

# Shaping Camden

Camden's Local Development Framework

## Site Allocations Sustainability Appraisal

Additional sites consultation November 2010



## 1. Introduction

### 1.1 Context

We are now preparing the next generation of Camden's planning policies. All councils have to produce a group of documents setting out their planning strategy and policies called a Local Development Framework (LDF). The LDF consists of a Core Strategy, Development Policies and a suite of other Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Core Strategy and Development policies were adopted by the Council in November 2010.

The Site Allocation DPD is still being prepared and will set out the Council's proposals for land and buildings on significant sites which are likely to be subject of development proposals during the lifetime of the LDF. These allocations are intended to assist in delivering the priorities and objectives of the Core Strategy and the London Plan.

The Council has already undertaken consultation on two previous versions of the Site Allocations documents: Issues and Options Version and the Preferred approach. The responses received to these previous consultations have identified a number of new sites which are the subject of this consultation.

As part of the process for preparing the LDF, the Council is statutorily obliged to undertake a Strategic Environmental Assessment (SEA) and Sustainability Appraisal. These procedures have been combined into a single appraisal process entitled 'Sustainability Appraisal' or 'SA', for which the overall aim is to ensure that each document contributes to the achievement of sustainable development.

*SA is 'an iterative process undertaken during the preparation of a plan, which identifies and reports on the extent to which the implementation of a plan will achieve the environmental, social and economic objectives by which sustainable development can be defined'*

SA is an ongoing process, which seeks to improve the sustainability performance of a plan by testing it throughout its preparation in order to expose any weaknesses in its contribution to achieving sustainable development. It is an integral part of good plan-making, and to enable it to be effective and worthwhile, the appraisal must start early in the plan-preparation process. By doing so, SA assists with the identification of sustainability issues and options during the plan preparation process.

The Site Allocations document has been prepared to achieve consistency with and to implement the LDF Core Strategy and Development Policies, which are the main framework documents that will assess all developments and have already undergone/ sustainability appraisal and demonstrated a sustainable approach.

### 1.2 Purpose

This document seeks to determine how the Site Allocations document promotes sustainability. Its role is to assist with the identification of the appropriate approach, in sustainability terms, to predict implications for sustainable development and put forward recommendations for improvement where necessary.

It is important to note that the preparation of the Site Allocations document follows one stage behind the development of the Core Strategy and Development Policies documents, which are now at submission draft stage. The earlier development of the Core Strategy and the Development Policies including their respective sustainability appraisals have provided a framework in which the Site Allocations can progress, that is, the Site Allocations will need to reflect the policies of the Core Strategy and Development Policies.

In line with government guidance (PPS12), we consider that this sustainability appraisal report is in proportion to the nature of the Site Allocations and in context of the framework set by the Core Strategy and Developments Policies documents and their respective sustainability appraisals.

### **1.3 Preparation of the Sustainability Appraisal**

The Site Allocations follows the earlier preparation of and consultation on, the Site Allocations Issues and Options and Preferred Approach documents. These documents were the subject of a SA scoping report which also covered the Core Strategy and Development Policies. The scoping report was the first stage in incorporating SA into the LDF process. It set out a review of the baseline information which gave an understanding of the current state of Camden and how it may change in the future. It included a draft SA Framework and proposals as to how the SA would be carried out. Through consultation with relevant statutory consultees and a wider consultation base, feedback was gained on various elements of the Scoping Report, which were amended as appropriate.

The findings of the Scoping Report consultation have assisted the Council in the development and appraisal of options for the emerging Core Strategy, Development Policies and now the Site Allocations document. This SA report builds on the work done on the Sustainability Appraisals of the Core Strategy and Development Policies which are now at submission stage.

The Core Strategy sets out the Council's intended strategic policy directions for the borough which will be implemented through the Development Policies and other DPDs. Assessment of the sustainability impacts of the Council's approach to the first two documents has already been carried out and has influenced their content and approach. This appraisal therefore needs to be read in this context. It will not reappraise the policy directions of the Core Strategy but rather to look at how the Site Allocations can contribute to the common sustainability objectives of the LDF.

## **2. Non-Technical Summary**

### **2.1 What is Sustainability Appraisal**

In simple terms, Sustainability Appraisal (SA) is a process of assessment to ensure that sustainability is at the heart of decisions on the preparation of new planning policies. In relation to the Site Allocations document it helps ensure that the identification and allocation of suitable sites for development achieves an appropriate balance of positive social, environmental and economic outcomes for Camden and that any adverse effects are minimised or effectively mitigated.

SA is carried out in parallel with the policy development process and is an iterative process that is intended to provide constructive criticism of policy options to ensure that negative impacts on sustainability are minimised and benefits maximised.

### **2.2 Overall outcome of Sustainability Appraisal**

The SA process has found that the overall Site Allocations Preferred Approach will deliver positive sustainability effects and that the proposed sites overall deliver positive benefits in sustainability terms against the relevant sustainability objectives. Some negative impacts were identified for certain sites against particular indicators, but the overall balance of positive versus negative impacts for all of the included sites is considered to be appropriate and justifies their inclusion.

### **2.3 The difference the process made**

The process has helped to confirm that there is a positive sustainability impact overall from the decision to allocate sites for development as opposed to a reactive 'do-nothing' approach to the development of key sites in the Borough. It has also helped to confirm that the sites themselves represent sustainable options and has informed how they should be developed with regard to their environmental, social and economic impacts. The SA is not the only factor in site selection and a number of other factors have also been used to decide on sites, but it is a helpful tool in establishing whether the allocation of sites will foster sustainable development.

In addition, the establishment of a suite of sustainability indicators will enable the combined environmental, social and economic impact of the Core Strategy and the associated allocated sites to be monitored and appropriate remedial action taken through the Annual Monitoring Report.

### **2.4 How to comment on this report**

The consultation on the Sustainability Appraisal Report will be in accordance with the following regulations and also Camden's Statement of Community Involvement:

- Article 5 (4) of the European Union Directive 2001/42/EC
- The Environmental Assessment of Plans and Programmes Regulations 2004
- Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.

The Sustainability Appraisal Report will be sent to the statutory Consultation Bodies with environmental responsibilities:

- English Heritage
- Environment Agency
- Natural England

The Sustainability Appraisal Report will be out for consultation for a six week period during November and December 2010.

Comments should be sent to:

**Address:**     **Urban Design and Renewal  
Site Development Team**  
FREEPOST NAT15037  
London Borough of Camden  
Town Hall Extension  
Argyle Street  
London            WC1H 8BR

**Email:**        [planning.sites@camden.gov.uk](mailto:planning.sites@camden.gov.uk)

## 3 Background

### 3.1 Requirement for Sustainability Appraisal

It is a requirement<sup>1</sup> that local authorities contribute to the objective of sustainable development in preparing Local Development Frameworks and that they carry out an appraisal of the sustainability of all Development Plan Documents and prepare a report summarising the findings of the appraisal. Further advice is contained within Planning Policy Statements PPS1 and PPS12. More detailed guidance for their production was also set out in “*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*” (ODPM 2005). This has recently been superseded by guidance contained in CLG’s *Plan Making Manual*.

In addition, European Directive 2001/42/EC requires formal Strategic Environmental Assessment (SEA) of certain plans and programmes which are likely to have significant effects on the environment. This has been enacted in the UK by a separate piece of legislation: the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

SEA concentrates on environmental aspects of a plan, whilst SA is broader covering the environmental as well as social and economic considerations. Although both processes derive from distinct legal requirements they have a high degree of overlap and the Government’s guidance suggests that they be carried out jointly in the form of an SA.

This SA report has therefore been drafted to incorporate the requirements of SEA within the wider appraisal of the social, economic and environmental sustainability impacts of the Site Allocations Preferred Approach.

### 3.2 Content of the Site Allocations Document

The purpose of the Site Allocations document is to identify the key development sites in the Borough on which proposals are likely to come forward during the plan period and to allocate these sites for preferred uses or a preferred mix of uses to assist the delivery of Core Strategy objectives. It is also intended to identify site-specific issues, opportunities and constraints and provide guidance as to how these should be addressed in future development proposals.

In terms of purpose, the document has two key objectives:

- To assist delivery of priorities and objectives of the Core Strategy and London Plan.
- Set a preferred mix of uses for a specific site and specific policy requirements to address site-specific issues.

The Site Allocations document sets out the relationship with other documents and strategies and summarises Camden’s key spatial objectives which aim to achieve the vision of Camden’s Community Strategy (Camden Together) and are articulated through the Core Strategy and

The Core Strategy sets out the Council’s overall strategy in relation to growth, where it happens and how it is managed and aims to do this by

- Promoting specific areas for development and growth
- Making the best use of limited land
- Supporting the role of the Central London area as part of a vibrant city
- Making housing the priority land use of the LDF
- Promoting higher development standards to tackle climate change

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<sup>1</sup> Section 39 of the Planning and Compulsory Purchase Act 2004

- Promoting sustainable transport
- Promoting high quality places and excellence in design
- Improving and protecting parks and open spaces
- Ensuring the provision of facilities and services to meet identified needs
- Improve health and well-being
- Making Camden a safer place
- Promoting access to facilities and opportunities
- Protecting the amenity of residents, workers and visitors
- Securing a strong economy including support for a diverse and beneficial range of economic uses
- Supporting town centres
- Identifying infrastructure needs and programmes

It is the role of the Site Allocations DPD to translate this strategic approach to the site level and to ensure that the nature of the sites identified, their location and the preferred development approach contribute to this strategy.

## 4 The Appraisal Process

### 4.1 Introduction

The role of the Site Allocations DPD is to translate the spatial objectives of the Core Strategy to the site level and for this reason this SA of the Preferred Approach has not been approached as a stand-alone assessment. Instead it builds on the work undertaken on the Core Strategy and its Sustainability Appraisal. It examines whether the approach taken and the sites identified will deliver the objectives of the Core Strategy which themselves were subject of detailed appraisal of their sustainability impacts and were amended through the process to ensure that the positive impacts were maximised. This Report takes the approach that if the Site Allocations have a positive impact on the achievement of Core Strategy objectives in relation to sustainability and the management of growth, then it follows that the sustainability impacts of this document will be positive.

### 4.2 Developing the Objectives of the Site Allocations DPD

In preparing the Site Allocations DPD it is important to acknowledge the objectives that were developed for the Core Strategy as these themselves were subject of SA. These objectives were tested through the SA of the Core Strategy against the sustainability objectives which were developed to cover the full range of potential environmental, economic and social outcomes. This enabled the sustainability effects and performance of the document to be described, analysed and compared.

Initially a series of objectives were developed for the Core Strategy to guide the delivery of the Community Strategy Vision. These objectives are as follows, and are arranged according to the vision's themes:

#### *A sustainable Camden that adapts to a growing population*

- to manage growth in Camden so that it meets our needs for homes, jobs and services, is supported by necessary infrastructure and maximises the benefits for the local area and community and the borough as a whole.
- to promote high quality, sustainable design and physical works to improve our places and streets and preserve the unique character of Camden and the distinctiveness of our valued places.
- to make sure that development in Camden achieves higher environmental standards.
- to provide homes to meet housing needs as far as possible in terms of affordability, the type of properties built and the mix of sizes.
- to better plan for and manage our waste, including through working with our partner boroughs in the North London Waste Authority.
- to improve and protect Camden's parks and open spaces and promote the diversity of plant and animal species in the borough.

#### *A strong Camden economy which includes everyone*

- to strengthen Camden's nationally-important economy while seeking to reduce inequalities within the borough, with jobs, skills, training and education opportunities available to everyone.
- to support the success of Camden's town and neighbourhood centres while adapting to changes in the economy and shopping habits.

#### *A connected Camden community where people lead active, healthy lives*

- to promote the high levels of amenity and quality of life that make Camden such a popular place to live.
- to secure mixed, balanced areas with a sense of community, avoid polarisation in the borough and promote equality of opportunity.
- to support improvements to the health and wellbeing of Camden's population.
- to reduce congestion and pollution in the borough by encouraging more walking and cycling and less motor traffic.

*A safe Camden that is a vibrant part of our world city*

- to support Camden's valuable contribution to London's regional, national and international role and make sure that this brings benefits to the borough and its residents.
- to promote the safety and security of those who live in, work in and visit Camden, while maintaining the borough's vibrancy.

Appraisal of these draft strategic objectives found they were generally successful in seeking to achieve sustainable development from the social, environmental and economic perspective. They were found to cover all the necessary elements of sustainability and contribute positively towards achieving this without any significant conflicts between the DPD objectives and the sustainability framework or any internal conflicts between DPD objectives. It was noted that there would be some instances where care will need to be taken to ensure that one objective does not outweigh or preclude achievement of another objective but this was considered to be a reasonable part of the balancing act required to meet a range of aims within one document.

The strategic objectives will have considerable positive **social** impacts. There are several objectives that aim to address key social issues including affordable housing, health, education and employment opportunities and avoiding polarisation throughout the borough. In addition to these direct positive impacts, there are a number of objectives that will indirectly affect social elements of sustainable development by seeking to improve and protect open spaces and to promote high quality sustainable design and improvements to places and streets will enhance the local environment, thereby helping to improve people's health and quality of life.

From an **environmental** perspective these objectives promote high quality design and works to improve our streets and conserve distinctiveness which will have major positive environmental effects. It will ensure future development enhances the environment and also help to improve on past developments. This drive is further strengthened by the draft objective promoting development that meets higher environmental standards. The appraisal highlighted the potential for conflict between promoting higher environmental standards and protecting local historic character, but this need not pose a problem provided that care is taken to find a balance. Similarly, the appraisal identified the importance of balancing the objective of higher environmental standards with maintaining the economic viability of development. The objectives also support the success of Camden's centres, and seek to concentrate new retail development in existing centres, reducing out-of-centre retail developments and reliance on motor vehicles, a major cause of environmental harm in Camden.

In addition it was found that there are several objectives that will specifically contribute to achieving **economic** sustainability under the theme of '*a strong Camden economy that includes everyone*'. This includes reducing inequalities and promoting availability of jobs, skills, training and education opportunities which will

have a valuable direct effect on tackling poverty and promoting sustainable economic growth. The objective that seeks to support the success of the borough's town and neighbourhood centres while adapting to change will also contribute positively to creating a sustainable economy by improving the viability of centres and strengthening their resilience to future market changes. In addition, the objective that seeks to provide housing that meets people's needs in terms of affordability will help to reduce poverty and economic exclusion by enabling more people access to the borough's housing. The objective that seeks to reduce congestion and encourage less motor traffic will help to reduce time wasted in congestion and improving the efficient movement of goods and people, both of which are important to the economic viability of businesses.

Overall it was considered that the draft strategic objectives were successful in seeking to achieve sustainable development, although a number of potential issues arising from the draft objectives were identified as well as recommendations for improving certain objectives to either strengthen their positive impacts or mitigate potential negative ones. Refinements and amendments to the objectives were then made to address in line with these recommendations. Copies of the assessment tables in relation to these objectives are attached to this report at Appendix B.

Given the Role of the Site Allocations DPD Is to implement the objectives of the Core Strategy, a two stage process has been followed in assessing this document. Firstly, the Site Allocations approach has been tested against these objectives and then each of the individual sites has been assessed against the same sustainability objectives that were developed for the Core Strategy.

### Sustainability Appraisal objectives and criteria

The set of 16 key SA objectives, were developed through the Scoping Report and subsequently used in the SA of the Core Strategy. These have been used in the appraisal of the Site Allocations DPD to ensure consistency of approach with the Core Strategy Appraisal. Each objective is supported by a number of criteria to assist assessment as to the potential impacts, as shown in the table below. Amendments to the criteria are shown in underlined text and were made as a result of consultation on the Sustainability Scoping Report.

No.	Objective	Criteria
1	To promote the provision of a range of high quality and affordable housing to meet local needs	a) Will the option increase the supply of housing b) Will the option protect and promote affordable housing c) Will the option provide housing for people, particularly families, on moderate <u>and lower</u> incomes? d) Will the option encourage development at an appropriate density, standard, size and mix? e) Will option <u>increase the</u> opportunity to live in a decent home?
2	To promote a healthy and safe community	a) Will the option <u>encourage</u> improved provision of healthcare facilities? b) Will the option promote healthy living through e.g. provision of walking, cycling and recreation facilities? c) Will the option help to <u>promote safety and</u> reduce levels of crime and fear of crime concerns?

No.	Objective	Criteria
3	To ensure access to local shopping, community, leisure facilities and open space	<ul style="list-style-type: none"> <li>a) Will the option encourage mixed-use development?</li> <li>b) Will the option encourage the retention and development of key services (<a href="#">e.g. shopping, community and leisure facilities</a>)?</li> <li>c) Will the option encourage the location of services in proximity to public transport <a href="#">or increase access to services by public transport</a>?</li> <li>d) Will the option help to <a href="#">protect</a>, increase or improve open space and access to it?</li> </ul>
4	To tackle poverty, social exclusion <a href="#">and promote equal opportunities</a>	<ul style="list-style-type: none"> <li>a) Will the option encourage development that facilitates social cohesion <a href="#">and be beneficial to disadvantaged groups</a>?</li> <li>b) Will the option provide for equality of access for all to buildings and services?</li> <li>c) Will the option encourage development opportunities in those areas in need of economic development?</li> </ul>
5	To encourage and accommodate sustainable economic growth and employment opportunities	<ul style="list-style-type: none"> <li>a) Will the option encourage the retention and growth of existing, locally based industries?</li> <li>b) Will the option accommodate new and expanding businesses?</li> <li>c) Will the option encourage new investment in the local economy and promote development opportunities for employment?</li> <li>d) will the option promote successful centres for shopping and services?</li> </ul>
6	To maximise the benefits of regeneration and development to promote sustainable communities	<ul style="list-style-type: none"> <li>a) Will the option encourage sustainable inward investment that will promote social well-being and benefit the economy?</li> <li>b) Will the option promote access to employment opportunities for local people?</li> <li>c) Will the option provide for adequate education facilities, including life long learning?</li> </ul>
7	To promote high quality and sustainable urban design which protects and enhances the historic environment	<ul style="list-style-type: none"> <li>a) Will the option provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape?</li> <li>b) Will the option ensure enhancement of the public realm and local distinctiveness?</li> <li>c) Will the option ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value?</li> <li>d) Will the option encourage the use of sustainable design and construction?</li> </ul>
8	To ensure new development makes efficient use of land, buildings and infrastructure	<ul style="list-style-type: none"> <li>a) Will the option encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</li> <li>b) Will the option ensure efficient use of land through maximising densities where appropriate?</li> </ul>

No.	Objective	Criteria
9	To reduce reliance on <a href="#">private</a> motorised transport	<ul style="list-style-type: none"> <li>a) Will the option encourage development at locations that enable, and infrastructure for, walking, cycling and/or the use of public transport?</li> <li>b) Will the option encourage access for all to public transport?</li> <li>c) Will the option encourage the transportation of freight by means other than road?</li> <li>d) Will the option encourage car free / car-capped housing?</li> </ul>
10	To improve amenity by minimising the impacts associated with noise	<ul style="list-style-type: none"> <li>a) Will the option ensure that noise from existing and new developments and operations will not affect new or existing noise sensitive development or land uses?</li> <li>b) Will the option ensure new noise sensitive uses are not located near existing established noise generating uses?</li> </ul>
11	To protect and manage water resources and reduce flood risk	<ul style="list-style-type: none"> <li>a) Will the option promote the sustainable use of water resources?</li> <li>b) Will the option encourage development that incorporates sustainable drainage?</li> <li>c) Does the option take into account potential flood risk in Camden?</li> <li>d) Will the option promote the protection and enhancement of the quality of Camden's waterways?</li> </ul>
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	<ul style="list-style-type: none"> <li>a) Will the option protect and enhance natural habitats in the borough, particularly those of priority species (includes terrestrial and aquatic)?</li> <li>b) Will the option provide for the protection of biodiversity and open space in the borough?</li> <li>c) Will the option encourage the creation of new habitats, including through the provision of additional open space and green roofs?</li> <li>d) Will the option protect and provide for the planting of more trees in the borough?</li> </ul>
13	To reduce the amount of waste requiring final disposal	<ul style="list-style-type: none"> <li>a) Will the option ensure reduction of waste during the development process and/or operation?</li> <li>b) Does the option encourage the movement of waste up the hierarchy?</li> <li>c) Does the option provide for the future demand for waste management</li> </ul>
14	To improve air quality	<ul style="list-style-type: none"> <li>a) Will the option reduce CO<sub>2</sub> and other greenhouse gas concentrations in the atmosphere?</li> <li>b) Will the option reduce the discharge of particulate matter to the atmosphere?</li> <li>c) Will the option contribute to an improvement of air quality?</li> </ul>
15	To provide for the efficient use of energy.	<ul style="list-style-type: none"> <li>a) Will the option facilitate the installation of renewable energy facilities?</li> <li>b) Will the option encourage energy efficiency?</li> <li>c) Will the option help tackle fuel poverty?</li> </ul>

No.	Objective	Criteria
16	To minimise the use of non-renewable resources	a) Will the option encourage the re-use of resources? b) Will the option encourage a more efficient supply of resources?

In order to attribute likely impacts against these objectives a matrix has been developed that included the objectives and columns for carrying out the appraisal. This matrix is consistent with the approach use in the SA of the Core Strategy and Development Policies. Within the matrix, the effects on the issues are depicted by symbols (see table A below), and a commentary is provided to state the reasoning behind the appraisal and to identify any relevant mitigation measures that may be available.

**Table A**

↑↑	Likely large positive impact
↑	Likely positive impact
↑↓	Likely positive and negative impacts
-	Uncertain impact or no relationship
↓	Likely negative impact
↓↓	Likely large negative impact
?	Assumed impact based upon interpretation of option

#### 4.4 The Appraisal

Government Guidance on the preparation of SAs requires that alternatives and options should be examined in plan making and that a hierarchy of options be explored.

In relation to the Site Allocations DPD, there are two clear tiers of alternatives to be tested, the first being the principle of whether to allocate sites which is essentially a reactive versus proactive approach to the location of new development and the second is the site level and whether each of the individual sites, if allocated, will support the sustainability objectives mentioned in the previous section.

##### Whether to allocate:

At the higher level, the neutral or 'do-nothing' reactive approach has been tested against the allocation or 'plan' proactive approach in terms of the sustainability objectives. In this assessment, the neutral approach is taken as having a neutral impact. It is of course acknowledged that development proposals would still be assessed against relevant policies, including the London Plan, Core Strategy and Development Policies, all of which have been through SA and found to have generally positive impact. However, these policies are already in place or being developed and the purpose of this assessment is therefore to look at any additional positive or negative impact which could be attributed to the allocations approach.

The findings of this assessment are presented in table 1 below:

<b>Table 1 – Assessment of the Site Allocations Approach</b>		
<b>Sustainability Objectives</b>	<b>Allocation Approach</b>	<b>Reasoning</b>
1. To promote the provision of a range of high quality and affordable housing to meet local needs	↑↑	There is a very strong emphasis in allocating sites for housing use to meet needs and targets.
2. To promote a healthy and safe community	↑	<p>Allocations seek to assist Health Service providers with their redevelopment and improvement plans.</p> <p>We seek to assist the MPA with their service improvement by streamlining our allocations with their asset management plan and proposals.</p> <p>Through allocations we also seek public realm, pedestrian access and natural surveillance solutions to design out crime in areas that have particular crimes issues.</p>
3. To ensure access to local shopping, community, leisure facilities and open space	↑	<p>Allocations seek encourage new housing in growth areas and highly accessible locations.</p> <p>Allocations seek development sites that are large enough or within open space deficiency areas to provide or contribute towards open space.</p>
4. To tackle poverty, social exclusion and promote equal opportunities	-	<p>Allocations indicate where employment uses will be supported.</p> <p>Allocations do seek affordable housing on housing sites to assist community integration.</p>
5. To encourage and accommodate sustainable economic growth and employment opportunities	↑↑	There is a very strong emphasis in allocating sites for employment use. This is particularly relevant in the Growth Areas such as Kings Cross Opportunity Area, Euston Station Opportunity Area, Tottenham Court Road Opportunity Area and Central London.
6. To maximise the benefits of regeneration and development to promote sustainable communities	↑↑	<p>Nearly all land developed in Camden is located on Brownfield land.</p> <p>Allocations on sites often seek benefits to the wider community including contribution to:</p> <ul style="list-style-type: none"> <li>- affordable housing</li> <li>- open space expansion and improvement</li> <li>- community facilities</li> <li>- public realm improvements</li> <li>- improvements to pedestrian access and routing</li> <li>- other specific improvements to local objectives</li> </ul>
7. To promote high quality and sustainable urban design which protects and enhances the historic	↑	Core Strategy and Development policies are very strong in this regard. Site Allocations also build on this approach by providing specific context to the development sites (including listed

environment		buildings, conservation areas and buildings of positive contribution.
8. To ensure new development makes efficient use of land, buildings and infrastructure	↑↑	Camden is an inner city London Borough and is mostly developed. Development opportunities are often by intensification of existing sites. Camden seeks to maximise efficient use of land, buildings and infrastructure with due regard to other policy objectives and physical limitations.
9. To reduce reliance on private motorised transport	↑	Site Allocations seeks to allocate sites for development within highly accessible locations. Core Strategy and Development Policies reinforces this position with car free development policies in area of high accessibility.  Allocations also seek pedestrian improvements to create a more attractive pedestrian environment.
10. To improve amenity by minimising the impacts associated with noise	-	Site Allocations acknowledge areas associated with noise for consideration with regard to development proposals. Noise attenuation measures are mostly dealt with by Development Policies.
11. To protect and manage water resources and reduce flood risk	↑	Camden is subject to occasional surface flooding. Sites that are located in these areas acknowledge this issue.  Development Policies often deal with attenuation measures such as levels, Sustainable Drainage Systems, on site detention etc.
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	-	Site allocations seek to protect/enhance and contribute to improve existing habitats where relevant e.g. Regents Canal, railway nature corridors where sites are in proximity.  Site allocations also seek contributions to open space to support biodiversity
13. To reduce the amount of waste requiring final disposal	-	This matter is primarily dealt with by the North London Joint Waste DPD and the Development Policies.
14. To improve air quality	↑↓	Development of sites will inevitably produce particulates from demolition and construction. Development Policies seek to minimise this via employing attenuation methods specified within individual construction management plans.  Site allocations seek to identify sites for development within growth areas (highly accessible locations) where car free policies will apply and reduce this source of emission.  In decentralising energy, Site allocations also seek local energy generation to be produced on some sites; this will inevitably produce local emissions.

15. To provide for the efficient use of energy.	↑	Site allocations seek local energy generation to be provided on some sites where obvious opportunities may exist.
16. To minimise the use of non-renewable resources	↑	Site allocations seek local energy generation to be provided on some sites where obvious opportunities may exist.  Site allocations seek to identify sites for development within growth areas (highly accessible locations) where car free policies will apply and reduce this source of emission.
<b>Social</b>	↑↑	<b>Site Allocations have a strong emphasis on providing housing including affordable housing. Allocations also focus on assisting delivery of future improvement and proposals to Health, Police and Education services.</b>
<b>Economic</b>	↑↑	<b>Site allocations have a strong emphasis in identifying and allocating sites for future employment growth. Allocations also seek to protect existing employment uses particularly where they are for light workshops which provide a good source for local employment.</b>
<b>Environment</b>	↑	<b>Site Allocations seeks to identify land for development within highly accessible location which will reduce dependence on private motor vehicles and reduce emissions. Site Allocations will seek provision of: open space; local energy generation. Site Allocations also seek improvement to public realm.</b>

The results of this assessment indicate that there are a number of additional positive impacts in relation to the sustainability objectives from choosing to allocate sites. In the absence of a Site Allocations document development proposals on individual sites would be assessed against the relevant policy framework which has been designed to foster sustainable development. The Site Allocations provides an additional level benefit in that can be proactive in identifying opportunities based on site context and involving local communities. In addition, by engaging with landowners and developers, the Site Allocations can also assist delivery by proactively setting up an approach to site development in the early stages.

Site Selection:

A range of sites have been considered in preparing the preferred options for the Site Allocations DPD. These include sites suggested in the initial Issues and Options paper which was published for consultation in October 2008.

There are a number of site selection criteria that have been used to decide whether sites should be included. These include size, likely deliverability, existing protected uses and environmental constraints.

Major sites considered for allocation and inclusion in the document will generally be above 0.1 hectare. Other sites may be important locally, but the document needs to focus on those most likely to make a contribution to the objectives of the Core Strategy, and new development policies will be sufficient to guide future planning decisions on other sites.

In order to fulfil the objectives of the Core Strategy site allocations must also be available, realistic and with reasonable prospects of success.

In some cases, sites promoted for development by developers and land owners may not be included. Reasons for this can vary, but usually involve the site being constrained in the absence of detailed evidence and assessment; such as the form, detail and assessment required at a planning application level. Examples of such constraints might include: historic setting (e.g. listed buildings, conservation area and buildings of positive contribution); open space designations; existing uses that are protected by policy; strategic viewing corridors; limited site capacity within reasonable expectations.

However, because a site is not included in this document it does not imply that they are unimportant. The future availability and development of other sites will still be expected to meet the objectives and priorities of the LDF and its policies and requirements.

The table below illustrates the assessment of Sites against Sustainability objectives. The sites within this table are those that have been included within the Site Allocations Preferred Approach document. In addition, we have also examined a number of suggested development sites that were not included within the Site Allocations Preferred Approach document whose exclusion would also be reinforced on sustainability grounds, these are set out in Table 3 below.

The individual sites have been assessed with regard to:

- Sustainability appraisal assessment criteria set out in section 4.3 of this report;
- Comments set out in Table 1 – Assessment of the Site Allocations Approach;
- Planning designations and other constraints by site, and
- Information sources contained within the Sustainability Appraisal Scoping Report.

A commentary on the assessment of the sites follows Table 2 below.

<b>Table 2</b>		Housing	Health and Safety	Access to facilities	Equality	Economic Growth	Benefits of Regeneration	Design and historic environment	Land	Private transport	Noise	Drainage and Flooding	Biodiversity	Waste	Air quality	Energy	Use of non-renewable resources
Site No.	Site Description	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
1	<b>1. St Giles Circus</b>	++	++	++	+	++	++	++	++	++	+	+	0	+	+	++	++
2	<b>2. Kentish Town Police Station, 10A,12A, 14 Holmes Road</b>	+	+	+	+	++	++	++	++	+	+	+	+	+	+	++	++
3	<b>3. Bangor Wharf, Georgiana Street</b>	+	+	+	+	++	++	++	++	+	+	+	+	+	+	++	++
4	<b>4. 57 - 71 Pratt Street, 10 - 15 Georgiana Street And Royal College Street</b>	+	+	+	+	++	++	++	++	+	+	+	+	+	+	++	++
5	<b>5. 24 - 58 Royal College Street</b>	++	+	+	+	++	++	++	++	+	+	+	+	+	+	++	++
6	<b>6. 26 Gordon Square and 15 Gordon Street</b>	0	+	+	+	+	++	++	++	+	+	+	0	+	+	++	++
7	<b>7. 20-22 Gordon Street</b>	0	+	++	+	+	++	++	++	+	+	+	0	+	+	++	++
8	<b>8. 20 Highgate Road</b>	+	+	++	+	+	++	++	++	+	+	+	+	+	+	++	++
9	<b>9. Regent's Park Centre, Longford Street</b>	+	+	++	+	+	++	++	++	+	+	+	0	+	+	++	++
10	<b>10. Augustus Street (including depot and Goldsmith House)- to be added</b>	++	+	++	+	+	++	++	++	+	+	+	+	+	+	++	++
<b>++ Likely large positive impact</b> <b>+ Likely positive impact</b> <b>0 Uncertain impact or no relationship</b> <b>- Likely negative impact</b> <b>-- Likely large negative impact</b>																	