

Sustainability Appraisal of Camden's Site Allocations Local Plan

**Scoping Report
January 2019**

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1.0 Introduction

This document is the Scoping Report for the Sustainability Appraisal (SA) of Camden's Site Allocations Local Plan. This scoping report provides updates to relevant plans, policies and programmes, the baseline and key sustainability issues which, in hand, develops sustainability objectives and criteria.

This scoping report explains:

- Why a sustainability appraisal of the Site Allocations is required;
- The policies, plans and programmes relevant to them;
- The baseline information for the various indicators used to appraise development plan documents;
- The sustainability appraisal process and requirements; and
- How the information obtained is taken forward in the SA and the Site Allocations Local Plan.

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

- The Environment Agency
- Natural England
- Historic England

We are now at the stage where we wish to obtain the views of these agencies, as well as other interested organisations and parties, on this scoping report. Consultation at this stage will help to make sure that the SA will be comprehensive and robust and meet statutory requirements. Questions on which interested parties' comments are sought are included at the end of this report.

2.0 Why is a Sustainability Appraisal required?

Legal Requirements

Under the *Planning and Compulsory Purchase Act* sustainability appraisal is mandatory for any Local Plan Document.

The National Planning Policy Framework states that local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets relevant legal requirements. The Appraisal should demonstrate it has “*addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)*” (NPPF, paragraph 32).

In preparing a Local Plan Document local planning authorities are required to carry out an environmental assessment, known as a Strategic Environmental Assessment (SEA). This requirement comes from European Directive 2001/42/EC (the SEA Directive) and has been enacted in the UK by a separate piece of legislation: the *Environmental Assessment of Plans and Programmes Regulations 2004* (the SEA Regulations). Whilst the SA guidance produced by the ODPM provides information to assist compliance with the SEA Directive, a separate guidance note for the production of SEA is set out in *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM et al, 2005).

The use of the term SA throughout this document also encompasses any relevant requirements of an SEA.

This scoping report proposes a framework against which Camden’s Site Allocations can be assessed. It is based on the SA Scoping Report for the Camden’s Local Plan and has been informed by an update of the policy context and baseline indicators to reflect changes in policy and baseline information. The sustainability impact of the Site Allocations will then be assessed against these objectives (the Sustainability Appraisal Framework) in the next stages of the SA process.

3.0 The sustainability appraisal process

The production of SA comprises five main stages listed as A-E below.

Table 1: SA and Site Allocations preparation process

SA Process		
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope	Pre-production: review of the Site Allocation, consultation and evidence gathering
Stage B	Developing and refining options and assessing effects	Production and consultation
Stage C	Preparing the SA Report	
Stage D	Consulting on the draft DPDs and the SA report	
		Adoption
Stage E	Monitoring the significant effects of implementing the DPDs	

This scoping report forms the first stage (Stage A) of the SA of the proposed Site Allocations and will look to identify the broad sustainability effects of the Site Allocations and the approach and level of detail appropriate for the SA, which will accompany the draft document when it is ready for consultation.

One of the outcomes of the scoping report will be a proposed Sustainability Appraisal Framework. The Framework will consist of a set of draft sustainability objectives and criteria against which the objectives of the Site Allocations can be compared to assess compatibility and inconsistencies. These in turn will go on to provide the structure and scope of the final draft SA, which will be consulted upon along with the draft document.

The Scoping Report

This report comprises *Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope*, and consists of the following tasks:

- **A1:** Identifying other relevant policies, plans and programmes, and sustainable development objectives.
- **A2:** Collecting relevant social, environmental and economic baseline information.
- **A3:** Identifying key sustainability issues for the SA/DPDs to address.
- **A4:** Developing the SA framework consisting of SA objectives and indicators.
- **A5:** Consulting relevant authorities on the scope of the SA.

The aim is to ensure that the SA is as comprehensive as possible and addresses the most relevant issues. A further key aim is to enable input from key consultees at an early stage in the process. This report therefore follows each of the above stages (A1-A5) in turn.

STAGE A1: Identifying other relevant policies, plans and programmes, and sustainable development objectives

The SA must take into account the relationships between the Site Allocations and other relevant policies, plans, programmes and sustainability objectives. This section presents an overview of existing plans, programmes, policies and sustainability objectives that are considered to be of most relevance.

In addition, the SEA Directive specifically requires environmental protection objectives established at international, European Community or national levels to be taken into account. The Environmental Report should provide information on:

- The relationship [of the plan or programme] with other relevant plans and programmes; and
- The environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation” (Directive Annex I a and e).

Government guidance indicates that this process will help to:

- identify any external social, environmental or economic objectives that should be taken into account in the SA of the Site Allocations;
- identify other external factors, including sustainability issues that might influence the preparation of the Site Allocations; and
- determine whether other policies, plans and programmes might give rise to cumulative effects when combined with the Site Allocations that is subject to the SA.

Identifying and reviewing these documents is an important element of the SA and SEA process, as it can help to shape the objectives against which the document should be appraised, as well as indicating any particular issues and problems that need to be addressed. Potential synergies, inconsistencies and constraints can also be identified.

A review of relevant policies, plans and programmes has been carried out as part of this stage of the SA process. The objectives and requirements of international and European strategies and Directives are now sufficiently well established to have translated down into existing and emerging national, regional and local programmes, plans and policies. Their influence will be strongly felt in the consideration of these lower tiered documents, so it is considered appropriate in this SA to focus on their key messages before reviewing other documents in greater detail.

Table 2 indicates international and European strategies and Directives that will have been taken into account. Links to the sources of these documents are provided.

Further assessment relates only to those national, regional and local strategies, plans and programmes which have been considered to have most relevance to the Site Allocations. It has proceeded on the presumption that sustainability policy and objectives of higher order plans are now sufficiently embedded within them.

Table 3 provides a summary list of the national, regional and local strategies, programmes, plans and policies that have been reviewed. Links to the sources of these documents are also provided.

A full assessment of relevant documents has been undertaken to identify the relevant objectives and targets from the plans reviewed and their potential implications for the sustainability appraisal objectives and the Site Allocations. This is included in **Appendix 1**.

Table 2: Key Messages from International and European Strategies and Directives

International Organisations, the Relevant Documents and Key Messages Relevant to Other Plans and Programmes															
C40 Cities:	<p>Opportunity 2030: Benefits of Climate Action in cities (2018)</p> <ul style="list-style-type: none"> This document provides evidence to demonstrate how the socioeconomic and health-related benefits of climate actions for societal wellbeing. The measure applicable to Camden is <i>Energy efficiency retrofit of residential buildings</i>. This document also cross-references to the UN Sustainable Development Goals. <p>Urban Climate Action Impacts framework</p> <ul style="list-style-type: none"> Provides a useful framework for gathering and measuring sustainable development in relation to ‘Climate Action Impacts Taxonomy’ in an urban setting. 														
United Nations (UN)	<p>UN Sustainable Development Goals</p> <ul style="list-style-type: none"> Out of the 17 UN goals, Camden can help achieve 13 of them: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Goal 1 <i>No poverty</i></td> <td style="width: 50%;">Goal 10 <i>Reduced inequalities</i></td> </tr> <tr> <td>Goal 3 <i>Good Health and wellbeing</i></td> <td>Goal 11 <i>Sustainable cities and comm</i></td> </tr> <tr> <td>Goal 4 <i>Quality education</i></td> <td>Goal 12 <i>Responsible consumption and production</i></td> </tr> <tr> <td>Goal 6 <i>Clean water and sanitation</i></td> <td>Goal 13 <i>Climate action</i></td> </tr> <tr> <td>Goal 7 <i>Affordable and clean energy</i></td> <td>Goal 15 <i>Life on land</i></td> </tr> <tr> <td>Goal 8 <i>Decent work and economic growth</i></td> <td>Goal 16 <i>Peace, Justice and Strong Institutions</i></td> </tr> <tr> <td>Goal 9 <i>Industry innovation and infrastructure</i></td> <td></td> </tr> </table> <p>UN Framework Convention on Climate Change (UNFCCC) (1992)</p> <ul style="list-style-type: none"> The UNFCCC sets out to achieve stabilisation of greenhouse gas concentrations in the atmosphere at safe levels. <p>UNFCC Kyoto Protocol (1997)</p> <ul style="list-style-type: none"> The Kyoto protocol commits the UK to specifically set targets to limit or reduce greenhouse gas emissions. The protocol seeks a total cut in 	Goal 1 <i>No poverty</i>	Goal 10 <i>Reduced inequalities</i>	Goal 3 <i>Good Health and wellbeing</i>	Goal 11 <i>Sustainable cities and comm</i>	Goal 4 <i>Quality education</i>	Goal 12 <i>Responsible consumption and production</i>	Goal 6 <i>Clean water and sanitation</i>	Goal 13 <i>Climate action</i>	Goal 7 <i>Affordable and clean energy</i>	Goal 15 <i>Life on land</i>	Goal 8 <i>Decent work and economic growth</i>	Goal 16 <i>Peace, Justice and Strong Institutions</i>	Goal 9 <i>Industry innovation and infrastructure</i>	
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Goal 9 <i>Industry innovation and infrastructure</i>															

	<p>greenhouse-gas emissions of at least 5% from 1990 levels in the commitment period 2008-2012(8% for EU/12.5% for UK).</p> <p>UNFCCC Doha Amendment to the Kyoto Protocol (2012)</p> <ul style="list-style-type: none"> • The Doha amendment to the Kyoto Protocol added a second commitment period to reduce GHG emissions by at least 8% below the 1990 levels in the 8 year period from 2013 to 2020. The UK has agreed to this reduction as part of the European Union.
European Union (EU)	<p>European Landscape Convention 2000</p> <ul style="list-style-type: none"> • Promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention came into force March 2004. <p>Convention for the Protection of the Architectural Heritage of Europe</p> <ul style="list-style-type: none"> • The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage. It establishes the principles of "European co-ordination of conservation policies" including consultations regarding the thrust of the policies to be implemented. <p>European Convention on the Protection of Archaeological Heritage</p> <ul style="list-style-type: none"> • This convention is concerned in particular with arrangements to be made for co-operation among archaeologists and town and regional planners in order to ensure optimum conservation of archaeological heritage. <p>Initial Directive of 1985 85/337/EEC and amendments codified by 2011/92/EU Assessment of the Effects of certain Public and Private Projects on the Environment</p> <ul style="list-style-type: none"> • Establishes the requirements to undertake an Environmental Impact Assessment (EIA) of specified projects likely to have a significant impact on the environment. <p>Renewed EU Sustainable Development Strategy (EU SDS) (2006) and 2009 review; and linkage to the Europe 2020 Strategy and the international SD Agenda</p> <ul style="list-style-type: none"> • Provides a definition of sustainable development “<i>to meet the needs of the present generation without compromising those of future generations.</i>” The priorities are to: combat climate change; ensure sustainable transport; address threats to public health; manage natural resources more responsibly and stop biodiversity decline; combat poverty and social exclusion; and meet the challenge of an ageing population. • The Europe 2020 Strategy was adopted in 2010 to move Europe towards smart, sustainable and inclusive growth. <p>Environment Action Plan to 2020, the 7th EAP that will be guiding European environment policy until 2020</p> <p>Identifies three key objectives:</p>

- to protect, conserve and enhance the Union's natural capital.
- to turn the Union into a resource-efficient, green, and competitive low-carbon economy.
- to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing.

[Directive 1996/62/EC: Air Quality Framework \(1996\) and Daughter Directives \(1999, 2000 & 2002\)- New Air Quality Directive 2008/50/EC](#)

- The Directive set objectives for ambient air pollution and provides a framework for subsequent (“daughter”) Directives to set long-term air quality objectives and limit values for various pollutants to be met by various dates between 2001 and 2010.
- This new (2008) Directive includes the following key elements:
 - that most of existing legislation be merged into a single directive (except for the fourth daughter directive) with no change to existing air quality objectives*
 - -New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target
 - -the possibility to discount natural sources of pollution when assessing compliance against limit values
 - -possibility for time extensions of three years (PM10) or up to five years (NO2, benzene) for complying with limit values, based on conditions and the assessment by the European Commission

[The EU Water Framework Directive \(2000/60/EC\)](#)

- Establishes a comprehensive framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater and promotes more sustainable water management and use.

[Directive 2006/118/EC on the protection of groundwater against Pollution and Deterioration](#)

- This Directive is designed to prevent and combat groundwater pollution. Its provisions include:
 - criteria for assessing the chemical status of groundwater.
 - criteria for identifying significant and sustained upward trends in groundwater pollution levels, and for defining starting points for reversing these trends.
 - preventing and limiting indirect discharges (after percolation through soil or subsoil) of pollutants into groundwater.

[Directive 2008/98/EC on Waste \(The Waste Framework Directive\)](#)

- This sets the basic concepts and definitions related to waste management,

such as definitions of waste, recycling, recovery. The Directive lays down some basic waste management principles: it requires that waste be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest. Waste legislation and policy of the EU Member States shall apply as a priority order the waste management hierarchy.

[Directive 2001/77/EC: Electricity Production from Renewable Energy Sources \(2001\) - Directive 2009/28/EC: Promotion of the use of energy from renewable sources](#)

- The 2001 Directive sets a target for the EU of producing 22% of its overall electricity use from renewable energy sources by 2010 with each Member State having its own target (UK: 10%).
- The 2009 Directive establishes a common framework for the use of energy from renewable sources in order to limit greenhouse gas emissions and to promote cleaner transport. To this end, national action plans are defined, as are procedures for the use of biofuels.

[Directive 2002/49/EC: Environmental Noise](#)

- The Directive places requirements on Member States to assess and manage environmental noise from various sources, including roads and railways. Action plans will have to be drawn up to manage noise issues and effects including noise reduction.

[EU Habitats Directive \(92/43/EC\)](#)

- Member States must take all necessary measures to guarantee the conservation of habitats in special areas of conservation, and to avoid their deterioration.

[European Union Biodiversity Strategy to 2020](#)

- There are six main targets, and 20 actions to help Europe reach its goal. Biodiversity loss is an enormous challenge in the EU, with around one in four species currently threatened with extinction and 88% of fish stocks over-exploited or significantly depleted.
- The six targets cover:
 - Full implementation of EU nature legislation to protect biodiversity
 - Better protection for ecosystems, and more use of green infrastructure
 - More sustainable agriculture and forestry
 - Better management of fish stocks
 - Tighter controls on invasive alien species
 - A bigger EU contribution to averting global biodiversity loss

	<p>EU Birds Directive (79/409/EC) - The Birds Directive 2009/147/EC codified version of Directive 79/409/EEC as amended</p> <ul style="list-style-type: none"> The directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds.
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Table 3: National, Regional and Local Strategies, Programmes, Plans and Policies (see Appendix 1 for more detailed information)

Ref No	Document Title and link
National	
1.	National Planning Policy Framework National Planning Practice Guidance
2.	Securing the future - delivering UK sustainable development strategy (UK Gov, 2005)
3.	Climate change: second national adaptation programme (2018 to 2023)
4.	Climate Change: The UK Programme 2006
5.	Cutting carbon, creating growth: making sustainable local transport happen – Transport white paper January 2011
6.	The air quality strategy for England, Scotland, Wales and Northern Ireland (Volume 1, 2007; Volume 2, 2011)
7.	Our Energy Future, Creating a Low Carbon Economy (Energy White Paper, DTI 2003)
8.	Planning for our electric future: a white paper for secure, affordable, and low-carbon energy (DECC, 2012)
9.	Waste Management Plan for England (DEFRA 2013)
10.	National Planning Policy for Waste (DCLG, 2014)
11.	Tall buildings. Historic England Advice Note 4 (2015)
12.	BREEAM Assessment (BRE 2006)
13.	Biodiversity 2020: A strategy for England's wildlife and ecosystem services - UK Post 2010 Biodiversity Framework
14.	A Green Future: Our 25 Year Plan to Improve the Environment, DEFRA 2018
15.	Working with the Grain of Nature: A Biodiversity Strategy for England

Ref No	Document Title and link
	(2002)
16.	Fair Society, Healthy Lives, The Marmot Review, 2010
17.	Reuniting Health with Planning. Series of publications by TCPA, TCPA 2010 – 2017)
18.	Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites
19.	Planning policy for traveller sites (DCLG, 2015)
20.	The Community Infrastructure Levy Regulations 2010 and amendments 2014
21.	Thames catchment abstraction licensing strategy (Environment Agency, 2014)
22.	Model Procedures for the Management of Contaminated Land (Contaminated Land Report 11) (Environment Agency, September 2004)
23.	Thames Region Catchment Flood Management Plan – Summary Report Environment Agency, 2009
24.	Bringing your rivers back to life – A Strategy for restoring rives in North London (Environment Agency, February 2006)
25.	Conservation Area Designation, Appraisal and Management (Historic England, 2016)
26.	Streets for All: London (Historic England, 2018)
27.	Heritage Works – A toolkit of best practice in heritage regeneration (Historic England, 2017)
28.	The Setting of Heritage Assets – 2nd Edition (Historic England, 2017)
29.	Local Green Infrastructure: Helping communities make the most of their landscape, September 2011
30.	Historic England Advice Note 3: Site Allocations in Local Plans, 2015
London	
31.	The London Plan 2016
32.	The Mayor's Transport Strategy 2018
33.	Draft Economic Development Strategy, 2017
34.	London Housing Strategy, 2018
35.	London Environment Strategy 2018
36.	London Health Inequalities Strategy, 2018

Ref No	Document Title and link
37.	London Sustainable Drainage Action Plan, 2016
38.	London Infrastructure Plan 2050
39.	All London Green Grid, 2012
40.	Accessible London: Achieving an inclusive environment, 2014
41.	The Mayor's Housing SPG 2016
42.	The Mayor's Sustainable Design and Construction SPG, 2014
43.	Social Infrastructure SPG, 2015
44.	Shaping neighbourhoods: play and informal recreation, 2012
45.	Shaping neighbourhoods: Character and context, 2014
46.	London View Management Framework SPG (March 2012)
Local	
47.	Camden 2025
48.	Our Camden Plan
49.	Camden Local Plan, 2017
50.	Camden Planning Guidance
51.	Fitzrovia Area Action Plan, 2014
52.	Euston Area Plan, 2015
53.	Conservation Area Appraisal and Management Strategies
54.	Camden Character Study
55.	Camden and Islington Strategic Housing Market Assessment, ORS 2016
56.	Financial Viability Study, BNP Paribas 2016
57.	Employment Land Study, URS 2014
58.	Camden Retail and Town Centre Study 2013 - GVA
59.	Kentish Town Regis Road Employment Area Growth Study, Aecom 2015
60.	Infrastructure Study Update, URS 2015
61.	Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014
62.	Camden Strategic Flood Risk Assessment (SFRA), 2014
63.	London Borough of Camden Annual Monitoring Reports
64.	Camden Housing Strategy 2011-2016

Ref No	Document Title and link
65.	Camden Equality Objectives (2016)
66.	Green Action for change – Camden’s Sustainability plan 2011 - 2020
67.	Camden’s Clean Air Action Plan 2016-2018
68.	Camden Transport Strategy (LIP) 2011-2031
69.	The Camden Biodiversity Action Plan 2013 – 2018
70.	Review of Sites of Importance for Nature Conservation (SINC), London Wildlife Trust 2014
71.	Borough Wide Heat Demand and Heat Source Mapping, Buro Happold 2015
72.	Annual School Places Planning Report (Primary and Secondary) 2017
73.	Camden Open Space, Sport and Recreation Study Review; Atkins; 2014
74.	Camden’s Joint Strategic Needs Assessment 2013

STAGE A2: Baseline information

Baseline information can be used to predict and monitor effects and forms a key determinant in identifying the sustainability issues and ways of taking them into account. This section presents an overview of the baseline information that is considered to be of most relevance to the Site Allocations.

Most information will be broad and relate to the wider local authority area. There is a great deal of available information and demographic and statistical indicators that could be listed, but as stated in SEA guidance the level of information should be relevant and appropriate to the spatial scale of the plan (The Practical Guide to Strategic Environmental Assessment, 2005).

The baseline topics and issues listed are intended to correlate as closely as possible with indicative SEA Directive and guidance headings of: population and human health, biodiversity, fauna and flora, soil, water, air, climactic factors, material assets and cultural heritage and landscape. There will inevitably be a degree of interrelationship between the issues.

Whilst identifying current baseline data and trends may be relatively straightforward, there will be underlying uncertainty in projecting analysis so far forward on the basis of current information available. Any identified trends will tend to be short to medium

term. There may be significant changes to Camden as a whole in the longer term, which cannot be accurately predicted or forecast.

This highlights the need to monitor and review the baseline information periodically after the SA has been completed.

Summary of the baseline

The baseline information has been collected under a number of subtopics, which can be classified as environmental, social or economic. To demonstrate how the SEA topic areas (as set out in Annex 1 of the SEA Directive) have been covered, these are included in brackets beside the relevant SA subtopic as follows:

Environmental

- Transport and traffic (*air, human health, climatic factors*)
- Cultural heritage and landscape (*cultural heritage, landscape*)
- Open space (*landscape, human health*)
- Biodiversity, flora and fauna (*biodiversity, flora and fauna*)
- Air quality (*air, human health, climatic factors*)
- Soil (*soil, human health*)
- Water and flooding (*water, climatic factors*)
- Noise and vibration (*population, human health*)
- Climate factors (*climatic factors*)
- Recycling and waste management (*population, human health, water*)
- Development on previously developed land (*material assets, soil*)

Social

- Population (*population*)
- Health and community (*human health*)
- Deprivation and social exclusion (*population*)
- Education (*population*)
- Housing (*material assets, population*)

Economic

- Town centres and Employment

Under each of these subtopics, a number of baseline indicators have been identified. It is these indicators that have been used to describe the baseline situation and will be used to measure the performance of the Site Allocations against the SA objectives. **Table 4** below shows the indicators that describe the various elements of Camden's environment. These have been selected as it was considered that they provided a comprehensive picture of the borough as it is now and would be able to be monitored in the future to measure the progress of the Site Allocations in achieving sustainable development.

Table 4: Baseline Indicators

Environmental indicators	
Transport and traffic	<ul style="list-style-type: none"> • Number of agreements signed for car-free or car capped housing • Motor traffic flows through the borough • Proportion of resident trips by walking or cycling
Cultural heritage and Landscape	<ul style="list-style-type: none"> • Conservation areas • Designated and non-designated heritage assets • Heritage at risk • Extent of archaeological priority zones • Number and condition of scheduled ancient monuments
Open space	<ul style="list-style-type: none"> • Open spaces • Open space deficiency
Biodiversity, flora and fauna	<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 and other sites of special biodiversity value, such as open spaces
Air quality	<ul style="list-style-type: none"> • Carbon dioxide (CO₂), Nitrogen dioxide (NO₂) and particulate matter (PM₁₀) emissions
Soil	<ul style="list-style-type: none"> • Number of sites of potential land contamination

Water and flooding	<ul style="list-style-type: none"> • Water quality • Water use • Number of properties at risk from 1% and 0.1% • Floods
Noise and vibration	<ul style="list-style-type: none"> • Number of noise complaints received by the Council • Number of important areas 'noise hotspots' defined by Defra
Climate factors	<ul style="list-style-type: none"> • Carbon dioxide emissions • Climatic events • Proportion of energy generated from renewable sources • Domestic energy efficiency
Recycling and waste management	<ul style="list-style-type: none"> • % of household waste recycled
Development on previously developed land	<ul style="list-style-type: none"> • Housing on previously developed land
Socio-economic indicators	
Population	<ul style="list-style-type: none"> • Population by age and sex • Population by ethnic group • Population by place of birth • Population growth • Household size and composition • Population density (persons/ha)
Health and community	<ul style="list-style-type: none"> • Healthy life expectancy • Major causes of death • People using outside space for health/exercise • Proportion of active adults • Excess weight in adults • Excess weight in 4-5 and 10-11 year olds • Air quality health impacts • Camden Primary healthcare estate

	<ul style="list-style-type: none"> • Care homes for older people • Care homes for mental health • Levels of crime • People with limiting long term illness
Deprivation and social exclusion	<ul style="list-style-type: none"> • Household income • Number of Super Output Areas (SOAs) within 10% most deprived in England • Life expectancy • Fuel poverty • Claimant count unemployment rate • Households with children in families on key benefit
Education	<ul style="list-style-type: none"> • Area of new education facilities created • School capacity (pupil place calculation) • Number of NEET's (young people not in education, employment and training)
Housing	<ul style="list-style-type: none"> • Housing stock by tenure • Dwellings by type • Overall need • House prices and rents • Ratio of average house price to earnings • Houses with special needs • Number of new homes completed • Traveller pitches • Student housing completions • Affordable housing completions • Mix of housing sizes • Vacant housing units
Town Centres and Employment	<ul style="list-style-type: none"> • Completed retail, food, drink and entertainment floorspace • Vacancy in town centres and other designated frontages • Retail, food, drink and entertainment uses • Employment floorspace completed and available • Growth areas projected floorspace

	<ul style="list-style-type: none"> • Industrial structure and key sector • Supply of employment land • Change in VAT registered businesses • Number of secured apprenticeship in Camden
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Appendix 2 provides the detailed identified baseline information.

Baseline Information

Some baseline gaps existed for the Local Plan SA. These indicators have been either altered or removed where appropriate for the updated baseline collection of the Site Allocations. As this is the preliminary stage in the SA process, it is possible that additional sources may be discovered through consultation. Should this be the case, the baseline will be updated accordingly.

Stage A3: Identifying key sustainability issues for the Site Allocations to address

Having reviewed the relevant plans and programmes (**Appendix 1**) and identified baseline information (**Appendix 2**) the main sustainability issues that have emerged are shown in **Table 5** below.

Table 5: Sustainability issues

Issue	Summary and Source of Evidence
Environmental	
Development pressures and the protection of Camden's heritage	<p>There are 40 conservation areas, 5645 listed buildings, 12 Registered Parks and Gardens and 1 Scheduled Ancient Monument in Camden (<i>LBC Conservation & Historic England</i>). Camden's Local List identifies historic buildings and features that are valued by the local community.</p> <p>Camden's Local Plan records 13 Archaeological Priority Areas in the borough. Draft HE Appraisal of APA's in Camden recommends 18 APA's of differing risk levels.</p> <p>Conservation Areas are important in protecting the key elements</p>

Issue	Summary and Source of Evidence
	<p>of our cultural heritage and should be conserved and enhanced. Inappropriate development in such areas can significantly harm their character and appearance.</p> <p>There is high number of designated and non-designated heritage assets in Camden. The Council needs to ensure that requirements to meet housing and employment needs do not cause harm to the significance of heritage assets and where possible enhances their character and appearance.</p>
Need to reduce carbon dioxide emissions to meet the borough's target	<p>Camden has a set target to reduce carbon dioxide emissions by 80% 2050 (2005 baseline). Latest data from Committee on Climate Change suggests that per capita emissions will be close to the 2017 target. (Green Action for Change, Fifth Annual Review, 2017).</p> <p>It is important the borough continues to push energy efficiency measures – by improvements to existing stock and continued reductions in new developments, passive (non-mechanical) measures should be the primary focus.</p>
Limited scope for creating new open space	<p>The majority of new development in the borough occurs on previously developed land and the fact that there is a significant shortage of available land for development and therefore limited scope for creating new open space.</p> <p>The areas of greatest deficiency are in the following parts of the borough: Central London East; SE and NW of Hampstead and Highgate; Kentish Town area; east of Regent's Park area; and SW of Somers Town area.</p> <p>The largest access deficiencies for children's play provision are located in the following wards: Fortune Green, Kilburn, Belsize, Camden Town with Primrose Hill, Kentish Town, Holborn and Covent Garden, Haverstock, Hampstead, Frognal and Fitzjohns.</p> <p>(Open Spaces Needs Assessment Report, 2014)</p>
Poor air quality	<p>Camden has some of the poorest air quality in Europe, especially in the south of the borough where traffic congestion is severe. Since 2000, the whole borough is designated an Air Quality Management Area.</p>

Issue	Summary and Source of Evidence
	<p>2015 6.3% mortality attributable to particulate air pollution. Particulates are linked to health problems including asthma, lung cancer and cardiovascular illness. Nitrogen Oxides are linked with emphysema, bronchitis and heart disease.</p> <p>The key areas linking planning and air quality are road transport, construction, energy generation, and the operation of certain industrial processes. Each serves as a source of pollution emissions that should be mitigated. It is important that the planning system plays its part in helping reduce emissions in the borough. Camden is working to address this issue by: reducing transport emissions, reducing emissions from buildings and new developments.</p> <p>Camden's Air Quality Action Plan 2016 – 2018 Camden Public Health Outcomes Framework 2017</p>
Potential contamination on previously developed land	<p>While no sites in the borough are currently designated as contaminated for the purposes of the Environment Act 1990 Part II A, numerous sites in the borough has been previously utilised for heavy industry and other polluting uses and this may pose contamination problems for future development on such sites, especially given the trend for building on previously developed land</p> <p><i>(Environmental Health, Camden)</i></p>
Risk of surface water and groundwater flooding in parts of the borough	<p>Although there are no areas at risk of flooding from rivers or the sea there are approximately 38,800 properties in the Camden within areas at risk of surface water flooding at potential depths of >0.1m, and 12,700 properties in areas at risk of flooding to potential depths of >0.3m. (Environment Agency)</p> <p>The proportion of developed land (impermeable surfaces) in Camden increases surface water flooding risks, so its important that development considers appropriate measures of drainage.</p> <p>In August 2002, widespread surface water flooding occurred in the north of the borough in West Hampstead and Kentish Town. The topography of Hampstead and the nature of summer</p>

Issue	Summary and Source of Evidence
	<p>thunderstorms make high rainfall and associated flooding events likely in Camden.</p> <p>There are 12 Local Flood Risk Zones in Camden. They do not exceed national criteria for flood risk but can still affect homes, businesses, and infrastructure. (Camden SFRA 2014). Historic watercourses and previously flooded streets (Map 6 Camden Local Plan).</p> <p>There is a small risk of groundwater flooding in Camden, which takes two principal forms.</p> <ul style="list-style-type: none"> • Most common is ‘perched’ groundwater. The risk of this type of flooding is difficult to model but has been recorded in parts of the borough, notably Kilburn, Fortune Green and West Hampstead, • Aquifer based groundwater flooding is rare in Camden, but it is possible in areas around Hampstead Heath and in the very south of the borough.
Water supply and use	<p>Camden is within Thames Water’s London Water Resource Zone which is classified as ‘seriously water stressed.’ This means there is a high population with high water demands and limited water availability.</p> <p>Currently water use accounts for 27 percent of all carbon emissions from our homes. In London non-households accounts for 29 percent of water consumption and this is therefore an area where further water and carbon savings can be made.</p> <p>Environment Agency</p>
Water quality and environmental impact	<p>Camden has groundwater source protection zones I & II. Special Protection Zones have been produced to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. It is for this reason that certain development types may be deemed unacceptable where they pose a risk of contamination to groundwater. High polluting activities, such as petrol stations or cemeteries should be directed away from SPZ1. Further guidance can be found on our website at https://www.gov.uk/government/publications/groundwater-source-protection-zones Potential site allocations in SPZ should</p>

Issue	Summary and Source of Evidence
	<p>follow guidance and advice from Environment Agency.</p> <p>The Grand Union canal has moderate status which is a change from good in 2009 (following further investigation) and the Regents canal remains at moderate status due to mitigation measures not yet in place which would make the watercourse more natural. (Please see Water Framework Directive and Thames River Basin Management Plan)</p> <p>(Environment Agency)</p>
Concern over decline in priority species	<p>Camden Biodiversity Action Plan identified priority species. Need to ensure that priority species do not further decline in the borough and receive adequate protection and encouragement through the planning process.</p> <p>There are 4.56ha of sites that are managed for nature conservation. Existing Sites of Important Nature Conservation provide important habits for priority species and other flora and fauna in the borough, which need to be protected from future development.</p>
Increased pressure on waste management facilities	<p>The increase in the borough's population in the future will place increased pressure on existing waste management facilities and highlights the need to ensure waste is managed efficiently and where possible reduced, reused and recycled.</p>
Social	
Providing suitable housing for a growing population	<p>The number of people living in Camden is increasing and the makeup of the borough's population is changing. Camden Local Plan aims to meet need of existing and future households by exceeding a target of 16,800 additional homes 2016/17 - 2030/31, including 11,130 additional self-contained homes.</p> <p>The GLA population projections forecast growing proportion in the 65 plus age group, a changing age structure with fewer younger children.</p> <p>Housing need includes these groups in Camden: general needs housing, accommodation for students, older and vulnerable people and traveller accommodation.</p>

Issue	Summary and Source of Evidence
<p>The affordability of housing and the supply of affordable housing in Camden</p>	<p>The ratio of average house prices to average earnings for Camden in 2017 was 18.97 (i.e. average house prices are 18.97 times median earnings). This compares with 13.24 across London overall, and 7.77 across England and Wales. The cost of housing relative to income is a major issue for Camden.</p> <p>The Council aims to exceed a borough strategic target of 5,300 additional affordable homes 2016 – 2031 with a mix of housing types.</p> <p>In the three years 2012/13 to 2014/15 Camden secured 37% affordable housing, above the average for London (28%). In 2015/16, 182 net affordable dwellings were completed, 19% of all net additional self-contained homes completed in the Borough.</p>
<p>Wide disparities between deprived and affluent areas in the borough</p>	<p>There are wide disparities of deprivation and affluence within Camden wards.</p> <p>Camden's mean annual household income is higher than that of Greater London's average, but there is significant disparity between wards within Camden.</p> <p>Camden has seen a mixed change since the 2010 Index of Multiple Deprivation to 2015 data (less deprived in some measures and more deprived in others. There are very wide disparities within the Borough and wards.</p> <p>Of the London boroughs Camden has the fourth highest percentage of children (under 16 years) in low income families. At Ward level (all children) the wards experiencing the highest level of low income families are: St Pancras and Somers Town, Haverstock, King's Cross, Regent's Park, Kilburn. (HMRC HBAI 2015 (published February 2018).</p>
<p>Large health inequalities within Camden</p>	<p>People suffering from poor general health, mental ill health and low life expectancy are generally concentrated in the borough's most deprived wards including St Pancras and Somers Town, Haverstock and Kilburn.</p> <p>For local health and wellbeing it is important that Camden</p>

Issue	Summary and Source of Evidence
	<p>continues to provide measures to help reduce car use and promote more sustainable and active forms of travel.</p> <p>Camden Joint Strategic Needs Assessment, 2013</p>
Economic	
Significant disparities in employment	There are significant disparities in employment between different wards in Camden, in that some wards in Camden rank very high in unemployment, whereas others rank very low. (DWP Claimant Count, December 2017).
Ensure range of provision for employment clusters to accommodate need	<p>The key employment sectors experiencing growth are: professional, scientific and technical, business administration and support, and health. The employment sector with the greatest proportionate decrease has been manufacturing and transport storage. (Employment Land Review, 2014).</p> <p>Science and technology employment sector has grown significantly in Camden (one third of jobs in the borough, which is the highest concentration of any LA area in the UK).</p>
Balancing the demand for housing with the protection of employment land	<i>AMR</i> data suggests land use pressures and conflicts between uses, particularly the demand for housing development over all other land uses and the potential threat this creates for employment generating land uses.

Stage A4: Developing the SA framework consisting of SA objectives and indicators

The SA objectives in **Table 6** have been developed from the previous SA objectives used during the sustainability appraisal of the Local Plan and updated where changes in the sustainability issues have been identified above in **Table 5** and the review of the relevant plans, policies and programmes.

The criteria will then go on to point towards detailed indicators and targets that should be applied in developing the SA framework as part of the next stages of the SA. These indicators and targets have been drawn from the baseline information collected at Stage A2 of the SA process, as well as the relevant plans, policies and programmes, as set out in Table 2 and Appendix 1. Camden's Annual Monitoring Report (AMR) has been particularly important in identifying indicators, as this will play an important role in the monitoring and in achieving sustainable development.

Where possible and appropriate, any additional suitable indicators identified through this SA process will be added to the AMR to enable their effective monitoring.

Table 6: Sustainability Appraisal objectives and criteria

Ref.	Draft SA objective	Sub-criteria Will the Site Allocations Plan...	SEA Topic
Social			
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> a) Provide adequate housing completions to meet local needs b) Protect and promote affordable housing development c) Provide housing for people, particularly families, on moderate and lower incomes? d) Encourage development at an appropriate density, standard, size and mix? e) Provide everybody with the opportunity to live in a better home? 	Population, Material assets,
2	To promote a healthy community	<ul style="list-style-type: none"> a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles? b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive? c) Support health providers and commissioners to fulfil their strategic estates plans? d) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)? 	Population, Human health,
3	To tackle poverty and social exclusion and promote equal	<ul style="list-style-type: none"> a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups? 	Human health, Population

Ref.	Draft SA objective	Sub-criteria Will the Site Allocations Plan...	SEA Topic
	opportunities	<ul style="list-style-type: none"> b) Provide for equality of access for all to buildings and services? c) Encourage development opportunities in those areas in need of economic development? 	
4	To improve amenity by minimising the impacts associated with development	<ul style="list-style-type: none"> a) Ensure that the amenity of neighbours is not unduly impacted? b) Ensure that development and operations will not affect noise sensitive uses? 	Human health
Environmental			
5	To conserve and improve open space provision	<ul style="list-style-type: none"> a) Help to protect, increase/improve open space? 	Biodiversity, flora and fauna, Human Health, Landscape
6	To improve local air quality and limit exposure	<ul style="list-style-type: none"> a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage the use of alternative modes of transport to the private car? 	Human health, Air
7	To promote the efficient use of energy, water and other natural resources, throughout the life of the development	<ul style="list-style-type: none"> a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? 	Climatic factors, Soil, Human health

Ref.	Draft SA objective	Sub-criteria Will the Site Allocations Plan...	SEA Topic
		f) Encourage sustainable design and construction?	
8	To protect and manage water resources (including groundwater) and reduce surface water flood risk	a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Take into account potential flood risk? d) Promote the protection and enhancement of the quality of Camden's waterways?	Water, Biodiversity, flora and fauna, Soil, Population
9	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan? b) Provide for the protection of biodiversity and open space in the borough? c) Prevent habitat fragmentation and increase connectivity through habitat corridors? d) Protect and provide for the protection and planting of more trees in the borough?	Biodiversity, flora and fauna, Human health
10	To promote high quality and sustainable urban design	a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Ensure enhancement of the public realm and local distinctiveness? c) Encourage the use of sustainable design and construction methods?	Cultural heritage, Climatic factors
11	To protect and enhance the historic environment	a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?	Cultural heritage

Ref.	Draft SA objective	Sub-criteria Will the Site Allocations Plan...	SEA Topic
Economic			
12	To ensure new development makes efficient use of land, buildings and infrastructure	a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?	Material assets, Soil,
13	To encourage and accommodate sustainable economic growth and employment opportunity	a) Encourage the retention and growth of existing, locally based industries? b) Accommodate new and expanding businesses? c) Encourage new investment in the local economy and promote development opportunities for employment? d) Focus growth in growth areas and other highly accessible locations?	Material assets, Population

Stage A5: Consulting the relevant authorities on the scope of the SA

Consultation on the SA Scoping Report

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

- The Environment Agency
- Natural England
- Historic England

We are now at the stage where we wish to obtain the views of these agencies. Consultation at this stage will help to make sure that the SA will be as comprehensive and robust as possible and meet statutory requirements.

It is available for consultation for a period of five weeks in order to comply with the SEA Regulations (*The Environmental Assessment of Plans and Programmes Regulations 2004*, 12(6)).

In seeking comments on this report, we have asked consultees to consider the following questions.

Q. 1 Is the approach taken, in using the format of the 2017 Local Plan SA Scoping report as a basis for the Site Allocations SA Scoping Report considered to be appropriate?

Q.2 Is the document clearly structured and does it cover the main issues in an understandable way?

Q.3 Is the review at Tables 2 and 3 and Appendix 1 of other plans, programmes and sustainability objectives sufficient for the purposes of this document? Are there any other relevant plans, programmes and sustainability objectives that should be taken into account?

Q4 Do you consider that the range of baseline information at Appendix 2 is appropriate and/or are there any further baseline indicators that might provide useful information and where might they be sourced?

Q.5 Do you consider that the main sustainability issues have been satisfactorily identified from the baseline information?

Q.7 Do you consider that these proposed SA objectives are sufficient and adequately reflect the key sustainability issues?

Q.8 Do you have any other data, comments or suggestions that you think may be useful to inform the Sustainability Appraisal?

Following the period of consultation any comments on the Scoping Report will be considered and used to look at how the proposed SA should be revised to respond to them.

The emerging draft objectives of the Site Allocations will be tested against the SA objectives set out in this Scoping Report. This will allow an assessment of the relationship between the Site Allocations objectives and sustainability objectives, and highlight any issues or inconsistencies.

Following from an assessment of the relationship between the Site Allocations and sustainability objectives, an appraisal of emerging options for the Site Allocations will be carried out. The draft SA Report will then be produced (which will include an assessment of the options appraised), which will then be subject to public consultation. The Final SA Report will be published alongside the (pre-submission) version of the Site Allocations.