

# Saffron Hill: Health Impact Assessment

A Final Report by Hatch  
March 2024

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# 1. Introduction

- 1.1 This Health Impact Assessment (HIA) has been prepared by Hatch on behalf of Saffron Hill Investment Holdings Ltd ('the Applicant') in support of a planning application for the redevelopment of Saffron Hill, Farringdon, London EC1N 8UN ("the Site") within Camden.
- 1.2 The National Planning Practice Guidance (PPG) states that local planning authorities should ensure that the healthcare infrastructure implications of any relevant proposed local development are considered. The PPG also refers to Health Impact Assessment (HIA) as a useful tool to assess and address the impacts of development proposals (paragraph ref 53-004-20140306).
- 1.3 At the regional level, the London Plan<sup>1</sup> (see **Policy GG3: Creating a healthy city**) indicates that the Mayor will take account of the potential impact of development proposals on health and health inequalities within London and those involved in planning and development must '*assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments*'.
- 1.4 At the local Level, Camden's **Planning for Health and Wellbeing**<sup>2</sup> provides guidance on how Camden will manage impacts related to health and wellbeing including identifying how the planning process can enhance the quality of life for population groups with greater health and wellbeing needs.
- 1.5 It supports the Camden Local Plan and helps to deliver the **Camden Local Plan Policy C1<sup>3</sup>: Health and Wellbeing**. The policy states that Camden aim to work with a range of local partners and services to support health, social and cultural wellbeing and reduce inequalities, implementing measures that will help contribute to healthier communities. Under this policy they expect developers and development to:
  - positively contribute to creating high quality, active, safe and accessible places
  - consider the needs of occupants and users in terms of accessibility, space requirements and ease of movement
  - ensure that new developments do not unduly affect existing sensitive uses
  - create places that make it easier to take part in physical activity, access healthier food choices, and access spaces for play, sport and recreation
  - consider the impacts of overheating and flooding on human health and should be designed so that they are adaptable
- 1.6 The policy also highlights key challenges to the area. Camden has one of the largest health inequality gaps between occupational groups in England for both men and women, and there are stark geographical health inequalities in Camden. In response to this, the policy seeks to ensure that development in Camden considers local issues relating to health and wellbeing at

<sup>1</sup> Greater London Authority, The London Plan, 2021

<sup>2</sup> Camden Council, Camden Planning Guidance: Planning for health and wellbeing, 2021

<sup>3</sup> Camden Council, Camden Local Plan, 2017

an early stage of the planning process in order to positively improve outcomes for the people who live, work and visit the borough.

- 1.7 The remainder of this section describes the Proposed Development and sets out the methodology for undertaking the HIA. Section 2 provides an overview of the profile of the local population, and Section 3 comprises the HIA itself.

## Development Proposals

- 1.8 The existing site comprises of a 1960s building made up of a car park from basement to level 6, and offices from level 7 to 8. The site lies within the Hatton Garden Conservation Area, to which the existing building is noted as a negative contributor, and there are no listed buildings on site. The external facades are mostly metal with precast concrete lattice elements at ground floor. The main car park entrance is located on St. Cross street, a sperate office entrance is also located on St. Cross street and secondary fire exits are located on Saffron Hill and Saffron Street
- 1.9 The Proposed Development is described as follows:
- Demolition of existing car park and offices, and erection of a new building providing Class E Commercial floorspace and flexible Class E café/restaurant space, along with associated landscaping and works.
- 1.10 The proposed uses on site will be commercial office space across all floors, with café/restaurant space at ground floor level.

## Assessment Methodology

- 1.11 The World Health Organisation (WHO) Europe defines health as ‘a state of complete physical mental and social well-being and not merely the absence of disease or infirmity’<sup>4</sup>. Factors that have the most significant influence on the health of a population are called ‘determinants of health’ defined by WHO as ‘the range of personal, social, economic and environmental factors which determine the health status of individuals and populations’.
- 1.12 The London Health Urban Development Unit (HUDU) Planning for Health Rapid HIA Tool Fourth Edition (October 2019) recommends the assessment of potential health impacts under 11 different broad health determinants. It does not identify all issues related to health and wellbeing but focuses on the built environment and issues directly or indirectly influenced by planning decisions. The 11 determinants are described in Table 1.1 below.

Table 1.1 Health Determinants	
Health Determinant	Potential Health Impacts
Housing quality and design	Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management also has impact on community welfare, cohesion and mental wellbeing.
Access to healthcare services and other social infrastructure	Strong, vibrant, sustainable and cohesive communities require good quality, accessible public services and infrastructure. Access to social infrastructure and other services is a key component of Lifetime Neighbourhoods. Encouraging the use of local services is influenced by

<sup>4</sup> <https://www.who.int/healthpromotion/about/HPR%20Glossary%201998.pdf?ua=1>

	accessibility, in terms of transport and access into a building, and the range and quality of services offered. Access to good quality health and social care, education (primary, secondary and post-19) and community facilities has a direct positive effect on human health. Opportunities for the community to participate in the planning of these services has the potential to impact positively on mental health and wellbeing and can lead to greater community cohesion.
Access to open space and nature	<p>Providing secure, convenient and attractive open/green space can lead to more physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is growing evidence that access to parks and open spaces and nature can help to maintain or improve mental health.</p> <p>The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour; a growing number of children are missing out on regular exercise, and an increasing number of children are being diagnosed as obese. Access to play spaces, community or sport facilities such as sport pitches can encourage physical activity. There is a strong correlation between the quality of open space and the frequency of use for physical activity, social interaction or relaxation.</p>
Air quality, noise and neighbourhood amenity	The quality of the local environment can have a significant impact on physical and mental health. Pollution caused by construction, traffic and commercial activity can result in poor air quality, noise nuisance and vibration. Poor air quality is linked to incidence of chronic lung disease (chronic bronchitis or emphysema) and heart conditions and asthma levels of among children. Noise pollution can have a detrimental impact on health resulting in sleep disturbance, cardiovascular and psycho-physiological effects. Good design and the separation of land uses can lessen noise impacts.
Accessibility and active travel	Convenient access to a range of services and facilities minimises the need to travel and provides greater opportunities for social interaction. Buildings and spaces that are easily accessible and safe also encourage all groups, including older people and people with a disability, to use them. Discouraging car use and providing opportunities for walking and cycling can increase physical activity and help prevent chronic diseases, reduce risk of premature death and improve mental health
Crime reduction and community safety	<p>Thoughtful planning and urban design that promotes natural surveillance and social interaction can help to reduce crime and the 'fear of crime', both of which impacts on the mental wellbeing of residents. As well as the immediate physical and psychological impact of being a victim of crime, people can also suffer indirect long-term health consequences including disability, victimisation and isolation because of fear. Community engagement in development proposals can lessen fears and concerns.</p> <p>New environmental impact assessment regulations entering into force in 2017 require consideration of any significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.</p>
Access to healthy food	<p>Access to healthy and nutritious food can improve diet and prevent chronic diseases related to obesity. People on low incomes, including young families, older people are the least able to eat well because of lack of access to nutritious food. They are more likely to have access to food that is high in salt, oil, energy-dense fat and sugar.</p> <p>Opportunities to grow and purchase local healthy food and limiting concentrations of hot food takeaways can change eating behaviour and improve physical and mental health.</p>
Access to work and training	Employment and income is a key determinant of health and wellbeing. Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Works aids recovery from physical and mental illnesses.

Social cohesion and lifetime neighbourhoods	<p>Friendship and supportive networks in a community can help to reduce depression and levels of chronic illness as well as speed recovery after illness and improve wellbeing. Fragmentation of social structures can lead to communities demarcated by socio-economic status, age and/or ethnicity, which can lead to isolation, insecurity and a lack of cohesion. Voluntary and community groups, properly supported, can help to build up networks for people who are isolated and disconnected, and to provide meaningful interaction to improve mental wellbeing.</p> <p>Lifetime Neighbourhoods places the design criteria of Lifetime Homes into a wider context. It encourages planners to help create environments that people of all ages and abilities can access and enjoy, and to facilitate communities that people can participate in, interact and feel safe.</p>
Minimising the use of resources	<p>Reducing or minimising waste including disposal, processes for construction as well as encouraging recycling at all levels can improve human health directly and indirectly by minimising environmental impact, such as air pollution.</p>
Climate change	<p>There is a clear link between climate change and health. The Marmot Review is clear that local areas should prioritise policies and interventions that ‘reduce both health inequalities and mitigate climate change’ because of the likelihood that people with the poorest health would be hit hardest by the impacts of climate change.</p> <p>Planning is at the forefront of both trying to reduce carbon emissions and to adapt urban environments to cope with higher temperatures, more uncertain rainfall, and more extreme weather events and their impacts such as flooding. Poorly designed homes can lead to fuel poverty in winter and overheating in summer contributing to excess winter and summer deaths. Developments that take advantage of sunlight, tree planting and accessible green/brown roofs also have the potential to contribute towards the mental wellbeing of residents.</p>

Source: HUDU Rapid Impact Assessment Tool, October 2019, Fourth Edition

- 1.13 The Tool has been designed to use existing evidence to assess the likely health impacts of development plans and proposals and recommend measures to address negative impacts and maximise benefits. The process looks at the positive and negative health impacts of a development as well as assessing the indirect implications for the wider community. For each health determinant, the rapid HIA tool has been completed drawing on evidence and assessments of impact within the following documents:

- Design and Access Statement
- Circular Economy Statement
- The Sustainability Brief
- Pre-Development Audit
- Material Efficiency Strategy
- Landscape Strategy
- Energy Strategy
- Flood Risk Assessment and Drainage Strategy Report
- Sustainable Design and Construction Statement
- Design Review Panel Presentation
- Statement of Community Involvement

- 1.14 Each of the above documents is referenced throughout the assessment and provide detailed information in terms of the method of assessing impacts for each of the specialist areas. Where appropriate, these documents have been supplemented with information from discussions with the appropriate technical leads for each of the specialist areas.
- 1.15 The HIA covers a wide range of health determinants and is largely a qualitative assessment, rather than quantitative. There is no formal or statutory requirement to assess or measure the significance of effects within a standalone HIA and for the most part, it is not possible to quantify the severity or extent of the effects which give rise to these impacts. Indeed, HUDU notes *'it may not be possible to quantify the impacts as many of the effects on an individual's or community's health are not easily measurable and many health effects are indirect and take many years to manifest themselves'*. To this end, the potential health impacts are described as outlined in Table 1.2 below, based on broad categories for the identified qualitative impacts. However, where the HIA has drawn on the assessments of effects presented within relevant ES Chapters, the significance of effect is stated in addition to being identified as either positive (beneficial), neutral, negative (adverse) or uncertain.

Table 1.2 HIA Impact Categories

Positive	A beneficial impact is identified
Neutral	No discernible health impact is identified
Negative	An adverse impact is identified
Uncertain	Where uncertainty exists as to the overall impact

HUDU Rapid Impact Assessment Tool, 2019, Third Edition

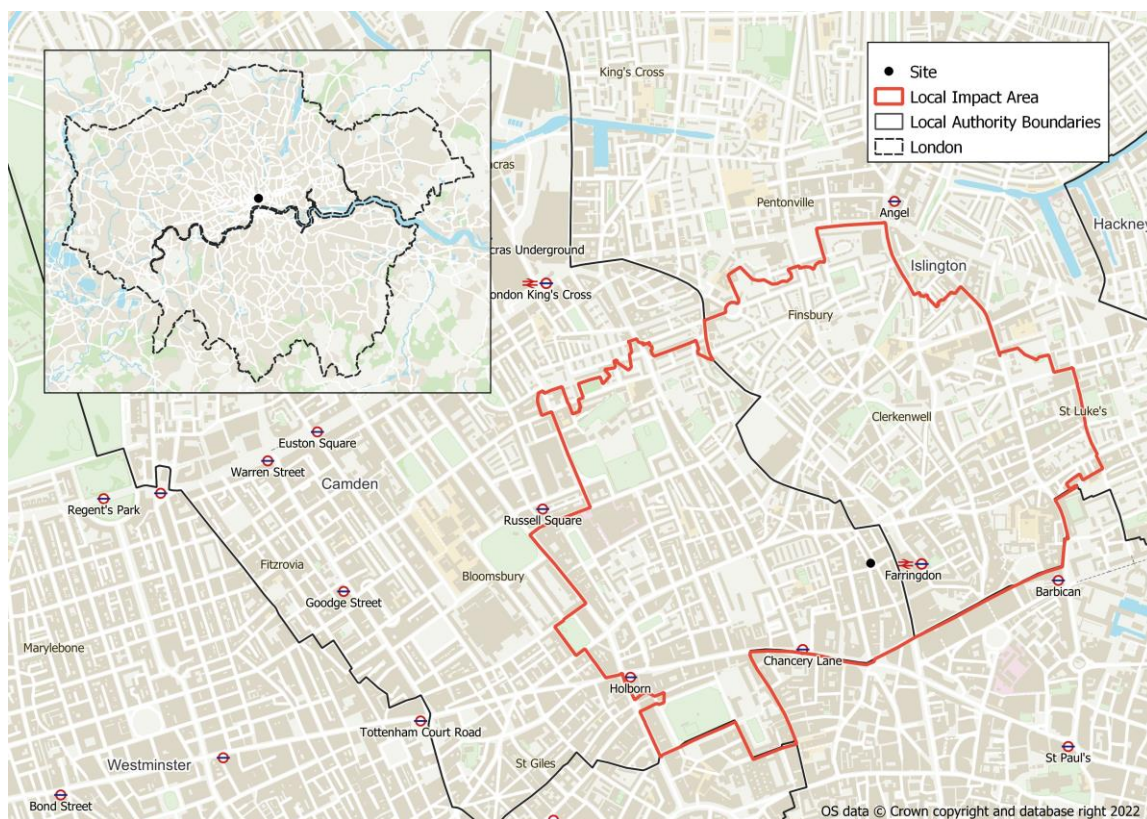
- 1.16 Actions have been identified to mitigate any negative impact on health and opportunities to enhance health benefits where relevant have also been identified.



## 2. Local Context

- 2.1 The geographical extent of the impacts assessed within this HIA is dependent upon the type of effects and receptors. Impact areas and associated baseline conditions are defined within each of the relevant ES Chapters and documents that this HIA has drawn on and will vary depending on the health determinant and receptor. This section focuses on the area surrounding the site in order to provide a demographic context of the existing community locally. The Local Impact Area (LIA) for this section is outlined in the map below.

Figure 2.1 Local Impact Area Map



Source: Hatch, 2023. OS data © Crown copyright and database right 2023.

- 2.2 According to ONS Population Estimates 2020, the LIA has a population of 32,146. The LIA's working age (16-64) population accounts for 79% of the total population, a higher proportion than Camden (71%) and London (67%). The elderly aged (65+) is lower at 8% of the population, lower than both Camden and London's proportion of elderly population, which account for 12% of both areas' total populations.
- 2.3 The LIA's population has increased by 17% since 2015 which is slightly higher than the increase seen in Camden (15%) and significantly higher than the increase seen in London (4%). Breaking down this population demographically indicates that this growth was driven by relatively high growth across all groups, particularly within the working aged population which saw a population increase of 19%. The elderly population (65+) saw an increase of 17% over the period, which was lower than Camden (19%) but greater than London (10%).

Table 2.1 Population &amp; Demographic Structure

	Local Impact Area	Camden	London
<b>Population Estimates 2015</b>			
Total population	32,146	243,837	8,666,930
Aged 0-15 (%)	13%	17%	21%
Working aged 16-64 (%)	78%	71%	67%
Aged 65+ (%)	8%	12%	12%
<b>Population Estimates 2020</b>			
Total population	37,730	279,516	9,002,488
% increase from 2015	+17%	+15%	+4%
Aged 0-15 (% increase)	+7%	+15%	+5%
Aged 16-64 (% increase)	+19%	+14%	+3%
Aged 65+ (% increase)	+17%	+19%	+10%

Source: ONS Mid Year Population Estimates 2021

- 2.4 Along with having strong population growth, the population density of the LIA is relatively high at 14,500 (residents per square kilometre) compared to 9,600 (residents per square kilometre) in Camden, yet it is in line with 14,600 (residents per square kilometre) in the neighbouring borough of Islington.
- 2.5 The LIA also has comparatively high economic activity rates at 84%, which is higher than both the Camden average (75%) and London average (78%). Camden's unemployment rate between April 2022 and March 2023 was 4.3%, which is in line with the London average (4.4%), but slightly higher than the national average (3.7%). Whilst there is no unemployment data for the LIA, the most recent claimant count data shows that around 1,050 people were still claiming job seekers support in March 2023, which is 70% higher than pre-covid numbers in December 2019.

Table 2.2 Economic Activity &amp; Employment

	Local Impact Area	Camden	London
Economic activity rate (2013)	76.8%	71.8%	75.8%
Economic activity rate (2023)	83.9%	74.6%	79.2%
Unemployment rate (2013)	6.4%	8.4%	9.3%
Unemployment rate (2023)	-	4.3%	4.4%

Source: ONS Annual Population Survey 2023

- 2.6 In terms of qualifications, as of 2021, 51.9% of people aged 16-64 in the LIA had a level 4 qualification or above, which was higher than the average for London at 59.0%, but below the average for Camden at 66.4% (APS, 2021). When looking at the proportion of the population with no qualifications, 9.0% of people aged 16-64 in the LIA had no qualifications, which is higher than both London (5.5%) and Camden (6.2%).

Table 2.3 Qualifications

	Local Impact Area	Camden	London
% NVQ4+ (2011)	-	55.2%	45.3%
% NVQ4+ (2021)	51.9%	66.4%	59.0%
% No qualifications (2011)	-	8.5%	9.4%
% No qualifications (2021)	9.0%	6.2%	5.5%

Source: ONS Annual Population Survey 2022

## Deprivation

- 2.7 Camden is in the most 40% most deprived local authorities in the country ranking at 132<sup>nd</sup> out of 317 authority areas (where 1 is the worst performing). As well as a relatively high level of overall deprivation Camden also has varying levels of deprivation across the sub-domains. For example, Camden experiences particular challenges with living environment deprivation (ranking as the 22<sup>nd</sup> most deprived local authority nationally) and crime deprivation (ranking as the 70<sup>th</sup> most deprived nationally).
- 2.8 Contrastingly, Camden has fewer challenges around health and education deprivation, ranking as the 207<sup>th</sup> and 274<sup>th</sup> most deprived local authority nationally.
- 2.9 The level of deprivation in the immediate vicinity of the Saffron Hill site is relatively low, however directly to the west of the site there is an area that ranks in the top 20% most deprived nationally which runs alongside Leather Lane. This is primarily driven by income deprivation (top 10% most deprived nationally), living environment deprivation (top 20% most deprived nationally), and employment deprivation (top 20% most deprived nationally).
- 2.10 There is also a pocket of high deprivation north of the site, which is where the densely populated Finsbury Estate and the Spa Green Estate are located. High rates of deprivation in this area are being driven by barriers to housing and services, income, and living environment deprivation, which all rank in the 20% most deprived nationally.
- 2.11 The Camden Local Plan<sup>5</sup> states that generally the residents who are suffering from poor general health, poor mental health, and low life expectancy are generally concentrated in the borough's most deprived wards which include Haverstock, Kilburn and the nearby ward of St Pancras and Somers Town. Additionally, the Camden Health and Wellbeing Strategy states that those living in the most deprived areas spend 20 years of their life living in poor health and die around 10 years earlier than those living in the least deprived areas.
- 2.12 The Camden Health and Wellbeing Strategy acknowledges the link between deprivation and health, particularly with regards to hospital admissions for children with asthma. It states that two thirds of the children in Camden who are admitted to hospital due to asthma, live in the two most deprived quintiles of Camden<sup>6</sup>. The Income Deprivation Affecting Children Index shows the proportion of children aged 0 to 15 years old that are living in income deprived families in 2019, with Camden ranking as the 85<sup>th</sup> most deprived nationally in this domain.
- 2.13 In terms of the older population, Income Deprivation Affecting Older People Index shows the proportion of those aged 60 or over who experience income deprivation, with Camden ranking as the 27<sup>th</sup> most deprived nationally in this domain. The Health and Wellbeing Strategy<sup>7</sup> states that social isolation is also a significant health risk amongst older residents which has been exacerbated by covid and the digital divide.

<sup>5</sup> Camden Local Plan 2017

<sup>6</sup> Camden Health and Wellbeing Strategy, 2022-30.

<sup>7</sup> Camden Health and Wellbeing Strategy, 2022-30.

## Health and Wellbeing

- 2.14 The Camden Local Plan<sup>8</sup> states that the authority has one of the largest health inequality gaps between occupational groups in England for both men and women in addition to stark health inequalities geographically, with many of these health inequalities exacerbated by Covid-19.
- 2.15 Camden's Joint Health and Wellbeing Strategy<sup>9</sup> identifies 6 key areas of concern for those aged 18-64 including mental wellbeing, employment, alcohol, long term health conditions, disabilities and social needs, and complex health needs. Within the older demographic (aged 65+) the strategy identifies that although people in Camden are living longer, residents on average spend the last 20 years of their life in poor health.
- 2.16 Mortality rates are highest among those with cancer, cardiovascular disease and respiratory diseases, but mortality for all three causes of death has been declining and is lower in Camden than the average across London and England<sup>10</sup>.
- 2.17 Camden continues to face challenges related to alcohol. In line with national trends, Camden's alcohol-related hospital admissions have increased since 2011, and the rate in Camden is higher than both London and England. People who are otherwise healthy but who have one or more behavioural/lifestyle risk factors (including alcohol) makes up the second largest segment of Camden residents aged 18-64. Men are more likely to belong to this group, along with residents from Black, Mixed and White ethnic groups and residents from the most deprived areas of the borough.

## Mental Health

- 2.18 Camden's Joint Strategic Needs Assessment<sup>11</sup> sets out the overall health and wellbeing of Camden residents. It outlines that the proportion of people with depression and/or serious mental illness is higher in Camden than the London average. People who are otherwise healthy yet have a common mental illness make up a large proportion of those aged 18-64 years old. Continuing the pattern seen in young people, women are more likely to belong to this population segment, as are residents from Mixed and White ethnic groups and residents from the most deprived areas of the borough. When looking specifically at the young population, Camden has a similar estimated prevalence of mental health disorders in this age group compared to London and England. However, child hospital admissions for mental health conditions in Camden (118 per 100,000) are much higher than London and England (73 and 88 per 100,000) .
- 2.19 Camden and Islington also have a Suicide Prevention Strategy and Action Plan 2022-2027 which works alongside both authorities Health and Wellbeing Strategy's.

## Young People

- 2.20 Camden's Joint Strategic Needs Assessment<sup>12</sup> aims to ensure that young people and children are healthy and ready for school by improving the uptake of childhood immunisations to ensure that children are protected against serious illness. Currently pre-school immunisations in

<sup>8</sup> Camden Local Plan 2017

<sup>9</sup> Camden Health and Wellbeing Strategy, 2022-30

<sup>10</sup> Camden Health and Wellbeing Strategy, 2022-30

<sup>11</sup> Camden Joint Strategic Needs Assessment 2020

<sup>12</sup> Camden Health and Wellbeing Strategy, 2022-30

Camden are lower than the London average with only 25% of children beginning school with their early years immunisations and the borough is making efforts to increase uptake, learning from the Covid-19 vaccination programme.

- 2.21 Additionally, Camden policy seeks to address levels of childhood asthma given that Camden has relatively high hospital admissions rates for children's asthma (694 per 100,000 registered population) compared with neighbouring boroughs. Work is already underway to support children and young people with asthma with the implementation of The Camden Children's Asthma Strategic Plan which sets out local priorities for addressing asthma in children.
- 2.22 In Camden, children aged 10-11 years living in the most deprived areas of Camden are significantly more likely to be overweight or obese compared to those in the most affluent parts. Additionally, boys, and children from Asian and Black ethnic groups are more likely to be overweight or obese than girls and children from White ethnic group<sup>13</sup>.

### **Pharmaceutical Needs**

- 2.23 There are nine GP's practices within one-mile of the Site with a total of 100,605 registered patients and 45 FTE GP's<sup>14</sup>. This gives rise to an average of 2,257 patients per FTE GP which is well above the HUDU benchmark of 1,800. In addition, the latest Pharmaceutical Needs Assessment 2022 (Draft) found there is no gaps in the Pharmacy services within Camden<sup>15</sup>.

<sup>13</sup> Camden Joint Strategic Needs Assessment 2020

<sup>14</sup> NHS General Practice Workforce, June 2023

<sup>15</sup> PNA ([Camden Draft Pharmaceutical Needs Assessment 2022](#))



### 3. The Assessment

#### Access to Healthcare Services and Other Social Infrastructure

Table 3.1 Access to Healthcare Services and Other Social Infrastructure

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
2.1 Does the proposal retain or re-provide existing social infrastructure?	No	N/A	N/A	N/A
2.2 Does the proposal assess the impact on healthcare services?	No	N/A	N/A	N/A
2.3 Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	No	N/A	N/A	N/A
2.4 Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g., schools, social care and community facilities?	No	N/A	N/A	N/A
2.5 Does the proposal explore opportunities for shared community use and colocation of services?	Yes	The Proposed Development will provide affordable workspace provision on the ground floor which will be available for use by the local community, local businesses, or social enterprises. A café will also be provided on the ground floor which will be open to the public. A number of improvements to the public realm will be implemented as well, through the provision of street trees, benches and planters on St Cross Street (DAS, p.60).	Positive	No mitigation measures required.

## Access to Open Space and Nature

Table 3.2 Access to Open Space and Nature

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
3.1 Does the proposal retain and enhance existing open and natural spaces?	No	There are no existing open and natural spaces within the Site.	Neutral	No mitigation measures required.
3.2 In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	Yes	The building will provide usable amenity terraces across four floors, providing tenants with access to urban green spaces (Landscape Strategy p.2). The surrounding public realm will also be improved through the introduction of street trees, public benches and a pocket park located on the corner of Cross Street (DAS, p.60). The pocket park will be located directly in front of the café entrance and will increase greening to St Cross Street whilst also creating spaces for pedestrians and passersby to dwell and inhibit (DAS p.64).	Positive	No mitigation measures required.
3.3 Does the proposal provide a range of play spaces for children and young people?	No	There is no residential element to the proposed Development and therefore no requirement to provide play spaces. However, the spaces within the public realm will be accessible to children of all ages.	Neutral	No mitigation measures required.
3.4 Does the proposal provide links between open and natural spaces and the public realm?	Yes	The Proposed Development will make improvements to the public realm in the areas surrounding the site. There will be a provision of street trees, benches and green space through a pocket park on the corner of Cross Street, providing accessible green space (DAS, p.120). Additionally, a pavement will be introduced for public realm and environmental benefit, which will increase connectivity between existing open spaces and the proposed green spaces as a result of the development (DAS, p.128).	Positive	No mitigation measures required.

3.5 Are the open and natural spaces welcoming and safe and accessible for all?	Yes	<p>The green roof terraces will only be accessible to tenants of the building, however there will be a variety of public realm improvements in the surrounding area which will provide additional urban green space (DAS p.61).</p> <p>As part of this public realm improvement, new street trees will be planted for a greener streetscape, new public seating will be provided and a pocket park will be created outside of the café which will be accessible to all, providing open, green space to the public (DAS, p.65). This activation of frontage will increase natural surveillance and lead to a greater feeling of safety.</p>	Positive	No mitigation measures required.
3.6 Does the proposal set out how new open space will be managed and maintained?	Yes	<p>The landscape has been devised to create a range of complimentary new habitats and there will be routine maintenance tasks aimed to encourage biodiversity whilst allowing amenity use. To maintain this, an ecologically led maintenance approach is proposed, in which safety is prioritised first, then the viability and long-term health of biodiverse habitats, and then amenity use and value (Landscape Strategy, p.16).</p> <p>The Landscape Maintenance Strategy has been prepared in the context of a thorough and detailed understanding of the site landscape and its context and within the framework of relevant policy and design guidance (DAS p.68). As a result, each habitat area will require different seasonal actions to help the matrix of new and existing habitats to establish and be suitably maintained (DAS p.68).</p> <p>The SUDS rain gardens will also be checked regularly, and any blockages cleared to maintain their function (Landscape Strategy, p.16).</p>	Positive	Implement the Landscape Maintenance Strategy as outlined in the Landscape Strategy.



## Air Quality and Noise

Table 3.3 Air Quality and Noise

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
4.1 Does the proposal minimise construction impacts such as dust, noise, vibration, and odours?	Yes	<p>During construction, air quality impacts are likely to be local to the development, however they will be temporary in nature (i.e. during the demolition and construction period only). The construction phase impacts will be mitigated through the adoption of best practice guidance (Sustainable Design and Construction Statement, p.34).</p> <p>All contractors shall follow a regime put in place during the construction stages to minimise emissions and comply with the relevant EA Pollution Prevention Guidelines. The contractor will sign up to achieve 'beyond best practice' standards with the Considerate Constructors Scheme (Sustainable Design and Construction Statement, p.34).</p>	Neutral	Implement the relevant best practice guidance to ensure that construction impact are minimised.
4.2 Does the proposal minimise air pollution caused by traffic and energy facilities?	Yes	<p>The proposed development will result in the demolition of an existing carpark leading to a reduction in traffic in the local area which will likely result in less air pollution. The development will also be car-free with one designated disabled parking space available on Saffron Street and it will encourage all the occupancy to cycle or take other modes of sustainable transport, therefore car usage will be reduced significantly which will minimise current air pollution, noise levels, and congestion (Sustainable Construction Statement, p. 42).</p> <p>Delivery and servicing teams will be advised to utilise major local roads when reaching the Site, limiting the use of narrower sections of highway. It is anticipated that vehicles will make use of the A201 Farringdon Road principally, with vehicles then either entering</p>	Positive	No mitigation measures required.

		<p>Saffron Street directly and performing a 3-point turn to egress back onto Farringdon Road or utilising the local network circulation to maintain forward gear movements only (DAS, p.110).</p> <p>Targets will also be put in place by the proposed development with the aim to reduce the impact of service deliveries in an effort to minimise traffic. Deliveries to the proposed development where possible, will be undertaken by small to medium sized vehicles (e.g., bicycles, motorbikes, and vans) and electric or hybrid vehicles. Additionally, the proposed development aims to reduce the number of deliveries, where possible, through consolidation, shared suppliers and using locally based suppliers (DAS, p.110).</p>		
4.3 Does the proposal minimise noise pollution caused by traffic and commercial uses?	Yes	<p>The proposed development will result in the demolition of an existing carpark leading to a reduction in traffic in the local area which will likely result in less noise pollution once the development is in operation. The development will also be car-free with one designated disabled parking space available on Saffron Street and it will encourage all the occupancy to cycle or take other modes of sustainable transport, therefore car usage will be reduced significantly which will minimise air pollution, noise levels, and congestion (Sustainable Construction Statement, p. 42).</p>	Positive	No mitigation measures required.

## Accessibility and Active Travel

Table 3.4 Accessibility and Active Travel

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
5.1 Does the proposal address the ten Healthy Streets indicators?	No	The proposals support the principles of the London Plans Healthy Streets Approach and aim to reduce the dominance of vehicles on London's streets.	Positive	No mitigation measures required.

		Cycling and walking will be promoted,, including through ensuring permeability by foot and cycle and providing connection to local walking and cycling networks (Sustainable Design and Construction Statement, p.14).		
5.2 Does the proposal prioritise and encourage walking (such as through shared spaces?)	Yes	<p>The Site is highly accessible on foot and the adjacent pedestrian network provides a good level of accessibility to surrounding facilities, including public transport nodes and local amenities. The proposed development will open up the some of the ground floor to the public through the provision of a café providing improvement to pedestrian amenity in the immediate vicinity of the Site (DAS, p.6).</p> <p>The Proposed Development will include changes to Saffron Street, including making improvements to the roads, making them safer for pedestrians and cyclists (Design Review Panel, p.58).</p>	Positive	No mitigation measures required.
5.3 Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	Yes	The Proposed Development will provide for safer and enhanced pedestrian and cyclist activity (DAS, p.6). Additionally, it will encourage active and sustainable methods of travel by providing 195 cycle spaces in addition to 15 short stay cycle spaces. There is a specific cycle entrance with a dedicated lift and stair well (DAS, p.31). End of trip facilities will also be provided on site with a total of 136 lockers to store cyclists' belongings, 8 showers in total, 2 accessible showers in total, and 2 drying rooms (Design Review Panel, p.59).	Positive	No mitigation measures required.
5.4 Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	Yes	<p>The Proposed Development will open up some of the ground floor of the site as a cafe which will improve the pedestrian environment surrounding the site offering greater permeability.</p> <p>The Site is also located along the TfL Cycleways Cycleway 6 (northbound lane to the west on Saffron Hill and southbound lane to the east on the A201 Farringdon Road). This Cycleway connects Camden</p>	Positive	No mitigation measures required.

		<p>Town to the north with Elephant &amp; Castle in the south. Cycleway 6 provides connections to the numerous other TfL cycle routes that operate in around central London, such as Cycleway 3 which connects to Barking via Canary Wharf to the east and to Paddington via Victoria to the west (DAS, p.16). To maximise access and use of active travel using these cycle ways, cycle access will be provided on Saffron Street, where cycle lifts and stairs with wheeling ramps will be provided to the basement areas which accommodate the cycle parking and end of trip facilities. There will also be 195 long stay cycle parking spaces and 15 short stay cycle parking spaces (Design Review Panel, p. 59).</p>		
5.5 Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	No	N/A	N/A	N/A
5.6 Is the proposal well connected to public transport, local services and facilities?	Yes	<p>The Site is highly accessible by public transport (PTAL of 6b), and Farringdon station, the closest access point, is located at a walk distance of 270m and provides access to the Circle, Hammersmith &amp; City, and Metropolitan Lines (DAS, p.30).</p> <p>Other public transport links are located nearby including a number of bus stops and Chancery Lane station, highlighting existing connectivity to the public transport and pedestrian networks. The public realm improvements will also enhance the pedestrian network (DAS, p.30).</p>	Positive	No mitigation measures required.
5.7 Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	Yes	The Proposed Development will be car-free with no parking provided on-site aside from disabled parking spaces to ensure the development is accessible (DAS, p. 58). The Site is also located along the TfL Cycleways Cycleway 6 and connects Camden Town to the north with Elephant & Castle in the south (DAS, p.16).	Positive	No mitigation measures required.

5.8 Does the proposal allow people with mobility problems or a disability to access buildings and places?	Yes	The Proposed Development will provide disabled parking on site to ensure that the development is accessible to all (DAS, p.58). The building is also served by a number of lifts which provide access to the office spaces and basement levels for those with mobility issues (DAS, p.60). Additionally, all stairs within the building will meet Building Regulations and BS 8300 guidelines for use by people with ambulant and visual disabilities (DAS, p.140). The public realm will provide a clear and inclusive environment suitable and safe for everyone, including people with disabilities, the elderly, and children in pushchairs.	Neutral	No mitigation measures required.
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## Crime Reduction and Community Safety

**Table 3.5 Crime Reduction and Community Safety**

<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
6.1 Does the proposal incorporate elements to help design out crime?	Yes	A lighting scheme will be developed to deliver light levels which support the safety initiatives in the area (DAS, p.71).	Neutral	No mitigation measures required.
6.2 Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	No	N/A	N/A	N/A
6.3 Does the proposal include attractive, multi-use public spaces and buildings?	Yes	The character, identity, and amenity of this part of Camden would be transformed by the proposal. The current car park is seen as a negative contributor to the Hatton Garden Conservation Area and therefore the public experience of the street would be enhanced by the new building with an improved, sleek design that is more in line with the area (DAS, p.8).	Positive	No mitigation measures required.
6.4 Has engagement and consultation been carried out with the local community?	Yes	As part of the pre-planning application phase, a period of engagement was undertaken with people who live and work close to the site, which focused on	Positive	N/A

sharing proposals for the new building. The pre-application public consultation included:

- Flyers sent to 1,263 addresses of local residents and businesses near the site including information about the plans, and how to leave feedback online
- A pop-up session was held on the 24<sup>th</sup> January 2024
- The launch of a dedicated project consultation website, which included the project proposals and guidance on how to leave feedback and contact the team

The outcomes of this process have been used to inform the design and this is detailed in the Statement of Community Involvement (Sustainable Design and Construction Statement, p.45). There is also ongoing consultation with neighbouring occupiers.

## Access to Healthy Food

Table 3.6 Access to Healthy Food

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
7.1 Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers' markets?	No	N/A	N/A	N/A
7.2 Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Yes	The publicly accessible café, as part of the proposed Development could be occupied (in part) by a social enterprise.	Positive	No mitigation measures required
7.3 Does the proposal avoid contributing towards an overconcentration of hot food takeaways in the local area	Yes	The Proposed Development does not include the provision space for hot food takeaways.	Neutral	No mitigation measures required

## Access to Work and Training

Table 3.7 Access to Work and Training

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
8.1 Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes	An anticipated 2-year construction programme could support an average of 444 jobs each year during the construction phase. This employment could be expected to include a broad range of job-types and occupations, both on-site as well as off-site (i.e., both direct and indirect / supply chain employment). The nature of the jobs supported during the period of demolition and construction works is expected to vary. On-site employment could include highly skilled professions (such as site surveyors) alongside lower skilled supply chain jobs (such as labourers), whilst off-site activity could be expected to support employment across a wide supply chain ranging from suppliers of building materials to architects (Regeneration Statement, p.3). The proposed development also has the potential to support 391 net additional FTE jobs during operation (Regeneration Statement, p.4).	Positive	No mitigation measures required
8.2 Does the proposal provide childcare facilities?	No	N/A	N/A	N/A
8.3 Does the proposal include managed and affordable workspace for local businesses?	Yes	The Proposed Development will provide around 514 m <sup>2</sup> of affordable workspace on the ground floor which will be available to local residents, businesses and social enterprises (DAS, p.6).	Positive	No mitigation measures required.
8.4 Does the proposal include opportunities for work for local people via local procurement arrangements?	Yes	The Proposed Development will ensure that the contractor will provide employment and training for local people. The main contractor will be required to make employment and training opportunities available to local residents and the Applicant will work to ensure that those people undertaking training through this route are given a pathway to complete their training and	Positive	No mitigation measures required.

apprenticeships (Sustainable Design and Construction Statement, p.45).

Additionally, engagement with the contractors will be undertaken to ensure that local supply chains are developed as the specifications evolve (Sustainable Design and Construction Statement, p.45).

## Social Cohesion and Inclusive Design

Table 3.8 Social Cohesion and Inclusive Design

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
9.1 Does the proposal consider health inequalities by addressing local needs through community engagement?	Yes	<p>As part of the pre-planning application phase, a period of engagement was undertaken with people who live and work close to the site, which focused on sharing proposals for the new building. The pre-application public consultation included sending flyers sent to 1,263 addresses of local residents and businesses near the site, hosting a pop-up session in January 2024 and launching a dedicated project consultation website, which included the project proposals and guidance on how to leave feedback and contact the team (SCI, p.6).</p> <p>The outcomes of this process have been used to inform the design and this is detailed in the Statement of Community Involvement (Sustainable Design and Construction Statement, p.45). There is also ongoing consultation with neighbouring occupiers.</p>	Neutral	No mitigation measures required.
9.2 Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	Yes	<p>There are a number of public realm improvements occurring as a result of the proposed development. Directly in front of the café entrance there will be increased greening to St Cross street in addition to the creation of spaces for passersby to dwell and inhabit (DAS, p.64).</p>	Positive	No mitigation measures required.



		<p>The Ground Floor has been designed in a way that activates St Cross Street by providing access to the building via multiple entrances in order to reduce the 'corporate' character of the entrance. The office entrance is located to the Eastern edge of the site, with the Cafe located on the corner, defining a new anchor to the area, with a pocket park proposed on the corner as well to provide additional green space (DAS, p.60).</p>		
9.3 Does the proposal include a mix of uses and a range of community facilities?	Yes	<p>The Proposed Development will provide affordable workspace that can be accessed by local residents, businesses or social enterprises at a lower cost. Additionally, a café will be provided on the ground floor which will be open to the public, enlivening the streetscape and providing a communal space (DAS, p.64).</p>	Positive	No mitigation measures required.
9.4 Does the proposal provide opportunities for the voluntary and community sectors?	N/A	N/A.	N/A	N/A
9.5 Does the proposal take into account issues and principles of inclusive and age-friendly design?	Yes	<p>The Proposed Development has been designed with an inclusive approach. Where possible, thresholds between materials will have a visual contrast to assist people with visual disabilities (DAS, p.138). Additionally, all stairs within the building will meet Building Regulations and BS 8300 guidelines for use by people with ambulant and visual disabilities (DAS, p.140). The public realm will provide a clear and inclusive environment suitable and safe for everyone, including people with disabilities, the elderly, and children in pushchairs.</p> <p>Within the proposed development a number of inclusive facilities have been provided including accessible showers and accessible toilets throughout the building (Design Review Panel, p.59). The building is also served by a number of lifts which</p>	Positive	No mitigation measures required.

provide access to the office spaces and basement levels for those with mobility issues.

## Minimising Use of Resources

Table 3.9 Minimising Use of Resource

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
10.1 Does the proposal make best use of existing land?	Yes	The Proposed Development will increase the density of development on the existing site and provide a substantial increase in commercial office floorspace equating to 7,300 sqm net additional office space (Existing office space figure taken from Pre Development Audit, p.5).	Positive	No mitigation measures required.
10.2 Does the proposal encourage recycling (including building materials)?	Yes	<p>There will be a strategy that aims to reduce, reuse and recycle materials in alignment with the principles of circular economy throughout design, construction and operation.</p> <p>During construction, the development aims to minimise waste generation and the use of virgin materials. The Proposed Development also aims to ensure a minimum of 95% of demolition waste materials (non-hazardous), 95% of excavation waste materials and 95% construction waste materials are diverted from landfill either for reuse, recycling or recovery (Circular Economy Statement p.5). In addition the chosen contractor will be obligated, through the Contract Specification, to develop and implement a Waste Management Plan for maximising the recovery of materials and components that are able to be recycled at the end of their design life, wherever practicable (Sustainable Design and Construction Statement, p.31). The Waste Management Plan will also require the contractor to:</p>	Positive	No mitigation measures required.

		<ul style="list-style-type: none"> <li>• monitor segregate and set targets on waste generated during the works.</li> <li>• set targets for individual waste streams and minimise construction waste to a maximum of 7.5m3 or 6.5 Tonnes from construction activities.</li> </ul> <p>Additionally, during operation the Proposed Development will implement measures to support the government and GLA targets for recycling and landfill waste reduction, with the proposed development seeking to ensure that 65% of municipal waste is recycled as a minimum (Circular Economy, p.5). The following measures will be implemented to encourage and help ensure the users will be able to maximise recycling of waste:</p> <ul style="list-style-type: none"> <li>• Refuse storage is to be provided where both recyclable and non-recyclable waste can be stored.</li> <li>• External storage for waste and recycling will be provided in accordance with the waste collection service requirements.</li> <li>• The proposed refuse and servicing strategy is outlined further within a full operational waste management strategy prior to the occupation of the building.</li> </ul>		
10.3 Does the proposal incorporate sustainable design and construction techniques?	Yes	<p>The Proposed Development seeks to provide an exemplary building in terms of low carbon design and sustainability credentials (DAS, p.29). There will be a strategy that aims to reduce, reuse, and recycle materials in alignment with the principles of circular economy throughout design, construction and operation including:</p> <ul style="list-style-type: none"> <li>• Active Design <ul style="list-style-type: none"> <li>- All-electric development</li> </ul> </li> </ul>	Positive	No mitigation measures required.

- Centralised low temperature hot water (LTHW) and domestic hot water (DHW) system
- Waste-water heat recovery (WWHR)
- Highly energy efficient air handling units (AHUs) with heat recovery
- Regenerative lifts
- Passive Design
  - Compact building form
  - Highly insulated and airtight building fabric
  - Reduced thermal bridging
  - Optimised window-to-wall ratio
  - Solar control glazing
- Renewables
  - Air source heat pumps (ASHPs)
  - Roof mounted photovoltaic (PV)
- Health and Wellbeing
  - Excellent daylight levels and quality
  - Zonal thermal control
  - Enhanced air quality
- Water Efficiency
  - Low-flow water fixture, fittings and appliances
  - Drought proof planting
  - Stormwater attenuation
  - Water metering

The Proposed Development will be built for longevity through the use of materials with a longer life span and less maintenance requirements such as easy to replace cladding, office units with flexible layout configurations and future proofed heating systems, giving the office a 60-year design life (Circular Economy Statement, p. 18). The procurement of

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materials for the development will prioritise renewable or sustainable sources with low energy impact and preference will be given to the use of locally sourced materials and local suppliers where viable. The development also aims to procure materials that represent a lower risk to the health of both construction workers and occupants, such as selecting materials with zero or low volatile organic compound (VOC) levels to provide a healthy environment for residents. (Sustainable Design and Construction Statement, p.40).

The structural design has also considered the potential of future extension and possible extra loads, and the proposed raised access floor can be easily replaced and provides ease of maintenance, repair and installing MEP system. Additionally, the aluminium windows are mechanically fixed which can easily be removed or replaced without damaging the structure or creating waste (Material Efficiency Strategy, p.14).

## Climate Change

Table 3.10 Climate Change

Assessment Criteria	Relevant?	Details/Evidence	Potential health impact	Recommended mitigation or enhancement measures
11.1 Does the proposal incorporate renewable energy?	Yes	<p>The building will be built to reduce operational energy through design and aims to be a best in class environmentally sustainable and resilient. The Proposed Development will follow the four principles of the Energy Hierarchy (DAS, p.100):</p> <ul style="list-style-type: none"> <li>• Be Lean <ul style="list-style-type: none"> <li>- Reduce energy demand through high performance</li> <li>- U-values and low air permeability</li> </ul> </li> </ul>	Positive	No mitigation measures required.

		<ul style="list-style-type: none"> <li>- Where possible design to passive ventilation of internal spaces and where mechanical ventilation is needed, utilise those with heat recovery</li> <li>- Reduce the extent of overheating through design of façades to limit energy requirement to provide cooling</li> </ul> <ul style="list-style-type: none"> <li>• Be Clean           <ul style="list-style-type: none"> <li>- There is no existing heating network close to the development site to provide feasible connection</li> <li>- The development will utilise air source heat pumps and heat recovery between all uses</li> </ul> </li> <li>• Be Green           <ul style="list-style-type: none"> <li>- A feasibility study is being carried out for the development to identify the opportunities for renewable technology (including photovoltaics)</li> </ul> </li> <li>• Be Seen           <ul style="list-style-type: none"> <li>- A Design for Performance process is underway, and this will include 3 years of reporting utilising the NABERS process which aligns with the 2022 GLA Be Seen energy guidance</li> </ul> </li> </ul> <p>The proposed Development will also be compliant with the London Plan CO2 savings target of 35% overall, following the GLA Energy Assessment Guidance (DAS, p.100). Air Source Heat Pumps (ASHPs) will be used throughout the development in addition to roof mounted photovoltaic (PVs) (DAS, p.100).</p>		
11.2 Does the proposal ensure that buildings and public spaces are designed to respond to winter and	Yes	The development will be built to reduce operational energy through design through an active façade with solar shading, a passive cooling design, natural	Positive	No mitigation measures required.

summer temperatures, i.e. ventilation, shading and landscaping.

ventilation and balconies at upper levels to provide shading (Design Review Panel, p.13). Passive ventilation will be prioritised, taking into account external noise and air quality, and a range of window types allow user controlled natural ventilation to the perimeter of the office plate (DAS, p.78). The increased use of air conditioning systems is seen as undesirable within the proposed development as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect (The Sustainability Brief p.6). Therefore, in internal spaces where mechanical ventilation is needed, ventilation will be supported with heat recovery (DAS, p.100).

The facade has been designed to maximise passive solar control. The impact of this on the solar performance of the façade is mitigated by a combination of the external structural frame and vertical and horizontal louvres. The Southern Facade receives the most daylight, and the most energy from the Sun and therefore, of the three facades, it requires the greatest extent of solar shading (DAS, p.71).

The planting strategy incorporates information taken from the sun/shade and wind studies to identify the micro-climates unique to this site. This allows the development of distinct habitats and ecology to serve the buildings inhabitants and local wildlife (Landscape Strategy p.5). The plants across the building will be made up of a balance of evergreen and seasonal plants to respond to sunlight across the development.

North-facing terraces will be sheltered from the wind but will be in shade, therefore evergreen, shade tolerant plants will be utilised in north facing locations (Landscape Strategy p.3). South-facing terraces will be exposed to wind and sun and therefore plants in these locations will be draught tolerant to withstand hot or

		dry temperatures in the summer. Additionally, both the ground floor and terrace planting will require watering via automatic irrigation particularly during periods of hot and dry weather (Landscape Strategy p.13).		
11.3 Does the proposal maintain or enhance biodiversity?	Yes	<p>This scheme can achieve the target of 0.30 minimum UGF through a combination of raised planters, small shrubs and trees, climbing plants and a bio-diverse green roof. Additionally, although it is not counted in UGF calculations, the new ground floor planting outside of the site boundary would contribute 3 new trees and 58 sqm of rain garden planting (Landscape Strategy p.14).</p> <p>The proposals for the site include approximately 98 sqm of high-quality green roof accommodating wildflower, sedum and other species of significant ecological benefit. Also, 266sqm of green wall, 248 sqm of ground floor planters and 326 sqm of urban tree (Sustainable Design and Construction Statement, p. 26). The planting palette has been developed in response to the particular micro-climate created on site. Each of these areas has its own planting profile and therefore its own habitat to serve specific local wildlife. The mix of native and native-adjacent planting has been chosen to support multiple species of bats, birds and bugs throughout the year. Part of this palette includes (DAS, p.120):</p> <ul style="list-style-type: none"> <li>• North-facing, night flowering terrace planting for bats and invertebrates</li> <li>• South-facing flowering and sheltering planting for birds and invertebrates</li> <li>• Screening planting for the roof (for birds and invertebrates)</li> </ul>	Positive	No mitigation measures required.
11.4 Does the proposal incorporate sustainable urban drainage techniques?	Yes	In accordance with the London Plan policy, the surface water drainage network has been designed in coordination with the architect and landscape architect, and aims to incorporate SuDS into the fabric of the building in order to reduce and manage surface	Positive	Ensure SUDS are monitored and maintained in accordance with the maintenance schedule.



water flood risk (Sustainable Urban Drainage Strategy, p.11).

The surface water drainage systems which will route all the rainwater towards one outfall. Prior to discharge, the rainfall will be attenuated in a below ground attenuation tank at lower ground level and discharge via gravity to the outfall. The proposed attenuation tank will significantly reduce the surface water flow rate discharging into the public sewer network. A total restricted surface water flow rate of 2.0 l/s for the 1 in 100-year (+40% CC) flood event has been achieved, illustrating a 98% improvement on the existing situation.

Graded SuDS planting will be implemented on the green roof incorporating pollinator-friendly, draught tolerant plants with a balance of evergreen and seasonal plants (Landscape Strategy p.10). There will also be SuDS rain gardens surrounding the site providing additional water capture (Sustainable Urban Drainage Strategy, p.19).

Relevant maintenance agreements for the long-term operation and maintenance of all specified SuDS will be in place for the Proposed Development. This will ensure that SuDS will be regularly checked, and any blockages will be cleared in order to maintain their function (DAS, p.134).

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## 4. Conclusions and Recommendations

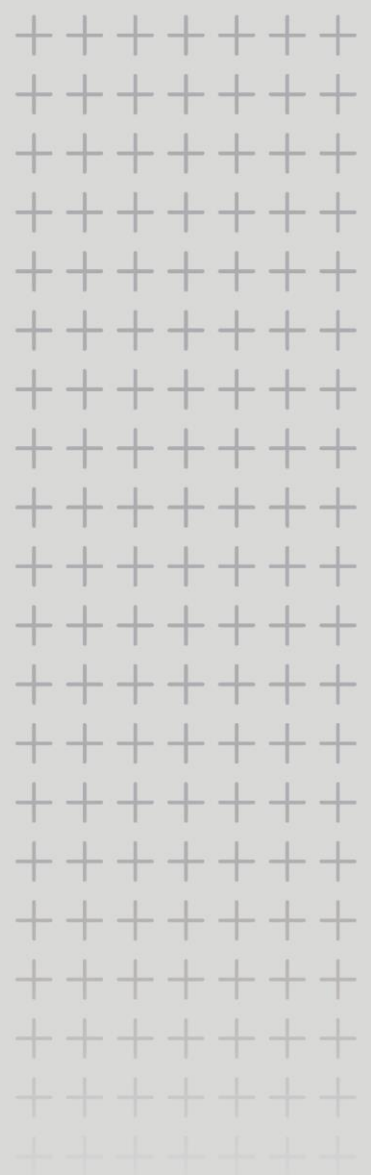
4.1 The findings of the HIA suggest that the Proposed Development will lead to a number of positive health impacts. These can be summarised as follows:

- **Access to Open Space and Nature:** the Proposed Development includes improvements to the surrounding public realm through street trees, planters and a pocket park which will benefit local people and those passing by and are designed to be accessible, safe, and welcoming. Additional green space will also be provided to tenants through the provision of green terraces.
- **Accessibility and Active Travel:** The Proposed Development will be a car-free development (except for 1 accessible parking space and deliveries), and methods of active travel will be promoted through generous cycle parking and end of trip facilities which will encourage physical activity.
- **Crime Reduction and Community Safety:** The Proposed Development promotes active and multi-use of public spaces enabling possibilities for community interaction and avoiding social exclusion. Additionally, activation of frontage and increased natural surveillance will likely lead to decreased levels of crime.
- **Access to Work and Training:** The Proposed Development will provide 8,564 sqm NIA of commercial floorspace and will support up to approximately 396 net additional FTE jobs, providing opportunities for employment, including for local residents. In addition, during the demolition and construction phase, temporary employment and training opportunities will be generated.
- **Social Cohesion:** The Proposed Development connects well to the wider area providing new spaces, including the café and pocket park located on the ground floor, in which the local community can interact.
- **Minimising Use of Resources:** A circular economy approach will be implemented across the lifecycle of the Proposed Development including carefully deconstructing the existing building and reusing as much material as possible. The Proposed Development will also incorporate sustainable design and construction techniques throughout the project lifecycle.
- **Climate Change:** The Proposed Development will incorporate renewable energy uses, adopt passive cooling measures where possible to ensure the Development can respond to winter and summer temperatures, deliver biodiversity enhancement, and incorporate sustainable urban drainage techniques.

4.2 Measures have been identified within the documents submitted with the planning application that will result in an enhanced positive impact, reduced negative or neutral health impact following implementation. These can be summarised as follows:

- **Enhancement:** Proactive engagement with the local community throughout all stages of the Application.
- **Embedded Mitigation:** Implementation of all mitigation and monitoring measures proposed in the submitted documents.

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