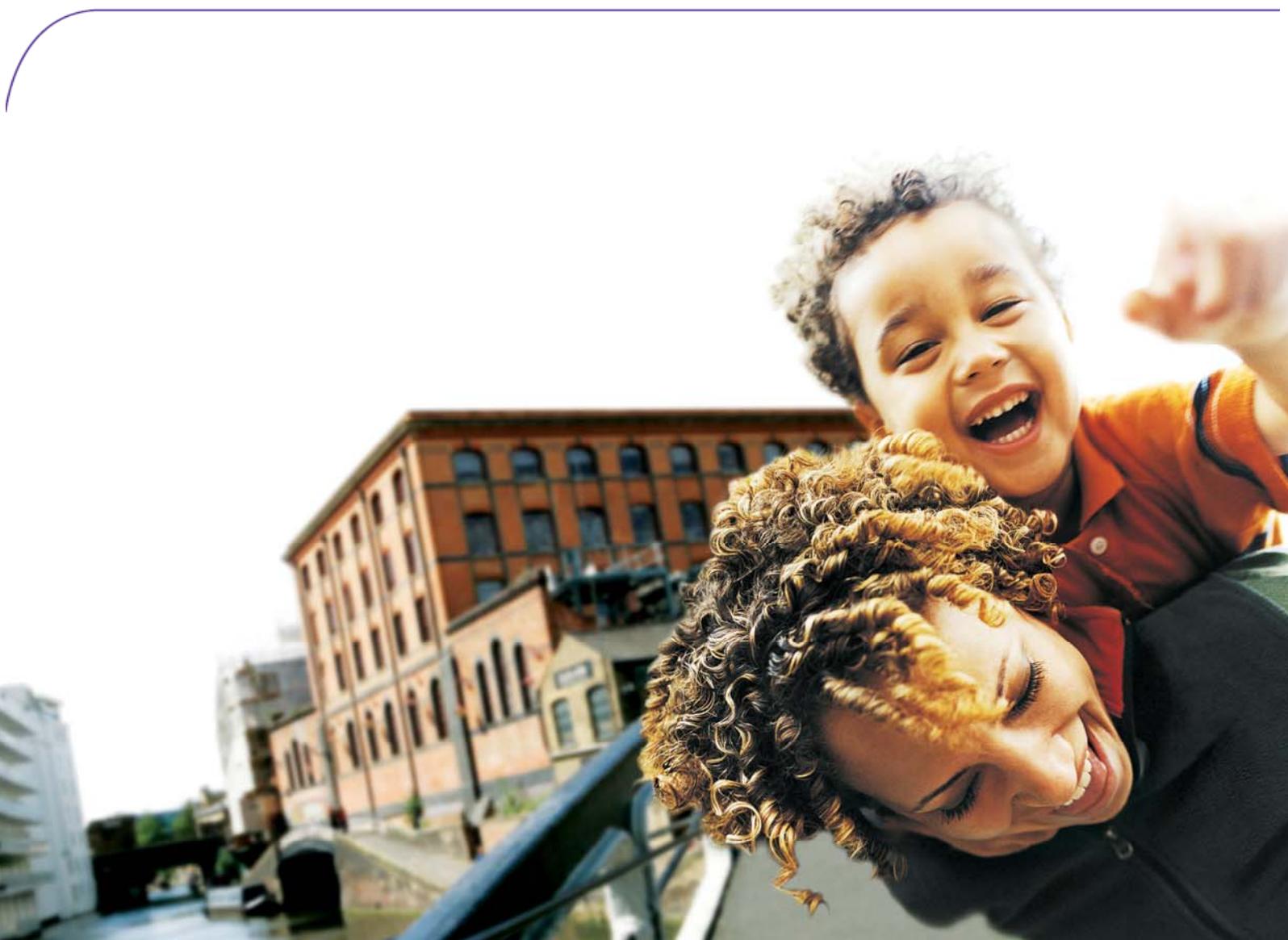


Camden Site Allocations

Local Development Framework

Sustainability Appraisal of the Proposed Submission
document

March 2012



Camden Local Development Framework

Site allocations

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1. Non-Technical Summary

1.1 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.

This sustainability appraisal has been carried out within the context of Camden's adopted Core Strategy and Development policies, which themselves were subject to sustainability appraisal.

1.2 Overall outcome of Sustainability Appraisal

The SA process has found that the overall Site Allocations document will deliver positive sustainability effects and that the proposed sites overall deliver positive outcomes 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. Where appropriate, the SA report sets out mitigation measures to address any adverse impacts

1.3 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. Introduction

2.1 Context

The Site Allocations DPD sets 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 adopted Camden Core Strategy and the London Plan.

This document is the Sustainability Appraisal (SA) Report on Camden's Site Allocations Proposed submission document, and has been prepared for publication in March 2012. The purpose of the SA is to promote sustainable development through the integration of social, economic and environmental considerations into the preparation of new or revised local development documents. The document has been prepared in line with the Strategic Environmental Assessment (SEA) Regulations, which require both SA and SEA to be carried out as part of the preparation of all local development documents.

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.

2.2 Purpose

This document seeks to determine how the Site Allocations draft submission 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 were both adopted in November 2010. The earlier development of the Core Strategy and the Development Policies including their respective sustainability appraisals has provided a framework in which the Site Allocations can progress. Consequently, the Site Allocations document should 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.

2.3 Preparation of the Sustainability Appraisal

The Site Allocations Preferred Approach document follows the earlier preparation of and consultation on the site Allocations Preferred Approach (and Preferred Approach additional site consultation), and also the Site Allocations Issues and Options paper. The Preferred Approach document and Additional sites consultation documents were both the subject of Sustainability Appraisal. Prior to this, the Issues and Options paper was 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.

The Site Allocations Preferred Approach sustainability appraisal (and sustainability appraisal of additional sites) provided an appraisal of the potential impacts of the draft site allocations. The framework for assessing these impacts was established by the SA Scoping Report.

This SA report builds on the work done on the Sustainability Appraisals of the Core Strategy and Development Policies, which have now been adopted, and brings together sustainability appraisal work carried out in the main Preferred Approach consultation and the subsequent Additional Sites consultation. 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 Core Strategy and Development Policies 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.

3. Background

3.1 Requirement for Sustainability Appraisal

It is a requirement¹ 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. For the purposes of clarity, Appendix A includes a table setting out where specific SEA requirements are addressed in this report.

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 Site Allocations 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

¹ Section 39 of the Planning and Compulsory Purchase Act 2004

- Promoting higher development standards to tackle climate change
- Promoting sustainable transport
- Promoting high quality places and excellence in design and preserving and enhancing Camden's heritage assets and other valued places
- 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. Baseline characteristics

This section briefly outlines the major characteristics of the London Borough of Camden. More detailed information on the borough profile can be found in the most recent Annual Monitoring Report and in the SA Scoping Report.

What makes Camden unique?

The profile below describes some of the features that give the borough its unique character.

Camden's places

- Camden covers approximately 22 square kilometres (11 square miles) in inner London;
- the southern part of the borough forms part of Central London with its dynamic mix of uses, activities and facilities of London-wide, national and international significance. It is also home to a significant resident population;
- Camden has many residential areas and neighbourhoods with their own distinctive characteristics, many of which are of architectural or historic importance (Index of Multiple Deprivation 2007; CLG);
- Camden has numerous parks and open spaces, ranging from Hampstead Heath, Primrose Hill and the Regents Canal to historic squares and local parks and playgrounds;
- the borough has a range of centres providing shopping and services and local employment. These include town centres such as Camden Town, West Hampstead and Finchley Road, areas that contribute to the retail attraction of the West End like Tottenham Court Road and Seven Dials, and a variety of neighbourhood centres, street markets and local shops;
- Camden is home to many renowned institutions such as the British Museum, the British Library, the Inns of Court, the University of London and other educational establishments and teaching hospitals;
- Camden is a borough of diversity and contrasts. It contains wide inequalities in household income, health and other characteristics and every part of the borough has areas of relative affluence alongside areas of relative poverty. Camden is one of the most polarised boroughs in London with some of the wealthiest areas in England as well as some of the most deprived.

Camden's people

- almost 210,000 people currently live in the borough and it is estimated that Camden's population will grow by 18% between 2006 and 2026 (GLA 2006 Round-based Population Projections - RLP High);
- the increase in population will largely be due to more births and fewer deaths in future years, although migration will also play a part (GLA 2006 Round-based Population Projections - RLP High);
- our population is ethnically diverse, with around 30% of residents from black or minority ethnic groups (compared to the England average of 9%) (GLA 2006 Round-based Ethnic Group Projections - RLP High);
- Camden has a relatively young population, concentrated in the working ages, with relatively few children and older people and with the highest proportion of full-time students in London (GLA 2006 Round-based Population Projections - RLP High / Census, 2001);
- almost half of Camden residents have qualifications of at least degree level while a quarter have few, if any, qualifications and many lack basic skills in literacy and numeracy (Census, 2001);
- overall recorded crime levels have been falling in recent years but are still above the average for London (Metropolitan Police Crime Statistics, 2006/7).

Camden's economy

- although Camden is a small borough in terms of size, it is the third largest contributor to London's economy and provides around 1% of Britain's economy (Annual Business Inquiry; Office of National Statistics; 2007);

- Camden has over 24,000 businesses, ranging from international organisations to small businesses, and it is estimated that over a quarter of a million people work in the borough (ONS Total Jobs Estimate, 2006 / ONS Business Demography - active businesses 2007);
- over half of the businesses in Camden are in 'knowledge economy' industries such as the media, finance, law and other professional services. Leisure, entertainment and tourism are also important for the borough's economy, with particular concentrations in Central London and Camden Town (Annual Business Inquiry, Office of National Statistics, 2007)

Camden's homes

- Camden is a very popular place to live but this means that the average house price in the borough is the third highest in London (Land Registry House Price Index, 2008);
- demand for affordable housing far outstrips supply and continues to increase;
- Camden has a small average household size (2.06 persons per household) compared to England and Wales as a whole (2.36) and the number of single person households is growing among both younger and older people (Census, 2001);
- up to a third of Camden's households are overcrowded, so there is also a high demand for larger properties, particularly for social housing (Census 2001);
- Camden has a high proportion of flats and a high proportion of people live in rented accommodation (Census 2001 / Camden Housing Investment Programme 2007).

Camden's environment

- Camden has a unique architectural heritage, with many high quality areas and thousands of buildings recognised for their special architectural or historic interest;
- Camden collects over 112,000 tonnes of waste each year ("municipal waste"), which includes around 56,000 tonnes of waste from households (Best Value Indicators 82 (a) and (b) LB Camden, 2006/7);
- recycling in the borough is increasing with over 25% of household waste now being recycled (Best Value Indicators 82 (a) and (b) LB Camden, 2006/7);
- parts of Camden have some of the poorest air quality levels in London (Camden Air Quality Action Plan Progress Report 2007).

Camden's transport

- the number of people cycling in Camden increased dramatically over the last decade, while walking accounts for nearly half of the journeys taken by Camden residents, almost twice the national average (Census 2001);
- 56% of Camden households have no access to a car or van (Census 2001);
- the borough has extensive coverage by bus, tube and suburban rail;
- Camden also has three major mainline railway stations (King's Cross, Euston and St Pancras) and a gateway to/from mainland Europe in the Eurostar terminal at St Pancras.

Camden's setting

Camden does not sit in isolation. Therefore, when we are developing our strategy for the borough it is important for us to take account Camden's relationship with neighbouring boroughs, other parts of London and wider areas linked to us by transport routes. Some of the key relationships and links are described below:

- the southern part of the borough is within London's Central Activities Zone (CAZ), the area that contains many of the activities that define London's role as the UK's capital and a major international city, and the south-west corner of Camden forms the eastern edge of the West End;
- some of Camden's growth areas are on our border, or straddle our boundary, with other boroughs. For example, King's Cross sits on the border between Camden and Islington and the Tottenham Court Road area extends across parts of Camden and Westminster;
- there are major redevelopment proposals for the Cricklewood/Brent Cross area, north west of Camden, involving over 7,000 homes and a substantial amount of new shops and offices;
- Camden is at the southern end of the North-West London to Luton corridor which is planned to experience substantial levels of growth alongside future transport improvements;

- Kilburn town centre straddles the border of Camden and Brent.

Camden's culture

- Camden is a thriving location for culture and the arts. It is the home to many of the UK's leading cultural institutions, such as the British Museum and the British Library, and many smaller museums and institutions, ranging from Kenwood House to the Foundling Museum and the Freud and Dickens Museums.
- The borough is home to numerous theatres and, in the southern part of the borough, part of London's renowned 'Theatreland'.
- There are many mid and small-scale creative organisations operating in the borough, such as Camden Arts Centre and the Roundhouse.
- Camden is also famous for its music venues, including Koko, the Roundhouse, the Forum and many smaller venues, notably in and around Camden Town.

Camden's mix and variety

Other local authority areas will share some of the features outlined above but what really makes Camden unique is the combination of these characteristics and issues. Camden is a largely residential borough with many historic places but it is also a key part of a world city, a major contributor to London's economy and a focus of culture, entertainment and education. These elements give Camden its unique character but also bring a number of challenges.

The challenges we face

Camden's planning strategy is being prepared in the context of social, economic and environmental changes. Some of the key issues that we need to consider are outlined below. The table also provides a brief assessment of the likely evolution of the current state of the environment without the implementation of the Core Strategy and Development Policies documents.

Issue	Summary and Source of Evidence
Environmental	
Protecting and enhance the historic environment	<p>There are 39 conservation areas, 5645 listed buildings, 13 Archaeological Priority Zones and 1 Scheduled Ancient Monument in Camden (<i>LBC Conservation and Design Team</i>). There are also many heritage assets in adjoining boroughs, some of which can be affected by development in Camden, as well as those which are split between Camden and another borough, such as Regent's Park.</p> <p>Without the site allocations opportunities may be missed to enhance the setting of the historic environment through the redevelopment of major under-used and poor quality sites and buildings that currently detract from existing heritage assets.</p>
Promoting energy efficiency and renewable energy.	There is a nationally recognised need to increase the energy efficiency of new and existing buildings and install more renewable energy facilities on new and existing buildings (<i>Energy White Paper, PPS22</i>).
	Where appropriate site allocations seek to ensure that developments contribute to local energy generation, including through on-site provision, thus promoting more efficient energy generation. Without this strategic guidance in the Site allocations, opportunities to deliver local energy generation on particular sites may be lost, although Core Strategy Policy CS13 can be used to seek local energy generation in new development.

Issue	Summary and Source of Evidence
<p>Significant travel-demand generating uses, including new housing, need to be located in areas with high public transport accessibility and local services.</p>	<p>In 2005/06, 10% of significant travel demand generating developments permitted in the borough fell outside the designated buffer area, meaning that these developments were not necessarily located in the most accessible locations (<i>AMR 2005/06</i>). <i>PPG13</i> sets out the requirements for sustainable transport that the DPDs must incorporate.</p>
	<p>The site allocations guide development towards more accessible areas and promote mixed use development where appropriate, in order to reduce the need to travel and promote sustainable travel. However, it should be noted that even without the Site allocations, Core Strategy policy CS1 can be used to focus development towards highly accessible areas and to promote mixed use development.</p>
<p>There is a deficiency of open space in terms of accessibility of high quality usable open spaces and parks.</p>	<p>The areas of greatest deficiency are in the following parts of the borough: Central London East; SE and NW of Hampstead and Highgate; Kentish Town area; east of Regent's Park area; and SW of Somers Town area (<i>Open Spaces Needs Assessment Report</i>). However, given that 100% of new development in the borough occurs on previously developed land and the fact that there is a significant shortage of available land for development and therefore limited scope for creating new open space</p>
	<p>Site allocations promote provision of on-site open space where appropriate: such opportunities may be lost without the site allocations, although policies CS15 and DP31 can be used to ensure that new development provides improvements to open space provision where appropriate..</p>
<p>Need to effectively recycle and manage waste.</p>	<p>Population of the borough will increase considerably over the next ten years, increasing the need for our waste to be sustainably managed. <i>Camden's Waste Strategy</i> highlights the importance of this, as does <i>PPS10</i>.</p>
	<p>Policies on provision for waste and recycling in development sites are dealt with in the Core strategy and Development Policies.</p>
<p>Air quality in Camden is poor and does not meet the air quality standards for nitrogen dioxide and particulate matter.</p>	<p>Current levels of NO₂ and PM₁₀ in Camden do not meet health-based standards (<i>Camden's Air Quality Action Plan</i>). The <i>National Air Quality Action Plan</i>, which sets the national standards, also states that land use plans can have a direct impact on air quality. The planning system has an important influence on air quality, (<i>PPS23 – Planning and Pollution Control</i> and <i>Camden Air Quality Action Plan</i>). Ensuring that future developments do not have a significant impact on air quality in Camden is important, making sure that exposure to poor air quality is minimised at new development sites.</p> <p>The key areas linking planning and air quality are road transport, energy generation and the operation of certain industrial processes. Each serves as a source of pollution emissions and can be mitigated through the regulation of industrial process (<i>Pollution Prevention and Control Regulations 2000</i>) implementation of sustainable transport measures (<i>PPG13, Camden Green Transport Plan</i>), promotion of energy efficiency (<i>BREEAM/EcoHomes</i>) and renewable energy sources (<i>PPS22</i>); see also <i>Camden's Air Quality Action Plan</i>.</p>

Issue	Summary and Source of Evidence
	<p>Site allocations guide development towards accessible area in order to reduce the need for travel by the car. However, in the absence of the Site Allocations Core Strategy policy CS1 seeks to focus new development towards accessible areas, policy DP18 promotes car free development and policy DP32 <i>Clear Zone and air quality</i> sets out Camden's approach to addressing air quality issues in new development.</p>
<p>Encouraging new development on previously developed sites raises potential concern regarding contaminated land and could have biodiversity issues.</p>	<p>While no sites in the borough are currently designated as contaminated for the purposes of the Environment Act, numerous sites in the borough has been previously utilised for heavy industry and other polluting uses and this may pose contamination problems for future development on such sites, especially given the trend for building on previously developed land (<i>AMR 2005/06</i>). Further, many vacant sites have become havens for urban wildlife, in areas where very little other habitat exists.</p> <p>The Site Allocations would not impact on this issue since there are minimal heavy industrial sites in the borough and national guidance and environmental health regulations would deal with this issue.</p>
<p>Increases in the amount of built land can cause flooding problems in parts of Camden.</p>	<p>In 2002 widespread flooding occurred in the north of the borough. It has been determined that the topography of Hampstead and the nature of Summer thunderstorms make high rainfall and associated flooding likely (<i>State of the Environment Report 2005</i>). PPS25 recognises that local development documents should reflect strategic flood risk assessments (SFRAs).</p> <p>The allocated sites are not located in flood zones. In the absence of the Site allocations, Policy DP23 <i>Water</i>, sets out Camden's detailed approach to flooding and drainage issues.</p>
<p>There is a strong connection between traffic flows and ambient noise levels.</p>	<p>Studies undertaken on European Car-Free Day in 2002 have shown that ambient noise levels were significantly reduced, particularly on Great Russell Street and Woburn Square, which are important east-west links with high traffic flows normally (<i>European Car-Free Day 22/9/02 Results of noise monitoring in Bloomsbury</i>).</p> <p>In the absence of the Site allocations, the Core Strategy seeks to focus development in highly accessible areas. Camden's adopted policies seek car free development (CS11 and DP18) and promote public transport improvements will reduce the noise associated with traffic in the borough.</p>
<p>There should be no further decline in priority species and we need to seek ways to protect and enhance/increase their habitats.</p>	<p>There are five priority species identified within Camden's biodiversity Action Plan, being the bat, hedgehog, house sparrow, odanata (dragon flies and damsel flies) and stag beetle. There are some habitats under greater threat from development and it is noted that the Built Environment makes up 80% of Camden. (<i>Camden Biodiversity Action Plan, AMR 2005/06</i>). PPS9 on biodiversity highlights the potential for green and brown roofs and sustainable urban drainage systems for new and redeveloped buildings, thereby helping to increase biodiversity potential.</p> <p>The Site allocations are not located in notable habitat areas. In the absence of the Site allocations, adopted Core Strategy policy CS15 seeks to protect and promote biodiversity and habitat provision.</p>

Issue	Summary and Source of Evidence
Sustainable design and use of resources	<p>Two pollutants, nitrogen dioxide (NO₂) and fine particles (PM₁₀) are likely to exceed national objectives. (<i>Local Data</i>). The review of plans and programmes highlights a prevailing emphasis on improving design standards, building performance and energy efficiency (<i>ODPM/BREEAM/GLA</i>) (<i>PPS1, UK Sustainable Development Strategy</i>). Improvements in building design will promote energy conservation and efficiency resulting in reduced energy consumption. This will assist in reducing air pollution and carbon dioxide emissions from generating power for heating and electricity.</p>
	<p>Adopted policies CS13 <i>Tackling climate change through promoting higher environmental standards</i>, and DP22 <i>Promoting sustainable design and construction</i>, set out Camden's standards in relation to sustainable design.</p>
Social	
Meeting the needs of an growing population	<p>Camden's population is highly mobile, culturally and ethnically diverse. Projections from revised census estimates indicate high levels of growth and emphasise the comparative youthfulness of local population and large number of single person households (<i>Census/ONS</i>). Past trends built into household projections may not reflect the recent changes in Camden.</p>
	<p>In the absence of the site allocations, which set out specific locations that can contribute to meeting housing needs, Camden would be less able to direct and manage major development sites in a way to meet the priority given to housing in Core Strategy policy CS6. However, new development could be guided and assessed in a general sense under the policies in the Core Strategy and Development Policies.</p>
Meeting increased housing needs particularly provision of affording housing	<p>In 2005/06, 503 new dwellings were completed in Camden. During this same period, only 62 affordable dwellings were completed, 12% of the total number of completed dwellings. There were only four schemes completed out of 95 that were over the 15 dwellings threshold (<i>Camden AMR 2006</i>) and this may help to explain the low percentage of affordable housing. However, it also indicates that perhaps the threshold of 15 units is too high if so many schemes are avoiding affordable housing requirements. There is a need for more family sized accommodation to be built, according to the GLA's Housing SPG, published in November 2005.</p>
	<p>The site allocations document provides a strong mechanism for housing delivery on major sites, including delivery of affordable homes. Without the site allocations, delivery on key sites may not be achieved in an orchestrated way. However adopted policies, including DP3 <i>Contributions to the supply of affordable housing</i>, DP5 <i>Homes of different sizes</i> and DP6 <i>Providing quality homes</i> can be to promote affordable homes and a mix of unit sizes in new development.</p>
Poor housing conditions and overcrowding, particularly in Central and Southern wards	<p>11.9% of housing stock in Camden is deemed unfit (<i>London Divided, GLA 2002</i>). The Census occupancy rating calculates that 30% of households have fewer rooms than are required by their inhabitants and are overcrowded (<i>ONS</i>).</p>
	<p>Without the Site allocations opportunities to ensure the provision of new homes may be missed, in particular in sites that would enable</p>

Issue	Summary and Source of Evidence
	<p>residents of existing substandard accommodation to move to improved, modern premises. In the absence of the Site Allocations. The Core Strategy and Development Policies encourage housing development in appropriate locations and can be used to assess individual schemes.</p>
<p>Deprivation and Social exclusion</p>	<p>The pattern of disadvantage in Camden shows areas of relative deprivation lying adjacent to areas of affluence. At 2004, Camden was ranked 19 out of 354 local authorities in England in terms of average deprivation (<i>ODPM</i>): Borough Lowest: Frognal & Fitzjohns 18.98 Borough Highest: St Pancras and Somers Town 49.71</p> <p>Overall, Camden's relative deprivation ranking has improved both nationally and in London.</p> <p>In the absence of the Site allocations, opportunities may be missed to promote regeneration through making better use of currently under-utilised major sites, including in more deprived areas. In the absence of the Site Allocations, Camden's Core Strategy and Development policies could be used to support new development and regeneration in a more general sense.</p>
<p>Health inequalities and access to facilities</p>	<p>Health deprivation and disability are major factors in Camden's overall deprivation ranking in the Indices of Multiple Deprivation 2004. Almost a quarter (23%) of Camden's Super Output Areas fall within the 10% most health deprived areas in England (<i>IMD revised (NRU), 2004 (Camden profile, Nov 2005)</i>). Access to public open space can also impact upon health as green space can have positive therapeutic effects on human mental and physical health.</p> <p>In the absence of the site allocations, opportunities may be missed on individual sites to improve links through areas in order to improve accessibility, and to provide new community facilities where appropriate. Camden's Core Strategy and Development Policies include policies regarding provision and protection of community facilities, and promote accessibility in a general sense.</p>
<p>Planning for school provision is difficult given that children from outside the borough can attend Camden's schools and Camden children can attend schools outside the borough</p>	<p>47% of secondary aged children attend Camden schools. At March 2007, 51% of secondary aged students in the north west of the borough and south of Euston Road (areas with greatest education need pressure) were offered school places outside of Camden. At this time there were also 149 unplaced students in the borough (<i>Building Schools for the Future – Indicative Strategy for Change Part 1, July 2007</i>).</p> <p>The site allocations make provision for new schools and educational facilities on appropriate sites. These opportunities may be missed without the Site Allocations. The Core Strategy specifies particular infrastructure needs, including educational needs in the borough – the Site allocations plays an important role in helping to meet these needs by earmarking sites for potential school use.</p>
<p>There is a need to increase opportunities for education, including further education and adult learning in the borough, particularly in areas of deprivation.</p>	<p>The site allocations make provision for new educational facilities on appropriate sites. These opportunities may be missed without the Site Allocations. The Core Strategy specifies particular infrastructure needs, including educational needs in the borough – the Site allocations plays an important role in helping to meet these needs by earmarking sites for potential educational use.</p>

Issue	Summary and Source of Evidence
Reduce levels of crime and fear of crime	<p>Despite the reduction in recorded crime in Camden, local rates relating to drugs offences, burglary, robbery and violence against the person remain significant across the borough. Though crime (in its various forms and impacts) consistently appears as a priority issue for residents and businesses (<i>The Camden Crime and Disorder Audit 2004 and Strategy 2005, Safer Camden 2004</i>). The ODPM <i>Safer Places</i> document states that sustainable communities are those where people feel safe and secure. Therefore, safer places are key to sustainable communities.</p> <p>Camden Town is identified as a particular crime “hotspot” (<i>Local Community safety strategy, audits and police data</i>)</p> <p>In the absence of the Site allocations opportunities may be missed to make better use of specific under-used, vacant and derelict sites, and to promote active frontages. In the absence of the Site allocations, the design principles established in CS14 and DP24 could be used to promote appropriate design measures, and Core Strategy policy CS17 specifically promotes measures in new development to design out crime.</p>
Economic	
Unemployment and Job Opportunities for local people	<p>Camden’s unemployment rate has been falling since 2002 and is positioned mid-way between the averages for inner London (6%) and Greater London (4.6%). There are still 7 wards with higher than the Inner London average (6%). St Pancras and Somers Town ward has the highest rate (9.5%), more than 1.5 points higher than 2nd ranked King’s Cross (7.9%) and 3rd ranked Kilburn (7.3%) (<i>Camden NRS – Neighbourhood Deprivation 2005</i>)</p> <p>In the absence of the Site allocations, opportunities may be missed to seek new employment space as part of a mix of uses in new development, in particular on currently under-utilised sites. However, policies CS8 and DP13 could be used to protect existing employment uses, to guide commercial development to the growth areas, and policy CS9 could be used to promote mixed use development in Central London.</p>
Need to support development in existing centres and ensure the health of town centres.	<p><i>Camden’s Retail ‘Health Check’ Study</i> of the borough suggests that its retail centres continue to be of vital importance to its local people and wider London. With Camden Town performing the role of a Major Centre, there is little physical capacity to accommodate significant additional retail floorspace in any of Camden’s other centres. However, there is potential for new retail to emerge at Kings Cross Opportunity Area, particularly at St Pancras International and Kings Cross Central, though up to date assessments of these are not yet complete.</p> <p>In the absence of the Site allocations, Core Strategy policy CS1 could be used to focus new growth towards Camden’s growth areas, town centres and other highly accessible areas. The sequential approach under national PPS4 could also be used to guide town centre uses towards town centre locations.</p>

Issue	Summary and Source of Evidence
Balancing conflict between opposing land uses, in particular housing needs with the protection of employment land	AMR data suggests land use pressures and conflicts between uses, particularly the demand for housing development over all other land uses and the potential threat this creates for employment generating land uses. Although, Camden UDP acknowledges an oversupply of office floorspace allowing more flexibility in their conversion to other uses, especially residential.
	In the absence of the site allocations, policies DP26 and DP28 could be used to ensure that development does not have an unacceptable impact on occupiers and neighbours.
The need to manage redevelopment impacts in specific areas, especially Kings Cross Opportunity Area	Kings Cross is a key regeneration area in the borough and has London-wide significance. It will be important that regeneration objectives can contribute to the borough's needs and ensure that the adverse impacts are avoided or at least mitigated.
	In the absence of the site allocations, the supporting text under Core Strategy policy CS2 could be used to ensure that development in the growth areas has regard its impacts. The Core Strategy supporting text for the Kings Cross growth area states that development will include a range of measures to address impacts on and needs of the local area, including the provision of new community facilities.

5 The Appraisal Process

5.1 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 draft submission Site Allocations 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.

5.2 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 C.

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.

5.3 Other relevant plans, programmes and sustainability objectives

Review of plans, policies and programmes

The plans, policies and programmes reviewed during the early stages of the SA process are listed in Appendix B. These were used to help identify issues of relevance in the borough, and produce a set of sustainability objectives against which the LDF could be appraised. These objectives form the SA Framework, set out in Section 4.4 below, which were revised in light of the comments received during consultation.

Since the preferred approach Site Allocations stage, new legislation and guidance has been produced, such as the revised London Plan, the Localism Bill and the draft National Planning Policy Framework, which places a stronger focus on supporting economic development. Camden recognises this new policy landscape, and new and emerging policies have been considered during the document preparation process.

5.4 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 Sustainability 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?
3	To ensure access to local shopping, community, leisure facilities and open space	a) Will the option encourage mixed-use development? b) Will the option encourage the retention and development of key services (<u>e.g. shopping, community and leisure facilities</u>)? c) Will the option encourage the location of services in proximity to public transport <u>or increase access to services by public transport</u> ? d) Will the option help to <u>protect</u> , increase or improve open

No.	Objective	Criteria
		space and access to it?
4	To tackle poverty, social exclusion <u>and promote equal opportunities</u>	a) Will the option encourage development that facilitates social cohesion <u>and be beneficial to disadvantaged groups?</u> b) Will the option provide for equality of access for all to buildings and services? c) Will the option encourage development opportunities in those areas in need of economic development?
5	To encourage and accommodate sustainable economic growth and employment opportunities	a) Will the option encourage the retention and growth of existing, locally based industries? b) Will the option accommodate new and expanding businesses? c) Will the option encourage new investment in the local economy and promote development opportunities for employment? d) will the option promote successful centres for shopping and services?
6	To maximise the benefits of regeneration and development to promote sustainable communities	a) Will the option encourage sustainable inward investment that will promote social well-being and benefit the economy? b) Will the option promote access to employment opportunities for local people? c) Will the option provide for adequate education facilities, including life long learning?
7	To promote high quality and sustainable urban design which protects and enhances the historic environment	a) Will the option provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Will the option ensure enhancement of the public realm and local distinctiveness? c) Will the option ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value? d) Will the option encourage the use of sustainable design and construction?
8	To ensure new development makes efficient use of land, buildings and infrastructure	a) Will the option encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Will the option ensure efficient use of land through maximising densities where appropriate?

No.	Objective	Criteria
9	To reduce reliance on private motorised transport	a) Will the option encourage development at locations that enable, and infrastructure for, walking, cycling and/or the use of public transport? b) Will the option encourage access for all to public transport? c) Will the option encourage the transportation of freight by means other than road? d) Will the option encourage car free / car-capped housing?
10	To improve amenity by minimising the impacts associated with noise	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? b) Will the option ensure new noise sensitive uses are not located near existing established noise generating uses?
11	To protect and manage water resources and reduce flood risk	a) Will the option promote the sustainable use of water resources? b) Will the option encourage development that incorporates sustainable drainage? c) Does the option take into account potential flood risk in Camden? d) Will the option promote the protection and enhancement of the quality of Camden's waterways?
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	a) Will the option protect and enhance natural habitats in the borough, particularly those of priority species (includes terrestrial and aquatic)? b) Will the option provide for the protection of biodiversity and open space in the borough? c) Will the option encourage the creation of new habitats, including through the provision of additional open space and green roofs? d) Will the option protect and provide for the planting of more trees in the borough?
13	To reduce the amount of waste requiring final disposal	a) Will the option ensure reduction of waste during the development process and/or operation? b) Does the option encourage the movement of waste up the hierarchy? c) Does the option provide for the future demand for waste management
14	To improve air quality	a) Will the option reduce CO ₂ and other greenhouse gas concentrations in the atmosphere? b) Will the option reduce the discharge of particulate matter to the atmosphere? c) Will the option contribute to an improvement of air quality?
15	To provide for the efficient use of energy.	a) Will the option facilitate the installation of renewable energy facilities? b) Will the option encourage energy efficiency? c) Will the option help tackle fuel poverty?
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

6. Appraisal of the Site Allocations and alternatives

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.

6.1 Whether to allocate sites

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.

Sustainability Objectives	Allocation Approach	Non-allocation approach	Reasoning
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	↑	o	<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	↑	o	<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	o	↓	<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	↑↑		There is a very strong emphasis in allocating sites for employment use. This is particularly relevant in the

sustainable economic growth and employment opportunities		↓	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	↑↑	↓	Nearly all land developed in Camden is located on Brownfield land. Allocations on sites often seek benefits to the wider community including contribution to: - affordable housing - open space expansion and improvement - community facilities - public realm improvements - improvements to pedestrian access and routing - other specific improvements to local objectives
7. To promote high quality and sustainable urban design which protects and enhances the historic environment	↑	↓	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 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	↑	o	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

		o	<p>specified within individual construction management plans.</p> <p>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.</p> <p>In decentralising energy, Site allocations also seek local energy generation to be produced on some sites; this will inevitably produce local emissions.</p>
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	↑	↓	<p>Site allocations seek local energy generation to be provided on some sites where obvious opportunities may exist.</p> <p>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.</p>
Social	↑↑	↓	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.
Economic	↑↑	↓	Site allocations have a strong emphasis in identifying and allocating sites for future employment growth. Allocations also seek to protect employment uses particularly where they are for light workshops which provide a good source for local employment.
Environment	↑	↓	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 and identifies impacts on heritage assets.

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.

6.2 Appraisal of individual site allocations

The approach to allocating individual sites individual sites was guided by the use of a number of site selection criteria that have been used to decide whether sites should be included. These criteria include size, likely deliverability, existing protected uses and environmental constraints. Further information on the council’s approach to the selection of sites is provided in Appendix E.

The table below provides the assessment of the individual Site allocations against the council's Sustainability objectives. The sites within this table are those that have been included within the Site Allocations submission document.

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, set out in Appendix D; and
- Information sources contained within the Sustainability Appraisal Scoping Report.

A commentary on the assessment of the sites follows below.

Sustainability Appraisal Assessment of Sites included within the Site Allocations document

Table 2a: Sites within the King's Cross and St Pancras area																	
		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	King's Cross Growth Area	↑↑	↑↑	↑↑	↑↑	↑↑	↑↑	↑↑	↑↑	↑	↑	↑↑	↑	↓	↓	↑↑	↑↑
2	Camden Town Hall Extension	0	↑	↑	0	↑	↑	↑↑	↑	↑	0	0	0	↓↓	0	0	0
3	Pentonville Road, Lighthouse block	0	↑	0	0	↑	↑	↑↑	0	↑	↓↓	0	0	↓	0	0	0
4	277a Grays Inn Road	↑↑	0	↑	↑	0	↑	↑↑	↑	↑↑	↑	↑	↑	↓	↑	↑	↑
5	Midland Road Site, Land to rear of British Library	0	↑	0	0	↑	↑↑	↑	↑	↑↑	↑	↑	↑	↑	0	↑↑	↑↑
6	4 St Pancras Way (St Pancras Hospital)	↑↑	↑↑	↑	↑	↑	↑↑	↑↑	↑↑	↑	↑	↑	↑	↓	↑	↑↑	↑↑
7	103 Camley Street	↑	↑	↑	↑	↓	↑	↑↑	↑↑	↑↑	↑	↑↑	↑↑	↑	0	0	0
8	Westminster Kingsway College, Grays Inn Rd, Sidmouth St	↑	↑	↑	↑	0	0	↑	↑	↑	↑	0	↑	↑	0	↑↑	↑↑

All of the sites in the Kings Cross area provide the potential to generate improvements in terms of design and protecting and enhancing the historic environment through the provision of buildings and development that would be of better design than existing, and/ or improving the setting of existing heritage assets: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

All sites would also deliver positive impacts in terms of regeneration, by allowing better use of existing sites, enhancing the appearance of the area and introducing new uses, including commercial uses that would provide new employment opportunities.

All of the sites in the Kings Cross area would also allow better use of land by facilitating more efficient use of land, whilst also minimising reliance on private transport by locating new development in an area of very high public transport accessibility.

A number of the sites in the Kings Cross area have the potential to generate negative impacts in terms of waste generation. This potential impact should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22).

The Kings Cross Growth Area would generate significant positive effects in terms of a number of issues such as housing, access to services, economic growth and regeneration through the delivery of a large number of homes, employment opportunities, shops, community facilities and other mixed uses. Potential negative impacts in terms of waste generation and air quality should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22), recycling and waste storage provision (DP26) and air quality mitigation measures (DP32).

The Camden Town Hall Extension would deliver strong benefits in terms of design and the historic environment by allowing an improved building next to the Grade II Listed Camden Town Hall, thus enhancing the setting of a listed building. New commercial uses provide the potential to generate economic growth and improved access to facilities. The scheme could generate significant negative impacts in terms of waste due to the demolition of the existing building on the site. Potential negative impacts in terms of waste generation should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22).

Pentonville Road Lighthouse Block would deliver significant positive impacts through enhancing the setting of the historic lighthouse block whilst improving the appearance of the wider area. The introduction of new commercial uses in a currently mainly vacant site would help to support economic growth, and these new uses and improvements to the appearance and feel of the wider area would contribute to regeneration

277a Grays Inn Road provides the opportunity to deliver new housing whilst allowing a change of use for the site to a mix of uses that would have a lesser impact on amenity in the area, for example in terms of noise and air quality. The Midland Road site introduces a mix of uses that would have a lesser impact on amenity in the area, for example in terms of noise, whilst the potential for local energy generation on the site would generate significant benefits in terms of energy.

4 St Pancras Way (St Pancras Hospital) would generate significant positive impacts in terms of housing by allowing the delivery of a large number of new homes on the site. It would also provide health benefits by facilitating the provision of improved health services on-site, and off site as appropriate. The potential for local energy generation on the site would generate significant benefits in terms of energy.

103 Camley Street could deliver positive impacts through enhancing accessibility (for example to the canal) and making better use of a currently under-utilised site. However it would generate negative impacts in terms of economic growth through the displacement of existing employment uses on the site. Development Policy DP13 should therefore be used in considering any redevelopment proposals to ensure that employment space is retained as appropriate.

Westminster Kingsway College would deliver benefits in terms of housing provision and potential enhancements to the setting of the adjacent open space. It could generate a positive impact in terms of energy as it has the potential to provide local energy generation on-site, which could also be exported to surrounding developments.

Table 2b: Sites within the Euston area																	
		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
9	Euston Station, Euston Road	↑↑	↑	↑↑	↑↑	↑↑	↑↑	↑↑	↑↑	↑↑	↑	↑	↑	↓↓	↓	↑↑	↑↑
10	132-140 and 142 Hampstead Rd (BHS Warehouse)	↑↑	↑	↑↑	↑	↑	↑↑	↑	↑	↑↑	↓	0	↑	↓	0	↑↑	↑↑
11	Granby Terrace	↑↑	↑	↑	↑	↑	↑↑	↑	↑↑	↑	↓	↑	↑	0	0	↑↑	↑↑
12	110-122 Hampstead Road (Former National Temperance Hospital)	↑↑	↑	↑	↑	0	↑	↑	0	↑	↓	0	↑	↓	0	↑↑	↑↑
13	1-39 Drummond Crescent (Euston Traffic Garage)	↑↑	0	↑	↑	↑	↑	↑	↑↑	↑↑	↑	0	0	↓	↑	↑	↑
14	Westminster Kingsway College, Longford Street	↑	↑	↑	↑	↑	↑↑	↑↑	↑↑	↑	↑	↑	0	0	↑	↑↑	↑↑
15	Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East/Augustus St	↑↑	↑	↑↑	↑	↑	↑↑	↑↑	↑↑	↑	↑	↑	↑	0	↑	↑↑	↑↑

All of the sites in the Euston area provide the potential to generate improvements in terms of design and protecting and enhancing the historic environment through the provision of buildings and development that would be of better design than existing, and/ or improving the setting of existing heritage assets: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

All sites would also deliver positive impacts in terms of regeneration, by allowing better use of existing sites, enhancing the appearance of the area and introducing new uses, including commercial uses, that would provide new employment opportunities. All sites would also generate benefits in terms of housing by providing the potential to deliver significant additional housing to meet needs and demand in the borough.

All of the sites in the Euston area would also allow better use of land by facilitating more efficient use of land, whilst also minimising reliance on private transport by locating new development in an area of very high public transport accessibility.

All of the sites in the Euston area provide the potential to generate positive impacts in terms of energy through contributing to the development of a local energy/ CHP network in the area.

A number of the sites in the Euston area have the potential to generate negative impacts in terms of waste generation. This potential impact should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22), and recycling and waste storage provision (DP26).

The redevelopment of Euston Station would generate a very positive impact in terms of the delivery of additional housing and supporting economic growth through the provision of new employment opportunities. The site would also improve access to facilities through providing new facilities and services on site as part of mixed use development. The scheme could generate short term negative impacts in terms of waste and air quality due to the extent of development and demolition of the existing building on the site. These impacts should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22), recycling and waste storage provision (DP26) and air quality mitigation measures (DP32).

132-140 and 142 Hampstead Rd (BHS Warehouse) provides the potential to enhance accessibility (including to nearby open space) by providing new linkages across the site. The site could experience negative sustainability impacts as a result of noise from the railway line, which could affect the potential for residential on the site. Policy DP28 of the Camden Development Policies addresses the impacts of development on amenity in terms of noise, and the supporting text refers to the need for PPG24 noise assessments in appropriate circumstances. This is also referred to on the supporting text of the site allocation.

110-122 Hampstead Road (Former National Temperance Hospital) could experience negative sustainability impacts as a result of noise from Hampstead Road, which could affect the potential for residential on the site. In order to address these impacts, in assessing any development proposals consideration should be given to Policy DP28 of the Camden Development Policies, which addresses noise issues, whilst the supporting text to DP28 also refers to the need for PPG24 noise assessments in appropriate circumstances.

1-39 Drummond Crescent (Euston Traffic Garage) would allow the provision of new homes and jobs, or new educational uses, generating potential positive impacts in terms of housing, economic growth and access to facilities.

Granby Terrace could provide open space on the site, which would be of benefit to the wider area. The site could experience negative sustainability impacts as a result of noise from the railway line, which could affect the potential for residential on the site. The supporting text refers to the need for a Noise assessment as part of any residential on the site.

Westminster Kingsway College, Longford Street could help to encourage pedestrian movement and accessibility by improving the public realm in the area. The allocation only allows for the loss of the community use on the site (education) if this use can be satisfactorily relocated elsewhere.

Redevelopment of Land at Goldsmith’s House and adjoining land would allow more efficient use of the site, providing the potential to provide new community uses and open space on the site.

Table 2c: Sites within the Tottenham Court Road area																	
		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
16	St Giles Circus / Denmark Place	↑↑	↑↑	↑↑	↑	↑↑	↑↑	↑↑	↑↑	↑↑	↑	↑	0	↑	↑	↑↑	↑↑
17	6-17 Tottenham Court Road and 5, 6 & 12 Hanway Place	↑	↑	↑	↑	↑↑	↑↑	↑↑	↑↑	↑↑	↑	0	0	↓	0	0	o
18	The Royal Mail Sorting Office, 21-31 New Oxford Street	↑	0	↑	↑	↑↑	↑↑	↑	↑↑	↑↑	0	0	0	↓	0	↑↑	↑↑
19	Land Bound by New Oxford Street, Museum Street and West Central Street	↑	0	0	0	↑	0	↑↑	0	0	↓	0	0	↓	0	↑	↑

All of the sites in the Tottenham Court Road area provide the potential to generate improvements in terms of design and protecting and enhancing the historic environment through the provision of buildings and development that would be of better design than existing, and/ or improving the setting of existing heritage assets: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

All sites would also deliver positive impacts in terms of regeneration, by allowing better use of existing sites, enhancing the appearance of the area and introducing new uses, including commercial uses, that would provide new employment opportunities. All sites would also generate benefits in terms of housing by providing the potential to deliver significant additional housing to meet needs and demand in the borough.

All of the sites in the Tottenham Court Road area could also generate economic benefits through the introduction of new commercial uses that would provide employment and contribute to the economy of the area.

A number of the sites in the Tottenham Court Road area have the potential to generate negative impacts in terms of waste generation. This potential impact should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22), and recycling and waste storage provision (DP26).

St Giles Circus/ Denmark Place offers the potential to contribute to improve accessibility and health through contributing to significant improvement to the area, in particular to the public realm and the pedestrian environment. This, and the introduction of new mixed uses, including commercial uses would contribute to regeneration and economic growth.

6-17 Tottenham Court Road and 5, 6 & 12 Hanway Place provides the opportunity to make more efficient use of the site through higher density mixed use development, with opportunities to significantly improve pedestrian movement in the area through new links through the site. The Royal Mail Sorting Office, 21-31 New Oxford Street provides the opportunity to make better use of a currently vacant site, with the potential to introduce a more attractive built form on the site with an improved public realm to encourage and facilitate pedestrian movement, as well as providing on-site local energy generation.

Land Bound by New Oxford Street, Museum Street and West Central Street could experience negative sustainability impacts as a result of noise from New Oxford Street traffic to the north edge of the site, which could affect the potential for residential on this area of the site. In order to address these impacts, in assessing any development proposals consideration should be given to Policy DP28 of the Camden Development Policies, which addresses noise issues, whilst the supporting text to DP28 also refers to the need for PPG24 noise assessments in appropriate circumstances.

Table 2d: Sites within the Holborn area																	
		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
20	12-42 Southampton Row & 1-4 Red Lion Square	↑	0	↑	↑	↑	↑	↑↑	0	↑↑	0	0	0	↓	0	0	0
21	Land Bounded by 50-57 High Holborn, (including Brownlow House High Holborn House & Caroline House) 18-25 Hand Court , 45-51 Bedford Row & Brownlow Street, London WC1V 6RL	↑	0	↑	0	↑	↑	↑↑	↑↑	↑	↑	0	0	↓↓	0	0	0

Both sites in the Holborn area offer the potential to generate significant improvements in terms of the design quality of buildings on the site and protecting and enhancing the conservation areas in which they are located: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

They would also deliver positive impacts in terms of regeneration, by allowing better use of existing sites, enhancing the appearance of the area. Both sites would also generate benefits in terms of housing by providing additional homes to meet needs and demand in the borough.

Both sites may generate negative impacts in terms of waste generation through the demolition of existing buildings. This potential impact should be dealt with using Camden’s Development Policies, which address sustainable design and construction (DP22), and recycling and waste storage provision (DP26).

Table 2e: Sites within Highly accessible locations: Bloomsbury/ Fitzrovia																	
		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
22	Middlesex Hospital Annexe, Cleveland Street	↑↑	0	↑	↑↑	0	↑	↑	↑↑	↑↑	↑	0	0	↓	0	↑↑	↑↑
23	Arthur Stanley House, 44-50 Tottenham Street	↑	↑	↑	0	0	↑	↑↑	↑	↑↑	↑	0	0	↓	0	↑	↑
24	Grafton Way, Odeon Cinema site	↑	↑	↑	0	↑↑	↑	↑	↑↑	↑↑	↑	0	0	↑	0	↑	↑
25	Senate House (north block) Malet Street	0	0	↑	0	↑	↑	↑↑	↑	↑	↑	↓	↓	↑	0	↑	↑
26	27 Gordon Square and 15 Gordon Street	0	↑	↑	↑	↑	↑↑	↑↑	↑↑	↑	↑	↑	0	↑	↑	↑↑	↑↑
27	20-22 Gordon Street	↑	↑	↑↑	↑	↑	↑↑	↑↑	↑↑	↑	↑	↑	0	↑	↑	↑↑	↑↑

All of the sites in the Bloomsbury/ Fitzrovia area provide the potential to generate improvements in terms of design and protecting and enhancing the historic environment through the provision of buildings and development that would be of better design than existing, and/ or improving the setting of existing heritage assets: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

Sites in the Bloomsbury/ Fitzrovia area would also allow better use of land by facilitating more efficient use of land, whilst also minimising reliance on private transport by locating new development in an area of very high public transport accessibility.

Two sites in the Bloomsbury/ Fitzrovia area have the potential to generate negative impacts in terms of waste generation as a result of demolition works. Potential waste issues should be dealt with using Camden’s Development Policies, which address sustainable design and construction (DP22).

The Middlesex Hospital annexe, Cleveland Street would generate significant sustainability benefits in terms of housing by delivering a large number of new homes. It would also generate significant benefits in terms of energy through the potential to provide on-site local energy generation.

Arthur Stanley House, 44-50 Tottenham Street offers the potential to make better use of a currently vacant site through the provision of a mix of uses. The redevelopment of Grafton Way, Odeon Cinema site, the Senate House (north block) and 27 Gordon Square and 15 Gordon Street sites would also allow more effective use of currently under used (clear) sites. The development of Senate House site in accordance with the allocation would also improve access to facilities to the wider community through the provision of new university, education or community uses. Similarly, the development identified for Gordon Street/ Gordon Square would also generate benefits through the provision of education or residential uses.

20-22 Gordon Street would generate benefits in terms of access to facilities and regeneration through the provision of improved educational facilities, along with the potential to achieve a positive impact in terms of housing by providing new homes as a secondary use.

Table 2f: Sites within the Farringdon area																	
		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
28	Phoenix Place	↑↑	↑	↑	↑	↑↑	↑↑	↑↑	↑↑	↑	↑	↑	↑	↑	↑	↑↑	↑↑
29	Herbal House, 10 Back Hill	↑	0	↑	0	↑	↑	↑↑	0	↑↑	↑	0	0	0	0	↑↑	0
30	Land bound by Wren Street, Pakenham Street, Cubit Street, Langton Walk	↑	↑	↑↑	↑↑	0	↑	↑	↑	↑↑	0	↑	0	↓	0	↑↑	↑↑

All of the sites in the Farringdon area provide the potential to generate improvements in terms of design and protecting and enhancing the historic environment through the provision of buildings and development that would be of better design than existing, and/ or improving the setting of existing

heritage assets: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

All sites would also deliver positive impacts in terms of regeneration, by allowing better use of existing sites, enhancing the appearance of the area and introducing new uses, including commercial uses that would provide new employment opportunities. All sites would also generate benefits in terms of housing by providing the potential to deliver significant additional housing to meet needs and demand in the borough.

The redevelopment of Phoenix Place provides the potential to make better use of an under-utilised site, with sustainability benefits from introduction a less vehicle-dependent use on the site, and energy benefits from the potential to provide local energy generation on the site. The introduction of mixed uses on the site (including residential and commercial uses) would bring significant regeneration and economic growth benefits, given its current use.

Herbal House, 10 Back Hill could accommodate new mixed uses including residential following the relocation of the existing education use. The site offers to potential to accommodate on-site local energy generation.

Land bound by Wren Street (etc) provides the opportunity to provide a new secondary school, if the need is identified. Therefore whilst the education option for the site would involve the loss of light industrial uses, this option would generate long term economic benefits for the area through the provision of a new education establishment. This would generate a neutral impact overall. The other redevelopment option (if no school is required) would have a neutral economic impact as light industrial uses would be retained. The site offers to potential to accommodate on-site local energy generation. The redevelopment of the site may generate negative impacts in terms of waste generation through the demolition of existing buildings. This potential impact should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22).

Table 2g: Sites within the West Hampstead and Swiss Cottage area																	
		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
31	187-199 West End Lane	↑↑	↑	↑	↑	↓	↑	↑	↑↑	↑↑	↓↓	0	↑	0	↑	↑	↑
32	156 West End Lane	↑↑	↑	↑	↑	↓	↑↑	↑↑	↑↑	↑↑	↓	↑	↑	↑	0	↑↑	↑↑
33	O2 Centre Car park	↑↑	↑	↑	↑↑	↑	↑	↑	↑	↑↑	↑	↑	↑↑	↑	↑	↑	↑
34	100 Avenue Road, Swiss Cottage	↑	0	↑	0	↓	0	↑	0	↑	↓	↑	0	0	0	0	0
35	Belsize Road Car Park	↑↑	↑	↑	↑	0	↑	↑↑	↑↑	↑	↓	↑↑	↑↑	↓	↑	↑	↑

All of the sites in the West Hampstead and Swiss Cottage area provide the potential to generate improvements in terms of design and protecting and enhancing the historic environment through the provision of buildings and development that would be of better design than existing, and/ or improving the setting of existing heritage assets: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

All sites (with the exception of Swiss cottage School) would also generate benefits in terms of housing by providing the potential to deliver significant additional housing to meet needs and demand in the borough.

Sites in the West Hampstead and Swiss Cottage area would also allow better use of land by facilitating more efficient use of land, whilst also minimising reliance on private transport by locating new development in an area of very high public transport accessibility.

Some sites in the West Hampstead and Swiss Cottage area have the potential to generate negative impacts in terms of waste generation as a result of demolition works. Potential waste issues should be dealt with using Camden’s Development Policies, which address sustainable design and construction (DP22).

Development at 187-199 West End Lane and at 156 West End Lane could generate benefits by making more efficient use of both sites. However, their redevelopment could have a negative impact on economic growth if existing business premises are lost. Both allocations and supporting text refer to the retention of employment uses on the site. Development Policy DP13 should also be used in considering any redevelopment proposals to ensure that employment space is retained as appropriate.

187-199 West End Lane, at 156 West End Lane and Belsize Road Car Park are both adjacent to railway lines, which could have negative sustainability in relation to noise, and the acceptability of the residential environment. In order to address these impacts, in assessing any development proposals consideration should be given to Policy DP28 of the Camden Development Policies, which addresses noise issues, whilst the supporting text to DP28 also refers to the need for PPG24 noise assessments in appropriate circumstances. Potential negative impacts in terms of waste generation should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22).

The redevelopment of the O2 Centre car park would generate sustainability benefits by improving a car park (in an area highly accessible by public transport) with a range of mixed uses, as well as offering opportunities to improve accessibility through the site.

100 Avenue Road, Swiss cottage could generate negative sustainability impacts through the loss of existing office uses on the site. However, the allocation mitigates this potential impact by stating that any redevelopment should retain or re-provide employment floorspace on the site. The site is adjacent to the busy Swiss Cottage gyratory, which could have negative sustainability in relation to noise, and the acceptability of the environment for any future residential uses. In order to address this, in assessing any development proposals consideration should be given to Policy DP28 of the Camden Development Policies, which addresses noise issues, whilst the supporting text to DP28 also refers to the need for PPG24 noise assessments in appropriate circumstances.

Table 2h: Sites within Highly accessible locations: Camden Town and surrounds																	
		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
36	Hawley Wharf and 39 Kentish Town Road	↑	↑↑	↑↑	↑↑	↑	↑↑	↑↑	↑↑	↑↑	↓	↑↑	↑↑	↑	0	↑↑	↑↑
37	202-212 Regents Park Road (Roundhouse car park)	↑↑	↑	↑	↑	↑	↑↑	↑↑	↑↑	↑↑	0	0	↑	↑	0	0	0
38	2-12 Harmood St / rear of 34 Chalk Farm Road	↑	↑	↑	0	0	0	↑↑	↑↑	↑	↑	0	0	↑	0	0	0
39	Bangor Wharf	↑	↑	↑	↑	↑↑	↑↑	↑↑	↑↑	↑	↑	↑	↑	↑	↑	↑↑	↑↑
40	57-71 Pratt Street	↑	↑	↑	↑	↑↑	↑↑	↑↑	↑↑	↑	↑	↑	↑	↑	↑	↑↑	↑↑
41	24-58 Royal College Street	↑↑	↑	↑	↑	↑↑	↑↑	↑↑	↑↑	↑	↑	↑	↑	↑	↑	↑↑	↑↑

All of the sites in the Camden Town area provide the potential to generate significant sustainability benefits in terms of design and protecting and enhancing the historic environment through the provision of buildings and development that would be of better design than existing, and/ or improving the setting of existing heritage assets: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

All sites would also generate benefits in terms of housing by providing the potential to deliver significant additional housing to meet needs and demand in the borough. Sites in the Camden Town area would also allow better use of land by facilitating more efficient use of land, whilst also minimising reliance on private transport by locating new development in an area of very high public transport accessibility.

Hawley Wharf could deliver a range of sustainability benefits, for example through the provision of mixed uses including retail, residential and community uses to meet local needs and add to the vibrancy of the area. However, it could generate negative impacts relating to noise, due to the location of two railway lines which dissect the site, which could impact on the amenity of residential uses. In order to address these impacts, in

assessing any development proposals consideration should be given to Policy DP28 of the Camden Development Policies, which addresses noise issues, whilst the supporting text to DP28 also refers to the need for PPG24 noise assessments in appropriate circumstances.

202-212 Regents Park Road (Roundhouse car park) would allow more effective use of a currently under-utilised site. 2-12 Harmond St / rear of 34 Chalk Farm Road would involve redevelopment of a site previously used for employment uses. However, a planning Inspector for a previous planning application has already allowed for the exploration of other uses on the site, namely residential and mixed use. As such, it is considered that mixed use redevelopment would not have a negative impact in terms of economic growth, as a change from the existing uses has already been allowed for on the site.

Bangor Wharf, 57-71 Pratt Street and 24-58 Royal College Street together provide the potential to provide local energy generation, which could connect to nearby housing estates. This would deliver significant benefits in terms of energy use. Redevelopment of these sites would enable better use of currently under-utilised sites, whilst allowing for re-provision of existing uses as needed, such as employment uses, alongside new residential use.

Table 2i: Sites in other localities																	
		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
Kentish Town and Gospel Oak																	
42	115 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery	↑↑	↑↑	↑	↑↑	↑	↑↑	↑↑	↑	↑	↑	↑	↑	↓	0	↑↑	↑↑
43	19-37 Highgate Road, Day Centre and 25 & 37 Greenwood Place	↑	↑	↑	↑↑	↑	↑	↑	↑	↑	↓	0	0	↓	0	↑	↑

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44	Kentish Town Police Station	↑	↑	↑	↑	↑↑	↑↑	↑↑	↑↑	↑	↑	↑	↑	↑	↑↑	↑↑
45	Fire Station, 20 Highgate Road	↑	↑	↑↑	↑	↑	↑↑	↑↑	↑↑	↑	↑	↑	↑	↑	↑↑	↑↑
Hampstead																
46	29 New End, Former Nurses Hostel	↑	0	0	0	0	0	↑↑	↑	↑	↑↑	0	↑	↓	0	0
Primrose Hill																
47	St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir, NW8	↑	0	0	0	0	0	↑	↑	↑	0	↓	↓	↓	0	0

All of the sites in the Camden Town area provide the potential to generate significant sustainability benefits in terms of design and protecting and enhancing the historic environment through the provision of buildings and development that would be of better design than existing, and/ or improving the setting of existing heritage assets: scale, massing and detailed design and layout of development should take into account the character and distinctiveness of nearby heritage assets.

All sites would also generate benefits in terms of housing by providing the potential to deliver new or improved housing to meet needs and demand in the borough.

115 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery provides the potential to significantly improve housing provision by facilitating the provision of replacement homes to replace current substandard units, as well as providing new housing. Potential harm to economic growth through any loss of employment space is mitigated by requirement to provide replacement employment space, either on-site or in another location. This site may generate negative impacts in terms of waste generation in association with the demolition of existing buildings. This potential impact should be dealt with using Camden’s Development Policies, which address sustainable design and construction (DP22).

19-37 Highgate Road, Day Centre and 25 & 37 Greenwood Place would enable new housing provision whilst allowing re-provision of community facilities and replacement employment space. This site may generate negative impacts in terms of waste generation in association with the demolition of existing buildings. This potential impact should be dealt with using Camden’s Development Policies, which address sustainable design and construction (DP22).

Development on the Kentish Town Police Station site could allow delivery of new housing alongside re-provision of police facilities, as required as part of a review of Metropolitan Police assets. Potential impacts on the listed building on the site are mitigated by a requirement in the allocation that development should preserve the listed building and its setting. Development at 20 Highgate Road would allow better use to be made of the existing site, supporting mixed use regeneration alongside replacement fire station if needed.

29 New End, Former Nurses Hostel would allow redevelopment to provide additional housing including the provision of new hostel pace as an alternative form of affordable housing if appropriate. This site may to generate negative impacts in terms of waste generation in association with the

demolition of existing buildings. This potential impact should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22).

St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir: Core Strategy policy CS15 should be used to address any issues that arise in relation to the need for replacement green space/ habitat to replace any lost by redevelopment. Policy DP23 of the Development Policies should be used to address any residual drainage/ flooding issues relating to the adjacent covered reservoir. The new uses on the site would not generate any worse emissions than existing uses, and thus is not considered to generate a negative impact in terms of air quality. This site may generate negative impacts in terms of waste generation in association with the demolition of existing buildings. This potential impact should be dealt with using Camden's Development Policies, which address sustainable design and construction (DP22).

KEY:

↑ ↑	Likely large positive impact
↑	Likely positive impact
○	Uncertain impact or no relationship
↓	Likely negative impact
↓ ↓	Likely large negative impact

6.3 Alternative land uses for allocated sites

The approach taken to the land uses on individual sites was taken within the parameters of the policies set out in the Camden Core Strategy and Development Policies DPDs, which have themselves been subject to sustainability appraisal. However, a brief assessment of main alternative land uses for each site and their overall performance in sustainability terms is set out in Appendix F.

6.4 Alternative sites

Camden has examined a number of suggested alternative development sites that have not been allocated. In many cases, sites were not included because they did not meet the criteria set out for inclusion within the Site Allocations document (for example the minimum site size) or because there are concerns regarding their deliverability. Some sites were also excluded on sustainability grounds.

A list of excluded sites, and the reasons why these alternative sites were not taken forward has been prepared separately and will be included within the submission documents.

6.5 Evaluating the Effects of the DPD

The findings from the assessment of the site allocations draw out three main conclusions:

1. The collective impact of Site Allocations overall had a positive impact when assessed against SA objectives.
2. The total scores for the individual SA objectives had a varying degree of performance both positive and negative. The performance of these individual objectives generally correlates with our expectations of the Site Allocations Approach (Refer to Table 1).
3. Where sites did not perform so well against individual SA objectives, the appraisal highlights areas where Camden can seek to address mitigation measures, in order to address any potential adverse impacts. These mitigation measures are set out for each site (as appropriate) in Section 5.2 above.

The appraisals summarised above indicate predominantly positive impacts arising from the site allocations approach and the site-specific allocations which have been preferred. This is primarily because the selection of sites and their spatial distribution has been carried out with regard to the Core Strategy policies. The site-specific elements of the appraisal is based on the suggested approach set out for each of the sites, but is necessarily limited by the general nature of these preferences which have sought to avoid being overly prescriptive. Therefore, sustainability issues such as the detailed design of developments and their environmental performance has not been considered as this is beyond the scope of the Site Allocations document, even though such aspects may have a significant bearing on the eventual sustainability of developments. These issues would be considered following submission of individual planning applications and assessed against the policies found in the Core Strategy and Development Policies, the sustainability of which has been tested through separate appraisals.

The assessment provided in Section 6.2 above demonstrates that the Site Allocations would be likely to have a positive impact in implementing the aims and objectives of the Core Strategy, for example by facilitating significant housing provision, focusing development on key growth areas, seeking mixed uses where appropriate, and promoting local energy generation on sites with the most potential.

6.6 Mitigation Measures

The purpose of the Sustainability Appraisal is not to definitively rule sites in or out, but to take a systematic approach to the assessment of potential impacts. Where possible constraints are identified, it provides the opportunity to consider how these might be mitigated. While some of the sites within Tables 2a-2i have been identified as having potential negative impacts in relation to particular objectives, this does not mean that overall the allocation of these sites is 'unsustainable'.

In many cases measures could be implemented to mitigate potential adverse outcomes and in any cases these can be addressed through the development approvals process. An example of this might be where a site contains or is in proximity to a listed building. This would not prevent approval of a development proposal provided any such proposal was designed sensitively to avoid adverse effects on that building's setting. Potential mitigation measures are set out for each site under tables 2a-2i above.

6.7 Monitoring

Monitoring the significant sustainability effects of implementing the DPD is an important ongoing element of the sustainability appraisal process. Given the inherent long-term nature of sustainability and strategic planning, monitoring the implementation of the DPD from a sustainability perspective can ensure that the identified sustainability objectives, which form the core of this appraisal, are being achieved and, where not, what action may be appropriate to address this.

As required by Regulation 48 of the Town and Country Planning Regulations 2004 the Council will produce an Annual Monitoring Report. It will be important that the Council works to integrate monitoring the implementation of the Site Allocations DPD for the purposes of the Annual Monitoring Report and the sustainability monitoring of significant effects. Linking the development of measures and indicators for the SPD to the sustainability appraisal objectives, identified effects, and suggested mitigation measures. This combined approach will also provide a defined process and timeframe and would also establish clear responsibilities for monitoring.

Appendix A - Compliance with SEA Directive/Regulations

<ul style="list-style-type: none">• SEA Requirement• (as set out in EU Directive 2001/42/EC)	<ul style="list-style-type: none">• Where Covered in SA Report
<ul style="list-style-type: none">• a) An outline of contents, main objectives of the plan or programme and relationship with other plans and programmes• b) The relevant aspects of the current state of the environment and the likely evaluation thereof without implementation of the plan or programme	<ul style="list-style-type: none">• An outline of the contents of the Site Allocations document is set out in Section 3.2.• The vision and objectives are detailed in Section 5.2 of this SA Report.• Appendix 1 of the SA Scoping Report outlines the relationship with other plans, programmes and policies.• Section 5.3 and Appendix B of this SA Report address the plans policies and programmes that were reviewed as part of the SA process.• Section 5 and Appendix 2 of the SA Scoping Report (October 2008) together provide detailed baseline information for the borough. Building on this, Section 6 of the Scoping report sets out key issues relating to the current state of the environment.• Section 4 of this SA report summarises the baseline characteristics of the borough. It covers the basic characteristics and sustainability issues in the borough, and provides a brief assessment of the likely evolution of the current state of the environment without the implementation of the Site allocations. Section 5 of the Sustainability appraisal of the Camden Core Strategy also sets out baseline characteristics of the borough.
<ul style="list-style-type: none">• c) The environmental characteristics of the areas likely to be significantly affected	<ul style="list-style-type: none">• This is covered in Appendix 2 of the Scoping Report published in October 2008 which identifies they key baseline information for the Borough and in the Core Strategy itself which identifies the key growth areas and areas for change in the Borough and their key characteristics.• The baseline environmental characteristics of the borough are also contained in section 4 of this report.
<ul style="list-style-type: none">• d) any existing environmental problems which are relevant to the plan or programme including those relating to areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	<ul style="list-style-type: none">• No areas subject to such designations are affected by the Site Allocations document
<ul style="list-style-type: none">• e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have	<ul style="list-style-type: none">• These area set out in Appendix 1 of the SA Scoping Report published in October 2008.• See also section 5.3 of this SA report which briefly outlines how these have been considered in the preparation of the Site Allocations.

SEA Requirement	Where Covered in SA Report
<ul style="list-style-type: none">• (as set out in EU Directive 2001/42/EC) been taken into account during its preparation• f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationships between these factors• g) The measures envisaged to prevent, reduce and as full as possible offset any significant adverse effects on the environment of implementing the plan or programme• h) Outline the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information• i) A description of measures envisaged concerning monitoring• j) a non-technical summary of the information provided under the above headings	<ul style="list-style-type: none">• These issues are all covered in the 16 sustainability objectives against which all of the allocated sites have been assessed in Section 6.2 of the main Report• Mitigation measures are referred in Section 6.2 of the main Report• Section 6 and Appendices F and G to this SA report detail how the main options were considered while the gaps and difficulties in obtaining some baseline data was explained in Section 5 of the SA Scoping Report published in October 2008• Proposed monitoring measures are summarised in Section 6.7 of this SA Report• A non-technical summary is provided at Section 1 of this SA Report.

Appendix B - List of other relevant plans, programmes and sustainability objectives

Johannesburg World Summit on Sustainable Development Commitments (2002)
The UN Millennium Declaration and Millennium Development Goals (2000)
UN Framework Convention on Climate Change (UNFCCC) (1992) and Kyoto Protocol (1997)
Directive 85/337/EEC as amended by 1997/11/EC: Assessment of the Effects of certain Public and Private Projects on the Environment (1985 and 1997)
Renewed EU Sustainable Development Strategy (2006)
European Spatial Development Perspective (1999)
"Environment 2010: Our Future, Our Choice": The Sixth Environmental Action Programme of the European Community 1600/2002/EEC (2002)
Directive 1996/62/EC: Air Quality Framework (1996) and Daughter Directives (1999, 2000 & 2002)
The EU Water Framework Directive (2000/60/EC)
Directive 2001/77/EC: Electricity Production from Renewable Energy Sources (2001)
Directive 2002/49/EC: Environmental Noise
EU Habitats Directive (92/43/EC)
EU Birds Directive (79/409/EC)
A Better Quality of Life: A strategy for Sustainable Development in the UK (UK Govt 1999)
The UK Sustainable Development Strategy: Securing the Future (UK Govt 2005)
Sustainable Communities: Building for the Future (ODPM 2003)
Sustainable Communities in London: Building for the Future (ODPM 2003)
Sustainable Communities: Homes for All (ODPM 2005)
The Code for Sustainable Homes: Setting the standard in sustainability for new homes (DCLG February 2008)
Climate Change: The UK Programme 2006 (UK Govt 2006)
Department for Transport 10 Year Transport Plan (DETR 2000)
Transport White Paper-The Future of Transport: A Network for 2030 (DoT 2004)
National Air Quality Strategy for England; Wales; Scotland and Northern Ireland: Working Together for Clean Air (DEFRA 2000 and updated 2003)
Energy White Paper-Our Energy Future, Creating a Low Carbon Economy (DTI 2003)
Building a Greener Future – Towards Zero Carbon Development, 2006
Waste Strategy for England (Defra 2007)
Urban White Paper-Our Towns and Cities: The Future (ODPM 2000)
By Design: Urban Design in the Planning System-Towards Better Practice (ODPM and CABE 2000)
Guidance on Tall Buildings (CABE and English Heritage 2007)
Safer Places: The Planning System and Crime Prevention (Home Office and ODPM 2004)
BREEAM/EcoHomes Assessment (BRE 2006)
UK Biodiversity Action Plan (1994)
Working with the Grain of Nature: A Biodiversity Strategy for England (2002)
Better Buildings Better Lives (Sustainable Buildings Task Group 2004)

Planning and Access for Disabled People – A Good Practice Guide
Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites
PPS1: Delivering Sustainable Development (ODPM February 2005)
PPS1: Planning and Climate Change - Supplement to Planning Policy Statement 1 (DCLG December 2007)
PPG2: Green Belts (DCLG January 1995)
PPS3: Housing (DCLG November 2006)
PPG4: Industrial, Commercial Development and Small Firms (November 1992)
Consultation Paper on a new PPS4: Planning for Sustainable Economic Development.
PPS6: Planning for Town Centres (ODPM March 2005)
PPG8: Telecommunications (ODPM August 2001)
PPS9: Biodiversity and Geological Conservation (ODPM August 2005)
PPS10: Planning for Sustainable Waste Management (ODPM July 2005)
PPS12: Local Spatial Planning (June 2008)
PPG13: Transport (ODPM March 2001)
PPG14: Development on Unstable Ground (1990)
PPG15: Planning and the Historic Environment (September 1994, as amended/updated by Circulars 01/2001 and 09/2005)
PPG16: Archaeology and Planning (1990)
PPG17: Planning for Open Space, Sport and Recreation (2002)
PPG19: Outdoor Advertisement Control (1992)
Good Practice Guide on Planning for Tourism (DCLG July 2006) – superseded PPG21 on Tourism from Sept 2006
PPS22: Renewable Energy (August 2004)
PPS23: Planning and Pollution Control (November 2004)
PPG24: Planning and Noise (September 1994)
PPS25: Planning and Flood Risk (December 2006)
Draft National Planning Policy Framework (July 2011)
Circular 05/2005: Planning Obligations (2005)
Thames Corridor Abstraction Management Strategy (Environment Agency, June 2004)
Model Procedures for the Management of Contaminated Land (Contaminated Land Report 11) (Environment Agency, September 2004)
Thames Region Catchment Flood Management Plan (consultation document, Environment Agency, January 2007)
Sustainable Drainage Systems – An Introduction (Environment Agency, May 2003)
Bringing your rivers back to life – A Strategy for restoring rivers in North London (Environment Agency, February 2006)
Guidance on the management of conservation areas (English Heritage, February 2006)
Transport and the historic environment (English Heritage, March 2004)
Streets for All London Manual (English Heritage, March 2000)
Regeneration and the historic environment (English Heritage, January 2005)
Retail Development in Historic Areas (English Heritage, December 2005)
Seeing History in the View: Methodology for assessing the heritage value within views (English Heritage, 2008)
Guidance on Tall Buildings (English Heritage/CABE, 2007)
The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008

A new plan for London: Proposals for the Mayor's London Plan (Mayor of London, 2009)
The Mayor's Transport Strategy (GLA, 2001, as updated)
Cleaning London's Air: The Mayor's Air Quality Strategy (September 2002)
Connecting with London's Nature: The Mayor's Biodiversity Strategy (2002)
Sustaining Success: Economic Development Strategy (2005)
Green Light to Clean Power: The Mayor's Energy Strategy (2004)
Rethinking Rubbish in London: The Mayors Waste Strategy (2003 - under review)
Souder City: The Mayor's Ambient Noise Strategy (March 2004)
London Cultural Capital: The Mayor's Cultural Strategy (April 2004)
Accessible London: Achieving an inclusive environment (GLA 2004)
GLA – Supplementary Planning Guidance (November 2005)
Industrial Capacity SPG (March 2008)
London Office Policy Review 2007
Providing for Children and Young People's Play and Informal Recreation Supplementary Planning Guidance (March 2008)
Geodiversity of London (draft), July 2008
Planning and Equality and Diversity in London (October 2007)
London View Management Framework SPG (July 2007)
London Boroughs Gypsy and Traveller Accommodation Needs Assessment 2008
Camden Together - Camden's Sustainable Community Strategy 2007 - 2012 (2007)
Replacement UDP (adopted June 2006)
Camden Planning Guidance (adopted December 2006)
Housing Strategy 2005-2010 (updated 2007)
Camden Housing Need Study Update, 2008
Camden Neighbourhood Renewal Strategy (2003)
Camden Social Inclusion Strategy (2003)
Tackling Inequality: Camden's Equality Scheme 2006-2009 and Action Plan (2006)
Climate Change in Camden – A Joint Effort: Climate Change Action Plan 2006 – 2009 (2006)
Action for a Sustainable Camden: Camden's Local Agenda 21 Plan (2001)
Camden Air Quality and Action Plan Progress Report
Camden Safe 2008-2011; Camden's Community Safety Partnership Strategy
Enriching Life: Camden's Cultural Strategy (2002)
Camden's Local Implementation Plan 2005/6-2010/11(2006)
Camden's Green Transport Strategy: Taking steps for a people friendly Camden (1997 - currently being updated)
Camden Cycling Plan (2001 - third review 2005)
Camden Walking Plan (second edition, 2006)
Camden's Noise Strategy (2002)
Air Quality Action Plan 2002 and Progress Report 2005
The Camden Biodiversity Action Plan (2002)
Camden's Corporate Sustainable Design and Construction Policy (LBC 2007)
Building Schools for the Future – Indicative Strategy for Change Part 1 (LBC 2007)
Camden's Children and Young People's Plan 2006-2009 (LBC 2006)
An Open Space Strategy for Camden 2006-2011
Camden Open Space, Sport and Recreation Study Review; Atkins; 2008

Camden Statement of Licensing Policy 2008
Let's Talk Rubbish – Camden Waste Strategy 2007 - 2010
Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050; SEA-Renue; 2007
Camden Employment Land Review 2008
Camden Retail Study 2008; Roger Tym and Partners
Hatton Garden Economic Analysis and Action Plan for the Jewellery Sector and Area, April 2004, MCA Regeneration

Appendix C – Core Strategy and Site Allocations DPD Strategic Objectives Appraisal

Theme 1: A sustainable Camden that adapts to a growing population

Draft Strategic Objective	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	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	↑↑	By aiming to manage growth to meet 'our needs for homes', this should result in a large positive impact on the provision of housing.
2. Promote a healthy, safe community	↑	Managing growth to meet our needs and supported by necessary infrastructure, maximising local benefit, will help to achieve this objective and improve health.
3. Access to shops, facilities & open space	↑	Meeting our needs for services and infrastructure would encompass local shopping and community facilities, like open spaces.
4. Tackle poverty & social exclusion	↑	By maximising the benefits of growth for local communities, this would involve tackling local issues, such as deprivation.
5. Sustainable economic growth & employment opportunity	↑↑	Managing growth that meets our needs for jobs and services will help achieve sustainable economic growth and local employment opportunities.
6. Maximise benefits of regeneration	↑↑	By aiming to meet local need and maximise benefits for local areas and the borough the benefits of regeneration will be maximised.
7. Promote high quality sustainable urban design	↔	While maximising local benefits implies that the historic environment would be protected, the need for houses, jobs and services could take priority over high quality sustainable design, where this may make provision of such uses unviable. It will be important that a balance is maintained between the need to provide these essential uses and achieving high quality sustainable design that protects the historic environment.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on private transport	↑	Necessary infrastructure would include adequate facilities for walking and cycling, thereby helping to reduce private vehicle use.
10. Improve amenity,	↑	Maximising local benefits implies minimising local disbenefits (i.e. damage to amenity, noise impact).

minimising noise impact		
11. Water resources & flood risk	↔↑	Although there is no mention of water/flood risk, effective growth management will need to address these matters to meet our local needs.
12. Protect & enhance habitats & biodiversity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
13. Reduce waste	↑	Necessary infrastructure would include waste management facilities.
14. Improve air quality	↑	Maximising local benefits and managing growth imply improving air quality given that this is a specific issue for Camden's future growth.
15. Provide for energy efficiency	↔↑	Managing growth implies the need for energy efficiency. However, meeting our needs for houses, jobs and services may outweigh the priority for energy efficiency over provision.
16. Minimise fossil fuel use, aggregates & non-renewables	↔	It is not clear whether this objective would impact on fossil fuel use, aggregates and non-renewables, but growth could increase the use of these resources.
Overall Social Impact	↑↑	This objective will have a strong and direct positive social impact as it focuses on growth in Camden meeting 'our need' and maximising local benefits.
Overall Environmental Impact	↔	This objective has the potential to have a positive environmental impact, but this is not seen as implicit. It is suggested that the word 'sustainably' could be inserted before 'manage growth', as this would strengthen objective. However, it is also noted that this objective does not necessarily need to address environmental issues in such detail, given that this is addressed by another strategic objective.
Overall Economic Impact	↑↑	This objective will have a strong and direct positive economic impact as it focuses on growth in Camden meeting 'our need' including job and services and maximising local benefits.

Draft Strategic Objective	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	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	↑	Will help to achieve high quality housing development.
2. Promote a healthy, safe community	↑	High quality design and improvements to places and streets will help reduce fear of crime and opportunity for crime.
3. Access to shops, facilities & open space	↑	Physical works to improve our places would include open spaces.

Tackle poverty & social exclusion	↑↑	High quality sustainable design will result in improved access to buildings, places and streets in Camden, as well as improving the urban environment including in deprived areas.
5. Sustainable economic growth & employment opportunity	↑	Improving the design and appearance of places will create a better, more attractive environment and this will help to attract people and business to the area.
6. Maximise benefits of regeneration	↑↑	Improving the quality and sustainability of the physical environment will help to make communities more sustainable.
7. Promote high quality sustainable urban design	↑↑	This strategic objective is very similar to the sustainability objective and both have the same goal.
8. Ensure efficient use of land, buildings & infrastructure	↑	High quality sustainable design will enable maximised densities while minimising detrimental effects of increasing densities.
9. Reduce reliance on private transport	↑	High quality sustainable design and improvements to places and streets will help encourage people to walk and cycle more rather than drive as the pedestrian/cyclist environment will be enhanced.
10. Improve amenity, minimising noise impact	↑	High quality sustainable design will help to ensure that buildings are better designed to mitigate against noise impacts.
11. Water resources & flood risk	↑	Sustainable design includes consideration of water efficiency and flood risk.
12. Protect & enhance habitats & biodiversity	↑↑	Sustainable design would involve incorporating elements to enhance biodiversity (i.e. through green roofs, soft landscaping).
13. Reduce waste	↑	Sustainable design should incorporate waste management.
14. Improve air quality	↑	Designing buildings sustainably (i.e. energy efficiency, use of renewable energy) will help to reduce fossil fuel use thereby helping reduce air pollution.
15. Provide for energy efficiency	↑↑	Promoting sustainable design incorporates energy efficient design.
16. Minimise fossil fuel use, aggregates & non-renewables	↑	Designing buildings sustainably will help to reduce fossil fuel use and also encourage use of renewable energy.
Overall Social	↑↑	Well designed and sustainable places and developments will greatly enhance the urban environment and add to people's

Impact		quality of life.
Overall Environmental Impact	↑↑	Sustainable design is one of the key ways that we can ensure future development impacts positively on the environment and redresses past detrimental impacts where possible.
Overall Economic Impact	↑	Sustainable design and attractive places and streets help create a more appealing urban environment, helping to create vibrant places helping to attract business and visitors to the borough, helping sustain our economy.

Draft Strategic Objective	To make sure development in Camden achieves high environmental standards	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	↑	Ensuring development is of higher environmental standard will help promote high quality housing.
2. Promote a healthy, safe community	↑	Development of higher environmental standards will help to improve the general health of the community.
3. Access to shops, facilities & open space	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
4. Tackle poverty & social exclusion	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
5. Sustainable economic growth & employment opportunity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
6. Maximise benefits of regeneration	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
7. Promote high quality sustainable urban design	↑↑	High environmental standards will incorporate high quality sustainable design and also help to protect the historic environment.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on	↑	To achieve higher environmental standards, consideration would need to be given to the high environmental standards for access to the development (i.e. walking and cycling access over vehicular access).

private transport		
10. Improve amenity, minimising noise impact	↑	Higher environmental standards will include higher amenity standards and minimised noise pollution impacts from or on developments.
11. Water resources & flood risk	↑↑	Water efficiency and flood risk mitigation would form part of higher environmental standards.
12. Protect & enhance habitats & biodiversity	↑↑	Ensuring higher environmental standards would facilitate protection and enhancement of biodiversity.
13. Reduce waste	↑	Waste management forms part of environmental standards for development.
14. Improve air quality	↑↑	Development of higher environmental standards would by its nature help reduce air pollution and improve air quality, otherwise it would not be of the highest environmental standard.
15. Provide for energy efficiency	↑↑	Higher environmental standards would include energy efficient design in order to achieve highest standards.
16. Minimise fossil fuel use, aggregates & non-renewables	↑↑	Development of higher environmental standards would reduce fossil fuel and non-renewables use, otherwise it would not be of the highest environmental standard.
Overall Social Impact	↑	Developments of higher environmental quality will improve the standard of the urban environment and living in Camden.
Overall Environmental Impact	↑↑	Ensuring development of higher environmental standards will have very significant positive impacts on the natural and built environment.
Overall Economic Impact	↑	High environmental standards, while not necessarily having any direct economic impacts, will improve the overall sustainability of the urban environment, thereby helping to improve economic sustainability also through high quality developments, which are therefore more viable. However, there is also the potential that ensuring high environmental standards could impact negatively on economic factors if environmental standards are given far greater weight than economic implications. It will be important to find a balance.

Draft Strategic Objective	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	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	↑↑	This strategic objective seeks to achieve the same outcome as the sustainability objective, so therefore the impact will be very positive.
2. Promote a	↑	Improving housing in the borough will help improve health of residents by providing decent homes of a liveable standard and

healthy, safe community		also may help reduce crime and fear of crime by improving the residential environment.
3. Access to shops, facilities & open space	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
4. Tackle poverty & social exclusion	↑	Provision of affordable housing will help to reduce social exclusion and poverty by improving people's quality of life and helping to improve senses of community.
5. Sustainable economic growth & employment opportunity	↔	Meeting our housing need in terms of the type of properties would include making accommodation for start-up businesses, in the form of, for example, live/work units and home offices. However, there is also the possibility of conflict between protecting employment land and providing land for housing.
6. Maximise benefits of regeneration	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
7. Promote high quality sustainable urban design	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
8. Ensure efficient use of land, buildings & infrastructure	↑	Meeting our housing need will require efficient use of land to meet the high targets set for Camden.
9. Reduce reliance on private transport	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
10. Improve amenity, minimising noise impact	↔	More housing developments in the borough may result indirectly in increased noise impact owing to greater amounts of development, which implies higher densities and therefore more people living closer together. However, this impact could be mitigated through meeting objectives on higher environmental standards, etc.
11. Water resources & flood risk	↔	Increased development could lead to increased flood risk. However, this could be mitigated through higher environmental standards and provision of green landscaping, such as trees, grass and green roofs.
12. Protect & enhance habitats & biodiversity	↔	It is possible that demand to meet our housing needs could result in loss of biodiversity through the demand for land. This would need to be carefully managed to ensure that housing did not result in harm to biodiversity and where possible, new development takes opportunities to improve biodiversity and create additional habitats.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.

15. Provide for energy efficiency	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
Overall Social Impact	↑↑	Meeting our housing needs, especially in terms of affordability will give more people the opportunity to a better quality of life and to be able to remain in Camden rather than having to leave the borough to find housing that they can afford. It will also help to reduce overcrowding problems faced by many in the borough.
Overall Environmental Impact	↑	In order to meet Camden's housing need, efficient use of land and existing buildings will be essential, given the limited amount of available housing land in the borough. New development can also present new opportunities for improving habitats and biodiversity and creating new habitats.
Overall Economic Impact	↑	By providing affordable housing, this will help to reduce social exclusion and poverty.

Draft Strategic Objective	To better plan for and manage our waste, including through working with our partner boroughs in the North London Waste Authority	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
2. Promote a healthy, safe community	↑	By better managing waste, the health of the borough should be improved through better and cleaner waste storage and disposal methods that create fewer emissions and have lesser impacts on amenity.
3. Access to shops, facilities & open space	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
4. Tackle poverty & social exclusion	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
5. Sustainable economic growth & employment opportunity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
6. Maximise benefits of regeneration	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
7. Promote high	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that

quality sustainable urban design		this strategic objective should specifically address it.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on private transport	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
10. Improve amenity, minimising noise impact	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
11. Water resources & flood risk	↑	Waste management encompasses waste water management and by improving it this will improve the efficiency of water use.
12. Protect & enhance habitats & biodiversity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
13. Reduce waste	↑/↔	The objective seeks to manage our waste better, but it does not specifically refer to reducing waste. It is suggested that the strategic objective could be amended to include specific reference to waste reduction.
14. Improve air quality	↑	Better waste management should help to reduce air pollution through more sustainable, environmentally friendly waste disposal techniques.
15. Provide for energy efficiency	↑	In the future, as technology advances, waste materials (i.e. biomass) can be used for energy generation.
16. Minimise fossil fuel use, aggregates & non-renewables	↑	The use of waste materials (i.e. biomass) for energy generation will help to reduce reliance on fossil fuels and non-renewable resources.
Overall Social Impact	↑	Better waste management would have a positive impact on health as pollution associated with waste would be reduced, thereby improving quality of life.
Overall Environmental Impact	↑↑	Better management of waste will have a positive effect on our environment by reducing unsustainable waste management practices, which have in the past had significant detrimental effects on the environment.
Overall Economic Impact	↑	Better waste management and initial planning would result in reduced long-term spending on waste management and disposal, as well as reducing money spent on environmental mitigation on unsustainable waste disposal.

Draft Strategic Objective	To improve and protect Camden's parks and open spaces and promote the diversity of plant and animal species in the borough	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
2. Promote a healthy, safe community	↑	Improvements to open spaces will make them more attractive and safe, thereby encourage their use for outdoor activity, improving people's health and feelings of safety.
3. Access to shops, facilities & open space	↑↑	Access to open space will enhanced through improvements to existing spaces.
4. Tackle poverty & social exclusion	NA	Parks and open space have an important role to play in helping reduce social exclusion as they provide cost-free outdoor recreation for people and offer a pleasant environment for people to meet and socialise.
5. Sustainable economic growth & employment opportunity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
6. Maximise benefits of regeneration	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
7. Promote high quality sustainable urban design	↑↑	Improving parks and promoting biodiversity will help promote sustainable design (i.e. green roofs, soft landscaping).
8. Ensure efficient use of land, buildings & infrastructure	↑	Protecting open spaces will help force more efficient use of land, as open space and green land will not be suitable for development, so the use of other brownfield sites will need to be better utilised.
9. Reduce reliance on private transport	↑	Improving open spaces may help to encourage people to walk and cycle more, owing to a more pleasant pedestrian/cyclist environment.
10. Improve amenity, minimising noise impact	↑↑	Open space, green space and biodiversity can all add to the amenity of an area and can act as buffers between noise producing and noise sensitive uses.
11. Water resources & flood risk	↑↑	Improving and protecting open space and green space and plants will help mitigate against flood risk and the impacts of flooding, as parks and gardens help to allow natural infiltration of water and reduce localised flooding caused by surface runoff from hard surfaces.

12. Protect & enhance habitats & biodiversity	↑↑	Will protect biodiversity, but this objective could be strengthened to mention priority species.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	↑	Open spaces and trees help to absorb air pollutants, improving air quality in the areas around them.
15. Provide for energy efficiency	↑	Open space and green space can act as cool sinks in our warm urban environment, providing relief from the heat for the borough's human population, helping to reduce need to mechanical cooling systems.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
Overall Social Impact	↑↑	Improved open spaces will help enhance people's quality of life, given the positive effects of open space on human mental and physical health.
Overall Environmental Impact	↑↑	Protection of open spaces, green spaces and biodiversity will have very positive environmental impacts, as they form integral parts of our natural environment.
Overall Economic Impact	↑	High quality open spaces and green spaces will enhance the local environment, making the borough more appealing for investment.

Theme 2: A strong Camden economy that includes everyone

Draft Strategic Objective	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	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
2. Promote a healthy, safe community	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
3. Access to shops, facilities & open space	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
4. Tackle poverty & social exclusion	↑↑	Reducing inequalities and increasing opportunities for everyone will directly tackle poverty and social exclusion in Camden.
5. Sustainable economic growth & employment opportunity	↑↑	This will promote sustainable economic growth through seeking jobs and training/education opportunities for all.
6. Maximise benefits of regeneration	↑↑	This will result in increased access to employment opportunities for all, leading to more sustainable communities.
7. Promote high quality sustainable urban design	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on private transport	↑	Ensuring job and education opportunities are available for everyone would imply consideration of people's access requirements regarding transport (i.e. making employment/education opportunities more easily accessible).
10. Improve amenity, minimising noise impact	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.

11. Water resources & flood risk	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
12. Protect & enhance habitats & biodiversity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
15. Provide for energy efficiency	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
Overall Social Impact	↑↑	Improving employment and education opportunities will have a positive social impact, helping to reduce inequalities and enhance the skills base of the local community.
Overall Environmental Impact	↑	A strong economy may help to ensure sufficient funding is potentially available for measures to protect the environment, but there is a need to take care that economic development does not occur to the detriment of the environment.
Overall Economic Impact	↑↑	Reducing inequalities and improving job, training and education opportunities will have a very positive economic impact for Camden, as more local people will be able to actively participate in the economy, reducing unemployment with improved job prospects and income capacity.

Draft Strategic Objective	To support the success of Camden's town and neighbourhood centres while adapting to changes in the economy and shopping habits	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
2. Promote a healthy, safe community	↑	Supporting the success of Camden's centres would involve designing our crime measures, given that crime is one of the threats to our centres, thereby helping to promote safer communities.
3. Access to shops, facilities & open space	↑	Supporting town and neighbourhood centres will help ensure access to local shopping and services, as these would be concentrated in town centres in order to sustain the success of these centres.
4. Tackle poverty	↑	Supporting the success of centres will help tackle poverty by encouraging development in these locations.

& social exclusion		
5. Sustainable economic growth & employment opportunity	↑	Supporting the success of Camden's centres while adapting to change will facilitate sustainable economic growth, as it will be more viable for uses to locate in these centres.
6. Maximise benefits of regeneration	↑	Supporting the success of centres will help encourage sustainable inward investment, as Camden's centres will be more sustainable and viable for prospective businesses.
7. Promote high quality sustainable urban design	↑	Supporting the success of centres will in many cases in Camden require consideration to be given to the historic environment, which often forms a key element of a centre's identity and the success of such centres is dependent on an attractive street environment.
8. Ensure efficient use of land, buildings & infrastructure	↑	Focussing development in existing centres will help facilitate the efficient use of land in these locations.
9. Reduce reliance on private transport	↑	By supporting the success of town centres, this will help to encourage uses in highly accessible location, thereby reducing the need for people to use private transport to access key services and shopping facilities.
10. Improve amenity, minimising noise impact	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
11. Water resources & flood risk	↑	The implication of adapting to change is that the continued success of Camden's centres with the predicted effects of climate change will depend upon mitigation of flood risk and optimising water use.
12. Protect & enhance habitats & biodiversity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
15. Provide for energy efficiency	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.

Overall Social Impact	↑↑	Supporting Camden's centres will help improve social cohesion, as well as improving quality of life for those who live, and work in and visit the centres.
Overall Environmental Impact	↑	Concentrating development in existing centres will help restrict out-of-centre development, which can encourage car use and are unsustainable.
Overall Economic Impact	↑↑	This objective will have significant positive economic impacts for Camden, as the success of Camden's town centres is an important part of the borough's economic success.

Theme 3: A connected Camden community where people lead active, healthy lives

Draft Strategic Objective	To promote the high levels of amenity and quality of life that make Camden such a popular place to live	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	↑	Promoting high levels of amenity and quality of life would include high quality affordable homes, as housing is a key element of quality of life.
2. Promote a healthy, safe community	↑	High levels of amenity and quality of life will result in a healthy and safer community.
3. Access to shops, facilities & open space	↑	High levels of amenity would include good access to local shops, services, community facilities and open spaces.
4. Tackle poverty & social exclusion	↑	Promoting quality of life will involve tackling poverty and social exclusion as these impair quality of life.
5. Sustainable economic growth & employment opportunity	↑	High levels of quality of life would include employment opportunities and help sustain a successful economy.
6. Maximise benefits of regeneration	↑	High levels of amenity and quality of life will help sustain communities and maximise regeneration benefits.
7. Promote high quality sustainable urban design	↑	Promoting a high quality of life will require protection of Camden's environment, as the state of the local environment is a key indicator of quality of life.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on private transport	↑	High levels of amenity would imply good public transport, walking and cycling access.
10. Improve amenity, minimising noise impact	↑↑	Promoting high levels of amenity will incorporate minimising noise impact, which can be very detrimental to amenity and quality of life.
11. Water	↑	Promoting high quality of life will include protecting water resources and mitigating flood risk, as both of these can affect

resources & flood risk		quality of life.
12. Protect & enhance habitats & biodiversity	↑	High levels of amenity and quality of life will require open spaces and biodiversity as these improve the urban environment and enhance quality of life.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	↑	Promoting high levels of amenity and quality of life will imply improved air quality, as this can significantly affect quality of life.
15. Provide for energy efficiency	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
Overall Social Impact	↑↑	Promoting high levels of amenity and quality of life will have significant positive social effects, improving the lives of Camden's residents, workers and visitors.
Overall Environmental Impact	↑	This objective will have positive environmental impacts as amenity and quality of life are dependent on a high quality environment.
Overall Economic Impact	↑↑	Promoting high quality of life will have positive impacts on Camden's economy, as quality of life is dependent to some degree of financial well being.

Draft Strategic Objective	To secure mixed, balanced areas with a sense of community and avoid polarisation throughout the borough and promote equality of opportunity	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
2. Promote a healthy, safe community	↑	Mixed, balanced areas avoiding polarisation will help to enhance community safety as people will not tend to feel excluded but more a part of the community and therefore less likely to commit crime against other members of their community.
3. Access to shops, facilities & open space	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
4. Tackle poverty & social exclusion	↑↑	Avoiding polarisation will help to tackle social exclusion by reducing the gap between people of different socio-economic status.

5. Sustainable economic growth & employment opportunity	↑	Avoiding polarisation would help to create more sustainable economic growth.
6. Maximise benefits of regeneration	↑↑	Mixed balanced areas with senses of community will promote sustainable communities, as people will feel more involved in their community and therefore more concerned with its future.
7. Promote high quality sustainable urban design	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on private transport	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
10. Improve amenity, minimising noise impact	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
11. Water resources & flood risk	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
12. Protect & enhance habitats & biodiversity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
15. Provide for energy efficiency	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
Overall Social Impact	↑↑	Polarisation is a key issue for many parts of Camden and this objective will have a very positive impact by avoiding this in securing more united sustainable communities.

Overall Environmental Impact	↑	An improved sense of community will in turn have positive impacts on the environment as people will have more of a sense of concern and ownership for their local area.
Overall Economic Impact	↑↑	Avoiding polarisation will help strengthen Camden's economy and ensure it is more sustainable.

Draft Strategic Objective	To support improvements to the health and well being of Camden's population	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	NA	Supporting improvements to health and well being will help achieve this objective as housing is considered one the determinants of health.
2. Promote a healthy, safe community	↑↑	By supporting improvements to the health and well being of Camden's population, a healthy community will be promoted.
3. Access to shops, facilities & open space	↑	Improvements to health and well being would include improvements to open spaces, etc.
4. Tackle poverty & social exclusion	↑	By improving health and well being, social exclusion and poverty can be reduced as people will have better access to health facilities.
5. Sustainable economic growth & employment opportunity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
6. Maximise benefits of regeneration	↑	Improving Camden's health and well being will involve maximising the regeneration benefits of new development.
7. Promote high quality sustainable urban design	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on private transport	↑	Improving out health and well being would include walking and cycling, therefore helping to reduce dependence on private motor vehicles.

10. Improve amenity, minimising noise impact	↑	Improvements to well being would include minimising noise impact, as this can significantly affect people's sense of well being and health.
11. Water resources & flood risk	↑	Water resources are important to high quality health so the implication of this objective would include protection of these.
12. Protect & enhance habitats & biodiversity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	↑	Supporting improvement to health will include measures to improve air quality, which can significantly affect health.
15. Provide for energy efficiency	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
Overall Social Impact	↑↑	This objective will have a significant positive social impact, improving the health and well being of Camden population.
Overall Environmental Impact	↑	Supporting improvement to health and well being will indirectly have a positive environmental impact, as the quality of the environment is a key determinant of health and well being and improvements to the environment will be necessary to achieve this.
Overall Economic Impact	↑	This objective will have positive overall economic impacts as improving health and well being will help to reduce socio-economic exclusion.

Draft Strategic Objective	To reduce congestion and pollution in the borough by encouraging more walking and cycling and less motor traffic	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
2. Promote a healthy, safe community	↑↑	Encouraging walking and cycling will help promote health living and therefore a healthier community.
3. Access to	↑↑	Encouraging less motor traffic and more walking and cycling will encourage services to locate in better proximity to public

shops, facilities & open space		transport and walking and cycling routes.
4. Tackle poverty & social exclusion	↑	Encouraging walking and cycling will to some extent help to tackle social exclusion as both are relatively cost-free modes of transport and improving conditions for these modes will likely allow those without access to private vehicles and also wheelchair/mobility-impaired pedestrian routes, better access to their local areas.
5. Sustainable economic growth & employment opportunity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
6. Maximise benefits of regeneration	↑	Reducing car use and encouraging more walking and cycling will promote a more sustainable community.
7. Promote high quality sustainable urban design	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
8. Ensure efficient use of land, buildings & infrastructure	↑	Encouraging more walking and cycling and less motor traffic will encourage higher density development, which is easily locally accessible rather than sprawl, which encourages access by private motor vehicle.
9. Reduce reliance on private transport	↑↑	By encouraging less motor traffic and more walking and cycling, this will help to reduce reliance on private motor vehicle transport modes. Though perhaps this could be strengthened by replacing the word encouraging with requiring.
10. Improve amenity, minimising noise impact	↑	Reducing pollution associated with motor traffic will help to reduce associated noise impacts.
11. Water resources & flood risk	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
12. Protect & enhance habitats & biodiversity	↑	Encouraging walking and cycling will potentially help protect habitats and biodiversity and reduce the impact on these from cars, as walking and cycling are less invasive and do not tend to pollute the natural environment.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	↑↑	Encouraging less motor traffic will improve air quality, as vehicle emissions are some of the key sources of air pollution in Camden.
15. Provide for energy efficiency	↑	Reducing motor vehicle traffic will help reduce fuel consumption, as fewer people will be driving.
16. Minimise fossil fuel use,	↑	Reducing motor vehicle traffic will help reduce fossil fuel consumption as fewer people will be driving vehicles that require fossil fuel power,

aggregates & non-renewables		
Overall Social Impact	↑↑	Encouraging more walking and cycling will help improve the health of Camden's residents, as well as encouraging a better sense of community as walking and cycling offer greater opportunities to interact with other people than private car travel.
Overall Environmental Impact	↑↑	Car traffic is one of the major causes of pollution and reducing traffic, and thereby the associated pollution congestion, will improve the quality of Camden's environment.
Overall Economic Impact	↑	By encouraging less motor traffic and more walking and cycling, this will help improve economic efficiency as the business time wasted whilst people are stuck in traffic will be reduced and reduced congestion will allow the more efficient movement of people and goods.

Theme 4: A safe Camden that is part of our vibrant world city

Draft Strategic Objective	To support the borough's valuable contribution to London's regional, national and international role and make sure that this brings benefits to the borough and its residents	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	↑	Ensuring Camden's role in London benefits its residents would include ensuring housing need of the borough's residents is met.
2. Promote a healthy, safe community	↑	Supporting Camden's role in London so that it benefits Camden would imply a high quality and safe environment in order to achieve local benefits.
3. Access to shops, facilities & open space	↑	Ensuring Camden benefits from the borough's contribution to London implies local access to facilities of London-wide and/or national importance.
4. Tackle poverty & social exclusion	↑	This objective will help create opportunities for Camden residents as it seeks to ensure that Camden benefits from its contribution to London's roles.
5. Sustainable economic growth & employment opportunity	↑	Supporting Camden's contribution to London will help strengthen the local economy.
6. Maximise benefits of regeneration	↑	This objective seeks to ensure that Camden benefits from its contribution to London's roles, thereby maximising the benefits of any regeneration.
7. Promote high quality sustainable urban design	↑	Part of Camden's contribution to London is its historic environment and supporting this help achieve this sustainability objective.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on private transport	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
10. Improve amenity, minimising noise impact	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
11. Water	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that

resources & flood risk		this strategic objective should specifically address it.
12. Protect & enhance habitats & biodiversity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
15. Provide for energy efficiency	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
Overall Social Impact	↑↑	This objective should have positive social impacts as it aims to ensure Camden residents benefit from the borough's contribution to London roles.
Overall Environmental Impact	↑	Supporting the borough's contribution will incorporate supporting protection and enhancement of all elements of Camden's environment that contribute to London, including its buildings and places of regional, national and international historic significance and its natural environment in the form of parks and Metropolitan Open Space and nature conservation sites.
Overall Economic Impact	↑	Supporting the borough's contribution to London's roles will have positive economic impacts as the borough's economy will be strengthened by its links to London as a city of regional, national and international importance.

Draft Strategic Objective	To promote the safety and security of those who live in, work in and visit Camden, while maintaining the borough's vibrancy	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	↑	Promoting safety and security and vibrancy will help improve the quality of housing.
2. Promote a healthy, safe community	↑↑	This objective will help reduce fear of crime and crime as it focuses specifically on promoting safety and security.
3. Access to shops, facilities & open space	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
4. Tackle poverty & social exclusion	↑	Improving community safety and security will help improve quality of life and reduce social exclusion as people will feel safer in their communities.

5. Sustainable economic growth & employment opportunity	↑	Camden's vibrancy depends in part on its thriving local economies.
6. Maximise benefits of regeneration	↑	A sustainable community needs to be safe and vibrant.
7. Promote high quality sustainable urban design	↑	Promoting safety and maintaining vibrancy will require protection and enhancement of existing townscape features and improve the design quality of development.
8. Ensure efficient use of land, buildings & infrastructure	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
9. Reduce reliance on private transport	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
10. Improve amenity, minimising noise impact	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
11. Water resources & flood risk	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
12. Protect & enhance habitats & biodiversity	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
13. Reduce waste	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
14. Improve air quality	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
15. Provide for energy efficiency	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
16. Minimise fossil fuel use, aggregates & non-renewables	NA	No relationship. This is addressed by other draft strategic objectives and it is not considered necessary or appropriate that this strategic objective should specifically address it.
Overall Social Impact	↑↑	Safety and security are key concerns for a sustainable community and promoting these will have very positive social implications, strengthening sense of community.

Overall Environmental Impact	↑↑	Safety and security are key elements of the quality of an environment so therefore this objective will have significant positive environmental impacts.
Overall Economic Impact	↑	Better safety and security will help make Camden a place people want to visit and work in, and this will help maintain the economy.

Camden Site Allocations - Sustainability Appraisal

Site no.	Site name	Site size	PTAL	Growth area	Strategic view	Open space	MOL	Met Walk	Met Walk 30m buffer	Green corridor	Canal	Transport proposal	Clear zone	Central London	Town Centre	N'hood centre	C London frontage	Kentish town	Industry Area	Hatton Garden	Conservation Area	Positive contributor	Negative contributor	TPO	Listed buildings	Ancient monument	Arch. Priority area	Flood st twoce 30m buffer	Waste safeguard	Agg safeguard
14	Westminster Kingsway College, Regent's Park Centre, Longford Street	2,380	6b		Y							Y	Y																	
15	Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East/Augustus St	3,110	3-4		Y							Y								Y			Y							
16	St Giles Circus / Denmark Place	18,800	6b	Y								Y	Y	Y			Y			Y				Y		Y				
17	6-17 Tottenham Court Road	1,925	6b	Y								Y	Y	Y			Y			Y										
18	The Royal Mail Sorting Office, 21-31 New Oxford Street	3,964	6b	Y				Y				Y	Y	Y												Y				
19	Land Bound by New Oxford Street, Museum Street and West Central Street	1,362	6b	Y				Y				Y	Y							Y				Y		Y				
20	12-42 Southampton Row & 1-4 Red Lion Square	4,500	6b	Y				Y				Y	Y	Y						Y				Y		Y				
21	Land Bounded by 50-57 High Holborn, 18-25 Hand Court , 45-51 Bedford Row & Brownlow Street	3,700	6b	Y	Y			Y				Y	Y			Y				Y				Y		Y				
22	Middlesex Hospital Annex, Cleveland Street	3,000	6b		Y							Y	Y							Y										
23	Arthur Stanley House, 44-50 Tottenham Street	1,060	6b		Y							Y	Y							Y										
24	Grafton Way, Odeon Cinema Site	2,240	6b		Y							Y	Y			Y														

Camden Site Allocations - Sustainability Appraisal

Site no.	Site name	Site size	PTAL	Growth area	Strategic view	Open space	MOL	Met Walk	Met Walk 30m buffer	Green corridor	Canal	Transport proposal	Clear zone	Central London	Town Centre	N'hood centre	C London frontage	Kentish town	Industry Area	Hatton Garden	Conservation Area	Positive contributor	Negative contributor	TPO	Listed buildings	Ancient monument	Arch. Priority area	Flood st twoce 30m buffer	Waste safeguard	Agg safeguard	
25	Senate House (north block) Malet Street	1,220	6b									Y	Y								Y			Y							
26	26 Gordon Square and 15 Gordon Street	945	6b		Y						Y	Y	Y								Y										
27	20-22 Gordon Street	1,985	6b		Y							Y	Y								Y		Y								
28	Phoenix Place	11,730	6a		Y							Y	Y								Y			Y		Y					
29	Herbal House, 10 Back Hill	1,820	6b		Y							Y	Y								Y			Y		Y					
30	Land bound by Wren Street, Pakenham Street, Cubit Street, Langton Walk	4,600	6a		Y							Y	Y																		
31	187-199 West End Lane	9,420	6a	Y		Y									Y																
32	156 West End Lane	6,000	6a	Y		Y									Y						Y					Y	Y				
33	O2 Centre Car park	13,500	4-5	Y											Y																
34	100 Avenue Road, Swiss Cottage	4,100	6a-6b			Y																		Y							
35	Belsize Road Car Park	4,490	5-6																		Y					Y	Y				
36	Hawley Wharf and 39-45 Kentish Town Road	16,800	6a		Y	Y		Y	Y						Y		Y				Y	Y		Y		Y					
37	202-212 Regents Park Road (Roundhouse car park)	3,280	4-5												Y						Y			Y		Y					
38	2-12 Harmood Street and Rear of 34 Chalk Farm Road	1,200	5		Y*										Y		Y				Y										
39	Bangor Wharf, Georgiana Street	1,810	6a					Y	Y												Y										

Site no.	Site name	Site size	PTAL	Growth area	Strategic view	Open space	MOL	Met Walk	Met Walk 30m buffer	Green corridor	Canal	Transport proposal	Clear zone	Central London	Town Centre	N'hood centre	C London frontage	Kentish town	Industry Area	Hatton Garden	Conservation Area	Positive contributor	Negative contributor	TPO	Listed buildings	Ancient monument	Arch. Priority area	Flood st twoce 30m buffer	Waste safeguard	Agg safeguard
40	57 - 71 Pratt Street, 10 - 15 Georgiana Street And Royal College Street	4,125	6a																					Y						
41	24 - 58 Royal College Street	14,960	5/6																	Y				y						
42	115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery	7,565	3		Y *	Y		Y	Y															Y						
43	19-37 Highgate Road, Day Centre and 25 and 37 Greenwood Place	5100	4/5		Y												Y	Y						Y		Y				
44	Kentish Town Police Station, 10A,12A, 14 Holmes Road	2,340	5		Y *																			Y		Y				
45	20 Highgate Road	1,980	5		Y																					Y				
46	Former Nurses Hostel, 29 New End	1,665	3			Y														Y				Y		Y				
47	40-49 St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir	4,000	1b			Y	Y																							

* Adjacent to viewing corridor

Appendix E - Selection of sites

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.

A list of sites that were excluded from the Site allocations DPD, and the reasons why those sites have not been taken forward has been prepared and will be included within the submission documents.

Appendix F - Appraisal of alternative land uses for each site

The approach taken to the land uses on individual sites was taken within the parameters of the policies set out in the Camden Core Strategy and Development Policies DPDs, which have themselves been subject to sustainability appraisal. However, the table below provides a brief assessment of alternative land uses for each site and their overall performance in sustainability terms.

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
King's Cross area						
1	King's Cross Central	↑↑	↑	↑		Mixed uses including housing and employment uses as well as a range of other uses (including community uses) are approved as part of the outline planning permission for the site. A mix of uses would allow the site to meet a range of needs and make the most of this highly accessible, under-used site.
2	Camden Town Hall Extension	↑↑	↑	↑	Council facilities: 0 Library: 0	Mixed use or commercial/ employment led development would make the best use of this given its excellent transport links, its position in the Kings Cross/ Euston Road Central London Frontage and potential noise issues associated with Euston Road. This would be subject to provision of council facilities and library elsewhere. Continued use for council facilities and library would have a neutral impact. Provision of housing as part of a mix of uses could deliver benefits through provision of new homes, although given its commercial location, a focus on employment/ commercial development would be appropriate.
3	Lighthouse block, Pentonville Rd	↑↑	↓	↑↑		Mixed commercial uses would bring this site into use and contribute to the vitality and vibrancy of the area. Residential use would raise amenity issues due to the 'island' location of the site between three busy gyratory roads.
4	277a Grays Inn Road	↑↑	↑?	0		Housing led development would contribute to the delivery of Camden's priority land use, although would

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
						not allow the site to retain employment uses on the site – re-provision of such use on the site or elsewhere would be needed to ensure compliance with policy DP13. Employment led development without scope for residential development would not allow the site to provide new housing, which is the priority land use for Camden under policy CS6.
5	Midland Road Site, land rear of British Library	↑↑	↑	↑	Operational needs of British Library: ↑↑ Cultural uses: ↑	Mixed uses would allow optimum use of this central site, whilst development to meet the operational needs of the British Library/ cultural uses would provide wider community benefit. Housing led or employment led development would deliver benefits in terms of new homes/ jobs, but would not make the most of the Central London location of this site. Mixed uses would deliver maximum benefits by addressing all of the opportunities above.
6	4 St Pancras Way (St Pancras Hospital)	↑	↑?	?	Continued medical use: ↑	Employment or housing development could deliver benefits in terms of providing new jobs and homes to meet needs. However, such provision without re-provision of the existing health care facilities (either on site or the assurance of off-site re-provision) could have a negative impact through loss of medical facilities. Mixed uses allowing for retention of medical uses as appropriate is therefore considered most appropriate.
7	103 Camley Street	↑↑	↑?	↑?	Student housing: ↓ Business start up units: ↑↓	Housing led development could provide benefits in terms of housing delivery, but this would be reliant on a robust justification regarding any loss of employment uses on the site. Mixed use development could allow re-provision of employment uses as appropriate, as well as housing and other uses (e.g. community uses) as appropriate. Student housing would result in the loss of employment uses and reduce the amount of permanent housing that would be deliverable on the site. The council's

	Site	Mixed use	Housing	Employment/commercial	Other options considered	Comments
						preference if for housing and employment uses, which are considered to deliver greater benefits. Business start up units could deliver some benefits through promoting economic growth and helping emerging businesses establish themselves. However, such units are not considered to be equivalent to the current employment use on the site, which is protected under policy DP13. Therefore start up units should be provided as part of a mix of units that addresses Camden's priorities, including those set out in policies CS6 and DP13.
8	Land west of Westminster Kingsway College, 45 Sidmouth Street	↓	↑↑	↓		The site forms part of a wider mixed education/residential scheme, and forms the residential component of that scheme. Mixed use or employment/commercial led development would result in the loss of the potential of the site for residential uses, for which planning permission has been granted. Given that this site is considered to be suitable for housing, Camden's priority land use, these alternatives are not considered to be appropriate.
Euston area						
9	Euston Station, Euston Road	↑↑	↑?	?		Whilst housing development would generate benefits by delivering new homes, Camden's priority land use, this would fail to contribute to the jobs target in the London Plan, would not take advantage of the Central London location of the site nor fully utilise its excellent transport links. There may also be issues in some parts of the site in relation to noise from the railway. Commercial/employment development would fail to take the opportunity to deliver significant housing as part of a mix of uses, and would conflict with the need to achieve housing targets for the Euston area set out in the London Plan.
10	BHS Warehouse, 132-	↑↑	↑↓	0	Hotel: ↑↓	Housing development would provide much needed

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
	140 and 142 Hampstead Rd				Student housing: ↑↓ Healthcare: ↑↓	housing but would also result in the loss of employment uses, which would conflict with policy DP13. Continuation of employment/ commercial uses would have a neutral impact. A mix of uses, including employment, residential and other uses as appropriate would ensure compliance with the approach set out in policies DP1 and DP13. Student housing, healthcare or hotel uses would result in the loss of employment uses and reduce the amount of permanent housing that would be deliverable on the site. The council's preference is for mixed development with the predominant uses to be housing and employment uses, which are considered to deliver greater benefits. Other alternative could also be provided as part of the mix provided on site.
11	Granby Terrace	↑↑	↑↓	0		Provision of housing alone would provide much needed housing but may conflict with policy DP13 through loss of employment land. Continued employment use would have a neutral impact, and would fail to deliver new housing. Mixed use development would allow re-provision of employment space as well as new housing (Camden's priority land use), thus making best use of the site.
12	110-122 Hampstead Road (Former National Temperance Hospital)	↑	↑↑	↓		Provision of employment uses on the site would fail to allow the site to maximise its potential for housing, Camden's priority land use, and would conflict with policy DP15 which states that affordable housing is the preferred use where community facilities are no longer needed. Mixed use development would not allow maximum housing provision on the site, although it may allow provision of replacement community uses on the site.
13	1-39 Drummond	↑↑	↓↑	0	School	Housing development would provide much needed

	Site	Mixed use	Housing	Employment/commercial	Other options considered	Comments
	Crescent (Euston Traffic Garage)				development: ↑↑	housing but result in the loss of employment uses on the site, contrary to policy DP13. Whilst more intensive employment use would provide more jobs, this would not deliver any housing (Camden's priority land use) and thus may not comply with policy DP1. Mixed uses would make the most of this Central London site, allowing re-provision of employment uses as well as providing housing. School development would also provide benefits by providing a new community facility to meet needs and support growth.
14	Westminster Kingsway College, Regent's Park Centre, Longford Street	↑	↑↑	↓	Continued education use: 0	Residential development would allow the site to maximise new homes, Camden's priority land use under policy CS6. This would generate a positive impact, subject to satisfactory provision of education uses elsewhere. Mixed use would allow some residential provision, whilst employment use would fail to deliver Camden's priority land use.
15	Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East/Augustus St	↑	↑↑	↓	Hostel: 0 Community use: 0	Retention of hostel uses on the site would have neutral impact. Residential development would allow the site to maximise new homes, Camden's priority land use under policy CS6. This would generate a positive impact, subject to a case being made regarding the loss of hostel accommodation. Redevelopment for housing would also require the re-provision/ expansion of existing community uses and new open space. Provision of employment use would fail to deliver housing, Camden's priority land use and thus would fail to reflect Camden's priorities.
Tottenham Court Road						
16	St Giles Circus	↑↑	↑↓	↓		Mixed use development on this would allow the re-provision of employment, residential, retail and other uses on the site, whilst significantly enhancing the public realm and reflecting the dynamic environment in

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
						which the site is located. Development for single uses, such as residential or employment uses would fail to reflect the location of the development within Central London, including its Central London Frontage. They would also lead to the loss of existing employment or housing uses on the site, contrary to policies DP13, CS6 and DP1.
17	6-17 Tottenham Court Road and 5, 6 & 12 Hanway Place	↑↑	↑↓	↑↓		Housing development would entail the loss of offices in a Central London location (which may conflict with the London Plan) as well as retail on a Central London Frontage. Employment/ commercial redevelopment on its own would fail to provide housing on the site, and thus may conflict with policy DP1. Mixed use development would reflect the Central London location of the site, and ensure continued provision of retail and employment uses as appropriate, as well as new homes.
18	The Royal Mail Sorting Office, 21-31 New Oxford Street	↑↑	↑↓	↑↓		Development other than for mixed uses would fail to take advantage of the Central London location of this site. Employment/ commercial development without housing provision would be fail to comply with policies DP1 and CS6. Residential use without employment/ commercial uses would fail to reflect the Central London location adjacent to New Oxford Street, which has a strong commercial character, and would not reflect the principles established in CS9.
19	Land Bound by New Oxford Street, Museum Street and West Central Street	↑↑	↑↓	↑↓		Mixed use development on this would allow the re-provision and expansion of office, residential and retail uses on the site, whilst enhancing the public realm and reflecting the dynamic environment in which the site is located. Development for single uses, such as residential or employment uses would fail to reflect the location of the development within Central London, including its location next to New Oxford Street, which is

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
						predominantly commercial in nature. Single use development would also lead to the loss of existing employment or housing uses on the site, contrary to policies DP13, CS6 and DP1.
Holborn area						
20	12-42 Southampton Row & 1-4 Red Lion Square	↑↑	↑↓	↑↓	Hotel (part of mixed uses): ↑	Mixed use development would make the best use of this Central London site, adding to the vibrancy of the area by introducing a range of activity. Single use housing or residential would bring some benefits through provision of new homes or jobs, but would not reflect or take advantage of the location of the site and would not reflect the spirit of policy CS9. A hotel as part of a mix of uses would add to the vibrancy of the mix of uses provided and reflect policy CS9 (b), although a hotel as a sole use on the site would not comply with policy DP1 and would not represent the most effective use of the site.
21	Land Bounded by 50-57 High Holborn, 18-25 Hand Court , 45-51 Bedford Row & Brownlow Street	↑↑	↑↓	↑↓		Mixed use development on this would allow the re-provision mixed uses on the site, whilst enhancing the public realm. Development for single uses, such as residential or employment uses would fail to reflect the location of the development within Central London, including its location next to New Oxford Street, which is predominantly commercial in nature. Single use development would also lead to the loss of existing employment or housing uses on the site, contrary to policies DP13, CS6 and DP1.
Highly accessible areas: Bloomsbury Fitzrovia area						
22	Middlesex Hospital Annex, Cleveland Street	↑	↑↑	0		This site is intended to provide for the affordable housing obligations of the NHS Trust that were generated by a number of related development schemes. Maximisation of residential on this site plays is therefore considered to be appropriate as part of the

	Site	Mixed use	Housing	Employment/commercial	Other options considered	Comments
						wider approach to a number of schemes in the area. Provision of employment uses on the site would fail to allow the site to maximise its potential for housing. Mixed use development would not allow maximum housing provision on the site.
23	Arthur Stanley House, 44-50 Tottenham Street	↑↑	↑	0		Housing development would provide the benefit of contributing towards housing needs. However, this approach would fail to take advantage of the potential to re-provide employment uses on the site, which formed part of the previous hospital use. Employment use would provide new jobs but would not comply with policy DP1 by failing to provide residential. A mix including significant residential is therefore considered to be appropriate.
24	Grafton Way, Odeon Cinema Site	↑↑	↑	0	Medical use: ↑↑	If the site is needed for medical purposes, the site would generate significant benefits for the community by allowing for the provision of significant new health and medical related facilities. If the site is not needed for medical purposes, then a mix of uses would make the most effective use of the site, responding to the principles established in CS9 and DP1.
25	Senate House (north block) Malet Street	↑	↑	0	University/education/community: ↑↑	Mixed use development would allow more effective use to be made of a currently vacant site, although sole uses would not fully reflect the emphasis on the mix of uses that are focussed in Central London. The provision of university, education or community uses would provide benefit to the local area, and would be highly appropriate given the location of the site within a cluster of institutional uses. Employment use would fail to take advantage of the location of the site in an area suitable for institutional uses, or for the provision of housing, Camden's priority land use.

	Site	Mixed use	Housing	Employment/commercial	Other options considered	Comments
26	26 Gordon Square and 15 Gordon Street	↑	↑	0	University use: ↑ Student accommodation: ↑	A mix of uses including housing would make effective use of the site. University uses would also be appropriate to this location, potentially as part of a mix of uses with housing. Employment use would fail to take advantage of the location of the site in an area suitable for institutional uses, of for the provision of housing, Camden's priority land use. Student accommodation may be appropriate on this site, although consideration would need to be given to housing, Camden's priority land use.
27	20-22 Gordon Street	↑	↑	0	University uses: ↑ Student accommodation: ↑?	A mix of uses including housing would make effective use of the site. University uses would also be appropriate to this location, potentially as part of a mix of uses with housing, Camden's priority land use. Employment use would fail to take advantage of the location of the site in an area suitable for institutional uses, of for the provision of housing, Camden's priority land use. Student accommodation may be appropriate on this site, although consideration would need to be given to housing, Camden's priority land use.
Farringdon area						
28	Phoenix Place	↑↑	↑↓	0		Housing development provide much needed housing but would mean the loss of existing employment uses, contrary to policy DP13. Retention of employment uses on the site would have a neutral impact, as it would continue existing uses but would fail to provide new housing (Camden's priority land use). Mixed use development provides the potential to retain employment uses and deliver new housing as part of a mix that is appropriate to the Central London location of the site.
29	Herbal House, 10 Back	↑↑	↑	0	Continued	Housing development would provide the benefit of

	Site	Mixed use	Housing	Employment/commercial	Other options considered	Comments
	Hill				education use: 0	contributing towards housing needs. However, this approach would fail to take advantage of the central London location of the site and would not respond fully to the principles set out in policy CS9, which underlines the role of Central London as a focus for a variety of functions. Employment use would provide continue to provide employment on the site but would not reflect the principles of policy DP1 by failing to provide residential development. It is considered that a vibrant mix of uses, including residential, would be appropriate on the site.
30	Land bound by Wren Street, Pakenham Street, Cubit Street, Langton Walk	↑↑	↑↓	0	Education: ↑	Housing development would provide much needed housing but mean the loss of existing employment uses, contrary to policy DP13. Retention of employment uses on the site would have a neutral impact, as it would continue existing uses but would fail to provide new housing (Camden's priority land use). Mixed use development provides the potential to retain employment uses and deliver new housing as part of a mix of uses. The provision of education use on the site may result in the loss of employment uses, which would be contrary to policy DP13. However, due to the extreme short supply of potential sites for new schools in the area, the emphasis placed on the provision of community facilities in the LDF, including in Appendix 1 of the Core Strategy, which specifically refers to this site as a possible site for a new school, it is considered that any harm would be outweighed by the long term benefits of new education provision in the borough, should the need be identified.
West Hampstead and Swiss Cottage area						
31	187-199 West End Lane	↑↑	↑↓	0	Student housing: ↓	Residential development would introduce new homes (Camden's priority land use) but would fail to provide appropriate uses along the Town Centre frontage on

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
						<p>West End Lane, contrary to policy DP12. Commercial/ employment uses would deliver new jobs and commercial premises along West End Lane, but would fail to take advantage of the potential of the site to also provide an element of housing to meet targets for the growth area. Mixed use development would therefore address all of the above points.</p> <p>Student housing would result reduce the amount of permanent housing that would be deliverable on the site.</p> <p>The council's preference if for mixed development with the predominant uses to be housing, retail and employment uses, which are considered to deliver greater benefits and reflect Camden's priorities. Other alternative could also be provided as part of the mix provided on site.</p>
32	156 West End Lane	↑↑	↑↓	0		<p>Residential development would introduce new homes (Camden's priority land use) but would fail to provide appropriate uses along the Town Centre frontage on West End Lane contrary to policy DP12 or to re-provide existing employment uses, contrary to policy DP13. Commercial/ employment uses would deliver replacement employment uses and new commercial premises along West End Lane, but would fail to take advantage of the potential of the site to also provide an element of housing to meet targets for the growth area. Mixed use development would therefore address all o the above points.</p>
33	O2 Centre Car park	↑↑	↑↓	↑↓		<p>Residential development would introduce new homes (Camden's priority land use) but would fail to provide town centre uses appropriate to the Town Centre designation of the site, contrary to PPS4 and DP12. Commercial/ employment uses would deliver replacement town centre uses appropriate to a town</p>

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
						centre location, but would fail to take advantage of the potential of the site to also provide an element of housing to meet targets for the growth area. Mixed use development would therefore address all o the above points.
34	100 Avenue Road, Swiss Cottage	↑↑	↑↓	0	Hotel/ apart uses: ↑↓	Housing development would mean the loss of existing employment uses, contrary to policy DP13. Retention of employment uses on the site would have a neutral impact, as it would continue existing uses but would fail to provide new housing (Camden's priority land use). Mixed use development provides the potential to retain employment uses and deliver new housing and town centre uses at ground floor level appropriate to the town centre location of the site. Hotel/ apart uses would be appropriate as part of a mix of uses, as they are town centre uses and would add to the vitality and vibrancy of the site and wider area. However, such uses on their own would fail to provide new housing and would result in the loss of employment uses. However as part of a mix of uses they could have a positive effect.
35	Belsize Road Car Park	↑↑	↑↓	0		Housing development would provide much needed housing but without any employment provision would mean the loss of existing employment uses, contrary to policy DP13. Retention of employment uses on the site would have a neutral impact, as it would continue existing uses but would fail to provide new housing (Camden's priority land use). Mixed use development provides the potential to retain some employment uses and deliver new housing.
Highly accessible areas: Camden Town and Surrounds						
36	Hawley Wharf and 39-45 Kentish Town Road	↑↑	↑↓	↓		Mixed uses including housing and commercial uses as well as a range of other uses (including community uses) would make most effective use of this large site,

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
						which is located in a transition position between the town centre, employment uses and residential areas. A mix of uses would allow the site to meet a range of needs and make the most of this highly accessible, under-used site. Single use development of the site would fail to make the most of its potential
37	202-212 Regents Park Road (Roundhouse car park)	↑↑	↑	↑	Cultural uses: ↑	Employment or residential use would make better use of an under-utilised site, but would fail to take advantage of its key location, with the potential for a cultural element to a vibrant mixture of uses adjacent to the famous roundhouse. Mixed use including workshop space, housing and cultural uses is therefore considered more appropriate.
38	2-12 Harmond Street and Rear of 34 Chalk Farm Road	↑	↑	↑		Mixed use or employment uses would allow better use to be made of this currently vacant site. An Inspector's report has also concluded that other uses could be considered on the site. As the site is considered to be suitable for housing, Camden's priority land use, this is considered to be an appropriate use for the site.
39	Bangor Wharf, Georgiana Street	↑↑	↑↓	0		Housing development would provide housing, Camden's priority land use, but mean the loss of existing employment uses, contrary to policy DP13. Retention of employment uses on the site would have a neutral impact, as it would continue existing uses but would fail to provide new housing (Camden's priority land use). Mixed use development provides the potential to retain employment uses and deliver new housing as part of a mix of uses
40	57 - 71 Pratt Street, 10 - 15 Georgiana Street And Royal College Street	↑↑	↑↓	↑↓		Mixed housing and employment uses would allow more effective use of a currently under-utilised site. The provision of a mix of uses would allow the provision of housing, whilst also delivering new employment uses in place of employment/ training/ community uses to

	Site	Mixed use	Housing	Employment/ commercial	Other options considered	Comments
						replace existing. Sole residential use would not allow re-provision of existing employment/ training floorspace, while sole employment use would fail to take advantage o the potential for some housing to be provided on the site.
41	24 - 58 Royal College Street	↑↑	↑↓	0	Student accommodation: ↓	<p>Housing development would mean the loss of existing employment uses, contrary to policy DP13. Retention of employment uses on the site would have a neutral impact, as it would continue existing uses but would fail to provide new housing (Camden's priority land use). New retail use could contribute to the area as part of a mix of uses, however regard would also need to be given to the size of any retail provided and the sequential approach to provision of such uses under PPS4.</p> <p>Mixed use development provides the potential to retain employment uses and deliver new housing as part of a mix of uses.</p> <p>Significant student housing would result in the loss of employment uses and reduce the amount of permanent housing that would be deliverable on the site. The council's general preference is for housing and employment uses, which are considered to deliver greater benefits.</p>
Other localities						
Kentish Town and Gospel Oak area						
42	115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery	↑↑	↑↓	0	Community facilities: 0	<p>Housing is the borough's priority land use, and provision of new housing on the site in order to facilitate the improvement of housing conditions in the area. However, provision of housing on the site without compensatory provision of community facilities and employment uses (either on or off-site) would be contrary to policies DP15 and DP13.</p> <p>Mixed use development provides the potential to deliver</p>

	Site	Mixed use	Housing	Employment/commercial	Other options considered	Comments
						the required housing whilst addressing the need to re-provide existing uses on-site (as well as off-site as required) Continued provision of employment and community facilities on site would have a neutral impact.
43	19-37 Highgate Road, Day Centre and 25 and 37 Greenwood Place	↑↑	↑↓	0	D1 training: 0	Housing is the borough's priority land use, and provision of new housing on the site in order to make better use of the site and deliver new homes. However, provision of housing on the site without compensatory provision of community facilities and employment uses would be contrary to policies DP15 and DP13. Mixed use development provides the potential to deliver new housing whilst addressing the need to re-provide existing uses on-site Continued provision of employment and training facilities on site would have a neutral impact.
44	Kentish Town Police Station, 10A,12A, 14 Holmes Road	↑	↑↓	↓	Police station: 0	Housing is the borough's priority land use, and provision of new housing on the site in order to make better use of the site and deliver new homes. However, provision of housing on the site without appropriate provision of police facilities as required may be contrary to policy DP15. Mixed use development provides the potential to deliver new housing whilst addressing the need to re-provide the police station facilities and other uses such as employment uses New employment uses on the site would result in the loss of police facilities as well as potentially removing the ability to provide housing on the site, although some employment could potentially be accommodated as part of a mix of uses including housing and a police station.
45	Fire Station, 20 Highgate Road	↑	↑↓	↓	Fire Station: 0	Housing is the borough's priority land use, and provision of new housing on the site in order to make better use of the site and deliver new homes. However, provision

	Site	Mixed use	Housing	Employment/commercial	Other options considered	Comments
						<p>of housing on the site without appropriate re-provision of fire station as required would be contrary to policy DP15.</p> <p>Mixed use development provides the potential to deliver new housing whilst addressing the need to re-provide the fire station and other uses such as employment uses</p> <p>New employment uses on the site would result in the loss of fire station as well as potentially removing the ability to provide housing on the site, although some employment could potentially be accommodated as part of a mix of uses including housing and a fire station.</p>
Hampstead						
46	Former Nurses Hostel, 29 New End	↑	↑↑	↓		<p>The location and nature of the site lends itself to residential use, which is Camden's priority land use. Provision of employment uses on the site would fail to allow the site to maximise its potential for housing. Mixed use development would allow some residential on the site, but would not allow maximum housing provision to be achieved on the site.</p>
Primrose Hill						
47	40-49 St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir	↑	↑↑	0		<p>The location and nature of the site lends itself to residential use, which is Camden's priority land use. Provision of employment uses on the site would fail to allow the site to maximise its potential for housing, which the 2006 UDP Inspector's report has previously supported on the site.</p> <p>Mixed use development would allow some residential on the site, but would not allow maximum housing provision to be achieved on the site, which has already been supported by the 2006 UDP Inspector's report.</p>

KEY:

↑ ↑	Likely large positive impact
↑	Likely positive impact
○	Uncertain impact or no relationship
↓	Likely negative impact
↓ ↓	Likely large negative impact