

**Sustainability Appraisal of the
Camden Local Plan Proposed
Submission Draft**

Non-technical summary

April 2025

Introduction

The Camden Local Plan Proposed Submission Draft will set out the Council's vision for future development in the borough over the next 15 years and includes the planning policies and site allocations to help achieve this.

Sustainability Appraisal (SA) is a requirement for Local Plan preparation. SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising negative effects and maximising the positives.

The London Borough Camden has prepared a Sustainability Appraisal (SA) of the Camden Local Plan Proposed Submission Draft. This is the Non-Technical Summary (NTS) of the SA Report.

Method

The SA began with a 'Scoping' process. This considered information about current and emerging social, economic and environmental conditions and significant sustainability issues in the borough that the new Local Plan could try to address. It also established what higher level plans, such as the London Plan, and national planning policy say the Local Plan must or should aim to do.

This information was then used to develop a set of environmental and sustainability objectives (known as the SA framework) against which the likely effects of the new Local Plan, including reasonable alternatives, could be assessed.

The topics at the core of the SA framework are:

- Homes
- Health
- Equality
- Amenity
- Open Space
- Biodiversity
- Air Quality
- Energy and Resources
- Water
- Climate resilience
- Design
- Historic Environment
- Land
- Economy and Employment
- Centres

The SA identifies what effects different aspects of the Local Plan are expected to have on these topics. The effects can be positive or negative, major or minor. Uncertain effects are also identified.

The SA was subject to a number of technical difficulties and limitations, such as the inherent difficulty of predicting the effects of development provided for by the Local Plan when the particular design and layout of developments will only be known when specific proposals come forward, and the need to use assessment methods that are proportionate to the level of detail in a borough-wide plan.

Appraisal of growth and spatial options

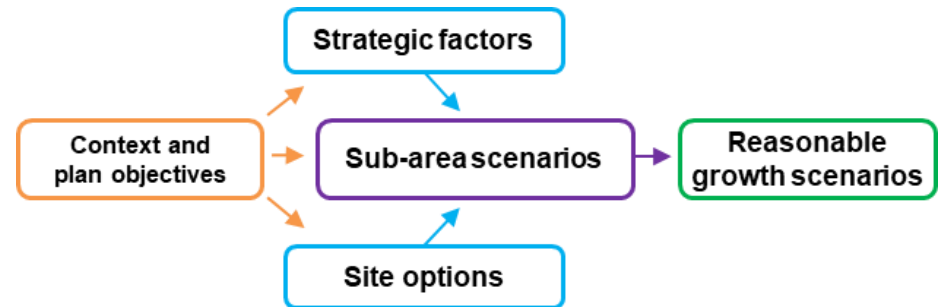
Local Plan policies and site allocations should support and deliver a preferred growth and spatial strategy. Given this, one of the key priorities in the development of a Local Plan is to identify and appraise a range of growth and spatial options:

- **Growth options** represent the range of potential scales of housing and economic growth that could be planned for over the Local Plan's lifespan (the Local Plan period).
- **Spatial options** represent the range of potential locational distributions for the various growth options over the Local Plan period

As part of the SA there is a legal requirement to examine reasonable alternatives (or options) taking into account the objectives and geographical scope of the Plan. Given this, this SA focuses on reasonable alternatives in the form of 'growth scenarios', defined as alternative approaches to the supply of land, including by allocating sites, in order to provide for development needs and support the achievement of wider plan objectives.

Defining growth scenarios

The process taken to define reasonable alternative growth scenarios in Camden is illustrated below and discussed in the next sections.



Strategic Factors

A number of strategic issues and options have a bearing on the definition of reasonable growth scenarios in Camden. Specifically:

- **Quantum** – how many new homes are needed (regardless of capacity to provide them)? Similarly, what is the need locally for employment floorspace, and of what types?
- **Distribution** – where new homes and jobs can be delivered in the borough and whether there are some areas in the borough that are better able to accommodate growth than others, taking into account planning considerations?

Quantum:

Housing - The new Camden Local Plan sets a target to deliver a minimum of 11,550 additional homes over the plan period to 2041. This factors in the London Plan housing target for Camden of 1,038 homes per year for the first three years of the Plan period (2026/27, 2027/28 and 2028/29) and also

includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period).

The housing target in the Local Plan is a capacity-based target, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in a small sites windfall allowance and taking into account past under-delivery. The target also reflects the uncertainty and delay in development at Euston, related to HS2.

It should, however, be noted that the imminent review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the target in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2027, which would mean Camden's new Local Plan housing target is only in place for a short period of time.

Employment - The Employment Needs Assessment 2023 considers: A) existing and committed supply, and B) forecast demand, before C) considering the balance between supply and demand ('gap analysis'), and then making recommendations for the Local Plan.

The requirement for office floorspace from 2023 to 2041 is 406,359 sqm above the total existing stock. This need will primarily be met through existing permissions, which total 211,028 sqm office floorspace, with the remainder proposed to be met through site allocations in the Local Plan and windfall development.

The requirement for industrial land from 2023 to 2041 is 0.8 ha below the total existing stock. The ENA therefore recommends protecting remaining industrial land given limited or no potential to add to the existing stock.

Distribution:

Whilst Camden is a highly accessible central London borough, there is limited land available to deliver new development.

North Camden is characterised by Hampstead Heath and extensive conservation area coverage, and there is limited or no strategic growth opportunity at the one town centre in this area (Hampstead).

West Camden also has extensive conservation area coverage, and the one strategic growth area (centred around the O2 site) is now permitted in its entirety (notwithstanding detailed applications to be submitted), meaning there is limited or no potential for further growth in this area. There are three town centres in West Camden (Kilburn, West Hampstead and Finchley Rd / Swiss Cottage), however none present any real growth opportunity (over-and-above that which is already permitted).

Central Camden includes two key areas of consideration, namely Camden Town and Kentish Town. With regards to Camden Town, there is an important cluster of development site options in the area known as the Camden Goods Yard; however key sites here are now permitted, meaning that limited additional growth opportunity remains. With regards to Kentish Town, which includes the borough's only designated

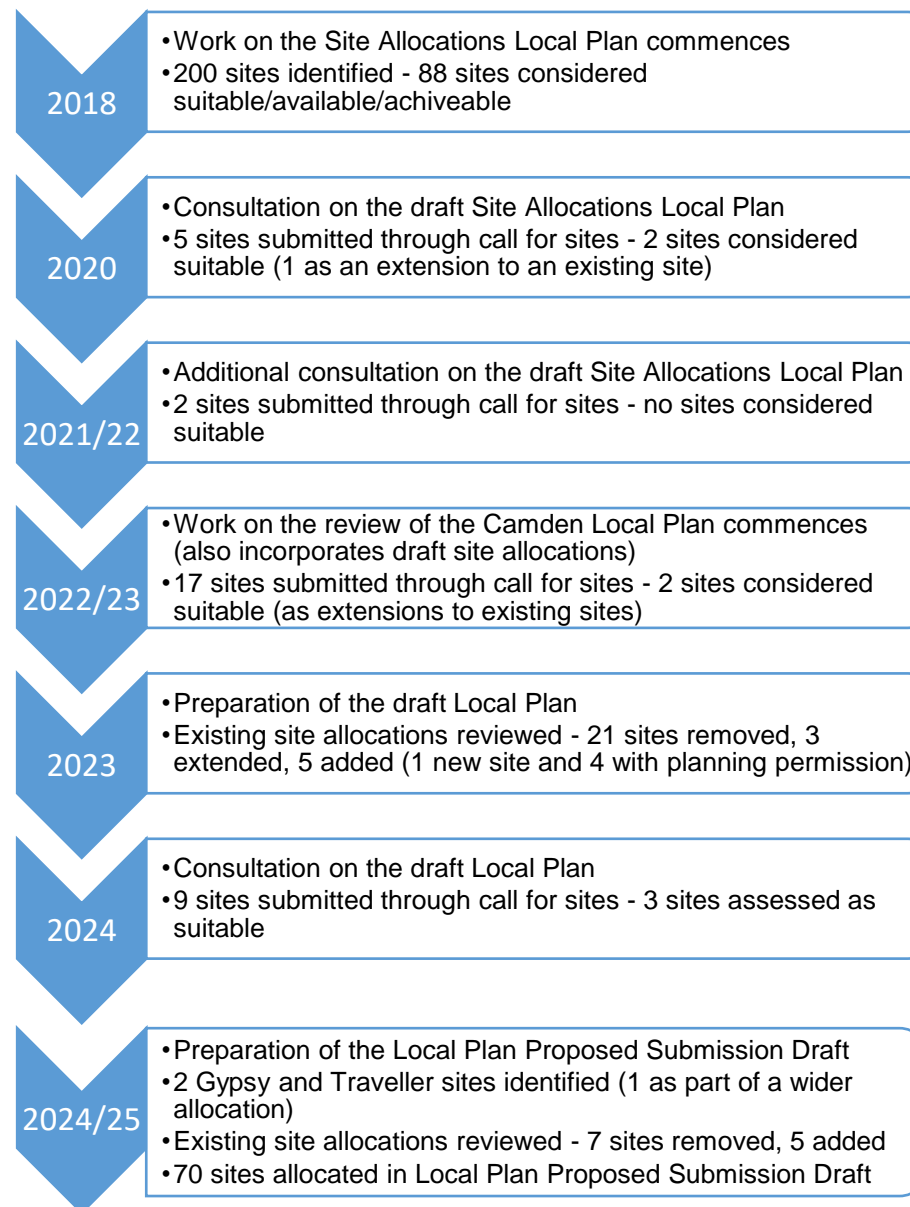
Industry Area, there is a need to plan for the future of two large sites - Regis Road and the Murphy site.

South Camden comprises three key areas of consideration:

- **King's Cross and Euston** – development at King's Cross is largely complete meaning there is little or no potential opportunity for further growth in this area. Major development is expected to come forward at Euston, guided by the Euston Area Plan, however this is likely to be at the end of the Local Plan period and will continue beyond this date.
- **Camley Street and St Pancras Way** – given its location adjacent to King's Cross and the fact that the area includes low density employment land, this area presents significant development opportunity.
- **Central London Activities Zone (CAZ)** – this is a nationally and internationally important centre of business and is home to many of London's strategic assets. There is excellent transport connectivity and CAZ retail clusters at Holborn and Tottenham Court Road (which is a London Plan [Opportunity Area](#)).

Site options

In parallel with the 'top-down' consideration of growth scenarios, the Council undertook a 'bottom up' approach to defining reasonable alternative growth scenarios, based on the individual site options available. The process and timeline for identifying site options is outlined opposite.



All site options identified have been subject to a staged sifting process. This involved:

1. Site eligibility check;
2. Basic site suitability and high level availability check;
3. Detailed site suitability and sustainability check; and
4. Achievability check.

Where sites have been discounted, this has been for clear cut reasons. A list of discounted sites is set out in Appendix 5 of the SA Report.

All reasonable site options have been allocated in the new Local Plan.

In finalising the Local Plan (Regulation 19 version) all the site allocations have been reviewed and updated. As a result: seven sites previously allocated in the draft new Local Plan (Regulation 18) have been removed due to the fact that they are completed or significantly under construction; and five new sites have been added, one of which has planning permission (160 Maldon Rd). In total, the Local Plan Proposed Submission Draft (Regulation 19 version), therefore, includes 70 site allocations.

Sub Areas

In addition to considering A) 'top down' considerations with a bearing on reasonable growth scenarios; and B) the 'bottom-up' consideration of site options, the SA also explored growth

options for each of Camden's sub-areas: South Camden, Central Camden, West Camden and North Camden.

This concluded that there is little or no opportunity to deliver additional development in North and West Camden; and that in Central and South Camden, whilst a number of development opportunities exist, particularly around Kentish Town and Camley Street, it is very difficult to see how housing supply and economic growth could be further increased.

Growth scenarios

Taking into account the quantum and distribution of growth, and site options available for delivering growth, the reasonable alternatives (growth scenarios) considered were:

- **Baseline 10,500 homes** – here the housing requirement would be set at a figure around 1,000 homes lower than the emerging preferred option, so approximately 10,500 homes over the plan period, on the basis that a more protectionist approach is taken to industrial land, meaning there would be more limited potential to deliver new homes as part of the mixed-use redevelopment of the Murphy, Regis Road and Camley Street sites. This would also have implications for the delivery of employment land supply locally and would result in lower levels of economic growth. Other than this, the spatial distribution of growth would be the same as the emerging preferred option.
- **Baseline of 11,550 homes (Emerging preferred option)** – here the housing requirement is set at 11,550 homes.

Allocations would deliver the capacity figures discussed in Section 4.1.3 of the main SA, with the aim of aligning with the recommendations of the Employment Needs Assessment (ENA, 2023) in relation to the delivery of additional office floorspace.

- **Baseline of 12,850 homes** – here the housing requirement would be set at 12,850 homes, calculated as the London Plan target for the first three years of the plan period (1,038 x 3) plus the London Plan SHLAA figure for the latter 12 years (811 x 12). This would also have implications for employment land supply locally, and would result in lower levels of economic growth. Again, the spatial distribution of growth would be the same as the emerging preferred option.

Whilst these reasonable growth scenarios were identified as part of the preparation of the Regulation 18 draft Local Plan, they have been reviewed as part of the preparation of the Regulation 19 Local Plan Proposed Submission Draft. They are still considered to be reasonable alternatives, and no further reasonable alternatives have been identified.

Appraisal of the growth scenarios

The appraisal of the growth options is presented under 15 headings in Chapter 4 – one for each of the objectives that together comprise the SA framework, before the final section presents an overview ‘matrix’. Under each heading, the aim is to: 1) rank the scenarios in order of performance (with a star

indicating best performing); and then 2) categorise the performance in terms of ‘significant effects’. The appraisal is also undertaken with minimal assumptions regarding development management policies.

Homes - All of the three scenarios will deliver an increase in homes and are therefore considered to have a ‘limited or uncertain’ positive effect.

Whilst the higher growth option will inevitably deliver greater numbers of new homes, given it is likely that these will need to be delivered at higher densities than the other options, due to the limited availability of land, this could affect housing mix, and lead to the delivery of more one-bedroom homes, which would not meet identified need.

It is considered that the higher growth option performs best against this indicator, followed by the emerging proposed approach, and the lower growth option.

Health - All options have the potential to improve health and wellbeing and reduce health inequalities. The delivery of additional homes could put pressure on existing health services in Camden; however this could be mitigated through the identification of new health facilities in the Plan. Higher growth has potential tensions with this objective though, as it may lead to a reduction in open space provision. All options are considered to have a ‘limited or uncertain’ positive effect.

Equality - There are wide ranging benefits associated with growth that could help to tackle poverty and social exclusion and promote opportunities. All options are therefore considered to have a ‘limited or uncertain’ positive effect.

Amenity - The higher growth option could be considered to have a greater impact on amenity (compared to the emerging preferred option), given it is associated with higher levels of development, that would likely be delivered at higher densities, involving taller, bulkier buildings that would likely occupy a greater site area, which could lead to overlooking, overshadowing, loss of daylight/sunlight and impact on microclimate. Conversely, the lower growth option, could also have a greater impact on amenity as it does not involve the re-development of key employment sites, which contain uses that are in some cases considered to be 'bad neighbours' and impact on amenity.

The emerging proposed approach performs best against this indicator, followed by the higher growth option and lower growth option. All options are considered to have a neutral effect.

Open space - All options would help to conserve and improve open space provision. The emerging proposed approach provides the best opportunity to deliver new open space in Camden to the benefit of local communities, through the redevelopment of existing sites that currently do not provide any open space. Although helping to conserve existing open space, the lower growth scenario would potentially lead to the delivery of less open space, compared to the emerging proposed approach, given that it assumes that the industrial sites of Camley St, Regis Road and Murphy will remain in their current use. The higher growth scenario may deliver less new open space compared to the emerging proposed approach, given that more land take may be required on sites to enable the development of greater numbers of new homes.

The emerging proposed approach is considered to have a 'limited or uncertain' positive effect and the high growth and lower growth options are considered to have a neutral effect.

Biodiversity - All options have the potential to impact on biodiversity in a number of different ways. The higher growth scenario could result in biodiversity / green infrastructure objectives being compromised. The emerging proposed approach expects biodiversity improvements to be delivered on the Regis Rd, Murphy and Camley Street sites, which should have a positive effect. Furthermore, while the lower growth scenario helps to protect biodiversity, it is unlikely to significantly contribute the enhancement of biodiversity, given that it seeks to protect existing industrial sites, which provide a key opportunity for delivering positive effects.

It is considered that the emerging proposed approach and lower growth scenario perform best against this indicator, followed by the higher growth option. All options are considered to have a neutral effect.

Air quality – Here, there is a need to consider the construction stage of development, which can be associated with significant localised air (and noise) pollution. All options are likely to have a (limited or uncertain) negative effect in relation to this. It is difficult to differentiate between the growth scenarios in respect of air quality. All options are considered to have a 'limited or uncertain' negative effect.

Energy and resources - All options have the potential to support the efficient use of energy and resources. The emerging proposed approach presents the greatest opportunity in this respect, given that development proposed would enable reuse of resources, identify opportunities for heat networks and renewable energy generation. The higher growth option would also help to achieve these objectives, but the positive effects may be outweighed by the need for taller buildings and larger basements which could reduce the opportunity for renewable energy generation by solar pv and generally feature a higher proportion of embodied carbon.

The emerging proposed approach is considered to have a 'limited or uncertain' positive effect and the higher growth and lower growth scenarios are considered to have a neutral effect.

Water - All options support development in existing built-up areas and therefore any effect on the Groundwater Source Protection Zone and Secondary A aquifers is likely to be limited. It is difficult to differentiate between the growth scenarios in respect of water, all options are considered to have a neutral effect.

Resilience - Given the high-level nature of these growth options, it is not possible to distinguish between them with respect to climate change adaptation. The quantum and distribution of development is not likely to influence sustainable design and construction techniques in development or respond to extreme weather effects as a

result of climate change. Overall, a neutral effect is expected for all options.

Design - All options have the potential to promote high quality and sustainable design through the delivery of new development. The emerging proposed approach and higher growth scenarios involve the development of key strategic sites, that are well-suited to a masterplanned and design-led approach to redevelopment, focused on place-making. Delivering higher levels of growth on the key strategic sites may however lead to bulkier, more dense, development and less open / public space, which may reduce any potential design benefits.

All options are considered to have a 'limited or uncertain' positive effect.

Historic environment – It is considered that the higher growth option has the potential to have a 'limited or uncertain' negative effect on heritage, given that development would need to be delivered at higher densities or greater heights compared to the other two scenarios, which could lead to a greater impact on the historic environment. Whereas, the lower growth scenario and proposed approach are considered to have a neutral effect, as whilst these options could result in heritage impacts, there is a greater opportunity for these to be mitigated and for benefits / enhancements in relation to the historic environment to be delivered.

The lower growth scenario and the emerging proposed approach perform the best against this indicator, followed by

the higher growth scenario. The lower growth scenario and emerging proposed approach are considered to have neutral effects.

Land - Given the built up, inner city, nature of Camden, all options involve the development of previously developed land. However, it is evident that the higher growth scenario and emerging preferred approach would use land more efficiently than the lower growth scenario, as they involve the intensification of key employment sites (e.g. Camley Street, Regis Road and Murphy) to deliver greater levels of housing and economic growth, when compared to the lower growth scenario, which involves the continued protection of industrial land rather than mixed use intensification.

The emerging proposed approach and higher growth scenario perform the best against this indicator, followed by the lower growth option. The emerging proposed approach and higher growth scenario are considered to have a 'limited or uncertain' positive effect, and the lower growth option is considered to have a negative effect.

Economy and employment - The emerging proposed approach is considered to have a 'limited or uncertain' positive effect, as it aims to intensify employment uses within existing industrial sites, thereby contributing to economic growth. Whereas the lower growth scenario would continue the status quo on existing industrial sites and therefore have a neutral effect, as it would not contribute to increased economic growth. Furthermore, whilst the higher growth scenario will

support the delivery of economic growth, it could also lead to a reduction in industrial floorspace, in order to accommodate greater numbers of new homes on sites, thereby having a neutral effect.

Whilst the lower growth scenario presents a 'business as usual' situation on existing industrial sites, which will protect existing employment uses, it would also reduce the opportunity to provide additional employment space through the intensification of these sites. With regards to the higher growth scenario, there are concerns that this could lead to pressure for new homes in place of office floorspace as part of mixed use developments, and feasibly even housing only schemes instead of mixed use schemes.

The emerging proposed approach performs the best against this indicator, followed by the higher growth and lower growth options.

Centres - There is little reason to suggest that the alternative growth scenarios will have significant implications for any of the borough's town centres. In fact, the quantum and distribution of growth proposed under all options should help support designated centres to remain sustainable and adaptable for the future, by encouraging the retention and expansion of commercial and retail uses in the borough's designated centres.

All options are considered to have a 'limited or uncertain' positive effect.

The reasonable alternative growth scenarios – summary appraisal findings

Sustainability topic	Lower growth (~10,500 homes)	Emerging proposed approach (11,550 homes)	Higher growth (12,850 homes)
Homes	3	2	1★
Health	2	1★	2
Equality	=	=	=
Amenity	2	1★	2
Open space	2	1★	2
Biodiversity	1★	1★	2
Air quality	=	=	=
Energy and resources	2	1★	1★
Water	=	=	=
Resilience	=	=	=

Design	2	1★	2
Historic environment	1★	1★	2
Land	3	1★	1★
Economy & employment	2	1★	2
Centres	=	=	=

Following the appraisal of the growth scenarios, the lower growth scenario was discounted as it would not deliver the numbers of homes needed to meet the housing target set out in the Local Plan. Whilst it is acknowledged that none of the three alternative options appraised would meet housing need in full, this option, by its nature, makes less of a contribution to meeting housing need than the others. Furthermore, it would deliver lower levels of economic growth than the emerging proposed option.

The higher growth option was also discounted as it would necessitate the delivery of high-density development and taller buildings which could lead to the over-development of already constrained sites - particularly as a design led approach has been taken to inform the optimum site capacity. This in turn could impact on the character of certain places in the borough, the natural and historic environment and

designated viewing corridors. Furthermore, whilst this option delivers the most housing, it would not deliver the mix of housing types needed (as it would deliver a higher proportion of one- or two-bedroom homes, due to the need for more dense housing provision). This option would also deliver lower levels of economic growth and open space (compared to the emerging proposed option), as a result of the need to maximise housing delivery on available sites.

The preferred option is therefore the emerging proposed approach, as it would deliver the additional homes needed to help meet the borough's housing target, factoring in the limited land available in Camden to deliver new development, whilst also delivering economic growth in line with the recommendations in the Economic Needs Assessment (ENA, 2023). This option will also provide a mix of housing types (including more family housing and more affordable homes), enable better place-making and support the delivery of community and Council aspirations for the redevelopment of the industrial sites at Camley Street, Regis Road and Murphy. Furthermore, this option provides significant opportunities to deliver social, environmental and economic benefits to Camden's communities, whilst making efficient use of the limited land available.

Identifying and appraising alternatives

An important part of the SA process is to assess reasonable alternatives to what the plan is proposing. In particular, the SA sets out:

- How reasonable alternatives were identified;
- The results of the assessment of the reasonable alternatives; and
- Why the preferred alternatives were selected and others rejected.

The SA of reasonable alternatives or options aims to inform the aspects of the Local Plan that address some of the main planning issues facing the plan area and where clear alternative approaches to addressing these issues exist. As part of the preparation of the new Local Plan reasonable alternatives were identified in relation to the following policies:

- Maximising the supply of self-contained housing from mixed use schemes;
- Prioritising the retention of existing buildings;
- Sustainability improvements to existing buildings;
- Energy use and the generation of renewable energy; and
- Affordable workspace.

The Council then subjected these to an appraisal against the SA Framework. The SA findings for these reasonable alternatives and reasons for selecting the preferred approach are provided in Chapter 5 and Appendix 4 of the full SA Report.

Appraisal of the Local Plan

Chapters 6 and 7 of the SA present an appraisal of the Camden Local Plan Proposed Submission Draft.

The Local Plan vision and strategic objectives were found to have a number of positive effects against the SA framework, with the most positive effects identified for the SA objectives on Health and Equality. This reflects the Council's ambition to improve health and wellbeing and reduce inequality, to ensure that Camden is a place where no one gets left behind, securing better outcomes for all. Other positive effects have been identified in relation to the SA objectives for homes, open space, biodiversity, energy and resources, resilience, design, economy and centres. It was considered that the strategic objectives could have made more explicit reference to measures to the need to use land more efficiently, protection of water resources, air quality, the historic environment and amenity; however, it is recognised that more detailed policies within the Camden Local Plan either directly or indirectly address these SA objectives.

The appraisal of the Local Plan is presented under the 15 topic headings that together comprise the core of the SA framework. A summary of the findings of the SA is set out in the following paragraphs.

Homes - The Camden Local Plan includes a number of policy measures aimed at both maximising housing supply and delivering a range of housing types to meet local housing need. The Plan also sets out the overarching framework to

support housing delivery in the South, Central, West and North areas of Camden and allocates sites to help deliver this.

Whilst policies which support alternative land uses or have cost/viability implications have the potential to lead to a degree of tension with housing-related objectives, the Plan is clear that self-contained housing is the priority land-use in Camden, recognising the extent of housing need locally. A **limited or uncertain positive effect** is predicted.

Health - Health and wellbeing is a key focus of all aspects of the Local Plan including area policies, site allocations, and the topic specific policies. As such, a **significant positive effect** is predicted.

Equality - Development supported through the Local Plan should lead to wide-ranging benefits including affordable housing, new jobs, training and apprenticeships, community facilities and open spaces. The approach in the Plan also focuses on designing places that reflect and celebrate Camden's diversity and that are welcoming, inclusive and accessible to all, to meet the needs of Camden's diverse communities. A **significant positive effect** is predicted.

Amenity - Whilst growth in the Camden context does inevitably give rise to tensions with objectives relating to amenity, particularly at the construction stage, the Local Plan sets out to avoid, minimise, and mitigate impacts through site specific and area wide topic specific policy. It should also be noted that in the baseline situation, development comes

forward regardless, but in a less well planned way. A **neutral effect** is predicted.

Open space - The Plan has a strong emphasis on the protection of existing, and delivery of new, open space and a number of development sites have been identified to support the delivery of new open space. A **limited or uncertain positive effect** is predicted.

Biodiversity - In the Camden context there is clear potential for development to boost biodiversity, and the Plan has a strong focus on realising opportunities. A **'limited or uncertain' positive effect** is predicted.

Air quality - Poor air quality is an important issue locally and it is important to recognise that growth will continue to come forward in the absence of a new Local Plan. There is good potential to address this issue through relevant Plan policies and through careful decision-making in respect of site capacity and use mix, the location of sensitive uses and the design of development. Ongoing work is guided by the Council's Clean Air Action Plan. A **neutral effect** is predicted.

Energy and resources - The Local Plan has a key role to play in delivering the actions within the Council's Climate Action Plan to help meet the borough's target to reach net zero by 2030. **Moderate or uncertain positive effects** are predicted for this group of policies, which are likely to be realised in the medium to long term, with short term effects likely on smaller scale retrofit improvements.

Water - A key consideration is Camden's Groundwater Source Protection Zone (inner and outer area). Furthermore, areas around Hampstead Heath, Hampstead, Bloomsbury and Holborn are designated as Secondary A Aquifers (which means they are capable of supporting local water supply). There are a number of development activities that can impact on groundwater, but it is not possible to conclude that the area policies and site allocations will lead to any effects providing Policy NE4 (Water Quality) is applied. A **neutral effect** is predicted.

Climate resilience – The Local Plan has a key role to ensure the borough is able to adapt to warmer weather, periods of drought, and flooding. Whilst the Plan could have a positive effect against this objective, given that the approach taken seeks to embed climate resilience into policy, the degree of this effect is unknown, and as such a **neutral effect** is predicted.

Design - The Plan includes a number of policies which promote high quality and sustainable design, which should lead to a positive effect against this SA objective. Whilst it is recognised that the impacts associated with tall buildings can be both positive and negative, it is considered that the policy in the Plan includes sufficient provisions to mitigate any potential adverse effects. **Limited or uncertain positive effects** are predicted.

Historic environment - Whilst it is acknowledged there is some potential for conflict with this SA objective and other policies in the Local Plan, given national policy and the Plan's

support to enhance and improve heritage in the borough overall a **neutral effect** is predicted.

Land - Taking into account the area policies, site allocation policies and topic specific policies in the Plan that seek to ensure that new development makes efficient use of Camden's limited land, a **limited or uncertain positive effect** is predicted.

Economy and employment - Local Plan policies on the economy aim to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to, and share in, the borough's economic growth. In consideration of the spatial strategy alongside site-specific and area-wide development management policy, a **significant positive effect** is predicted. The Local Plan should serve to support Camden's role as one of the most important business locations in the country.

Centres - Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole. 9.81 The Local Plan focuses on sustaining and enhancing centres, having regard to their distinctive roles, character and accessibility, while allowing beneficial change that meets local needs and priorities, including supporting the visitor / destination role of the West End and existing retail clusters in the Central Activities Zone (CAZ). After having accounted for the spatial strategy alongside the proposed suite of topic specific policies, and after having given consideration to the baseline

situation (which is one whereby development comes forward in a less well-planned way), it is considered appropriate to predict a **limited or uncertain positive effect**.

Cumulative effects

There is a requirement in SA to consider 'cumulative effects', that is, effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. Cumulative effects arise, for instance, where several individual policies and sites have a combined effect on an objective, or where several policies and sites each have insignificant effects but together have a significant effect.

The cumulative effects of the plan are discussed in Chapter 7 of the SA report and Table 7.1 in the SA full report appraises the Local Plan policies for potential cumulative effects.

This also provides an opportunity to discuss potential long term and 'larger than local' effects, in addition to external factors like market forces. For Camden, this primarily translates as a need to consider the implications of the Local Plan for other London Boroughs, for sectors of London (e.g. the CAZ) and for London as a whole. In this respect, the Council has taken into account consultation responses received from the Greater London Authority and the London Borough of Islington, in addition to matters raised through duty to co-operate meetings with neighbouring boroughs. As well as the larger-than-local Housing Market Area (HMA) within which Camden is located, and the Functional Economic Market Area (FEMA) in which Camden is positioned. It should

however be noted that the imminent review of the London Plan will distribute housing and employment growth across all London boroughs, accounting for infrastructure and other factors.

Conclusion

On the whole, the growth strategy and policies in the Camden Local Plan Proposed Submission Draft perform better than or similar to the reasonable alternatives tested and overall it is considered that the Plan will have a positive effect against social, economic and environmental objectives.

The policies in the Local Plan Proposed Submission Draft have the potential to generate significant positive effects for the borough across the range of sustainability issues tested through this SA process, as shown in the number of positive cumulative effects identified in Chapter 7 of the SA Report.

The scale of development proposed through the Camden Local Plan does have the potential to generate negative effects on the borough's existing biodiversity and heritage assets, community facilities, water and air quality. However, every effort has been made in the Plan to avoid and minimise such negative effects through a robust and diverse range of policy approaches.

The London Borough of Camden does not exist in isolation. Neighbouring boroughs are also planning to deliver considerable amounts of development. This will result in

cumulative effects, for example through the generation of additional traffic. The Council will therefore continue to work closely with its neighbours and the Greater London Authority to make sure that plans are co-ordinated to provide an integrated approach to maintaining and enhancing quality of life for residents, workers and visitors, and to ensure that a high quality and resilient environment is created.

Next steps

This SA Non-Technical Summary will be available for comment on the Council's website, alongside the main SA Report, as part of the consultation on the Local Plan Proposed Submission Draft.

Representations received will be submitted with the Plan and supporting documents to the government in the Autumn. The Plan will then be examined by a Planning Inspector. The examination will include public hearing sessions involving objectors and other participants invited by the Inspector. These are expected to take place in early 2026.

Following receipt of the Inspector's report and consideration of any recommended amendments, the final version of the Local Plan will be reported to Cabinet and Full Council for adoption.

When the Plan is adopted a 'SA Adoption Statement' must also be published, which sets out certain information including monitoring indicators. It is then for the Council to choose an appropriate monitoring framework in light of practical considerations around available resources.