Health Impact Assessment Addendum Camden Goods Yard S73 Application

July 2020



Contents

1.	Introduction	1
2.	Update to Relevant Policy	3
3.	Updated Assessment of Health Impact	8
4.	Conclusion	18

Amy Gilham amy.gilham@turley.co.uk Client Turley Our reference STGP3001

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1. Introduction

- 1.1 A Health Impact Assessment was submitted as part of the 2017 planning application for the redevelopment of Camden Goods Yard (the 'extant scheme'). Permission was granted in 2018 and subsequently amended in May 2020 by a S73 variation to enable the provision of a temporary store on the petrol filling station part of the Site.
- 1.2 A S73 application is being submitted by St George West London Limited in summer 2020 reflecting scheme changes (the 'optimised scheme'). This includes the following changes of relevance to the Health Impact Assessment:
 - An additional 71 homes, including 8 additional homes for affordable rent and 11 additional homes of intermediate tenure¹.
 - A new accommodation schedule resulting in increased volume of affordable homes (8 additional affordable rent and 11 additional intermediate)
 - A reduction in car parking spaces and an increase in cycle spaces
 - Increased quantum of public realm and children's play space
 - Working with Camden Employment and Training team to ensure maximum number of apprentices, engagement with local schools and identify local procurement opportunities
- 1.3 This report details the implications of these changes by providing an updated consideration of those indicators affected under the following themes:
 - Housing quality and design
 - Access to health and social care services and other social infrastructure
 - Access to open space and nature
 - Accessibility and active travel
 - Crime reduction and community safety
 - Access to healthy food
 - Access to work and training
- 1.4 Only those indicators impacted by the scheme changes to a degree which would change the previous assessment are included.
- 1.5 There are no implications on the previous assessment of any of the indicators relating to the themes of 'Air quality, noise and neighbourhood amenity', 'Social Cohesion and

¹ The total number of homes is 644.

Inclusive Design', 'Minimising the use of resources' or 'Climate change' and so these sections do not appear within the Addendum.

1.6 Since the time of the previous submission, the Healthy Urban Development Unit has updated its Rapid Health Impact Assessment Toolkit (2019, 4th edition) (though the Healthy Urban Planning Checklist (2017, 3rd edition) still remains relevant). This does not change the basis of the assessment but has been used as appropriate to ensure the update is in keeping with the latest guidance.

2. Update to Relevant Policy

Updates to Camden Policy

Camden Local Plan 2017

1.1 The current Camden Local Plan² was adopted in 2017 (replacing the 2010 Core Strategy) and covers the period 2016-2031. At the time of the extant application the document was in draft form. Updated policies relevant to this Addendum are set out in the below table.

Table 1.1:	Relevant Camden Local Plan Policies
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Policy	Key Provisions		
A2: Open Space	To secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough's network of open spaces, the Council will:		
	 Seek developer contributions for open space enhancements using Section 106 agreements and the Community Infrastructure Levy (CIL); 		
	 Apply a standard of 9 sqm per occupant for residential schemes and 0.74 sqm per worker for commercial schemes; 		
	 Give priority to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable; 		
	 Ensure developments seek opportunities for providing private amenity space; and 		
	 Give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space 		
C1: Health and Wellbeing	To improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities, the Council will:		
	 Require development to positively contribute to creating high quality, active, safe and accessible places; and 		
	 Require that proposals for major development schemes include a Health Impact Assessment (HIA) 		
C2: Community facilities	To ensure that community facilities and services are developed and modernised to meet changing community needs and reflect new approaches to service delivery, the Council will:		
	 Seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments; 		
	• Expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements; and		

² London Borough of Camden Council (2017) Camden Local Plan

• Facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community

LBC, 2017

Camden Planning Guidance: Public Open Space

- 1.2 The Council formally adopted Camden Planning Guidance Public Open Space (CPGPOS)³ in March 2018. This document replaces the 'Open Space, Outdoor Sport and Recreation Facilities' section of the Council's 'CPG6: Amenity' (September 2011) and the 'Provision of Public Open Space' section of 'CPG8: Planning Obligations' (July 2015).
- 1.3 CPGPOS re-states Camden Local Plan Policy A2: Open Space regarding the standards by which developments are expected to contribute towards open space and play facilities.
- 1.4 CPGPOS outlines the maximum distance it is considered that people can reasonably be expected to travel on a regular basis to use different types of open space. Whilst green amenity space and children's play space should be available within easy walking distance of the development to which they relate, it is also acknowledged that people are generally willing to travel further to use recreation areas providing outdoor sport facilities or to larger parks. The below table outlines the distance thresholds for types of public open space.

Type of public open space	Maximum distance from development to public open space	Definition of Space Type / Notes on Provision
Public amenity open space	280m	Formal or informal parks and gardens or other landscaped areas, which provide areas of passive recreation for all age groups and attractive green areas within the urban environment
Formal recreation area	1.2 km	Areas of grassed or artificial surfaces providing opportunities for sport and recreation. It is stated that the potential to add to outdoor sports facilities is limited in Camden.
Natural greenspace	1km walk from publicly accessible Borough/Metropolitan Site of Importance for Nature Conservation (SINC)	Includes sites and areas formally recognised for nature conservation value, such as Sites of Special Scientific Interest, Sites of Nature Conservation Importance and Local Nature Reserves as well as other areas with biodiversity such as gardens, parks and open spaces.
Allotments and community gardens	Any	Provide opportunities for people to grow food as part of the long term promotion of sustainability, health and social inclusion. It is stated that provision will be sought wherever an opportunity arises, but

Table 1.2: Distance threshold for types of public open space

³ London Borough of Camden Council (2018) Camden Planning Guidance: Public Open Space

		will not be counted as part of the public open space standards.
Play Space Provision		
Under 5s	100m	Small landscaped play area with age-appropriate play features and furniture for parents and carers.
5 -11 year olds	400m	Play area with age-appropriate play features within a landscaped space and furniture for parents and carers;
		Kickabout areas:
		Bike track, scooter park or other age-appropriate wheeled facility
12 years and above	800m	Social space appealing to young people, with one or more of the following recreational opportunities:
		- Adventure playgrounds;
		 Sport or recreation space that is open access (e.g. ball court, basketball court, multi-use games area);
		- Skatepark, bike park or other wheeled facility;
		 Fitness trails or other age-appropriate fitness equipment/ areas;
		- Outdoor stage
		 Youth shelters or other sociable seating spaces meeting the needs of this age group
Natural greenspace	500m	As outlined above.

LBC, 2018

- 1.5 Civic spaces, hard surfaced areas designed for pedestrians, such as piazzas, which are often destinations and provide opportunities for communities to come together and interact are also identified as a type of public open space, albeit no access standards are outlined.
- 1.6 It is stated that the Council will apply the thresholds flexibly and that:

"Section 106 agreements will specify a named site where the Council agrees that a payment in lieu is the most appropriate way of meeting the Local Plan policy requirements. We will consider departing from the distances below if there is a reasonable likelihood that improvements to the capacity and quality of existing open spaces at greater distances from the development will genuinely bring benefit for occupants of a proposed scheme"⁴

⁴ Ibid. Appendix B: Catchment distances and deficiency areas

Updates to London-wide Policy

The London Plan – Intend to Publish Version

- The 'London Plan Intend to Publish Version'⁵ was published in December 2019 and is therefore at an advanced stage and carries significant weight, albeit not yet formally adopted. Following receipt of the Inspectors report, the Greater London Authority (GLA) is working to a timetable of summer 2020 to publish the final version.
- 2. Policies relevant to this ES Chapter Addendum are set out in the below table.

Table 2.1:	Relevant London Plan Policies	

Policy	Key Provisions
GG3: Creating a Healthy City	To improve Londoner's health and reduce health inequalities, those involved in planning and development must:
	(i) Assess the potential impacts of development proposals and Development Plan on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments;
	 Plan for appropriate health and care infrastructure to address the needs of London's changing and growing population;
	(iii) Plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports; and,
	(iv) Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.
G4: Open space	Development proposals should:
	(i) Not result in the loss of protected open space;
	(ii) Where possible create areas of publicly accessible open space, particularly in areas of deficiency.
T2: Healthy	Development proposals should:
Streets	 Deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling;
	 Demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance;

⁵ Mayor of London (2019) London Plan – Intend to Publish Version

S4: Play and informal	Development proposals for schemes that are likely to be used by children and young people should:					
recreation	 Increase opportunities for play and informal recreation and enable children and young people to be independently mobile 					
	(ii) For residential developments, incorporate good-quality, accessible play provisio for all ages. At least 10 square metres of playspace should be provided per child that:					
	 a) provides a stimulating environment; b) can be accessed safely from the street by children and young people independently; 					
	c) forms an integral part of the surrounding neighbourhood;					
	d) incorporates trees and/or other forms of greenery;					
	e) is overlooked to enable passive surveillance; andf) is not segregated by tenure;					
	 (iii) Incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently; 					
	 (iv) For large-scale public realm developments, incorporate incidental play space to make the space more playable; 					
	(v) Not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future deman for play provision.					
33: Education and childcare	To ensure there is a sufficient supply of good quality education and childcare facilities t meet demand and offer educational choice, boroughs should:					
acilities	 Assess needs locally and sub-regionally, addressing cross-boundary issues. Need assessments should include an audit of existing facilities; 					
	(ii) Ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision					
52: Health and social care	Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:					
facilities	 (i) Identify and address local health and social care needs within Development Plar taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies; and 					
	 (ii) Assess needs locally and sub-regionally, addressing borough and CCG cross- boundary issues 					

3. Updated Assessment of Health Impact

Table 3.1: Assessment of Health Impact – Housing quality and design

Assessment criteria	Relevant?	Details / evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	⊠ Yes □ No □ N/A	The scheme will provide 644 new residential units. Of these, 38% by habitable room will be affordable housing, of which 66% by habitable room are for social rent and 34% are for intermediate rent. A mix of unit sizes will be supported, with additional affordable housing in line with planning policy as per the extant scheme.	 ☑ Positive □ Negative □ Neutral □ Uncertain 	No mitigation required

Assessment criteria	Relevant?	Details / evidence	Potential health impact?	Recommended mitigation or enhancement actions	
Does the proposal assess the impact on health and social care services and has local NHS organisations been contacted regarding existing and planned healthcare capacity?	⊠ Yes □ No □ N/A	 The capacity of GP surgeries with a 1 mile walking distance has been assessed based on GP:patient ratio information received from Camden and Islington Public Health (2017). This has been updated to use the latest data (2019) available from NHS Digital to identify the number of registered patients and GPs at the 8 relevant surgeries. The data shows that: The surgeries collectively have 70,564 patients and 204. 4 Full Time Equivalent (FTE) GPs; and This equates to an average of 1,345 patients per FTE GP, which is lower than the Camden average of 1,482 patients per FTE GP. The 	 □ Positive □ Negative ⊠ Neutral □ Uncertain 	No mitigation required	
		Royal Academy of General Practitioners set out a recommended target of 1 GP per 1,800 people. Therefore 1,328 ⁶ additional residents will increase the number of patients per GP to 1,370 which remains lower than the Camden average. Given existing provision of pharmacies, opticians and hospitals mean that the scheme will have a minimal impact on these services.			
Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. primary, secondary and post 16 education needs and community facilities?	⊠ Yes □ No □ N/A	 The capacity of the local social infrastructure is as follows: Primary Schools - There are 382 surplus places within primary schools in the Camden Primary School Planning Area 3, with spare capacity set to continue. The demand from 94 additional pupils 	 Positive Negative Neutral Uncertain 		

Table 3.2: Assessment of Health Impact – Access to health and social care services and other social infrastructure

⁶ Using GLA Population Yield Calculator

from the Proposed Development will be accommodated in local primary schools⁷.

- Secondary Schools There are 525 surplus places within secondary schools in the borough, with spare capacity forecast to continue. The demand from 67 additional pupils from the Proposed Development will be able to be accommodated in local secondary schools⁸.
- **Community Facilities** The provision of 74sqm (GIA) community space on site (in Block D and within the Morrison's store) means that the Proposed Development continues to make a positive contribution to community facilities.

No mitigation required

⁷ Based on Census 2011 age profile for Camden which gives a higher pupil yield generation than the GLA Population Yield calculator and is therefore used to present a worst case ⁸ Based on Census 2011 age profile for Camden which gives a higher pupil yield generation than the GLA Population Yield calculator and is therefore used to present a worst case

Table 3.3:	Assessment of Health Impact – Access to open space and nature
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Assessment criteria	Relevant?	Details / evidence	Potential health impact?	Recommended mitigation or enhancement actions
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	⊠ Yes □ No □ N/A	The development proposals incorporate landscaped gardens and public realm between buildings. This is also a car free development enabling residents to enjoy newly created and accessible public space. The Proposed Development will create new public realm and opportunities for local residents to interact outside. A total of 12,254 sqm of communal amenity, play space and landscaping will be provided, including 561 sqm of food growing space. This is an increase of 1,031 sqm from the consented scheme.	 Positive Negative Neutral Uncertain 	No mitigation required
Does the proposal provide a range of play spaces for children and young people?	⊠ Yes □ No □ N/A	There will be 1,265sqm of formal play space provided on site. Each space is designed for different age categories, including: under 5 years, 5-11 years and above 12 years old. There will also be additional areas which fall within Camden's broader definition ⁹ of play space including 2,932 sqm of green amenity space and 7,496 sqm of civic space. The objective is to locate and integrate a series of natural play features into the public and semi-private areas to create interest and active uses in the public realm, without disturbing residential uses or conflicting with functions of different areas ¹⁰ .	 ☑ Positive □ Negative □ Neutral □ Uncertain 	No mitigation required

 ⁹ London Borough of Camden Council (2018) Camden Planning Guidance: Public Open Space
 ¹⁰ Design and Access Statement Camden Goods Yard (2017)

Assessment criteria	Relevant?	Details / evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal address the ten	🛛 Yes	The ten healthy streets indicators are:	⊠ Positive	
healthy streets indicators?	🗆 No	1. Pedestrians from all walks of life	□ Negative	
	□ N/A	2. People choose to walk, cycle and use public transport	Neutral	
		3. Clean air	🗆 Uncertain	
		4. People feel safe		
		5. Not too noisy		
		6. Easy to cross		
		7. Places to stop and rest		
		8. Shade and shelter		
		9. People feel relaxed		
		10. Things to see and do		•
		The proposal includes areas of landscaping for public use as well as private		No mitigation required
		amenity areas for residents. These areas provide space for individuals from a		
		variety of walks of life (local residents, local employees, visitors to Camden)		
		to move through the environment as well as spaces to stop and rest with		
		shade and shelter through landscaping. These areas are away from Chalk		
		Farm Road and will benefit from noise and air pollution reduction as a result. The development is close to good public transport links and those using the		
		space will have a number of active travel options as set out in the Camden		
		Goods Yard Planning Framework Supplementary Planning Guidance (July		
		2017). The development will include 'things to see and do' including food		
		growing, use of community space, retail and so on. It is also in close proximity		
		to the wider offer of Camden and the market.		

Table 3.4: Assessment of Health Impact – Accessibility and active travel

Does the proposal prioritise and encourage cycling for example by providing secure cycle parking, showers and cycle lanes?	⊠ Yes □ No □ N/A	The Proposed Development makes provision for the storage of bicycles on site including 1,054 cycle spaces for residents and 92 for commercial uses. New cycle hire facilities are encouraged in the Camden Goods Yard Planning Framework Supplementary Planning Guidance (July 2017).	 ☑ Positive □ Negative □ Neutral □ Uncertain 	
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 □ No □ N/A	Car parking provided at the superstore will reduce from its current level to 250 spaces. This will include 12 accessible spaces and 50 active EV charging points. For residential, only accessible bays will be provided (23 spaces). This will include 5 EV spaces and 18 passive spaces.	 ☑ Positive □ Negative □ Neutral □ Uncertain 	No mitigation required

Table 3.5: Assessment of Health Impact – Crime reduction and community safety

Assessment criteria	Relevant?	Details / evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal include attractive multi-use public spaces and buildings?	[,] ⊠ Yes □ No □ N/A	Community space in Block D and on the mezzanine levels of the Morrison's store will create multi-use space (74 sqm (GIA)). Public plazas and spaces, such as Southampton Square, Markers Yard and the Good Yard, will be open to the	 ☑ Positive ☑ Negative ☑ Neutral ☑ Uncertain 	V No mitigation required

public. It is envisaged that activities local events and markets could take place here¹¹.

¹¹ Design and Access Statement (2017)

Table 3.6:	Assessment of Health Impact – Access to healthy food
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Assessment criteria	Relevant?	Details / evidence Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers' markets?	⊠ Yes □ No □ N/A	 Allotments – 561 sqm of allotment space for community growing projects; Urban Farm (1,515 sqm GIA) – The likely occupant is to be a food growing project, with the potential for a café and farm shop. This will be an educational facility and create volunteering opportunities for the local residents. 	V No further action required

Assessment criteria	Relevant?	Details / evidence	Potential health impact?	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 □ No □ N/A	 The proposed development will support jobs in both the construction (temporary) and operational (permanent end use) phases. Analysis undertaken for the extant scheme identified 131 FTE demolition and construction jobs on site plus 1,184 operational FTE jobs. Uplifting the operational employment to reflect the proportional uplift in commercial space provides a job estimate of 1,190 FTEs once operational¹². The S106 agreement (June 2018) sets out comprehensive commitments to employment and training including: Construction Employment and Training Plan submitted prior to each Phase for approval including reflection of Construction Industry Training Board benchmarks for local employment when recruiting for construction-related jobs. This will include no less than 73 construction apprentices at any one time plus no less than 20 work placements and work experience opportunities. Supermarket Employment and Training Plan including no less than 3 end use full time apprentices at any one time, provided with appropriate on the job or day release training to achieve a Level 2 Apprenticeship Framework qualification. 	 ☑ Positive □ Negative □ Neutral □ Uncertain 	v No further action required

Table 3.7: Assessment of Health Impact – Access to work and training

¹² The estimate of gross on-site employment is based on the methodology from the Socio-economics ES Chapter (2017) produced for the extant scheme, updated proportionately as per the proposed non-residential floorspace schedule for the optimisation scheme. This has resulted in a minor uplift in operational on-site employment, increasing from 1,184 Full Time Equivalent (FTE) on-site employees as previously assessed to 1,190 FTE for the current proposal.

Does the proposal include opportunities for work for local people via local procurement arrangements?		 Local procurement will be secured via commitments as set out in the S106 agreement (June 2018). This includes: Agreement prior to each construction phase to provide opportunities for local businesses to bid/tender for the provision of goods and services in accordance with the Council's Local Procurement Code 	 Positive Negative Neutral Uncertain 	\checkmark
		 Post construction, the owner shall use reasonable endeavours to provide opportunities for local businesses to bid/tender for the provision of facilities management services and other required goods and services. 	2	No further mitigation required

4. Conclusion

- 4.1 The extant scheme provided a range of benefits to future residents and other users of the proposed development. The changes incorporated within the optimisation scheme further increase these benefits including:
 - Provision of more homes, an uplift of 71 units;
 - An increase in affordable units, from 184 to 203 units;
 - More communal amenity, play space and landscaping, from 11,223 sqm to 12,254 sqm; and,
 - A decrease in parking spaces and increase in cycle parking to further encourage active travel
- 4.2 The changes in baseline, and future baseline, for secondary education also result in demand from the scheme being able to be accommodated within forecast provision.
- 4.3 The employment and skills commitments and procurement commitments made and secured in the extant scheme pursuant to the S106 agreement (dated 15 June 2018) will continue and apply to the optimisation scheme. Confirmation of these has provided more certainty with regards to local employment, training and procurement opportunities'.
- 4.4 Overall the scheme will have positive impacts across all indicators affected by the changes submitted within the S73 application.

Turley Office 8th Floor Lacon House 84 Theobald's Road London WC1X 8NL

T 020 7851 4010

