

# 125 Shaftesbury Avenue

## Health Impact Statement

Prepared by EKOSGEN (part of GC Insight)

Submitted on behalf of VREF Shaftesbury SCS

November 2024

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# 1 Introduction

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This Health Impact assessment (HIA) has been prepared by ekosgen, part of GC Insight, to accompany the application for planning permission submitted on behalf of VREF Shaftesbury SCS (hereafter referred to as the 'Applicant') for the proposed redevelopment of 125 Shaftesbury Avenue (hereafter referred to as 'the Site').

This Statement provides an assessment of the health impacts of the scheme in the context of the demographic and health profile of the local community and taking into account the likely receptor populations which include workers and users of the building as well as any surrounding residents. It comprises:

- An overview of the methodology (Section 2)
- A summary of the local demographic and health profiles (Section 3)
- The Health Impact Assessment (Section 4)
- Summary and Conclusions (Section 5) which identify key health impacts and any mitigation measures.

## Site Context and Proposed Development

The proposed site is located at 125 Shaftesbury Avenue, London. It lies approximately 100m south of St Giles in-the-fields Church, 250m south of Centre Point / Tottenham Court Road Station (Central and Northern lines and Crossrail) and 250m north of Leicester Square Station (Northern and Piccadilly lines).

The site is bounded by:

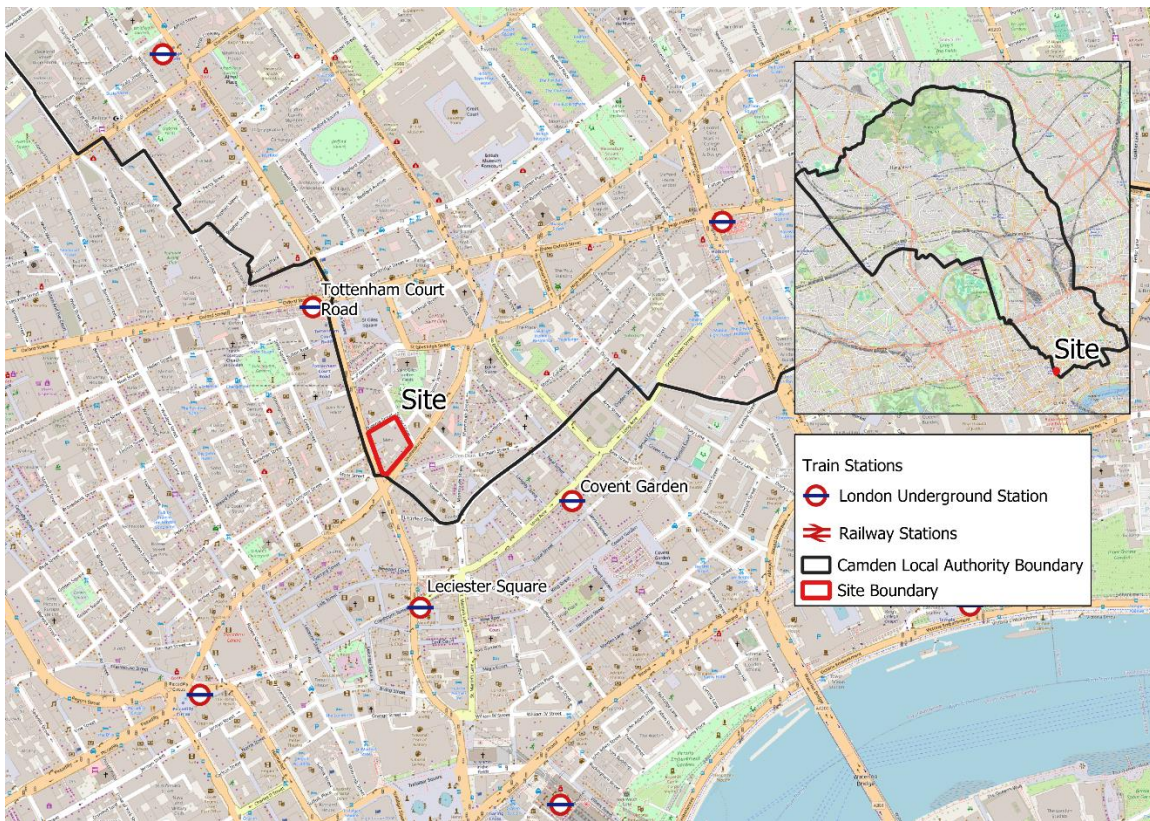
- Charing Cross Road to the south west;
- Shaftesbury Avenue to the south east;
- Stacey Street to the north east; and
- Phoenix Street to the north west.

The 0.359ha site lies within the London Borough of Camden and sits between the distinct character areas of Soho, Covent Garden, Seven Dials and Bloomsbury. It is not located within a Conservation Area, but is part of a small urban pocket surrounded by the Soho, Denmark Street and Seven Dials Conservation Areas.

The landmarks near the site include St Giles in-the fields Church, Centre Point, Seven Dials and Central St Giles. Tottenham Court, Road Station, the West End Project and Crossrail have transformed this West End location and attracted further significant investment in the area.

The proposed development is designed to contribute to the ongoing improvement and reinvention of this central London location.

**Figure 1: Site Location**



Source: ekosgen

The site is currently occupied by a basement, ground plus 10-storey building designed by Ian Fraser, John Roberts and Partners and completed in 1982. The current building provides retail units on the ground floor, with office space on floors one to ten and provides a GIA of 22,863 sq m.

The building was previously occupied by Meta (formerly known as Facebook) but is currently vacant across the office floors. Part of the office space is temporarily being used for theatre and ancillary events. On the ground floor, it hosts several retail units including Nisbets and Salsa Bar.

The previous Planning Permission was Consented in 2018 (2016/5202/P) and has since lapsed.

The proposed development comprises of the following:

- 32,435 sq. m GIA of office floorspace (Use Class E)
- 862 sq. m GIA of retail floorspace (Use Class E)

## LB Camden Requirements

A Health Impact Assessment (HIA) is required to support the planning application. This is in response to Policy C1 Health and Wellbeing of the LB Camden Local Plan which states that the council “will require major development schemes to include a Health Impact Assessment.” Major developments are regarded as developments of 10 or more homes or floorspace of 1,000sqm or more, including student housing and non-residential development.

For major developments of 10 to 99 net dwellings, or 1,000 – 9,999 sqm of additional commercial or visitor floorspace, the council states that rapid assessment should be undertaken using the NHS London Healthy Urban Development's (HUDU) Rapid Health Impact Assessment tool. However, for larger developments - which includes those with 10,000sqm or more of additional commercial space - a more comprehensive Health Impact Assessment is required.

Local Camden Planning Guidance also states that the “views of residents and affected groups, should be sought in order to understand how a proposed scheme may impact on their health and wellbeing and that HIAs should have regard to vulnerable groups and sensitive groups both as intended users of the development, and those living or accessing services in the vicinity. “

The LB Camden has been contacted to confirm our approach to completing the Health Impact Assessment (HIA) and confirmed they are comfortable with the proposed structure.

## 2 Assessment Methodology

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The World Health Organisation (WHO) Europe defines health ‘as a state of completed physical mental and social well-being and not merely the absence of disease or infirmity.’<sup>1</sup> Factors that have the most significant influence on the health of a population are called ‘determinants of health’ defined by the WHO as ‘the range of personal, social, economic, and environmental factors which determine the health status of individuals and populations.’

Determinants of health include aspects of the built environment and therefore national, regional and local policy and guidance reflects the need to ensure that built environment health determinants are considered in the determination of future developments and plans.

- At the **national level**, the National Planning Policy Framework (NPPF) promotes the creation of healthy and safe communities. Accompanying 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: 005 Reference ID:53-005-20190722).
- The **London Plan** (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*’.
- The policy states that Health Impact Assessments (HIA) should be undertaken ‘*as early as possible*’ in the plan making or design process of a development to ‘*identify opportunities for maximising potential health gains, minimising harms and addressing health inequalities*.’
- **Policy C1** of the **Adopted Camden Local Plan 2017** outlines that development must consider local issues relating to health and wellbeing at an early stage of the planning process and seek to create “*high quality, active, safe and accessible places*”. For major developments (+10 homes or +1,000 sqm of non-residential floorspace) the Council requires the submission of a Health Impact Assessment.
- **Policy SC1** of the **Draft New Camden Local Plan 2024** also indicates that developments must support healthier communities and reduce health inequalities in the borough as well as undertake a Health Impact Assessment in case of major applications (+10 homes or +1,000 sqm of non-residential floorspace). The HIA should identify the health impacts of the development and consider measures to both enhance the positive impacts and mitigate the negative impacts. In addition, the Plan outlines that applicants should consider the risk of suicide in tall buildings (+40 metres in height for buildings in the CAZ) when undertaking the HIA.
- Further to this, **LB Camden’s** planning validation requirements<sup>2</sup> for major developments of 10-99 net dwellings or 10,000 sq m of additional commercial or visitors floorspace, a rapid assessment should

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

<sup>2</sup> LB Camden, 2020, Camden’s Local Area Requirements for Planning Applications

be undertaken using **NHS London Healthy Urban Development's Rapid Health Impact Assessment Tool**.

- The **Camden Planning Guidance 'Planning for health and wellbeing'** specifies that a rapid HIA tool should address the most significant impacts of a development or those more likely to occur, allowing a focussed investigation. The guidance indicated that the HIA report must contain evidence-based recommendations and the views of residents, affected groups, and vulnerable and sensitive groups should be sought to understand the impacts of the development and taken into account in the design.

The London Healthy Urban Development Unit's (HUDU) Health Impact Assessment tool (2019)<sup>3</sup> is widely used for developments across London and identifies 11 different health determinants related to the built environment. 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. These health determinants are described in table 2.1 below together with the potential health impacts and the receptor populations likely to be impacted.

**Table 2.1 Health Determinants**

Health Determinant	Potential Health Impacts
<b>Housing quality and design</b>  Receptor Populations: (Not Applicable to the Proposed Development)	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.
<b>Access to healthcare and Social care services and other social infrastructure</b>  Receptor Populations: - Local residents	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 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.
<b>Access to Open Space and Nature</b>  Receptor Populations: - Local residents - Workers	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.  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.
<b>Air quality and noise</b>  Receptor Populations: - Local residents - Workers	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.
<b>Accessibility and active travel</b>	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

<sup>3</sup> London Healthy Urban Development Unit, 2019, Rapid Health Impact Assessment Tool, Fourth Edition



Health Determinant	Potential Health Impacts
Receptor Populations: - Workers and Visitors	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
<b>Crime reduction and community safety</b>  Receptor Populations: - Local Residents - Workers and Visitors	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. 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.
<b>Access to healthy food</b>  Receptor Populations: - Local Residents - Workers and Visitors	Access to healthy and nutritious food can improve diet and prevent chronic diseases related to obesity. People on low incomes, including young families and 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. 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.
<b>Access to work and training</b>  Receptor Populations: - Local Residents	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. Work aids recovery from physical and mental illnesses.
<b>Social cohesion and lifetime neighbourhoods</b>  Receptor Populations: - Local Residents - Workers	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. 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.
<b>Minimising the use of resources</b>  Receptor Populations: - Local Residents - Workers	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.
Climate change  Receptor Populations: - Local Residents - Workers	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. 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.

The London HUDU HIA tool has been designed to use existing evidence to assess the likely healthy impacts of development plans and proposals and recommend measures to address negative impacts and maximise benefits. The process looks at the positive and negative 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 documents such as the Design and Access Statement (DAS), Transport Assessment (TA), Energy and Sustainability Assessments and community engagement responses as well as technical assessments of impact topics set out within the Environmental Statement (ES). These documents provide the detailed information in terms of the methods of assessing impacts for each of the specialist areas. Where appropriate, these documents have been referenced and supplemented with information from discussions with the appropriate technical leads for each of the potential health impacts.

## Receptors

The receptors that could experience likely health effects include the general population and vulnerable groups and are described below:

Receptor Group	Receptor Population
General Population	Existing and future residents
	Existing and future workers
	Visitors to the Proposed Development
Vulnerable Population	Children and young people (aged under 18)
	Older people (aged over 65)
	Low-income groups and unemployed people
	Ethnic minority groups
	People with disability and long-term illness (including mental health issues, dementia, autism and epilepsy)

**Section 2** of this report establishes the prevalence of the vulnerable population groups in the local area as well as the demographic and health profile of the receptor groups.

## Determining the Type of Effect

The HIA covers a wider 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 healthy 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 and taking into account the baseline health conditions identified in Section 2.

**Table 1.2 HIA Impact Categories**

Impact	Description
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

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

Actions have been identified to mitigate any negative impact on health and opportunities to enhance health benefits where relevant have also been identified. For the most part, these measures already form part of the Proposed Development (embedded) or have been identified within other supporting planning submissions documents as mitigation measures and the assessment has considered these impacts as such. Where mitigation or enhancement measures are identified that are additional, this is noted.

## 3 Local Context

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The geographical extent of the impacts assessed within this HIA is dependent upon the type of effect and the receptors (residents, visitors, workers etc). Impact areas and associated baseline conditions are defined within each of the relevant topics and documents that this HIA draws upon and will vary depending on the health determinant and receptor. This section therefore focuses on the area surrounding the Site in order to provide a demographic and health profile that is considered likely to be representative of the receptor groups.

The Site is situated in the wards of Holborn and Covent Garden in LB Camden. Combined with the Bloomsbury ward (also in LB Camden) this area is considered representative of the 'local community' and receptor populations. The Local Impact Area (LIA) is therefore defined as the Holborn and Covent Garden and Bloomsbury Wards.

The demographic and health profile are assessed at the LIA level together with the Borough's as a whole and benchmarked with London and National (England) data where relevant.

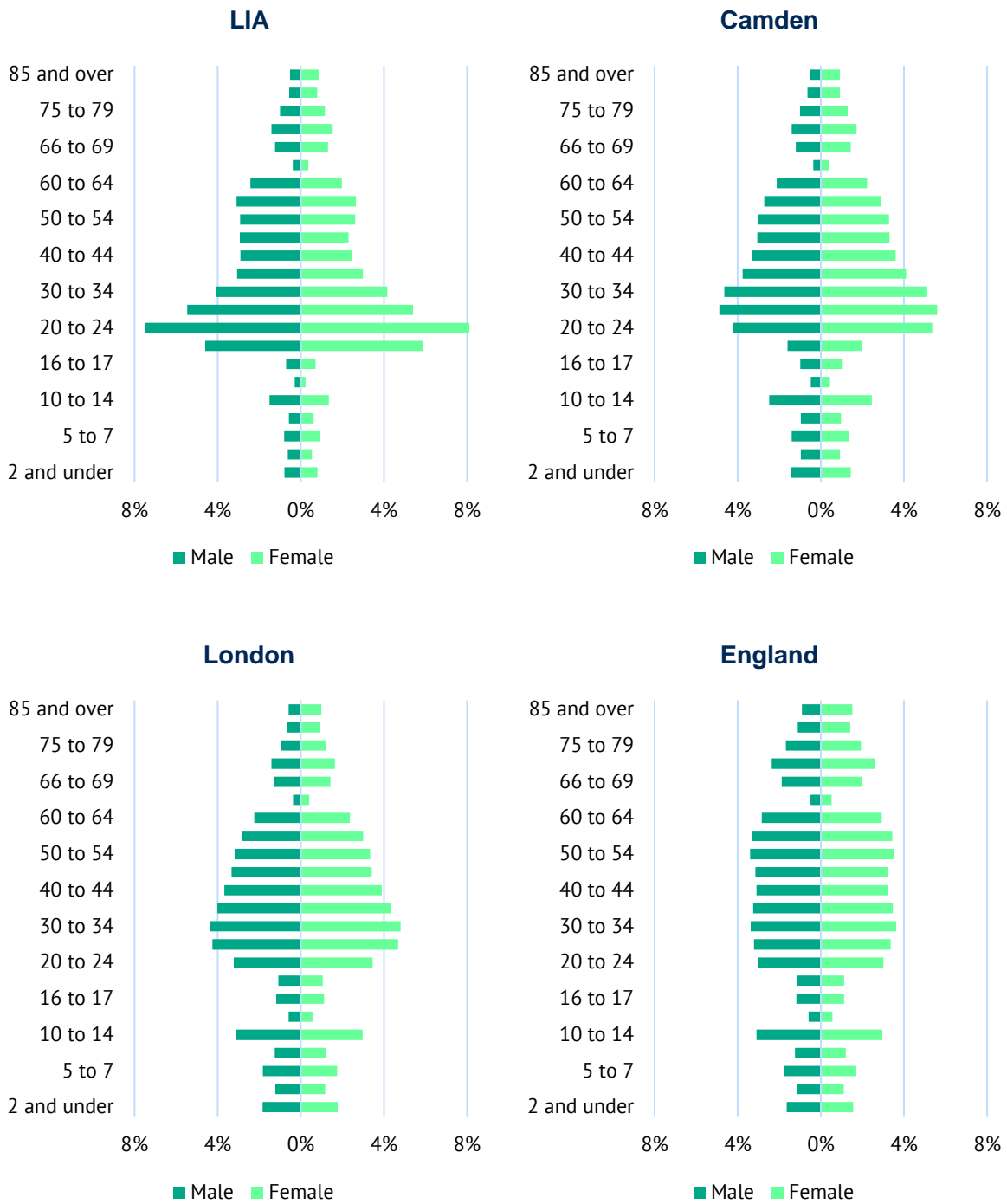
### Demographic Baseline

This section identifies population groups affected by the proposed development.

The population profile for the LIA (Bloomsbury and Holborn and Covent Garden wards as a combined average), Camden, London and England is shown in Figure 3.1 based on data from the 2021 Census. The total population of the LIA was around 21,500 in 2021, accounting for 10% of LB Camden's total population (210,000).

Around 10% of the LIA's population are young people (under 18), this is a higher proportion of the total population than LB Camden and London (17% and 22%) and nationally (21%). 11% of the LIA's total population are aged 65 and over, a similar proportion as Camden and London (both 12%), and lower than nationally (18%).

Figure 3.1 Population Pyramids for the LIA and Comparator Areas



Source: Census 2021

Several groups are identified in the recent Institute for Environmental Management and Assessment (IEMA) Guidance<sup>4</sup> as being particularly vulnerable to adverse health effects. These include:

<sup>4</sup> IEMA, Effective Scoping of Human Health in Environmental Impact Assessment, November 2022

- **Young people:** children and adolescents are a vulnerable group due to their increased sensitivity to the physical environment. During the physical and mental development of the human body, environmental factors such as air pollution, noise and stress have been shown to be associated with relatively worse health outcomes. Barriers to physical activity created by the removal of open space or heavy traffic have greater impacts on young people due to their greater reliance on outdoor and active spaces.
- **Older people:** older people are at risk of social exclusion, can find it difficult to access health and social services as well as shops and community facilities. Negative health effects from social exclusion can be amplified as a result of a fear of crime. Older people are more vulnerable to negative health effects associated with changes in accessibility, air quality and noise.
- **People with disability and long-term illness (including mental impairments):** people with disabilities and mental health issues can struggle to gain and maintain employment; and are more vulnerable to a reduction in physical activity due to changes in accessibility. They may also struggle to access community facilities which might otherwise provide health benefits.
- **Low-income groups:** significant evidence exists that social grade and income are strongly associated with health outcomes. Often the poorest people experience worse health outcomes as they are exposed to poor quality outdoor environments and do not face the same access to nutrition and activity.
- **Ethnic minority groups:** there is evidence that the poorer socio-economic and spatial position of ethnic minorities is the main factor driving health inequalities for ethnic minorities.

**Table 3.1** summarises the prevalence of vulnerable groups included in this assessment for the LIA as well as for relevant comparator areas. The following colour-scheme is applied:

- **Red:** the vulnerable population has a larger presence than the London averages;
- **Amber:** the vulnerable population has a similar presence than London; and
- **Green:** the vulnerable population has a smaller presence than London.

**Table 3.1 Vulnerable Group Population Summary**

	Young people (aged under 18)	Older people (aged over 65)	Long-term illness or disability	Low income groups	Ethnic minority groups
Local Impact Area	10%	11%	23%	14%	46%
LB Camden	17%	12%	21%	13%	40%
London	22%	12%	18%	14%	46%
England	21%	18%	24%	16%	19%

*Source: Census 2021; ONS, 2017, Households in poverty estimates for middle layer super output areas in England and Wales (financial year ending 2014).*

This indicates that the LIA has a lower prevalence of young people (aged 18 and under) than London as well as a similar proportion of older people (aged 65 and over) and low income groups, below the national average. Ethnic minority groups and people with long-term illness or disability are the only groups with a relatively high prevalence in the HIA compared to England and London, respectively.

## Local Health Profile

This section sets out the local health profile for the LIA and sets this within the context of comparator areas which include LB Camden, London and England. Not all health indicators are available at the ward level.

**Table 3.2** summarises the baseline position of key health indicators. It draws on publicly available data sources including the 2021 Census, Public Health England ‘Fingertips’ and ONS Subnational Indicators.

The following colour-scheme is applied:

- **Red:** the indicator performs worse than the London average;
- **Amber:** the indicator is the same or close to the London average; and
- **Green:** the indicator performs better than the London average.

Relative to regional and national levels, the LIA presents:

- A **higher prevalence of obesity** in 4-5 years old children alongside a significantly high density of fast food outlets. According to Public Health England, 1 out of 3 fast food outlets in Camden are located in the LIA. Increasing levels of children overweight and obesity has been identified as a problem in the borough alongside high concentrations of hot food takeaways in areas close to schools and with high rates of children experiencing weight issues<sup>5</sup>.
- A **higher rate of unemployment and child poverty**. Over 1,000 children live in relative low income families in the LIA, with Bloomsbury showing particularly high child poverty rates (67%, the highest rate in the borough). Unemployment rates are also higher in Bloomsbury (12.5%) and amongst ethnic minority groups (14.5%) and people with a disability (15.9%).
- A **lower proportion of people travelling to work by public transport**. Despite the excellent access to public transportation in the LIA<sup>6</sup>, residents have a stronger preference to use active travel modes to work (walk/cycling). This could be explained by the short distances to employment centres in the LIA, with 18% of residents travelling less than 2km to work, above local and regional levels (9% and 8%, respectively). This also correlates with a higher proportion of households with no cars or vans in the LIA.
- At the local authority level, **higher rates of teenage pregnancy, alcohol-related hospital admissions and deaths and serious injuries in roads**.

**Table 3.2 Local Health Profile**

Health Indicator	Source	LIA	Camden	London	England
% of total population 0-18	ONS Census 2021	10.5%	17.4%	21.6%	20.8%
% of total population 65+	ONS Census 2021	11.1%	11.8%	11.9%	18.4%
Life expectancy men	PHE Fingertips 2016 – 2020	83.3	82.8	80.8	79.5

<sup>5</sup> Draft Camden Local Plan 2024

<sup>6</sup> Transport for London, 2015, Public Transport Accessibility Levels

Health Indicator	Source	LIA	Camden	London	England
Life expectancy women	<i>PHE Fingertips 2016 - 2020</i>	89.9	87.4	84.6	83.2
% children classified as obese (4-5 years old)	<i>PHE Fingertips 2021/22 - 23/24</i>	11.1*	8.6	10.0	9.6
% children classified as obese (10-11 years old)	<i>PHE Fingertips 2021/22 - 23/24</i>	21.3	23.0	24.9	22.7
% of physically active adults	<i>PHE Fingertips 2022/2023</i>	no data	73.3	66.3	67.1
Obesity prevalence in adults (% aged 18+)	<i>ONS Subnational Indicators dataset 11/2021 - 11/2022</i>	no data	18.0	19.7	25.9
% population travelling to work by active travel modes	<i>ONS Census 2021</i>	22.7%	14.2%	9.4%	9.7%
Density of fast food outlets (per 100,000 population)	<i>PHE 2018: Fast food outlets: density by local authority in England</i>	504.6	174.2	97.6	96.9
Rate of under 18 alcohol specific admissions (per 100,000 population)	<i>PHE Fingertips 2020/21 - 22/23</i>	no data	40.7	14.9	26.0
Rate of teenage pregnancy (under 18 conception rate per 1,000 population)	<i>PHE Fingertips 2021</i>	no data	10.3	9.5	13.1
Adult hospital admissions for alcohol related conditions (age standardised rate per 100,000 population)	<i>PHE Fingertips 2022/23</i>	no data	435	420	475
Deaths from respiratory diseases (standardised mortality ratio)	<i>PHE Fingertips 2016-2020</i>	71.5	68.2	88.3	100.0
Smoking prevalence in adults (% self-reported smokers aged 18+)	<i>ONS Subnational Indicators dataset 2022</i>	no data	9.1	11.7	12.7
% in employment (% economically active)	<i>ONS Census 2021</i>	89.2%	91.9%	92.7%	94.3%
Unemployment (% economically active)	<i>ONS Census 2021</i>	10.8%	8.1%	7.3%	5.7%



Health Indicator	Source	LIA	Camden	London	England
Long term unemployment (%)	<i>PHE Fingertips 2021/22</i>	2.0	2.1	2.1	1.9
Child poverty/children in relative low income households (%)	<i>DWP Children in low income families: local area statistics 2015 to 2023</i>	52.1%	19.0%	15.8%	19.9%
Killed and seriously injured on roads (per 1 billion vehicle miles travelled)	<i>PHE Fingertips 2023</i>	no data	398.2	187.5	91.9
Levels of car ownership (% of households with no car or van)	<i>ONS Census 2021</i>	80.0%	63.6%	42.0%	23.5%
% population travelling to work by public transport	<i>ONS Census 2021</i>	17.2%	19.3%	24.1%	8.2%

\* Data only available for Holborn and Covent Garden

The **English Indices of Multiple Deprivation (IMD)** (2019) provide insight into levels of deprivation at a neighbourhood level. These indices provide baseline evidence on the following health determinants that are considered to be relevant to this assessment:

- **Employment** (proportion of the working age population in an area involuntarily excluded from the labour market).
- **Income** (population experiencing deprivation relating to low income).
- **Health Deprivation and Disability** (risk of premature death and the impairment of quality of life through poor physical or mental health).
- **Crime** (risk of personal and material victimisation at local level).
- **Living Environment** (quality of both the indoor and outdoor local environment).

The indices relatively rank each small area (Lower Layer Super Output Area – LSOA) in England from most deprived to least deprived. **Table 3.3** summarises the performance for the LIA by considering the proportion of LSOAs that rank in the top 30% least and most deprived nationally. This shows that the residents of the LIA experience relatively high levels of living environment related deprivation.

The LSOA where the Site is located in (Camden O28D) ranks in the 1<sup>st</sup> decile for living environment, and 2<sup>nd</sup> for crime, showing that the Site performs within the 10% and 20% worst local areas nationally for these domains, respectively.

**Table 3.3 Domains of Deprivation**

IMD Domain	Proportion of LSOAs that rank in the top 30% most deprived	Proportion of LSOAs that rank in the top 30% least deprived
Employment	13%	40%
Income	20%	27%
Health Deprivation and Disability	0%	67%
Crime	20%	20%
Living Environment	100%	0%

Source: English Indices of Multiple Deprivation, 2019

The **Access to Healthy Assets and Hazards** Index (AHAH) captures metrics relating to key health determinants down to a LSOA geography<sup>7</sup>. Four domains comprise the index which are combined to give an overall AHAH rating for each LSOA from 0 (best performing) to 100 (worst performing).

According to the index, the following bullets summarise the performance of the LIA:

- Retail environment (access to fast food outlets, pubs, tobacconists, gambling outlets): on average, LSOAs in the LIA are in the 10<sup>th</sup> decile nationally (i.e. within the 10% worst performing nationally).
- Health services (access to GPs, hospitals, pharmacies, dentists, leisure services): on average, LSOAs in the LIA are in the 1<sup>st</sup> decile nationally (i.e. within the 10% best performing nationally).
- Physical environment (Blue Space, Green Space – Passive): on average, LSOAs in the LIA are in the 10<sup>th</sup> decile nationally (i.e. within the 10% worst performing nationally).
- Air quality (Nitrogen Dioxide, Particulate Matter 10, Sulphur Dioxide): on average, LSOAs in the LIA are in the 10<sup>th</sup> decile nationally (i.e. within the 10% worst performing nationally).

The overall AHAH index score for the Site's LSOA is within the 10<sup>th</sup> decile showing that the Site performs within the 10% worst local areas nationally for access to healthy assets and hazards.

<sup>7</sup> Consumer Data Research Centre, 2022, Access to Healthy Assets and Hazards

## 4 Assessment

This section sets out the HUDU Rapid HIA Matrix which has been designed to assess the likely health impacts of development plans and proposals.

**Table 4.1 Access to Health and Social Care Services and Other Social Infrastructure**

Assessment Criteria	Relevant	Details/Evidence	Potential Health Impact	Recommended Mitigation or Enhancement Measures
Does the proposal retain or re-provide existing social infrastructure?	No	The Proposed Development does not retain or re-provide social infrastructure.	N/A	N/A
Does the proposal assess the impact on health and social care services and has the local NHS been contacted?	No	The Proposed Development does not include residential accommodation and therefore will not generate significant demand for health and social care facilities.	N/A	N/A
Does the proposal include provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	No	The Proposed Development does not include provision or replacement of a healthcare facility.	N/A	N/A
Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. Schools and community facilities?	No	The Proposed Development does not include residential accommodation and therefore will not generate significant demand for schools and other community facilities.	N/A	N/A
Does the proposal explore opportunities for shared community use and colocation of services?	No	The Proposed Development does not include provision of community facilities/services.	N/A	N/A

**Table 4.2 Access to Open Space and Nature**

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact	Recommended Mitigation or Enhancement Actions
Does the proposal retain and enhance existing open and natural spaces?	Yes	The existing building provides two key areas of public realm located on Caxton Walk and at the junction of Phoenix Street and Stacey Street. These spaces are currently underused and are of poor quality and accessibility. They also attract anti-social behaviour. The proposal will retain and enhance these public spaces and create two new public spaces –one on Caxton Walk and the other on Stacey Street.	Positive	No further mitigation required.
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	Yes	The new and improved open and natural space will be provided in an area of poor quality public space. As outlined in the Design and Access Statement, the space lacks greenery, has poor accessibility and attracts anti-social behaviour. The Proposed Development will provide a large amount of greenery in balconies, terraces or loggias at every level. This will be visible from the street and from inside of the building. The new public spaces on Caxton Walk and Stacey street also include planting.  This will improve the physical environment in the LIA which, according to the Access to Healthy Assets and Hazards Index, ranks within the 10% worst performing nationally in terms of blue and green space. Residents of the LIA also experience relatively high levels of living environment related deprivation according to the Index of Multiple Deprivation 2019.	Positive	No further mitigation required.
Does the Proposal provide a range of play space for children and young people?	No	The Proposed Development does not include residential accommodation and therefore will not generate significant demand for play spaces.	N/A	N/A
Does the Proposal Provide links between open and natural spaces and the public realm?	Yes	As outlined in the Design and Access Statement, the planting scheme complements the existing planting within the Phoenix Garden and biodiversity initiatives such as the Bloomsbury Biodiversity Corridor and the West End Project. This will contribute to create a network of green spaces and a visual connection to the surrounding area.  The greenery cascading is also expected to invite pedestrian into the Caxton Walk passage which links to the public realm located next to the Phoenix Garden.	Positive	No further mitigation required.

Are the open and natural spaces welcoming and safe and accessible for all?	Yes	As outlined in the Design and Access Statement, the proposed development will provide accessible and safer outdoor spaces that prioritise pedestrians and their safety. Accessible terraces for future commercial tenants will be provided at each level. These are designed to be wide enough for wheelchair users to manoeuvre comfortably. A fall prevention strategy has also been considered for the wellbeing of terrace users and to ensure safe maintenance working.	Positive	No further mitigation required.
Does the proposal set out how new space will be managed and maintained?	Yes	The new space will be managed and maintained through a management company.  The Design and Access Statement outlines approaches for greening maintenance and grass replacement, including direct access from balconies and terraces and ensuring safe working.	Positive	No further mitigation required.

**Table 4.3 Air Quality, Noise and Neighbourhood Amenity**

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact	Recommended Mitigation or Enhancement Actions
Does the Proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes	The Air Quality Assessment specifies mitigation measures to be implemented during the demolition and construction phases. With these measures, impacts from dust emissions during construction are not predicted to be significant.  According to the Construction/Demolition Management Plan, the noise created during the construction works will be within the allowable times and noise restrictions. Noise reduction methods will be utilised to minimise disruption, including best practice guidance and noise monitoring to ensure the levels are not exceeded.	Neutral	Implement mitigation measures as set out in the Air Quality Assessment and Construction/Demolition Management Plan.

<p>Does the proposal minimise air pollution caused by traffic and energy facilities?</p>	<p>Yes</p>	<p>The Air Quality Assessment identifies that the impacts on NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> exposure as a result of changes in traffic flow during the peak construction year (2025) are negligible for all existing receptors.</p> <p>As the Proposed Development will be car free during its operation and does not involve installing heat source emissions, it is considered to be air quality neutral in relation to building and transport emissions.</p>	<p>Neutral</p>	<p>Implement mitigation measures as set out in the Air Quality Assessment.</p>
<p>Does the Proposal minimise noise pollution cause by traffic and commercial uses?</p>	<p>Yes</p>	<p>The design considers attenuation measures, including an acoustic package to reduce atmospheric noise emissions from the Air Source Heat Pump (ASHP) units that will be installed in the roof plant area. In addition, an acoustically louvered screen shall be installed around the roof plant area to control noise emissions from additional plant items. The Noise Impact Assessment indicates that this will allow the Proposed Development to achieve LB of Camden's atmospheric plant noise emission requirements.</p> <p>Control measures will be implemented to minimise the noise arising from commercial operations in the retail units, including acoustic attenuation measures (e.g. sound insulation and self-closing hours) and good management practices (e.g. control of music/loudspeaker systems and delivery hour restrictions). The Noise Impact Assessment indicates that with these measures the noise impact associated with the retail uses would be negligible for nearby noise sensitive receptors.</p>	<p>Neutral</p>	<p>Implement mitigation measures and best practice management practices highlighted in the Noise Impact Assessment.</p>

**Table 4.4 Accessibility and Active Travel**

Assessment Criteria	Relevant?	Details/ Evidence	Potential Health Impact	Recommended Mitigations or Enhancement Actions
Does the proposal address the Healthy Streets indicators?	Yes	According to the Transport Assessment, the proposed development aligns with the Transport for London (TfL) Healthy Streets Guidance. The development is well located in Central London and close to London Underground stations and bus stops as well as signed cycle routes and high-quality pedestrian infrastructure. The proposed development will also remove on-site car parking, reducing car dependency and encouraging active and sustainable travel.	Positive	No further mitigation required.
Does the proposal prioritise and encourage walking, for example through the use of shared spaces?	Yes	<p>According to the Transport Assessment, the proposal will generate additional pedestrian trips and encourage walking through the following:</p> <ul style="list-style-type: none"> <li>• Closing of Phoenix Street to vehicular traffic, remaining open for cyclists and pedestrians</li> <li>• A new and illuminated pedestrian route through the Site, connecting New Compton Street and Stacey Street to Charing Cross Road</li> <li>• Enhancing the public realm around the Site (e.g. new planting, seating, lighting), creating an attractive and high-quality pedestrian environment</li> </ul> <p>These improvements will benefit residents and workers and support a potential increase in physical activity rates. According to the Census 2021, a high proportion of residents in the LIA walk to work (19%, c.1,800 residents), while data from the Active Lives Adult Survey reveals that 18% of Camden adult residents do less than 30 minutes of physical activity per week.</p>	Positive	No further mitigation required.

<p>Does the proposal prioritise and encourage cycling, for example by providing secure cycle parking, showers and cycle lanes?</p>	<p>Yes</p>	<p>According to the Transport Assessment, the Site benefits from excellent cycle connections within the surrounding area. The proposed development will encourage employees and visitors travel by bike through the following:</p> <ul style="list-style-type: none"> <li>• Provision of at least 486 short and long stay cycle parking spaces (430 for office use), over three times the current provision (140)</li> <li>• Provision of cycle parking for larger and adapted cycles (22)</li> <li>• Provision of shower, lockers and changing facilities for cyclists in the basement</li> <li>• Removal of the existing 21 space basement car park</li> </ul> <p>This will generate additional cycle trips and contribute to a higher proportion of residents in the LIA cycling to work (currently 4% according to the Census 2021).</p>	<p>Positive</p>	<p>No further mitigation required.</p>
<p>Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?</p>	<p>Yes</p>	<p>According to the Transport Assessment, the development will provide a new pedestrian route connecting Stacey Street and Charing Cross Road as well as New Compton Street and Old Compton Street, benefiting pedestrian movement in the area.</p> <p>Pedestrian facilities will provide safe access on foot to main pedestrian desire lines which include local bus stops and key London Underground and National Rail Stations such as Leicester Square, Tottenham Court Road, Holborn, Piccadilly Circus and Charing Cross.</p> <p>The Site is in close proximity to Cycleway 10, providing excellent cycle connection to other major hubs across London.</p>	<p>Positive</p>	<p>No further mitigation required.</p>



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<p>Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?</p>	<p>Yes</p>	<p>The car-free nature of the proposed development and the loss of 21 car parking spaces will result in fewer cars on the road and potentially lower accident rates.</p> <p>According to the Transport Assessment, the proposed development will only generate a small number of additional vehicular trips by servicing vehicles which would not have a significant impact on the highway network. Servicing vehicle access to the Site is via Stacey Street, the route with the lowest level of car traffic surrounding the Site. The proposed development will extend the loading bay in the ground floor to facilitate off-street delivery and will be carefully designed with regards to safety.</p>	<p>Positive</p>	<p>No further mitigation required.</p>
<p>Is the proposal well connected to public transport, local services and facilities?</p>	<p>Yes</p>	<p>The Transport Assessment indicates that the Site is located in an area with the highest PTAL score (6B), demonstrating excellent accessibility to public transport. The Site is served by numerous high-frequency bus routes and four London Underground stations, with the closest 300m from the Site at Tottenham Court Toad, and the National Rail station at Charing Cross.</p> <p>The Site is also well located to provide access to key local facilities which will meet day-to-day needs of occupiers. Amenities and facilities within 800m walking distance of the Site include food stores and retail shops; green spaces such as Phoenix Gardens and Soho Square Gardens; leisure and gym facilities; and hot food outlets.</p>	<p>Positive</p>	<p>No further mitigation required.</p>

<p>Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plan measures?</p>	<p>Yes</p>	<p>The Proposed Development is car-free and proposes to remove the 21 car parking spaces in the basement.</p> <p>The Site is located within the controlled parking zone CA-C operating from 08:30-18:30 Monday to Saturday, while controls on Resident Bays are in operation at all times.</p> <p>The following initiatives included in the Framework Travel Plan aim to ensure that employees have access to the most sustainable option for travel:</p> <ul style="list-style-type: none"> <li>• Provision of travel information to all staff, including information on local car clubs</li> <li>• Encouraging walks through Walking Works Staff Challenges and Walking User Groups</li> <li>• Encouraging cycling through cycle parking facilities, Cycle to Work Scheme, and Bicycle User Groups</li> <li>• Encouraging public transport by season ticket loans provision and encouraging use of Travel Apps</li> <li>• Discouraging car use, removing all existing basement car park spaces and encouraging flexible working from home</li> <li>• Reducing the impact of delivery and servicing, encouraging green vehicles and consolidation for common or repeat deliveries</li> </ul> <p>This will contribute to reduce the dependency on car travelling to work in Camden. According to the Census 2021, although only 7% of residents in Camden travel to work by car or van, the borough attracts a high number of commuters from other localities such as Barnet and Brent which have a significantly high proportion of residents using a car to travel to work (27% and 24%, respectively).</p>	<p>Positive</p>	<p>No further mitigation required.</p>
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<p>Does the proposal allow people with mobility problems or a disability to access buildings and places?</p>	<p>Yes</p>	<p>According to the Design and Access Statement, entrances to the building include weather protection, step-free access, adequate width, clear signage, and automated doors with accessible controls. These features help ensure that individuals with mobility challenges can enter the building safely and comfortably.</p> <p>The Proposed Development will also provide 22 non-standard / large / adapted cycles (5% of total cycle parking provision, in line with the London Plan 2021 and London Cycle Design Standards (LCDS) according to the Transport Assessment). Access to the basement cycle store includes a LCDS compliant cycle lift for larger and adapted cycles.</p> <p>One on-street disabled parking space will be negotiated as part of the Section 106 agreement.</p>	<p>Positive</p>	<p>Disabled parking space provision to be negotiated as part of a S106 agreement.</p>
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**Table 4.5 Crime Reduction and Community Safety**

Assessment Criteria	Relevant?	Details/ Evidence	Potential Health Impacts	Recommended Mitigation or Enhancement Actions
<p>Does the Proposal incorporate elements to help design out crime?</p>	<p>Yes</p>	<p>The Design and Access Statement includes a strategy for crime prevention in response to security risks identified in the development and engagement with key stakeholders.</p> <p>The strategy considers the following elements:</p> <ul style="list-style-type: none"> <li>• A combination of active and passive surveillance</li> <li>• Installation of a network of CCTV cameras which will be monitored 24/7</li> <li>• Permanent on-site security presence</li> <li>• Lighting throughout the evening</li> <li>• Enforcement of security zones through electronic access control, mechanical locks and clear delineation of areas</li> </ul>	<p>Positive</p>	<p>No further mitigation required.</p>

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<p>Does the proposal incorporate design and techniques to help people feel secure and avoid creating 'gated communities' ?</p>	<p>Yes</p>	<p>The current public realm is of poor quality, underused, and attracts anti-social behaviour, leading to perceptions of the area being unsafe and unwelcoming. The Proposed Development responds to these concerns by creating a well-designed public realm and activating the ground floor uses, offering a safe and inviting space for building users, residents and visitors to the area and promoting social interactions.</p> <p>The elements listed in the previous assessment criteria (design out crime measures) provide extra-security, allowing users of the development to feel safe.</p>	<p>Positive</p>	<p>No further mitigation required.</p>
<p>Does the proposal include attractive multi-use public spaces and buildings?</p>	<p>Yes</p>	<p>The Proposed Development features a high-quality mixed-use scheme that includes office and retail spaces as well as an improved public realm (see Table 4.2) with better surveillance and maintenance (as above).</p>	<p>Positive</p>	<p>No further mitigation required.</p>

<p>Has engagement and consultation been carried out with the local community and voluntary sector?</p>	<p>Yes</p>	<p>The following targeted public consultations activities were carried out to present the proposed development to local residents and stakeholders:</p> <ul style="list-style-type: none"> <li>• Letters sent to political and community stakeholders</li> <li>• Launch of a dedicated consultation website <a href="http://www.125shaftesburyavenue-consultation.co.uk">www.125shaftesburyavenue-consultation.co.uk</a> with information of the proposals, receiving 155 unique visitors</li> <li>• Distribution of flyers to 1,526 addresses in the area surrounding the Site</li> <li>• Door-knocking session of 84 neighbouring homes</li> <li>• Two public drop-in events at the Site providing detailed information on the proposals for 10 attendees in total</li> </ul> <p>Meetings to discuss the proposals and get feedback were also held with key stakeholders including The Phoenix Garden representatives, Yoo Capital (owners of the Saville Theatre), Central District Alliance and Phoenix Theatre.</p> <p>The voluntary sector has been included in public consultations and engagement activities, including Dragon Hall Trust, The Phoenix Garden, and Raise your Hands (currently using the space for meanwhile uses).</p> <p>According to the Statement of Community Involvement, the feedback has been generally positive and participants typically agreed with the need to revive the ground floor given concerns of anti-social behaviour around Stacey Street and Phoenix Street.</p>	<p>Positive</p>	<p>No further mitigation required.</p>
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**Table 4.6 Access to Healthy Food**

Assessment Criteria	Relevant?	Details/ Evidence	Potential Health Impact	Recommended Mitigation or Enhancement Actions
<p>Does the proposal facilitate the supply of local food i.e. allotments, community farms and farmers' markets?</p>	<p>No</p>	<p>The Proposed Development will not facilitate the supply of local food.</p>	<p>N/A</p>	<p>N/A</p>

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Is there a range of retail uses, including food stores and smaller affordable shops for social enterprise?	Yes	The Proposed Development comprises 862 sq m (GIA) of retail floorspace (Use Class E), allowing for flexible retail uses such as food stores, cafes and restaurants. It does not include provision of smaller affordable shops for social enterprise.	Neutral	No further mitigation required
Does the proposal avoid contributing towards an overconcentration of hot food takeaways in the local area?	Yes	The Proposed Development only comprises Use Class E and therefore does not include floorspace that could be used for hot food takeaway purposes.	Neutral	No further mitigation required

**Table 4.7 Access to Work and Training**

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impacts	Recommended Mitigation or Enhancement Actions
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes	<p>According to the Regeneration Statement for the Proposed Development, the scheme will provide office and retail floorspace generating 2,165 FTE additional permanent jobs on-site, providing opportunities for employment and training, including for local residents.</p> <p>During the construction phase, temporary employment opportunities will be generated. It is estimated that the Proposed Development will support 239 jobs per annum (160 direct construction jobs and 80 indirect jobs) and seek to recruit 47 apprenticeships. The Applicant intends to engage an experienced primary contractor with considerable expertise in securing local employment and providing apprenticeships.</p> <p>An Employment and Skills Strategy has been prepared to support this planning application and this sets out in detail the measures which the Applicant will take to provide access to local employment and training opportunities.</p> <p>These employment opportunities will contribute to improve the relatively high unemployment rates in the LIA, particularly in Bloomsbury (12.5%).</p>	Positive	Implement measures set out in the Employment and Skills Strategy
Does the proposal provide childcare facilities?	Yes	The Proposed Development does not include residential provision and therefore is unlikely to generate significant demand for childcare facilities. The building design is flexible and if required, can be adapted by the tenant to accommodate nursery provision.	Neutral	No further mitigation required
Does the proposal include managed and affordable workspace for local businesses ?	Yes	The Proposed Development will offer 464 sqm (GIA) of affordable workspace at the ground floor in Stacey Street and has confirmed they will discount the space by 40%, providing modern and high quality premises for local businesses.	Positive	No further mitigation required.

Does the proposal include opportunities for work for local people via local procurement arrangements?	Yes	<p>According to the Employment and Skills Strategy for the Proposed Development, the Applicant aims for 10% of the total procurement value during the construction phase to be awarded within the Camden supply-chain or Central Forward area. This will be achieved by promoting opportunities within the local supply chain and working with the council to identify potential local organisations to be considered for tender.</p> <p>This includes signing up to the Camden Local Procurement Code and delivering at least one supplier capacity building workshop / Meet the Buyer event to support Camden's SMEs to tender for construction contracts in relation to the development.</p>	Positive	Implement measures set out in the Employment and Skills Strategy
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**Table 4.8 Social Cohesion and Inclusive Design**

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact	Recommended Mitigation or Enhancement Actions
Does the proposal consider health inequalities by addressing local needs through community engagement?	Yes	<p>Consultation and engagement activities were carried out to present the proposed development to local residents and get feedback and concerns about the development.</p> <p>The only concerns identified in the Statement of Community Involvement related to health issues include the need to address anti-social behaviour as well as the impacts of the Proposed Development on daylight and sunlight on neighbouring properties. The Proposed Development has responded to these concerns through design of public realm, security measures and through building design.</p> <p>The Applicant is committed to continued engagement with stakeholders subject to planning permission.</p>	Neutral	No further mitigation required.



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<p>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?</p>	<p>Yes</p>	<p>The proposed development aims to promote movement through and around the Site and encourage interactions between users, local residents and passersby through the following measures:</p> <ul style="list-style-type: none"> <li>• A new pedestrian route at the heart of the Site to improve permeability and safety</li> <li>• Enhanced public realm on both Caxton Walk and at the junction of Stacey Street and Phoenix Street, improving permeability and providing a positive point of arrival and opportunities for seating and social interaction</li> <li>• Large terraces at the upper levels and a new atrium, offering space for users to socialise</li> </ul>	<p>Positive</p>	<p>No further mitigation required.</p>
<p>Does the proposal include a mix of uses and a range of community facilities?</p>	<p>Yes</p>	<p>The Proposed Development does not explicitly provide community facilities with the exception of improved public realm. It does, however, include a mix of uses including office and retail space, alongside enhancing the public realm.</p>	<p>Neutral</p>	<p>No further mitigation required.</p>
<p>Does the proposal provide opportunities for the voluntary and community sectors?</p>	<p>Yes</p>	<p>The Applicant will provide opportunities for the voluntary sector to access affordable workspace in the building with a discount of 40%. The Applicant has held conversations with Bow Arts (a charity currently occupying part of the building as affordable art studios) to discuss the type of affordable workspace required in the Proposed Development. They have also met with Dragon Hall and Phoenix Gardens to discuss the proposals.</p>	<p>Positive</p>	<p>No further mitigation required.</p>
<p>Does the proposal take into account issues and principles of inclusive and age-friendly design?</p>	<p>Yes</p>	<p>As outlined in the Design and Access Statement, the Proposed Development has been designed to improve levels of accessibility for all disabled people, in terms of both access and egress to and around the Site as well as within the building itself.</p> <p>Age-friendly adjustments can be incorporated at a later date by a tenant if required.</p>	<p>Positive</p>	<p>No further mitigation required.</p>

**Table 4.9 Minimising the Use of Resources**

Assessment Criteria	Relevant?	Details/ Evidence	Potential Health Impacts	
Does the proposal make the best use of existing land?	Yes	<p>The Proposed Development meets Policy GG2 'Making the best use of land' of the London Plan by reusing and refurbishing land that has previously been developed for a mix of uses and enhancing the amenity value of the Site for occupiers and the local community.</p> <p>The Proposed Development will deliver 10,434 sqm of additional office and retail space (GIA) and increase the number of storeys above ground from 10 to 12. The intensification of this land will increase its density and direct growth towards a place well-connected to services, infrastructure and amenities, making efficient use of Camden's limited land.</p>	Positive	No further mitigation required.
Does the proposal encourage recycling (including building materials)?	Yes	<p>The proposed development has set the following waste targets in the Design and Access Statement for recycling building materials:</p> <ul style="list-style-type: none"> <li>• 90% of demolition &amp; construction waste diverted from landfill reused and recycled</li> <li>• 80% of construction waste to be reused off-site or recycled</li> <li>• 20% by mass of new materials with recycled content</li> </ul> <p>The design also includes the deployment of greywater recycling systems.</p>	Positive	No further mitigation required.

Does the proposal incorporate sustainable design and construction techniques?	Yes	<p>The proposed development incorporates sustainable design and construction techniques such as:</p> <ul style="list-style-type: none"> <li>• Maximising reuse of the existing structure, retaining c.75% of the existing structure in situ</li> <li>• Replacing the facade with a new optimised system</li> <li>• Low-flow and water efficient sanitaryware</li> <li>• Rainwater and greywater harvesting system to reduce reliance on mains water supply</li> <li>• Responsible sourcing certification requirements for key construction materials</li> <li>• PV panels at roof level</li> <li>• Terraces and new public realm provision, informed by specialist ecologist input</li> </ul>	Positive	No further mitigation required.
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**Table 4.10 Climate Change**

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impacts	Recommended Mitigation or Enhancement Actions
Does the proposal incorporate renewable energy?	Yes	The Design and Access Statement states that the design includes the application of 150 m <sup>2</sup> of PV panels at roof level resulting in c.22,000 kWh/year of generation from renewables.	Positive	No further mitigation required.
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperature, i.e. ventilation, shading and landscaping?	Yes	<p>The Design and Access Statement states that the design comprises on-floor Air Handling Units (AHUs) to provide outside air to the office accommodation and heat recovery, filtration, supply/extract fans and heating/cooling coils.</p> <p>A ceiling mounted 'climate island' system will provide local heating and cooling throughout the year with heat recovery in the winter and opportunities for free cooling during the summer.</p> <p>The Energy &amp; Sustainability Statement adds that the new optimised system for the façade minimises excessive solar gains in the upper levels areas during summer months, while the central atrium aids to maximise daylight provision for the lower levels.</p>	Positive	No further mitigation required.

<p>Does the proposal maintain or enhance biodiversity?</p>	<p>Yes</p>	<p>According to the Preliminary Ecological Appraisal (September 2024), the proposal will increase the biodiversity of the area through the following enhancements:</p> <ul style="list-style-type: none"> <li>• Potential sustainable drainage systems at ground level</li> <li>• Garden planting at ground level and strategic greening within the public realm and on-street facing boundaries</li> <li>• Terrace gardens complementing the green environment at Phoenix Gardens</li> <li>• Biodiversity green roofs</li> </ul> <p>As the Site does not possess over 25 m2 of semi-natural habitat, it is exempted from legislative biodiversity net gain requirements.</p>	<p>Positive</p>	<p>No further mitigation required.</p>
<p>Does the proposal incorporate sustainable urban drainage techniques?</p>	<p>Yes</p>	<p>According to the Flood Risk Assessment (October 2024), the proposal incorporates sustainable drainage systems including:</p> <ul style="list-style-type: none"> <li>• Provision of green roofs at various levels, contributing to an intercepting storage</li> <li>• Attenuation volume provided in a free-standing tank located in the basement</li> <li>• Potentially re-use of the existing combined water outfall</li> </ul> <p>It is expected that the drainage strategy will reduce the potential risk to the site and surrounding area from overland flow or sewer flooding.</p>	<p>Positive</p>	<p>No further mitigation required.</p>

## 5 Summary and Conclusions

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:

Health Determinant	Positive Health Impacts
<b>Access to healthcare and Social care services and other social infrastructure</b>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Receptor Populations: Local residents	
<b>Access to Open Space and Nature</b>	<ul style="list-style-type: none"> <li>Retains and enhances existing public spaces and creates two new public outdoor spaces that are safe and accessible for all</li> <li>New pedestrian routes, planting schemes and greening connect into surrounding areas and support stronger links into wider public realm</li> </ul>
Receptor Populations: Local residents Workers	
<b>Air quality and noise</b>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Receptor Populations: Local residents Workers	
<b>Accessibility and active travel</b>	<ul style="list-style-type: none"> <li>Well-connected to public transport infrastructure, to local cycle connections and to local facilities and amenities</li> <li>New, safer and illuminated pedestrian routes connect into existing network thereby improving site connectivity and permeability</li> <li>Provides at least 486 short and long stay cycle parking spaces to support modal shift towards active travel</li> <li>Car free development that will actively contribute towards the promotion of sustainable travel options for building users</li> <li>Provides inclusive design features to allow access for people with mobility challenges</li> <li>Provides adapted cycle parking provision (5% of total provision) and one on street disabled parking space</li> </ul>
Receptor Populations: Workers and Visitors	
<b>Crime reduction and community safety</b>	<ul style="list-style-type: none"> <li>Enhances existing public realm and activates ground floor uses</li> <li>Design out crime measures implemented including active and passive surveillance measures, on-site security and lighting strategy</li> </ul>
Receptor Populations: Local Residents Workers and Visitors	
<b>Access to healthy food</b>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Receptor Populations: Local Residents Workers and Visitors	
<b>Access to work and training</b>	<ul style="list-style-type: none"> <li>Generates up to 2,165 FTE additional jobs on site providing opportunities for employment and training</li> <li>Supports up to 239 jobs per annum (160 direct construction jobs and 80 indirect jobs) during the construction phase as well as 47 construction apprenticeships</li> <li>Provides some workspace at a discounted rate, providing high quality and affordable accommodation for local businesses</li> <li>Supports local procurement initiatives during construction and operation</li> </ul>
Receptor Populations: Local Residents	
<b>Social cohesion and lifetime neighbourhoods</b>	<ul style="list-style-type: none"> <li>Providing enhanced shared spaces and pedestrian routes that promote social interaction</li> <li>Incorporates inclusive design measures</li> </ul>

Receptor Populations: Local Residents Workers	
<b>Minimising the use of resources</b>	<ul style="list-style-type: none"> <li>• Makes best use of existing land through land use intensification in a sustainable, well-connected location</li> <li>• Implements sustainable design and construction techniques alongside recycling measures during construction and operation</li> </ul>
Receptor Populations: Local Residents Workers	
<b>Climate change</b>	<ul style="list-style-type: none"> <li>• Incorporates renewable energy through photovoltaics</li> <li>• Implements design measures that will provide local heating and cooling throughout the year, minimises solar gains at upper level and maximises daylight at lower levels</li> <li>• Enhances biodiversity through ground level planting, terrace gardens and green roofs</li> </ul>
Receptor Populations: Local Residents Workers	

The HIA has identified a number of mitigation or enhancement measures which will minimise any negative health benefits. The key measures are:

- Measures to enhance local employment and procurement opportunities at both construction and operation stage which are set out in the Employment and Skills Strategy.
- Implement mitigation measures and best practice management practices highlighted in the Noise and Air Quality Impact Assessment and the Construction/Demolition Management Plan.
- Disabled parking space provision to be negotiated as part of a S106 agreement.

