

Camley Street Neighbourhood Development plan Basic Conditions Statement

1 Introduction

1.1 This Statement has been prepared by Camley Street Neighbourhood Forum (the Qualifying Body) to accompany its submission to the local planning authority, the London Borough of Camden (LBC), of the Camley Street Neighbourhood Development Plan (“the Neighbourhood Plan”) under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (“the Regulations”).

2 The Basic Conditions

2.1 Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) [excluding 2b, c, 3 to 5 as required by 38C (5) of the Planning and Compulsory Purchase Act 2004 (as amended)], states that a draft Plan meets the ‘basic conditions’ where it:

- Has regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contributes to the achievement of sustainable development;
- It is in general conformity with the strategic policies of the development plan for the area;
- It is compatible with human rights requirements and
- It is compatible with and does not breach European Union (EU) obligations.

2.2 The following Basic Conditions Statement addresses each of the four Basic Conditions and demonstrates how the proposed Camley Street Neighbourhood Development Plan (CSNDP) meets the requirements outlined in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act, 1990.

3 Legal Requirements Compliance Statement

3.1 The Camley Street Neighbourhood Forum and Neighbourhood Area was designated in February 2014, following a period of consultation between October and December 2013 (Please refer to Figure 1). The Forum has recently been re-designated on 10th May 2019.

3.2 All of the documents required by Part 5, Paragraph 15 of the Regulations are included in the submission package for the Neighbourhood Plan. The requirements include provision of the following:

- A map or statement which identifies the area to which the proposed neighbourhood development plan relates;
- A consultation statement;
- The proposed neighbourhood development plan; and
- Statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of schedule 4B to the Town and Country Planning Act, 1990 (as amended) (the Basic Conditions Statement).

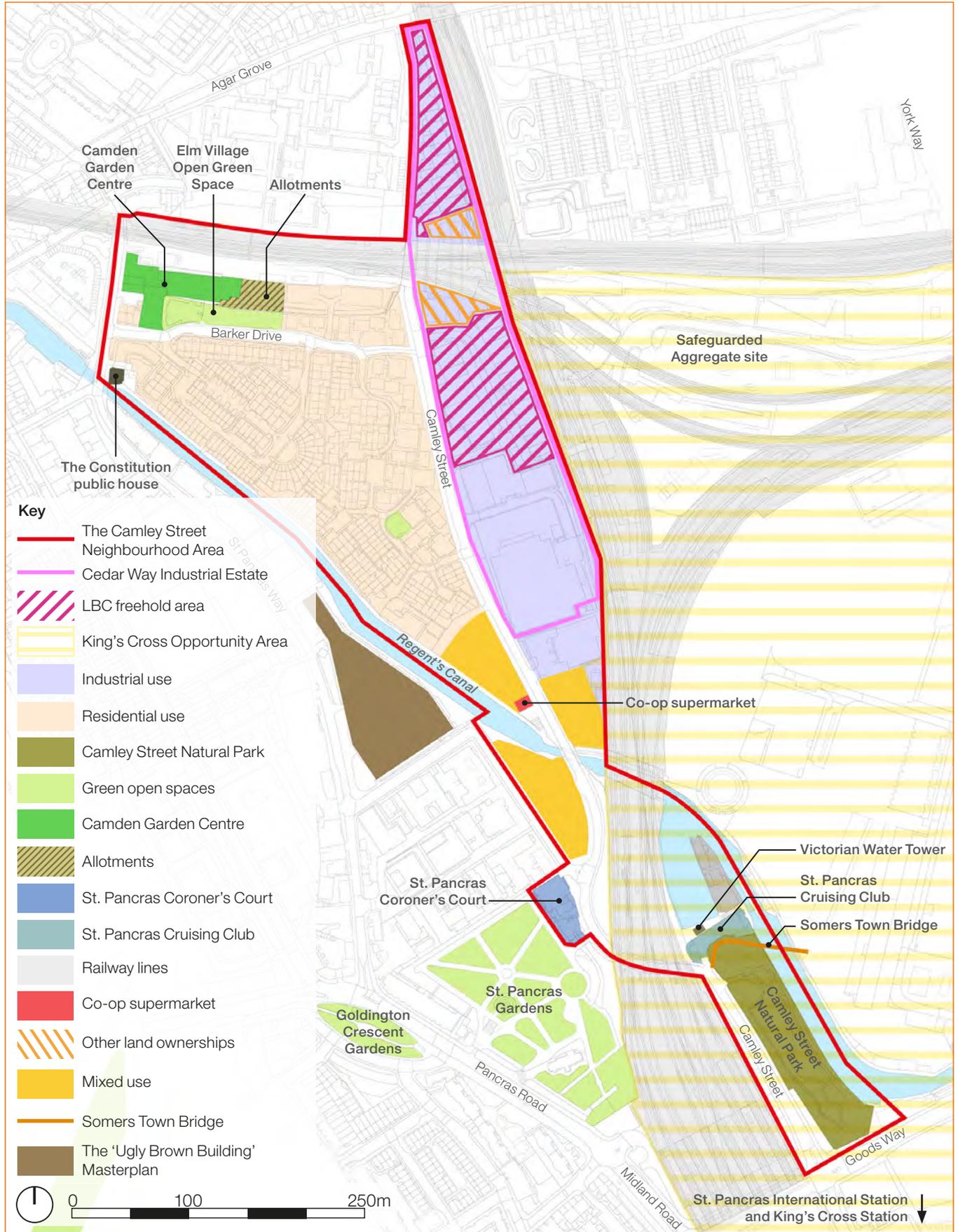
3.3 As stipulated within the Localism Act 2011, Schedule 38B, paragraph 1, a Neighbourhood Development Plan must:

- 1) Specify the period for which it is to have effect;

- 2) May not include provision about development that is excluded development;
and
 - 3) May not relate to more than one neighbourhood area.
- 3.4 The Neighbourhood Plan and the policies within it relate to only to the development and use of land within the designated Neighbourhood Area (please refer to Figure 1). The plan period is proposed from 2019 until 2034. The Plan does not propose any policies relating to excluded development, in accordance with the regulations.

The Camley Street Neighbourhood Area

The Neighbourhood Area was formally re-designated by LB Camden in May 2019. The extent of the Neighbourhood Area is shown on the map below.



(NB: Land ownership boundaries are not exact)

4 Camley Street Neighbourhood Development Plan Proposal

4.1 The Forum's key objectives for future development within the Neighbourhood Area are set out within the Vision Statement (CSNDP Page 17):

'Adjoining the Regent's Canal and located between Camden Town and King's Cross, the Neighbourhood Plan area will be transformed into a mixed community providing a range of industrial and commercial spaces, new dwellings, and new social and community infrastructure. New development over the plan period within the mixed use area identified will cumulatively deliver a number of objectives including, but not limited to the following objectives: satisfy the needs of the current business occupiers, create additional space for new businesses, safeguard existing employment opportunities and create new ones, and provide new homes, with a minimum of 50% affordable housing, plus community facilities and services that will support the existing and new communities. Development will utilise innovative and eco-friendly building design and technology, with green infrastructure integrated throughout.'

4.2 The vision is supported by six 'core objectives', which are broken down further into a number of sub-objectives and provide a framework for the proposed policies.

<u>Core Objective</u>		<u>Sub-Objective</u>
1: Employment	Development will ensure that the neighbourhood's existing employment function and a place that supports a diverse and rich mix of light industrial businesses will continue. Opportunities will be created to enable the existing business community to flourish and grow. New space will be provided that will be capable of attracting a wide range of additional light industrial and other commercial occupiers.	1: The Cedar Way Industrial Estate currently provides space for food production and storage, serving the needs of the restaurant and hospitality industries across London. This specialism performs a function of strategic importance at the regional scale and should be safeguarded.
		2: London is witnessing a shift from traditional office accommodation to more informal workspaces, offering greater flexibility and opportunities for collaboration with other organisations; this culture is compatible with the vision for the Neighbourhood Plan area and such spaces should be considered within the context of any mixed-use redevelopment proposals. In particular employment floorspace for start-ups and SMEs will be encouraged.
		3: Working from home is compatible with sustainable development on account of reducing the demands on transport infrastructure at busy times and providing a human presence in the community during the day. Residential units should be designed in such a way that working from home is a realistic choice.
2: Local Community	Development will increase opportunities for social activity and interaction.	1: All development should protect and enhance existing social infrastructure and facilities.

and Social Needs		2: All major development proposals should contribute towards improved facilities for social interaction.
3: Housing	Development will deliver a significant number of new homes to suit a variety of people. Development will be required to deliver mixed building typologies that enable existing and new light industrial and other commercial functions and high quality, affordable and well-designed new homes to co-exist and thrive.	<p>1: All new development should provide the maximum viable number of dwellings for rent at affordable levels.</p> <p>2: All new development should provide a range of housing types including prioritising housing for families (3+ beds).</p> <p>3: There is a recognised need for affordable housing across London and within the Neighbourhood Area, including larger units suitable for families. As such, the Forum will seek to limit the amount of additional purpose-built student blocks in the area.</p> <p>4: Mixed use proposals should incorporate innovative building typologies that support the provision of new forms of mixed residential and light industrial floorspace.</p>
4: Sustainable Transport	Development will support and promote sustainable transportation for all uses throughout the Neighbourhood Area.	<p>1: Major new development should promote cycling by providing cycle storage/parking in line with Local Plan requirements.</p> <p>2: Walking and cycling should be promoted by: reinforcing desire lines through traffic calming measures, improving the legibility of road signage, making routes safer by encouraging street activity such as active ground floor frontages, better street lighting and other public realm improvements.</p> <p>3: New development should seek to integrate into the wider public transport network and where possible, support new connections and facilities.</p> <p>4: Proposals for mixed use development, including light industrial uses, should seek to reduce and manage the impact of industrial traffic on the local transport network in order to successfully integrate industrial uses and minimise conflicts with residential uses.</p> <p>5: Intensified and new light industrial uses should utilise sustainable modes of transport as far as possible and demonstrate how this has been achieved.</p>
5: Green Infrastructure	Development will increase the range and quality of and accessibility to green spaces in the Neighbourhood Area.	1: To protect and enhance all existing amenity and green spaces including the designated green spaces at Camley Street Natural Park and Elm Village Open Space.

		2: The current green infrastructure network should be enhanced and provision for new connections encouraged, through informal planting opportunities such as green verges, trees and parks of varying shapes and sizes.
		3: To provide and improve connections to existing green spaces outside the Neighbourhood Area boundary.
		4: To promote biodiversity net gains throughout the Neighbourhood Area.
6: Design Quality	Development will be of high design quality, will be ambitious in terms of its and environmental credentials, will seek to maximise the opportunity to improve accessibility and legibility into and through Neighbourhood Area, will improve the safety and convenience for pedestrians and cyclists and will preserve and enhance the area's existing positive features, including all designated and non-designated heritage assets.	1: All new development should be of the highest design quality and accessible to all.
		2: Proposals within the Neighbourhood Area must look at improving connectivity, creating new accessible links to the canal via east-west routes.
		3: Way-finding and accessibility should be improved through design measures such as well-designed signage, street furniture and good lighting.
		4: Minimum London and Local Plan sustainable design standards should be achieved and exceeded in order to mitigate against climate change and future proof the Neighbourhood Area.
		5: Proposals should explore new building typologies that can contribute towards delivering high-quality integrated mixed-use developments.
		6: Tall building proposals must be sustainable, appropriate and well designed.

4.3 The CSNDP contains 14 policies to help guide future development within the Neighbourhood Area and deliver the core objectives:

- CS EM1 Employment Floorspace Provision
- CS EM2 Retention of Existing Businesses
- CS CSN1 Social Infrastructure Provision
- CS HO1 Affordable Housing Provision
- CS HO2 Residential Provision in Mixed Use Development
- CS HO3 Student Accommodation
- CS TR1 Managing Industrial Traffic
- CS TR2 Encouraging Walking and Cycling
- CS GI1 Protection and Enhancement of Existing Open Space

- CS GI2 New Open Space Provision
- CS GI3 Promoting Biodiversity
- CS DQ1 Responding to Places
- CS DQ2 Connectivity, Accessibility and Legibility
- CS DQ3 Proposals for Tall Buildings

4.4 The table below sets out the proposed policies and how they accord with the six core objectives:

<u>Core Objective</u>	<u>Sub-Objective</u>	<u>Policy</u>
Employment	SO 1	CS EM2 Retention of Existing Businesses
	SO2	CS EM1 Employment Floorspace Provision
	SO3	CS EM1 Employment Floorspace Provision
Local Community and Social Needs	SO1	CS CSN1 Social Infrastructure Provision
Housing	SO1	CS HO1 Affordable Housing Provision & CS HO2 Residential Provision in Mixed Use Development
	SO2	CS HO1 Affordable Housing Provision & CS HO3 Student Accommodation
	SO3	CS HO3 Student Accommodation
Sustainable Transport	SO1	CS TR2 Encouraging Walking and Cycling
	SO2	CS TR2 Encouraging Walking and Cycling
	SO3	CS TR1 Managing Industrial Traffic
	SO4	CS TR1 Managing Industrial Traffic
	SO5	CS TR2 Encouraging Walking and Cycling
Green Infrastructure	SO1	CS GI1 Protection and Enhancement of Existing Open Space
	SO2	CS GI2 New Open Space Provision
	SO3	CS GI2 New Open Space Provision
	SO4	CS GI3 Promoting Biodiversity
Design Quality	SO1	CS DQ1 Responding to Places & CS DQ3
	SO2	CS DQ2 Connectivity, Accessibility and Legibility
	SO3	CS DQ2 Connectivity, Accessibility and Legibility

	SO4	CS DQ1 Responding to Places & CS DQ2 Connectivity, Accessibility and Legibility
	SO5	CS DQ1 Responding to Places & CS DQ3 Proposals for Tall Buildings

5 Compliance with the Basic Conditions

5.1 Regard to national policies and advice contained in guidance issued by the Secretary of State

5.1.1 National Planning Policy for England is set out within the National Planning Policy Framework (NPPF), was published in July 2018 and subsequently updated in February 2019. The NPPF provides a consolidated framework of the Government’s planning policies and guidance and how they should be applied appropriately.

5.1.2 The Government published Planning Practice Guidance (PPG) in March 2014, which replaced the majority of Government Circulars. PPG provides more detailed planning advice on various topics within the NPPF including Neighbourhood Planning. The Guidance has been updated where necessary to reflect the 2019 Framework.

5.1.3 The NPPF, Paragraph 29 states “Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”¹

5.1.4 The following section demonstrates how the CSNDP has had regard to the following relevant chapters within the NPPF:

- Chapter 2: Achieving Sustainable Development
- Chapter 5: Delivering a Sufficient Supply of Homes
- Chapter 6: Building a Strong and Competitive Economy
- Chapter 8: Promoting Healthy and Safe Communities
- Chapter 9: Promoting Sustainable Transport
- Chapter 11: Making Effective Use of Land
- Chapter 12: Achieving Well-Designed Places
- Chapter 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Chapter 15: Conserving and Enhancing the Natural Environment
- Chapter 16: Conserving and Enhancing the Historic Environment

NPPF Chapter/Policy Objectives	Camley Street Neighbourhood Development Plan Response
Chapter 2 Achieving Sustainable Development	

¹ Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.

<p>Chapter 2 begins by stating that the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p>In pursuit of this purpose it goes on to confirm that the planning system has three overarching objectives: an economic objective (to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure), a social objective (to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes are provided to meet the needs of present and future generations, fostering a well-designed and safe built environment with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being) and an environmental objective (to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy).</p> <p>Plans are encouraged to positively seek opportunities to meet the development needs of the area and be sufficiently flexible to adapt to rapid change.</p>	<p>The CSNDP contains a raft of area specific policies which:</p> <ul style="list-style-type: none"> • Help to build a strong, responsive and competitive economy by seeking to retain and re-provide floorspace for the existing light industrial businesses present in the area (Policy CS EM2), by providing opportunities to deliver a range of new and replacement employment floorspace (CS EM1), by requiring the provision of affordable employment floorspace and industrial rents (CS EM1) and through the promotion of innovative buildings, which are capable of supporting both light industrial and residential uses (CS DQ1); • Help support the delivery of strong, vibrant and healthy communities by promoting housing as part of mixed use development, including affordable housing, which meets a range of different needs (CS HO1, CS HO2 & CS HO3); • Help to foster the delivery of a well-designed, green and safe environment (CSDQ1, CS DQ2 & CS TR1); • Help to support community health, social and cultural well-being through the provision of new and enhancement of existing community facilities (CS CSN1), encouraging walking and cycling (CS TR1), protecting existing open spaces and encouraging the provision of new green spaces (CS GI1 & GI2); and • Encourage sustainable design and construction across all new development (CS DQ1).
<p>Chapter 5 Delivering a Sufficient Supply of Homes</p>	
<p>The NPPF expects plan policies to make sufficient provision for housing, especially affordable housing. Chapter 5 sets out the Government’s aspiration to significantly boost the supply of homes across the country, including as part of mixed use development.</p> <p>Paragraph 61 expects policies to plan for a range of different housing types, sizes and tenures in order to accommodate different groups including (but not limited to) those who require affordable housing, families, older people, students and people with disabilities.</p> <p>Paragraph 62 states “where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site.”</p> <p>Paragraph 64 requires plan policies and decision makers to request at least 10% of new homes delivered to be available for affordable home</p>	<p>The CSNDP views housing as a key land use within the Neighbourhood Area and strongly promotes self-contained residential land uses alongside employment uses as part of mixed use development in order to create mixed and sustainable neighbourhoods. The Housing policies contained within the Plan seek to:</p> <ul style="list-style-type: none"> • Promote the redevelopment of existing under-utilised land and buildings for new housing (CS HO2). • Secure the highest maximum provision of on-site, truly affordable housing in line with identified local need (CS HO1). In order to ensure that new housing is affordable for everyone the Plan has a stated preference for social rented/London affordable rented housing and sets a desired affordable mix for 60% London Affordable rent (or similar) and 40% intermediate/London Living Rent (or similar). • Promote a mixed and vibrant community through the provision of a range of housing

ownership across all new major development proposals.	types, and sizes including family housing. (CS HO1)
Chapter 6 Building a strong and competitive economy	
<p>Chapter 6 (paragraph 80) requires planning policy to help create the conditions in which businesses can invest, expand and adapt. The paragraph goes on to state that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.</p> <p>Paragraph 81 goes further and expects policies to “set out a clear economic vision and strategy, which positively and proactively encourages sustainable growth.” Policies should also recognise and address the specific locational requirements of different sectors, seek to address potential barriers to investment and allow for new flexible working practices.</p>	<p>The CSNDP recognises the unique role of the area in terms of supporting a diverse mix of industrial uses and seeks to:</p> <ul style="list-style-type: none"> • Retain and integrate the existing mix of light industrial and warehousing businesses present in the area. (Policy CS EM2). • Encourage the provision of new and replacement employment floorspace to meet the needs of the existing B1c light industrial and B8 warehousing occupiers and other comparable occupiers (CS EM 1) • Encourage the provision of additional affordable workspace for SME and start-up businesses. (CS EM1). • Retain existing industrial rental levels and deliver a new affordable workspace (CS EM1). • Encourage the introduction of new innovative mixed-use buildings that are capable of integrating light industrial and residential land uses (CS DQ1). • Encourage home working opportunities (CS HO1).
Chapter 8: Promoting healthy and safe communities	
<p>Chapter 8 (Paragraph 91) requires planning policies to aim to achieve healthy, inclusive and safe places which:</p> <ol style="list-style-type: none"> a) Promote social interaction, b) Are safe and accessible, and c) Enable and support healthy lifestyles. <p>Paragraph 92 encourages the provision of social, recreational and cultural facilities and services that meet the needs of the community by planning positively for the provision and use of shared spaces, community facilities and other local facilities to enhance the sustainability of communities and residential environments; to guard against the loss of valued facilities and services and to ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.</p> <p>Paragraph 96 recognises that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.</p> <p>Paragraph 97 seeks to protect existing open spaces unless certain key criteria are met.</p>	<p>The CSNDP recognises that parts of the area are likely to experience significant change and that there is an opportunity to deliver substantial amounts of new housing and employment floorspace at an increased density.</p> <p>Alongside this, and within the context of the NPPF, the CSNDP wants to ensure that the existing residential and business communities are successfully integrated into any new development; that the impacts of any new development are understood and appropriately mitigated; that new open spaces and places are created and existing are protected and enhanced; that both new and existing facilities are delivered to meet the needs of both the existing and new communities and that careful consideration is given to movement and access into and through the area (particularly for pedestrians and cyclists).</p> <p>In pursuit of these objectives the plan advances a series of policies aimed at increasing opportunities for social activity and interaction through the protection of existing facilities and the provision of new (CS CSN1); promoting walking and cycling (CS TR2); reducing the impact of industrial traffic (CS TR1); enhancing connectivity and way-finding (CS DQ2); protecting and enhancing existing open space (CS G11) and providing new open space (CS G12).</p>

Chapter 9: Promoting sustainable transport	
<p>Chapter 9, Paragraph 102 confirms that Transport issues “should be considered from the earliest stages of plan-making so that:</p> <ol style="list-style-type: none"> a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.” 	<p>In pursuit of the objectives to secure sustainable transport patterns, the CSNDP:</p> <ul style="list-style-type: none"> • Encourages walking and cycling through enhancing existing routes, creating new routes (Figure 41), improving accessibility, overcoming barriers to movement and integrating the Plan Area into the wider network, introducing new lighting, new crossings, signage and street furniture (Policy CS TR2); • Seeks to manage and reduce the impact of industrial traffic, within the NP Area and particularly along Camley Street, in terms of the number of delivery vehicles, segregation of vehicular, pedestrian and cycle routes and reducing carbon emissions (Policy CS TR1); and • Encourages the provision of new Green Routes and links to existing green networks outside of the NP Area and greening the Regent’s Canal Tow Path (CS GI2).
Chapter 11 Making effective use of land	
<p>Chapter 11 expects policies to ensure an efficient and effective use of land in meeting housing and other needs, without compromising healthy and safe living environments. (Paragraph 117)</p> <p>Paragraph 118 goes onto state that policies should:</p> <ol style="list-style-type: none"> a) “Encourage multiple benefits from urban land through mixed use schemes and taking opportunities to achieve net environmental gains; b) Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production; c) Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; d) Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock up and railway infrastructure) and 	<p>The CSNDP recognises the opportunity and potential benefits that new development could bring to the Neighbourhood Area and promotes the intensification of underutilised sites it, where existing light industrial uses are retained.</p> <p>Policy CS HO2 specifically promotes the redevelopment of existing under-utilised land and buildings through higher density, mixed-use development, including housing, in order to secure a sustainable future for the Neighbourhood Area.</p>

<p>e) Support opportunities to use the airspace above existing residential and commercial premises for new homes.”</p>	
<p>Chapter 12 Achieving well-designed places</p>	
<p>Chapter 12 states, “Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”, (Paragraph 124) and requires:</p> <ul style="list-style-type: none"> i. That neighbourhood plans develop robust and comprehensive policies that set out the quality of development that will be expected for the area (paragraph 125); ii. That developments establish a strong sense of place, respond to local character and history and promote or reinforce local distinctiveness create safe and accessible environments where crime and disorder, are visually attractive as a result of good architecture and appropriate landscaping (paragraph 127); iii. That local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (paragraphs 130-31). 	<p>The CSNDP encourages ambitious, sustainable design throughout the Neighbourhood Area, in particular through design quality policies which seek to:</p> <ul style="list-style-type: none"> • Encourage safe and accessible development that connects well to the existing form and layout of the NP Area (CS DQ2); • Encourage new development to create new clear and legible routes connected to key nodes within the area (CS DQ2); • Encourage new tall building proposals that are of outstanding architecture, relate to the local context, retain existing views, protect heritage assets and promote legibility (CS DQ3) in order to accommodate higher densities and add variety to the skyline and streetscene; • Promote good design as a key aspect of sustainable development in order to create distinctive places (CS DQ1); and • Protect and enhance local heritage assets, strategic and local views (CS DQ1).
<p>Chapter 14 Meeting the challenge of climate change, flooding and coastal change</p>	
<p>Chapter 14 (Paragraph 148) states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change... and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.</p> <p>New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. (Paragraph 150)</p> <p>Paragraph 155 states that: “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.”</p>	<p>The promotion of sustainable development underpins each policy within the CSNDP. Specific policies relating to sustainability and reducing the impact of climate change include:</p> <ul style="list-style-type: none"> • Policy CS GI3 ensures the future resilience of the NP Area to climate change impacts by promoting biodiversity; • The Design Quality policies expect new development to integrate sustainable design measures early on in the design process and adhere to (and preferably exceed) national and local sustainable design standards; • Policy CS TR2 promotes walking and cycling as safe and healthy alternatives to the car by looking at ways routes can be improved throughout the NP Area; • Policy CS TR1 looks at opportunities to adapt existing industrial transport infrastructure in order to meet the operational needs of existing and future businesses, whilst encouraging sustainable transport practices and strategies; and • Policy CS TR1 also seeks to minimise pollution and conflicts between users through segregating industrial traffic from pedestrian and cycle routes where possible and encouraging modal shifts towards more sustainable transport uses including electric vehicles.

Chapter 15 Conserving and enhancing the natural environment	
<p>Chapter 15 (Paragraph 170) expects planning policies to contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> a) protecting and enhancing valued landscapes, soils and the best agricultural land; b) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; c) re-using and remediating previously developed (brownfield) land, where appropriate; d) minimising pollution of all kinds and looking to improve local environmental conditions. 	<p>The CSNDP places great importance on the provision of, and access to, green and open spaces throughout the NP Area.</p> <p>The evidence base and 2019 desk based assessment demonstrate that the local area is currently deficient in green and open spaces. Therefore, Policy CS GI1 protects all existing open space of townscape, amenity or ecological value.</p> <p>Policy CS GI2 helps provide opportunities for new open space provision including the creation of a new pocket park and links to key green networks within and out of the Neighbourhood Area, that reflect current and future local need.</p> <p>Policy CS GI3 ensures the future resilience of the NP Area to climate change impacts by promoting biodiversity. The policy promotes access to biodiversity and encourages net gains in biodiversity across all developments within the NP Area in order to create vibrant and healthy communities.</p>
Chapter 16 Conserving and enhancing the historic environment	
<p>Chapter 16 envisages a “positive approach to the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. (Paragraph 185)</p>	<p>The CSNDP recognises the importance of protecting and enhancing existing positive features within the Neighbourhood Area as well as promoting new development.</p> <p>Figures 43 and 44 identify positive local features including designated and non-designated buildings, townscape features and views, which are protected under Policy CS DQ1.</p>

5.2 Contribution to the Achievement of Sustainable Development

5.2.1 The plan must contribute to sustainable development, as defined within Chapter 5 of the NPPF as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” Paragraph 8 asserts that in order to achieve sustainable development the planning system must pursue three overarching, interdependent objectives. These are described as: economic objectives – to help build a strong economy, social objectives – to support strong and healthy communities and environmental objectives – to protect and enhance the environment.

5.2.2 The tables below assess the impact of the CSNDP on the three sustainable development objectives set out within the NPPF.

Delivering Economic Sustainability	
NPPF definition	Contribute to building a strong, responsive and competitive economy, by ensuring sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

CSNDP Objective	<ul style="list-style-type: none"> To enhance the prospects for local employment through retaining current businesses and providing opportunities for existing and new businesses to grow and flourish.
Relevant CSNDP Policies	<p>CS EM1 – Employment Floorspace Provision</p> <p>CS EM2 – Retention of Existing Businesses</p> <p>CS TR1 – Managing Industrial Traffic</p>
Commentary	<p>The CSNDP contributes to economic sustainability by:</p> <ul style="list-style-type: none"> Ensuring that business and industrial floor space is maintained and possibly increased. Providing affordable work space managed by a specialist provider to support existing and new small businesses. Ensuring that existing businesses are protected and accommodated within the development plan. Retaining light-industrial land use by re-allocating net floor space to new business should the existing business no longer wish to trade within the NP area. Providing off-street loading bay space to avoid disruption to traffic Segregating industrial traffic from pedestrian and cycle routes to minimise conflicts

Delivering Social Sustainability	
NPPF definition	Support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.
CSNDP Objective	<ul style="list-style-type: none"> To provide social infrastructure to improve well-being and quality of life of residents To provide a range of housing types and sizes that are genuinely affordable to local people.
Relevant CSNDP Policies	<p>CS CSN1 – Social Infrastructure Provision</p> <p>CS HO1 – Affordable Housing Provision</p> <p>CS HO2 – Residential Provision within Mixed Use Development</p> <p>CS DQ2 – Connectivity, Accessibility and Legibility</p>
Commentary	<p>The CSNDP contributes to social sustainability by:</p> <ul style="list-style-type: none"> Inclusion of on-site community facilities which contribute to the collective well-being. Aiming to provide 100% affordable housing with, a minimum 60% London Affordable rent, 40% intermediate products.

	<ul style="list-style-type: none"> Ensuring new developments overcome barriers of movement.
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Delivering Environmental Sustainability	
NPPF definition	Contribute to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
CSNDP Objective	<ul style="list-style-type: none"> To improve the range and quality of green spaces, particularly in areas lacking access to high-quality spaces. To improve the quality of the local environment in terms of design, landscape improvements and pedestrian and cyclist comfort and accessibility. To utilise innovative and eco-friendly building design and technology, with green infrastructure integrated throughout.
Relevant CSNDP Policies	CS TR1 – Managing Industrial Traffic CS TR2 – Encouraging Walking and Cycling CS GI1 – Protection and Enhancement of Existing Open Spaces CS GI2 – New Open Space Provision CS GI3 – Promoting Biodiversity CS DQ1 – Responding to Places CS DQ2 – Connectivity, Accessibility and Legibility
Commentary	The CSNDP contributes to environmental sustainability by: <ul style="list-style-type: none"> Considering the use of rapid electric-vehicle charging points for freight vehicles. Encouraging walking and cycling through provision of a pedestrian way-finding systems. Resisting the loss of smaller amenity areas, trees and vegetation including Camley Street Natural Park and Elm Village Open Space. Encouraging the enhancement of green corridors and existing residential gardens. Creating a ‘pocket park’ with dedicated play provision within the area. Protecting all trees, providing sustainable living walls and implementing biodiversity enhancements. Conforming to local plan standards with regard to energy efficiency, air quality management and climate change mitigation. Enhancing pedestrian legibility and comfort through provision of signage, street furniture and lighting.

5.2.3 In short, the Plan contributes to the achievement of sustainable development by:

- Enhancing the prospects for local employment through retaining current businesses and providing opportunities for existing and new businesses to grow and flourish.
- Providing and enhancing community assets that both enhance the quality of life in the area and reduce the need to travel to obtain these services elsewhere.
- Planning positively for housing growth to ensure a range of housing types and styles that are genuinely affordable.
- Improving the range and quality of the local environment in terms of design, landscape improvements and pedestrian and cyclist comfort and accessibility, particularly in areas lacking access to high-quality spaces.

5.3 Conformity with Strategic Policies contained in the Development Plan

5.3.1 The Plan Area is located within the London Borough of Camden. The Camden Development Plan comprises the following documents:

- The London Plan 2016 (January 2017 fix)
- LB Camden Local Plan (2017)

5.3.2 The Mayor of London published the Draft New London Plan in December 2017. The Draft New London Plan was published by the Mayor for consultation in December 2017. The consultation period ended on 2nd March 2018 and the Draft New London Plan is expected to go to public examination early next year. As the Draft Plan moves through the adoption process it holds more weight as a material consideration in planning decisions. Therefore, reference has also been made to relevant policies included within the Draft New London Plan.

5.3.3 The table below demonstrates how the Camley Street Neighbourhood Plan policies are in conformity with the strategic aims of the currently adopted London Plan and the New Draft London Plan.

London Plan Chapter/Policy Objectives (Adopted)	Camley Street Neighbourhood Development Plan Response
Chapter 1 Context and Strategy	
<p>Chapter 1 provides an oversight of the major issues facing London, which include:</p> <ul style="list-style-type: none"> - a growing and evolving population; - growing and changing economy; - poverty and deprivation in particular, the links between deprivation and housing; and - climate change and associated impacts <p>Given these challenges, the Plan sets out a wholesale strategic approach to planning for growth to 2036.</p> <p>The Mayor’s vision for the capital states: “London should excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in</p>	<p>The policies within the NP support the six London Plan objectives as follows:</p> <ol style="list-style-type: none"> 1. Retain existing employment opportunities within the NP Area (CS EM2) and provide new and replacement employment floorspace as part of mixed-use development (CS EM1) alongside new, high quality affordable housing provision that meets a wide range of housing needs (CS HO1 & HO2); 2. Support the continued economic success of Central London and the Central Activities Zone (CAZ) through the retention of existing light industrial and warehousing uses that contribute towards the strategic functioning of the CAZ (CS EM2);

<p>its approach to tackling the urban challenges of the 21st century, particularly that of climate change.”</p> <p>The vision is supported by six objectives set out in Policy 1.1. Boroughs, plans and decision makers should aim to realise the objectives ensuring London is:</p> <ol style="list-style-type: none"> 1. A city that meets the challenges of economic and population growth; 2. An internationally competitive and successful city; 3. A city of diverse, strong, secure and accessible neighbourhoods; 4. A city that delights the senses; 5. A city that becomes a world leader in improving the environment; 6. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities. 	<ol style="list-style-type: none"> 3. Deliver strong and secure neighbourhoods through the delivery of wide range of housing types and tenures as part of mixed use development (CS HO2) as well as the provision of new and enhanced community facilities (CS CSN1); 4. Deliver vibrant and healthy communities through mixed-use redevelopment, (CS HO2) and the provision of new green spaces that encourage biodiversity and food growing opportunities (CS GI3); 5. Encourage sustainable design and construction practices across all new development (CS DQ1 & CS DQ3), promote sustainable transportation throughout the NP Area, including for movement of freight and materials (CS TR1 & TR2) and securing biodiversity net gains within all new development proposals (CS GI3); and 6. Foster a well-designed, legible and safe environment (CS DQ1 & DQ2) and ensure access to high quality, affordable housing (CS HO1), employment opportunities (CS EM1) and opportunities for social interaction and activity (CS CSN1) for all.
<p>Chapter 2 London’s Places</p>	
<p>Chapter 2 sets out policies to support the delivery of the Mayor’s vision and six objectives in relation to specific areas across London. Policy 2.9 (Inner London) provides specific guidance on promoting growth across local areas and communities within Inner London.</p> <p>Policy 2.9 expects Boroughs to work to, “realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth.”</p> <p>Policy 2.18 (Green Infrastructure: the Multi-Functional Network of Green and Open Spaces) sets a strategic priority to promote, protect, expand and manage the extent of, quality of and access to London’s network of green infrastructure and encourage green links, including the Blue Ribbon Network.</p>	<p>The CSNDP, as a whole, aims to promote sustainable development in order to create inclusive and balanced communities. It is widely recognised that the provision of social infrastructure, including green and open space is crucial to this aim. As such, policy CS CSN1 ensures the retention of existing facilities that support social interaction and seeks opportunities to provide new facilities in line with locally assessed need.</p> <p>Policies CS GI1 and GI2 promote the protection and enhancement of existing green/open spaces, trees and vegetation and seek opportunities to provide new open spaces throughout the NP Area, including opportunities to provide links to key green routes into and out of the Area.</p> <p>Policies CS GI2 and CS TR2 aspire to improve existing connections and provide new connections to the Regents Canal, in particular, ensuring step free access where possible. CS GI2 also promotes the ‘greening’ of the canal towpath.</p>
<p>Chapter 3 London’s People</p>	
<p>Chapter 3 sets out policies that support the delivery of objectives 1, 3 and 4 ensuring that communities</p>	<p>The policies within the CSNDP promote the delivery of mixed-use development, including</p>

<p>and residents have the homes, opportunities, facilities and social infrastructure they need to 2036.</p> <p>Policy 3.3 (Increasing Housing Supply) sets an annual average target of 42,000 net additional homes across London. Policies 3.6 – 3.11 provide guidance for residential development proposals including setting a requirement for affordable housing provision. Policy 3.11 sets an annual target of at least 17,000 new affordable homes to be delivered up to 2036, with a priority for the delivery of affordable family sized homes. The policy also sets a desired tenure split: 60% for social /affordable rent and 40% for intermediate rent/sale.</p> <p>Policy 3.16 (Protection and Enhancement of Social Infrastructure) addresses the requirement for new and enhanced social infrastructure provision to meet the needs of its growing and diverse population.</p>	<p>new affordable housing, social and leisure facilities that will complement and integrate with existing residential and employment land uses.</p> <p>Policy CS CSN1 expects all proposals to contribute towards meeting local needs in terms of social infrastructure provision. Existing facilities will be protected and developer contributions will be secured to enhance existing and provide new facilities.</p> <p>Core Objective 3 anticipates the delivery of a significant number of new homes to suit a variety of people to meet housing need. Informed by Core Objective 3 and the associated sub-objectives, the ‘HO’ policies seek to:</p> <ul style="list-style-type: none"> • Maximise affordable housing provision within the NP Area with a target for 100% affordable provision; • Maximise self-contained residential units by limiting purpose built student accommodation in line with locally assessed need; • Encourage co-location of residential uses alongside commercial/industrial uses.
<p>Chapter 4 London’s Economy</p>	
<p>Chapter 4 sets out policies in relation to objectives 1 and 2 in order to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London.</p> <p>Policy 4.1 (Developing London’s Economy) includes a number of priorities including supporting and promoting the distinctive and crucial contribution to London’s economic success made by Central London and ensuring its specialist economic clusters are supported.</p> <p>Policy 4.4 (Managing Industrial Land and Premises) Provides specific guidance on the approach Boroughs should take to ensuring a sufficient stock of industrial land and premises, including non-designated sites. Development Plans should take account the need for strategic and local provision for waste management, transport facilities, logistics and wholesale markets within London and the wider city region and to accommodate demand for workspace for SME’s and for new and emerging industrial sectors including the need to identify sufficient capacity for renewable energy generation.” (part d)</p> <p>Policy 4.12 (Improving Opportunities for All) seeks to improve employment opportunities for Londoners, to remove barriers to employment and</p>	<p>A key aim of the CSNDP is to allow the existing employment uses (B1C and B8) within the NP Area to remain and build on the current economic success by encouraging the intensification of such uses.</p> <p>It is widely recognised that industrial land supply in Central London and the London Borough of Camden is failing to meet growing demand. In particular, premises are not suitable to meet the specific operational requirements for light industrial B1(c) and warehousing B8 uses. As such, policies CS EM1 and CS EM2 ensure that the NP Area will retain and continue to provide suitable premises for crucial B1(c) and also B8 uses in order to sustain economic growth within Central London, in line with Policy 4.1.</p> <p>The policy also aims to secure rents that are affordable for the existing businesses, secured at average Greater London Rental Levels.</p> <p>Proposals are expected to provide additional affordable workspace suitable for SME’s and start-ups where feasible as per policy 4.4, part D.</p>

<p>progression and to tackle low participation in the labour market.</p>	
<p>Chapter 5 London's Response to Climate Change</p>	
<p>Chapter 5 sets out the Mayor's aspiration to make London a world leader in tackling climate change in relation to objective 5. The policies within the chapter provide specific guidance in relation to a number of issues including; sustainable design and construction, renewable energy, innovative energy technologies, overheating and cooling and flood risk management.</p> <p>Policy 5.1 (Climate Change Mitigation) seeks to achieve an overall reduction in London's carbon dioxide emissions of 60% by 2025.</p> <p>Policy 5.10 (Urban Greening) promotes and supports urban greening to contribute towards adaptation to, and reduction of the effects of climate change.</p>	<p>All of the policies contained within the CSNDP seek to secure sustainable development.</p> <p>In particular:</p> <ul style="list-style-type: none"> • the 'GI' policies promote urban greening and biodiversity net gains to mitigate against the impacts of climate change. • the 'TR' policies promote sustainable modes of transport. • the 'DQ' policies promote sustainable design and construction methods and practices and expect development to adhere to and exceed sustainable design standards.
<p>Chapter 6 London's Transport</p>	
<p>Chapter 6 sets out policies to deliver objective 6, recognising that transport plays a fundamental role in addressing spatial planning priorities. (Chapter 6 should also be read alongside the Mayor's Transport Strategy.)</p> <p>Policy 6.1 (Strategic Approach) outlines the Mayor's strategic aspirations for transport infrastructure over the Plan period and also sets out his expectations in relation to reducing the need to travel by car. Policies 6.9 (cycling) and 6.10 (walking) promoting travel by cycling and/or walking and policy 6.13 sets maximum car parking standards in order to prevent excessive car parking provision.</p> <p>In relation to freight and commercial transport, policy 6.14 (Freight) seeks to improve freight distribution across London and promotes movement of freight by rail and waterway.</p>	<p>The CSNDP contains sustainable transportation policies that seek to set a transport strategy for the NP Area. Promoting sustainable modes of transport including delivery and freight movement is a key aspiration.</p> <p>CSNDP Policy CS TR1 recognises the challenges that intensification brings in relation to transport movement and looks to mitigate adverse impacts and promote sustainable transport where possible.</p> <p>CSNDP Policy CS TR2 looks to maximise opportunities to promote walking and cycling throughout the NP Area through enhancements to the pedestrian and cycle network and reducing the need to travel by car. Such enhancements include: improved signage and wayfinding, improvements to existing footways, provision of street furniture and provision of secure cycle parking facilities.</p> <p>There is also a desire to improve connections to the Regents Canal, in particular removing existing barriers to mobility and providing step free access.</p>
<p>Chapter 7 London's Living Spaces and Places</p>	
<p>Chapter 7 sets out policies in relation to objectives 3 and 4. The chapter focuses on a broad range of policy areas that impact directly on how people perceive and use the places the live in, work in and visit including architecture and design, heritage protection and promotion of biodiversity.</p> <p>Policy 7.1 (Lifetime Neighbourhoods) sets out 'lifetime neighbourhoods' principles that policies and proposals are expected to adhere to ensuring that people:</p>	<p>The CSNDP vision is to promote and secure a sustainable neighbourhood that benefits everyone. This includes:</p> <ul style="list-style-type: none"> • Promoting sustainable design (CS DQ1); • Promoting urban greening and the creation of new green spaces and links (CS GI2); • Promoting net gains in biodiversity (CS GI3);

<ol style="list-style-type: none"> 1. Can get around – neighbourhoods which are well-connected and walkable; 2. As far as possible, can have a choice of homes, accessible infrastructure and services, places to spend time and to work, with a mix of accessible and adaptable uses; and 3. Belong to a cohesive community which fosters diversity, social interaction and social capital. <p>Policies 7.2 - 7.13 relate to the design and form of new development across London and provide guidance on a wide range of themes including (but not limited to): inclusive design, designing out crime, architecture, location and design of tall buildings, public realm, responding to heritage assets and strategic views and maintaining a safe and secure environment that is resilient against emergencies. Policies 7.14 and 7.15 relate to improving air quality and reducing noise, in particular managing the impact of noise through the spatial distribution of noise making and noise sensitive uses.</p> <p>Chapter 7 also provides guidance on London’s natural environment, including Policy 7.18, (Protecting Open Space and Addressing Deficiency) which supports the creation of new open space in to ensure satisfactory levels of local provision to address areas of deficiency. The protection of existing open spaces, trees and woodlands is also supported, as well as enhancement, creation, promotion and management of biodiversity. (policies 7.19-7.21).</p> <p>Policies 7.24 – 7.30 refer to the ‘Blue Ribbon Network’ – a strategically important series of linked water spaces and provide guidance on how the network should be managed and enhanced, including increasing the use of the network to transport freight. (Policy 7.26)</p>	<ul style="list-style-type: none"> • Promoting accessibility, legibility through various urban design measures (CS DQ1 & DQ2); and • Promoting a safe, accessible and convenient pedestrian environment (CS TR2).
Chapter 8 Implementation, Monitoring and Review	
<p>Chapter 8 sets out the Mayor’s strategy for implementing the Plan’s policies. Policy 8.3 (Community Infrastructure Levy) seeks to ensure the effective development and implementation of the CIL.</p>	<p>The CSNDP makes reference to developer contributions and the community infrastructure levy (CIL). In particular, it is envisaged that CIL funding will be used to contribute towards social and community infrastructure (CS CSN1) and green infrastructure (CS GI1 and GI2).</p>

London Plan Chapter/Policy Objectives (Draft)	Camley Street Neighbourhood Development Plan Response
Chapter 1 Planning London’s Future (Good Growth Policies)	
<p>The Draft New London Plan covers a range of strategic planning policies that provide an overall vision for how the capital is envisaged to grow over the Plan period. As such, the policy areas and policies within the Plan are underpinned by six ‘good growth’ policies, which seek to secure</p>	<p>The principle of ‘good growth’ is embedded within the proposed spatial strategy for the NP Area and outlined within the vision for Camley Street, which envisages the delivery of “exemplary workspaces for existing and new businesses, a ‘step change’ in the quality of life for residents by improving mobility, widening the</p>

<p>'sustainable growth that works for everyone.' The six policies are:</p> <ul style="list-style-type: none"> • Policy GG1 – Building Strong and Inclusive Communities; • Policy GG2 – Making the Best Use of Land; • Policy GG3 – Creating a Healthy City; • Policy GG4 – Delivering the Homes Londoners Need; • Policy GG5 – Growing a Good Economy; and • Policy GG6 – Increasing Efficiency and Resilience. 	<p>range of goods and services available nearby, integrating nature more widely into the built environment and providing housing suitable in type and attainable in cost.” (para 4.2)</p> <p>The vision is underpinned by six ‘core’ objectives that promote ‘good growth’. Key aspirations set out within the Core Objectives include:</p> <ul style="list-style-type: none"> • Retaining and enhancing the existing employment function in order to encourage economic growth; • Increase opportunities for social activity and interaction; • Maximising the delivery of affordable homes that offer a wide range of housing types to meet local need; • Promoting efficient use of land through mixed use development including housing; • Promoting sustainable transportation including walking and cycling and increasing the range and quality of green and open spaces to promote health and wellbeing and increase resilience to the impacts of climate change; and • Promoting high quality, sustainable design to increase efficiency.
<p>Chapter 2 Spatial Development Patterns</p>	
<p>Chapter 2 provides a strategic framework for areas of London that are envisaged to undergo significant development over the lifetime of the draft Plan. This includes, opportunity areas, housing zones and growth corridors and the Central Activities Zone (CAZ).</p>	<p>The CSNDP recognises that the location of the NP Area, within Central London and close to a number of opportunity areas including Kings Cross, means that the area is likely to experience significant future development pressure. As a result, the policies within the CSNDP seek to shape such development and harness the benefits for the local community.</p> <p>Policy CS EM2 also refers to the strategic role the existing businesses play within Central London and the CAZ and seeks to ensure that these businesses have the right to remain, within proposals for intensification, in order to maintain and promote economic growth within Central London.</p>
<p>Chapter 3 Design</p>	
<p>The Mayor places great emphasis on the importance of high quality design and expects design quality to be secured within all new developments. Chapter 3 comprises a number of policies that provide specific design guidance relating to London’s Form and Character (D1), designing the public realm (D7) and tall building proposals (D8).</p> <p>Policy D2 (Delivering Good Design) states that “Good design principles must be embedded from</p>	<p>The CSNDP places great importance on securing high design quality. Core Objective 4 and the associated sub-objective inform the design quality policies which seek to maximise the opportunity to improve legibility and accessibility across the NP Area, including the public realm and pedestrian and cycle routes (CS DQ2). Proposals are also expected to explore new building typologies (CS DQ1) that will contribute towards delivering high-quality, integrated developments that complement and</p>

<p>the outset of the design process and carried through to completion of a development.”</p>	<p>enhance the existing local character and context.</p>
<p>Chapter 4 Housing</p>	
<p>Chapter 4 sets the Mayor’s aspirations for housing provision across the capital over the Draft Plan period allowing scope to allocate land and optimising sites to maximise housing.</p> <p>Policy H1 (increasing housing supply) sets ten-year targets for new housing completions which each local planning authority should plan for. The London Borough of Camden has a ten year housing target for 10,860 net new dwellings, which equates to 1,086 new homes annually. Policy H5 (Delivering Affordable Housing) sets a strategic target for 50% of all new homes delivered across London to be genuinely affordable and links to Policy H6 (Threshold approach to application), which sets a threshold level of affordable housing on gross residential development at:</p> <ul style="list-style-type: none"> • “a minimum of 35% or • 50% for public sector land, or • 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses, where the scheme would result in a net loss of industrial capacity.” <p>Policy H7 (Affordable Housing Tenure) expects the following split of affordable products should be applied to residential development:</p> <ol style="list-style-type: none"> 1) “a minimum of 30% low cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes, 2) a minimum of 30% intermediate products, 3) the remaining 40% to be determined by the borough as low cost rented homes or intermediate products.” <p>Policy H17 (Purpose-Built Student Accommodation) expects accommodation to contribute to a mixed and inclusive neighbourhood. There is also a requirement for affordable student accommodation as defined within the Draft Plan and Housing SPG.</p>	<p>Policy CS HO1 looks to maximise the delivery of affordable housing within the NP Area. CS HO1 sets an aspiration for 100% of all new homes delivered within the NP Area to be genuinely affordable, with a minimum expectation for 50% provision on publicly owned land and 35% on all other land. CS HO1 also sets a desired affordable split (in line with H7) for 60% London Affordable Rent (or similar) and 40% intermediate, in order to ensure that every member of the community is able to access the housing market.</p> <p>A principle aim of the CSNDP is to promote mixed and balanced communities. Evidence demonstrates that there is an overprovision of student accommodation within the NP Area and as such, Policy CS HO3 seeks to limit the proportion of non-self contained housing including student accommodation and expects any future proposals for student accommodation to contribute towards a mixed and inclusive neighbourhood, including the provision of affordable student housing.</p>
<p>Chapter 5 Social Infrastructure</p>	
<p>Chapter 5 recognises the important role social infrastructure provision plays in developing strong and inclusive communities and includes policies on how to positively plan for such facilities.</p> <p>Policy S1 (Developing London’s Social Infrastructure) expects social infrastructure to cover a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. Green infrastructure is noted as a key component of social infrastructure provision.</p>	<p>The consultation undertaken for the CSNDP identified a need to increase opportunities for social activity and interaction within the NP Area. Policy CSN1 protects existing community assets and sets a strategy for the provision of new social infrastructure that meets an identified need. New facilities and infrastructure are envisaged to be provided through developer contributions/CIL funding.</p>

Chapter 6 Economy	
<p>Chapter 6 includes planning policies that seek to protect and deliver employment opportunities across the capital and increase economic growth and diversity.</p> <p>Policy E3 (Affordable Workspace) looks to secure affordable workspace, particularly in areas where “cost pressures could lead to the loss of affordable of low-cost workspace.” The draft Plan defines affordable workspace as rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose.</p> <p>The draft Plan also responds to industrial capacity issues and recognises the important contribution that such industrial and warehousing uses make to the functioning of the city’s economy and, crucially, servicing the needs of the city’s population.</p> <p>Policies E4-E7 cover planning for designated and non-designated industrial land and support the functions of these sites to meet current and future demands. Policy E4 (Land for Industry, Logistics and Services to Support London’s Economic Function) expects a, “sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained.” LB Camden is expected to ‘retain capacity’, within table 6.2, demonstrating strategic demand for industrial floorspace within the Borough. Boroughs within the ‘retain’ category must ensure, as a general principle, no net loss of industrial floorspace, and are required to intensify industrial floorspace capacity where feasible.</p> <p>Policy E7 (Industrial Intensification, Co-location and Substitution) supports the intensification of industrial land to provide additional capacity and/or co-locate with other uses such as social infrastructure and/or residential.</p>	<p>The CSNDP recognises the significant contribution the NP Area provides to food production and storage across London and within the Central Activities Zone and the London Borough of Camden. As such, there is a strong desire within the local community to retain the current balance of industrial activity and where possible intensify existing uses, coupled with spaces that support collaborative working practices and small-scale manufacturing. As such, Policy CS EM1 protects existing B1(c) and B8 uses and promotes the intensification of such uses within redevelopment proposals.</p> <p>CS EM2 re-states this aspiration and seeks to protect and retain existing business uses that offer local employment opportunities and/or support the functioning of the CAZ, particularly in food supply and distribution. In support of policy E3, Policy CS EM2 expects this offer to be made to those businesses at average greater London light-industrial rental levels.</p> <p>Draft Policy E7 encourages the intensification of non-designated industrial sites, such as Camley Street, including co-location with residential and other uses. Policy CS HO2 seeks to maximise self-contained housing supply through co-location with commercial/industrial uses in line with London Plan guidance.</p>
Chapter 7 Heritage and Culture	
<p>Chapter 7 provides planning guidance in relation to London’s historic environment including designated and non-designated assets and strategic views.</p> <p>Policy HC1 (Heritage Conservation and Growth) requires the identification, protection and sensitive management of the city’s heritage assets and expects positive engagement with relevant stakeholders at the start of the design process to ensure the “capital’s heritage contributes positively to its future.”</p>	<p>Existing local heritage assets and positive features are identified and protected under Policy CS DQ1. Proposals are expected to enhance such assets and features including their setting.</p> <p>Policy DQ3 provides guidance for proposals for tall(er) buildings within the NP Area, including the need to preserve and enhance heritage assets, in particular strategic and local views into, through and out of the NP Area.</p> <p>Figure 47 illustrates the relevant London Plan designated views (3A.1 London Panorama: Kenwood The Gazebo & 2A.1 London Panorama Parliament Hill: The Summit) that fall within the Neighbourhood Area.</p>
Chapter 8 Green Infrastructure and Natural Environment	

<p>Chapter 8 provides guidance on how to protect, manage and plan for green infrastructure across London. The positive impact access to open space has on mental and physical health and well-being, adapting to the impacts of climate change, improving air quality, encouraging walking and cycling, learning and conserving the natural environment alongside traditional play, sport and recreational activities is widely recognised.</p> <p>As such, the policies contained within Chapter 8 encourage the protection, enhancement and management of London’s network of green and open spaces and natural environment. In particular, Draft Policy G4 (Open Space) expects new proposals to “resist the loss of protected open space in areas of deficiency.”</p>	<p>LB Camden’s Open Space Study found that the ward in which the NP Area is located currently has a deficiency in open space. As such, policy CS GI1 seeks to protect all existing open spaces within the NP Area and will secure financial contributions from new development to assist with the greening of the NP Area. Policy CS GI2 expects new proposals to provide for new green and open space (including play space) and to contribute towards the green infrastructure network.</p> <p>CSNDP Policies CS GI1 and CS GI2 will help assist in meeting draft policy G5 urban greening targets.</p>
<p>Chapter 9 Sustainable Infrastructure</p>	
<p>Adapting to climate change and promoting sustainable practices is a key consideration for all urban areas. Chapter 9 comprises a range of policies relating to various aspects of environmental sustainability, including improving air quality (Policy SI1), minimising greenhouse gas emissions (Policy SI2), energy infrastructure (Policy SI3) and managing heat risk (SI4). The GLA’s Sustainable Design and Construction SPG contains a checklist of measures which should be considered in the design of new development.</p>	<p>Promoting sustainable development is a key aim within the CSNDP and will be achieved through:</p> <ul style="list-style-type: none"> • Maximising sustainable modes of transport (CS TR2); • Promoting sustainable freight and delivery movement (CS TR1); • Expecting all new development to meet and exceed (where possible) London and local sustainable design requirements and promoting sustainable design measures that minimize resource consumption (CS DQ1 & DQ3); • Promoting urban greening throughout the NP Area (CS GI1 & GI2); and • Promoting biodiversity net gains (CS GI3).
<p>Chapter 10 Transport</p>	
<p>Chapter 10 sets out the Mayor’s aspirations in relation to promoting sustainable transport. The key priority across the policies within Chapter is encouraging movement by alternative modes of transport, in particular encouraging the use of public transport, walking and cycling and reducing the use of the private car (including promoting car-free development within Central London).</p> <p>Policy T1 (Strategic Approach to Transport) expects all new development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.</p> <p>Policy T7 (Deliveries, Servicing and Construction) seeks to “facilitate sustainable freight movement across London through consolidation, modal shift and promoting deliveries at different times of day and night in order to reduce the impact on road congestion and air quality and conflict with other uses.”</p>	<p>CSNDP Policy CS TR2 looks to maximise opportunities to promote walking and cycling throughout the NP Area. The approach conforms with the Mayor’s aspiration for, “80% of all trips in London to be made by foot, cycle or public transport by 2041.” (Draft Policy T1)</p> <p>Policy CS TR2 expects the provision of high quality, secure cycle parking in line with Draft Policy T5 (Cycling) and promotes wayfinding and accessibility through the provision of directional signage and public realm improvements.</p> <p>Policy CS TR1 complements draft Policy T7 and promotes sustainable delivery and freight movement, including opportunities to utilise the Regents Canal, reducing the impact of industrial traffic on the local road network. CS TR1 also expects redevelopment proposals for intensified employment uses to minimise conflicts with residential uses by segregating industrial traffic from pedestrian and cycle routes (where practicable).</p>

5.3.4 The table below demonstrates how the Camley Street Neighbourhood Development Plan policies are in conformity with the strategic aims of the Camden Local Plan. Whilst aspects of the Local Plan refer to site specific aspirations, it is acknowledged that the Local Plan is a strategic policy document for the whole Borough and as such the decision has been taken to assess the NP Policies against the whole document.

Camden Local Plan Chapter/Policy Objectives	Camley Street Neighbourhood Development Plan Response
Chapter 2 Growth and Spatial Strategy	
<p>Chapter 2 outlines the Council's ambitions for the delivery and location of growth across the Borough, with the most significant growth expected to be delivered within designated growth areas, other highly accessible locations and town centres and through the Council's Community Investment Programme (CIP) (Illustrated on Map 1: Key Diagram).</p> <p>Policy G1 (delivery and location of growth) sets the objectively assessed needs for Camden over the Plan Period for:</p> <ul style="list-style-type: none"> • 16,800 additional homes; • 695,000sqm of office floorspace; and • 30,000sqm of retail floorspace. 	<p>The CSNDP recognises that the NP Area is located within an area subject to considerable future growth. As such, the policies within the NP seek to shape and manage said growth and ensure that local residents and businesses benefit. In support of the objectives set out within Local Plan policy G1, the CSNDP promotes:</p> <ul style="list-style-type: none"> • The retention of existing and the creation of new employment opportunities (CS EM1 & EM2); • The provision of a wide range of housing types, including maximising affordable and family housing (CS HO1); and • Promoting mixed-use development, including social and community uses (CS HO2 & CS CSN1).
Chapter 3 Meeting Housing Needs	
<p>Chapter 3 includes policies that relate to the Borough's housing targets, including additional affordable homes and the type, size and mix of homes required within the Borough over the plan period.</p> <p>Policy H1 (Maximising Housing Supply) has a stated aim to exceed a target of 16,800 additional homes from 2016/17 – 2030/31, including 11,130 additional self-contained homes. Self-contained housing is regarded as a priority land use across the Borough, in particular affordable housing and is encouraged as part of mixed-use development, where appropriate (Policy H2). Policy H4 (Maximising the Supply of Affordable Housing) states a strategic target of 5,300 additional affordable homes from 2016/17 – 2030/31 and aims for an, "appropriate mix of affordable housing types to meet the needs of households unable to access market housing."</p> <p>The Council's target of 160 additional places annually in student housing is set out within Policy H9 (Student Housing), which states that student housing will only be supported where it will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year, and will not involve a site identified for self-contained</p>	<p>Camden Local Plan policy H4 directly informed Policy CS HO1 with regard to meeting the needs of existing and future household by maximising the supply of affordable housing, namely improved provision for families. The need to prevent people from middle-income households being pushed out of Camden will be addressed by striving to provide 100% affordable housing and 50% as a minimum on publicly owned. CS HO1 expects this affordable provision to provide 60% as social-affordable rented housing and 40% as intermediate housing.</p> <p>Building on Local Plan Policy H2, Policy CS HO2 aims to allocate at least 50% of all additional floor space as self-contained housing within mixed use development, in order to maximise housing delivery. Given this aspiration, Policy CS HO3 seeks to limit purpose-built student accommodation in order to create mixed and balanced communities. Where student housing is proposed, schemes should explore opportunities to link with workspaces and businesses.</p>

<p>housing. New student accommodation should be accessible and contribute towards a mixed, inclusive and sustainable community.</p>	
<p>Chapter 4 Community Health and Well-being</p>	
<p>The creation and promotion of healthy communities is a key planning consideration and Chapter 4 provides policies that require all developments to help to reduce health inequalities and create healthier communities.</p> <p>Policy C1 (Health and Wellbeing) states that the, “Council will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities.”</p> <p>Policy C2 (Community Facilities) expects new and existing community facilities to meet the changing needs of local communities and reflect new approaches to the delivery of services. The Council will ensure that existing facilities are retained and where appropriate, will seek developer contributions to secure new and improved facilities and services. Policy C3 (Cultural and Leisure Facilities) also ensures the retention of important local facilities (including public houses) and states that the Council will seek opportunities for new cultural and leisure facilities within major developments.</p>	<p>Local Plan Policy C1 informs the CSNDP through the creation of high quality, active, safe and accessible places.</p> <p>The intention of policy CSN1 is to create an area with a richer mix of land uses to meet the changing needs of the community. This aspiration is reinforced through the GI, TR and DQ policies, which promote accessibility and inclusiveness so that the NP Area can be accessed safely and easily by all.</p> <p>These policies also promote a green and better connected NP Area within the wider context including easier access to a range of services by a choice of means of transport.</p>
<p>Chapter 5 Economy and Jobs</p>	
<p>Chapter 5 outlines the Council’s ambitions to secure economic growth and promote a successful and inclusive economy in Camden.</p> <p>This will largely be achieved through the aims set out within Policy E1 (Economic Development) this includes: supporting businesses of all sizes and maintaining “a stock of premises that are suitable for a variety of business activities, for firms of differing sizes and available on a range of terms and conditions for firms with differing resources.”</p> <p>The Council will also support existing industries by:</p> <ol style="list-style-type: none"> i. “Safeguarding existing employment sites and premises in the Borough that meet the needs of industry and other employers, ii. Supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites.” <p>Policy E2 (Employment Premises and Sites) states that the Council will “protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden</p>	<p>The CSNDP’s principle aim is to retain the existing B1c and B8 uses as they are vital to the strategic functioning of the local area, wider Borough and the CAZ. Camden Local Plan Policy E1 specifically informs Policy CS EM1 with regard to supporting businesses of all sizes and safeguarding existing employment sites. CS EM1 also conforms to the LB Camden Local Plan regarding employment floorspace being maintained or increased as per Policy E2.</p> <p>As evidenced within the CSNDP, the uses on the site are vital for the local area, Borough and CAZ. Therefore, policy CS EM1 has been introduced in order to protect them from being unreasonably pushed out of the area due to inflation and rising rental prices as a result of higher land values for residential proposals. As acknowledged, the location in which Camley Street is situated, would be expected to have higher values than comparable light industrial locations within outer London. The policy seeks to encourage comparable businesses to locate and operate within the NP Area as a result of any new development proposal and/or existing businesses choosing to relocate, by ensuring that rents will not be so unaffordable they would have to locate elsewhere. The average Greater London benchmark areas chosen reflect this</p>

<p>residents and those that support the functioning of the CAZ or the local economy.”</p> <p>The redevelopment of employment sites or premises will be supported only where:</p> <ul style="list-style-type: none"> • “the level of employment floorspace is increased or at least maintained, • The redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry and warehouse/logistic uses that support the functioning of the CAZ or the local economy, • It is demonstrated to the Council’s satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden’s local economy and will be to a sustainable location, • The proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable, • The scheme would increase employment opportunities for local residents, including training and apprenticeships, • The scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site, and • For larger employment sites, any redevelopment is part of a comprehensive scheme.” 	<p>aspiration to provide affordable industrial floorspace for existing and new businesses</p> <p>Policy CS EM2 has been informed by Camden Local Plan Policy E1 regarding maintaining existing employment sites in addition to a stock of premises suitable for a variety of business activities, which serve to provide additional employment benefits.</p> <p>As evidenced, there is no suitable accommodation within reasonable proximity of the current site for the existing businesses. Therefore, ‘as far as possible’ (Local Plan policy E2) has been taken to mean aspiring for retention given the strategic role the existing businesses play in servicing the CAZ, Camden and Greater London.</p>
<p>Chapter 6 Protecting Amenity</p>	
<p>Chapter 6 contains policies that relate to maintaining and increasing standards of amenity across the Borough, including protecting the Borough’s parks and open spaces.</p> <p>Policy A2 (Open Space) states that the Council will protect and improve access to Camden’s parks, open spaces and other green infrastructure and secure new and enhanced open spaces, including play facilities within major residential developments.</p> <p>Policy A3 (Biodiversity) affords protection to trees and woodlands across the Borough and will seek to secure additional trees and vegetation as part of new development. Sites and features of nature conservation and biodiversity will also be protected and improvements to green corridors secured.</p> <p>Where housing is proposed as part of mixed-use development, the Council will seek to ensure that high standards of amenity are maintained and that internal and external noise and vibration levels are controlled and managed in order to mitigate any</p>	<p>CS Gl1 aims to protect and enhance open spaces specifically refusing development which would have a direct or indirect harmful impact on open space within CSNDP area. This heeds Policy A2 of the Camden Local Plan refusing development where it would be detrimental to the setting of designated open spaces. Policy A3 informs CS Gl1 with regard to securing improvements to green corridors and seeking opportunities to experience nature, especially where such opportunities are lacking.</p> <p>Policy CS Gl2 aims to create a ‘pocket park’, which seeks to improve opportunities to experience nature through its accessibility to residential areas, in alignment with Policy A3.</p> <p>Policy CS Gl3 is informed by Policy A3 and seeks to protect and seek to secure additional trees and vegetation.</p>

<p>conflicts between uses. (Policy A4 Noise and Vibration)</p>	
<p>Chapter 7 Design and Heritage</p>	
<p>The Council recognise that good design is essential to creating places, buildings and/or spaces that are accessible and adaptable to change.</p> <p>Policy D1 (Design) provides guidance to secure high quality design across all new development including: responding and respecting local character, preserving the historic environment, integrating sustainable design and construction measures and practices, promoting health and accessibility and minimizing crime and anti-social behaviour. Policy D1 also provides guidance for tall building proposals including design criteria for assessing the suitability of proposals.</p> <p>Policy D2 (Heritage) sets out the Council's approach to conserving heritage assets. It preserves and, where appropriate, enhances "Camden's rich and diverse heritage assets and their settings including Conservation Areas, Listed Buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets."</p>	<p>Policy CS DQ1 seeks to preserve and enhance the settings of heritage assets in accordance with Policy D1 and D2. Policy D1 aims to minimise crime and antisocial behaviour and provide a high standard of accommodation. This is reinforced in policy CS DQ1, where the NP seeks to ensure that the quality of the environment for existing residents is improved and enhanced.</p> <p>Policy D1 outlines that developments should integrate well with the surrounding streets and open spaces, specifically improving movement through the site which underpins Policy CS DQ2 in relation to overcoming barriers to movement and enhancing pedestrian legibility.</p> <p>Camden Local Plan Policy D1 informs Policy CS DQ3 in relation to proposals for tall buildings, specifically relating well to the existing streets in terms of how the base of the building fits the streetscape and how the top of a tall building affects the skyline, particularly in respect of existing views, vistas and sightlines.</p>
<p>Chapter 8 Sustainability and Climate Change</p>	
<p>Chapter 8 sets out the Council's aims to tackle the causes of climate change in the Borough. Camden's Environmental Sustainability Plan (2011-2020) Green Action for Change expects a 40% reduction in borough wide CO2 emissions by 2020.</p> <p>All new development will be required to minimise the effects and be resilient to climate change (Policy CC1 & CC2), reduce the flood risk (Policy CC3) and reduce exposure to poor air quality (Policy CC4) among other aspirations.</p> <p>Policy CC5 (Waste) states that Camden will be a low waste borough and will increase recycling and the re-use of materials in line with London Plan standards.</p>	<p>The promotion of sustainable development is the principal aim of the CSNDP and underpins each policy within the Plan. The CSNDP expects all new development to meet and preferably exceed Local Plan requirements in terms of sustainable design, energy consumption and carbon emissions (CS DQ1) and provides guidance on how to reduce the impacts of climate change including through urban greening, sustainable urban drainage (CS GI3) and promoting sustainable travel (CS TR2).</p>
<p>Chapter 10 Transport</p>	
<p>Chapter 10 deals with and sets out the Borough's transport strategy, ensuring that anticipated growth is supported by healthy and sustainable transportation, including minimizing the use of motor vehicles.</p> <p>Policy T1 (Prioritising walking, cycling and public transport) aims to, "promote walking in the borough and improve the pedestrian environment... ensure a safe and accessible environment for cyclists and promote the provision of public transport in the borough." In line with these objectives, Policy T2 (Parking and Car-free Development) seeks to limit the availability of parking and expects all new</p>	<p>CS TR1 seeks to maximise opportunities for residents and workers to walk and cycle as per Policy T1 of the Local Plan. Policy T4 promotes the provision and use of freight consolidation facilities, CS TR1 takes this into account by stipulating that space for off-street loading bays should be provided to avoid disruption to traffic.</p> <p>CS TR2 conforms to Camden Local Plan Policy T1 specifically with regard to improving the pedestrian environment, providing accessible and secure cycle parking facilities and providing for interchanging between different modes of transport. CS TR2 is also in conformity with Camden Local Plan Policy T3 regarding</p>

<p>developments within the Borough to be car-free (except for Blue Badge spaces).</p> <p>The Local Plan also recognizes the impact the movement of goods and materials can have on the environment. Policy T4 (Sustainable Movement of Goods and Materials) seeks to mitigate these impacts by minimising the movement of goods and materials by road, encouraging the, “movement of goods and materials by canal, rail and bicycle where possible” and promoting, “the provision and use of freight consolidation facilities.”</p>	<p>protecting existing and proposed transport infrastructure.</p>
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5.4 Compatibility with EU Obligations and Legislation

- 5.4.1 In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, an SEA screening was undertaken in support of the NDP (please see Appendix 1). It was confirmed by the London Borough of Camden, on the 15th November, that an SEA is not required for this Neighbourhood Development Plan. The screening was submitted to the relevant statutory environmental bodies (Historic England, Natural England and the Environment Agency).
- 5.4.2 There are no European designated nature sites within the NP Area that would necessitate a Habitat Regulation Assessment (HRA). A Borough wide HRA was undertaken for the Camden Local Plan and it has been agreed that this can be used to supported the CSNDP (please see Appendix 2).
- 5.4.3 The Camley Street Neighbourhood Development Plan has regard to the fundamental rights and freedoms safeguarded under the European Convention on Human Rights and complies with the Human Rights Act 1998. An Equalities Impact Assessment has been undertaken in support of the Plan by Camden Council (please see Appendix 3).

6 Summary

- 6.1 The Basic Conditions, as set out in Schedule 4B to the TCPA 1990, are considered to be met by the Camley Street Neighbourhood Development Plan. Therefore, it is respectfully suggested to the Examiner that the Camley Street Neighbourhood Development Plan complies with Paragraph 8(1)(a) of Schedule 4B of the Act.

Appendix 1

Strategic Environmental Assessment Screening Opinion

Strategic Environmental Assessment (SEA) Screening Opinion

**Draft Camley Street Neighbourhood Plan
'Pre-submission' version**

Prepared by:

London Borough of Camden

November 2018

Contents

- 1.0 Introduction
- 2.0 Vision, objectives and priorities of the Plan
- 3.0 Assessment
- 4.0 Screening outcome
- 5.0 Next steps

1. Introduction

- 1.1. A neighbourhood plan may require a Strategic Environmental Assessment (SEA) to comply with European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”. The European Directive is transposed into law by the Environmental Assessment of Plans and Programmes Regulations 2004. Under Article 3(3) and 3(4) of the SEA Directive, SEA is required for plans and programmes which “determine the use of small areas at a local level and minor modifications to plans and programmes” where they are determined to be likely to have significant environmental effects.
- 1.2. It is the Council’s responsibility to identify whether an SEA should be undertaken on a neighbourhood plan. This is determined through an SEA screening exercise (see table below).
- 1.3. There is no legal requirement for a neighbourhood plan to have a Sustainability Appraisal (SA), as set out in section 19 of the Planning and Compulsory Purchase Act.
- 1.4. The screening process is based upon consideration of standard criteria in Annex II of the Directive to determine whether the plan is likely to have “significant environmental effects”. The result of the Camden’s screening process is detailed in this screening statement.
- 1.5. A draft of the Camley Street Neighbourhood Development Plan was screened for SEA June 2017 and consulted on with the statutory bodies (Historic England, Natural England and the Environment Agency) for their views. The Council determined that the draft Camley Street Neighbourhood Plan was likely to have significant environmental effects. This related to the draft Plan’s proposal for a restrictive ‘cap’ in the draft Plan on student housing which would potentially act as a blanket ban on this land use for the whole plan period. The SEA raised concerns about the sustainability implications of this policy approach.
- 1.6. A new draft plan has been produced by the Camley Street Neighbourhood Forum dated July 2018 (and subsequently amended) and is subject of this new SEA screening assessment.
- 1.7. The Council has determined that the draft Camley Street Neighbourhood Plan July 2018 is unlikely to have significant environmental effects. The statutory consultation bodies (Historic England, Natural England and the Environment Agency) agree with this determination.

2. Vision, objectives and policy priorities of the plan

2.1. The stated vision of the draft Camley Street Neighbourhood Development Plan is:

“Adjoining the Regents Canal and located between Camden Town and King’s Cross, the Neighbourhood Plan area will transform into a mixed community providing: a range of industrial and commercial space; new dwellings; and new social and community infrastructure. New development over the plan period will satisfy the needs of the current business occupiers, create additional space for new businesses, safeguard existing jobs and creates new ones and provide new homes, with a minimum of 50% affordable housing, plus community facilities and services that will support the existing and new communities. Development will utilise innovative and eco-friendly building design and technology, with green infrastructure integrated throughout.”

2.2. The draft Neighbourhood Plan’s key policy areas are:

- Employment
- Local Community and Social Needs
- Housing
- Sustainable Transport
- Design Quality
- Green Infrastructure

3. Assessment

3.1. The ‘responsible authority’ (London Borough of Camden or another delegated body) must determine whether a plan or programme, in this case the draft Camley Street Neighbourhood Development Plan, is likely to have significant environmental effects with reference to the criteria specified in Schedule 1 of the Regulations.

3.2. These criteria are set out in the table below, along with consideration of the likely impact of the Neighbourhood Plan against each.

SEA Directive criteria	Comments	Likely Significant Effects?
Characteristics of plans and programmes, having regard, in particular to:		
1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard	<p>The Neighbourhood Plan must have regard to National Policy and be in general conformity with the strategic policies of the borough.</p> <p>The draft Neighbourhood Plan, if adopted, would form part of the statutory Development</p>	No

<p>to the location, nature, size and operating conditions or by allocating resources</p>	<p>Plan for the borough and as such contribute to the framework for future projects and activities in the Neighbourhood Area.</p> <p>The Plan does not allocate sites for development or address issues outside of those already assessed in the Council's Local Plan SA (incorporating SEA) and as such is not considered to have significant effects in this regard.</p>	
<p>1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy</p>	<p>The Neighbourhood Plan must be consistent with the National Planning Policy Framework and in general conformity with the Council's strategic policies.</p> <p>The Neighbourhood Plan may form the context for and influence other documents for this area. However, it is considered the extent of impact is unlikely to be significant in this regard.</p>	<p>No</p>
<p>1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development</p>	<p>The Neighbourhood Plan seeks to make a positive contribution to the three dimensions of sustainable development (social, economic and environmental). The Plan's policies have sought to achieve social, economic and environmental gains simultaneously. For example, the redevelopment of commercial sites provides an opportunity to provide more jobs as well as delivering new areas of open space.</p>	<p>No</p>
<p>1d) Environmental problems relevant to the plan or programme</p>	<p>The Neighbourhood Plan identifies the quality of local open spaces as being a particular issue that detracts from the local environment for people living and working in the area. Policies CS GI1 & CS GI2 seek contributions from developments that would lead to additional demand being placed on designated open spaces. The Neighbourhood Plan's emphasis on improving the public realm and connectivity of the area suggests that the Plan's policies will, on implementation, have beneficial effects. The Neighbourhood Plan has appropriately identified, and responded to, known environmental problems in the Plan area.</p>	<p>No</p>

1e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	The neighbourhood plan is not directly relevant to the implementation of community legislation on the environment.	No
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a) The probability, duration, frequency and reversibility of the effects	The policy approaches are not considered to extend significantly beyond the Council's policies which have already tested for SEA.	No
2b) The cumulative nature of the effects	<p>Cumulative effects occur where the outcome of one or more policies, when put together, have a significant combined effect.</p> <p>The draft Plan does not allocate sites for development nor do the policies extend significantly beyond those already tested for SEA in the Council's Development Plan for the borough.</p>	No
2c) The trans-boundary nature of the effects	There are no trans-boundary effects arising from the Neighbourhood Plan.	No
2d) The risks to human health or the environment (e.g. due to accidents)	There are unlikely to be risks to human health or the environment arising from the Plan.	No
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The Plan will apply to new development in the neighbourhood plan area (a part of St Pancras and Somers Town ward). Currently, the area contains a mix of largely light industrial and general industrial uses, as well as housing, focussed on Elm Village, including student accommodation.	No

	The Camley Street Neighbourhood Plan Evidence Base (December 2015) states that the 2011 Census recorded about 500 people working in the neighbourhood area (aged 16-74). The Census also recorded approx. 1,200 people living in the Camley Street area.	
2f) The value and vulnerability of the area likely to be affected due to: i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards or limit values iii) intensive land-use	Local Plan policies relating to design, cultural heritage and environmental protection will apply alongside the Neighbourhood Plan. The draft Neighbourhood Plan has been amended to include the Council's position on tall buildings. The extent of effects are not considered sufficient to warrant SEA.	No
2g) The effects on areas or landscapes which have a recognised national, Community or international protection status	There are no landscapes of national or international protection status in the Plan area.	No

4. Screening outcome

4.1 The screening assessment has identified that the draft Plan is unlikely to give rise to significant environmental effects. The draft neighbourhood plan:

- does not propose sites for development; and
- the policies are not considered to have significant effects that have not already been dealt with in the Council's Sustainability Appraisal (incorporating SEA).

4.2 This determination has also been subject to consultation with the statutory consultation bodies. The consultation bodies, specified in the Environmental Assessment of Plans and Programmes Regulations 2004 that have been consulted are:

- Natural England,
- Historic England,
- Environment Agency.

4.3 The responses from the consultation bodies were received in October - November 2018 and are set out below.

Natural England

On the basis of the material supplied at this time, Natural England concludes that there are unlikely to be significant environmental effects from the proposed plan.

Historic England

Historic England agrees with the Councils SEA screening assessment.

Further comments in respect of the draft Neighbourhood Plan have been provided. These have been shared with the neighbourhood forum.

Environment Agency

Based on the review of environmental constraints, for which the Environmental Agency is a consultee, they note there are no areas of fluvial flood risk, Source Protection Zones for groundwater or main watercourses affected by the neighbourhood plan area. The Environment Agency does not consider there to be any potential significant environmental effects relating to these constraints.

4.4 The result of this screening opinion will be shared with Camley Street Neighbourhood Forum.

Appendix 2

Habitats Regulation Assessment Screening Opinion

Habitats Regulations Assessment (HRA) Screening Opinion

**Draft Camley Street Neighbourhood Plan
'Pre-submission' version (November 2018)**

Prepared by:

London Borough of Camden

Habitats Regulations Assessment: Screening Opinion

- 1.1. The European Directive 92/43/EEC on Conservation of Natural Habitats and Wild Flora and Fauna Habitats provides legal protection for habitats and species of European importance (the Habitats Directive). The Directive's principal aim is to maintain at, and where necessary restore to, favourable conservation status of important, rare or vulnerable flora, fauna and habitats. The Directive is transposed into English legislation through the Conservation and Species Regulations 2010 (as amended).
- 1.2. It is a requirement of Article 102 of the Regulations that "the plan making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives", where a plan is likely to have a significant effect on a European site and where it is not directly connected with or necessary to the management of the site.
- 1.3. The Habitats Directive also established a European network of nature conservation sites known as the 'Natura 2000' network. These sites consist of Special Areas of Conservation (SACs) – which protect habitats, Special Protection Areas (SPAs) – which protect birds and Offshore Marine Sites (OMSs) as well as RAMSAR sites which give protection to wetlands. The Council has identified four Natura 2000 sites within proximity to the Borough of Camden: three Special Areas of Conservation, i.e. Epping Forest, Richmond Park and Wimbledon Common, and one Special Protection Area and RAMSAR site: the Lee Valley.
- 1.4. The Camley Street Neighbourhood Forum has prepared a draft Neighbourhood Plan ('the pre-submission plan'). There is a statutory requirement for Camden Council to assess the likelihood of the Draft Plan's policies or proposals having an adverse impact on the Natura 2000 sites. There is also a separate requirement under the Localism Act for all neighbourhood plans to meet a number of 'Basic Conditions' which are tested through the independent examination. One of the Basic Conditions reflects the need to undertake an Habitats Regulations Assessment (HRA) screening, i.e. the making of a neighbourhood plan must not breach, and be otherwise compatible with, EU obligations, such as the Strategic Environmental Assessment (SEA) and Habitats Directives. This Screening Opinion will need to be provided to the Neighbourhood Plan Independent Examiner to assist their assessment of whether the Draft Plan meets the Basic Conditions. The Council has separately undertaken an SEA Screening report which has been shared with the relevant statutory bodies and Camley Street Neighbourhood Forum.

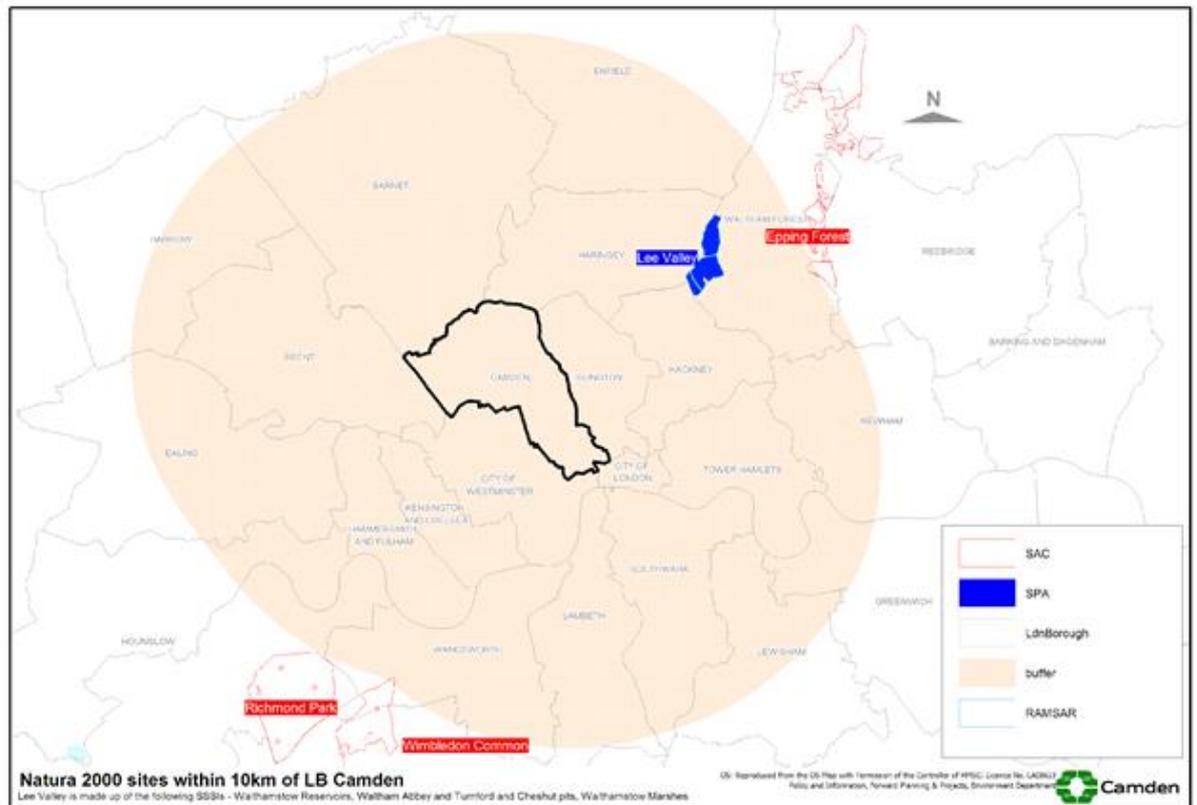
- 1.5. A Habitats Regulations Assessment is a formal assessment of whether a plan or project is likely to have a significant or an adverse impact on the integrity of Natura 2000 sites. The HRA Screening must determine whether significant effects on a Natura site can be ruled out on the basis of objective information. Once the Screening is complete, the Council is required to consult Natural England on its findings.

The Draft Camley Street Neighbourhood Plan

- 1.6. A draft of the Camley Street Neighbourhood Plan was shared with Camden Council in July 2018. Further refinement of the Plan's policies was undertaken during the second half of 2018 prior to a formal consultation on the draft 'Pre-submission version' Plan commencing. This consultation is being led by the Camley Street Neighbourhood Forum in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and runs from 28 November 2018 to 13 January 2019.
- 1.7. The Neighbourhood Plan covers a small area within St Pancras and Somers Town ward. As described in the Draft Neighbourhood Plan (paragraph 2.8) it is a "unique and distinct area of Camden and London. Virtually isolated by strategic transport links provided by the Regent's Canal and railway lines, yet within walking distance of central London, it provides home for a small number of residents and a cluster of small businesses, many of which use the location to supply central London's economy". It forms a relatively small plan area towards the centre of the London Borough of Camden. There are no Natura sites in the Plan area or LB Camden itself.
- 1.8. As the Neighbourhood Plan must be in general conformity with the strategic policies of the development plan, in this case the adopted Camden Local Plan 2017, the Council considers that the Habitats Regulations Assessment Screening Opinion for the Borough is an important consideration in determining whether there is a need for additional detailed assessment at the neighbourhood planning level.
- 1.9. Camden Council's screening of the Draft Local Plan (2015) identified whether the Plan's policies would give rise to impacts on the Natura 2000 sites and if so, establish the need for further assessment. The Council's Screening identified 4 sites within 10km of the borough of Camden – Epping Forest, Lee Valley, Richmond Park and Wimbledon Common. A map of the relevant sites is set out below (Map 1) .
- 1.10. The Screening Opinion can be viewed on the Council's website. It concluded that:

“None of the proposed draft policies were found to have likely significant effects on the sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. It is considered that the policies contained in the draft Local Plan are unlikely to have significant effects on sites of European importance for habitats or species, or an adverse impact on the integrity of those sites”.

Map-1.-Natura-2000-sites



- 1.11. The Screening Opinion noted that the increased population anticipated for Camden could have indirect impacts on the Natura 2000 sites. These potential impacts are - increased recreational demand; increased demand for clean water; and decreases in air quality. With regards to potential increased pressure on the sites from additional recreational demand, the Lee Valley is the closest of the four sites to LB Camden. The Screening Opinion considered that the Draft Camden Local Plan aims to strongly protect the Borough’s existing open spaces, reducing the need for residents to use spaces outside of the borough. In addition, Policy A5 of the draft Plan (Policy A2 in the final adopted version of the Plan) requires new and improved open space provision to meet the needs of new development within the Borough, further helping to offset potential use of open spaces further away, including Natura 2000 sites. The Plan was not therefore considered likely to give rise to a significant or adverse impact any of the Natura 2000 sites in relation to increased recreational demand.

- 1.12. On the potential for an increased demand for water, the Screening Opinion considered that Camden's growth might place pressure on reservoirs within the European sites, specifically the Lee Valley. However, the likelihood of any significant impacts was mitigated by Local Plan Policy CC3. This includes a range of measures to ensure that development does not increase flood risk and reduces the risk of flooding where possible. The Local Plan seeks the efficient use of water in new and refurbished developments and where possible, the re-use and recycling of water. The Plan seeks to protect existing drinking water and foul water infrastructure, including the reservoirs at Barrow Hill, Hampstead Heath, Highgate and Kidderpore. The Screening Opinion also notes that the provision of adequate water resources, e.g. through transfers from water surplus areas or the construction of new reservoirs, is planned across a catchment area (wider than a single Borough) and investment in new infrastructure is allocated accordingly. The Screening Opinion concludes that the Local Plan is unlikely to have a significant impact on the Natura 2000 sites due to increased water consumption.
- 1.13. The potential for increased levels of atmospheric pollution from emissions is linked to the emissions created by the construction and occupation of development and associated vehicle movements. To address this, the Local Plan has strong policies to limit vehicular traffic, promote sustainable travel modes, support sustainable goods and materials or manage traffic from demolition and construction sites and therefore limit air pollution. The Council also requires certain developments to undertake Air Quality Assessments (AQA) and will not grant planning permission unless mitigation measures are adopted where an AQA shows there will be harm to air quality. The Screening Opinion considers that with these policies in place, the Local Plan is unlikely to have a significant impact on the Natura 2000 sites due to increased levels of atmospheric pollution.
- 1.14. The Council has carefully considered how the Draft Camley Street Neighbourhood Plan's policies relate to those set out in the adopted Camden Local Plan. In particular, the Council considers that the Draft Plan is consistent with the Local Plan's Growth and Spatial Strategy set out by Policy G1. This policy identifies emerging priorities for the Camley Street area, which the Camley Street Neighbourhood Plan has developed in greater detail. The Neighbourhood Plan does not itself identify quantum for development on sites identified in the Plan area.
- 1.15. The Council considers that the Draft Neighbourhood Plan builds on and adds local detail that is likely to have some beneficial outcomes, including for the protection of the Natura 2000 sites. Where the Draft Plan sets out a locally-

specific approach to environmental quality, for example the suite of policies on Green Infrastructure, this supports the approach in the adopted Camden Local Plan, i.e. Policies A2 and A3. The Neighbourhood Plan does not undermine the protections for the Natura 2000 built into the Local Plan. In line with the methodology followed in the Draft Local Plan HRA Screening, the Council has assessed each of the Draft Neighbourhood Plan's policies against the coding criteria produced by Tyldesley Associates, an objective and widely-used approach for assessing the likely effects of different policies. The assessment is set out below.

Coding used for recording effects/impacts on European Sites

Reason why policy will have no effect on a European Site	
1	The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
2	The policy makes provision for a quantum / type of development (and may or may not indicate one or more broad locations)
3	No development could occur through this policy alone, because it is implemented through other DPD policies that are more strategic or more detailed and therefore more appropriate to assess for their effects on a European Site and associated sensitive areas.
4	Concentration of development in urban areas will not affect European Site and will help to steer development and land use change away from a European Site and associated sensitive areas.
5	The policy will help to steer development away from a European Site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
6	The policy is intended to protect the natural environment, including biodiversity.
7	The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European Site.
Reason why policy could have a potential effect	
8	The policy steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development may indirectly affect a European Site.
Reason why policy would be likely to have a significant effect	
9	The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to

	establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.
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Source: *Screening report: 'Draft Further Alterations to the London Plan'* (Forum for the Future, September 2006)

Assessment of policies contained within the Draft Neighbourhood Plan

Policy	Why policy will have no impact on sites (refer to coding matrix above)	Why the policy is likely to have an impact on sites	Essential recommendations to avoid potential effects on European Sites
Employment Policies			
CS EM1	2, 3, 4		
CS EM2	2, 3, 4		
Local Community and Social Needs			
CS CSN1	2,4		
Housing			
CS HO1	2,3,4		
CS HO2	2,3,4		
CS HO3	2,3,4		
Sustainable Transport			
CS TR1	2,7		
CS TR2	2,7		
Green Infrastructure			
CS GI1	6, 7		

CS GI2	7		
CS GI3	6, 7		
Design Quality			
CS DQ1	7		
CS DQ2	7		
CS DQ3	7		

- 1.16. The assessment of the Draft Camley Street Neighbourhood Plan policies using the coding methodology found that the Plan's policies generally add detail and complement policy approaches set out in the Camden Local Plan 2017. The Plan's housing and employment policies are not considered to have a significant effect on the Natura 2000 sites. The overall scale of growth likely to come forward in the Camley Street area has already been 'screened out' in the Draft Local Plan Screening.
- 1.17. The Neighbourhood Plan envisages that the Camley Street area will provide intensification of both housing and employment floorspace. The emphasis on the retention of employment floorspace and occupiers reduces the likelihood of these uses being displaced to alternative locations where the impacts on Natura 2000 sites could be greater.
- 1.18. The Draft Neighbourhood Plan seeks to make best use of land, for example from the introduction of housing into low density employment sites. This should lead to the provision of additional housing in the Borough in a highly accessible, sustainable location, with good access to tube and bus services within a walking distance. The requirement for a mix of housing meeting the needs of people with different needs and incomes is likely to strengthen the long-term sustainability of the area. Any effect of the Draft Plan on Natura 2000 sites is likely to be either neutral by concentrating development in inner London, away from these sites.
- 1.19. Other policies, such as CS CSN1 relating to the provision of social infrastructure, are likely to contribute to sustainable communities. This increases the prospect of transformation of the Camley St area being effective and long-lasting. Improvements to local facilities and the amenity of the area generally is likely to mean that people will be able to meet their needs more easily in the immediate locality. Any effects on the Natura 2000 sites are likely to be neutral.
- 1.20. The Plan seeks to manage any negative impacts of the construction process and operation of development through measures set out in Policy CS TR1. This includes the provision of off-site loading bays, use of delivery management plans, the promotion of environmentally-friendly and active modes of travel and segregation of cyclists and pedestrians. This builds on policies seeking to manage and mitigate the impacts of development in the Camden Local Plan. These mitigation and enhancement measures are unlikely to have an adverse effect on the Natura 2000 sites.
- 1.21. The Draft Neighbourhood Plan's suite of green infrastructure policies should positively enhance the area and ensure that the use of open space for recreation and play is maximised. A summary of the policies and proposals is set out in Box 1 below. The Plan promotes greening measures, such as pocket parks and living walls, to improve the attractiveness of the area and seeks to resist

proposals that would be detrimental to existing green infrastructure, such as trees and gardens. It seeks to improve connectivity with existing open spaces in the surrounding area which may be able to provide a wider range of/ alternative experiences to the green and open spaces within the Plan area. The Plan also aims to deliver biodiversity gains as a part of new development schemes. Taken together, these measures should have a neutral effect on Natura 2000 sites and reduce the likelihood of the local population having to travel beyond the local area to meet their needs for recreation. They are likely to have a positive effect on the natural environment more broadly. The Draft Plan has fully considered the area's environmental context and the available opportunities to realise environmental gains.

Box 1

The Council considers that Draft Camley Street Neighbourhood Plan has a number of positive policies to help safeguard and enhance the natural environment. These are considered to support Policies A2 (Open Space) and A3 (Biodiversity) of the adopted Camden Local Plan 2017. The following measures are proposed:

- Securing developer contributions towards local greening such as pocket parks, living walls and improvements to the Regent's Canal;
- Resisting the loss of smaller amenity areas, trees and vegetation and enhancing these where possible;
- Improving green corridors and links to surrounding open spaces;
- Protection of residential gardens;
- Resisting proposals that would harm Camley Street Natural Park and Elm Village Open Space;
- Provision of open space within new developments including both public and private amenity areas
- Incorporation of sustainable food growing in developments or community food growing;
- Biodiversity enhancements such as bird and bat boxes and invertebrate loggeries;
- Protection of existing trees;
- Safeguarding of important local views to assets including the Camley Street Natural Park;
- Opportunities for volunteers to become involved in nature conservation work.

- 1.22. Policy CS DQ1 relates principally to the built environment. It seeks opportunities for new open spaces to be well-integrated into the design of new schemes, a factor that is likely to directly impact on their use. The policy looks to support the wider transformation of the area, addressing the issues in the Plan area around poor environmental quality and the condition of the public realm. Policy CS DQ2

aims to enhance the walkability of the area and connections through it. This is an important component of the future vision for the area and could improve access to areas of open space. Policy CS DQ3 seeks provision of private amenity / communal space, the opening up of new routes and plans positively for the retention and enhancement of locally important views, e.g. to Camley Street Natural Park. The Council considers that the Plan's design policies will not harm the status of the Natura 2000 sites and any effects are likely to be neutral. Improvements to the amenity of the area and the quality of the built and natural environment are generally positive outcomes which are likely to result in increased opportunities for recreation.

Conclusion

- 1.23. The Council has fully considered the scope and content of the Draft Camley Street Neighbourhood Plan for the purposes of determining whether the policies and proposals are likely to give rise to any significant adverse impacts on the network of Natura 2000 sites. It is the Council's opinion that the Draft Plan will not do so. In making its assessment, the Council has had regard to the Screening Opinion that was previously undertaken on the Draft Local Plan. This found that the future growth and development of Camden set out by the Local Plan was unlikely to significantly effect the Natura 2000 sites.
- 1.24. The Draft Neighbourhood Plan builds on the Council's adopted approach and does not introduce new policy requirements, or diverge from the Camden Local Plan in a way, that alters the Council's findings at a strategic/Borough-wide level. This Screening Opinion finds that the Draft Neighbourhood Plan is likely to have some positive environmental outcomes by the attention it gives to improving green infrastructure and the public realm within the Camley Street area. The impact of the Draft Plan on the Natura 2000 sites is, however, most likely to be neutral. The Plan's strategy helps to make best use of available land through the intensification of development and a wider mix of uses. This should lead to a more sustainable community and successful place, meaning that the area would be able to better address its existing, and future, needs.

Appendix 3
Equalities Impact Assessment

Equalities Impact Assessment

Camden Council

What is an Equality Impact Assessment?

An Equality Impact Assessment (“EIA”) is a way of analysing a proposed organisational policy or decision to assess its effect on people with protected characteristics covered by the Equality Act 2010*. To meet the Council’s statutory duty the EIA should also address issues of advancing opportunities and fostering good relations between different groups in the community.

The Council has a strong tradition of ensuring equality both in terms of service delivery and within its workforce. To help us maintain this tradition it is essential that you start to think about the EIA process before you develop any new activity or make changes to an existing activity. This is because the EIA needs to be integral to service improvement rather than an ‘add-on’. If equality analysis is done at the end of a process it will often be too late for changes to be made.

The courts place significant weight on the existence of some form of documentary evidence of compliance with the Public Sector Equality Duty* when determining judicial review cases. Having an EIA as part of the report which goes to the decision makers and making reference to the EIA within that report helps to demonstrate that we have considered our public sector equality duty and given “due regard” to the effects the decision will have on different groups.

The EIA must be considered at an early stage of the formation of a policy/decision and inform its development, rather than being added on at the end of the process. The EIA form should be completed and updated as the policy / decision progresses and reviewed after the policy or change has been implemented.

If a staff restructure of organisational change is identified as necessary following the review of an activity then an EIA needs to be completed for both stages of the process, i.e. one when the activity is reviewed and one when the restructure or organisational change is undertaken.

Please note all sections must be completed. However the obligation is to have due regard and it may be that while an issue requires the completion of an EIA, the matters at hand may not lend themselves to some of the obligations, for example fostering good relations. As long as this has been properly considered it is legitimate to conclude that this cannot be applied in a particular case.

*Please read the notes at the end of this document.

Name of proposed decision/policy being reviewed:

Draft Camley Street Neighbourhood Plan

Question 1

What is changing and why?

If the issue is going for decision, e.g. at Cabinet meeting, what are the decision makers being asked to decide? If you are reviewing a policy what are its main aims? How will these changes affect people?

[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]

Neighbourhood plans are statutory planning documents prepared by local communities. In Camden, this work is being undertaken by Neighbourhood Forums. Neighbourhood plans provide planning policies relating to the development and use of land in the neighbourhood area, which is formally designated following local consultation. The Camley Street Neighbourhood Forum is now preparing a neighbourhood plan for the Camley Street neighbourhood area.

Neighbourhood plans can address matters not already addressed by existing Council policy or set out additional policy requirements where this is justified by local circumstances and supported by robust evidence. They should take a positive approach in shaping and directing development and should help support strategic planning policies, including those in Camden's Local Plan. The Camley Street Neighbourhood Plan has therefore been prepared taking into account the strategic approach of the adopted Local Plan which was itself also subject to an Equalities Impact Assessment (EqIA).

Neighbourhood Plans are independently examined against a number of tests – or 'Basic Conditions'. If the Examiner concludes that the Plan meets these tests, or would be capable of doing so with modifications, the Plan can proceed to a local referendum. If a majority of residents support the use of a neighbourhood plan in making decisions on planning applications, it will become part of the development plan – the starting point for planning decisions – in the neighbourhood area.

Neighbourhood Forums must undertake consultation on a draft Plan (sometimes referred to as the 'Regulation 14 stage'). The Council has provided advice to the Camley Street Neighbourhood Forum on a number of draft policies and the Forum has undertaken a period of consultation on its draft Plan starting in November 2018 and ending in January 2019. Camden Council submitted a representation which included input from a number of Council services.

Planning policies are wide ranging in nature and can have social, economic and environmental effects. They can be used to protect what is valued about an area, minimise any harmful impacts arising from development and ensure that new development, including changes of use, make a positive contribution to the local area. The planning system exists to ensure that development is in the public interest and contributes to sustainable development. Neighbourhood plans form one element of the 'development plan', alongside Camden's own planning policies (including the adopted Local Plan and Site Allocations document) and the London Plan. Decisions on planning applications are determined in accordance with the development plan, unless material planning considerations indicate otherwise. A proposal's impact on people with protected characteristics can be a material consideration.

Notes to Question 1

- Summarise briefly and precisely just what the decision is about. In particular what changes will happen if this decision is agreed and put into effect? What happens now and what will happen in the future? What will be different?
- **Do not cut and paste the report or policy** but concisely restate it, considering equalities issues directly against the facts
- **Focus on the impacts on people** e.g. the users of any facility or service.

Question 2

Who will be affected by this decision and how?

In particular do those from protected groups benefit or will they experience specific and disproportionate impacts? Will there be any direct or indirect discrimination?

[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]

Planning policies can have disproportionate effects for people with protected characteristics (because of age, a disability, gender reassignment, marriage/civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation). For example, young and older people are likely to spend more time in an area and therefore will receive the greatest benefit from policies seeking to improve the built environment, particularly where this promotes the retention/enhancement of open space and greenery; or addresses issues such as accessibility and inclusion. Planning policies may also influence the type, size, layout and design of housing. They may also help to manage the mix of development within an area or development site. Planning documents, however, could lead to negative outcomes for people with protected characteristics. This can include cases where the needs of protected groups are not properly considered as policies are developed or their wording/structure is such that unintended consequences might arise.

Planning policies can also be used to harness the benefits of growth for local communities. Where development is expected to lead to an increase in an area's population (including working or visitor population), planning obligations can be secured to address this additional demand. This can indirectly provide benefit for the existing local community. Local people can identify and prioritise projects they wish to receive funding from the Community Infrastructure Levy (CIL), a charge applied to most types of development.

The data below considers the composition of Camley Street's resident population, with reference to the Equality Act's protected characteristics. It should be borne in mind that Camley Street also has a significant working population and the household data will provide some indication of its characteristics where people both live and work in the neighbourhood area.

Camley Street neighbourhood area sits within the St Pancras and Somers Town ward. The ward is much larger than Camley Street itself however its demographics provide an indication of how this part of inner London, in proximity to the main rail terminals, compares to Camden, London and national/England benchmarks. We have also looked at data pertaining to Census Output Areas. These do not correspond neatly with the designated area; however, we have identified a 'core area' – i.e. best fit, made up of 4 Output Areas which fall predominantly within the Plan area.

Except where stated otherwise, the Council's data draws on the results of the 2011 Census.

The current resident population of St Pancras and Somers Town ward (mid 2017 estimate) is 17,000 people and has grown faster than the overall population of Camden (at 23.6% compared with 9%), the fastest growth of any ward since 2011. A significant proportion of this is likely to be related to the comprehensive redevelopment of the railway lands at King's Cross (known as the King's Cross Central development).

AGE

The St Pancras and Somers Town ward has a relatively young population profile with a mean age of 32.9 years compared to Camden's overall 36.8 years. It ranks the 2nd youngest in Camden by median age. Children (under 16 year olds) form 18.2% of the population while older people (aged 65+) account for 8.1% of the population. At the time of the 2011 Census, 16.1% of Camden's population was under 16 and 10.9% were over 65. This shows that the ward has a slightly younger population profile than the borough as a whole. The ward age profile is also

slightly younger than London's population. Similar findings are borne out for the Census Output areas. The Census Output area data also showed that the second largest population group was 16-29 year olds – this population was 3% higher than the borough as a whole.

Children and young people are likely to be particularly dependent on good quality spaces (such as parks) to meet, play and socialise. They are also likely to be one of the heaviest users of active forms of travel such as walking and cycling. For the youngest children, their ability to use open space and the public realm is likely to be shaped by the attitudes and availability of time of parents or carers. The needs of children and young people and parents/carers can sometimes be overlooked or not be adequately considered when plans for an area are being developed. It is important that any significant/ major developments include engagement with children and young people living in the area; they may be able to offer perspectives which can improve the way housing/accommodation, facilities and services are offered and function over time. This is also relevant to the area's student population. As with older people, public/community safety may sometimes be an issue and it is therefore important that the public realm is designed to be safe and welcoming.

There is a small elderly population (potentially little more than 100 people in the area are 60 years+), which the evidence suggests is likely to be disproportionately affected by poor health and/or disability. Older people are also widely recognised as being at greater risk from social isolation or exclusion because of the greater proportion of the population that lives alone. It is important that the public realm and local services are designed in such a way that take into account the specific needs of these groups, this includes their perception of public/community safety. Possible mobility, health problems and the likelihood of more limited social contact points to the importance of providing age-friendly services and activities in the area.

ETHNICITY

The ward has significant differences in terms of its ethnic composition compared to Camden or Greater London. Only 34.6% of the population is 'White British' compared with 44% for Camden and 44.9% for Greater London. There is a high Bangladeshi population (15.1% of the total) compared to only 5.7% in Camden and 2.7% for London. The 'Black Caribbean' population was 9.5% but only 4.9% in Camden and 7% for London. The third largest ethnic group was 'White Other' (13.2%) similar to the proportion found in Greater London but much lower than the level found nationally (4.4%). The proportions of 'White British' and other ethnic groups were similar for the Census Output Areas; the top 2 non-UK countries of birth were Bangladesh and Somalia. Particular care needs to be taken in the Plan area to ensure that any new community facilities or services respond to the needs of the ward's minority populations.

Community safety/perception of safety is a particular concern for some Black and Minority Ethnic groups and needs to be considered when public realm schemes are being considered. It is also likely that women belonging to some minority ethnic groups are more likely to be at home during the day and will therefore be disproportionately affected by the quality of the local built environment. Only 1 in 4 Bangladeshi women in England work compared with nearly 3 in 4 White British women. Health status and life expectancy of minority ethnic groups can also vary significantly from the wider/average population reinforced by experience of deprivation. Minority communities nationally tend to be disproportionately concentrated in overcrowded housing meaning improvements in housing conditions and local amenities are likely to provide significant benefit for these groups.

RELIGION

The ward also has significant differences in terms of identification with a religion. 22.3% of the ward's residents stated in the Census that they have 'no religion', this is much lower than Camden (29.1%) and similar to Greater London (20.7%). While the proportion of the population that stated they were 'Christian' was similar at both ward and borough level, there was a much higher proportion of the population that stated 'Muslim' (29.0% compared to 13.8% for Camden).

The population stating 'Jewish' was much lower than Camden (0.4% in the ward compared to 5.1%). This is likely to be relevant to the types of facilities and services that are provided to meet the needs of the local Muslim population. Since the 2011 Census, the ONS has found that 'Religion not stated' in Camden was overstated (equivalent to about 4%), meaning that more people are likely to have a religion. This data has not subsequently been broken down to a local level.

DISABILITY AND HEALTH

The Census found that 18.4% of the ward's population considered that they had a 'Limiting Long-term Illness'. This was higher than comparators at the Borough (14.4%), London (14.2%) and national level (17.9%). It is widely acknowledged that there are links between reported health and wellbeing and socio-economic status. Across a number of dimensions (including health and disability), the Indices of Deprivation (IOD) identify the proportions of people and households experiencing deprivation. The IOD also takes into account levels of income, employment, education, skills and training, access to housing and services, crime and the living environment.

St Pancras and Somers Town is ranked as the most deprived ward in Camden with one Lower layer Super Output Area (LSOA) falling within the 10% most deprived in England and 6 LSOA within the 10-20% most deprived. Department for Work and Pensions data (2016) showed that 8.8% of the working age population in the ward were claiming Employment and Support Allowance / Incapacity Benefits. Employment and Support Allowance is paid to people experiencing illness or disability. 2.3% of the population claimed a carers' allowance. The relatively high levels of deprivation may suggest a particular need to target policies to overcome disadvantages experienced by the local community. There are a number of LSOA that fall partly within the Camley Street neighbourhood area. These show that the LSOA in the northern part of the area are within the 20 to 30% most deprived LSOA (by ranking in England). The mid part of the area is in an area ranked as 10 to 20% most deprived while the southern part of the area is within the 10% most deprived LSOA.

Life expectancy in Camden has been improving over time rising to 81.1 years for males and 86 years for females. However, life expectancy across LB Camden is unequal and St Pancras and Somers Town has the third lowest life expectancy amongst wards – 78.8 years for males and 81.4 years for females.

For the Census Output Areas, the data appears mixed. For example, 86.6% of the population considered that their health was 'Good or Very Good' compared to 84% in Camden and 88.8% considered that their day to day activities were 'not limited' compared to 85.6% in Camden. There was some evidence that there may be barriers to employment in the Census Output areas – 8.9% of households with dependent children had no adults in employment (vs 4.7% for Camden) and 4.8% were economically inactive because of long-term sickness or disability (vs 4.4% for Camden).

People with disabilities will often experience the built environment in different ways to the wider population. If these differences are not adequately considered when developments are being designed, then relative disadvantage and social isolation can be further entrenched. Buildings and spaces need to be legible and easy to navigate, free of physical barriers and appropriately lit. Transport facilities and services need to be planned for ease of use and convenience. Particular care also needs to be taken to provide suitable parking arrangements (car or bike) for disabled users. As with the young and elderly, people with disabilities may participate less than the wider population in public life and as a consequence feel more isolated.

PREGNANCY AND MATERNITY

The proportion of lone parent households was significantly higher in the ward (10.7%) than Camden (6.4%) or London (8.5%). The rate of teenage conceptions was found to have no significant difference to England but relatively higher than Camden or London (source: EM Public

Health Observatory). For the Census Output Areas, 9.5% of households were lone parents with dependent children.

Some of the issues relevant to the young and elderly apply to this protected characteristic. Young / pregnant women are more likely to be present at home and therefore dependent on access to local facilities and services. As highlighted above, parents and carers may also play an enabling role in assisting and supervising young children's use of open space. The quality of the local environment, particularly issues around amenity (noise, air quality etc.) are likely to disproportionately affect this protected group. Flexible working arrangements may mean that young parents may be at home for part of the working week to undertake childcare.

SEXUAL ORIENTATION AND TRANSGENDER

There is limited information available concerning both these groups. Some of the issues are applicable to wider populations discussed above, particularly around community safety and access to safe spaces and facilities. This has been magnified by recent reported increases in hate crime involving LGBT populations. LGBT communities are also more vulnerable to social isolation. This highlights the importance of facilities and spaces which can provide a safe environment in which LGBT communities are able to meet.

Notes to Question 2

- Here use data to show who could be affected by the decision. Consider who uses the service now and might use it in the future. Think about the social mix of the borough and of our workforce.
- If available use profile of service users and potential users / staff by protected groups: (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation). You could consider the following:
 - Take up of services, by protected group if available;
 - Recommendations from previous inspections or audits;
 - Comparisons with similar activities in other departments, councils or public bodies;
 - Results of any consultation and engagement activities broken down by protected groups (if available) - sources could include, complaints, mystery shopping, survey results, focus groups, meetings with residents;
 - Potential barriers to participation for the different protected groups;
 - National, regional and local sources of research or data – including statutory consultations;
 - Workforce equality data will be provided by your HR change adviser for organisational change / restructure EIAs and
 - For organisational change / restructure EIAs include the results of any consultation or meetings with staff or trade unions.
- **Do not simply repeat borough wide or general service equality data** – be as precise and to the point as possible.
- If there are gaps in equality information for some protected groups identify these in this section of the form and outline any steps you plan to take to fill these gaps. Consider:
 - Any relevant groups who have not yet been consulted or engaged;
 - Whether it is possible to breakdown existing data or consultation results by different protected groups;
 - If you are conducting an organisational change / restructure EIA and there are data gaps consider asking affected staff to update their details on Oracle.
- We are under a legal duty to be properly informed before making a decision. If the relevant data is not available we are under a duty to obtain it and this will often mean some consultation with appropriate groups is required.
- Is there a particular impact on one or more of the protected groups? Who are the groups and what is the impact?
- Consider indirect discrimination (which is a practice, policy or rule which applies to everyone in the same way, but has a worse effect on some groups and causes disadvantage) - for example not allowing part-time work will disadvantage some groups or making people produce a driver's licence for ID purposes.

Question 3

Does the proposed decision have an impact (positive or adverse) on our duty to eliminate discrimination/harassment and victimisation, promote equality of opportunity or foster good relations between different groups in the community (those that share characteristics and those that do not)?

The Draft Camley Street Neighbourhood Plan has policies seeking to safeguard employment floorspace, expand the provision of affordable housing, limit the growth in student housing and provide various forms of infrastructure as development takes place.

This section considers each of the policies in the draft Neighbourhood Plan and identifies whether they are likely to have positive, negative or neutral effects on people with protected characteristics. Where potential positive or negative effects are identified, a short explanation is provided.

Policy CS EM1 Neutral / Positive

The policy relates to the provision of existing employment floorspace for the B1(c) and B8 Use Classes. It seeks to ensure that where (re)development proposals come forward, the impacts on existing business occupiers are successfully managed. It also refers to the rents applicable to new employment floorspace and supports provision of affordable workspace.

It is recognised that finding affordable and suitable space for Small and Medium sized Enterprises (SMEs) in London, including 'start-ups', can be challenging. Without such policy support it is likely this kind of floorspace could be squeezed out of Central London. Locations such as Camley Street on the fringes of the Central London area provide an opportunity to deliver affordable workspace on a viable and sustainable basis. Although SMEs may be established by and employ people of any age, the Camley Street area's location close to major London universities and institutions/businesses forming the 'knowledge quarter' (<https://www.knowledgequarter.london/>) suggests that a significant proportion of future SMEs are likely to employ young people, such as university leavers. The policy may therefore have positive benefits for younger people by supporting the provision of affordable workspace.

Policy CS EM2 Neutral

The policy seeks to address the needs of existing business occupiers when redevelopment proposals are being developed. This particularly applies to businesses where they support the functioning of the Central Activities Zone (CAZ) or have importance to Camden's economy.

Any effects will be dependent on the nature of the businesses involved and their individual role in supporting people with protected characteristics. This detail is not likely to be available until planning applications are submitted.

POLICY CS CSN1 Positive

This policy takes into account the need to develop and enhance community infrastructure provided in the Camley Street area. This will ensure that the impacts of growth – an increase in the resident and working population – are managed successfully and do not lead to unacceptable pressure being placed on services used by the existing population. The Plan, and its supporting consultation has provided evidence that social infrastructure in the Plan area is currently quite limited. This policy could be enhanced further by reference in the supporting text of how investment in local infrastructure might help to support people with protected characteristics. For example, it should be designed and developed around the needs of protected groups, giving emphasis to any existing gaps in provision.

POLICY CS HO1 Positive

This policy seeks to maximise provision of affordable housing in the Plan area. Access to affordable housing has a significant influence on a range of health and wellbeing indicators. There is currently evidence that some of the existing population in the area are living in overcrowded or unsuitable accommodation. Provision of a range of affordable housing types increases the likelihood that new households can be formed in proximity to existing family members. People in some protected groups (e.g. people with disabilities and from Black and Minority Ethnic groups) are disproportionately dependent on the provision on affordable housing. While the Draft Neighbourhood Plan does not specifically reference the need for specialist housing for people from protected groups, this matter is dealt with in detail by the adopted Camden Local Plan and therefore further reference in the Neighbourhood Plan is not necessary.

POLICY CS HO2 Positive

It requires the provision of a proportion of housing when commercial schemes are being developed. This builds on the Council's Local Plan mixed use policy (H2) which promotes this approach in Central London. It is considered to be positive insofar as a proportion of this housing is likely to be delivered as affordable tenures and may therefore be particularly beneficial to groups with protected characteristics who are disproportionately accommodated in affordable housing.

POLICY CS HO3 Negative

The policy attempts to manage the proliferation (and cumulative impacts) of student accommodation in the Plan area. Policies seeking to manage the supply of student accommodation need to be sufficiently flexible to adjust to changing circumstances, e.g. whether there is a continuing 'overconcentration' of student accommodation. At present, the majority of purpose built student accommodation in Camden will be provided as the sole use on a site. The Forum need to demonstrate how the Plan's restriction on "mono use student blocks" might impact on the delivery (i.e. viability) and operation of student housing schemes. If the policy acted as a barrier to the delivery of most/all student housing over an extended period of time – and especially if this occurred in the absence of an overconcentration of student accommodation - it could have a detrimental impact on the ability of young people/students being able to access accommodation in proximity to the institutions they attend. The location of Camley Street on the fringes of Central London means that students are able to undertake most journeys on foot or by bike which reduces their day-to-day living costs.

It is noted that dedicated student blocks will often be able to provide a range of facilities on-site to address student needs, e.g. gyms and communal areas. The Forum should establish whether limiting the type of student accommodation that can be provided would have any effect on the provision of facilities important for students' wellbeing and quality of life. Easy access to facilities/services at evenings and weekends is likely to be particularly important.

POLICY CS TR1 Positive

The policy seeks to manage the impacts of vehicular traffic in the Plan area, including deliveries. As stated under Question 2 of the EqIA above, certain groups with protected characteristics are likely to spend disproportionate amounts of time in the locality, such as young and older people. The presence of heavy goods vehicles, conflicts between pedestrians, cyclists and vehicles and pollution from vehicles can impact on people's enjoyment of the public realm. In this context, parents may be especially wary to allowing children to play unsupervised. This can be particularly crucial where residents live in close proximity to employment uses. If people do not perceive the local environment to be safe, they are less likely to use local walking and cycling routes. Noise and emissions from vehicles can affect the way people use public spaces and move around an area and can be a barrier to older and disabled people from participating in public life. Improvements to the public realm are likely to disproportionately benefit people from protected groups where they are designed and managed successfully.

POLICY CS TR2 Positive

This policy highlights specific measures that can maximise opportunities for walking and cycling. These measures address permeability, legibility and support facilities, e.g. cycle storage and parking. The policy could be enhanced by consideration of/specific reference to the needs of people with protected characteristics in the Plan area, for example measures that may be needed to maximise accessibility and comfort for people with disabilities, based on the area's particular opportunities/ characteristics.

POLICY CS GI1 Positive

This policy seeks to protect and enhance open spaces in the Plan area. Open spaces are important for recreation, opportunities for social interaction and can contribute to wellbeing, e.g. through the provision of greenery. This policy is likely to disproportionately benefit people with protected characteristics, for example parents, who tend to spend a longer part of the day within the Plan area. The policy also recognises the private amenity benefits provided by garden spaces and the ability of open spaces to deliver impact when they are joined as part of a network with green corridors and links. Protecting open spaces will ensure that existing benefits can be sustained into the future.

POLICY CS GI2 Positive

This refers to specific greenspace measures that could be implemented in the Plan area and which developer contributions may be able to help fund. This includes the creation of new routes and pocket parks. As with Policy CS GI1 above, this will benefit people who disproportionately spend more time in the Plan area, e.g. the young/students, older people and parents. The policy could be enhanced by consideration of/specific reference to the needs of people with protected characteristics in the Plan area, for example measures that may be needed to maximise accessibility and comfort for people with disabilities.

POLICY CS GI3 Positive

This features a range of measures likely to have positive effects on the wellbeing of the resident and worker population in the Plan area. Examples are the use of Sustainable Urban Drainage Systems (to help prevent surface water flooding), the provision of living walls and food growing opportunities and promotion of volunteer engagement in nature conservation work. The measures are either likely to benefit people directly through their participation in activities (nature conservation activities can be tailored to specifically include people with protected characteristics such as school children, teenagers and people with disabilities) or indirectly through general improvements to the area's environment.

The kinds of 'grassroots' community action envisaged by this policy is likely to provide opportunities for people from different protected groups to come into contact with one another and gain a better understanding of the perspectives and challenges they experience. The positive benefits could potentially be sustained over a long time period where local residents or workers take on the management and responsibilities for looking after and maintaining elements of green infrastructure.

POLICY CS DQ1 Positive/Neutral

This holistic design policy features a number of elements that contribute to good place making, such as improving connectivity and safeguarding residents' amenity. It seeks to ensure that developments are sensitive to their context and designed to a high quality. The policy could be enhanced by consideration of/specific reference to the needs of people with protected characteristics in the Plan area, for example measures that may be needed to maximise accessibility and comfort for people with disabilities. However, it is noted that these matters are already given ample coverage by the adopted Camden Local Plan and accompanying planning

guidance and therefore no further action is recommended.

POLICY CS DQ2 Positive/Neutral

This policy largely repeats considerations referenced elsewhere in the Neighbourhood Plan. There is particular emphasis to wayfinding and there is reference to issues experienced by the disabled / less mobile in paragraph 6.29.1. The policy could potentially be enhanced by referring to the principles of Transport for London's 'Healthy Streets' initiative.

Notes to Question 3

- Here, think about our other duties (see the notes at the end) and do the proposals impact (positive and or negative) upon those wider duties and aspirations?
- What might say a reduction in the hours of a facility that mainly serves a particular group have on our wider duties?
- Examples of eliminating discrimination: Taking action to ensure that services are open to all groups – e.g. targeting help at particular deprived sections of the community or funding services who work to prevent discrimination
- Does take up of the activity differ between people from different protected groups?
- Have the outcomes of your consultation and engagement results identified potentially negative or positive impacts?
- Are some groups less satisfied than others with the activity as it currently stands?
- Is there a greater impact on one protected group, is this consistent with the aims of the activity?
- For organisational change / restructures analyse the outcomes of consultation with staff and trade unions and analyse the staff data provided by your change adviser
- If you have identified negative impacts include details of who these findings have been discussed with (e.g. Legal, HR) and their views
- Are there any further changes that could be made to deliver service improvements or make the activity more responsive?

Question 4

If there is an adverse impact, can it be avoided?

If it can't be avoided, what are we doing to mitigate the impact?

[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]

The potential effects of the policies on people/groups with protected characteristics has been considered under Question 3.

This identifies that all but one (CS HO3) of the Plan policies are expected to lead to either 'positive' or 'neutral' outcomes. Many of the Neighbourhood Plan's policies seek to improve the quality of the environment for all, manage/pre-empt potential conflicts between residential and commercial uses or promote greater community action or civic pride, for example participation in food growing or nature conservation projects. Some of the draft policies will be particularly beneficial for protected groups, especially the young, parents and elderly, who tend to spend more time closer to home, for example by the Plan's promotion of improvements to the street environment, open spaces and community facilities.

Where development could increase pressure on existing facilities or give rise to harmful impacts on assets used or enjoyed by residents, the Plan has identified how this should be managed. It sets out measures to improve sustainable transport modes and green infrastructure which may potentially be funded by developer contributions. The Plan also seeks to maximise the provision of housing/affordable housing which is a pressing concern in Camden and London. It is known that people with protected characteristics are often disproportionately affected by problems associated with overcrowded and unsuitable accommodation.

We have identified that the wording of Policy CS HO3, which seeks to manage the impacts of student accommodation, as framed may have unforeseen consequences, potentially inhibiting the delivery of all/most student housing over the Plan period. The effects of the policy should be clarified. Restrictions on access to student housing could have a negative impact on young people/students who need accommodation with convenient access to the institution/university at which they study. The Neighbourhood Plan's restriction of "mono use student blocks" may also have a significant impact on the delivery of new student housing by making it unviable for operators to locate in the Plan area. Existing typologies of student housing often provide access to ancillary facilities on-site, which can support social interaction and wellbeing, such as communal areas.

We have also identified a number of policies (CS CN1, CS TR2 and CS G12) where further advice could be given within the Plan on how the approach might deliver positive outcomes for particular protected groups. Clearly, some of the measures identified in the Plan, e.g. green infrastructure projects, will have a universal benefit for anyone in the Plan area; however there may be opportunities, particularly in supporting text, to describe any actions that may help to address gaps or challenges experienced by the existing population of the Plan area.

Notes to Question 4

- Assuming there is an impact, what are we going to do about it? We need to make sure the **decision makers understand the impacts**
- All our policies and decisions should be designed to eliminate discrimination and contribute to our other obligations such as promoting good relations.
- If it can't be avoided can it be mitigated in some other way?
- There might be decisions elsewhere or perhaps additional spending on other services which could reduce the impact. Beware of simply saying that we will direct service users to other services or resources without considering the feasibility of doing so or the knock-on effect for those services
- We don't have to completely eliminate a negative impact, but we must identify it and try to mitigate it and the **decision makers must be in a position to fully understand the implications of their decision and balance off the competing interests** – e.g. the impact against the need to make savings and balance our budget

Question 5

Could any part of the proposed activity discriminate unlawfully?
Can we advance equality of opportunity via this decision/policy?
Can we foster good relations via this decision/policy?

[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]

We have identified in Question 4 potential adjustments to the draft Neighbourhood Plan to minimise disadvantages affecting people with protected characteristics. Taken as a whole, it is clear that the Plan has taken into account the needs of people with protected characteristics, e.g. Policy CS DQ2. However, in some cases the Plan could be more explicit about the issues and challenges affecting these groups, and specific steps that might be taken as part of the planning process to resolve them (having regard to the opportunities and characteristics of the Plan area). This is particularly relevant where the Plan refers to specific types of infrastructure needed to support development proposals. The Plan could also include a policy criterion or statement seeking appropriate local user groups to be involved in the design and development of any infrastructure they are likely to use.

It is also important that the full range of potential impacts of Policy CS HO3 are fully understood. As currently framed, this approach prevents the impacts of individual schemes from being considered on a case-by-case basis, even if evidence and monitoring points to a decline in the relative concentration of student housing in the area. The approach is particularly restrictive because it 'rules out' a particular type of student accommodation – i.e. mono use student blocks, when this is the main way in which operators in Camden and London currently deliver purpose-built student housing. The policy could impact on some young people by severely limiting the ability to access accommodation in the Camley Street area, who would need to find accommodation in alternative locations, possibly with more limited opportunities to walk and cycle to the place of study. The policy may also mean that students could lose the ability to access supporting infrastructure to meet their day to day needs, which dedicated student blocks are able to provide on-site.

With the exception of Policy CS HO3, it is considered that the draft Plan provides a positive vision for the neighbourhood. It seeks to challenge poor environmental factors currently affecting the area and aims to sustain and enhance the sense of community. A range of potential improvements to social and green infrastructure are proposed for the Plan area and have been identified following consultation with local residents and businesses. The Neighbourhood Plan also supports the redevelopment and intensification of sites subject to the adjacency and compatibility of different land uses being successfully managed, which is critical if surrounding public and open space are to be adequately used. The policies promoting greater delivery of affordable housing, the 'mixed-use' policy requiring housing alongside commercial development and policies seeking the retention/expansion of commercial floorspace are likely to have positive effects on the existing resident and working population, including people with protected characteristics. As such, there is a recognition in the draft Neighbourhood Plan of the desirability of sustaining, and building on existing social, family and business networks in the Plan area, as future growth and change occurs.

The content of the Neighbourhood Plan has been developed through consultation with residents, businesses and other local stakeholders. The Forum is led by local businesses and includes residents living in the Plan area. Membership of a Neighbourhood Forum (a minimum of 21 members is required and it must promote social, economic and environmental wellbeing) is open to anyone who lives or works in the area or is a local councillor. The Forum's redesignation application (2019) refers to the steps taken to maintain contact with residents and businesses in the Plan area. The Forum undertook a survey of all residents and businesses in the Plan area to inform the emerging approach. Meetings have been held every Spring and Autumn to which all members of the community are invited.

The Camley Street Neighbourhood Plan's policies will complement Camden's Local Plan (which was adopted by the Council in July 2017) by providing further detail about issues which the community consider to be important. As part of the Plan's submission to the Council for independent examination,

the Forum is required to prepare a 'Consultation Statement'. This will describe in detail the efforts made by the Forum to engage widely, including with 'protected groups', in preparing the Neighbourhood Plan.

The Council considers that the Draft Camley Street Neighbourhood Plan is a positive, forward looking document setting out how future change in this area might be managed. The Plan identifies particular sub areas where future development and intensification is expected to take place. These sites will help to address a range of needs relevant to both LB Camden and the neighbourhood area. It is anticipated that further detail about the principles for development on key sites in the Camley Street area will be included as part of Camden's ongoing review of the 'Site Allocations' document. Work on this Plan commenced in 2018.

Notes to Question 5

- **There may be decisions or policies where this is not going to be applicable. Explain this briefly in the box above. The important point is that it is carefully considered.**
- Suggest positive steps that can be achieved towards our statutory obligations to remove or minimise disadvantages suffered because of protected characteristics, e.g. taking steps to meet the needs of people from the different backgrounds when they are different to the needs of others, encouraging participation from groups when participation is disproportionately low
- Advancing equality of opportunity - (NB this does not apply to marriage and civil partnership). **This is a “positive duty”** which requires public authorities to consider taking proactive steps to root out discrimination and harassment and advance equality of opportunity in relation to their functions—from the design and delivery of policies and services to their capacity as employers. The duties require us to give consideration to taking positive steps to dismantle barriers. Advancing equality of opportunity might require treating some groups differently e.g. targeting training at disabled people to stand as councillors.
- **The legislation requires when we have due regard in terms of advancing equality of opportunity to:**
 - a. **Remove/minimises disadvantage suffered by those who share a characteristic and is connected to it**
 - b. **Take steps to meet the different needs of those who share a characteristic**
 - c. **Encourage those who share a characteristic to participate in public life or any other activity when participation is disproportionately low.**
- Advancing opportunity includes the fact that the steps needed to meet the needs of disabled persons take into account the disabled persons' disabilities
- We are required to have “due regard” to the need to foster good relations between people who share a relevant protected characteristic and people who do not share it. This involves having due regard, in particular, to the need to tackle prejudice, and promote understanding.

Examples

- An employer to provide staff with education and guidance, with the aim of fostering good relations between its trans staff and its non-trans staff.
- A school to review its anti-bullying strategy to ensure that it addresses the issue of homophobic bullying, with the aim of fostering good relations, and in particular tackling prejudice against gay and lesbian people.
- Local authority (Not Camden) to introduce measures to facilitate understanding and conciliation between Sunni and Shi'a Muslims living in a particular area, with the aim of fostering relations between people of different religious beliefs.
- Our work to encourage Bangladeshi tenants involvement in TA's.

EIA prepared by: Andrew Triggs, Principal Planner

Date: 13 March 2019

EIA checked by: Brian O'Donnell, Strategic Lead - Planning Policy

Date: 18 March 2019

EIA approved by: _____

Date: _____

(Relevant Director Sponsor)

What to do upon approval

For organizational change: If your EIA relates to internal staff, please send to your HR Business Adviser.

For all other EIAs: Please upload onto Sharepoint via this link:

[Equality Impact Assessment Library](#)

Explanatory Notes

What is our Public Sector Equality Duty (PSED)?

Under section 149 all public authorities must, in the exercise of their functions, have 'due regard' to the need to:

1. Eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act; EqA 2010 (section 149(1)(a)).
2. To advance equality of opportunity between people who share a relevant protected characteristic and those who don't; This involves having due regard to the need to:
 - o remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - o take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it (section 149(4)); and
 - o encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Section 149(6) makes it clear that compliance with the PSED in section 149(1) may involve treating some people more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited by or under the EqA 2010 (this includes breach of an equality clause or rule or breach of a non-discrimination rule (section 149(8))).

(Section 149(3), EqA 2010.)

3. Foster good relations between people who share a relevant protected characteristic and those who don't (section 149(1)(c)) (which involves having due regard to the need to tackle prejudice and promoting understanding) (section 149(5), EqA 2010)..

Under the Duty the relevant protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion, Sex, Sexual orientation.

- In respect of the first aim only i.e. reducing discrimination, etc. the protected characteristic of marriage and civil partnership is also relevant.
- In meeting the needs of disabled people we have a duty to take account of their disability and make reasonable adjustments to our services and policies where appropriate.
- We must be able to demonstrate that we have considered and had due regard to all three parts of this duty. We must also look for anything that directly or indirectly discriminates.

What do we mean by “due regard”?

- This is not a question of ticking boxes, but should be at the heart of the decision-making process.
- decision-makers must be made aware of their duty to have due regard – so understand the legal requirements on them;
- There should be an analysis of the data – who is this going to affect and how will it be put against the legal requirements
- We need to have thought about these duties both before and during consideration of a particular policy and we need to be able to demonstrate that we have done so
- The Duty is “non-delegable” so it is for the decision maker themselves to consider with assistance from the report and officer analysis. What matters is what he or she took into account and what he or she knew so it is important to have the relevant papers accompanying the report. The report should make explicit reference to the EIA. the duty is continuing so while this guide is aimed at the point of decision we should at appropriate points review our duties against the decision/policy
- The decision maker must assess the risk and extent of any adverse impact and the ways in which such risk may be eliminated before the adoption of a proposed policy or decision has been taken
- Officers reporting to or advising decision makers must not merely tell the decision maker what he/she wants to hear but need to be “rigorous in both enquiring and reporting to them”
- The duty should be reconsidered if new information comes to light

“

What is due regard? In my view, it is the regard that is appropriate in all the circumstances. These include on the one hand the importance of the areas of life of the members of the disadvantaged ... group that are affected by the inequality of opportunity and the extent of the inequality; and on the other hand, such countervailing factors as are relevant to the function which the decision-maker is performing”

Lord Justice Dyson

”

We need to take a sensible and proportionate approach to this based on the nature of the decision or policy being reviewed