

Scoping Report

March 2023

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Chapter 1: Introduction

- 1.1 This document is the Scoping Report for the Sustainability Appraisal (SA) of Camden's new Local Plan.
- 1.2 This scoping report explains:
- Why a sustainability appraisal of the new Local Plan is required;
 - The policies, plans and programmes relevant to the Local Plan;
 - The baseline information for the various indicators used to appraise development plan documents;
 - The sustainability appraisal process and requirements; and
 - How the information obtained is taken forward in the SA, and the Local Plan.
- 1.3 The UK Government (through the Environmental Assessment of Plans and Programmes Regulations 2004) requires the contents of the scoping report to be consulted on with the following agencies:
- The Environment Agency
 - Natural England
 - Historic England
- 1.4 We are now at the stage where we wish to obtain the views of these agencies, on this scoping report. Consultation at this stage will help to make sure that the SA will be comprehensive and robust and meet statutory requirements. Questions on which interested parties' comments are sought are included at the end of this report.

Background

- 1.5 The National Planning Policy Framework 2021 states that Local Plans should be reviewed at least every five years to assess whether they need updating and that this process should commence no later than 5 years from the point the Plan is adopted. Given that the Camden Local Plan was adopted in 2017, the decision was taken in 2022 to begin a review of the current Local Plan. The purpose of the Local Plan review is to update our existing planning policies to ensure they are as effective as possible in achieving Camden's priorities and addressing the issues we face.
- 1.6 Where the Council has been progressing a new Site Allocations Local Plan, we are now proposing to incorporate the site allocations from the draft Site Allocations Local

Plan, which we have consulted on previously, into the Local Plan, to take a more holistic and place-based approach.

- 1.7 The new Camden Local Plan will therefore set out the strategic policies, development management policies and site allocations for the Borough.
- 1.8 The adopted Camden Local Plan (2017) and draft Site Allocations Local Plan (2020) were subject to SA/SEA throughout their preparation and that SA work is being drawn on, as appropriate, to inform the SA/SEA of the new Camden Local Plan.
- 1.9 The timetable for the preparation of the new Local Plan is set out in the [Council's Local Development Scheme](#).

Sustainability Appraisal and Strategic Environmental Assessment

- 1.10 Under the Planning and Compulsory Purchase Act sustainability appraisal is mandatory for Local Plan Documents.
- 1.11 The National Planning Policy Framework states that local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets relevant legal requirements. The Appraisal should demonstrate it has “addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)” (NPPF, paragraph 32).
- 1.12 In preparing a Local Plan Document, Local Planning Authorities are also required to carry out an environmental assessment, known as a Strategic Environmental Assessment (SEA). This requirement comes from European Directive 2001/42/EC (the SEA Directive) and has been enacted in the UK by a separate piece of legislation: the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). This legislation has subsequently been amended by the Environmental Assessments and Miscellaneous Planning (Amendment)(EU Exit) Regulations 2018 (SI 2018/1232), as set out in the explanatory Memorandum accompanying the Brexit amendments, to ensure that the law functions correctly following the UK's exit from the EU, however no substantive changes were made by this instrument to the way the SEA regime currently operates, meaning that the SEA Regulations remain in force.

- 1.13 The use of the term SA throughout this document therefore also encompasses any relevant requirements of an SEA.
- 1.14 In addition to complying with legal requirements, the approach being taken to the SA of the new Camden Local Plan is based on current best practice and guidance on SA/SEA set out in the Government's Planning Practice Guidance.
- 1.15 This requires SA to be carried out as an integral part of the plan making process and Table 1 sets out the main stages of the plan making process and shows how they correspond to the SA process.

Table 1 - Corresponding stages in plan making and SA

Local Plan	Sustainability Appraisal
Step 1 – Evidence gathering and engagement	Stage A - Setting the context and objectives, establishing the baseline and deciding on the scope.
Step 2 - Production and consultation	Stage B - Developing and refining options and assessing effects
	Stage C - Preparing the SA Report
	Stage D - Consulting on the Plan and SA report
Step 3 - Examination	Stage E - Monitoring the significant effects of implementing the Plan
Step 4 and 5 – Adoption and Monitoring	

Purpose of the SA Scoping Report

- 1.16 This scoping report forms the first stage (Stage A) of the SA of the new Camden Local Plan.
- 1.17 The scoping stage of the SA involves understanding the social, economic and environmental baseline for the Plan area, as well as the sustainability policy context, to identify the broad sustainability effects of the Local Plan.
- 1.18 The outcomes of this exercise are then used to help inform the development of a set out sustainability objectives (the SA Framework) against which the effects of the Plan can be appraised. These objectives in turn will go on to provide the structure

and scope of the final draft SA, which will be consulted upon alongside the draft new Local Plan.

Structure of the SA Scoping Report

1.19 This section has set out the background to the production of the new Camden Local Plan and the requirement to undertake SA. The remainder of the report is structured as follows:

- **Chapter 2 – Policy Review:** identifies the other policies, plans and programmes, and sustainable development objectives that are of relevance to the SA of the new Local Plan.
- **Chapter 3 – Summary of the Baseline:** presents the relevant social, environmental, and economic baseline information that will inform the assessment of the policies and site allocations in the new Camden Local Plan.
- **Chapter 4 - Identification of Key Sustainability Issues:** identifies the key sustainability issues in the London Borough of Camden that are of relevance to the new Local Plan.
- **Chapter 5 – SA Framework:** presents the SA framework consisting of SA objectives and indicators that will be used for the appraisal of the new Local plan.
- **Chapter 6 – Consultation:** sets out the process for consulting relevant authorities on the scope of the SA and describes the next steps to be undertaken in the SA of the new Camden Local Plan.

Chapter 2: Policy Review

- 2.1 The SA must take into account the relationship between the Local Plan and other relevant policies, plans, programmes and sustainability objectives. This section presents an overview of existing plans, programmes, policies, and sustainability objectives that are considered to be of most relevance.
- 2.2 In addition, the SEA Directive specifically requires environmental protection objectives established at international, European Community or national levels to be taken into account. The Environmental Report (also referred to as the SA) should provide information on:
- The relationship [of the plan or programme] with other relevant plans and programmes and
 - The environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation" (Directive Annex I a and e).
- 2.3 Government guidance indicates that this process will help to:
- identify any external social, environmental or economic objectives that should be taken into account in the SA of the Local Plan;
 - identify other external factors, including sustainability issues that might influence the preparation of the Local Plan; and
 - determine whether other policies, plans and programmes might give rise to cumulative effects when combined with the Local Plan that is subject to the SA.
- 2.4 Identifying and reviewing these documents is an important element of the SA and SEA process, as it can help to shape the objectives against which the Plan should be appraised, as well as indicating any particular issues and problems that need to be addressed. Potential synergies, inconsistencies and constraints can also be identified.
- 2.5 A review of relevant policies, plans and programmes has been carried out as part of this stage of the SA process. The objectives and requirements of international and European strategies and Directives are now sufficiently well established to have translated down into existing and emerging national, regional and local programmes, plans and policies. Their influence will be strongly felt in the consideration of these lower tiered documents, so it is considered appropriate in this SA to focus on their key messages before reviewing other documents in greater detail.

- 2.6 **Table 2** indicates international and European strategies and Directives that will have been taken into account. Links to the sources of these documents are provided.
- 2.7 Further assessment relates only to those national, regional and local strategies, plans and programmes which have been considered to have most relevance to the Local Plan. It has proceeded on the presumption that sustainability policy and objectives of higher order plans are now sufficiently embedded within them.
- 5.1 **Table 3** provides a summary list of the national, regional and local strategies, programmes, plans and policies that have been reviewed. Links to the sources of these documents are also provided.
- 5.2 A full assessment of relevant documents has been undertaken to identify the relevant objectives and targets from the plans reviewed and their potential implications for the sustainability appraisal objectives, the Local Plan, and Site Allocations. This is included in **Appendix 1**.

Table 2- International Organisations, the Relevant Documents and Key Messages Relevant to Other Plans and Programmes

C40 Cities:	<p><u>Opportunity 2030: Benefits of Climate Action in cities (2018)</u></p> <p>This document provides evidence to demonstrate how the socioeconomic and health-related benefits of climate actions for societal wellbeing. The measure applicable to Camden is <i>Energy efficiency retrofit of residential buildings</i>. This document also cross-references to the UN Sustainable Development Goals.</p> <p><u>Urban Climate Action Impacts framework</u></p> <p>Provides a useful framework for gathering and measuring sustainable development in relation to 'Climate Action Impacts Taxonomy' in an urban setting.</p> <p><u>Cornerstone reports</u></p> <p><u>Deadline 2020: How cities will get the job done (2016)</u></p> <p>Deadline 2020 is the first significant route map for achieving the Paris Agreement, outlining the pace, scale and prioritisation of action needed by C40 member cities over the next 5 years and beyond. Deadline 2020 is focused on C40 cities, the findings are more broadly applicable.</p> <p><u>Focused Acceleration: A strategic approach to climate action in cities to 2030 (2017)</u></p> <p>Deadline 2020, published in 2016, was the first significant city-scale routemap for achieving the Paris Agreement. Focused Acceleration builds on that analysis to distil the 450 possible actions identified in Deadline 2020 down to twelve priority opportunities, across four action areas. The four priority action areas were: decarbonising the electricity grid, optimising energy efficiency in buildings, enabling next generation mobility and improving waste management.</p> <p><u>The future we don't want: How climate change could impact the world's greatest cities (2018)</u></p> <p>This research predicts how many urban residents will face potentially devastating heat waves, flooding, and droughts by 2050 if global warming continues on its current trajectory. The Future We Don't Want also looks at indirect climate impacts and estimates how climate change under a 'business-as-usual scenario' will impact urban food security and energy systems as well as the urban poor, who are most vulnerable to climate change.</p>
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United Nations (UN)	<u>UN Sustainable Development Goals</u>	
	Out of the 17 UN goals, Camden can help achieve 13 of them:	
	Goal 1 <i>No poverty</i>	Goal 10 <i>Reduced inequalities</i>
	Goal 3 <i>Good Health and wellbeing</i>	Goal 11 <i>Sustainable cities and communities</i>
	Goal 4 <i>Quality education</i>	Goal 12 <i>Responsible consumption and production</i>
	Goal 6 <i>Clean water and sanitation</i>	Goal 13 <i>Climate action</i>
	Goal 7 <i>Affordable and clean energy</i>	Goal 15 <i>Life on land</i>
	Goal 8 <i>Decent work and economic growth</i>	Goal 16 <i>Peace, Justice and Institutions</i>
	Goal 9 <i>Industry innovation and infrastructure</i>	
	<u>UN Framework Convention on Climate Change (UNFCCC) (1992)</u>	
	Sets out to achieve stabilisation of greenhouse gas concentrations in the atmosphere at safe levels.	
	<u>UNFCCC Kyoto Protocol (1997)</u>	
	The Kyoto protocol commits the UK to specifically set targets to limit or reduce greenhouse gas emissions. The protocol seeks a total cut in greenhouse-gas emissions of at least 5% from 1990 levels in the commitment period 2008-2012 (8% for EU/12.5% for UK).	
	<u>UNFCCC Doha Amendment to the Kyoto Protocol (2012)</u>	
	The Doha amendment to the Kyoto Protocol added a second commitment period to reduce GHG emissions by at least 8% below the 1990 levels in the 8 year period from 2013 to 2020.	
	<u>United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002)</u>	
	Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.	
	<u>United Nations Paris Climate Change Agreement (2015):</u>	
	International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.	

European Union (EU)	<p><i>Despite the UK's withdrawal from the European Union, provisions have been transposed for the continued effect of EU directives in UK law under the European Union (Withdrawal) Act 2018. As such, the Plan should ensure it meets the requirements of these directives.</i></p> <p><u>European Landscape Convention 2004</u></p> <p>Promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention came into force March 2004.</p> <p><u>Convention for the Protection of the Architectural Heritage of Europe</u></p> <p>The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage. It establishes the principles of "European co-ordination of conservation policies" including consultations regarding the thrust of the policies to be implemented.</p> <p><u>European Convention on the Protection of Archaeological Heritage</u> (1992)</p> <p>This convention is concerned in particular with arrangements to be made for co-operation among archaeologists and town and regional planners in order to ensure optimum conservation of archaeological heritage.</p> <p><u>Initial Directive of 1985 85/337/EEC and amendments codified by 2011/92/EU Assessment of the Effects of certain Public and Private Projects on the Environment</u></p> <p>Establishes the requirements to undertake an Environmental Impact Assessment (EIA) of specified projects likely to have a significant impact on the environment.</p> <p><u>Renewed EU Sustainable Development Strategy (EU SDS) (2006) and 2009 review; and linkage to the Europe 2020 Strategy and the international SD Agenda</u></p> <p>Provides a definition of sustainable development "<i>to meet the needs of the present generation without compromising those of future generations.</i>" The priorities are to: combat climate change; ensure sustainable transport; address threats to public health; manage natural resources more responsibly and stop biodiversity decline; combat poverty and social exclusion; and meet the challenge of an ageing population. The Europe 2020 Strategy was adopted in 2010 to move Europe towards smart, sustainable, and inclusive growth.</p>
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Environment Action Plan to 2020, the 7th EAP that will be guiding European environment policy until 2020

Identifies three key objectives:

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

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

The Directive set objectives for ambient air pollution and provides a framework for subsequent ("daughter") Directives to set long-term air quality objectives and limit values for various pollutants to be met by various dates between 2001 and 2010.

This new (2008) Directive includes the following key elements:

- that most of existing legislation be merged into a single directive (except for the fourth daughter directive) with no change to existing air quality objectives*
- new air quality objectives for PM_{2.5} (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target
- the possibility to discount natural sources of pollution when assessing compliance against limit values
- possibility for time extensions of three years (PM₁₀) or up to five years (NO₂, benzene) for complying with limit values, based on conditions and the assessment by the European Commission

The EU Water Framework Directive (2000/60/EC)

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

Directive 2006/118/EC on the protection of groundwater against Pollution and Deterioration

This Directive is designed to prevent and combat groundwater pollution. Its provisions include:

- criteria for assessing the chemical status of groundwater.

- criteria for identifying significant and sustained upward trends in groundwater pollution levels, and for defining starting points for reversing these trends.
- preventing and limiting indirect discharges (after percolation through soil or subsoil) of pollutants into groundwater.

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

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

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

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

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

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

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

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

[European Union Biodiversity Strategy to 2020](#)

There are six main targets, and 20 actions to help Europe reach its goal. Biodiversity loss is an enormous challenge in the EU, with around one in four species currently threatened with extinction and 88% of fish stocks over-exploited or significantly depleted.

The six targets cover:

- Full implementation of EU nature legislation to protect biodiversity
- Better protection for ecosystems, and more use of green infrastructure
- More sustainable agriculture and forestry
- Better management of fish stocks
- Tighter controls on invasive alien species
- A bigger EU contribution to averting global biodiversity loss

[EU Birds Directive \(79/409/EC\) - The Birds Directive 2009/147/EC codified version of Directive 79/409/EEC as amended](#)

The directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds.

[EU SEA Directive \(2001/42/EC\)](#)

Carry out strategic environmental assessment as an integral component of plan making.

Table 3 - National, Regional and Local Strategies, Programmes, Plans and Policies (see Appendix 1 for more detailed information)

Ref No	Document Title and link
National	
1.	National Planning Policy Framework National Planning Practice Guidance
2.	Securing the future - delivering UK sustainable development strategy (UK Gov, 2005)
3.	Climate change: second national adaptation programme (2018 to 2023)
4.	Climate Change: The UK Programme 2006
5.	Cutting carbon, creating growth: making sustainable local transport happen – Transport white paper January 2011
6.	The air quality strategy for England, Scotland, Wales and Northern Ireland (Volume 1, 2007; Volume 2, 2011)
7.	Our Energy Future, Creating a Low Carbon Economy (Energy White Paper, DTI 2003)
8.	Planning for our electric future: a white paper for secure, affordable, and low-carbon energy (DECC, 2011)
9.	Waste Management Plan for England (DEFRA, 2021)
10.	Resources and waste strategy for England (DEFRA, 2018)
11.	Waste Prevention Programme for England (DEFRA, 2013)
12.	National Policy for Waste (2014)
13.	Tall buildings. Historic England Advice Note 4 (2022)
14.	BREEAM Assessment (BRE 2006)
15.	Biodiversity 2020: A strategy for England's wildlife and ecosystem services - UK Post 2010 Biodiversity Framework
16.	A Green Future: Our 25 Year Plan to Improve the Environment, DEFRA 2018
17.	Working with the Grain of Nature: A Biodiversity Strategy for England (2002)
18.	Fair Society, Healthy Lives, The Marmot Review, 2010

Ref No	Document Title and link
19.	Health Equity in England: The Marmont Review 10 Years On, 2020
20.	Reuniting Health with Planning. Series of publications by TCPA, TCPA 2010 – 2017)
21.	Planning policy for traveller sites (DCLG, 2015)
22.	The Community Infrastructure Levy Regulations 2010 and amendments 2019
23.	Thames catchment abstraction licensing strategy (Environment Agency, 2019)
24.	Guidance – Land contamination risk management (LCRM), Environment Agency, 2020 and updated 2021
25.	Thames Region Catchment Flood Management Plan – Summary Report Environment Agency, 2009
26.	Bringing your rivers back to life – A Strategy for restoring rivers in North London (Environment Agency, 2006)
27.	Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1 (Second Edition), 2019
28.	Streets for All: London (Historic England, 2018)
29.	Heritage Works – A toolkit of best practice in heritage regeneration (BPF, Historic England, RICS, 2017)
30.	The Setting of Heritage Assets – 2nd Edition (Historic England, 2017)
31.	Local Green Infrastructure: Helping communities make the most of their landscape, September 2011
32.	Historic England Advice Note 3: Site Allocations in Local Plans, 2015
33.	Equality Act 2010
34.	Wildlife and Countryside Act 1981
35.	Flood and Water Management Act 2010
36.	Environmental Protection Act 1990
37.	Policy statement: Planning for schools development, Department for Communities and Local Government, MHCLG, August 2011
38.	Written Ministerial Statement: Sustainable Drainage Systems, MCLG (2014)
39.	Circular 01/09 – Rights Of Way, DEFRA (2009)

Ref No	Document Title and link
40.	Ancient Monuments & Archaeological Areas Act, 1979
41.	Planning (Listed Buildings & Conservation Areas) Act 1990
42.	Planning Act 2008
43.	Planning and Compulsory Purchase Act 2004
44.	Planning and Energy Act 2008
45.	Localism Act 2011
46.	Energy Act 2013
47.	Infrastructure Act 2015
48.	Housing and Planning Act, 2016
49.	The Heritage Statement 2017, DCMS (2017)
50.	Transport Investment Strategy, DfT (2017)
51.	Cycling and walking investment strategy DfT (2017)
52.	Homelessness Reduction Act 2017
53.	Neighbourhood Planning Act, 2017
54.	Clean Growth Strategy BEIS (2017)
55.	Future of Mobility: Urban Strategy DfT (2019)
56.	Secured by Design: Homes 2023, Police
57.	Climate Change Act 2008 (target amended by law in 2019)
58.	Clean Air Strategy Defra (2019)
59.	Enabling Development and Heritage Assets Historic Environment Good Practice Advice in Planning Note 4, Historic England, 2020
60.	The Building Safety Act 2022
61.	Flood and coastal erosion risk management Policy Statement Defra (2020)
62.	The Ten Point Plan for a Green Industrial Revolution BEIS PMO (2020)
63.	Energy White Paper: Powering our net zero future BEIS (2020)
64.	National Infrastructure Strategy, HM Treasury (2020)
65.	Gear Change – A bold vision for cycling and Walking DfT (2020)
66.	A Plan for Jobs 2020, HM Treasury (2020)
67.	Environment Act 2021

Ref No	Document Title and link
68.	Sustainable warmth: protecting vulnerable households in England BEIS (2021)
69.	Build Back Better: our plan for growth, HM Treasury (2021)
70.	Healthy Lives, Healthy People: our strategy for public health in England, DHSC (2010)
71.	PHE Strategy 2020 to 2025, PHE (2019)
72.	The Housing White Paper “Fixing our broken housing market”, DCLG (2017)
73.	Planning for the Future White Paper MHCLG (2020)
74.	Laying the foundations: a housing strategy for England, MHCLG (2011)
75.	Select Committee on Public Service and Demographic Change Report: Ready for Ageing? (2013)
76.	Introduction to the Green Infrastructure Framework – Principles and standards for England, Natural England, 2023
London	
77.	The London Plan 2021
78.	The Mayor’s Transport Strategy 2022
79.	The Mayor’s Economic Development Strategy for London, 2018
80.	London Housing Strategy, 2018
81.	Zero carbon London: A 1.5°C compatible plan, GLA (2018)
82.	London Environment Strategy 2018
83.	London Health Inequalities Strategy, 2018
84.	Health Inequalities Strategy Implementation Plan 2021-24, GLA, 2021
85.	London Sustainable Drainage Action Plan, 2016
86.	London Infrastructure Plan 2050
87.	All London Green Grid, 2012
88.	Accessible London: Achieving an inclusive environment, 2014
89.	The Mayor’s Housing SPG 2016
90.	The Mayor’s Sustainable Design and Construction SPG, 2014
91.	Social Infrastructure SPG, 2015

Ref No	Document Title and link
92.	Shaping neighbourhoods: play and informal recreation, 2012
93.	Shaping neighbourhoods: Character and context, 2014
94.	London View Management Framework SPG (March 2012)
95.	Assessing Future Potential Demand for Older Persons Housing, Care Homes and Dementia Housing in London, Three Dragons (on behalf of GLA), 2017
96.	London Town Centre Health Check Analysis, GLA, 2018
97.	Town Centres SPG, GLA, 2014
98.	London Office Policy Review, GLA, 2017
99.	The 2017 London Strategic Housing Land Availability Assessment (SHLAA) (Part of the London Plan Evidence Base), GLA, 2017
100.	The 2017 London Strategic Housing Market Assessment (Part of the London Plan Evidence Base), GLA, 2017
101.	Homes for Londoners – Affordable Housing and Viability SPG, GLA, 2017
102.	Culture and the night-time economy SPG, GLA, 2017
103.	Healthy Streets for London, TfL, 2017
104.	North London Waste Plan, 7 London Boroughs, 2022
105.	Planning for Equality and Diversity SPG, GLA, 2007
106.	CAZ Futures Action Plan, GLA & Central London Forward and six boroughs including Camden, 2022
107.	Good Growth by Design- Forward Plan, GLA, 2017 and associated projects and policies
108.	London Recovery Programme, GLA, 2020
109.	Air Quality Positive SPG, GLA, 2023
Local	
110.	We Make Camden (2022)
111.	The Way We Work (2022)
112.	Camden Local Plan, 2017
113.	Camden Planning Guidance
114.	Camden Site Allocations, Local Development Document (2013)

Ref No	Document Title and link
115.	Fitzrovia Area Action Plan, 2014
116.	Euston Area Plan, 2015
117.	Draft Euston Planning Brief, 2020
118.	Euston Area Plan: A new plan for the Euston area, proposed updates for consultation, 2023
119.	Conservation Area Appraisal and Management Strategies
120.	Planning Frameworks and Briefs
121.	Redington Frognal Neighbourhood Plan, 2021
122.	Camley Street Neighbourhood Development Plan, 2021
123.	Dartmouth Park Neighbourhood Plan, 2020
124.	Hampstead Neighbourhood Plan, 2018
125.	Highgate Neighbourhood Plan, 2017
126.	Fortune Green and West Hampstead Neighbourhood Plan, 2015
127.	Kentish Town Neighbourhood Plan, 2016
128.	Camden Character Study
129.	Camden and Islington Strategic Housing Market Assessment, ORS 2016
130.	Financial Viability Study, BNP Paribas 2016
131.	Employment Land Study, URS 2014
132.	Camden Retail and Town Centre Study 2013 - GVA
133.	Kentish Town Regis Road Employment Area Growth Study, Aecom 2015
134.	London Borough of Camden Infrastructure Study, Troy Planning & Design, 2019
135.	Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014
136.	Camden Strategic Flood Risk Assessment (SFRA), 2014
137.	London Borough of Camden Annual Monitoring Reports
138.	Supporting people, connecting communities: Our strategy for living and ageing well in Camden (2020)
139.	Homelessness and Rough Sleeping Strategy 2019-2024
140.	Camden Climate Action Plan 2020-2025

Ref No	Document Title and link
141.	Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041 (2019)
142.	Camden and Islington Parks for Health Strategy 2022 – 2030
143.	Camden Tree Planting Strategy, 2020-2025
144.	‘Creating space for nature in Camden’, LB Camden (2022)
145.	Review of Sites of Importance for Nature Conservation (SINC), London Wildlife Trust 2014
146.	Borough Wide Heat Demand and Heat Source Mapping, Buro Happold 2015
147.	Annual School Places Planning Report (Primary, and Secondary & SEND) 2021
148.	Camden Open Space, Sport and Recreation Study Review; Atkins; 2014
149.	Camden Joint Strategic Needs Assessment, 2019 factsheets
150.	Draft Camden Clear Air Strategy 2019-2034 & Camden Clear Air Action Plan 2022-2026
151.	Retrofitting Planning Guidance (2013)
152.	Supporting people, connecting communities: our strategy for living and ageing well in Camden, 2020

Chapter 3: Summary of the Baseline

- 3.1 Information on the existing environmental, social, and economic conditions in the Plan area provides a baseline against which the Plan's effects can be assessed in the SA and monitored during the Plan's implementation. This section presents an overview of the baseline information that is considered to be of most relevance to the new Local Plan.
- 3.2 Baseline information was previously collated for the SA scoping report for the 2017 Camden Local Plan and the 2020 draft Site Allocations Local Plan, and this has been used as the starting point to collate baseline data here. This information has been revised and updated to make use of the most recent available information sources, and these sources have been referred to in footnotes. The revised and updated baseline data set out in this section reflects the scope of the Local Plan Review.
- 3.3 Most information contained in this section will be broad and relate to the wider local authority area. There is a great deal of available information and demographic and statistical indicators that could be listed, but as stated in SEA guidance, the level of information should be relevant and appropriate to the spatial scale of the plan (The Practical Guide to Strategic Environmental Assessment, 2005).
- 3.4 The baseline topics and issues listed are intended to correlate as closely as possible with indicative SEA Directive and guidance headings of: population and human health, biodiversity, fauna and flora, soil, water, air, climatic factors, material assets and cultural heritage and landscape. There will inevitably be a degree of interrelationship between the issues.
- 3.5 Whilst identifying current baseline data and trends may be relatively straightforward, there will be underlying uncertainty in projecting analysis so far forward on the basis of the current information available. Any identified trends will tend to be short to medium term. There may be significant changes to Camden as a whole in the longer term, which cannot be accurately predicted or forecast. This highlights the need to monitor and review the baseline information periodically after the SA has been completed.
- 3.6 The baseline information has been collected under a number of subtopics, which can be classified as environmental, social or economic. To demonstrate how the SEA topic areas (as set out in Annex 1 of the SEA Directive) have been covered, these are included in brackets beside the relevant SA subtopic as follows:

Table 4 - Baseline subtopic areas

Environmental	<ul style="list-style-type: none"> • Transport and connections (<i>air, human health, climatic factors</i>) • Cultural heritage and landscape (<i>cultural heritage, landscape</i>) • Development on previously developed land (<i>material assets, soil</i>) • Natural environment (<i>landscape, biodiversity, flora and fauna, soil, human health</i>) • Air quality (<i>air, human health, climatic factors</i>) • Water and flooding (<i>water, climatic factors</i>) • Climate factors (<i>climatic factors</i>) • Recycling and waste management (<i>population, human health, water</i>)
Social	<ul style="list-style-type: none"> • Population (<i>population</i>) • Health and wellbeing (<i>human health</i>) • Community (<i>human health</i>) • Deprivation and social exclusion (<i>population</i>) • Education (<i>population</i>) • Housing (<i>material assets, population</i>)
Economic	<ul style="list-style-type: none"> • Economic growth • Employment • Business sectors

3.7 Under each of these subtopics, a number of baseline indicators have been identified. It is these indicators that have been used to describe the baseline situation and will be used measure the performance of the new Local Plan against the SA objectives. Appendix 2 sets out the indicators that describe the various elements of Camden's environment. These have been selected as they are considered to provide a comprehensive picture of the borough, as it is now, and would be able to be monitored in the future, to measure the progress of the Local Plan and site allocations in achieving sustainable development.

Environmental

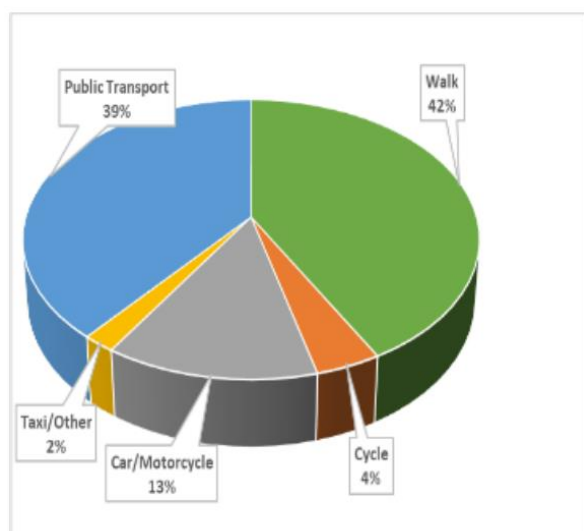
Transport and connections

- 3.8 The Camden Transport Strategy 2019 – 2041 aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The strategy includes four sub documents including: Cycling Action Plan; Walking and Accessibility Action Plan; Electric Vehicle Charging Point Action Plan; and Road Safety Action Plan. This section will present objectives and data from the Camden Transport Strategy and Review, in addition to other relevant data collected by the Council's Transport team.
- 3.9 Camden West End project is planned to deliver major improvements to Camden's West End. Major changes have already included Tottenham Court Road and Gower Street/Bloomsbury Street becoming two way to traffic, reducing congestion and air pollution and speeding up bus routes. There are new safer provisions for cyclists as well as new and regenerated public and green spaces. The project is providing safer, greener and more attractive streets for residents and visitors helping to attract, sustain and boost local businesses. This includes wider pavements with new high quality materials, the removal of street clutter and new pedestrian crossings.
- 3.10 The Camden Highline is a key opportunity to increase walking. It is a 1.2km long elevated railway that could link Camden Town to King's Cross by a ten-minute walk. Feasibility work has been completed, with cost of scheme estimated at between £30-£35m. The railway may be needed for rail use by TfL and Network Rail again in future, so the project is currently expected to be time-limited.

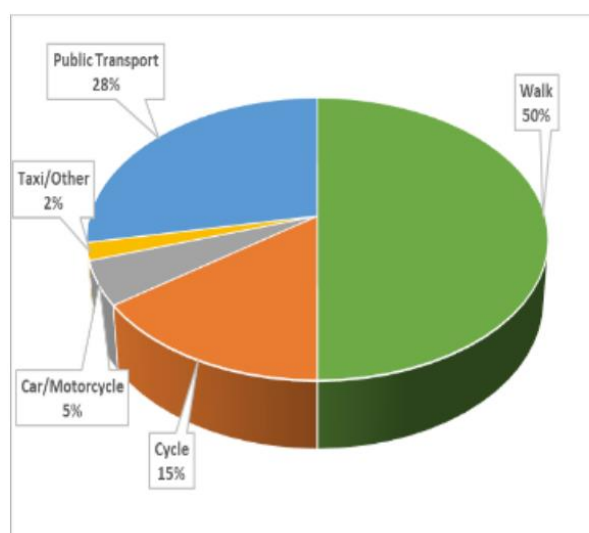
Modal share, proportion of resident trips by walking or cycling

- 3.11 Camden is committed to providing streets and spaces which prioritise vulnerable road users (specifically, pedestrians and cyclists) and public transport modes before private and other forms of motorised vehicles.

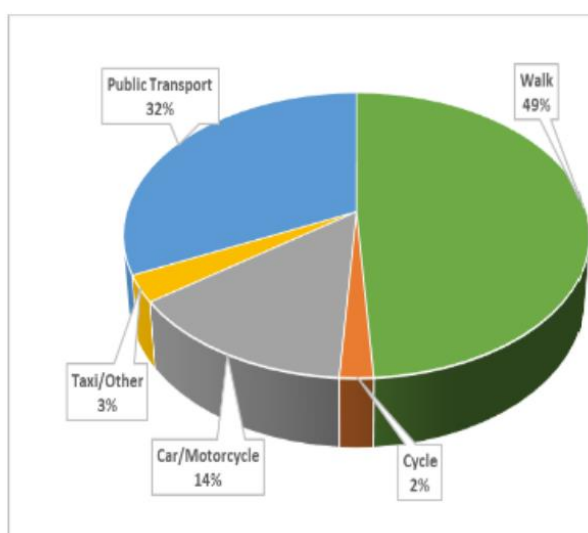
Figure 1 – Modal share data
Baseline (2014/15 to 2016/17)



Target 2041



Current (2017/18 to 2019/20)



3.12 The data above shows transport mode data for Camden, it represents the way in which passengers move. Sustainable modes such as walking and have dropped by 1%; however, mode share for walking meets the local target (with around half of all Camden residents' trips now walked). Cycle levels in terms of mode share amongst residents are still low at just over 2% of all trips.

3.13 Walking is the primary mode of transport for Camden residents and is often the only transport option available. It is also a vitally important mode of travel for the huge numbers of people visiting the Borough each day, often as a means to access public transport, as part of a longer journey.

3.14 Data shows that a much higher percentage of journeys taken by older people are walked compared to younger people, although the distance they cover is much shorter (up to one mile).

3.15 Camden is extremely well served by public transport, particularly in the south of the borough which has some of the highest Public Transport Accessibility Levels (PTAL) ratings in the country. However, the north of the borough has lower public transport provision.

3.16 Other key outcomes to note include:

- With respect of “Vision Zero”, the number of Killed and Seriously Injured (KSIs) road traffic casualties in the Borough has fallen from 182 (2010-2014) to 119 (2021), and so we are on track to meet our 2041 target. All road traffic casualties (KSIs and “slights”) have decreased by about 30% from the baseline (2010-2014) to 2021.
- The percentage of trips made on foot by our residents has also increased. Almost half (49%) of all resident trips are now made by walking, up from 42% in 2016.
- Whilst “mode share” by bike has fallen slightly based on TfL data, more up to date (2021) information from the Active Lives Survey shows growth in cycling frequency amongst our residents compared to the 2016 baseline.
- The number of motor vehicles owned in the Borough has decreased from nearly 50,000 (2016) to just over 40,000 (latest data, 2020).

Proportion and connectedness of segregated cycle lanes

3.17 The Cycle Action Plan includes a planned network of “primary” segregated routes on key corridors in the borough and a “secondary” network on quieter, lower trafficked streets. The Cycle Action Plan commits to rolling out these twin networks (as well as a range of other measures that support more, and safer, cycling).

3.18 Cycle flows in the north of Camden are particularly low. Residents in the north of the borough are further away from the majority of the new high quality cycle infrastructure being delivered, such as the Central London Grid, and this is reflected in lower cycling volumes.

Healthy streets

3.19 London Plan Policy T2 ‘Healthy Streets’ states “Development proposals and Development Plans should deliver patterns of land use that facilitate residents

making shorter, regular trips by walking or cycling”. Since the Camden Transport Strategy was published a number of transformational healthy street changes have been delivered in the borough. The independently-assessed “Healthy Streets Scorecard” indicates Camden is currently the fourth-ranked Borough in the overall metrics under this assessment (behind the City, Islington and Hackney).

- 3.20 As well as removing barriers to walking on a street by street basis, Camden has implemented attractive walking routes around the borough, including Brill Place / Phoenix Road, a parallel route to Euston Road which provides a quieter, safer and less polluted link between St Pancras and Euston Stations. The Regent’s Canal (and pedestrian/cycle links across it) also provides a traffic free route, as do the Borough’s parks and open spaces, and potentially new walking routes such as the Camden High Line.

Bus, rail, and road infrastructure

- 3.21 Public transport provision in Camden is high, with three major railway termini and extensive bus and tube provision.
- 3.22 The London Borough of Camden is very well connected to other parts of London and beyond. There is connectivity with the Thameslink (Brighton/Kent to Peterborough/Cambridge and Bedford) and London Overground networks (parts of the ‘North London Railway’, Gospel Oak-Barking line and local services out of Euston). Key stations on these lines include Kentish Town, West Hampstead, Hampstead Heath and Gospel Oak. In addition, there are 18 tube stations, running on the Central, Circle, Victoria, Hammersmith & City, Metropolitan, Northern and Piccadilly lines. There are also over 63 London bus routes that pass through the Borough.
- 3.23 Two A roads run through part of the Borough. The A41, Finchley Road runs north to south in the western part of the Borough, linking Marylebone with Brent Cross. The A501 runs east to west in the southern part of the Borough, which extends from Paddington to Moorgate and forms part of the inner London ring road.

Transport of goods and services

- 3.24 Freight in Camden includes: road; cycle; rail and water. The Camden Transport Strategy paragraph 3.51 states that “A further significant pressure on carriageway and kerbside space in Camden are freight activities. Deliveries and servicing are essential for the economy: they provide the goods which people need, enable businesses to thrive, and support employment and our High Streets. Such operations can have fewer alternatives to currently used modes of travel, but their impacts can also be significant. A range of measures are needed to ensure that

these pressures are managed in the most efficient and sustainable way, including opportunities for consolidation, re-timing and re-modelling”.

- 3.25 The movement of goods and materials by road can have a significant impact on the environment and the health and wellbeing of residents, in terms of noise disturbance and its contribution to road congestion and air pollution.

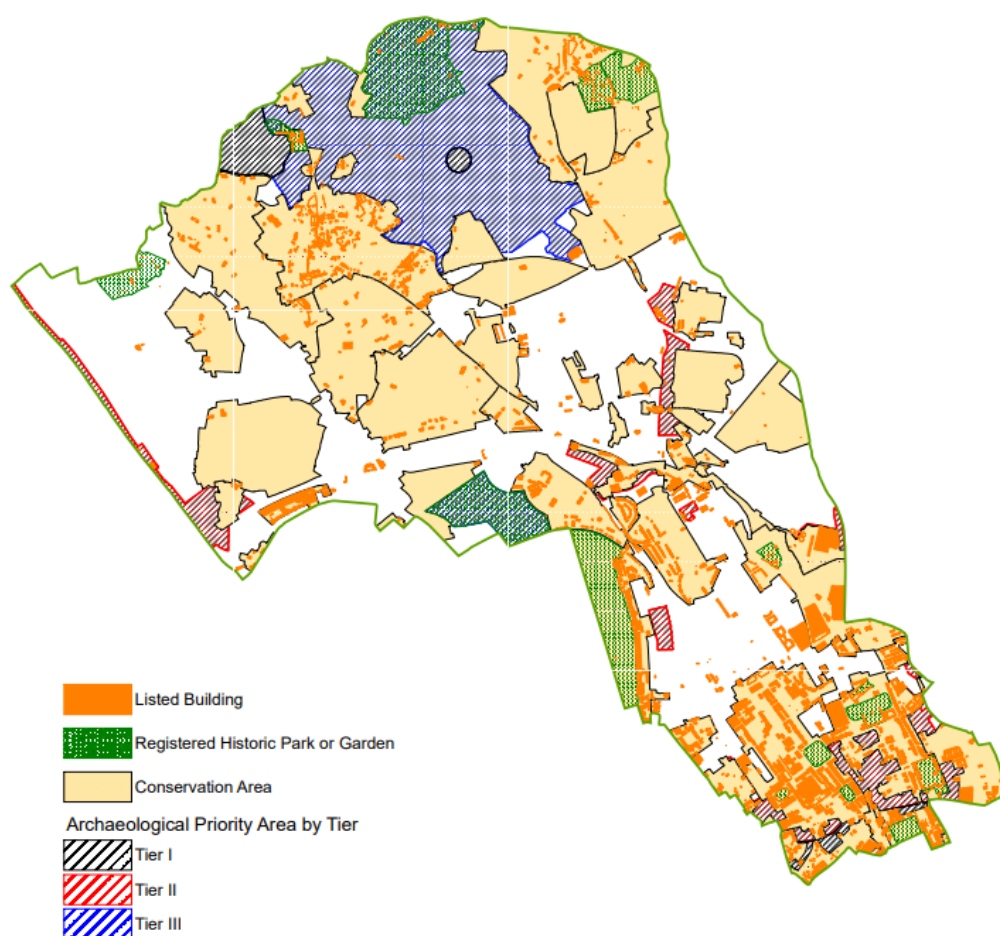
Cultural heritage and landscape

Conservation areas

- 3.26 Camden has a rich architectural heritage with many special places and buildings from throughout Camden’s history. 39 areas, covering much of the borough, are designated as conservation areas, recognising their special architectural or historic interest and their character and appearance.

Designated and non-designated heritage assets

- 3.27 Over 5,600 buildings and structures in Camden are nationally listed for their special historical or architectural interest and 53 of the borough’s squares are protected by the London Squares Preservation Act 1931. In addition, 14 open spaces in Camden are on Historic England’s Register of Parks and Gardens. The Council also maintains a local list of over 400 non-designated heritage assets.

Figure 2 – Heritage and archaeological sites

Extent of archaeological priority areas

3.28 Camden has a generally well-preserved archaeological heritage, with 17 identified archaeological priority areas, although these can be vulnerable to development and changes in land use. The Archaeological Priority Areas are categorised into Tier 1 (West Heath Mesolithic Site; Lundenwic; Parliament Hill), Tier 2 (Hampstead; St Pancras Old Church and Burial Ground; Kentish Town; Watling Street; Post Medieval Cemeteries; Belsize Manor; Kilburn Priory and Settlement; Highgate; Bagnigee Wells; Regents Canal and rail infrastructure; London suburbs), and Tier 3 (Primrose Hill; Hampstead Heath and Parliament Hill Fields; Regents Park). The tier structure is ranked 1 to 4, tier 1 being the highest, and is ranked according to known or strongly suspected to contain a heritage asset of national importance or is otherwise of very high archaeological sensitivity.

Heritage at risk

- 3.29 Heritage at Risk comprises listed buildings and structures that are in a poor condition and often vacant. They need repair, and if vacant, need to be put to a suitable use. The nationwide register of heritage at risk is maintained and published annually by Historic England, with a separate volume published covering London only. The Council identifies buildings and structures at risk and proactively seeks to conserve, and where required, put them back into viable use, including identifying sources of funding.

Strategic and local views

- 3.30 A number of London's most famous and valued views originate in, or extend into, Camden. These are: views of St Paul's Cathedral from Kenwood, Parliament Hill and Primrose Hill; views of the Palace of Westminster from Primrose and Parliament Hills; and background views of St Paul's from Greenwich and Blackheath.
- 3.31 The Council has also identified locally important views that contribute to the interest and character of the borough, these include: views of and from large public parks and open spaces, such as Hampstead Heath, Kenwood Estate, Primrose Hill and Regent's Park, including panoramic views, as well as views of London Squares and historic parks and gardens; views relating to Regent's Canal; views into and from conservation areas; and views of listed and landmark buildings, monuments and statues (for example, Centrepont, St Stephen's, Rosslyn Hill and St George's, Bloomsbury).
- 3.32 The following adopted neighbourhood plans also identify locally important views, these are: Camley Street; Dartmouth Park; Fortune Green and West Hampstead; Hampstead; and Kentish Town.

Natural environment and open space

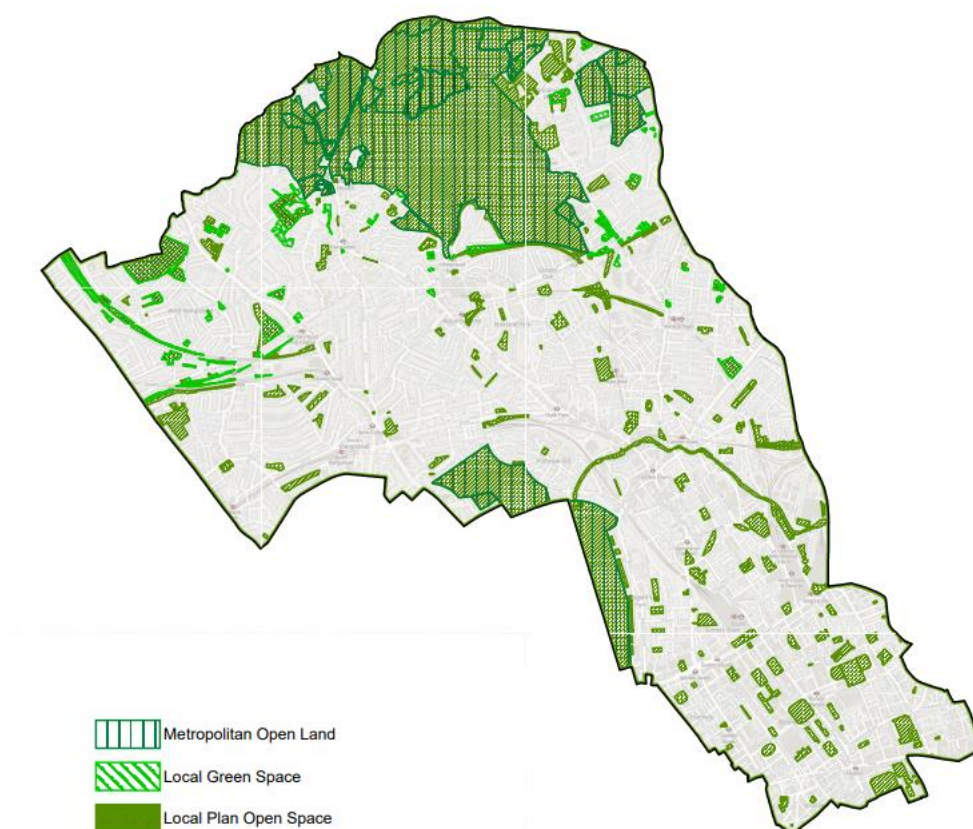
Character of open spaces

- 3.33 Much of the character of the London Borough of Camden comes from its parks and green spaces, from the tree-lined squares in the south, to the wide open space of Hampstead Heath in the north. These areas are extremely important, not just for the wildlife they currently support, but as areas available to all where nature can be experienced. Camden Council manages over 75 parks covering 47 hectares and over 300 housing estates covering over 40 hectares of green space, including a number of green roofs. There are around 100 parks of various size in Camden, covering an area of approximately 400 hectares, though this is not evenly distributed, around two thirds of this area is Hampstead Heath managed by the City of London

Corporation. Other significant areas are managed by The Royal Parks and the Universities.

3.34 In addition to Camden's Local Plan open space designations, communities can protect open space through designating 'local green spaces' in a neighbourhood plan. These are identified below.

Figure 3 - Camden open space designations



Open space deficiency

3.35 The Camden Open Space, Sports and Recreation Study (2014) (to be updated) shows the continuing presence of a number of 'deficiency areas' in the Borough where the local population is farther than 280m (or a 5 minute walk) from a designated public open space. The mapped deficiency areas are shown on Figure 4, Locations deficient in access to open space. There are particularly large areas of deficiency in the west of the Borough and Gospel Oak.

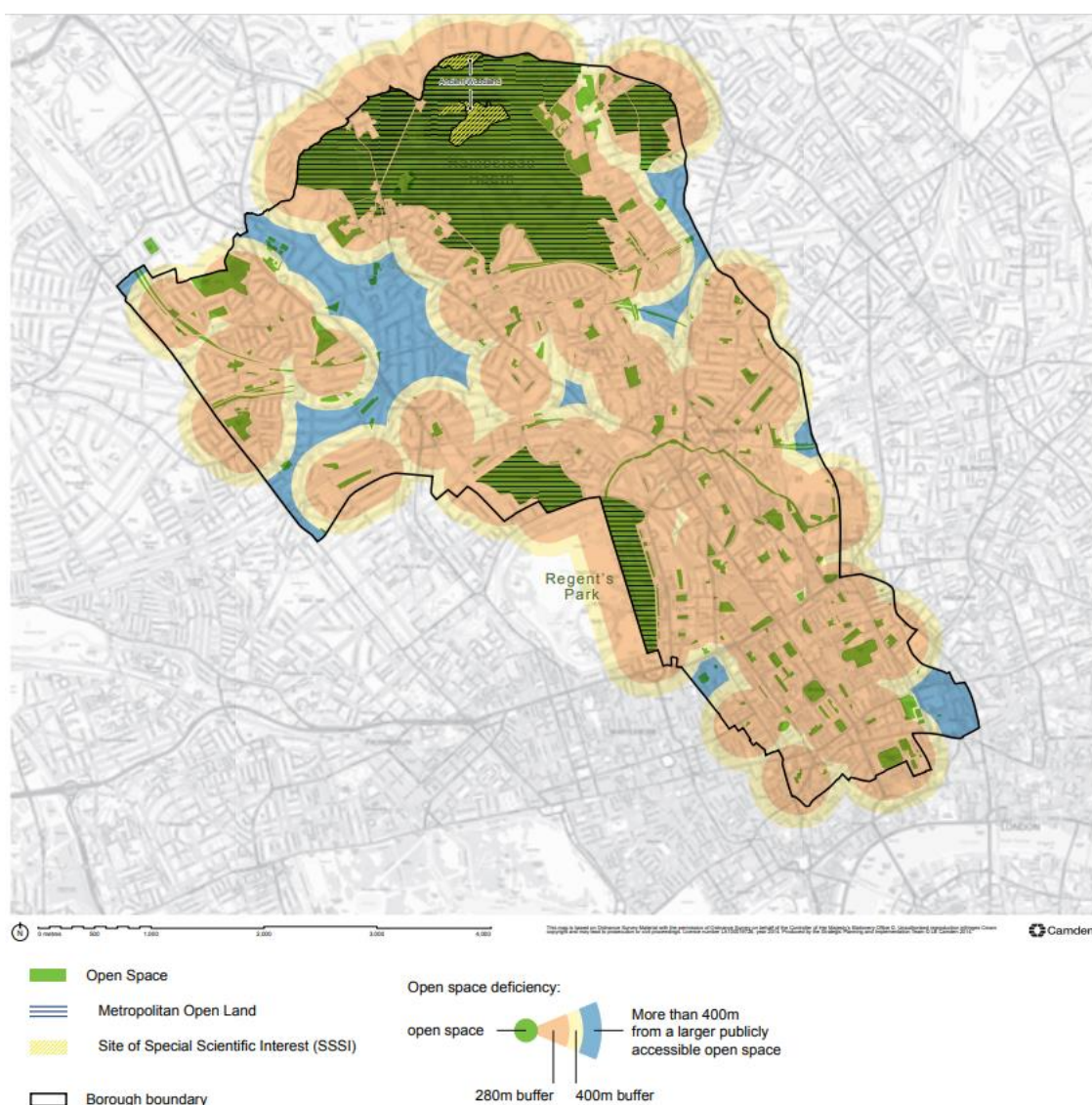
3.36 Areas deficient in access to public parks:

- West – small areas of deficiency in wards of Fortune Green, Kilburn and Swiss Cottage and West Hampstead.
- Hampstead and Highgate – large deficiency areas in the centre of Frognal and Fitzjohns ward. Very small area of deficiency on the south west edge of Hampstead Town.
- Gospel Oak – small deficiency area in Haverstock ward.
- Somers Town – small deficiency area in St Pancras and Somers Town ward.
- Kentish Town – small deficiency area in Kentish Town Ward and Cantelowes wards.
- Central London – small deficiency area in Holborn and Covent Garden.

3.37 The largest access deficiencies (outside 400m catchment area) for children's play provision are located in the following wards:

- West Sub area (Fortune Green / Kilburn wards)
- Belsize / Primrose Sub area (Belsize / Camden Town with Primrose wards)
- Kentish Town (Kentish Town ward)
- Central London (Holborn and Covent Garden ward)
- Gospel Oak (Haverstock ward)
- Hampstead and Highgate (Hampstead Town / Frognal and Fitzjohns wards)

3.38 The Open Space Study maps the areas that do not meet standards for different types of open space (parks, children's play areas, allotments and outdoor sports pitches). The Study advises that deficiency areas should be applied flexibly because they do not take into account local demographics and population density. Nevertheless, the Council considers the deficiency areas to represent a reasonable starting point for identifying where future on-site provision should be prioritised.

Figure 4 - Locations deficient in access to open space (Local Plan, Map 2)

Biodiversity

3.39 Camden's biodiversity strategy 'Creating Space for Nature in Camden' sets out a vision and seven key objectives for the creation of biodiversity in Camden (Designated sites; Habitats; Species; Trees; Parks and green spaces; Access to nature; and Greening the grey). These will be achieved by establishing a Camden Nature Recovery Network and a new Biodiversity Action Plan, which will be developed and delivered by working with organisations across the Borough in a Camden Nature Partnership.

Designated sites

- 3.40 Sites of Special Scientific Interest (SSSIs) are the country's best wildlife and geological sites. Hampstead Heath Woods SSSI, part of the Kenwood Estate managed by English Heritage, is the only SSSI in Camden. SSSI is a statutory designation, and these sites receive a strong level of protection through legislation.
- 3.41 Camden has 38 areas designated as Sites of Importance for Nature Conservation (SINC), covering almost 414 hectares. Some of these are managed by the Council, the rest owned by various organisations, most notably the City of London Corporation, the Royal Parks and Network Rail. These SINCs form the core of Camden's wildlife network and their protection, enhancement and connectivity to surrounding habitat is a priority.
- 3.42 Local Nature Reserves (LNRs) are sites that are important for wildlife and provide local communities with opportunities to access and engage with nature. There are four LNRs in Camden: Adelaide, Belsize Wood, Westbere Copse, and Camley Street Natural Park. As part of the Action Plan the Council will investigate any additional sites that may be suitable for designation as a Local Nature Reserve.

Habitats

- 3.43 Amenity grassland is the most prevalent habitat and is widely distributed across Camden. While it has limited value for wildlife it does offer significant scope for improvement where this does not conflict with other needs. Woodland is the second commonest habitat and supports a wide range of wildlife, mainly in the north of the borough or along railway embankments. There are several habitats in Camden that have declined nationally and are of principal importance for nature conservation. This includes woodland, neutral grassland, acid grassland, reedbeds, heathland, and ponds and canals. The information we have regarding these areas of priority habitat in the borough is from 2014.

Species

- 3.44 A diverse range of species have been recorded in Camden. This includes common and resident species, like blackbirds, recorded over 1,300 times since 1976, to species that have only been recorded once or a few times, which may be rare in the Borough, or hard to find, or both. Some of these species have declined nationally to such an extent that they are considered of principal importance for nature conservation in England. Over 60 of these national priorities have been recorded in Camden, including house sparrows (60% decline in 40 years), toads (68% decline in 30 years), hedgehogs (46% population decline), and stag beetles.

- 3.45 Additional species have been identified not as national priorities but of conservation concern for London, and over a dozen such have been recorded in Camden. These include bats like common pipistrelles and Daubenton's bats and birds including dunnocks, peregrines, black redstarts and song thrushes.

Access to nature

- 3.46 The Biodiversity Strategy notes there are areas within Camden where residents lack sufficient access to the natural environment, defined as more than 1km walking distance from a publicly accessible Borough or Metropolitan Site of Importance for Nature Conservation.
- 3.47 A Government diversity review in 2008 identified disabled people, black and minority ethnic groups, and young people, as having significantly lower levels of access to nature. These groups represent a significant proportion of Camden's diverse population. More recent surveys, undertaken by Natural England, show a similar pattern with respect to ethnicity, and that covid-19 exacerbated existing trends in inequality of access to natural space. For those without access to private outdoor space, or local green space, access to nature has disproportionately disadvantaged certain groups, especially for those who avoided and continues to avoid public transport.

Air quality

- 3.48 The Camden Clear Air Strategy 2019 – 2034 sets out Camden's long-term vision for improving air quality and protecting public health from the effects of air pollution whilst also tackling the disproportionate impact that poor air quality has on some groups. The Strategy provides a framework and vision for statutory Clean Air Action Plans to deliver the short- to medium-term actions and outcomes needed to achieve the long-term objectives.

Air quality targets

- 3.49 Camden will do everything we can to achieve the WHO's updated air quality guidelines throughout the borough by 2034 at the latest:

NO₂: 10µg/m³ by 2034
 PM₁₀: 15µg/m³ by 2030
 PM_{2.5}: 5µg/m³ by 2034

- 3.50 Interim targets to measure ongoing progress:

NO₂: 30µg/m³ by 2026 and 20µg/m³ by 2030

PM10: 20µg/m³ by 2026

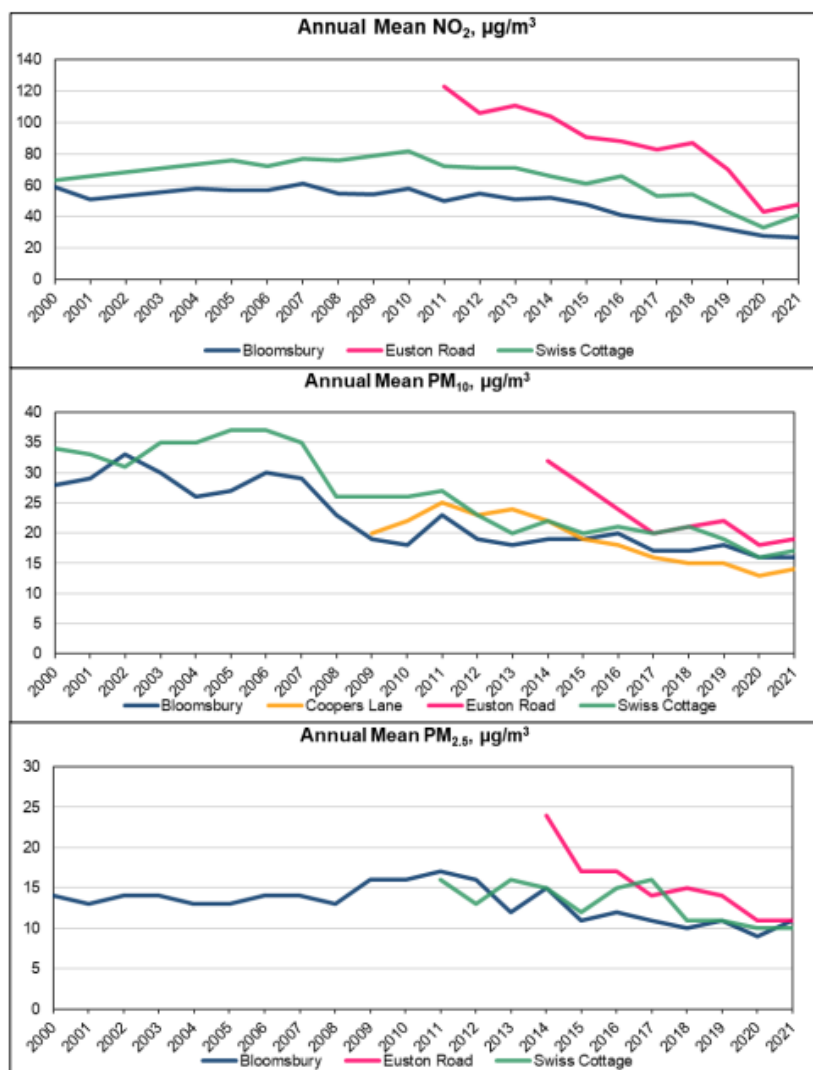
PM2.5: 10µg/m³ by 2030

- 3.51 The Camden Clean Air Action Plan 2023 – 2026 reviews the current state of air quality in the borough, reviews progress, and sets out the actions the Council will take over the next four years.

Air quality data

- 3.52 Our monitoring data shows that NO₂ and PM concentrations have decreased since 2010. The figure below shows annual mean concentrations of NO₂, PM10 and PM2.5 at our automatic monitoring sites. From 2010 to 2019 the last year prior to Covid-19 lockdowns affected traffic levels – NO₂ concentration decreased by at least 45% and PM2.5 decreased by 31%. There was significant variability in PM10, where some monitoring sites recorded a decrease of 27-32%, and the monitoring site in Bloomsbury recorded no change from 2010 to 2019. It is clear that pollution levels can vary enormously from one year to the next, and from one site to another. This is especially the case for NO₂ which is more reactive in the air, meaning that sources of NO₂ have a much more localised effect on air quality and the health of nearby communities.

Figure 5 - Annual mean concentrations of NO₂, PM₁₀ and PM_{2.5} at our automatic monitoring sites

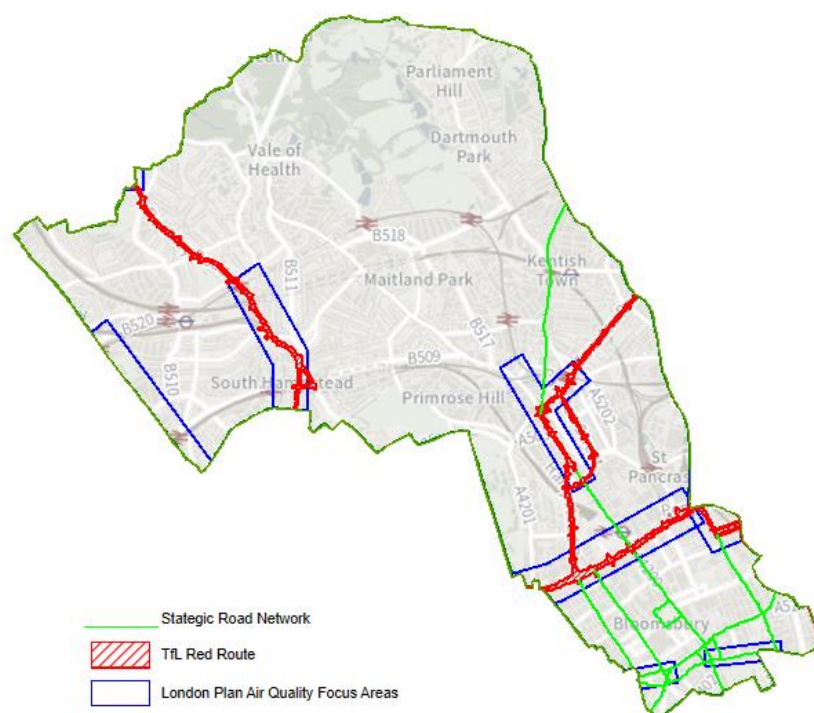


3.53 It is clear that the greatest absolute reduction in NO₂ during the years leading up to 2019 occurred at the Euston Road and Swiss Cottage monitoring sites. These sites are characterised by their proximity to busy roads, and the significant reduction in NO₂ pollution over the past 10 years has largely been driven by measures to reduce road vehicle emissions, including the introduction of progressively tighter engine standards and interventions such as the London Ultra Low Emission Zone (ULEZ). PM₁₀ and PM_{2.5} levels have not reduced as much over this time, and there is greater variability year-on-year. This is due to the significant portion of PM in Camden which comes from sources outside of London, which are affected by weather conditions.

- 3.54 Traffic levels on London's busiest roads decreased by about 50% during the first Covid-19 lockdown in March and April 2020. Because road traffic is a significant contributor to air pollution emissions in Camden, the traffic reduction led to a corresponding reduction in NO₂ air pollution levels during the lockdown period. However, NO₂ concentrations did not reduce to the same extent at non-roadsite sites (such as the Bloomsbury monitoring site), where emissions from building heating systems contribute a proportionally higher share of emissions.
- 3.55 More significant was the fact that particulate levels did not decline during the first lockdown, in spite of the reduction in traffic volumes. Research from Imperial College London determined that this was the result of prevailing weather conditions transporting PM from sources elsewhere in Europe, combined with increased localised and regional PM emissions from domestic wood burning in homes in the UK and garden waste burning as the population spent more time at home, with garden waste collections affected in some areas.
- 3.56 The lockdown demonstrated the immediate benefits for NO₂ air pollution by reducing fossil fuel powered vehicles from roads, but also highlighted the complexity of the air quality health crisis by underlining the fact that more action is needed to reduce air quality as a whole (tackling all sources of air pollution) than simply cutting down on road traffic.

Designations

- 3.57 The whole of Camden is defined as an Air Quality Management Area (AQMA) which was declared by the Council in 2002 to address nitrogen dioxide (NO₂) and particulate matter (PM₁₀) pollution.

Figure 6 – Air Quality Focus Areas

3.58 Air Quality Focus Areas (AQFA) have been designated in Camden, along Euston Road, Swiss Cottage/Finchley Road, Kilburn High Road, Camden High Street, and Holborn. These are areas with high levels of pollution and human exposure.

3.59 The whole of Camden currently exceeds the World Health Organization's guideline limits for air pollution, and this poses a risk for our health.

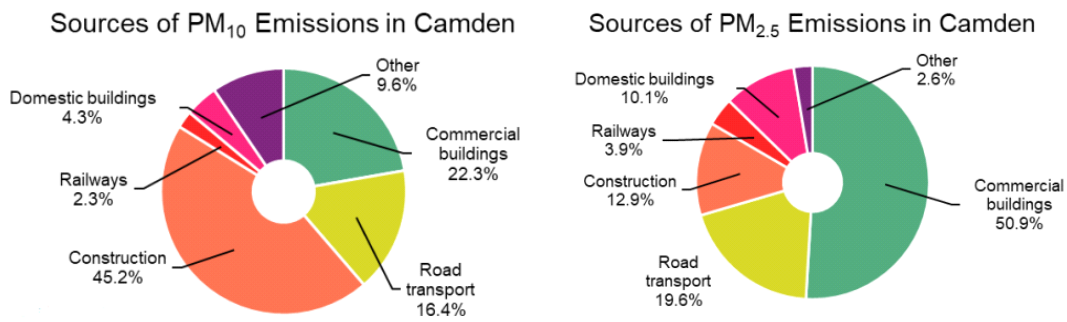
Sources of air pollution in Camden

3.60 Nitrogen oxides (NO_x) is an invisible gas which is produced when fossil fuels, such as gas, petrol and diesel, are burned in air. NO_x includes NO (nitrogen oxide) and NO₂ (nitrogen dioxide). NO₂ is more closely linked to health effects.

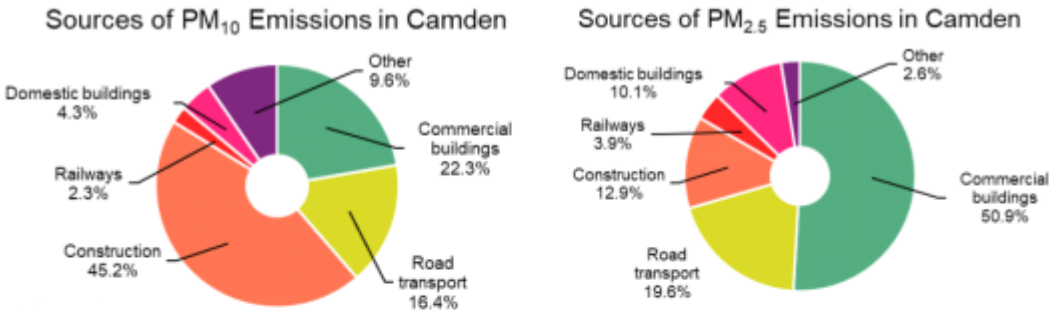
3.61 Particulate matter (PM) is a general term for airborne solid or liquid particles of varying chemical composition and origin. There are natural sources of PM, but we are mostly concerned about human-made PM. Smaller particles can be breathed deeper into the lungs, so when we talk about PM we usually add a number which represents the size of the particles in micrometres, µg (1 µg is one thousand times smaller than a millimetre). So PM₁₀ which is often called 'coarse particulate matter' – means all particles smaller than 10 micrometres, and PM_{2.5} 'fine particulate matter' means all particles smaller than 2.5 micrometres.

3.62 Commercial buildings are the largest source of NO_x (which refers to the combination of NO₂ and nitrogen oxide, NO) emissions in Camden, followed by road transport. Collectively, commercial buildings and road transport produce more than 75% of total NO_x emissions. Construction is the largest source of PM₁₀ emissions in Camden, closely followed by road transport and then construction activity. 'Other' mostly represents dust which had settled on road surfaces but which is disturbed (and becomes airborne) by the movement of passing vehicles. Commercial buildings are by far the largest source of PM_{2.5} emissions in Camden, contributing half of all PM_{2.5} from activities occurring inside the borough. The majority of this is from commercial cooking.

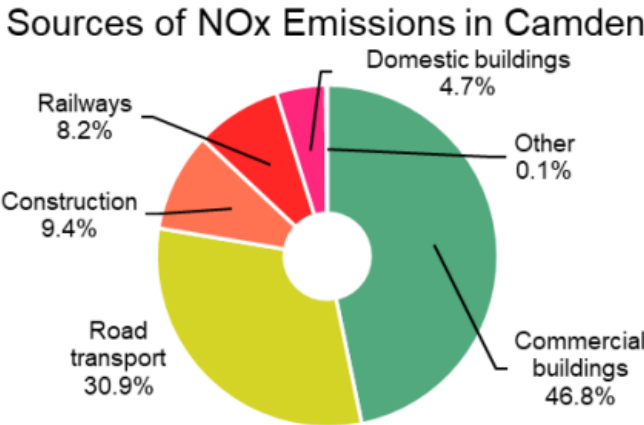
Figure 7 – Sources of NO_x Emissions in Camden



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Water and flooding

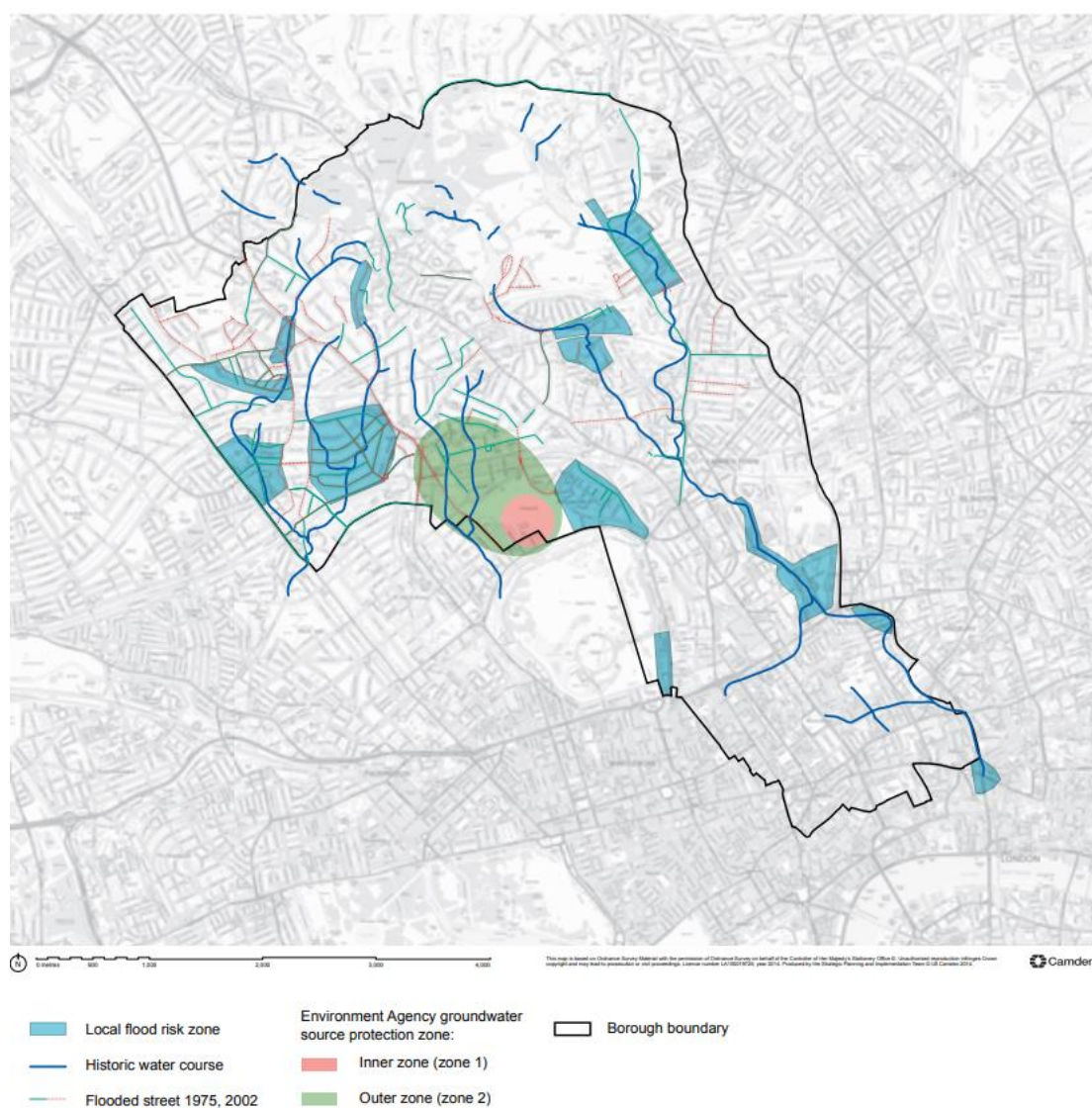
Sources of water

- 3.63 Historically the sources of the Rivers Fleet, Tyburn, Kilburn and Brent were located in the area of Hampstead Heath. In the present day no main rivers are located in the London Borough of Camden following the incorporation of the reaches located within Camden into the Thames Water Utilities Ltd (TWUL) sewer network.
- 3.64 The two sources of the River Fleet feed two chains of ponds on Hampstead Heath: the Hampstead Ponds and the Highgate Ponds. The two branches of the River Fleet historically flowed through Gospel Oak and Kentish Town before converging north of Camden Town. The River subsequently flowed past King's Cross, along King's Road, Farringdon Street and then into the River Thames.
- 3.65 The River Fleet became entirely enclosed in the 19th Century and is now fully incorporated into the TWUL sewer network, eventually out-falling into the River Thames under Blackfriars Bridge. In the 1870s the Fleet Storm Relief Sewer was built to increase the ability of the sewer network to cope during high flow events. TWUL network plans, indicate that the Fleet Storm Relief Sewer begins in proximity to Kentish Town railway station before running roughly parallel to the Fleet Trunk Sewer past Camden Town and St Pancras railway stations, southwards along Grays Inn Road, Hatton Garden and subsequently outfalls into the River Thames.
- 3.66 The Hampstead Ponds, located along the original path of one branch of the River Fleet, connect to the sewer network downstream of Hampstead Number 1 Pond and the Highgate Ponds connect to the sewer network downstream of Highgate Number 1 Pond. Both discharges into the sewer network are limited, restricted by the capacity of the outfall pipe from the two pond chains. The River Kilburn originated at Whitestone Pond in the north-west of Hampstead Heath. The watercourse flowed through Kilburn and into Hyde Park. Here the river formed the Serpentine, and subsequently flowed through Knightsbridge, Sloane Square and into the River Thames. The River Kilburn was culverted in the 19th Century and incorporated into the TWUL sewer network as the Ranelagh Sewer, which discharges into the River Thames at Battersea Park.
- 3.67 The River Tyburn originally flowed from two sources to the south of Hampstead Heath; Hampstead Heath and Shepherd's Well, before converging at Woronzow Road. The river subsequently flowed through Regent's Park and under Buckingham Palace, before splitting and entering the River Thames at two points. The River Tyburn has been incorporated into the TWUL sewer network as the King's Scholar's Main Sewer, outfalling into the River Thames at Pimlico near Vauxhall Bridge. Reservoirs are located at Barrow Hill, Hampstead Heath, Highgate, and Kidderpore.

Outside of Hampstead Heath, significant water bodies within London Borough of Camden include three ponds located within Waterlow Park in the north-west of the Borough.

- 3.68 Regent's Canal enters London Borough of Camden in the east of the borough, to the north of King's Cross railway station, and flows through Camden Town and towards Regents Park to the west of the borough. Regent's Canal is maintained by the Canal and River Trust. A number of lock gates are located along the section of Regent's Canal running through Camden.

Figure 8 - Historic flooding and Local Flood Risk Zones (Local Plan, Map 6)



Water resources

- 3.69 Camden is within Thames Water's London Water Resource Zone – this is classified as 'seriously water stressed.' This means there is a high population with high water

demands and limited water availability, it does not reflect water companies ability to supply water.

- 3.70 Average water use in Camden in 2010-11 was 166.5 litres per head per day (l/h/d) which is above the England and Wales average of 148 l/h/d. Inefficient use of water can lead to unnecessary carbon emissions.

Water quality

- 3.71 Camden has Groundwater Source Protection Zones. The inner zone is located within the south west of Primrose Hill Park and the outer zone covers a section of South Hampstead from Prince Albert Road to Swiss Cottage. These zones are to signal that there are likely to be particular risks posed to the quality or quantity of water obtained, should certain activities take place nearby. These zones should be taken into account when considering the environmental impact of a development.
- 3.72 The Thames River Basin Management Plan seeks to implement the Water Framework Directive in the UK to improve the ecological status of waterbodies in the Thames river basin district whilst also ensuring there is no deterioration in water quality. The water quality of all waterbodies has been assessed based on chemical and biological factors which determine the overall status of a waterbody. The Grand Union Canal and Regents Canal are both identified in the Thames RBMP as artificial waterbodies that are currently failing to reach good ecological potential, their current status is 'moderate.'

Flood risk

- 3.73 Camden experienced significant flooding in 1975, 2002, and 2021 and the probability of such events recurring is likely to increase as a result of climate change (See Map 6, Local Plan 2017).
- 3.74 The following information taken from the Council's Flood Risk Management Strategy 2023 will provide an overview of flooding sources in the borough:

Surface water and sewer surcharge

- 3.75 The majority of London's sewers carry both sewage and rainwater and are referred to as "combined sewers". The main risk of flooding in Camden is from surface water runoff and surcharge flooding from combined sewers which have exceeded their capacity due to heavy rainfall. These two types of flooding often happen at the same time.

- 3.76 Sewer surcharge occurs when the combined sewer is overloaded beyond its design capacity during very heavy rainfall, and sewage is forced back to ground level through manholes or by backing up into properties from the main sewer. Surface water flooding occurs when heavy rainfall overwhelms the drainage system so that water cannot be accepted by sewers, and instead flows overland towards properties.
- 3.77 All new sewers are designed by Thames Water to cope with rainfall events with 3.33% Annual Exceedance Probability (AEP), plus an allowance for anticipated change in peak rain, plus an allowance for anticipated change in peak rain intensity resulting from climate change. Some of the older main sewer network in London, operated by Thames Water, falls below the 3.33% AEP design standard, with implications for those areas.
- 3.78 Intense storms in urban areas that exceed the Thames Water design standard are likely to result in localised flooding, however given that rainfall intensity and its location are impossible to precisely forecast, it is extremely difficult to predict how and when flooding will occur.

Groundwater

- 3.79 Groundwater flooding usually occurs in low lying areas underlain by permeable rock (such as chalk or gravel) and aquifers that allow groundwater to rise to the surface through the permeable subsoil following long periods of wet weather. Low lying areas may be more susceptible to groundwater flooding because the water table is usually at a shallower depth and groundwater paths tend to travel from high to low ground. Groundwater responds slowly to rainfall, but sustained rainfall can lead to saturation and a rising of the water table.
- 3.80 The Lead Local Flood Authority is notified of a small number of groundwater flooding incidents in basements and cellars every year, with a tendency for these to be located in Kilburn, West Hampstead and north Kentish Town, however many incidents may not be reported.
- 3.81 Camden's Strategic Flood Risk Assessment 2014 contains more detailed information about the causes and likely locations of groundwater flooding, which are not considered to have substantially changed since 2014. The main mechanism impacting groundwater levels is the disruption of groundwater flows through basement development. The creation of a barrier in the sub-surface may cause an obstruction to groundwater flow, which can lead to a change in the water table upstream or downstream.

Other sources of flood risk

- 3.82 Camden is considered to be at very low risk of flooding from the sea or rivers. The Environment Agency defines “very low risk” as “a chance of flooding of less than 0.1%” in every year.
- 3.83 The Regent’s Canal is owned by the Canal and River Trust. This has been identified as a low flood risk water body in Camden’s Multi-Agency Flood Plan.
- 3.84 The Maiden Lane Reservoir in Islington is a covered service water reservoir owned by Thames Water which poses a flood risk to Camden. The reservoir has undergone recent reinforcement which will protect the reservoir structure and reduces the risk of reservoir flooding. The Hampstead Heath ponds consist of two chains of earth banked reservoirs and ponds situated on Hampstead Heath. Works were completed in 2016/17 to significantly reduce flood risk from the reservoirs and ponds.
- 3.85 Camden is home to a number of historic rivers including the Fleet and the Tyburn. These rivers were culverted in the 19th century and now form part of the Thames Water drainage network. The River Fleet was incorporated into the sewer network as the Fleet Trunk Sewer, with the Fleet Storm Relief Sewer built in the 1870s to increase the ability of the sewer network to cope during extreme rainfall events. The Fleet Storm Relief Sewer runs through Kentish Town before running roughly parallel to the Fleet Trunk Sewer past Camden Town and St Pancras railway stations, southwards along Gray’s Inn Road, Hatton Garden, Farringdon Road and subsequently outfalls into the River Thames by Blackfriars Bridge. The River Kilburn has been incorporated into the Thames Water sewer network as the Ranelagh Sewer and the River Tyburn as the King’s Scholar’s Trunk Sewer. While the courses of the culverted rivers often correspond with levels of heightened flood risk, this is due to topography (rivers sit in low lying areas) rather than from the river itself.

Climate factors

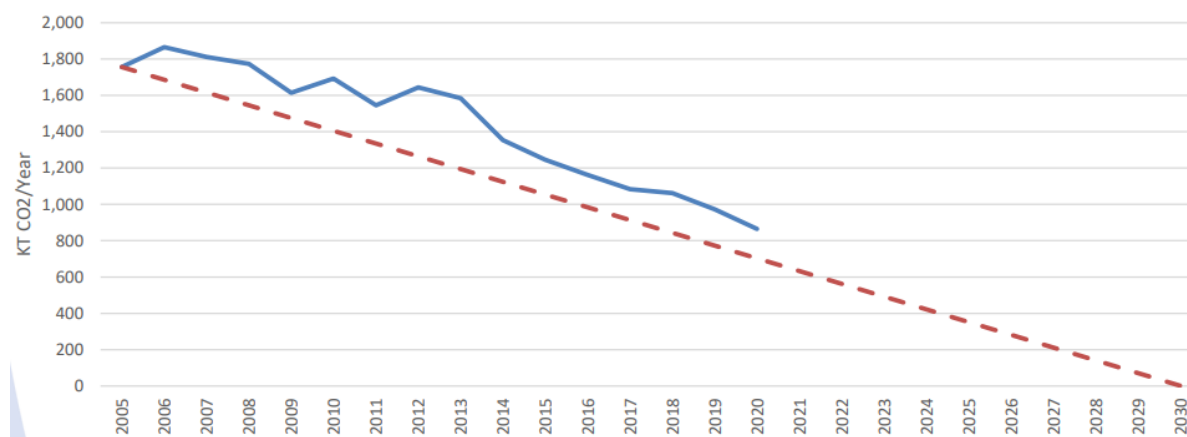
- 3.86 In July 2019, Camden held the UK’s first Citizens’ Assembly on the climate crisis. In November 2019, Camden Council formally declared a Climate and Ecological Emergency, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems, and committed to do everything it can to make Camden net zero carbon by 2030.

Carbon dioxide emissions

- 3.87 The recently published State of the Borough Report noted the following on carbon dioxide emissions.

3.88 Since 2006 borough-wide CO₂ emissions have fallen from over 1,800 kilotons per year to closer to 800 kilotons per year, with the projected trend pointing toward net zero emissions by 2030 (see chart below).

Figure 9 – Projected trends of emissions



Climatic events

3.89 Three key climate risks in Camden are flooding, heatwaves, and drought. Such risks impact the health and wellbeing of Camden's residents and economy.

3.90 The following heat alerts were issued in Camden from 2017 to 2023. This uses a rating between 0 to 4 (1 = green, preparedness; 2 = yellow, readiness; 3 = amber, heatwave action; 4 = red, national emergency).

Table 5 – Heat alert numbers

Year	Month	Level
2017	June	2
2018	July	3
2018	August	3
2019	June	2
2019	July	3
2020	June	2
2020	August	2

2020	August	3
2020	September	2
2021	July	2
2021	July	3
2022	June	2
2022	June	3
2022	July	2
2022	July	3
2022	July	4
2022	August	2
2022	August	3

3.91 Furthermore, Camden experienced significant flood events in 1975, 2002, and more recently in 2021. Following the most recent flood event, the threshold for flood alerts changed in 2021 – instead of Amber alerts these were changed to yellow, which is why there are more.

Table 6 – Flood alerts by year, month, and level

Year	Month	Level
2018	June	Amber
2019	June	Amber
2019	October	Amber
2020	October	Amber
Year	Month	Flood Guidance Statement
2021	June	Yellow
2021	July	Yellow
2021	August	Yellow
2021	September	Yellow
2021	October	Yellow
2022	January	Yellow
2022	February	Yellow

2022	May	Yellow
2022	June	Yellow
2022	July	Yellow
2022	August	Yellow

Energy efficiency

3.92 Camden has a median household energy efficiency rating in line with the London average. Both London and Camden have an average Energy Efficiency Score of 69 which equates to a 'C' rating. Across the borough, there are 13 MSOA (Middle layer super output area) areas with an Energy Efficiency Score which equates to a 'D' rating and 15 MSOA areas that equate to a 'C' rating. Within Camden, the area around Hampstead has the lowest median household energy efficiency score in the borough at 63 (equivalent to a 'D' rating). The highest median household energy efficiency score is in Kings Cross, which has a score of 76 (equivalent to a 'C' rating).

3.93 There are however data gaps in understanding the sources of energy use in Camden, the proportion of solar panels and low carbon heat generation from heat pumps.

Recycling and waste management

Percentage of household waste recycled

3.94 The Camden Local Plan (2017) sets out the aim of increasing recycling and composting in the borough to meet the London Plan target of 50% of household waste recycled by 2020 and 60% by 2031. The North London Waste Plan, adopted 2022, targets are set out in Table 7 below.

Table 7 – Proportion of waste meeting recycling, recovery, and landfill diversion targets 2016 to 2020

Waste stream	Target	2016 baseline	2017	2018	2019	2020
LACW	Contributing towards 65% recycling of municipal waste by 2030	27%	29%	27%	27%	27%
C&I	Contributing towards 65% recycling of municipal waste by 2030	44%	46%	64%	70%	57%
C&D	95% reuse/recycling/recovery	93%	73%	82%	89%	86%
Excavation	95% beneficial use	It is not possible to get this information using publicly available data				

3.95 Data on waste from construction and demolition may be collected more effectively (at the local level) in the future through London Plan Circular Economy Statements and demolition audits.

3.96 The total local authority collected waste for Camden in the reporting period is set out in the table below. The figures below show that recycling of household waste is struggling to push above 30%, not meeting the 50% target.

Table 8 – Local authority collected waste

Year	Total local authority collected waste (tonnes)	Household - total waste (tonnes)	Household - waste sent for recycling/composting/reuse (tonnes)	Household - waste not sent for recycling (residual household waste) (tonnes)	% of household waste recycled	Non-household - total waste (tonnes)	Non-household - waste sent for recycling/composting/reuse (tonnes)	% of non-household waste recycled
2018/19	102,007	56,807	17,652	28,420	31%	45,200	5,610	12%
2019/20	98,348	58,919	15,281	43,638	26%	39,429	5,893	15%
2020/21	84,798	52,268	14,936	37,332	29%	32,530	5052	16%

Source: ENV18 - Local authority collected waste: annual results tables. <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables#history>

3.97 The North London Waste Plan annual monitoring report 2017 – 2020 noted that none of the 2020 recycling or landfill diversion targets are being achieved for any of the waste streams.

Waste arising

3.98 The table below reports waste arising in north London (NLWP annual monitoring report 2017 – 2020). “The waste generated in North London has increased between 2016-2019 which the exception of Local Authority Collected Waste (LACW) which

has reduced. In 2020 waste arisings dropped back to around 2016 levels. Covid 19 may have been a factor in this trend but it is not possible to say without further data. In 2020 actual waste arisings for LACW and Commercial and Industrial waste (C&I) were below the amounts forecast but actual waste arisings of excavation, Construction and Demolition (C&D) and hazardous waste were slightly above that forecast for 2020. Overall the amount of waste arising in 2020 is similar to the amount of waste forecast for 2020.”

Table 9 – Waste arising from North London

Waste	2016	2017	2018	2019	2020	Forecast 2020
LACW	845,776	830,955	818,285	818,693	795,679	987,041
C&I	762,301	733,502	661,327	747,689	759,588	787,440
C&D	443,180	436,195	527,066	759,709	495,151	457,796
Hazardous	53,420	71,923	92,783	84,458	65,026	53,421
Excavation	747,242	1,062,987	1,004,842	1,024,603	784,000	771,888
Total	2,851,919	3,135,562	3,104,303	3,435,152	2,899,444	3,057,586

Data source: Waste Data Interrogator and Hazardous Waste Data Interrogator (2016-2020), NLWP

Social indicators

- 3.99 All statistical outputs from the 2021 Census relate to the population defined as ‘usually resident’ on census day (21 March 2021). Unfortunately, that date was during a period of COVID-19 lockdown and/or restrictions which affected the number of people living in Camden.
- 3.100 At that time, many people were absent who would normally be present, including many students, younger workers, EU nationals and people with access to alternative or second addresses. Although people may have subsequently returned, they will not be seen in the 2021 Census data. ONS hope to make an estimate of those missed and to include these as an adjustment into their revised mid-year population estimates series going forward. This is an experimental process which may be subject to revisions in time. The Office for National Statistics is adamant that the 2021 Census process was robust and their methods worked well to estimate the people living in Camden at the time of the census. It recognises the unique time that the census took place, so results will not reflect completely the people resident prior to the pandemic.
- 3.101 Data sources used in this section include: 2021 Census; [We Make Camden, State of the Borough Report, March 2023](#); [2021 Census, ONS, How life has changed in Camden](#).

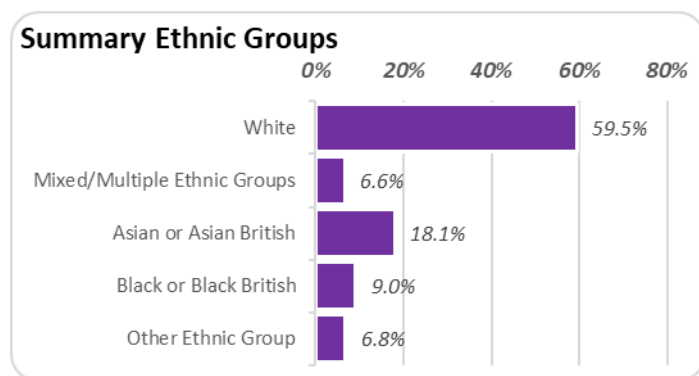
Population

Population, age, and sex

- 3.102 Camden has a comparatively young population, buoyed by a large student population and younger working aged people, rather than by children. The 2021 Census shows that Camden has fewer children aged under 15 (14.1%) compared to London (18.1%) and England (17.4%), and more young people aged 15-24 (includes main Higher Education student ages) (16.2%) than London (12.3%) or England (11.7%). Camden has a large working aged population aged 25-64 (57.6%), similar to London (57.7%), larger than England (52.4%), and relatively fewer older people aged 65 plus (11.8%), similar to London (11.9%), fewer than England (18.9%). The proportion of older people aged 75 plus (5.3%) is the same for Camden and London, but smaller than the proportion for England (8.6%).
- 3.103 Overall, Camden has slightly more females (52.6%) than males (47.4%). Ages 0-14 years, there are more males than females initially, however as age increases, generally, there are more females than males, reaching a 2:1 female to male ratio at age 90 plus.
- 3.104 6.9% of residents identified as gay, lesbian, bisexual or other, compared to 4.3% in London as a whole and 3.2% across England and Wales. 0.8% of respondents in Camden said their gender identity was different from the sex registered at birth – including those that specifically identified as trans or non-binary, did not specify, or specified another gender identity. This compares to 0.5% across England and Wales, 0.9% across London.

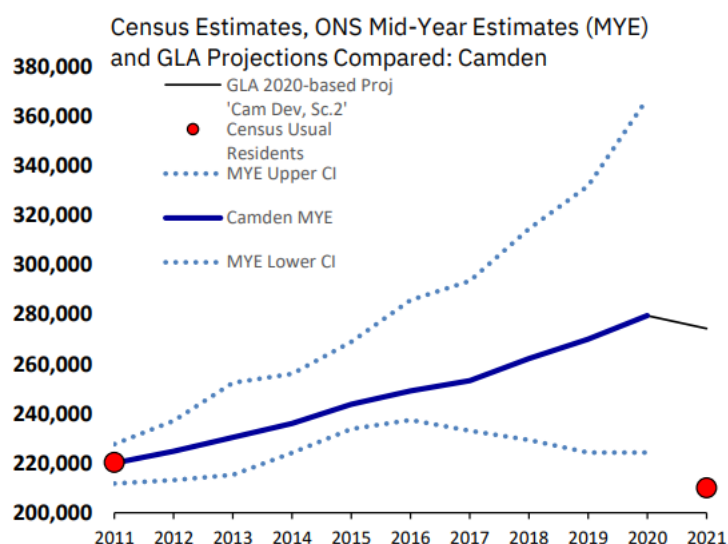
Population by ethnic group

- 3.105 60% of residents identify as being from a white ethnic background, which has reduced from 66.3% in 2011. The second largest ethnic group in Camden is Asian or Asian British 18.1%. 9 % of residents identify as Black or Black British, 6.6% identify as Mixed/Multiple Ethnic Groups, and 6.8% identify as Other Ethnic Group. 45.4% of Camden's usual residents were born outside the UK, an increase from 42.5% in 2011.

Figure 10 – Summary ethnic groups

Population growth

3.106 Between the last two censuses (held in 2011 and 2021), the population of Camden fell by 4.6%, from around 220,300 in 2011 to around 210,100 in 2021. This means Camden was one of only three local authority areas in London to see its population decline, the others were Westminster (-6.9%) and Kensington & Chelsea (-9.6%). The regional population increased by 7.7%, while the population of England increased by 6.6%. Camden has a population density of 9,647 people per square kilometre, ranking ninth highest among London boroughs.

Figure 11 – Census estimates, ONS Mid-Year Estimates and GLA projections

Household size and composition

3.107 In the census, a household is defined as one person living alone or a group of people (not necessarily related), living at the same address who share cooking

facilities and share a living room or dining area. The 2021 Census recorded 92,800 occupied households in Camden. This is a fall of 4.9% since 2011 (-4,700). This compares to a rise of 4.8% across Greater London, and 6.2% across England. It is likely that some households were temporarily away during the census (e.g. students, furloughed and migrant workers). While some will still have been captured on the census at their usual/term-time address, others will not have been.

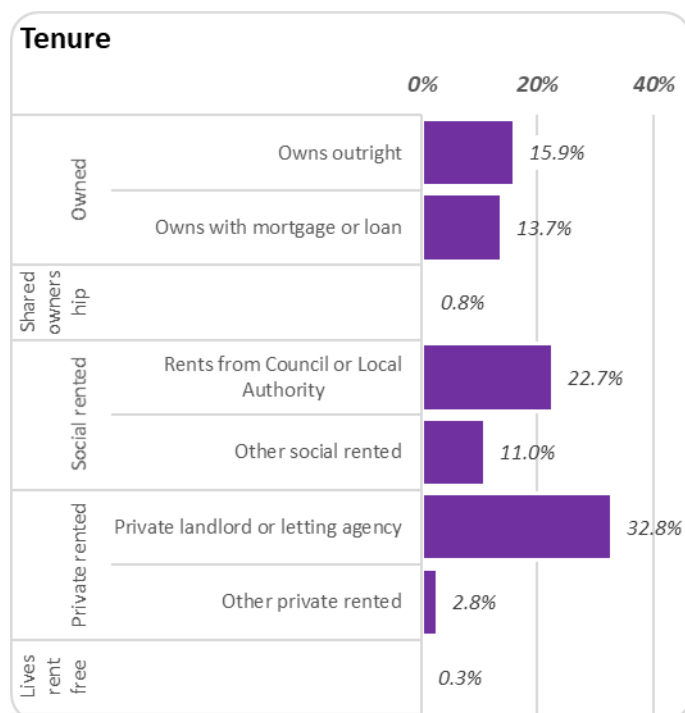
- 3.108 In Camden, the percentage of households including a couple without children rose from 14.7% in 2011 to 15.8% in 2021, while across England it fell from 17.6% to 16.8%. During the same period, the regional percentage increased from 13.8% to 14.2%. The percentage of households including a couple with dependent children in Camden increased from 12.5% to 13.9%, while the percentage of households including a couple with only non-dependent children increased from 2.7% to 3.3%.

Housing

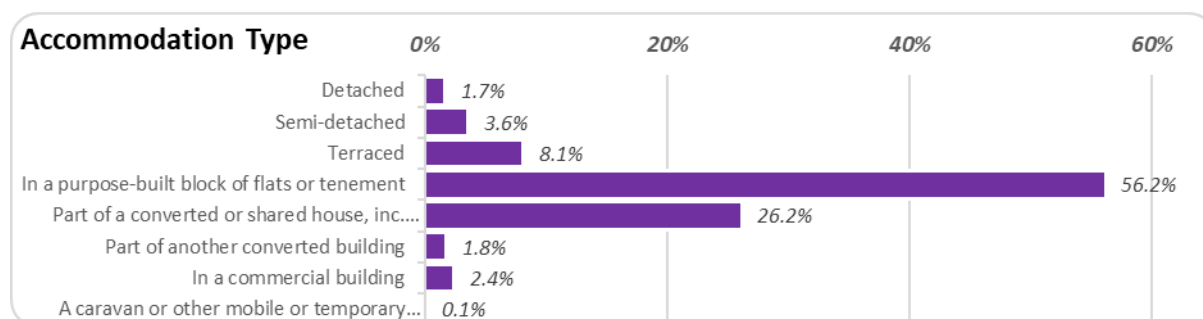
- 3.109 Since the Local Plan was adopted a new London Plan was published in 2021. The London Plan sets Camden a ten-year minimum housing target of 10,380 homes over the period 2019/20 – 2028/29 (an average of 1038 homes per year). The number of new homes delivered in Camden has varied a lot over the last ten years, however since 2017 the number of new homes being approved has fallen below the number of new homes needed to meet our housing target.

Housing stock

- 3.110 In Camden, the percentage of households in the social rented sector rose from 33.1% in 2011 to 33.7% in 2021. During the same period, the regional percentage fell from 24.1% to 23.1%. Private renting in Camden increased from 32.2% to 35.6%, while the rate of home ownership decreased from 32.2% to 29.7%.

Figure 12 – Tenure types

Dwellings by type

Figure 13 – Accommodation type

House prices and rents

3.111 House prices in Camden are amongst the highest in the UK, making housing affordability very low. Prices in the rental market are significantly higher in Camden compared to London and England, for both private and social housing (making up 61% of Camden households). A median house price is currently 22 times higher than median wage, up from 14 times higher in 2008. House prices are significantly higher than the London average and much higher than the England average.

- 3.112 Housing prices across England have risen consistently over the past two decades, but the pace of growth has been different in Camden and London compared to England. Camden has seen a rise of 57% in the past ten years and a small recent decline. In London, the growth rate of house prices was 75% in the past ten years, compared to 55% in England.
- 3.113 The median private market rent in LB Camden for a one-bedroom dwelling is £1,450, which is £250 higher than London median and more than twice as high as in England. This is 55% of London median pay, putting Camden third in terms of rent affordability compared to other London boroughs, with Westminster and Kensington at the top. Over the past two years, mean rental prices in Camden have fallen by 24%, a much steeper fall than in London as a whole, where the mean has fallen by 6%. This is likely due to the COVID-19 pandemic. Median social market rent is £520 in Camden, which is £90 higher than London median and £200 higher than English median.
- 3.114 Camden is in the top five Local Authority areas impacted by rough sleeping in the UK and is second only to Westminster in terms of London rough sleeping numbers. In 2021/22, 666 people were found to be rough sleeping in Camden, and of them 399 were moved into accommodation. Camden's central London location and proximity to national and international transport hubs makes the area vulnerable to high rough sleeping flow. In addition to this high level of rough sleeping, the cohort of people who sleep rough in Camden have multiple needs which adds further challenge. For example, 45% of rough sleepers assessed had mental health conditions and up to 50% are non-UK nationals.

Housing condition

- 3.115 3,220 dwellings in the Private Rented Sector were found to be non decent in Camden in 2020/21. 9.5% of homes in Camden are overcrowded, less than the London average but more than twice as much as England and Wales, whereas the migration of households is higher than in England. There are big gaps in ownership and rental between people from different ethnicity and age groups in Camden and people from Black and Asian ethnic groups are five times more likely to live in overcrowded housing compared to White people.

Number of new homes completed

- 3.116 Over the reporting period 2018/19, 2019/20, and 2020/21 net additional housing completions were significantly below the Camden Local Plan 2017 target. The most marked shortfall was in the year commencing in April 2020, which coincided with the

early months of the Covid pandemic and the initial lockdown. Net completions in 2018/19 and 2020/21 were also significantly below those in the first two years of the Local Plan period. In 2016/17, across self-contained and non-self-contained housing, there were 1,407 additional homes completed, while in 2017/18 there were 854 additional homes completed. The slowdown in housing delivery may partly reflect a relatively sluggish local housing market over this period.

Table 10 – Housing Completions

Financial year	2018/19	2019/20	2020/21
<i>Local Plan target</i>	<i>1,200</i>	<i>1,200</i>	<i>1,200</i>
Self-contained homes	827	985	509
Non self-contained housing	-194	-69	53
Total	633	916	562

Source: Planning Policy Team, LB Camden. Note: vacant homes returning to use are no longer included as a component of housing supply in the London SHLAA 2017 or the London Plan 2021, and do not appear in the Housing Trajectory, but are available in this AMR at Table 13.

Households with special needs

- 3.117 Around 15% of Camden residents are disabled under the Equality Act, higher than the London average of 13.2% but lower than England at 17.5%.

Traveller pitches

- 3.118 There are two permanent sites for gypsies and travellers in the borough, providing four pitches in total. These sites (at Camden Street and Castlehaven Road) are managed by Camden Council. In addition, there is a privately owned site for travelling showpeople at the Vale of Health.

Student housing completions

- 3.119 The Camden Local Plan sets a target for at least 2,400 additional places in student housing over the plan period (2016/2017 to 2030/31), equivalent to 160 places per year. Taking the first five years of the Local Plan period together (2016/17 – 2020/21), completed developments have provided 756 student bedrooms, compared with a cumulative Local Plan target of 800 additional student places.

Affordable housing completions

3.120 Policy H4 also sets an ambitious target for 5,300 additional affordable homes to be delivered over the 15 years from 2016/17 (equivalent to 353 per year), based on past delivery, the Local Plan's housing trajectory, and potential delivery from the Council's Community Investment Programme.

3.121 Table 11 below shows housing and affordable housing delivered each year from 2016/17 to 2020/21, alongside financial contributions received. As illustrated by the table, delivery of housing and the overall proportion of affordable housing vary significantly from one year to another depending on the residential and commercial property markets, the economics of housing development, and changes in the number and scale of the schemes reaching completion. Furthermore, high land values in Camden affect financial viability so it is often difficult to secure the full percentage of affordable housing sought by policy. In order to address any shortfall, the Council often negotiates additional financial contributions in lieu of affordable homes not provided on-site as part of a scheme.

Table 11 - Affordable Housing completed, 2016/17 to 2020/21

Financial Year	Total number of completed self-contained homes including affordable housing		Affordable Housing Completed		Financial contribution in lieu of affordable housing received
	Gross*	Net	Gross	Net	
2016/17	1,395	1,263	151 (11%)	140 (11%)	£11.7m
2017/18	1,102	945	308 (28%)	252 (27%)	£2.9m
2018/19	941	827	266 (28%)	266 (32%)	£1.04m
2019/20	1,121	985	157 (14%)	148 (15%)	£4.40m
2020/21	525*	509*	119 (23%)*	117 (23%)*	£1.62m

Source: London Development Database / + Planning London Database / Housing Flow Reconciliation: calculated using a new GLA / DLUHC protocol – losses count at start, not completion. Note: gross figures include all homes completed, whereas the net figures take into account the number of homes lost through demolition or conversion as part of the development

3.122 Over the monitoring period 2018/19 to 2020/21, over 2,300 additional homes were delivered, of which over 500 were affordable homes (23% of additional homes, equivalent to 177 per year). Housing completions were focussed in the earlier two years (over 40% of all additional homes were delivered in 2019/20), with significantly

lower completions in 2020/21 coinciding with the Covid pandemic. Around half of the additional affordable homes were delivered in 2018/19, reflecting the particular mix of schemes delivering completions that year, including phases Community Investment Programme schemes at Agar Grove, Abbey Road and 30 Camden Street.

3.123 Over the same period, the Council collected over £7 million in financial contributions in lieu of affordable housing, over 60% of which were received in 2019/20.

Mix of housing sizes

3.124 The Council aims to secure a range of suitable housing types, as well as a range of tenures. The table below shows the mix of completed dwelling sizes for each financial year from 2016/17 to 2020/21.

Table 12 – Completed dwelling sizes for each financial year from 2016/17 to 2020/21

	Studio	1-bed	2-bed	3-bed	4-bed	5-bed
2016/17	10%	36%	41%	10%	2%	1%
2017/18	3%	28%	44%	20%	4%	>1%
2018/19	3%	31%	40%	19%	5%	1%
2019/20	3%	34%	42%	17%	3%	1%
2020/21	2%	37%	40%	17%	2%	1%

Source: London Development Database/ Planning London Datahub

Note: Rows may not add to 100% due to rounding

3.125 Overall, there is a varied mix of housing sizes across all tenures. However, the total proportion of studios and one-bedroom homes has steadily increased since 2017/18, from 31% in 2017/18 to 39% in 2020/21. The high proportion of small units is partly due to prior approval applications granted under permitted development rights (where the Council is unable to control the mix of dwelling sizes), and partly because small market homes are subject to greater demand and higher values per sqm.

Health and wellbeing¹

Major causes of death

3.126 There are large inequalities in the pre-75 mortality rate from causes considered preventable in Camden. In 2017-2019, the average standardized mortality ratio in Camden was 130.6 preventable deaths in under-75s per 100,000 population. This was slightly higher than the London average of 125.8, but less than the English average of 142.2. Somers Town has the highest number of preventable deaths in Camden with 180 per 100,000. The Medium Super Output Areas with the lowest number of preventable deaths (40 deaths per 100,000 or lower), are located in some of Camden's most affluent areas, namely South Hampstead, Hampstead Town and Frognal.

Air quality health impacts

3.127 Air pollution causes health difficulties and avoidable deaths. In England, the share of deaths attributable to particulate air pollution is 5.6%, while in London it is 7.1%. This figure is similar across all boroughs in London, and Camden is close to this with 7.2% of deaths attributable to particulate air pollution.

3.128 Admissions of children to hospital for asthma is a measure of the impact of air pollution on children's health. Children and adults from deprived backgrounds are more likely to be exposed to the causes and triggers of asthma, such as smoking and air pollution (Asthma UK, 2021). In Camden, the rate of hospital admissions for asthma for children under 19 years old is lower than other inner London boroughs, at 61.2 per 100,000 population. Two thirds of children being admitted to hospital due to asthma are living in the two most deprived quintiles of Camden, while the least deprived quintiles account for only 15% of admissions.

Proportion of people physically active

3.129 Adults in Camden report above-average activity levels compared to England and London averages at 69.3%, compared to the English and London averages of 65.9% and 64.9%, respectively.

¹ The following information from this section was taken from the 'We Make Camden, State of the Borough Report'

Excess weight in 4-5 and 10-11 year olds

3.130 Obesity is associated with a higher risk for health conditions such as high blood pressure and cholesterol, type 2 diabetes, breathing problems and in children is related also to psychological problems and lower quality of life. In Camden, 1 in 5 children are overweight at 4-5 years; this rises to almost 2 in 5 at 10-11 years. The proportion of overweight and obese children in Camden is broadly similar to London and English averages, the differences are not statistically significant. The proportion of overweight and obese children in Camden has remained the same over the last 15 years. This is in line with the London trend. In terms of reducing obesity at 10-11 years, Camden (and London) outperformed England over the last 15 years. While prevalence of childhood obesity remained similar in Camden and London, it rose by approximately 18% in England as a whole.

Life satisfaction

3.131 Since 2011, the Office for National Statistics has been collecting data on people's subjective wellbeing in the UK, meaning how people feel about their life and how happy they are. Camden has scored below both the English and London average on those well-being estimates most years measured.

3.132 Camden's wellbeing suffered a larger decline compared to England and London during the COVID-19 pandemic – but it also saw much faster recovery to pre-pandemic levels in 2021/22. Anxiety levels in Camden have spiked during the pandemic and kept rising into 2021/22, breaking away from London and England trends. Therefore, anxiety levels did not see such an abnormally rapid post pandemic recovery, on the contrary, they continued rising further. They are now at the highest level in a decade.

3.133 Self-reported loneliness in Camden is substantially higher than in any other inner London borough at 36.3%, with the London average at 23.7% and England at 22.3%. When looking at the national level statistics, younger people tend to report higher levels of loneliness than older people (36% in 16-24-year-olds vs 13% in 75-84-year olds), and women report higher levels of loneliness than men (26% versus 18%).

Camden Primary healthcare estate

3.134 Camden has 34 GP practices operating across the borough – they occupy health centres, domestic premises, and purpose built premises. Of these a number of leases are due to expire in the next five years. The primary care estate in Camden is

owned by a number of different organisations which means its management can be fragmented.

Care homes for older people

- 3.135 The Council had 4 residential care homes in summer 2013 (Wellesley Road, Ingestre Road, Branch Hill, St Margarets). However, in the summer of 2013 both Wellesley and Ingestre Road closed and residents were relocated to the new Maitland Park care home, managed by Shaw Healthcare.
- 3.136 The Council has 3 block contracts for nursing older people at St John's Wood, Landsdowne (over border at Barnet), Ash Court and spot purchase at 3 others: Rathmore House, Compton Lodge and Spring Grove. A number of 'extra care' housing schemes have also been brought forward by the Council, creating over 130 spaces.
- 3.137 The London Plan suggests a benchmark of 105 units per year (2017 – 2029). However, demand for residential and nursing care exceeds in borough supply and we continue to need to spot purchase beds from outside Camden (which is the case for most inner city boroughs where land is scarce and expensive).

Care homes for mental health

- 3.138 The Council has one care home for adults with Mental Health problems – Camden Park House (12 beds) and one nursing home – Mary Wollstonecraft House (9 beds).
- 3.139 Substance Misuse Services are provided at Burghley Road (12 beds) which provides support for alcohol dependency.

Levels of crime

- 3.140 In Camden, 8 criminal offences were committed by children per 1,000 children. When compared with other inner London boroughs, the number of offences committed by children in Camden sees the borough rank within the middle of the inner London geographical region.
- 3.141 Camden has seen intense fluctuation in the level of crime committed within the borough. The number of offences committed in 2021, 101 per 1,000 people is lower than the 150 offences per 1,000 people in 2012. Within that time, however, there have been both dramatic decreases and increases in the number of offences committed in the borough. Crime fell between 2012 and 2014 from 150 offences per

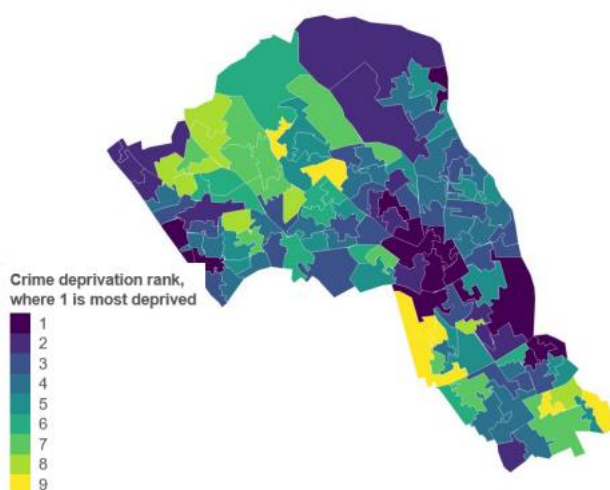
1,000 people to 119 offences per 1,000 people. Levels of crime stabilized through to 2016, before a rapid increase back up to 2012 levels. A similarly sharp decline occurred between 2019 and 2020, falling from 148 offences per 1,000 people to 106 offences per 1,000 people. This is most likely one of the consequences of the Covid-19 lockdown restrictions.

3.142 When compared to other Inner London boroughs, Camden has one of the highest number of offences committed per 1,000 people. Crime data across 2021/22 shows that there were 120 offences committed per 1,000 people in Camden, the third highest in this period.

3.143 Within Camden, the most common offences committed in the borough are those that have the most damaging impact on community cohesion. Theft is the most common criminal offence, with almost 49 thefts committed per 1,000 people. Other common crimes committed in the borough are violence, vehicle offences and public order offences. Camden, however, has low rates of crime amongst some of the most violent crime categories, such as robbery, sexual offences and possession of weapons.

3.144 The Index of Crime Deprivation measures the rate of recorded crime for four major crime types, violence, burglary, theft and criminal damage – representing the risk of personal and material victimisation. In Camden, high levels of crime deprivation are concentrated mostly in the borough's more densely populated areas: Camden Town, Primrose Hill, Kilburn, King's Cross and Somers Town. Low levels of crime deprivation are concentrated in parts of the borough strongly connected to the Night Time Economy, Regent's Park, Bloomsbury and Holborn & Covent Garden, and also the more affluent north of the borough around Hamstead Town and Frognal & Fitzjohns.

Figure 14 – Crime deprivation rank



Deprivation and social exclusion

Household income

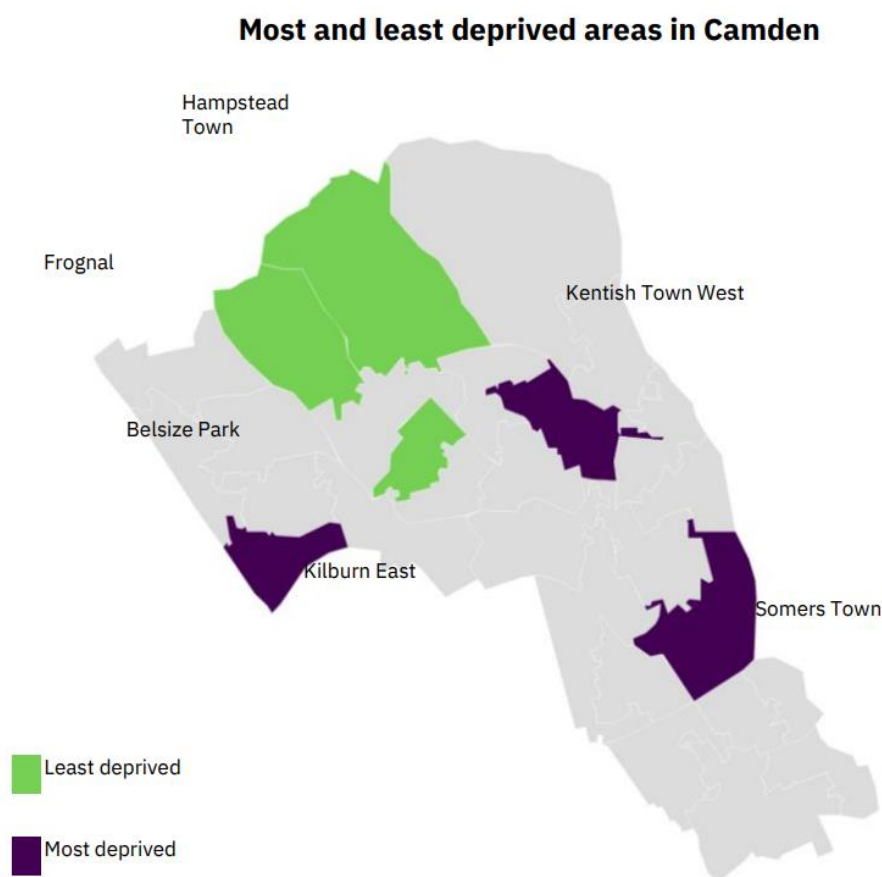
- 3.145 In 2017 Camden had a mean annual household income of £45,507. 9.6% of Camden households earned up to £15k and 21.1% of Camden households had an annual income of £60,000 and over (CACI paycheck, 2017).
- 3.146 According to ASHE (Annual Survey of Hours and Earnings) for 2021, median gross annual pay for full-time employees living in Camden was £39,994 in 2021. Camden's median gross annual pay is lower than for Central London (£42,469), but higher compared to Greater London (£37,500) or UK (£31,285). Average pay decreased for Camden residents in 2021 compared to pre-pandemic levels (2019) by 5.7%. This compares with increases seen for Central London (2.1%), Greater London (1.8%) or for the UK (3.0%). Office for National Statistics projections expect Camden's median income to fall across 2022-23.
- 3.147 While Camden's mean annual household income is higher than that of Greater London's average, there is significant disparity between wards within Camden.
- 3.148 Estimated median household income in Camden in 2021 is £35,751. This ranges from £24,759 in St Pancras and Somers Town ward, up to £47,279 in Hampstead Town ward. 19% of Camden households have an annual median income of less than £20,000.

Deprivation

- 3.149 Every part of Camden has areas of relative affluence alongside areas of relative poverty. On the average rank summary measure for local authorities, the Indices of Deprivation 2019 ranks Camden 139th most deprived out of 317 districts in England. The most deprived area in Camden (E01000890 in Gospel Oak ward) is within the 13% most deprived areas in England. By contrast, Frognal and Fitzjohns ward is home to the least deprived Lower Super Output Area (LSOA) in Camden; 4 out of its 8 Lower Super Output Areas (LOSAs) fall within the 10% least deprived LSOAs in England. In 2019-20 37.2% of children in Camden live in low income families (60% below median income). This compares with a London average of 37.8% and 30.4% in England & Wales.
- 3.150 Income and employment deprivation, as measured in the Index of Multiple Deprivation (IMD), are distributed unevenly across Camden. Some wards, such as Highgate, Hampstead Town and Frognal, are much better off, both in terms of

employment and income, while others, such as St Pancras, Kentish Town and Haverstock rank worst on the levels of income and employment deprivation.

Figure 15 – Most and least deprived areas in Camden



Life expectancy

3.151 Life expectancy shows that a boy born in Camden can expect to die 3.7 years before a Camden-born girl, with life expectancy being 83.1 years for a male, and 87.7 years for a female. However, a Camden-born boy can expect to live 3.6 years longer than the national average and a Camden-born girl, 4.6 years longer (ONS life expectancy at birth, 2018 -20). There are health inequalities within Camden by location, gender, deprivation and ethnicity. Men and women from the most deprived areas have a life expectancy of 11.7 years and 10.2 years fewer respectively than those from the least deprived areas (PHE Local Health Profile: Life Expectancy 2015-19).

3.152 Numbers of deaths has been declining in Camden since the 1960s, but have been rising over the last few years. There were 1,307 recorded deaths to Camden residents in 2020, an increase of 15% on 2019, mostly attributable to COVID-19. Camden's Age Standardised Mortality Ratio (ASMR) in 2020 is 697, which is much

lower than London (967) and is 33% lower than the national average (1,040). It is 5th lowest in London. Male and female ASMRs are 866 and 557 respectively (ONS Deaths Summary 2020).

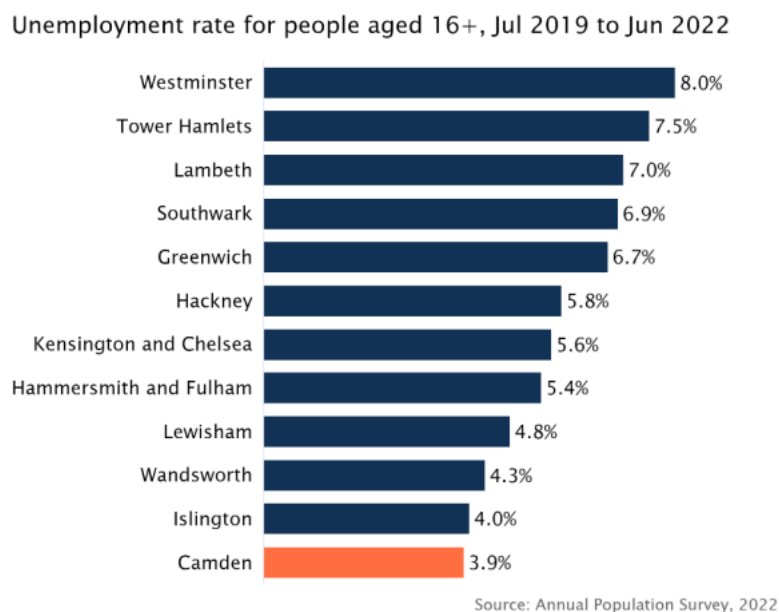
Fuel poverty

3.153 In Camden, an estimated 10% of households were in fuel poverty in 2020, compared to 11% in London and 13% in England. A household is considered to be fuel poor if: (i) it is living in a property with an energy efficiency rating of band D, E, F or G; and (ii) its disposable income would be below the poverty line (60% below median). Electricity prices in the UK rose by 65.4% and gas prices by 128.9% in the 12 months to December 2022. Fuel prices rose by 11.5% in the year to December 2022.

Unemployment²

3.154 Camden has low levels of unemployment (defined as people who are currently not working but are actively searching for work) when compared against other Inner London boroughs, London more broadly and the rest of England. However, among working age adults, only 59% of people with a long-term physical or mental health condition are in employment. Amongst Inner London boroughs, Camden had the lowest unemployment rate between July 2019 and June 2022 of 3.9%. This is just over half the unemployment rate of Westminster, the borough with the highest unemployment rate in Inner London (8%). Between the periods July 2016-July 2019 and July 2019- June 2022, Camden's unemployment rate has fallen by an impressive 1% to 3.9%. This is substantially below the London unemployment rate of 5.3% and marginally below the England rate of 4.3%. Whereas Camden has seen a significant reduction in its unemployment rate, London's unemployment rate has increased across the 2016-2019 to 2019-2022 period and the rest of England where unemployment has remained at 4.3% across the two periods.

² The following information from this section was taken from the 'We Make Camden, State of the Borough Report'

Figure 16 – Unemployment rate for people aged 16+, July 2019 to June 2022

Children in low-income families

3.155 A large proportion of children in Camden are growing up in poverty. Department for Work and Pensions / GLA data shows a stark increase in child poverty within working families between 2014/2015 and 2020/21, indicating that employment provides less protection from poverty than it once did. Within Camden, the share of children in poverty is vastly different across different parts of the borough, with the highest rates of poverty in St. Pancras and Somers Town, both overall and when looking at the proportion within working families. Compared to other places, Camden has the fourth lowest child poverty rates in inner London at 31.9%. This is above the England child poverty rate of 29.3%, and below the London average rate of 35.2%.

Education

School capacity³

3.156 “Over the last 5 years there has been a significant reduction in demand for pupil places within Camden. Forecasts for this year have been drawn up at a time of unprecedented change and challenge for families in Camden. Specifically, the effects of the COVID-19 pandemic have fundamentally altered people’s lives, the

³ The following information from this section was taken from the ‘We Make Camden, State of the Borough Report’

impacts of which are significantly reducing the level of demand for places anticipated within the current forecasts. These factors create a significant degree of uncertainty, and a less stable environment in which to plan ahead. The GLA modelling aims to account for these as best as they can, but rely on assumptions of future trends that can only be accurately assessed over time.

3.157 We consider that it is too early to be definitive about the medium-term impact on school rolls of the new forecast figures, given the hugely disruptive impact of Covid. We will need to consider carefully current admission numbers and next year's school roll projections before we can come to any firm conclusions beyond the difficult action the Council has already taken in removing available school places. The impact on pupil rolls of the recent arrival in Camden of significant numbers of children and young people, including asylum seekers and Afghan nationals, is also not yet known."

3.158 Camden is responsible for around 4,500 children and young people with Special Educational Needs or Disabilities (SEND). The 3,169 children and young people identified as receiving SEND support in state-funded schools represent 14.3% of the pupils on roll at Camden schools.

Educational attainment⁴

3.159 Camden's early years provision has improved remarkably in the six years from 2013 to 2019. In 2013, less than half of children (47%) achieved a good level of early years development. By 2019, the proportion of children achieving a good level of early years development increased to 72% - an increase of 25 percentage points.

3.160 97% of Camden's schools are rated 'Good' or 'Outstanding' by Ofsted and the attainment of children leaving both primary and secondary education is relatively good. 71% of children in Camden at Key Stage 2 (the end of primary education) reach the expected standard in English and Maths, which is higher than the London and England averages. At Key Stage 4 Camden pupils performance improves, 75% reach the expected standard in English and Maths, but closer to the inner and outer London average of 74%. Camden pupils were 6 percentage points better than the rest of England.

3.161 Destinations of children after secondary education in Camden has some distinct variations from both the rest of London and England. Upon leaving Key Stage 4, 68% of Camden's children go to a school sixth form, which is the largest single

⁴ The following information from this section was taken from the 'We Make Camden, State of the Borough Report'

destination. This is 30% higher than the number of people going to school sixth forms in England and 10% higher than the rest of London. As a result of Camden having over two-thirds of children attending school sixth forms, it has notably fewer children attending sixth form colleges and further education colleges when compared to the rest of London and England, only 20% of Camden's pupils go to a Further Education (FE) college, which is nearly half the number that attend FE colleges in England (36%).

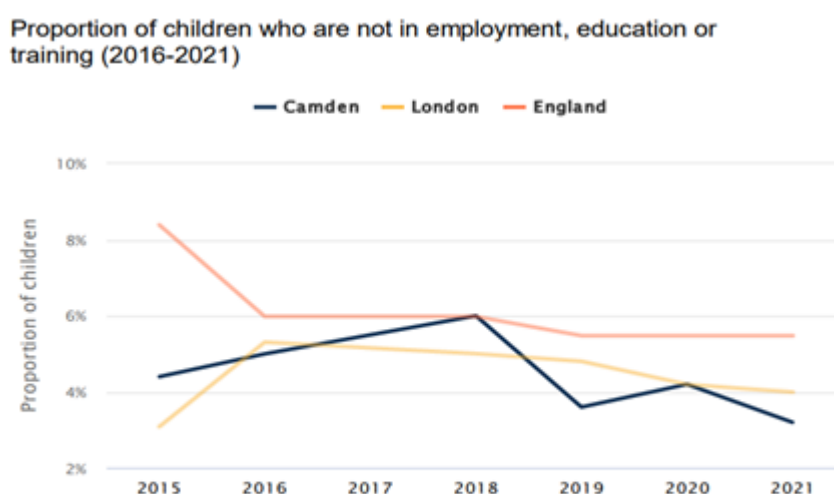
3.162 In the year to December 2021, 79% of the economically active working age population of Camden were qualified to NVQ4 level+ or equivalent, higher than for Central London (76%); Greater London (66%) or England & Wales (49%). The proportion has increased in Camden by 19.3 percentage points since 2008.

3.163 A sizeable proportion (12%) of residents have the lowest level or no qualification and are significantly disadvantaged in the labour market. This compares to 9% in Central London, 11% for Greater London and 16% for GB50.

Number of NEET's (young people not in education, employment, and training)

3.164 As young people transition into adulthood, moving into employment, training or further study is an integral part of navigating that transition. Between 2015 and 2018, Camden saw a rise in the number of 'NEET' children from just over 4% to 6%. Since 2018, Camden has seen the proportion of 'NEET' children halve to around 3% in 2021. Camden now has a lower proportion of 'NEET' children than both London and England.

Figure 17 – Proportion of children who are not in employment, education and training (2016-2021)



Source: NEET and participation: local authority figures 2016–2021, Department for Education
 a. Linear interpolation is used to estimate values for 2017 due to missing data
 b. NEET estimates include individuals whose activity is 'not known'

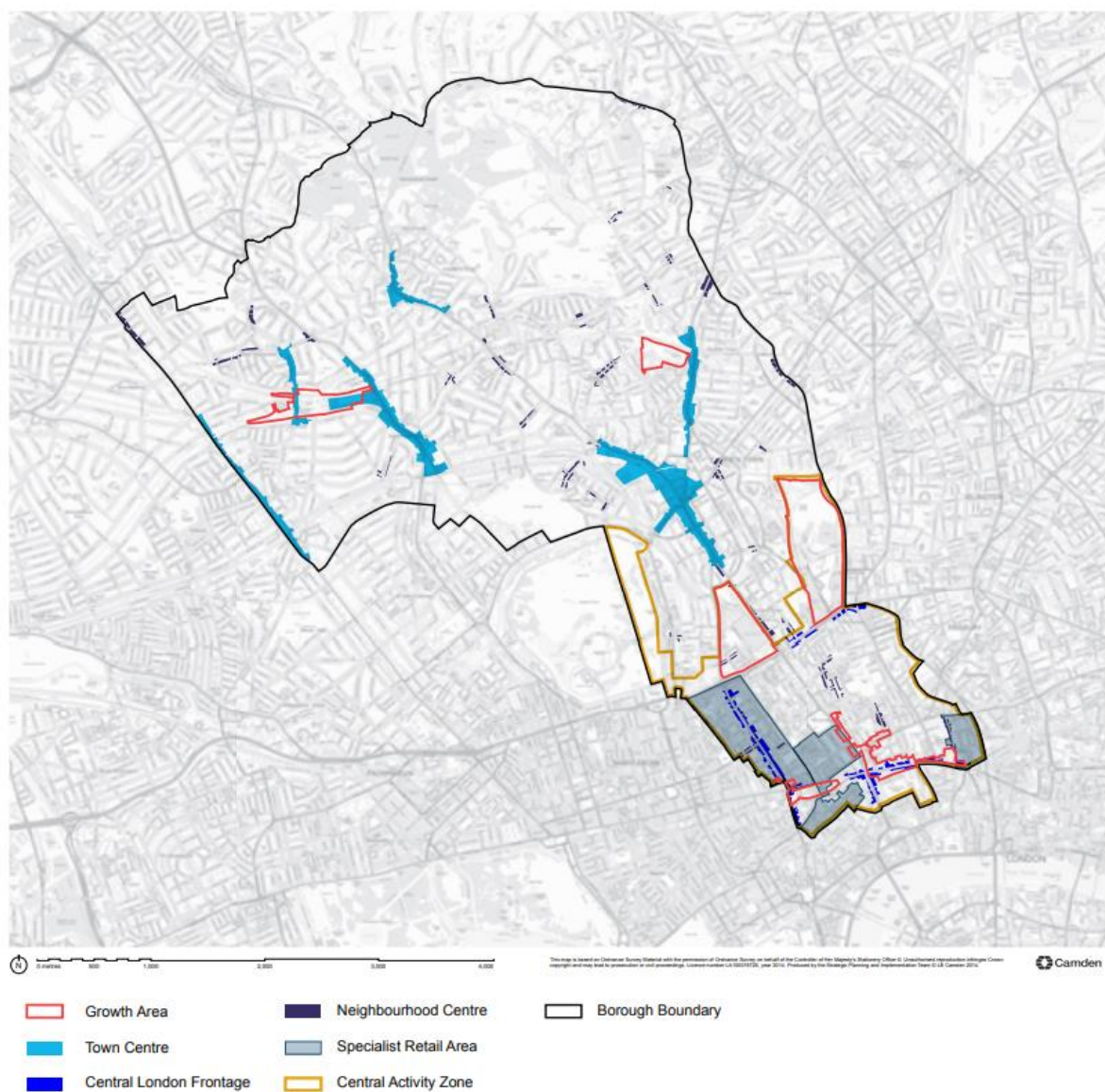
Economic indicators

Designated centres

Table 13– Town Centre designations

Town Centres	Central London Frontages	Specialist Shopping Areas	Growth Areas
Camden Town	High Holborn / Kingsway;	Covent Garden	Euston
Finchley Road / Swiss Cottage	King's Cross;	Fitzrovia and south-west Bloomsbury	Holborn
Hampstead	Tottenham Court Road / Charing Cross Road / New Oxford Street	Hatton Garden	Kentish Town
Kentish Town		Museum Street	King's Cross / St Pancras
Kilburn High Road		Denmark Street	Tottenham Court Road
West Hampstead.			West Hampstead Interchange

3.165 Camden has 37 Neighbourhood Centres, which are identified in supplementary planning document Camden Planning Guidance on town centres and retail.

Figure 18 – Camden's designated centres

Source: Camden Local Plan, 2017

Health of Town Centres and other designated frontages

3.166 The proportion of shops vacant on shopping streets is an important indicator of the health of that centre. The Council's retail surveys have tracked changes in vacancy over time at borough level, although, we do not have vacancy data for 2020 and 2021 due to the pandemic.

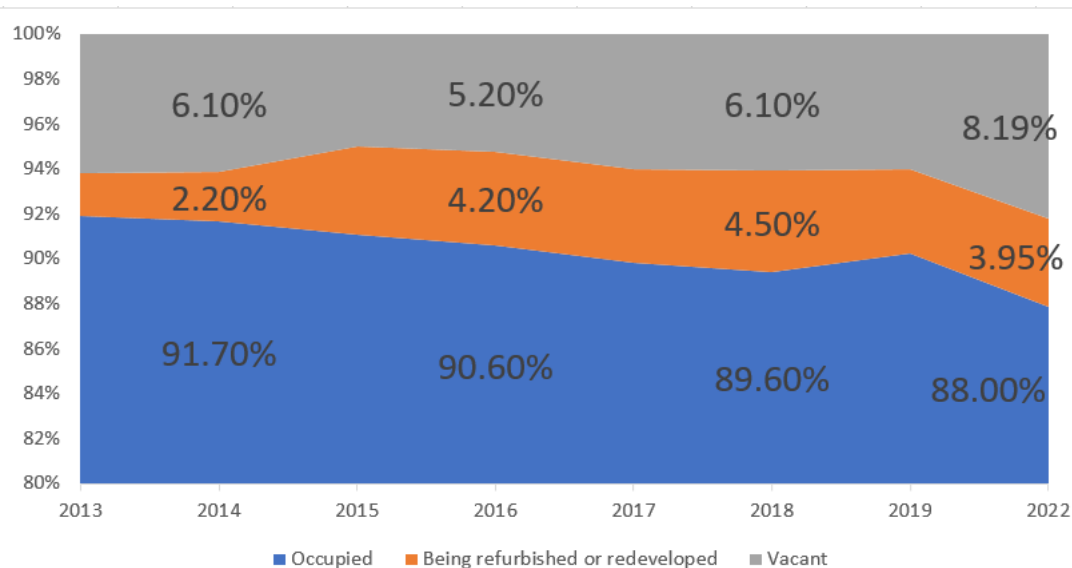
3.167 As shown in the graph below, occupied units in all designated shopping frontages have fallen between 2013 – 2019, from 91.90% to 90.29%.

3.168 Vacancy has fallen slightly between 2013-2019, from 6.20% to 5.98%.

3.169 There has been an increase in units undergoing refurbishment or redevelopment between 2019-2019, from 1.90% to 3.73%.

3.170 Taking into consideration the findings of the Camden Future High Street Prospectus (2020), vacancy rates are likely to have increased since 2019 due to several factors, which are discussed later in this section.

Figure 19 - Vacancy rate, all designated shopping frontages 2013-2022



3.171 Individual Neighbourhood Centres have the highest vacancy rates, with four centres experiencing vacancy rates on or above 25% - Murray Street (25%), Finchley Road – West End Lane (28%), Chalk Farm (35%) and Lismore Circus (50%).

3.172 All the designated Town Centres have vacancy rates below 15%. All the individual Central London Frontages have vacancy rates below 10%. All the individual Specialist Shopping Areas have vacancy rates below 10%, except from Denmark Street which has a vacancy rate of 36%. A full breakdown of each centre's vacancy rates is within the London Borough of Camden's Authority Monitoring Report 2018/19, 2019/20, and 2020/21.

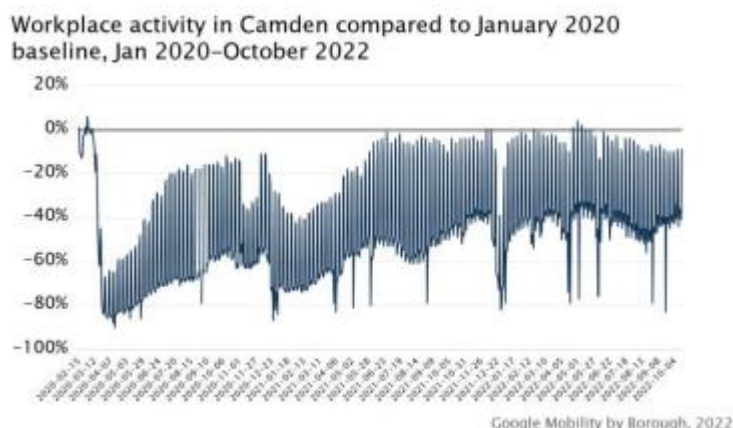
3.173 The Camden Future High Street Prospectus (2020) states that high streets play a crucial role in community life and local economy. However, they have been facing a range of challenges, trends and changing consumer habits which have been compounded by the impact of the COVID-19 pandemic.

3.174 The Prospectus sets out several trends facing Camden's high streets, including:

- evolving consumer economy, caused by less spending in physical stores due to rise of online shopping and experience economy;
- higher business rates and rents are a challenge for businesses;
- high levels of pollution and congestion;
- limited safe space for pedestrians and cyclists, and lack of public space;
- offer not reflecting wider community needs or preferences;
- introduction of permitted development rights by central government which allow the change of use from high street premises without planning permission;
- changes in the way we live. There has been a 22% increase in home working in Camden and more people staying local;
- reduction in footfall in Central London since March 2020; and
- closures resulting in unemployment. There has been a 152% increase in employment in Camden

3.175 We Make Camden: State of the Borough report (March 2023) states that the COVID-19 pandemic and lockdowns had a considerable impact on economic activity in the borough. Traveling to places of work in Camden was significantly reduced during the pandemic, only returning to pre-pandemic level in June 2021, and then exceeding these by April and May 2022. Since this time, workplace activity has been steadily declining through to October 2022. This could be an effect of the cost of living, with more people switching to working from home practices as a cost saving measure.

Figure 20 - Workplace activity in Camden compared to January 2020 baseline, Jan 2020 – October 2022

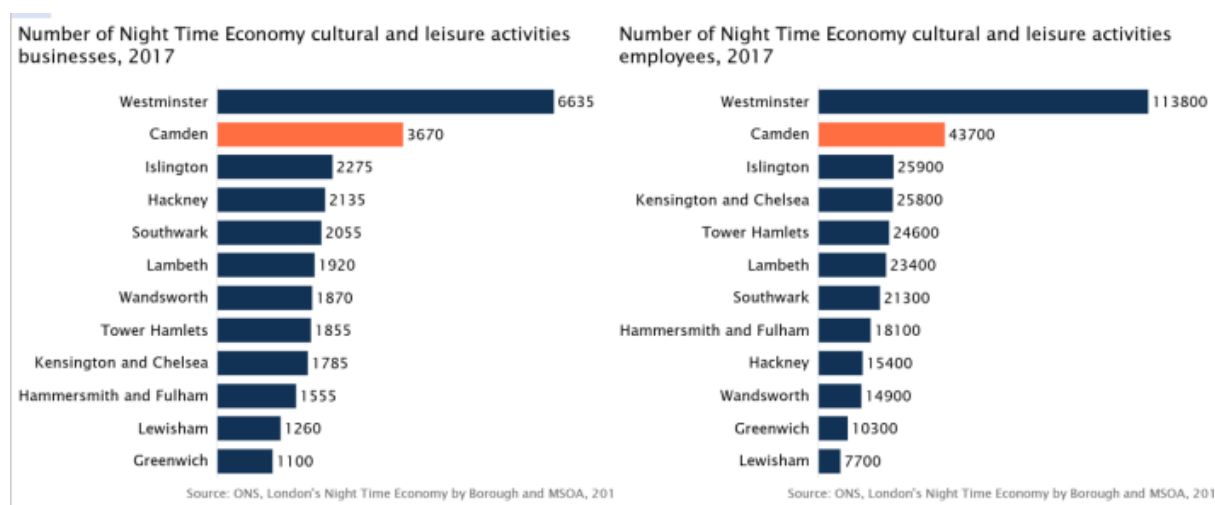


Source: We Make Camden: State of the Borough report (2023)

Food, drink and entertainment uses including the night time economy

- 3.176 We Make Camden: State of the Borough report (March 2023) states that the COVID-19 pandemic and lockdowns had a considerable impact on economic activity in the borough. Traveling to places of work in Camden was significantly reduced during the pandemic, only returning to pre-pandemic level in June 2021, and then exceeding these by April and May 2022. Since this time, workplace activity has been steadily declining through to October 2022. This could be an effect of the cost of living, with more people switching to working from home practices as a cost saving measure.
- 3.177 Camden's image as a dynamic and attractive place is in part due to the number and quality of restaurants, bars, and entertainment venues in the borough. These businesses play an important part in the night time economy of Camden and of London, socially, economically and in terms of job provision. We Make Camden (WMC): State of the Borough report (2023) states that Camden has a strong Evening and Night-Time Economy, second only to Westminster in number of businesses and people employed.
- 3.178 Camden employs 69% more people in the NTE and has 61% more NTE businesses than the next largest borough, reflecting the Council's significant role within the NTE of London.

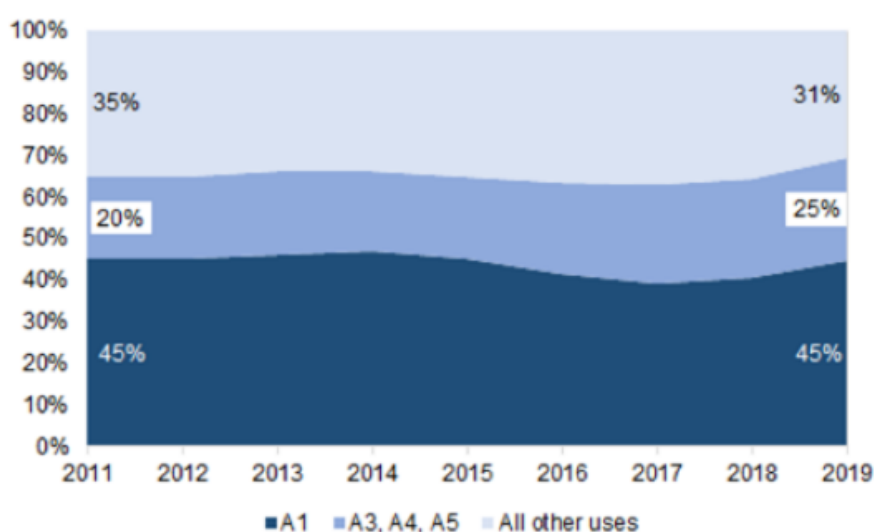
Figure 21 – Night Time Economy businesses and employees in the Borough, 2017



3.179 Night time economy businesses are mostly concentrated within the south of the borough, with 1600, 44% of Camden's total, located in the areas around just three wards (Covent Garden & Holborn, Bloomsbury, and Regent's Park).

3.180 The graph⁵ below shows that retail represents the highest proportion of units within all protected shopping frontages at 45%, followed by all other uses at 31% and then food, drink, and entertainment uses at 25%.

Figure 22 - Retail (A1 shops), food, drink and entertainment (A3, A4, A5), all protected shopping frontages in LB Camden, 2011 to 2019

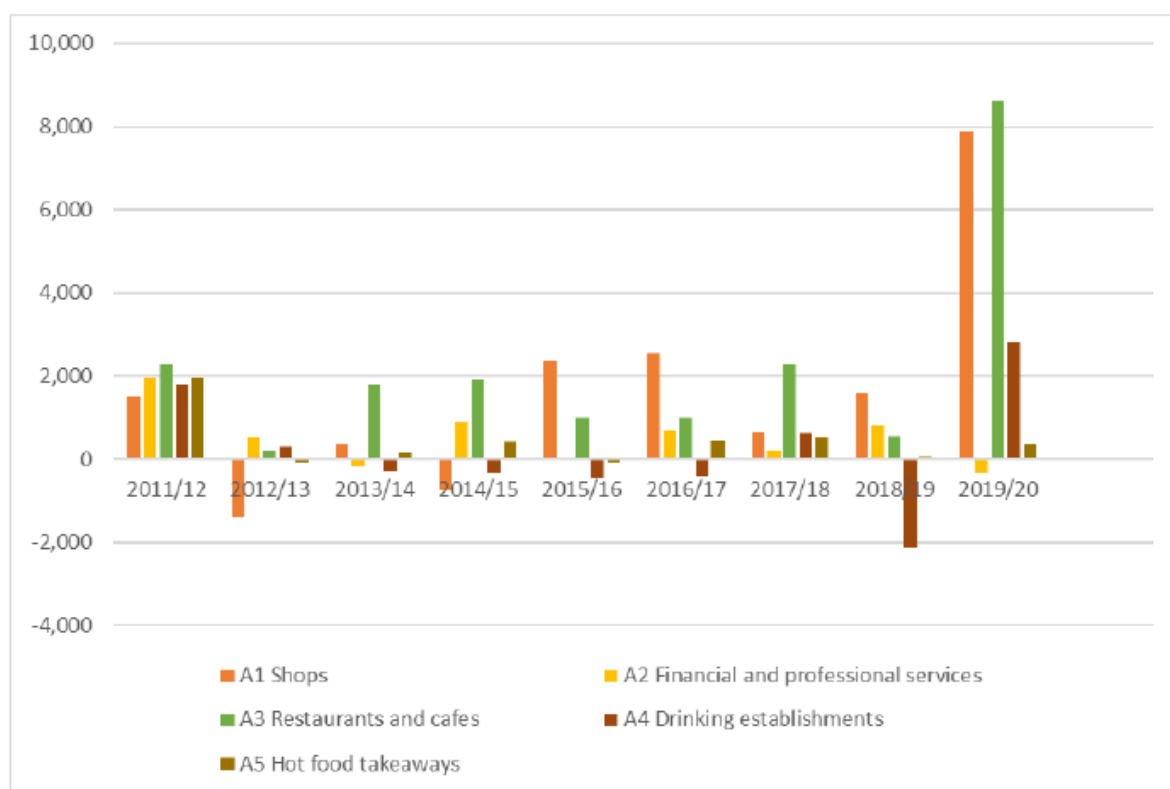


⁵ Camden's annual retail surveys up to and including 2019

Source: London Borough of Camden Authority Monitoring Report 2018/19, 2019/20, and 2020/21

3.181 In 2018/19 and 2019/20 the Council's completions data showed gains in floorspace in most "A" use classes, as set out in the chart below. A small number of major mixed-use schemes have accounted for a high proportion of the overall floorspace completed, notably Hawley Wharf, Camden Town, the Coal Drops Yard development at Kings Cross Central and the refurbishment of Centre Point.

Figure 23 - 'A' uses floorspace completions (net sqm) 2011/12 to 2019/20



Source: London Development Database

Business sectors and employment

Number of registered businesses, and size (employed and output)

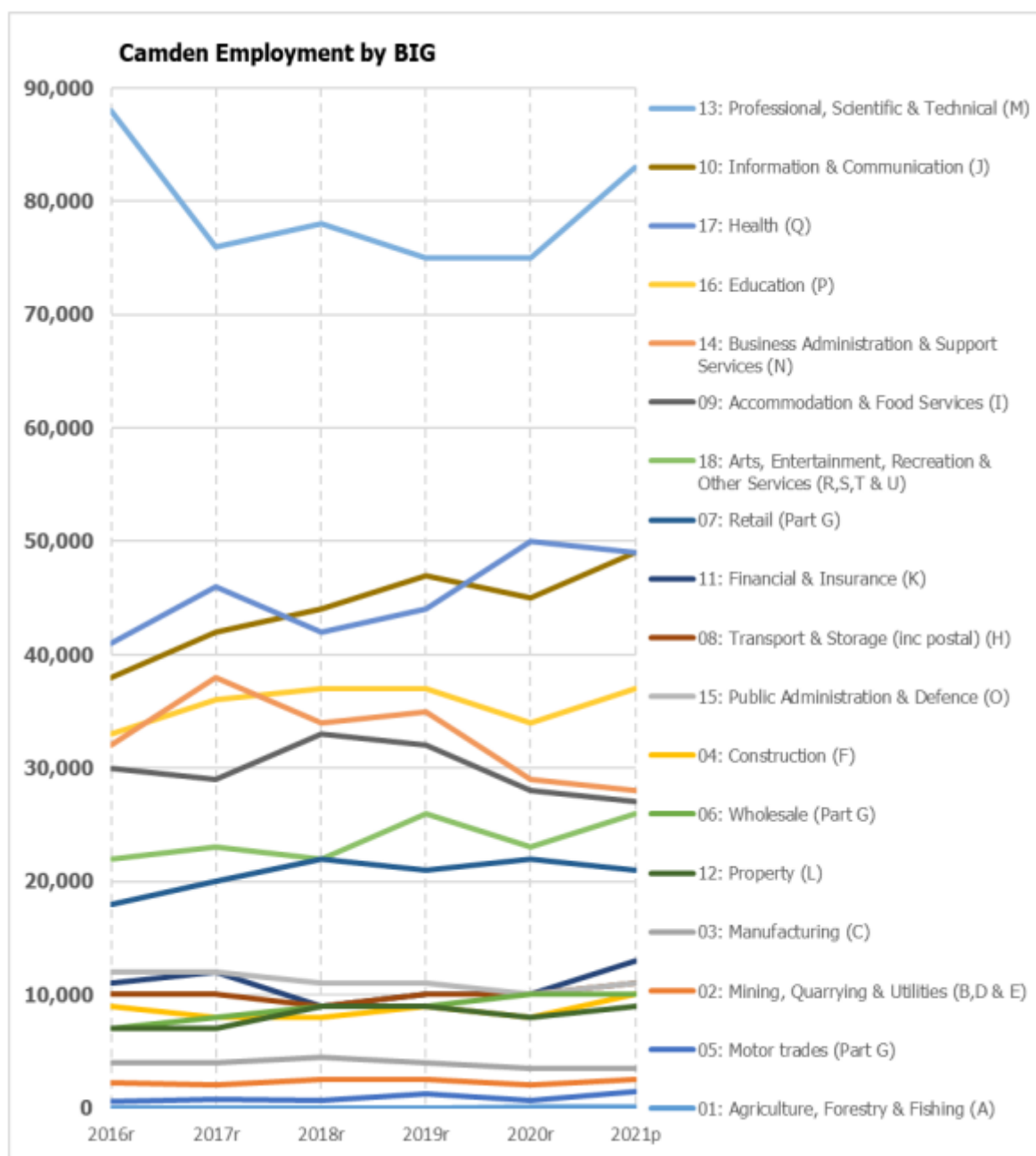
- 3.182 Camden is home to the second highest number of businesses in London after Westminster and is third highest in the UK. There were 38,165 businesses in Camden in March 2022, an increase of 485 (1.3%) on 2021. The total number of businesses has grown 59% since 2010.
- 3.183 Camden currently has the 3rd highest number of businesses in the UK after Westminster and Birmingham. Camden accounts for 6.4% of all London local (business) units.
- 3.184 Most firms in Camden are small with few employees. Of Camden's 38,165 businesses, the vast majority (32,910; 86%) have fewer than 10 employees and three-quarters (28,770; 75%) have fewer than 5. By contrast, there are 185 businesses with 250 or more employees, accounting for less than 0.5% of businesses in Camden.
- 3.185 Camden has the second highest number of business start-ups in London and the second highest number of businesses closures. Of Camden enterprises that started-up in 2016, 41% were still active five years later in 2021. This is better than the survival rates for Central London and Greater London (39%) and the national average (38%). Amongst London boroughs, in 2021, Camden ranked 9th by business survival rate.
- 3.186 Camden has a higher proportion of large businesses by turnover than London or the UK. 11.9% of Camden enterprises had a turnover of £1m or more in 2022, higher than for businesses in London (9.6%) and the UK (9.1%), but lower than Central London (14.4%). Camden ranks 4th in London and 16th overall in the UK.
- 3.187 Camden makes a large contribution to the national economy according to estimates of GVA (Gross Value Added) statistics. The latest estimates for Camden show a GVA of £31.4Bn to the national economy in 2020. This is compared to a peak of £35.1Bn in 2018 and £35.0Bn in 2019.
- 3.188 Camden has seen a 69% increase in GVA compared with 2008, growing faster than Central London (64%), Greater London (50%) or UK (35%). In 2020 Camden was the 4th largest contributor to GVA in London. Camden contributed 6.7% of London's GVA and 1.6% of national (UK) GVA.

Employment

- 3.189 As of 2021, there are 390,000 jobs located in Camden. This is the 3rd highest in London after Westminster and the City.
- 3.190 This number of jobs means that in 2020 Camden had a job density of 2, meaning there are nearly double the number of jobs as residents aged 16-64. This is above both the London and England job density rates, which are around 1 and 0.8 respectively.
- 3.191 Between 2008 and 2021, the number of jobs in Camden has grown by 24.3% – one of the strongest job growth in inner London behind only Tower Hamlets (41.7%) and Hackney (50%).
- 3.192 In fact, since 2008, Camden's job growth has outpaced that of both inner London and London averages. ONS projections suggest that this is likely to continue over the medium and long-term, with job growth in Camden expected to peak and tail-off in line with inner London averages in 2046 and 2051.
- 3.193 In terms of concentration, 59% of jobs are located in the central London portion of Camden, to the south of Euston Road; a quarter of jobs (24%) are concentrated in the central Camden Town/Euston/Regent's Park/Somers Town areas; while the remainder of Camden's jobs (16%) are scattered across town centres and employment sites in north and west Camden, including Hampstead, Kentish Town and Swiss Cottage.

Key sectors

- 3.194 Camden specialises in highly skilled, high value parts of the economy such as law, management consultancy and advertising. The largest industrial sector in Camden is Professional, Scientific & Technical enterprises that make up 27% of enterprises in Camden, compared with 24% for Central London and 19% in Greater London. The sector includes legal, management consultancy, architectural and engineering practices, scientific research and advertising/market research.
- 3.195 The following graph shows total employment change between 2009-2021 by road industry groups. The Professional, Scientific, and Technical sector is the largest sector 83,000 jobs (21% of all jobs), compared with 15% for London as a whole. Employment losses have occurred in Business Administration and Support (-20%), Accommodation and Food services (-16%) and Manufacturing (-13%).

Figure 24 – Camden employment by industry

Supply of employment land

3.196 The total amount of commercial property available in the borough is increasing but the pressure on employment space resulting from high land values, housing need and permitted development remains significant.

3.197 In 2016, Camden had 2,578,000 square metres of commercial and industrial floorspace, up from 2,471,000 square metres in 2012.

3.198 In 2019/20, a total of 112,653 square metres of B1 floorspace (i.e. offices, research and development and light industrial uses) was completed and 76,111 square metres was lost, resulting in a net gain of 36,542 square metres.

3.199 Trends in commercial floorspace vary year by year, with recent years seeing net gains. Although there is forecast growth in employment floorspace from large office developments, the Council remains concerned to ensure that a range of types and sizes of business space is available in the borough, including space that is suitable and affordable for SMEs due to the government's changes to planning uses classes which introduce a new 'Commercial, Business and Service' use class (Class E). Changes between the uses in Class E is not considered to be 'development' and therefore do not require planning permission or any prior approval from the Council. This reduces the Council's ability to protect employment floorspace and manage its supply.

Local training scheme places achieved from completed development

3.200 The Council's Camden Planning Guidance (CPG): 'Employment sites and business premises' (January 2021) explains how the Council will secure employment and training contributions through the planning process. The table provides information on the number of apprenticeship places we have negotiated by year (2020/21 data is not available). Additionally, over £1,680,000 has been secured in 2018/19 and 2019/20 for employment and training initiatives. During this period, around £1,390,000 was secured towards initiatives in the Hatton Garden area.

Table 14 – Apprenticeships secured

Year	Places
2014/15	150
2015/16	168
2016/17	76
2017/18	167
2018/19	136
2019/20	121

Baseline gaps

- 3.201 Some baseline gaps existed for the Local Plan 2016 SA. These indicators have been either altered or removed where appropriate for the updated baseline collection of the Local Plan and Site Allocations. As this is the preliminary stage in the SA process, it is possible that additional sources may be discovered through consultation. Should this be the case, the baseline will be updated accordingly.

Chapter 4: Key Sustainability Issues

- 4.1 Having reviewed the relevant plans and programmes (set out in **Appendix 1**) and analysed the baseline information a number of key sustainability issues facing Camden have been identified. These are shown in **Table 16** below.

Table 15 – Sustainability issues

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
Environmental		
Need to make improvements to active travel	<ul style="list-style-type: none"> • Cycle mode share among residents has remained low. Residents in the north of the borough are further away from the majority of the new high quality cycle infrastructure being delivered. There is therefore a need to push cycle routes further north to ensure that they form part of a comprehensive network and are continuous and connected • Walking is a primary mode of transport for Camden residents – need to ensure walking routes are clutter free, safe, and less polluted. 	Local Plan policy T1 ‘Prioritising walking, cycling, and public transport’ would continue to apply. Promoting active travel benefits health and wellbeing, reduces congestion and air pollution. Further understanding on the local provision for attractive walking routes and cycling facilities could be improved through Site Allocations.
Balancing development pressures, ensuring contextually successful design, and the protection of Camden’s heritage	<ul style="list-style-type: none"> • Camden is an inner London borough with a rich architectural heritage – key issues highlighted in this scoping report mean there are a number of pressures such as Camden’s housing target, supporting a thriving economy, and the climate and ecological emergency. • Given the scale of growth required in the borough and the coverage of heritage designations, design policy needs to respond to this issue by ensuring contextually successful development. 	<p>National planning policy and current Local Plan policy provides protection for designated and non-designated heritage assets.</p> <p>Camden’s declaration of climate and ecological emergency means that another perspective needs to be built into plan policy. Inappropriate development can significantly harm their character and appearance. See Historic England advice on Energy Efficiency and Traditional Homes, and Historic Buildings.</p>

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
Need to reduce carbon dioxide emissions to meet the borough's target	<ul style="list-style-type: none"> Ensuring Camden reaches its 2030 target is a challenge which requires positive action in the built and natural environment 	Current Local Plan policies seek to reduce carbon dioxide emissions however these were drafted at a time when advances in moving towards zero carbon were halted. It is important the borough continues to push measures – by improvements to existing stock and continued reductions in new developments to meet borough targets.
Adaptation to a changing climate	<ul style="list-style-type: none"> Heatwaves and flood events reoccurring is likely to increase as a result of climate change – our buildings and natural environment should be designed to adapt 	A greater focus is needed to ensure existing and new environments are able to adapt to climate change, without this understanding we will increase vulnerability.
Limited scope for creating new open space	<ul style="list-style-type: none"> The majority of new development in the borough occurs on previously developed land and the fact that there is a significant shortage of available land for development and therefore limited scope for creating new open space. 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. (Open Spaces Needs Assessment Report, 2014) 	<p>Current Local Plan policy A2 'Open space' seeks to secure new and enhanced open space and ensure development does not place unacceptable pressure on the borough's existing network. This policy would continue to apply in the absence of a new Local Plan.</p> <p>It is important that the Council continues to address areas deficient in open space, and access to nature particularly those areas</p>

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
		which are home to greater deprivation, and communities that would benefit from direct access to open space and nature.
Poor air quality	<ul style="list-style-type: none"> Camden has some of the poorest air quality in Europe, especially in the south of the borough where traffic congestion is severe. Since 2000, the whole borough is designated an Air Quality Management Area. Air pollution does not affect everyone equally. Less affluent neighbourhoods and Black, Asian and minority ethnic communities typically experience worse health outcomes as a result of air pollution exposure. (Camden Clean Air Action Plan 2023 – 2026) The burning of natural gas for heating in domestic and commercial buildings accounts for 42% of NO₂ emissions and 12% of PM_{2.5} emissions in Camden and is also a major contributor to carbon dioxide emissions in the borough. Road transport accounts for almost half of NO₂ emissions and a quarter of PM_{2.5} emissions in Camden, as well as 14% of CO₂. Economic growth is a continuous driver for freight movement in and around London. Most delivery vehicles use diesel fuel and travel significant distances. These transport movements have a disproportionate impact on air 	<p>Current Local Plan policy CC4 'Air quality' seeks to ensure that the impact of development on air quality is mitigated and exposure to poor air quality is reduced. Whilst this policy seeks to ensure no harm, the health impacts of current poor air quality are not addressed, it also does not strive for higher targets.</p> <p>A review of current policy could help towards the ambitions set out in the boroughs Clean Air Action Plan.</p>

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
	<p>quality in Camden.</p> <ul style="list-style-type: none"> Construction activity involves the use of large machines, often powered with diesel engines, as well as processes which can cause dust to become airborne (for example from building demolition). Construction therefore has a significant impact on local air quality and potentially public health if it is not carefully managed. Construction activity is responsible for 4% of NO₂ emissions, 24% of PM₁₀ emissions and 9% of PM_{2.5} emissions in Camden. 	
Potential contamination on previously developed land	<ul style="list-style-type: none"> While no sites in the borough are currently designated as contaminated for the purposes of the Environment Act 1990 Part II A, numerous sites in the borough have 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>Environmental Health, Camden</i>) National Planning Policy Framework (NPPF) paragraphs 174 and 183, require policies to contribute and enhance the natural and local environment and take full account of ground conditions and potential risks from contamination. (see also the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management (LCRM)) 	<p>Current Local Plan policy A1 'Managing the impact of development' seeks to ensure that development sites that are known to be contaminated, have the potential to be contaminated, or are located in close proximity to such sites to submit relevant assessments and take appropriate remedial action.</p> <p>This policy would continue to apply in the absence of a new Local Plan.</p>

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
Risk of surface water and groundwater flooding in parts of the borough	<ul style="list-style-type: none"> Although there are no areas at risk of flooding from rivers or the sea the borough has experienced significant surface water flood events in 1975, 2002, and 2021. The proportion of developed land (impermeable surfaces) in Camden increases surface water flooding risks, so its important that development considers appropriate measures of drainage. There are 12 Local Flood Risk Zones in Camden. They do not exceed national criteria for flood risk but can still affect homes, businesses, and infrastructure. (Camden SFRA 2014). Historic watercourses and previously flooded streets (Map 6 Camden Local Plan). Sewer surcharge - some of the older main sewer network in London, operated by Thames Water, falls below the 3.33% AEP design standard, with implications for those areas There is a small risk of groundwater flooding in Camden, which takes two principal forms. <ul style="list-style-type: none"> Most common is 'perched' groundwater. The risk of this type of flooding is difficult to model but has been recorded in parts of the borough, notably Kilburn, Fortune Green and West Hampstead, Aquifer based groundwater flooding is rare in Camden, but it is possible in areas around Hampstead Heath and 	Local Plan policy for areas at risk of flooding should be updated in line with the recommendations of updated Strategic Flood Risk Assessment and consultation with the Environment Agency. National Planning policy for assessment of flood risk has changed and policy may need to be updated to reflect this.

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
	in the very south of the borough.	
Water supply and use	<ul style="list-style-type: none"> Camden is within Thames Water's London Water Resource Zone which is classified as 'seriously water stressed.' This means there is a high population with high water demands and limited water availability. (Environment Agency) 	<p>Current Local Plan policy CC3 'Water and flooding' seek to ensure development incorporates water efficiency measures - Residential developments are expected to meet the requirement of 110 litres per person per day (including 5 litres for external water use).</p> <p>Water efficiency requirements are restricted to new residential developments – opportunity to explore whether this could be broadened to other types of development.</p>
Water quality and environmental impact	<ul style="list-style-type: none"> Camden has groundwater source protection zones I & II. Special Protection Zones have been produced to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. It is for this reason that certain development types may be deemed unacceptable where they pose a risk of contamination to groundwater. High polluting activities, such as petrol stations or cemeteries should be directed away from SPZ1. Further guidance can be found on our website at 	Current Local Plan policy CC3 'Water and flooding' requires development to avoid harm to the water environment. This policy would continue to apply in the absence of a new Local Plan.

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
	<p>https://www.gov.uk/government/publications/groundwater-source-protection-zones Potential site allocations in SPZ should follow guidance and advice from Environment Agency.</p> <ul style="list-style-type: none"> • The Upper Chalk aquifer should be taken in full consideration where developments where deep piled foundations are proposed. Should foundations works penetrate through the London Clay to the Chalk then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised. • The Grand Union canal has moderate status which is a change from good in 2009 (following further investigation) and the Regents canal remains at moderate status due to mitigation measures not yet in place which would make the watercourse more natural. (Please see Water Framework Directive and Thames River Basin Management Plan) (Environment Agency) 	
Protection and enhancement of biodiversity	<ul style="list-style-type: none"> • Camden has 38 areas designated as Sites of Importance for Nature Conservation (SINC), covering almost 414 hectares. Some of these are managed by the Council, the rest owned by various organisations, most notably the City of London Corporation, the Royal Parks and Network Rail. These SINC's form the core of Camden's wildlife network 	Current Local Plan policy A3 'Biodiversity' states that the Council will protect and enhance sites of nature conservation and biodiversity. This policy would continue to apply in the absence of a new Local Plan.

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
	<p>and their protection, enhancement and connectivity to surrounding habitat is a priority.</p> <ul style="list-style-type: none"> Green Infrastructure delivers biodiversity benefits and climate change adaptation. Open spaces can serve as flood storage areas if they are located in areas of high risk of flooding. Green spaces and buffer zones can provide amenity benefits, biological enhancements, sustainable drainage and reduction in surface/storm water flooding. Green roofs can also be a valuable amenity space. The protection and enhancement of biodiversity is considered as a key sustainability issue. 	<p>There is an opportunity for the Site Allocations to focus on building buffer zones.</p>
<p>Low household recycling rates. Targets not achieved for construction and demolition waste.</p>	<ul style="list-style-type: none"> Camden Annual Monitoring Report - The figures show that recycling of household waste is struggling to push above 30%, not meeting the 50% target. Measures required to increase the proportion of construction and demolition waste which is reused/ recycled/ recovered 	<p>Review of current Local Plan policy on household waste, design and servicing could help towards meeting the boroughs target for recycling.</p> <p>A review of Local Plan policy could support reporting of construction and demolition waste and help identify measures to increase reuse.</p>
Social		
<p>Providing suitable housing</p>	<ul style="list-style-type: none"> The London Plan sets Camden a ten-year minimum housing target of 10,380 homes over the period 	<p>Current Local Plan policies for meeting housing needs address these issues and</p>

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
for a growing population	<p>2019/20 – 2028/29 (an average of 1038 homes per year). The number of new homes delivered in Camden has varied a lot over the last ten years, however since 2017 the number of new homes being approved has fallen below the number of new homes needed to meet our housing target.</p> <ul style="list-style-type: none"> • The London Plan states “While London is a ‘young city’, it is expected to experience substantial growth in its older population. By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent. Appropriate accommodation is needed to meet the needs of older Londoners” • Living in safe and decent housing is an essential aspect of a good life. Good housing provides basic needs such as shelter, warmth, safety and privacy. Adequate and affordable housing is a basic need that everyone in Camden should have. The Local Plan has a key role to play in delivering this ambition, in addition to seeking a range of housing types, sizes, accessibility and affordability, that meet the needs of different groups, including families, to tackle inequality and overcrowding, create sustainable and resilient neighbourhoods, improve health and wellbeing and secure a supply of housing suitable for individuals and 	would continue to apply in the absence of a new Local Plan.

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
	families on low and middle incomes.	
The affordability of housing and the supply of affordable housing in Camden	<ul style="list-style-type: none"> Camden is one of the least affordable places to live in the country and there are 6,753 households on the housing register. House prices in Camden are amongst the highest in the UK, making housing affordability very low. Prices in the rental market are significantly higher in Camden compared to London and England, for both private and social housing (making up 61% of Camden households). A median house price is currently 22 times higher than median wage, up from 14 times higher in 2008. 	Current Local Plan policies for meeting housing needs address these issues and would continue to apply in the absence of a new Local Plan.
Wide disparities between deprived and affluent areas in the borough	<ul style="list-style-type: none"> There are wide disparities of deprivation and affluence within Camden wards. The Indices of Deprivation 2019 ranks Camden 139th most deprived out of 317 districts in England. The most deprived area in Camden (E01000890 in Gospel Oak ward) is within the 13% most deprived areas in England. By contrast, Frognal and Fitzjohns ward is home to the least deprived Lower Super Output Area (LSOA) in Camden; 4 out of its 8 Lower Super Output Areas (LOSAs) fall within the 10% least deprived LSOAs in England. In 2019-20 37.2% of children in Camden live in low income families (60% below 	The current Local Plan policy G1 'Delivery and location of growth' states the Council will create conditions for growth, to meeting identified needs and harness the benefits for those who live and work in the borough. This policy would continue to apply without a new Local Plan – however a greater place based approach could help identify where and what interventions could help to reduce inequalities.

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
	<p>median income).</p> <ul style="list-style-type: none"> • In Camden, high levels of crime deprivation are concentrated mostly in the borough more densely populated areas: Camden Town, Primrose Hill, Kilburn, King's Cross and Somers Town. • Cost of energy means that the proportion of households in fuel poverty are further impacted • A large proportion of children in Camden are growing up in poverty 	
Large health inequalities within Camden	<ul style="list-style-type: none"> • Air pollution causes health difficulties and avoidable deaths. Two thirds of children being admitted to hospital due to asthma are living in the two most deprived quintiles of Camden, while the least deprived quintiles account for only 15% of admissions. • There are large inequalities in the pre-75 mortality rate from causes considered preventable in Camden. Somers Town has the highest number of preventable death in Camden with 180 per 100,000. The Medium Super Output Areas with the lowest number of preventable deaths – of 40 deaths per 100,000 or lower, are located in some of Camden's most affluent areas, namely South Hampstead, Hampstead Town and Frognal. 	<p>Air pollution (see above).</p> <p>The current Local Plan sought to ensure health and wellbeing was a key consideration. Policy C1 'Health and wellbeing' sought to bring all these themes together to reduce health and wellbeing inequalities. This policy would continue to apply in the absence of a new Local Plan.</p>

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
	<ul style="list-style-type: none"> Self-reported loneliness in Camden is substantially higher than in any other inner London borough 	
Economic		
Vacancy rates in Camden's centres are increasing	<ul style="list-style-type: none"> Vacancy rates in all designated shopping frontages improved between 2013 to 2019, from 6.20% to 5.98%. Vacancy rates however have increased to 8.19% since 2019 due to the impact of the pandemic, rise of online shopping and increase in home working, amongst other factors. (Camden Retail Survey). Neighbourhood centres generally have the highest vacancy rates. Activity within retail and recreational business remains around 20% below pre-pandemic levels. The Government's changes to permitted development rights have reduced the Council's ability to influence planning and development within centres, including policies for managing the mix of uses in centres and frontages. 	<p>The current Local Plan set policies for the quantity and location of retail development in Policy TC1, policies for Camden's centres and other shopping areas in Policy TC2 and policies for shops outside of centres in Policy TC3. These policies would continue to apply in the absence of a new Local Plan, and the trend of increasing vacancy rates and lower retail and recreational activity would continue.</p> <p>The policies in the current Local Plan will have limited effect considering the changes to permitted development rights which have occurred since its adoption.</p>
Improving skills and qualifications	<ul style="list-style-type: none"> Camden's residents are highly qualified and well educated, compared to London and England. A sizeable proportion however (12%) of residents have the lowest level or no qualification and are significantly disadvantaged in the labour market Only 20% of Camden's pupils go to a Further Education (FE) college, which is nearly half the number that attend FE 	<p>Trends in educational attainment and enrolment in higher education are likely to continue in the absence of a new Local Plan.</p> <p>A new Local Plan would provide an opportunity of bringing the number of pupils attending FE colleges closer to the national</p>

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
	<p>colleges in England (36%)</p> <ul style="list-style-type: none"> Camden has a lower proportion of 'NEET' children than both London and England, but efforts are required to maintain lower 'NEET' children. 	<p>average, and maintaining a lower proportion of 'NEET' children.</p>
Ensure range of provision for employment clusters to accommodate need	<ul style="list-style-type: none"> The number of jobs in Camden grew by 24.3% from 2008 to 2021 and is expected to continue growing in the future. Camden specialises in highly skilled, high value parts of the economy such as law, management consultancy and advertising. The largest industrial sector in Camden is Professional, Scientific & Technical enterprises. The Professional, Scientific, and Technical sector is the largest sector 83,000 jobs (21% of all jobs), compared with 15% for London as a whole. Employment losses have occurred in Business Administration and Support (-20%), Accommodation and Food services (-16%) and Manufacturing (-13%). Jobs in the night time economy - Camden has a strong Night-time Economy, both in terms of jobs and number of businesses, mostly concentrated in the South of the borough. 	<p>In the absence of a new Local Plan, existing policies on employment and jobs will remain valid in the adopted 2017 Local Plan (e.g. policies E1 – E3 and TC4 on town centre uses), which will maintain the range of provision for employment clusters and strong night time economy.</p> <p>The upward trend in number of jobs will continue, further increasing the job density of the borough, without effective policies to address this.</p>
Balancing the demand for housing with the protection of employment	<ul style="list-style-type: none"> The total amount of commercial property available in the borough is increasing but the pressure on employment space resulting from high land values, housing need and permitted development remains significant. 	<p>Pressures on employment space will be likely to continue, although policies in the adopted 2017 Local Plan (e.g. Policy E2) may have an ongoing positive effect on improving the provision of employment and</p>

Sustainability Issue	Summary of issue	Likely evolution of the issue without the review of the Local Plan
land		commercial premises and protecting existing premises and sites, as this policy will still be valid in the absence of a new Local Plan.

Chapter 5 - The SA framework

- 5.1 The SA appraises the likely significant effects of the policies and site allocations in the Local Plan in relation to whether they will help to meet a set of sustainability objectives – the SA Framework.
- 5.2 The SA objectives set out in **Table 17** have been developed from the previous SA objectives used during the sustainability appraisal of the 2017 Camden Local Plan and draft Site Allocations Local Plan (2020) and updated to take into account changes in the key sustainability issues facing the borough and updates to the international, national, sub-regional and local policy objectives that provide the context for the Plan.

Table 16 - Sustainability Appraisal objectives and criteria

Ref.	Draft SA objective	Sub-criteria Will the Local Plan...	SEA Topic
Social			
1	To promote the provision of a range of high quality and affordable housing to meet local needs	a) Provide adequate housing completions to meet local needs b) Protect and promote affordable housing development c) Provide housing for people, particularly families, on moderate and lower incomes? d) Encourage development at an appropriate density, standard, size and mix? e) Provide everybody with the opportunity to live in a better home?	Population, Material assets,
2	To promote a healthy community	a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles? b) Provide opportunities and infrastructure that make the use	Population, Human health,

Ref.	Draft SA objective	Sub-criteria Will the Local Plan...	SEA Topic
		<p>of walking, cycling, and recreation facilities more attractive?</p> <p>c) Support improvements to existing homes (healthy living environment)</p> <p>d) Support health providers and commissioners to fulfil their strategic estates plans?</p> <p>e) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?</p>	
3	To tackle poverty and social exclusion and promote equal opportunities	<p>a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?</p> <p>b) Provide for equality of access for all to buildings and services (social value)?</p> <p>c) Address areas deficient in access to open space and nature, particularly areas which have greater deprivation, and communities that would benefit from direct access</p> <p>d) Encourage development opportunities in those areas in need of economic development?</p>	Human health, Population
4	To improve amenity by minimising the impacts associated with development	<p>a) Ensure that the amenity of neighbours is not unduly impacted?</p> <p>b) Ensure that development and operations will not affect noise sensitive uses?</p>	Human health
Environmental			
5	To conserve	a) Help to protect,	Biodiversity,

Ref.	Draft SA objective	Sub-criteria Will the Local Plan...	SEA Topic
	and improve open space provision	increase/improve open space?	flora and fauna, Human Health, Landscape
6	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan? b) Provide for the protection of biodiversity and open space in the borough? c) Prevent habitat fragmentation, loss of wildlife refuge areas, and increase connectivity? d) Provide for new re-naturalised areas? e) Protect and provide for the protection and planting of more trees in the borough?	Biodiversity, flora and fauna, Human health
7	To improve local air quality and limit exposure	a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage more trips by walking and cycling?	Human health, Air
8	To promote the efficient use of energy, water and other natural resources, throughout the life of the development	a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources?	Climatic factors, Soil, Human health

Ref.	Draft SA objective	Sub-criteria Will the Local Plan...	SEA Topic
		<ul style="list-style-type: none"> d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction? 	
9	To protect and manage water resources (including groundwater)	<ul style="list-style-type: none"> a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Promote the protection and enhancement of the quality of Camden's waterways? d) Protect groundwater source protection zones? (manage risks to groundwater resources associated with deep piled foundations) 	Water, Biodiversity, flora and fauna, Soil, Population
10	To ensure our buildings and environment can adapt to a changing climate	<ul style="list-style-type: none"> a) Take into account potential flood risk? b) Ensure locations identified for growth and infrastructure are located away from areas of high flood risk c) Reduce flood risk? d) Ensure buildings are designed to adapt to warmer summers and increased flood events? e) Provide planting / greening that is more resilient to the changing climate 	Climatic factors, Water, Biodiversity, flora and fauna, Soil, Population

Ref.	Draft SA objective	Sub-criteria Will the Local Plan...	SEA Topic
11	To promote high quality and sustainable urban design	a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Ensure enhancement of the public realm and local distinctiveness? c) Encourage the use of sustainable design and construction methods?	Cultural heritage, Climatic factors
12	To protect and enhance the historic environment	a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value? b) Help ensure new development maintains local character and respects existing high quality townscape? c) Encourage heritage-led regeneration? d) Help provide solutions to those assets on the Heritage at Risk register?	Cultural heritage
Economic			
13	To ensure new development makes efficient use of land, buildings and infrastructure	a) Encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?	Material assets, Soil,
14	To encourage and accommodate sustainable	a) Encourage the retention and growth of existing, locally based industries? b) Accommodate new and	Material assets, Population

Ref.	Draft SA objective	Sub-criteria Will the Local Plan...	SEA Topic
	economic growth and employment opportunities	expanding businesses? c) Encourage new investment in the local economy and promote development opportunities for employment? d) Ensure the job density is reduced?	
15	To ensure our designated centres remain sustainable and adaptable for the future	a) Encourage occupation of units and reduce vacancy rates? b) Consider changing trends and patterns in how people use the designated centres?	Material assets, Population

Chapter 6: Consultation on the SA Scoping Report and Next Steps

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

- The Environment Agency
- Natural England
- Historic England

6.2 We have obtained the views of these agencies and have incorporated their comments into this report and the SA Framework.

6.3 Historic England consider that the SA should set out indicators to enable understanding over the plan period the effects on the historic environment, such as:

- The number and condition of heritage assets on the Heritage at Risk register;
- The proportion of conservation areas with up to date appraisals and/or management plans.

The SA report will include a section on monitoring.

1.5 The emerging draft objectives of the new Camden Local Plan (incorporating site allocations) will be tested against the SA objectives set out in this Scoping Report.

This will allow an assessment of the relationship between the Local Plan and sustainability objectives, in order to highlight any issues or inconsistencies.

Following this, an appraisal of emerging options for the new Local Plan will be carried out. The draft SA Report will then be produced, which will include an assessment of the options appraised. This will then be subject to public consultation. The Final SA Report will be published alongside the (pre-submission) version of the Local Plan.