’ in relation to the issue of ‘bridges’. Testing these alternative approaches enables consideration of the wider sustainability considerations around the issue of bridges.

12.2 Summary assessment findings

12.2.1 The box below presents summary assessment findings. Detailed assessment findings can be found within Appendix V.

All options would support the targeted upgrading of access infrastructure in the West Hampstead Growth Area and hence lead to **significant positive effects** in terms of transport and associated air quality issues. Option 1, directed towards the linking of communities otherwise disconnected by a rail line has particular merits in terms of community and wellbeing objectives, while option 2 (focused on connectivity between the community and the wider area through sustainable transport modes) would lead to wider positive environmental, social and economic sustainability benefits. Option 3 has wider commercial economic merits for the local and wider area (e.g. delivery of freight), as well as providing for sustainable transport infrastructure through the interchange.

12.3 Outline reasons for selecting the preferred approach in-light of alternatives assessment

12.3.1 While Option 1 would be clearly supported by a majority of those living and working in the Neighbourhood Plan area, the NDF acknowledges the significant cost of new pedestrian bridges - and that imposing them as a condition of any development may not be viable. Noting the significant positive effects of all three options, the NDF would not like to rule out any of these options. The preferred approach is therefore to emphasise the need for all development in the area (particularly large developments) to maximise the space for pedestrians and cyclists - and to maximise the opportunities for improving existing pedestrian/cycling routes and providing new pedestrian/cycling routes.

13 CONSERVATION AREAS

13.1 Outline reasons for selecting the alternatives dealt with

13.1.1 The Neighbourhood Plan area contains a number of designated heritage assets, including listed buildings and a registered park and garden. The policy approach to Conservation Areas is a matter that is, in some respects, up for debate.

13.1.2 The following alternatives were subjected to assessment -

- Option 1)** A traditional approach to safeguarding and enhancing Conservation Areas and heritage sites, i.e.
 - A presumption in favour of development that enhances and conserves the character of neighbouring buildings, the historic significance of heritage assets, conservation areas and their settings.
 - A presumption against any proposals which are considered to detract from the special character, attractive and/or historic appearance and architectural and/or historic significance of Conservation Areas and other heritage assets in the Area.
- Option 2)** Keep Conservation Areas under review and investigate the merits of designating new conservation areas where residents demand them.
- Option 3)** The introduction of an Article 4 direction on all commercial and residential properties with imposition of an Area of Special Control of Advertisements in Conservation Areas.

13.1.3 It is considered that these are ‘the reasonable alternatives’ in relation to the issue of Conservation Areas. Although these options are not entirely mutually exclusive, testing these approaches enables consideration of the wider sustainability considerations around the issue of Conservation Areas.

13.2 Summary assessment findings

13.2.1 The box below presents summary assessment findings. Detailed assessment findings can be found within Appendix VI.

While all three options could be effective in terms of addressing the conservation principles for the area, the traditional approach under **Option 1** encourages a more ‘tried and tested’ approach. Commercial and residential development may flourish better under Option 1.

13.3 Outline reasons for selecting the preferred approach in-light of alternatives assessment

13.3.1 All three options are contained within the Neighbourhood Plan - highlighting the importance of heritage and conservation to the NDF. An approach which considers all three options is considered suitable and achievable.

14 VIEWS

14.1 Outline reasons for selecting the alternatives dealt with

14.1.1 Views across the area are known to add readily to the sense of well-being of experienced by the local community, as well as those who work in and visit the area.

14.1.2 The following alternatives were subjected to assessment -

Option 1) Development should presume in favour of protecting, preserving and enhancing existing green/open space and street views and the distinct character and appearance of the area, while providing new views and green/open space linking sites.

Option 2) Proactively support the existing ‘green corridors’ alongside railway lines.

14.1.3 It is considered that these are ‘the reasonable alternatives’ in relation to the issue of ‘views’. Although these options are not entirely mutually exclusive, testing these approaches enables consideration of the wider sustainability considerations around the issue of views.

14.2 Summary assessment findings

14.2.1 The box below presents summary assessment findings. Detailed assessment findings can be found within Appendix VII.

The retention of existing views and creation of new green/open areas to enhance views as supported by **Options 1 and 2** will lead to benefits in terms of climate change mitigation, biodiversity, community and wellbeing, and landscape/townscape character. **Option 1** has more beneficial effects with regard to the immediate residential and commercial environment in terms of heritage value and economy, and provision of greenways for sustainable transport. There are a myriad of benefits and merits in the creation of a network of green open spaces in the plan area in terms of mitigating against localised flooding, enrichment of biodiversity in an area, and the provision of space for residents of all ages to enjoy.

14.3 Outline reasons for selecting the preferred approach in-light of alternatives assessment

14.3.1 Both options are welcomed and are important to the NDF. It is considered that Option 1 would have the most benefit for the Area as a whole and for the most people, so this option is preferred. However, Option 2 is an important consideration for sites close to railway lines - so shouldn't be excluded from consideration.

PART 3

WHAT ARE THE SEA FINDINGS AT THIS STAGE?

15 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

15.1.1 This 'Part' of the Report presents the assessment of the Draft (Submission) Plan.

16 METHODOLOGY

16.1.1 The assessment identifies and evaluates 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability topics, objectives and issues identified through scoping (see Part 1) as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

- Air quality and noise
- Biodiversity
- Climate change mitigation (non-transport)
- Community and wellbeing
- Economy
- Heritage
- Housing
- Landscape / townscape
- Sustainable transport
- Water, flood risk and other climate change adaptation issues

16.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.¹⁶⁸ Because of the uncertainties involved there is inevitably a need to make assumptions.

16.1.3 Assumptions are made cautiously, and explained within the text.¹⁶⁹ The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

16.1.4 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.¹⁷⁰ 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.

Added structure

16.1.5 Although, under each topic heading, there is a need to focus on the effects of 'the plan' as a whole, it is helpful to break-up the assessment with the following sub-headings: Proposed spatial strategy; Proposed approach to site specific policy; Proposed approach to addressing thematic policy issues; The Plan 'as a whole'.

Further explanation of the SEA 'story'

16.1.6 Whilst the 'story' of plan-making / SEA up to this point is explained first and foremost in Part 2, above, it is also supplemented below. Specifically, several boxes are inserted into the assessment text to highlight instances of the current preferred approach having been developed in-light of past SEA recommendations, i.e. recommendations made within Part 3 of the Environmental Report published alongside the Draft (Pre-submission) Plan in May 2014.

¹⁶⁸ The implication being that it is difficult, if not impossible, to identify a 'cause-effect relationship' with any certainty.

¹⁶⁹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

¹⁷⁰ Environmental Assessment of Plans and Programmes Regulations 2004

17 AIR QUALITY AND NOISE

The sustainability objectives are to -

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

The proposed spatial strategy

- 17.1.1 The proposed growth strategy to concentrate growth primarily in the allocated 'West Hampstead Growth Area' has considerable merit with regard to improving air quality while protecting against extraneous noise from the mixed use nature of the allocated site affecting noise sensitive land uses such as adjacent residential development across the plan area.
- 17.1.2 The allocated sites of the West Hampstead Growth area are largely removed from residential areas due to being contained by road (A41 & B510) and rail infrastructure on all sides, creating a buffer against any additional noise coming from a new mixed use area. Development of this growth strategy will deliver a new mixed use area, with improved transport interchange accessibility and capacity, which includes improved pedestrian and bicycle routes.
- 17.1.3 An improved infrastructural interchange crossing at the West Hampstead Growth Area will aid air quality in the area by decreasing existing congestion in the area, while wider pavements for green infrastructure use will substantially contribute towards an improved street environment around public transport facilities. Development of allocated sites in the West Hampstead Growth Area will allow a decrease in car usage as the plan area's population expands.
- 17.1.4 Development at the 'Liddell Road Industrial Workshops' has the potential to reduce extraneous industrial noise and heavy goods day time vehicles from an otherwise residential area. Development at this allocated site risks the loss of an established employment site within the area.

Proposed approach to site specific policy

- 17.1.5 Site specific **Policy 4: West Hampstead Growth Area** promotes the greater use of the area for the plan's community by increasing space within the urban realm for pedestrian use creating an improved user friendly street environment across the West End Lane sites and the O2 Centre Car park site, while contributing to improvements to public transport (underground and overground) for the area. An increase in the use of public transport and provision of improved pedestrian and cycle routes around the new mixed use area and existing neighbourhood centre (between West End Lane and Finchley Road) will contribute to an improvement of air quality, decreasing noise levels while providing a busy mixed use centre and public transport hub. The allocation of sites close or adjacent to the West Hampstead growth area, such as those on Maygrove Road, will aid in the use of the public transport interchange and new mixed use resources.
- 17.1.6 Improvements to the West Hampstead Growth Area public realm include the provision of tree lined green corridors to open public space linked to green infrastructure pedestrian and cycle routes. **Policy 5: Other Sites** supports the provision of pedestrian/bicycle links to adjoining areas to provide integrated spaces, protecting existing green/open spaces while developing new green/open space. In light of the neighbourhood plans immediate proximity to public transport links all development at allocated sites is to encourage provision of green infrastructure with improvements to encourage public transport accessibility to reduce car dependency and consequently improve air quality.

The proposed approach to addressing thematic policy issues

Relevant policies:

- **Policy 1** (Housing); **Policy 6** (Public Transport); **Policy 7** (Roads); **Policy 8** (Cycling); **Policy 15** (Local Green Designation)

- 17.1.7 Residential development achieved through **Policy 1: Housing** shall provide a range of housing types, providing affordable, social and rent/buy housing, including provision of accessible homes for the elderly and disabled that is likely to reduce car dependency and increase use of public transport. The provision of homes allocated through the plan aims to exceed national environmental standards and meet the requirement for zero-carbon homes increasing air quality standards.
- 17.1.8 Public transport infrastructure supported by **Policy 6: Public Transport** sets due regard for development to allow for improvements to existing infrastructure. Proportional increases in future populations in the area are to provide for additional public transport particularly in and around the West Hampstead Growth Area. Measures are to be undertaken to increase the amount of space for pedestrians around all public transport facilities to allow greater access.
- 17.1.9 Measures to increase the quality of life in an area that suffers from bad air quality is supported by **Policy 7: Roads** whereby new developments are to encourage a reduction of car use while allowing for the smooth and safe movement of traffic on roads. This is to be realized through greater access to public transport, a widening of the bridges over railway lines, promotion of car free developments and areas, and provision of charging points and dedicated parking spaces for electric cars. New development should include specific measures to discourage residents from owning petrol/diesel cars, and to encourage use of electric cars.
- 17.1.10 The enhancement of cycling links and encouragement of cycling in the wider area is to be delivered through development supported by **Policy 8: Cycling**. Pedestrian access in the area is to be maximised, providing wider paths and pedestrian crossings to improve the existing network in the area, with additional crossings over railway lines to allow greater access to the constrained Growth Area. Development has been excluded on sites that are now listed under **Policy 15** to be designated as Local Green Space. This protection of green areas has high environmental value with regard to air quality, community amenity, and biodiversity for the area. The important relationship the natural environment has on the health of communities is further supported by **Policy 16** which protects urban green spaces and appropriates resources through new development to maintain new green spaces for the ongoing health of communities.
- 17.1.11 The protection planting of new trees under **Policy 17** will further bolster the landscaping of an area to further increase the quality of air in the region while contributing to the overall character of an area. The planting of trees aids an area in adapting to and mitigating climate change effects partially caused by poor air quality.

The Plan as a whole

- 17.1.12 Development of the preferred allocated sites at the West Hampstead Growth Area will provide for significant measures to provide greater green infrastructure and pedestrian access, given plans for an enhanced transport interchange. The effect should be to reduce traffic locally, possibly with beneficial effects for air quality within the designated as an 'Air Quality Management Area'. The 'significance' of any effects is, however, uncertain.

18 BIODIVERSITY

The sustainability objectives are to -

- To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.
- Protect and enhance natural habitats in the area, particularly those associated with priority species
- Deliver targeted habitat creation, including through the provision of open space and green roofs.
- Protect and provide for the planting of more trees

The proposed spatial strategy

18.1.1 While the plan area is largely urban, pockets of green space exist to a limited extent. The growth strategy largely allocates brownfield land to deliver development with regard to the limited natural environment. In light of the wider Borough Area being designated as an Air Quality Management Area development is to take account of the climate change mitigation relationship it can have with the natural environment. Development is to provide for new green/open space, the planting of trees and the provision of integrated green infrastructure. These measures promote biodiversity and nature conservation, creating green corridors and a healthy area for sustainable growth.

18.1.2 Sites within the West Hampstead Growth Area are largely brownfield with the exception of the Midland Crescent railway embankment. While this growth area is identified in the London Plan as an ‘Area for Intensification’, development on railway embankments will significantly reduce existing habitats and biodiversity in an increasingly urban environment. While development at allocated sites is to provide for an integrated network of green spaces, allocated sites such as the Gondar Garden site are located directly adjacent to the locally designated Gondar Gardens Site of Nature Conservation Importance. The designation prescribes that development should take place at these locally important sites of biodiversity only in very special circumstances.

Proposed approach to site specific policy

18.1.3 The West Hampstead Growth Area mixed use area, which includes housing, employment and community uses, is to provide through **Policy 4** additional green/open public spaces with new trees and green corridors. Development at allocated sites is to provide for an integrated green infrastructure network for community amenity, pedestrian and cycle routes, while enhancing and safeguarding existing views across the area.

18.1.4 Allocated sites, brought forward during the lifetime of the plan, under **Policy 5** are to safeguard existing green spaces while new development is to incorporate new green spaces. **The Local Green Space designation** of Gondar Gardens supported by **Policy 15** prescribes that any development risking loss of natural habitats in the area must be for significant reasons. Local Green Space designations drawn from *Camden Council’s Local Development Framework Proposals Map (2010)* have a high environmental value and provide important benefits to the biodiversity of the area. The protection of Local Green Space such as the public open space of ‘Maygrove Peace Park’ and the ‘Maygrove Open Space’ provide important access for local communities to biodiversity while providing local green open space for allocated sites at Maygrove Road.

The proposed approach to addressing thematic policy issues

Relevant policies:

- **Policy 15** (Local Green Designation); **Policy 16** (Green/open space)

18.1.5 The designation of Local Green Spaces through **Policy 15** will lead to biodiversity benefits. Development other than in very special relevant circumstances will not be permitted leaving open spaces to act as important biodiversity corridors and valued strategic views, such as along railway embankments.

18.1.6 The protection and provision of green open space is supported by **Policy 16** which addresses the lack of open space in the area, the offsetting of any loss of green space, the provision of pocket parks and active green spaces, and the appropriate provision of green corridors through existing streetscapes to foster a positive impact on the relationship between urban and natural features. **Policy 17** provides for the maintenance of existing trees and the planting of new trees to contribute to the overall character of the area with regard to their natural role in terms of the natural environment.

18.1.7 **Recommendation:** Policy 2 (Design & Character) should make reference to the existing natural heritage and the potential for new development to contribute, e.g. through tree planting and other landscaping work.

[The Plan as a whole](#)

18.1.8 The enrichment of biodiversity in the plan area can be delivered through the proposed growth strategy by conserving open green areas, maintaining the natural heritage of the urban environment and by creating green corridors in high quality urban realms in line with green infrastructure linking areas. Landscaping and the planting of trees in new green spaces will have beneficial effects on the built environment, increasing biodiversity within the plan area. Significant effects are, however, unlikely.

19 CLIMATE CHANGE MITIGATION (NON-TRANSPORT RELATED)

The sustainability objectives are to -

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

The proposed spatial strategy

19.1.1 The proposed growth strategy will support climate change mitigation objectives, particularly through a focus on upgrading sustainable movement opportunities and green infrastructure in line with a significant increase in growth to the West Hampstead Growth Area. The spatial strategy proposes the addition of green open spaces and ecological corridors to combat poor air quality, increase biodiversity in the area, and to encourage pedestrian and cycling network usage in the plan area. The plan seeks to designate Local Green Spaces in line with many of the allocated development sites.

Proposed approach to site specific policy

19.1.2 Site specific policy does not specify energy or waste policy for existing or new development.

The proposed approach to addressing thematic policy issues

Relevant policies:

- **Policy 1** (Housing);

19.1.3 Residential development to be delivered in accordance with **Policy 1** is to provide homes which aim to exceed national environmental standards and meet the requirement for zero-carbon homes. Developments are to aim to reduce greenhouse gas emissions and support energy efficiency where possible. Measures to retrofit existing buildings to bring them up to sustainable energy standards are to include recycling bins to reduce final waste disposal capacities.

19.1.4 West Hampstead Growth Area policy (**Policy 4**) requires that developers seek to: “incorporate climate change mitigation measures in all schemes, with the aim of setting a precedent for the wider area.” This is an ambitious approach, and one that should hopefully encourage cooperation between individual developers / site promoters.

The reference to climate change mitigation within Policy 14 reflects the following past (May2014) SA recommendation: “*Reflect climate change mitigation considerations within the neighbourhood plan policy areas of ‘Business, Employment & Economic Development’, and ‘Housing’ and ‘Design’. Consider requiring a more stringent approach within the West Hampstead Growth Area, which has the potential to set a precedent for the wider area.*”

The Plan as a whole

19.1.5 Sustainable design and construction / renewable energy / sustainable waste management is not set to be a major focus of the plan, but it is noted that policy is in place that should have the effect of encouraging scheme promoters to take an ambitious approach to CO₂ minimisation within the West Hampstead Growth Area.

20 COMMUNITY AND WELLBEING

The sustainability objectives are to -

- Promote healthy living through e.g. provision of walking, cycling and recreation facilities
- Help reduce levels of crime and fear of crime
- Ensure access to local shopping, community, and leisure facilities and access to and enhancement of open space including children’s play space
- Tackle poverty and social exclusion
- Encourage development that facilitates social cohesion
- Encourage development opportunities in those areas in need of economic development
- Promote access to employment opportunities for local people
- Protect existing and provide for new education facilities to meet needs

The proposed spatial strategy

20.1.1 The proposed spatial growth strategy allocates housing and services within a new mixed use area in the West Hampstead Growth Area which includes access and capacity improvements to major public transport infrastructure. Development at this new mixed use area with respect to the existing town centre will significantly contribute to public and community facilities in the area and bring improvements to meet the needs of the growing population. The West Hampstead Growth Area allocated sites will provide a significant quantum of affordable housing, with development schemes in the growth area expected to contribute to improved interchange accessibility and capacity with improved pedestrian and bicycle movement.

Proposed approach to site specific policy

20.1.2 **The West Hampstead Growth Area** through **Policy 4** shall be promoted for a mix of uses, including new housing, employment, community facilities. A mix of housing tenures will include a high proportion of affordable homes, with plans to include space for business and employment uses. The growth area is to provide capacity for significant public facilities, including community, health and education uses, with improvements to be made to the area’s public transport, especially the underground and overground stations. An improved street environment for pedestrians and cyclists will provide for more green/open space, as well as new trees and green corridors, cycling routes and pedestrian pavements.

20.1.3 Proposed growth at allocated sites outside and adjacent to the West Hampstead Growth Area supported by **Policy 5: Other Sites** will provide for and support community facilities, including education and health, in the immediate area. Existing employment floorspace and viable businesses are to be supported and retained or increased on redevelopment. Existing green/open space is to be retained with provision set for new green/open spaces. Integrated spaces are to be linked with pedestrian and cycling routes.

20.1.4 Development in the **West Hampstead Town Centre** is to enhance and retain through **Policy 12 a Town Centre** with a diverse range of shops and businesses in keeping with the village character setting of the surrounding built heritage and conservation areas. Proposals for independent shops and businesses, including affordable rents and business rates, are to be supported. This encourages to retention of independent local businesses, while providing employment opportunities for local people.

20.1.5 The retention of services, ground floor retail and business spaces are to be supported in **Policy 13: Mill Lane Neighbourhood Centre** from conversion to residential use. The character of this neighbourhood centre to be enhanced through restoration of shopfronts to encourage the development of new businesses, including cafés and restaurants, which are likely to increase footfall in the area. **Policy 14** supports development that protects and enhances the character of the **Fortune green Road Neighbourhood Centre** that provides for a range of shops and businesses to attract similar future economic activity to the area.

20.1.6 Finally, the strategic allocation of the Liddell Road site for a primary school will provide for the education needs of a growing population. A lack of primary school places has been identified in the West Hampstead part of Camden Borough.

[The proposed approach to addressing thematic policy issues](#)

Relevant policies:

- **Policy 1** (Housing); **Policy 2** (Design & Character); **Policy 6** (Public Transport); **Policy 7** (Roads); **Policy 8** (Cycling); **Policy 9** (Pavements & Pedestrians); **Policy 10** (Public & Community Facilities); **Policy 11** (Business, Commercial and Employment Sites); **Policy 16** (Green/open space)

20.1.7 Residential development is to be achieved through **Policy 1** to provide for a range of housing types and needs, including affordable, social and rent/buy housing. An appropriate provision of homes to promote accessibility for the elderly and disabled are to be delivered.

20.1.8 Development which is human in scale is to be supported through **Policy 2**, in order to create a positive relationship between buildings and street level activity. Views are to be protected in line with an associated high quality public realm to enhance the attractiveness of the area.

20.1.9 Development shall support through **Policy 6** significant improvements to public transport access and infrastructure, with proportional additions to be made to infrastructure as the area grows, with particular focus on the West Hampstead Growth Area's transport interchange. Measure to promote a reduction in car use encouraged by **Policy 7** will provide for a pedestrian friendly environment, an increase in air quality, and opportunities for improved provision for cycling promoted by **Policy 8** throughout the area.

20.1.10 Pedestrian access is to be maximised in the area in accordance with **Policy 9**, particularly in the West Hampstead Growth Area, with regard to pavement space and additional crossings over railway lines. The existing network of paths is to be improved to allow greater accessibility for disabled users and those with push chairs.

20.1.11 A broad range of public, social and community facilities are to be supported by **Policy 10** to meet the needs of a diverse and growing population. Primary and secondary school provision is to be provided in line with increased population growth to the plan area. A primary health care centre is to be located in or near the West Hampstead Growth Area. The West Hampstead Library facilities and building is to be protected under the plan. Existing and new community centres and the range of services they provide are to be improved upon.

20.1.12 **Policy 11** supports development in the plan area that allows for economic growth and employment while protecting existing employment sites and jobs or an offsetting with an increase in redeveloped floorspace delivered. The development of additional and new business space is to provide for a mix of different sized units, such as smaller spaces for micro-businesses, studio space, and pop-up shops and services. The provision of affordable or subsidised business space, similar to affordable housing, is required.

20.1.13 Green open spaces are to provide for outdoor leisure facilities in accordance with **Policy 16** such as playgrounds, gyms and recreational spaces. New pocket parks and active green spaces are to be provided in areas of new development.

[The Plan as a whole](#)

20.1.14 The proposed spatial distribution of growth shall deliver significant benefits for the wellbeing of the community, creating a new mixed use area with public and community facilities and services. The effect of the neighbourhood plan will be to ensure a pedestrian friendly urban realm with greater access to public transport to the wider area. Employment sites are to be protected in existing commercial areas, with potential for considerable investment in additional floorspace at the West Hampstead Growth Area. Allocated sites within the growth area are to provide for a substantial amount of affordable housing. These policy measures have **significant positive effects** in terms of promoting a healthy community locally.

21 ECONOMY AND EMPLOYMENT

The sustainability objectives are to -

- Support development in existing centres and ensure the health of town centres.
- Encourage the retention and growth of existing, locally based industries and businesses.
- Accommodate new and expanding businesses
- Encourage new investment in the local economy and promote development opportunities for employment
- Focus growth on Core Strategy retail growth areas and designated frontages within the retail hierarchy

[The proposed spatial strategy](#)

21.1.1 The proposed spatial strategy performs favourably in terms of ‘economy and employment’ creating a new mixed use area at a major transport interchange in the designated ‘Area of Intensification’ West Hampstead Growth Area. Allocated sites immediately outside of the growth area are consequently likely to prosper as a result of an increase in footfall through the area with respect to the immediate expansion in population to the area as a result of allocating the site for housing and economic growth. Development will promote and support a successful local economy, protecting and supporting existing jobs and employment sites – as well as providing new jobs and attracting new businesses to the area. The protection and enhancement of the economic role of the West Hampstead Town Centre and Mill lane Neighbourhood Centre allows the existing urban centres to retain their economic function while enhancing their distinctive attractive character.

[Proposed approach to site specific policy](#)

21.1.2 The **West Hampstead Growth Area** will significantly encourage new investment in the local economy and promote development opportunities for employment by providing adequate retail and business employment space in accordance with **Policy 4**. The **West Hampstead Town Centre** is to provide for a diverse range of retail, food/drink and commercial premises to be achieved through **Policy 12**, which is to encourage and support independent shops and businesses.

21.1.3 Existing urban centres such as the **Mill Lane neighbourhood Centre** and the **Fortune Green Road Neighbourhood Centre**, supported by **Policy 13** and **Policy 14**, respectively are to be retained with development to enhance the commercial uses and character of the neighbourhood centres to attract further commercial investment and activity. There is a presumption in favour of improving and restoring the look of shop-fronts, with a presumption against the conversion of ground floor retail/business use into residential use. **Other allocated sites** supported by **Policy 5** are also to ensure the level of employment floorspace is maintained or increased on redevelopment. Allocated sites such as the The Grade II listed **West Hampstead Fire Station** and nearby **Hampstead Police Station** are unique functionally historic buildings that can accommodate commercial activity on the ground floor with residential use on the upper floors. The plan encourages the reuse and sympathetic development of the town centre.

[The proposed approach to addressing thematic policy issues](#)

Relevant policies:

- **Policy 11** (Business, Commercial and Employment Sites)

21.1.4 The economic growth and employment potential of town centres and neighbourhood centres are rigorously supported by **Policy 11** which aims to safeguard existing employment sites and jobs while ensuring that redevelopment of such sites proposes an increase in floorspace or equivalent offsetting elsewhere in the plan area. The provision of additional and new business space is to be flexible for a range of different sized units, particularly smaller spaces for micro-businesses and studio space with requirements for affordable or subsidised space (equivalent to affordable housing provision).

The Plan as a whole

- 21.1.5 The increase in additional commercial floorspace in the West Hampstead Growth Area will accommodate new and expanding businesses, thus helping to ensure that the local and wider economy continues to thrive. The Neighbourhood Plan will help to ensure that existing employment and business sites are retained (especially at ground floor level), support flexible space for small independent micro-businesses to prosper in the neighbourhood centres and conservation areas, safeguard shop-fronts and in other ways help to make streets more attractive places for business. Many of the key decisions have been made at a higher level (i.e. through the London Plan, Camden Core Strategy and Camden Site Allocations Plan), but it is clear that the NDP itself will also have a positive effect, i.e. help with the achievement of sustainability objectives.

22 HERITAGE

The sustainability objectives are to -

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

The proposed spatial strategy

22.1.1 The proposed spatial strategy to concentrate growth primarily in a new mixed use area in the West Hampstead Growth Area presents the opportunity to promote a high quality urban environment which will safeguard the historic environment of the plan area against undue development pressure. Development will be of a high-quality design and will need to fit in with the existing style of the plan area, large parts of which are covered by Conservation Areas. The concentration of growth in the allocated sites of the **West Hampstead Growth Area** allows for more prescriptive policies to be set to enhance sympathetic development at allocated sites in and closer to Conservation Areas such as those in **West End Lane (187-199 West End Lane and 156 West End Lane)**. While the West End Lane sites are part of the West Hampstead Growth Area, their immediate location close to a Conservation Area set a design precedent in the area to develop buildings that reflect the design of the neighbouring conservation area.

Proposed approach to site specific policy

22.1.2 The **West Hampstead Growth Area** shall be promoted through **Policy 4** to become a mixed use area with streets that are in keeping with the character of the wider area and the two adjoining conservation areas, enhancing and safeguarding views of and across the area. The improved street environment is to provide an increase in green/open space that is to include trees and green corridors.

22.1.3 Allocated sites supported by **Policy 5: Other Sites** for development within the plan period are to complement the character of neighbouring buildings, particularly those sites in or adjacent to Conservation Areas. Development is to respect the height of neighbouring buildings in the immediate vicinity and to follow existing building lines. Buildings considered of poor quality with respect to the neighbouring conservation area at the allocated site of **156 West End Lane** have the opportunity upon redevelopment to take into consideration the distinctive built characteristics of the existing townscape.

22.1.4 Development within the **West Hampstead Town Centre** is to presume in favour of protecting and enhancing the character of the new and existing townscape through **Policy 12** which places controls on providing a diverse range of retail, food/drink and commercial outlets, with any associated signage, adverts and forecourt development to have due respect for the surrounding townscape and Conservation Areas. All development should enhance the public realm to improve the look and character of the immediate area in keeping with the adjacent Conservation Areas. Development at the **Finchley Road** allocated site has an opportunity to show greater awareness of its position between two Conservation Areas and give greater consideration to the character of the streetscape.

22.1.5 Development (including changes of use) within the **Mill Lane Neighbourhood Centre** shall protect and enhance the character of the Neighbourhood Centre in accordance with **Policy 13** providing for a diverse range of shops and businesses that presume in favour of improving and restoring the look of shopfronts. There shall be a presumption against the conversion of ground floor retail/business space into residential use, as there likewise shall be at the **West Hampstead Fire Station** and **Police Station** allocated sites. **Policy 14** further supports the protection and enhancement of the retail street and neighbourhood centre character of **Fortune Green Road Neighbourhood Centre**.

The proposed approach to addressing specific policy issues

Relevant policies:

- **Policy 2** (Design & Character); **Policy 3** (Safeguarding and enhancing Conservation Areas and heritage sites); **Policy 15** (Local Green Space designation)

- 22.1.6 **Policy 2: Design & Character** presumes that all development shall be of a high quality of design to complement and enhance the distinct local character and identity of the plan area, positively interfacing with the streetscapes, existing buildings and structures in which it is located. Development is to have due regard for the form, function, structure and heritage of the area with regard to scale, mass, orientation, pattern and grain of surrounding buildings, streets and spaces.
- 22.1.7 **Policy 2** sets to safeguard the heritage of the area by presuming in favour of a colour palette which reflects, or is in harmony with, the red brick and London stock brick of existing buildings. Extensions are to be in keeping with character and proportions or their settings with a presumption against basement development more than one story deep or outside the footprint of the property. Development must provide for associated high quality urban realm, protecting the views across the area.
- 22.1.8 The **Safeguarding and enhancing of Conservation Areas and heritage sites** supported by **Policy 3** presumes in favour of development that enhances and preserves Conservation Areas and heritage sites. There shall be a presumption against any proposals which are considered to detract from the special character, attractive and/or historic appearance and architectural and/or historic significance of Conservation Areas and heritage sites in the area.
- 22.1.9 The conservation and enhancing of the natural heritage of the plan area is supported by **Policy 15: Local Green Space designation** which sets open/green space designations for valued local greens, gardens, nature reserves, cemetery, parks, railway embankments and open spaces. Development is to protect existing and new green/open space in accordance with **Policy 16: Green/open space** having a positive impact on the relationship between urban and natural heritage features.

The Plan as a whole

- 22.1.10 There is an emphasis on ensuring that development within the West Hampstead Growth Area is sensitive to the character of neighbouring conservation areas, although it is recognised that some risks remain that will need to be the focus of ongoing monitoring and evaluation. More broadly, support for sensitively designed residential and commercial development, as well as open space and green space, should help to maintain the 'vitality' of the area and hence support appreciation of local character and heritage. **Significant positive effects** are predicted.

23 HOUSING

The sustainability objectives are to -

- Increase the net supply of housing, including affordable housing
- Provide housing for people, particularly families, on low to moderate incomes
- Encourage development at an appropriate density, standard, size and mix

The proposed spatial strategy

23.1.1 The growth strategy for the neighbourhood plan primarily concentrates on delivering a significant quantum of housing with community facilities within a new mixed use area in the West Hampstead Growth Area. Development will provide a range of housing and housing types, including social and affordable housing, as well as housing suitable for families, old people and young people. Development is to respect the character, form, density and scale of nearby housing and Conservation Areas, while creating a new mixed use area in the **West Hampstead Growth Area** allocated sites that provides a diverse commercial offering connected to the immediate area through green infrastructure (pedestrian and cycling routes) and to the wider area through an upgraded public transport interchange.

Proposed approach to site specific policy

23.1.2 In accordance with **Policy 4: West Hampstead Growth Area** a high proportion of affordable homes is to be provided within the allocated quantum of housing for the plan area.

23.1.3 Outside of the Growth Area **Policy 5: Other Sites** allocates sites for housing that are to complement existing development with regard to the character and height of neighbouring buildings. In particular development at the **West End Lane** and **Finchley Road** allocated sites is to respect appropriate density, form, height and mix of the surrounding streets.

The proposed approach to addressing specific policy issues

Relevant policies:

- **Policy 1** (Housing); **Policy 2** (Design & Character); **Policy 3** (Safeguarding and enhancing Conservation Areas and heritage sites); **Policy 13** (Fortune Green Road Neighbourhood Centre);

23.1.4 Residential development is to provide a range of housing in accordance with **Policy 1: Housing** for affordable, social and rent/buy needs. A range of different unit sizes are to be delivered, including provision for the elderly and disabled which promote accessibility.

23.1.5 The **Design & Character** of residential development supported by **Policy 2** is to be human in scale and have regard for form, function, structure and heritage of place. Development must positively interface with the existing scale, mass, orientation, pattern and grain of surrounding buildings, streets and spaces. Development is to provide an associated high quality urban realm to enhance the distinct local character and identity of the area.

23.1.6 Change of use to residential development is discouraged in Conservation Areas and heritage sites under **Policy 3** and **Policy 13** to retain the existing streetscape character of the area.

The Plan as a whole

23.1.7 The proposed growth strategy to provide substantial housing in the plan area delivers a significant quantum of affordable housing, catering for a range of unit sizes and people’s needs. Housing is primarily located within the West Hampstead Growth Area, with selected allocations at sites outside this new mixed use area. The distinctive character of the area and proximity to Conservation Areas will encourage an appropriate form, density, and scale of residential growth. The plan is supportive of housing growth and hence should lead to **significant positive effects**.

24 LANDSCAPE / TOWNSCAPE

The sustainability objectives are to -

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

The proposed spatial strategy

24.1.1 The proposed spatial strategy largely encourages the reuse of underutilised brownfield land in the West Hampstead Growth Area, maximising densities where appropriate with respect to the built character of the plan area. The reuse of the **West Hampstead Fire Station** and the **West Hampstead Police Station** is encouraged to add vibrancy to the streetscape by adding commercial uses at ground floor level and residential on upper floors.

Proposed approach to site specific policy

24.1.2 A new mixed use area is to be developed in the **West Hampstead Growth Area** supported by **Policy 4** promoting a mix of uses in an improved street environment that will have significant benefits for the area. New green/open public spaces will be integrated into the mixed use area, with green corridors linking other nearby neighbourhood centres. Improved pedestrian and cycle routes between **West End Lane** and **Finchley Road** allocated sites supported by **Policy 5: Other Sites** are to contribute to the positive character of the townscape, reducing the use of cars in the immediate area.

24.1.3 Land and buildings in viable use at allocated sites are to be retained in accordance with **Policy 5**, with levels of employment floorspace to be maintained or increased on redevelopment such as at the **West Hampstead Fire Station**. The ground floor use of buildings in the **Mill Lane** neighbourhood centre allocated site is to be preserved as primarily retail, restaurant/café, and business/commercial to retain and encourage a vibrant and economically active neighbourhood centre.

24.1.4 Development is to presume against the conversion of ground floor retail/business space into residential use in **Mill Lane Neighbourhood Centre** encouraging the continuous commercial reuse of town and neighbourhood centre properties in accordance with **Policy 13**. Development is to protect and enhance the village character of the Neighbourhood Centre by presuming in favour of improving and restoring shopfronts in the **Mill Lane Neighbourhood Centre** and the **Fortune Green Road Neighbourhood Centre** (supported by **Policy 14**).

The proposed approach to addressing specific policy issues

Relevant policies:

- **Policy 10** (Public & Community Services);

24.1.5 Improvements to existing community centres, such as the building and facilities provided by West Hampstead Library, are encouraged by **Policy 10: Public & Community Facilities** to continue to meet the needs of a growing population.

The Plan as a whole

24.1.6 As allocated spatial growth is largely concentrated towards a new mixed use area on brownfield sites within the West Hampstead Growth Area, the reuse of buildings (vacant or otherwise) to enhance the distinct character of the townscape is encouraged to retain valued community services and employment, retail and business sites in neighbourhood centres. The West Hampstead growth Area is likely to maximise densities creating a vibrant and busy mixed use area with respect to the urban character of the immediate area. **Significant positive effects** are predicted, given that the baseline situation would likely involve a more ad hoc approach to growth.

25 SUSTAINABLE TRANSPORT

The sustainability objectives are to -

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

[The proposed spatial strategy](#)

25.1.1 The proposed spatial strategy focuses primarily on achieving sustainable growth in the **West Hampstead Growth Area** allocated site due to their strategic proximity to public transport. Development at this location will enhance the provision of public transport in the Area. Improvements shall be made to the three railway stations in West Hampstead, with significant provision of pedestrian and cycling infrastructure to be enhanced in the public realm, particularly around the West Hampstead interchange – connecting the West Hampstead Town Centre through **West End Lane** with a new footpath and cycle route to the **O2 Centre Car Park** allocated site.

[Proposed approach to site specific policy](#)

25.1.2 Significant improvements are to be made in the **West Hampstead Growth** to the Area’s public transport, especially the Underground and Overground stations, in accordance with **Policy 4** which also sets priority provision for improved pedestrian and cycle routes between areas with allocated sites such as at **West End Lane** and **Finchley Road**. An improved street environment is to provide increased space for pedestrians, including green corridors and linked integrated open spaces. Development at the **Blackburn Road** allocated site is to provide for much needed pedestrian and cycling infrastructure to accommodate a large number of residents on a small road in close proximity of a public transport interchange.

25.1.3 Allocated Development at **Other Sites** not in the immediate vicinity of the transport interchange are supported by **Policy 5** to provide pedestrian/cycling links to adjoining areas to create a sustainable transport network of integrated spaces. New developments at the allocated site of **Maygrove Road** like development at the **West Hampstead Growth Area** sites are to be largely car-free in light of limited road space and proximity to public transport. Development is to provide for increased pedestrian and cycling access, integrated green open space routes and greater access to public transport options.

The proposed approach to addressing specific policy issues

Relevant policies:

- **Policy 6** (Public Transport); **Policy 7** (Roads); **Policy 8** (Cycling); **Policy 9** (Pavements & Pedestrians)

- 25.1.4 In accordance with **Policy 6** Development is to allow for significant improvements to existing **public transport** infrastructure while providing for additional infrastructure as the population in the growth area expands, especially in and around the West Hampstead Growth Area.
- 25.1.5 Development supported by **Policy 7** shall allow for the smooth and safe movement of traffic on **roads** and in the area and allow for a reduction in car use. In line with this **Policy 8** supports development that allows for the improved provision of **cycling** within the local area and the encouragement of cycling in the wider area through the plan area.
- 25.1.6 Pedestrian access in the area shall be maximised by development supported by **Policy 9: Pavements & Pedestrians** which shall deliver wider pavement space, improved accessibility for disabled people and push chairs. New networks of paths particularly in and around the Growth Area are to include new crossings over the railway lines.

The Plan as a whole

- 25.1.7 The proposed spatial strategy will significantly reduce reliance on private transport modes by focusing growth with the West Hampstead interchange area. The plan might be described as infrastructure led, in that it guides growth towards an area of high public transport accessibility. Development of the West Hampstead Growth Area will enhance accessibility to public transport options (overground, underground, bus) while enabling the increased provision of pedestrian and cycling routes through the local area, transport interchange and wider area. **Significant positive effects** are predicted.
- 25.1.8 While policies are ambitious in encouraging car free or car capped housing within the Growth Area, there may be opportunities to take a more prescriptive approach. This could help to ensure that issues are addressed fully at the development management (planning application) stage. Likewise policy for the improved provision of cycling infrastructure in the area could be more prescriptive and hence help to ensure maximum benefits.

26 WATER, FLOOD RISK AND OTHER CLIMATE CHANGE ADAPTATION ISSUES

The sustainability objectives are to -

- Protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change
- Promote the sustainable use of water resources
- Encourage development that incorporates sustainable drainage
- Help to reduce the risk of flooding and increase flood resilience, including surface water flooding

The proposed spatial strategy

26.1.1 The proposed growth strategy for the plan area will protect and enhance existing open space while create new green spaces in the local environment. Development that encourages the creation of green corridors and open spaces offer climate change adaptation measures while making the area more resilient to surface water flooding.

Proposed approach to site specific policy

26.1.2 Development of the **West Hampstead Growth Area** is supported by **Policy 4** which responds to the potential impacts of climate change by providing more green/open space, including new trees and green corridors, with integrated pedestrian and cycle routes. This policy response is likewise supported in **Policy 5: Other Sites** to create a sustainable network of green infrastructure across the plan area.

The proposed approach to addressing specific policy issues

Relevant policies:

- **Policy 8** (Cycling); **Policy 9** (Pavements & pedestrians); **Policy 16** (Green/open space); **Policy 17** (Trees)

26.1.3 The encouragement of development that allows for the improved provision of cycling in accordance with **Policy 8** and other site specific policy to create pedestrian and cycling routes enables a significant reduction in car based transport in the area.

26.1.4 The inclusion of permeable paving and sustainable drainage in **Policy 16: Green/open space** and **Policy 9: Pavements & pedestrians** have the potential to offset surface water flooding.

26.1.5 The protection, addition and offsetting of any lost green spaces through **Policy 16** and **Policy 17** have a positive impact, particularly given likely increases in flood risk associated with climate change. Policy 16 is clear that Sustainable Drainage Systems (SuDS) should be integrated as part of any future schemes that improve existing (or provide for new) green spaces.

The reference to SuDS within Policy 16 reflects the following past (May2014) SA recommendation: *Set policy with a view to ensuring that effective and multifunctional Sustainable Drainage Systems (SuDS) are implemented as part of development schemes and open space enhancement schemes.*

The Plan as a whole

26.1.6 Although climate change adaptation measures are set to be put in place, including implementation of green corridors and open spaces in the plan area, more proactive approaches to ensuring flood resilience could be taken. Significant effects are unlikely.

27 SEA CONCLUSIONS AT THIS CURRENT STAGE

27.1 Introduction

27.1.1 This Chapter presents summary assessment findings and overall conclusions at this stage.

27.2 Conclusions and recommendations at this current stage

Conclusions

27.2.1 The assessment presented above finds that the Plan is likely to lead to significant positive effects in terms of 'Community and wellbeing', 'Heritage', 'Housing', 'Townscape' and 'Sustainable transport'. In terms of a number of other issues/objectives the assessment highlights that the plan is likely to have a positive effect, but that effects will not be 'significant' given that the key decisions have already been made at a higher level, i.e. the Neighbourhood Plan is 'building on an existing policy framework'. No significant negative effects are predicted, although a number of ways in which the plan could potentially 'go further' and hence secure benefits for particular aspects of the sustainability baseline are highlighted.

27.2.2 The benefits relate primarily to the fact that the Plan seeks to ensure a proactive approach to the development of the West Hampstead Growth Area as a local hub, whilst at the same time respecting (i.e. seeking to maintain or enhance) existing valued assets and the character of the local area more generally. The potential for development of the West Hampstead Growth Area to facilitate sustainable travel (i.e. walking, cycling and public transport) is a key issue, and one that is set to be capitalised upon.

Recommendations

27.2.3 No recommendations remain outstanding at the current time.

27.2.4 Three recommendations were made within Part 3 of the Environmental Report published alongside the Draft (Pre-submission) Plan in May 2014. Two of those recommendations have now been taken on-board, i.e. are reflected in the Submission Plan (see discussion within the two 'boxes' under the 'Climate change mitigation' and 'Water' topic headings). Another recommendation was made around Policy 2 (Design & Character), which has *not* resulted in a change to the plan. Specifically, it was recommended that the Policy should make reference to the existing natural heritage and the potential for new development to contribute, e.g. through tree planting and other landscaping work. The Neighbourhood Forum is of the view that natural heritage issues are sufficiently covered by Policies 16 and 17.

PART 4

WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

29 INTRODUCTION (TO PART 4)

The Environmental Report must include...

- Measures envisaged concerning monitoring

29.1.1 This Part of the report explains next steps that will be taken as part of plan-making / SEA.

30 PLAN FINALISATION AND ADOPTION

30.1.1 **Regulation 15**, of the Neighbourhood Planning Regulations, requires that the Forum submit (to the Local Authority) the 'Proposed' Plan and a 'Consultation Statement'. The Consultation Statement must describe issues or concerns raised through the Pre-submission Plan / Environmental Report consultation and how these were addressed when preparing the Proposed Plan for submission.

30.1.2 **Regulation 16** then requires that the Local Authority 'publicises' the Proposed Plan so that stakeholders can make representations that may then be considered at Examination. It will be appropriate for the Local Authority to also publicise the updated Environmental Report, with a view to informing representations.

30.1.3 **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 in accordance with Regulation 16. It may be appropriate for the Local Authority to also submit the updated Environmental Report, with a view to informing the Examination.

30.1.4 **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.

30.1.5 **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.

31 MONITORING

31.1.1 At the current stage – i.e. in the Environmental Report - there is a need to present 'a description of the measures envisaged concerning monitoring'. In light of the assessment findings presented in Part 3 of this report, it is suggested that monitoring might focus on **sustainable travel** (to ensure that likely benefits are maximised) and the approach that is taken to the redevelopment of particular key sites / buildings (e.g. to ensure that **heritage** value / the setting of valued heritage assets is not negatively affected).

APPENDIX I - REGULATORY REQUIREMENTS

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

Annex 1

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	i.e. answer - <i>What are the key issues & objectives?</i>	
(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		
(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	i.e. answer - <i>What are the appraisal findings at this current stage?</i>	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i>	

APPENDIX II – THE CAMDEN SEA 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?	<ul style="list-style-type: none"> • 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?	<ul style="list-style-type: none"> • % 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 • Recorded crime per 1,000

No.	Objective	Criteria	Potential Indicator(s)
			population for burglaries, criminal damage, drug offences, robbery and violence against a person. <ul style="list-style-type: none"> • 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?	<ul style="list-style-type: none"> • 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?	<ul style="list-style-type: none"> • 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 housing in social housing sector • Number of Hostels and Care Homes • Town Centre Health Check • % Ground Floor Vacant Floor-space in primary Shopping Frontages

No.	Objective	Criteria	Potential Indicator(s)
			(London frontages and neighbourhood centres) <ul style="list-style-type: none"> • 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?	<ul style="list-style-type: none"> • 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 wellbeing 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?	<ul style="list-style-type: none"> • 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 • Area of new education facilities created

No.	Objective	Criteria	Potential Indicator(s)
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?	<ul style="list-style-type: none"> • % 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?	<ul style="list-style-type: none"> • % 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?	<ul style="list-style-type: none"> • % 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

No.	Objective	Criteria	Potential Indicator(s)
10	To improve amenity by minimising the impacts associated with noise	a) Will the Area Plan 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?	<ul style="list-style-type: none"> • Nos. of complaints about noise • % 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?	<ul style="list-style-type: none"> • <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?	<ul style="list-style-type: none"> • 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 encourage the movement of waste up the hierarchy?	<ul style="list-style-type: none"> • % new developments using sustainable construction • % of households recycling • % of total waste recycled and composted • 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	<ul style="list-style-type: none"> • Number of days when air pollution exceeds limits • Carbon dioxide (CO₂), Nitrogen

No.	Objective	Criteria	Potential Indicator(s)
		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?	dioxide (NO ₂) and particulate matter (PM ₁₀) emissions <ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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?	<ul style="list-style-type: none"> • 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 – BUILDING HEIGHTS

Assessment methodology

For each of the options, the assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / issues / objectives identified through scoping (see Part 1) 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.

Effects are predicted taking into account the criteria presented within Regulations.¹⁷¹ 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.

Every effort is made to predict 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 (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 Plan 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 assessment text.¹⁷²

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'.

¹⁷¹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

¹⁷² It is worth noting that, as stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pageId=156210>): "Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

Alternatives assessment findings: Building heights

- (1) Outside the growth area, new development should be no higher than existing buildings in their immediate vicinity.
- (2) Development across the NDP area should be no higher than 6 storeys in line with the predominantly low-rise character of existing buildings. The height of new buildings shall fit in with the rooflines of existing buildings in their immediate vicinity
- (3) A more flexible approach should be taken, with an acceptance that tall buildings will become more prevalent.

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference		
		Opt 1	Opt 2	Opt 3
Air quality and noise	All options have effects on air quality and noise during phases of construction. Construction in residential areas should be limited to normal working hours to reduce noise and emissions. Emissions from construction transport and subsequent increase in population and potential car usage in the Growth Area can contribute to a decrease in air quality. Higher density living due to increased building heights within the Growth Area, located in close proximity to the transport interchange (underground, rail, bus), can result in a <u>decrease in car usage</u> with an <u>increase in public transport</u> commuting - resulting in a <u>positive net effect on air quality</u> . Option 3 may lead to an increased correlation between building heights and car emissions (increased car ownership) as proximity to public transport options at the West Hampstead Interchange decreases. Roads with the highest traffic volumes, such as Finchley Road, have the worst air pollution levels in the borough. Increases in population and employment are likely to further impact on Camden's air quality as the demand for the movement of freight grows.	★ 1	★ 1	2
Biodiversity	No implications.	N/a	N/a	N/a
Climate change mitigation (non-transport related)	Options 1 and 3 support the NPPFs transition to a <u>low carbon</u> future in terms of meeting the targets set out in the Climate Change Act 2008, by encouraging <u>increased building heights</u> which allow <u>higher residential densities</u> – with option 1 especially planning for new development in locations and ways which <u>reduce GHG emissions</u> , having employment and residential opportunities at a transport interchange.	★ 1	3	2
Community and wellbeing	Option 2 sets development thresholds that would decrease the extent of urban <u>visual impact</u> on communities, with increased building heights in option 1 allowing for a <u>positive strategic increase in mixed use commercial services</u> in the West Hampstead Growth Area, acting as an accessible ' <u>hub</u> ' for local communities.	★ 1	★ 1	2
Economy	Option 1 supports the National Planning Policy Framework of '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'. Option 1 allows for the <u>strategic growth of the West Hampstead Growth Area</u> (1000 new homes and an additional 7000 square meters of commercial floor space to be provided here in the duration of the plan as identified in the Camden CSS). Significant positive effects are predicted.	★ 1	2	2

	Option 2 constrains the economic potential of larger building development that potentially is accessible under the constraint free Option 3, however restricting building heights in and around conservation areas can increase the economic benefit of the plan area by <u>enhancing the cultural distinctiveness of the built heritage</u> .			
Heritage	Options 1 and 2 are <u>strategically drafted to deliver the conservation and enhancement of the historic environment</u> with respect to building heights. Both options recognise the significant importance of retaining the historic setting, and the contribution that it can make to the social, economic and cultural life of the plan area. Option 3 would have a significant negative effect on heritage, allowing for an increase in building heights across the plan area, especially on the designated Conservation Area. Options 1 and 2 encourage building height to <u>reinforce local distinctiveness</u> , enhance the standard of design more generally in the area and address the connections between people and places.	★ 1	★ 1	2
Housing	Option 3 allows a <u>case-by-case scenario</u> with regard to housing and building height to be implemented when compared to the restrictive nature of option 2. The NPPF suggests larger developments are sometimes the best means of achieving a supply of new homes. Option 1 encourages a <u>recognised housing solution</u> with regard to building heights and proximity to services. Option 2 does not encourage the 'significant boost to the supply of housing' required under the NPPF to meet the 'full, objectively assessed need for market and affordable housing' in this area.	★ 1	2	★ 1
Landscape / townscape	Development on allocated sites that are currently proposed under the Camden Council Local Development Framework to be designated as Local Green Space, namely Gondar Gardens Reservoir and the Fortune Green Play Centre, will result in a loss of Green Open Space, local biodiversity and views valued by residents. Option 2 offers the most <u>protective policy</u> towards landscape/townscape, not afforded under the flexible premise of option 3 which encourages a more proactive approach to building heights. Option 1 is sympathetic towards building heights outside the Growth Area, while potentially <u>enhancing the visual resource of the area by creating a landmark hub interchange</u> . Camden Council's Core Strategy seeks to encourage high density housing in the Growth Area with schemes to be of 'excellent design quality' that 'sensitively consider the amenity of occupiers and neighbours' and the 'character and built form of their surroundings' with particular regard to existing residential communities, massing and building heights, and neighbouring conservation areas. Guidance on Tall Buildings sets out how CABI and English Heritage, with respect to landscape/townscape, evaluate proposals for tall buildings, calling for local authorities to consider appropriate locations for tall buildings in their areas by undertaking urban design studies to identify these.	★ 1	★ 1	2
Sustainable transport	Development of the West Hampstead Growth Area through the implementation of the building heights policy in Option 1 is supported in the London plan as becoming 'a significant inner London transport interchange with potential to improve connections between rail, underground and bus and to secure an uplift in development capacity through intensification'. Option 1 encourages those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.	★ 1	3	2
Water, flood risk and other climate	No implications.	N/a	N/a	N/a

change adaptation issues				
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Summary

Option 1 policy for Building Heights would lead to **significant positive effects** in terms of the economy and employment on the basis that it would support the objectives of the West Hampstead Growth area. Option 1 provides for strategic housing in line with the quantum allotted in spatial plans (Camden CSS & London Plan), and would also lead to notable climate change mitigation benefits given high housing density near to a public transport interchange. **Option 2** is unlikely to deliver as many notable positive effects as Option 1. **Option 2** would allow for an increase in housing on all allotted sites, but can be considered unsustainable in terms of other objectives, with **significant negative effects** predicted in terms of heritage.

APPENDIX IV – BASEMENT DEVELOPMENT

Alternatives assessment findings: Basement development

- (1) A presumption against basement development more than one storey deep or outside the footprint of the property. Development should not cause harm to the natural environment and local amenity; result in flooding; or lead to ground instability.
- (2) A presumption against all basement development due to environmental constraints.
- (3) A more flexible approach should be taken, with an acceptance that basements will become more prevalent. The scale of basement developments to be determined on a case-by-case basis.

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference		
		Opt 1	Opt 2	Opt 3
Air quality and noise	Options 1 and 3 have effects on air quality and noise during the construction phase. Construction in residential areas should be limited to normal working hours to reduce noise and emissions. The presumption against development in Option 2, due to localised flooding and conservation sensitivities of the area's built heritage, would result in a stasis in air quality and noise.	2	★1	2
Biodiversity	No implications	N/a	N/a	N/a
Climate change mitigation (non-transport related)	Option 1 and 3 would allow development of basements with regard to environmental conditions favoured by a Basement Impact Assessment. The Government sets out proposals to reduce the carbon footprint of new housing development in Building a Greener Future: Towards Zero Carbon Development by indicating the importance of moving towards <u>zero carbon in new housing</u> . ¹⁷³ Option 2 may lead to a larger overall footprint of development that may be <u>offset through compact urban basement development</u> as proposed in Options 1 and 3.	★1	2	★1
Community and wellbeing	A review of the policy context demonstrates a nationally recognised need for a step change in housing delivery. Option 3 is in line with this objective, as is option 1. The use of basements in the West Hampstead Growth Area has the potential to <u>take cars off streets while providing parking security</u> . Option 2 has a primary regard to the environmental issues of localised flooding and the conservation sensitivities of the area's built heritage historic setting. The contribution the 'village feel' heritage resource makes to the social, economic and cultural life of the area should not be undermined by basement development.	★1	2	★1

¹⁷³ CLG (2006) Building a Greener Future: Towards Zero Carbon Development – Consultation [online] available at: <http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/archived/publications/planningandbuilding/buildinggreener> (accessed 03/14)

Economy	Option 3 provides for a more keen <u>economic policy</u> whereby basement levels and floor space are to be identified on a <u>case-by-case basis</u> . West Hampstead is set to be a <u>future area of growth</u> as it has been identified as an ‘area for intensification’ in the London Plan and a ‘growth area’ in Camden’s LDF. The LDF suggests that there is capacity in the area for around <u>1000 new homes and 7,000m² of business floor space</u> over the period to 2026. Option 3 favours development ‘ <u>intensification</u> ’ largely in the Growth Area, while allowing for <u>lesser degrees of development</u> in those areas not favourable to basement development. Option 3 safeguards against basement development partially due to the retention of the <u>economic merits of the historic setting</u> of a preserved conservation area.	2	3	★1
Heritage	Option 2 <u>safeguards heritage</u> against basement development. The <u>precautionary nature</u> of Option 1 recognises the positive contribution new development can make to local character and distinctiveness allowing basement development to one storey deep within the footprint of the property. The open nature of basement development in option 3 may be regarded as a carte blanche approach with regard to the <u>detriment of the protected historic urban fabric</u> of the area. 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.	2	★1	3
Housing	The delivery of housing is supported by options 1 and 3, which <u>encourages an increase in the envelope of development</u> . The restrictive nature of Option 2 would not allow the optimum floorspace to be attained in the West Hampstead Growth Area or other allotted sites.	★1	2	★1
Landscape / townscape	Basement development is a contentious with regard to the <u>conservation issue of the historic setting</u> of the built heritage in the area. Option 2 has clear regard to the <u>preservation of the townscape</u> , while Option 1 has regard to the needs of residents with respect to <u>environmental conditions and design constraints</u> .	★1	★1	2
Sustainable transport	No implications.	N/a	N/a	N/a
Water, flood risk and other climate change adaptation issues	Basement Development under Option 1 has clear <u>regard to water, flood risk, ground instability and the environmental constraints of the area</u> . The restrictive outlook of Option 2 is due to localised flooding in the area, while the proactive Option 3 looks to address development on a case-by case basis. Given the localised nature of flooding issues, it is not possible to conclude that Option 3 would lead to significant negative effects.	★1	2	3

Summary

The merits of **Option 1** relate to Climate Change mitigation, Community & Wellbeing, Housing, Landscape/Townscape, and Water and Flood Risk. **Option 2** has merits with respect to the built heritage of the plan area, while **Option 3** would be in-line with objectives relating to Economy and Housing. It is not possible to conclude significant positive effects, as the magnitude of any effect ‘on the ground’ (i.e. the scale of basement development that would occur under any option) is uncertain, and there is also confidence in the ability to address issues associated with basement development (e.g. flood risk) at the planning application stage.

APPENDIX V – BRIDGES

Alternatives assessment findings: Bridges

- (1) New pedestrian bridges across the rail line to improve access across the area linking communities.
- (2) New pedestrian and cycle links to connect the community to the transport interchange stations
- (3) Widening of bridges over railway lines to accommodate the smoother movement of traffic (as well as enable walking/cycling connectivity).

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference		
		Opt 1	Opt 2	Opt 3
Air quality and noise	An upgrade of Bridges at the West Hampstead Transport Interchange under Option 3 will allow for a <u>smoother flow of traffic</u> (albeit a potential increase in traffic) through the wider area, lowering emissions due to a decrease in traffic congestion, while <u>increasing access to public transport</u> for commuters which may result in a significant increase in air quality. While Option 3 primarily deals with the improved movement of traffic through the wider area, all options have merit with regard to improving air quality and decreasing car journeys in the immediate area. The Camden Transport Strategy and Local Implementation Plan sets objectives to <u>reduce motor traffic and vehicle emissions to improve air quality</u> , mitigate climate change factors and contribute to making Camden a 'low carbon and low waste borough' encourage healthy and sustainable travel choices by <u>prioritising walking, cycling and public transport</u> in Camden. All options would lead to significant positive effects .	★ 1	★ 1	★ 1
Biodiversity	Most of the land adjacent to the railway lines is identified as SNCI land; however, it is not clear that new or expanded bridges would lead to a notable detrimental effect. Pedestrian and cycle links (option 2) could be designed so as to contribute to the green infrastructure network; however, any benefits in this respect are uncertain.	?	?	?
Climate change mitigation (non-transport related)	No Implications	N/a	N/a	N/a
Community and wellbeing	Options 1 and 2 have direct significant positive effects on community and wellbeing. Option 1 is a response to a consultation held with youth in the area looking for greater local connectivity between communities, while option 2 and 3 responds to the access requirements an increase in the scale of development within the West Hampstead Growth Area (and transport interchange) would need. In the Neighbourhood Development Plan bridge infrastructure requirements to <u>improve transport links, accessibility and connectivity</u> is central to increasing the sense of community and wellbeing, with all policy options having significant positive effects on the local and wider area. The introduction of <u>walking and cycling infrastructure</u> independent of traffic will have significant positive effects on community and	★ 1	★ 1	2

	wellbeing, increasing exercise opportunity and fostering a sense of ownership of infrastructure for those who cycle, walk and jog in the community.			
Economy	Improvement of links between the Transport Interchange and the West Hampstead Growth area will aid connectivity to employment and residential areas.	2	★1	★1
Heritage	No implications	N/a	N/a	N/a
Housing	No implications	N/a	N/a	N/a
Landscape / townscape	The area around the stations 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. Increased access to stations with a widening of bridges to alleviate congestion will have a significant positive effect on the visual landscape of the gateway. A pedestrian bridge crossing the rail line may impede open space views valued by residents; alternatively the bridge design may enhance the view further increasing the community value of the areas.	★1	★1	★1
Sustainable transport	With the due increase in housing allocation, there will be a need to support the area's growing population. This will place <u>significant extra pressure on the transport network</u> in the borough and surrounding areas. Option 2 considerably supports the further use of bridge infrastructure to <u>connect the community and wider area to sustainable transport</u> , with Option 1 encourages local <u>pedestrian and cycling connectivity between residential areas</u> . Option 3 primarily deals with the alleviation of traffic through the interchange by widening bridges that will also include sustainable transport measures for cyclists and pedestrians. The Camden Transport Strategy and Local Implementation Plan sets out the future direction for transport in Camden with clear objectives to <u>reduce motor traffic and vehicle emissions</u> to improve air quality, mitigate climate change and contribute to making Camden a 'low carbon borough'. It <u>encourages healthy and sustainable travel choices</u> by prioritising walking, cycling and public transport in Camden. All options will lead to significant positive effects .	★1	★1	★1
Water, flood risk and other climate change adaptation issues	No implications	N/a	N/a	N/a

Summary

All options would support the targeted upgrading of access infrastructure in the West Hampstead Growth Area and hence lead to **significant positive effects** in terms of transport and associated air quality issues. Option 1, directed towards the linking of communities otherwise disconnected by a rail line has particular merits in terms of community and wellbeing objectives, while option 2 (focused on connectivity between the community and the wider area through sustainable transport modes) would lead to wider positive environmental, social and economic sustainability benefits. Option 3 has wider commercial economic merits for the local and wider area (e.g. delivery of freight), as well as providing for sustainable transport infrastructure through the interchange.

APPENDIX VI – CONSERVATION AREAS

Alternatives assessment findings: Conservation areas

- (1) A traditional approach to safeguarding and enhancing Conservation Areas and heritage sites,
- (2) Keep Conservation Areas under review and investigate the merits of designating new conservation areas where residents demand them.
- (3) The introduction of an Article 4 declaration on all commercial and residential properties with imposition of an Area of Special Control of Advertisements in Conservation Areas.

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference		
		Opt 1	Opt 2	Opt 3
Air quality and noise	Large scale developments leading to a decrease in air quality and noise during construction phases are highly unlikely to reach development consent under all precautionary options presented.	N/a	N/a	N/a
Biodiversity	No implications	N/a	N/a	N/a
Climate change mitigation (non-transport related)	No implications	N/a	N/a	N/a
Community and wellbeing	The West End Green Conservation Area falls within the NDP area and is characterised by a London village running along the spine of the West End Lane. The ' <u>village feel</u> ' heightens the sense of <u>community and wellbeing</u> within the conservation area. Option 1 is likely to enhance this character allowing enhancement of the area through <u>high quality design sympathetic to the protected built heritage</u> present. Option 2 seeks to replicate this community quality by paving the way for a Fortune Green Conservation Area to be designated if demanded by the residents of the plan. The imposition of an Area of Special Control of Advertisements in Conservation Areas under Option 3 intends to reduce the <u>clutter of signage</u> to further improve the aesthetic qualities of the Victorian and Edwardian streets.	★ 1	★ 1	★ 1
Economy	While all options are conservative with regard to development within the historic urban fabric, Option 3 looks to place further restrictions on requirements of approval. The intention for the imposition of an Area of Special Control of Advertisements in Conservation Areas is to remove the clutter of signage not generally associated with conservation areas. The West Hampstead Place Plan states ' <u>a mix of employment space</u> is important to the local economy and employment opportunities' and that there is ' <u>a desire for small businesses</u> to be able to stay in the <u>area</u> ' with a need to ' <u>develop space...affordable to their needs</u> '. While Option 3 does not entirely discount new commercial activity within the conservation area, there is a need to protect commercial sites in order to avoid the area becoming a commuter residential zone.	★ 1	★ 1	2

	Whilst prescriptive conservation based policy can be restrictive on commercial activity in area, it can also make an area more attractive to live and work in. Option 1 and 2 keep within the framework of the traditional safeguarding and enhancing of conservation areas, presumption in favour of development that enhances and conserves the character of neighbouring buildings.			
Heritage	Options 2 and 3 are proactive approaches to extending the protective designatory role of conservation areas; however, a more traditional approach could also be effective from a heritage perspective.	★1	★1	★1
Housing	The West End Green Conservation Area Appraisal and Management Strategy (2011) recognises the development pressure on this area of protected Victorian and Edwardian built heritage. The Grade II listed Fire Station, listed as an allocated site for housing, is a cultural asset that provides a 'village feel' to the area. The Appraisal and Management Strategy states that development 'must preserve or enhance the character or appearance' reflecting the 'materials, colour palette, scale and character of the area'. The strategy suggests an <u>Article 4 Direction on control over development</u> be imposed on the built heritage in the area as suggested in Option 3. Prescriptive policy, as suggested by the strategy with respect to conserving the heritage of the area, would make the delivery of significant numbers of <u>affordable housing</u> increasingly untenable. Option 1 and 2 would allow <u>sites to be identified</u> more readily for an increased demand for housing in the Borough.	★1	2	3
Landscape / townscape	In terms of the townscape, West End Lane forms the spine of the West Hampstead town centre. Option 3 would improve the visual aesthetics of the streetscape, with all other options providing a state of preservation for the area.	2	2	★1
Sustainable transport	No implications.	N/a	N/a	N/a
Water, flood risk and other climate change adaptation issues	No implications.	N/a	N/a	N/a

Summary

While all three options could be effective in terms of addressing the conservation principles for the area, the traditional approach under **Option 1** encourages a more 'tried and tested' approach. Commercial and residential development may flourish better under Option 1.

APPENDIX VII – VIEWS

Alternatives assessment findings: Views

- (1) Development should presume in favour of protecting, preserving and enhancing existing green/open space and street views and the distinct character and appearance of the area, while providing new views and green/open space linking sites.
- (2) Proactively support the existing ‘green corridors’ alongside railway lines.

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference	
		Opt 1	Opt 2
Air quality and noise	No implications	N/a	N/a
Biodiversity	The open space site identified at Gondar Gardens Reservoir presents an opportunity to create views of open space and <u>increase the biodiversity value</u> of the area. The London Plan (Policy 7.18) encourages the creation of new open space in London to ensure satisfactory levels of provision to address areas of deficiency. Camden Council Core Strategy (Policy CS15) seeks to protect and improve Camden’s parks and open spaces to tackle deficiencies to meet increased demand for open space in growth areas. The <u>preservation of green corridors</u> alongside railway lines would have a significant positive effect on biodiversity. Camden Borough is considered deficient in terms of accessible open space, whilst the open space bordering the railway corridor is inaccessible, the <u>view of open space</u> it provides is valued by residents		
Climate change mitigation (non-transport related)	Identifying areas of open spaces that merit views worth protecting under Options 1 and 2 can act as green infrastructure, such as Sustainable Urban Drainage Systems (SuDS), aiding climate change mitigation as highlighted by Camden Development Policy DP22.		
Community and wellbeing	The West Hampstead area has been identified in the Camden CSS as an area deficient in public open space, a factor that contributes to the decline in community wellbeing. The allocated development sites of Gondar Gardens Reservoir and Fortune Green Play Centre are Designated Local Green Space in the Camden Council Local Development Framework Proposals Map (2010). These local community assets afford residents <u>views of open space</u> that are increasingly coming under local development pressure for housing demand. Option 1 provides scope to protect, preserve and enhance green/open space and street views when allocating sites for development. Option 2 safeguards against loss of green infrastructure alongside railway lines. Both options pay respect to the <u>visual resource of open space</u> of the receiving environment when considering <u>how communities use a space</u> under development pressure.		

Economy	Option 1 supports the enhancing of street views and the distinct character and appearance of the area that can with other similar proactive policies cumulatively attract economic benefits to the West End Green Conservation Area.		2
Heritage	Option 1 supports the enhancing of street views and the distinct character and appearance of the area that can with other similar proactive policies cumulatively attract economic benefits to the West End Green Conservation Area.		2
Housing	While option 1 <u>supports development</u> in the plan area it primarily looks to <u>protect open space</u> , that otherwise may have been considered for housing, to encourage the enhancement of existing green areas to <u>provide open space amenities and views for residents in the immediate area</u> .	N/a	N/a
Landscape / townscape	Both options support the proactive enhancement of <u>landscape/townscape</u> for the betterment of the plan area. Option 1 deals primarily with the open space and distinctive character of the landscape of the areas' streets, while option 2 looks to acknowledge the visual resource of the green corridor landscape along the rail line.		
Sustainable transport	There is merit in the provision of <u>green infrastructure</u> for sustainable transport in Option 1, where <u>cycle lanes</u> can enhance the sightline of streets, while forming part of existing green/open space <u>linking areas of the neighbourhood</u> .		2
Water, flood risk and other climate change adaptation issues	Policy supporting the <u>safeguarding of views</u> and consequently <u>the protection and creation of green/open space</u> (Options 1 and 2) encourages the <u>implementation of climate change adaptations</u> which can <u>mitigate for flood risk, improve groundwater quality, and link ecological habitats</u> . The key flood risk to Camden is from surface water flooding. This form of flooding occurs when the volume and intensity of a rainfall event exceeds the capacity of the drainage system. The creation of green open spaces would link spaces that can readily <u>dissipate flood waters</u> through the use of SuDS, a low environmental impact approach to draining surface water run off through collection, storage and cleaning, before slow release back into the environment.		

Summary

The retention of existing views and creation of new green/open areas to enhance views as supported by **Options 1 and 2** will lead to benefits in terms of climate change mitigation, biodiversity, community and wellbeing, and landscape/townscape character. **Option 1** has more beneficial effects with regard to the immediate residential and commercial environment in terms of heritage value and economy, and provision of greenways for sustainable transport. There are a myriad of benefits and merits in the creation of a network of green open spaces in the plan area in terms of mitigating against localised flooding, enrichment of biodiversity in an area, and the provision of space for residents of all ages to enjoy.