



Strategic Environmental Assessment (SEA) of the Kentish Town Neighbourhood Plan



Environmental Report (Update)
Non-technical Summary
November 2015

REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Nov 2015	Non-technical Summary of the Environmental Report Update published alongside the 'Submission Draft' Kentish Town Neighbourhood Plan	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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Introduction

AECOM is commissioned to undertake Strategic Environmental Assessment (SEA) in support of the emerging Kentish Town Neighbourhood Plan. The plan is being prepared by the Kentish Town Neighbourhood Forum (KTNF).

The NDP, once adopted, will present planning policy and guidance for the neighbourhood area. Alongside the London Plan and the Camden Local Plan it will provide a framework for determining planning applications up to 2030.

SEA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives.

This is the **non-technical summary (NTS)** of the SEA Report (known as the 'Environmental Report') Update being published alongside the 'submission draft' version of the plan.

Structure of the Environmental Report Update / this NTS

The Environmental Report Update (and this NTS) sets out to answer four questions:

1. What's the scope (i.e. parameters) of the SEA?
2. What has plan-making / SEA involved up to this point?
 - In particular, how has assessment of 'reasonable alternatives' fed-in?
3. What are the assessment findings and recommendations at this current stage?
 - i.e. what would be the effect of the draft plan as published, were it to be implemented?
4. What are the next steps?

What's the Scope of the SEA?

An important first step in the SEA process involves establishing the 'scope', i.e. those sustainability issues and objectives which should be a focus of the SEA, and those that should not. The following is a brief summary of some of the sustainability issues discussed within the Environmental Report (as falling within the scope of SEA). It is important to emphasise that the following list is not comprehensive.

Environmental issues

- Public Transport Accessibility Levels (PTAL) are very high, with scores of 6a to 6b (the highest levels obtainable). However, there are some identified issues, including in relation to disabled access.
- Despite high PTAL, traffic congestion is evident along the Kentish Town, which results in poor air quality.
- In terms of the townscape, the Kentish Town Road forms the spine of the town centre. The area around Kentish Town Station and the road bridge at the northern end of the high street is viewed by many to be the 'gateway' to the area.
 - The space has an identity that is recognised by residents and people passing through. This is partly because of its sense of openness which interrupts the street elevations and allows views to Parliament Hill / Hampstead Heath. However, the design of the public space does not respond to the 'gateway' importance of the place. Problems include narrow pavements, lack of space and poorly planned junctions, particularly with Regis Road. Pedestrian crossings do not allow for natural desire lines and there is no provision of cycle routes. Also, poorly designed frontages nearby negatively impact on the visual amenity and sense of the area.
- There are four conservation areas within the plan area, namely the Bartholomew Estate Conservation Area, Inkerman Conservation Area, Kelly Street Conservation Area, and the Kentish Town Conservation Area. A small section of the Dartmouth Park Conservation Area bisects the northern edge of the plan area, while the southern boundary of the plan area is shared with Jeffrey's Street Conservation Area and Rochester Conservation Area.
- In terms of nature conservation / biodiversity, interest is focused on the railway embankments that run through the plan area. Much of this land is designated as a 'green corridor' of borough-wide importance.

Socio-economic issues¹

- Camden ranks 15th out of 32 London Boroughs in terms of the Index of Multiple Deprivation (IMD), and levels of deprivation in Kentish Town ward are fairly typical of Camden. Notable relative deprivation is associated with neighbouring Cantelowes ward (part of which is within the plan area).
- 73% of Kentish Town ward residents are economically active, which is significantly higher than Camden (68%), London (72%) and national (70%) averages; and consequently the ward has lower levels of unemployment and residents whom are economically inactive due to retirement, education, caring for family or long term illness. 68% of Cantelowes ward residents are economically active.
- A 2013 'health check' found that Kentish Town Centre is performing well in relation to the provision of convenience and service units, but there is limited comparison goods retail floorspace. However, the centre has experienced a steady increase in the number of vacant units, and the current proportion is above the Camden average. There are also issues associated with the quality of retailers; and smaller commercial floorplates within the town centre act to deter key retailers.
- Monitoring data for Camden suggests land use pressures and conflicts between uses, with it particularly being the case that demand for housing land conflicts with employment uses. There has been significant loss of office space within Kentish Town and across Camden; and there are concerns regarding the loss light industrial / warehousing space at the sub-regional and regional (i.e. London) scale.

The SEA 'framework'

Drawing on the review of sustainability issues, a concise list of sustainability objectives was established under ten 'topic' headings. Taken together, this list comprises the methodological 'framework' for the SEA.

Sustainability topics and objectives (the 'SEA framework')

Topic	Objectives
Air quality and noise	<ol style="list-style-type: none"> 1. Contribute to an improvement of air quality 2. Ensure that noise from existing and new developments and operations will not affect noise sensitive land uses 3. Ensure noise sensitive uses are not located near established noise generating uses
Biodiversity	<ol style="list-style-type: none"> 4. Protect and enhance existing habitats and biodiversity and seek enhancements. 5. Protect and enhance natural habitats in the area, particularly those associated with priority species 6. Deliver targeted habitat creation, including through the provision of open space and green roofs. 7. Protect and provide for the planting of more trees
Climate change mitigation (non-transport)	<ol style="list-style-type: none"> 8. Promote designs that facilitate efficient use of energy and support the generation and use of renewable and low carbon energy 9. Reduce the amount of waste requiring final disposal, including waste associated with the development process
Community and well-being	<ol style="list-style-type: none"> 10. Promote healthy living through e.g. provision of cycling and recreation facilities 11. Help reduce levels of crime and fear of crime 12. Ensure access to local shopping, community, and leisure facilities and access to quality open space including children's play space 13. Tackle poverty and social exclusion; and 14. Encourage development that facilitates social cohesion 15. Encourage development opportunities in those areas in need of stimulation 16. Promote access to employment opportunities for local people 17. Protect existing and provide for new education facilities to meet needs

¹ Rather than focusing strictly on the environment, it was determined that the SEA should cover all three 'pillars' of sustainable development, i.e. the environmental, social and economic pillars. This is appropriate given that sustainable development is a stated objective for Neighbourhood Development Plans. It is also appropriate in that the SEA Regulations refer to 'sustainable development' and imply that 'the environment' should be conceived of in a broad sense.

Topic	Objectives
Economy	<ul style="list-style-type: none"> 18. Support development in existing centres and ensure the health of town centres 19. Encourage the retention and growth of existing, locally based industries and businesses 20. Accommodate new and expanding businesses 21. Encourage new investment in the local economy and promote development opportunities for employment 22. Focus growth on Core Strategy retail growth areas and designated frontages within the retail hierarchy
Heritage	<ul style="list-style-type: none"> 23. Promote high quality and sustainable urban design which protects and enhances the historic environment 24. Ensure enhancement of the public realm and local distinctiveness, taking into consideration the characteristics of the existing townscape and strategic views 25. Ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value
Housing	<ul style="list-style-type: none"> 26. Promote the provision of a range of high quality and affordable housing to meet local needs 27. Increase the net supply of housing, including affordable housing 28. Provide housing for people, particularly families, on low to moderate incomes 29. Encourage development at an appropriate density, standard, size and mix
Landscape / townscape	<ul style="list-style-type: none"> 30. Encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair 31. Ensure efficient use of land through maximising densities where appropriate
Transport	<ul style="list-style-type: none"> 32. Reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area 33. Encourage development at locations that enable walking, cycling and/or the use of public transport 34. Enhance permeability and encourage the provision of infrastructure for walking, cycling and/or the provision of public transport 35. Encourage an increase in car free and car capped housing 36. Guide significant travel generating developments towards areas with high public transport accessibility 37. Locate significant travel-demand generating uses, including new housing, in areas with high public transport accessibility and local services.
Water, flood risk and other climate change adaptation issues	<ul style="list-style-type: none"> 38. Protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change 39. Promote the sustainable use of water resources 40. Require development that incorporates sustainable drainage 41. Help to reduce the risk of flooding and increase flood resilience, including surface water flooding

WHAT HAS PLAN-MAKING / SEA INVOLVED UP TO THIS POINT?

The Environmental Report explains how **reasonable alternatives** were assessed in relation to **Kentish Town Potential Development Area**, i.e. the issue set to be addressed through Policy SP2 of the plan.

The Kentish Town Industrial Area, which comprises the adjacent Regis Road and Murphy Sites, stands out considerably amongst potential development sites in the area. There are no other sites where there is the potential for significant development in order to meet housing and employment needs (and contribute to wider plan objectives, notably those around movement and revitalising the Kentish Town Road). As such, the aspiration of KTNF is for a comprehensive redevelopment of the sites.

When looking to establish alternative approaches to comprehensive redevelopment of the site it was recognised that:

- A preferred approach had already emerged through informal discussions with local residents, wider stakeholders and also the promoters of a redevelopment scheme on the Regis Road part of the site. This would essentially involve 'a mixed use development whilst retaining, and where possible increasing, the level of industrial floorspace and employment opportunities including the growth of small and start-up businesses'.
- The objective of the plan is to develop a broad-brush, high level policy approach only. There will of course need to be subsequent work around masterplanning and infrastructure delivery (taking into account viability considerations), but it is not possible to go into detail through the current Neighbourhood Plan given the uncertainties involved. For example, it may or may not transpire that it is possible to bridge or deck over the railway line that currently divides the industrial area into two.

It was difficult to envisage alternatives to the emerging broad preferred approach; however, ultimately it was determined that there was merit in 'taking a step back' and appraising the following two alternatives:

Option 1 – Low density (in terms of housing) mixed-use development of the site

Option 2 - High density (in terms of housing) mixed-use development of the site.

These alternatives are somewhat crude, but there is merit in assessing them in that assessment findings help to frame and 'shed a light on' the emerging preferred policy.

Summary assessment findings are presented within the table below. For each option the assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics and issues/objectives identified through scoping as a methodological framework. **Red** shading is used to indicate significant negative effects, whilst **green** shading is used to indicate significant positive effects. A numbering system is also used to **rank** the performance of the alternatives, regardless of significant effects.

As well as presenting alternatives assessment findings, the Environmental Report also presents the KTNF's response, which essentially equates to the KTNF's justification for the preferred policy approach. Amongst other things, KTNF state that: "

"KTNF's preferred policy approach inevitably has some drawbacks (as highlighted in the SEA alternatives assessment). This is the last dedicated area of light industrial land and warehousing in Camden; however, whilst the land is valuable in its current use, there is an acute need to deliver housing, offices and space for 'start ups'. Light industrial space will be maintained through good design, and negative effects will be mitigated through a focus on skills development and training."

Summary alternatives assessment findings

(1) High density (in terms of housing) mixed-use development of the site (2) Low density (in terms of housing) mixed-use development of the site		
Topic	Effect categorisation / Rank of preference	
	Option 1	Option 2
Air quality and noise	★1	2
Biodiversity	★1	2
Climate change mitigation (non-transport related)	2	★1
Community and well-being	★1	★1
Economy	?	?
Heritage	★1	★1
Housing	2	★1
Landscape / townscape	★1	2
Transport	2	★1
Water, flood risk and other climate change adaptation issues	★1	2
<p><u>Summary</u></p> <p>A high density redevelopment would lead to the potential to maximise positive effects in terms of ‘housing’ objectives (i.e. there will be good potential to deliver affordable and specialist housing) and also climate change objectives (i.e. there will be good potential to deliver decentralised energy solutions). It may also be that it is preferable from a ‘community and well-being’ perspective; however, there are some uncertainties.</p> <p>A notable uncertainty is highlighted in terms of the ‘economic’ effects of a high density redevelopment. On the one hand it is a positive as it will be possible to increase the number of jobs on site and support a range of important growth sectors; but on the other hand there are concerns regarding the long term effect of losing light industrial space (given a London-wide trend towards high density mixed use redevelopment of light industrial land). Whilst there will be the potential to retain light industrial space as part of a mixed use redevelopment, this will obviously be constrained to some extent by housing under a high density scheme.</p> <p>With regards to biodiversity and landscape considerations it is possible to conclude with more certainty that a high density scheme could lead to problems; however, there is still considerable uncertainty. Landscape issues (i.e. views across the site) are a priority consideration, but it is not clear that there is risk of any significant impacts. With regards to biodiversity, it will be important that the green corridor running through the site (along the railway embankment) is taken into consideration as part of future work to explore options.</p>		

WHAT ARE THE ASSESSMENT FINDINGS AT THIS CURRENT STAGE?

An obvious aim of the Environmental Report is to present an assessment of the draft plan (under the SEA framework established through scoping). Summary assessment findings are presented here.

Air quality and noise

The March 2015 Environmental Report concluded that -

The entire borough of Camden is designated as an AQMA due to exceedences in NO₂ and particulate matter (PM₁₀). The NP is not predicted to negatively affect air quality or noise through redevelopment, and indeed is likely to increase air quality and noise issues through the enhancement of the public realm and cycling infrastructure. Some question marks remain regarding noise/amenity implications of mixed use redevelopment within the Kentish Town Potential Development Area (given the aspiration of maintaining industrial uses); however, there is good potential to minimise impacts through masterplanning and design.

These conclusions hold true at the current time. There is no reason to suggest that any of the changes made to the plan since March 2015 have implications for air quality or noise.

Biodiversity

The March 2015 Environmental Report concluded that -

The KTNP would likely lead to mixed effects in terms of biodiversity. Some policies aim to enhance or protect existing habitats, including through the extension of green corridors. The plan also encourages the creation of habitats through the landscaping and planting of native species in open spaces, private gardens and green roofs within new development. This would likely have a significant positive effect on biodiversity. However, decking over the railway corridor to the west could potentially have a significant negative effect on biodiversity through loss of part of a biodiverse habitat.

These conclusions hold true at the current time. There has been some rewording of Policy GO2: Protecting open spaces on Council Estates in light of consultation responses received from Camden; however, it remains the case that the policy performs well. Notably, the policy references the need to work with residents and communities to develop a vision for the area and to ensure a balance of the potential benefits for estates' residents, and open space considerations (quality and quantity). The latter considerations may also relate to biodiversity.

Climate change mitigation (non-transport related)

The March 2015 Environmental Report concluded that -

The NP policies make appropriate provision for climate change, both in terms of limiting greenhouse gas emission and adapting to the effects of climate change.

These conclusions hold true at the current time. Significant changes have been made in relation to the Kentish Town Potential Development Area, but it remains the case that the following policy criteria is set to be implemented: "Buildings and services will be expected to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation (which can include sources of site-related decentralised renewable energy) as stated in Camden policies DP22 and in accordance with CS13."

Community and well-being

The March 2015 Environmental Report concluded that -

Notwithstanding the recommendations made, overall the KTNP is considered to have a significant positive effect in terms of community and well-being objectives.

These conclusions hold true at the current time. Indeed, it is likely that changes made to the plan are supportive of community and well-being objectives, in particular changes made to ensure sensitive redevelopment within the Kentish Town Potential Development Area. Examining the latest version of this important policy, it can be seen that the policy addresses provision of new educational institutions and healthcare facilities.

Economy

The March 2015 Environmental Report concluded that -

Overall, the NP is likely to have a significant positive effect on 'the economy'

These conclusions hold true at the current time. Indeed, it is likely that changes made to the plan are supportive of 'economy' objectives, in particular changes made to ensure sensitive redevelopment within the Kentish Town Potential Development Area. It is understood that changes to this policy have been made in light of consultation responses received from Camden Borough Council and the Greater London Authority (GLA), both of whom have an interest in maintaining a balanced supply of employment land at the larger-than-local scale. GLA has a particular interest in maintaining support for the London Central Activities Zone (CAZ), and has identified the operations of the following businesses, within Kentish Town, as being important in this respect: UPS - just-in-time mail delivery and postal services to London markets; Royal Mail - sorting office and vehicle pound; Fairfax Meadow – meat supply and distribution to the food and accommodation sector inc. restaurants and hotels; EKO – bike delivery hub for courier services.

Since March 2015 some further evidence/understanding has emerged regarding the businesses operating on-site (although there remains more to understand, concerning individual occupants on the Estate, e.g. business supply chain relationships, the location of end markets, operational flexibilities and staff 'travel to work' patterns). Notably, it has been established that 'decanting' and relocating businesses occupying large floorplates and requiring extensive areas of land for vehicle circulation and storage will be a challenge. However, equally evidence of congestion close to the estate during peak periods suggests there may be opportunities to find better premises and sites for some of the businesses.

Heritage

The March 2015 Environmental Report concluded that -

Notwithstanding the recommendation made, overall it is considered that the KTNP would have a positive effect on heritage in the KTNP area.

These conclusions hold true at the current time, although it is recognised that the policy approach to the Kentish Town Potential Development Area is now less prescriptive, in particular in respect of building heights.

Housing

The March 2015 Environmental Report concluded that -

Overall, the KTNP is likely to have a significant positive effect in terms of housing.

These conclusions hold true at the current time. Examining the latest version of the important policy on the Kentish Town Potential Development Area, it can be seen that the policy requires provision of affordable housing in accordance with the London Plan Policy 3.10 and Camden's policy DP3; and housing for the growing population of the elderly is included in the proposed development in accordance with Camden policy DP7.

Landscape / townscape

The March 2015 Environmental Report concluded that -

Overall, the KTNP is likely to have a significant positive effect in terms of landscape/townscape.

These conclusions hold true at the current time. Examining the latest version of the important policy on the Kentish Town Potential Development Area, it can be seen that the policy requires green spaces, play spaces, leisure facilities and fully accessible public squares in accordance with Camden policies DP31 and CS15, and 'improvements to the environment of the area, including upgrading existing premises and creating modern employment space'. The policy is, however, less prescriptive than the March 2015 version in some respects, most notably in relation to building heights.

Transport

The March 2015 Environmental Report concluded that -

Overall, the NP is considered to have a significant positive effect in terms of transport.

These conclusions hold true at the current time. Examining the latest version of the important policy on the Kentish Town Potential Development Area, it can be seen that the policy requires west-east access routes for footpaths and cycle ways linking the site with Arctic Street and Spring Place in the west and Kentish Town Road in the east; and states that: “Apart from parking for essential users (e.g. emergency services) and Blue Badge permit holders, any development will be car free.”

Water, flood risk and other climate change adaptation issues

The March 2015 Environmental Report concluded that -

Overall, the NP is not considered to have any effect in terms of water, flood risk and climate change adaptation.

These conclusions hold true at the current time.

WHAT ARE THE NEXT STEPS?

Regulation 17 requires that the Local Authority submits (to the person appointed to carry out the Examination) the Proposed Plan and a copy of any representations which have been made on the Submission Draft Plan (and this Environmental Report Update). It may be appropriate for the Local Authority to also submit this Environmental Report Update, with a view to informing the Examination.

Regulations 18 and 19 require that, subsequent to the Examination, the Local Authority publishes the Examiner’s Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to ‘make’ (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated Environmental Report, with a view to informing the Referendum.

Regulation 20 states what the Local Authority must do when the plan is ‘made’ (i.e. adopted). The SEA Statement must be published alongside the made Plan. The SEA Statement must present:

- information on the decision, i.e. must explain why the final plan approach was decided-upon in light of SEA and consultation; and
- measures decided concerning monitoring.

At the current stage – i.e. in the Environmental Report - there is a need to present ‘a description of the measures envisaged concerning monitoring’ only. In light of the appraisal findings presented in this report, it is suggested that monitoring might focus on biodiversity and economic objectives.

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