



# Network Building, Tottenham Court Road

## Health Impact Assessment



Derwent Valley Property  
Developments Ltd  
November 2020



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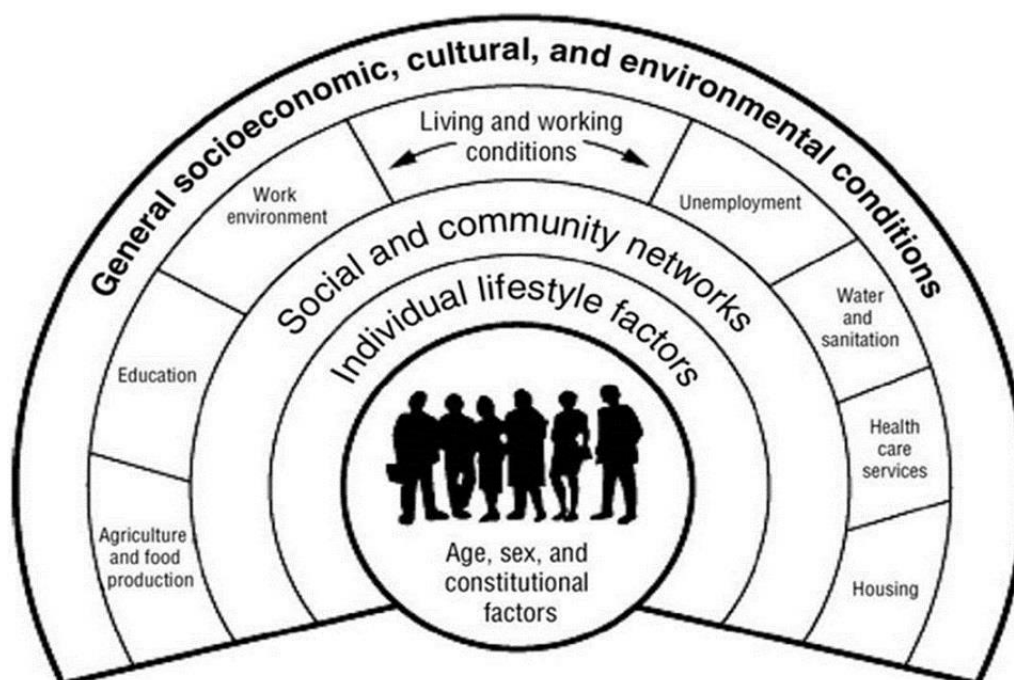
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## 1.0 Introduction

### 1.1 Determinants of Health

- 1.1.1 The constitution of the World Health Organisation (WHO) defines health as not only the absence of disease or infirmity, but also as 'a state of complete physical, mental and social well-being.' It emphasises that all people have right to the highest attainable standard of health and wellbeing, stating that health is 'one of the fundamental rights of every human being without distinction of race, religion, political belief, economic or social condition.'
- 1.1.2 It is now accepted that an individual or community's health is determined not only by the availability and quality of healthcare services, but that a range of economic, social, psychological and environmental influences play an equally important role (Figure 1).
- 1.1.3 The built environment has an extremely important role in this approach, and the planning system has recognised health as a key concern. There is increasing recognition that some of the most challenging health and wellbeing concerns, including inequalities, obesity and the population, can be mitigated by the quality of the local environment.
- 1.1.4 Therefore, it is vital that changes or developments to our built environments contribute to good health and wellbeing and reduce ill health and inequalities.

**Figure 1 Social determinants of health (Source: Dahlgren and Whitehead (1991))**





## 1.2 Legislation and Policy

### National

#### The National Planning Policy Framework (NPPF)

1.2.1 The NPPF 2019 supports the role of planning to create healthy, inclusive communities by supporting local strategies to improve health, social and cultural wellbeing for all and by working with public health leads and health organisations to understand and take account of the health status and needs of the local population.

1.2.2 Chapter 8 identifies a number of actions that planning policies should incorporate to achieve healthy, inclusive and safe places. Chapter 8 also identified that:

*'Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.*

*Healthy Lives, Healthy People: our strategy for public health in England.*

1.2.3 Published in November 2010, the White Paper sets out the Government's long-term vision for the future of public health in England.

### Local

#### Intend to Publish London Plan December 2019

1.2.4 Under the legislation establishing the Greater London Authority (GLA), the Mayor is required to publish a Spatial Development Strategy (SDS) and keep it under review. The SDS is known as the London Local Plan. The Examination in Public on the London Plan was held between 15<sup>th</sup> January and 22<sup>nd</sup> May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor. Having considered these, the Mayor issued his intention to publish the London Plan on the 9<sup>th</sup> of December 2019.

1.2.5 The new London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years and legally forms part of each of London's Local Planning Authorities' Development Plan and must be taken when planning decisions are taken in any part of Greater London.

1.2.6 The following policies are relevant to human health:

#### Policy GG3: Creating a healthy city

1.2.7 To improve London's health and reduce health inequalities, those involved in planning and development must:

- *Ensure that the wider determinants of health are addressed in an integrated and coordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities;*
- *Promote more active and healthy lives for all Londoners and enable them to make healthy choices;*
- *Use the Healthy Streets Approach to prioritise health in all planning decisions;*
- *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 Assessment;*

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- *Plan for appropriate health and care infrastructure to address the needs of London's changing and growing population; and,*
- *Plan for improved access and quality of green spaces, the provision of new green infrastructure and spaces for play, recreation and sports.*

### **Camden Local Plan 2017**

1.2.8 The Council has a number of policies which cover the aspects of communities, health and wellbeing. Those relevant to the proposed development are referenced below:

#### Policy C1: Health and Wellbeing

1.2.9 This policy seeks to ensure that developments in Camden consider local issues in relation to health and wellbeing at the very early stages of the planning process. The Council will require that:

- a. Development to positively contribute to creating high quality, active, safe and accessible spaces; and,*
- b. Proposals for major development schemes to include a Health Impact Assessment. Major developments are regarded as developments of 10 or more homes or a floorspace of 1,000sqm or more, including student housing and non-residential development*

1.2.10 In return the Council will:

- c. Contribute towards the health priorities of the Health and Wellbeing Board and partners to help reduce health inequalities across the borough;*
- d. Support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements; and,*
- e. Protect existing health facilities.*

#### Health Impact Assessments

*The scope of a HIA will vary depending on the size of the development and its location. The HIA should identify the likely health impacts of the development and include measures to improve health outcomes and address negative effects and inequalities. HIAs for developments of 100 homes or more, including student housing, will be expected to include details of the engagement they have undertaken with local health and community stakeholders in the community and how their input has influenced the development. Further information on HIA can be found in our supplementary planning document Camden Planning Guidance on amenity and the Mayor's Social Infrastructure supplementary planning document.*

#### Policy C5: Safety and Security

1.2.11 The Council will aim to make Camden a safer place by:

- a. work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;*
- b. require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;*
- c. require appropriate security and community safety measures in buildings, spaces and the transport system;*

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- d. promote safer streets and public areas;*
- e. address the cumulative impact of food, drink and entertainment uses; and,*
- f. promote the development of pedestrian friendly spaces.*

### Policy E5: Economic Development

1.2.12 The council will secure a successful and inclusive economy in Camden by:

- a. support businesses of all sizes;*
- b. maintain a stock of premises that are suitable for a variety of business activities;*
- c. support local enterprise development, employment and training schemes for Camden residents;*
- d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
- e. support the development of Camden's health and education sectors;*
- f. direct new office development to the growth areas;*
- g. support Camden's industries by:*
  - i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;*
  - ii. supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits;*
  - iii. safeguarding the Kentish Town Industry Area;*
  - iv. promoting and protecting the jewellery industry in Hatton Garden;*
- h. expect the provision of high-speed digital infrastructure in all employment developments; and,*
- i. recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.*

### **Planning for health and wellbeing Camden Planning Guidance July 2020 (Draft)**

1.2.13 The Camden Planning Guidance (CPG) documents were prepared to support the policies in the Camden Local Plan, with the health and wellbeing guidance, originally adopted in March 2018 currently undergoing consultation.

1.2.14 The guidance explains:

- *When and how a HIA should be prepared;*
- *How the council will manage the impacts on health and wellbeing;*
- *How planning can enhance the quality of health and wellbeing for those with greater needs; and,*
- *What health strategies and policies prepared by the Council can assist with preparing a HIA.*

### Health Impact Assessment

- 1.2.15 A HIA should be undertaken for all developments that give rise to significant health impacts:

*For schemes of between 10 and 99 dwellings and with 1,000 - 9,999sqm of additional commercial or visitor floorspace, developers should use the NHS London Healthy Urban Development's Rapid Health Impact Assessment Tool for preparing their HIA. For larger developments of 100 net dwellings or more, or 10,000sqm + of additional commercial or visitor floorspace, the Council will expect a more comprehensive Health Impact Assessment that analyses all potential health and wellbeing impacts.*

*For both the rapid and comprehensive HIA, 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. This must include engagement with vulnerable and sensitive groups when they are likely to be affected by a development, including construction impacts.*

*A HIA should contain a series of evidence based-recommendations setting out how a scheme can be enhanced and any mitigation measures that may be required.*

### **Camden's Joint Health and Wellbeing Strategy March 2019**

- 1.2.16 Camden's Joint Health and Wellbeing Strategy outlines five strategic priority areas which aim to tackle the causes of health inequality:

1. Healthy weight, healthy lives: making Camden a place where everyone has the opportunity to maintain a healthy lifestyle;
2. Reducing alcohol-related harm;
3. Resilient families: building family resilience and shifting the balance of service delivery towards earlier help and prevention;
4. First 1001 days: ensuring the support we provide from pregnancy through to the first two years of life;
5. Ensuring good mental health for all: promoting positive mental health and outcomes for people with serious mental health and conditions and preventing suicide wherever possible

### **Camden Joint Strategic Needs Assessment**

- 1.2.17 The Joint Strategic Needs Assessment (JSNA) is a process through which the council's social care services (Education, Social Care and Wellbeing) work together with public health and NHS services to assess the needs of the Tower Hamlets population and determine priorities for commissioning services.
- 1.2.18 The JSNA core dataset draws together data on population demographics, modifiable health and behavioural factors that contribute to poor health within Camden, the wider determinants of health and people affected, sexual and reproductive health and specific groups of people who have additional needs.
- 1.2.19 This guidance is used to examine the local demographics and health profile for comparison between regional and national level.



## 1.3 The Site and Development Proposals

1.3.1 The Network Building is located at 95-100 Tottenham Court Road London, at the junction of Tottenham Court Road, Howland Street and Whitfield Road.

1.3.2 The description the development proposals is the following:

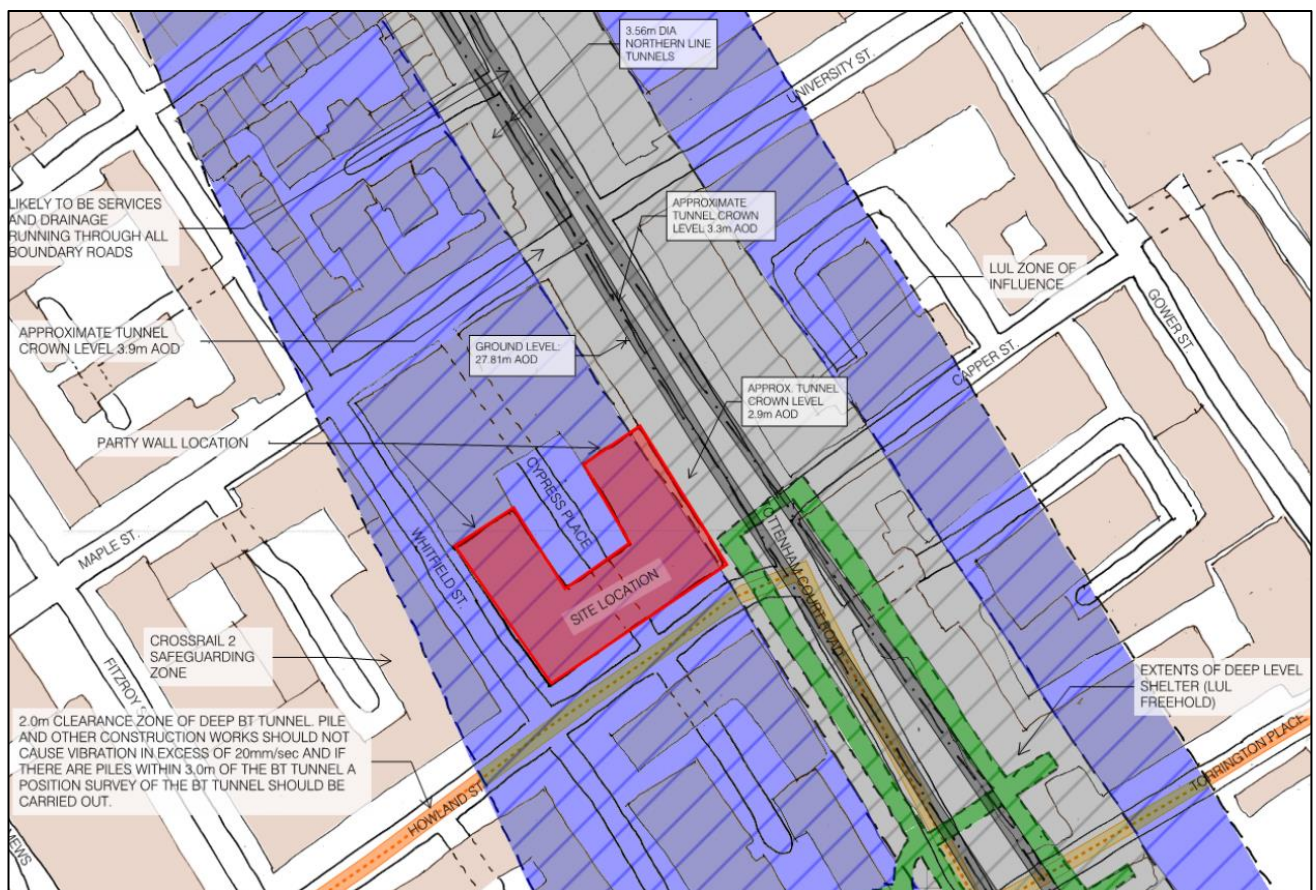
*"Demolition of the existing building and construction of a new building to provide for a maximum of 17275 sqm (GIA) of E class use floorspace along with details of access, scale and landscaping and other works incidental to the application (layout and appearance reserved)."*

1.3.3 This is submitted in support of the outline application and is based on the maximum area/parameters as set out in Drawings/DAS by Piercy&Co.

1.3.4 The development will also include the provision of a cycle store at lower ground / basement level and shared amenity space for all tenants of the building.

1.3.5 The existing residential accommodation at Network Building is proposed to be relocated to 14-19 Tottenham Mews.

**Figure 2 Site Redline Boundary**



### Access

1.3.6 The main access will be from Howland Street. The existing office entrance on Whitfield Street will be retained and will serve the ground floor of the proposed building.

1.3.7 The existing parking spaces on North Whitfield Street will be maintained.



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### Disability Discrimination Act

- 1.3.8 An accessible lift and accessible WCs are proposed on all floors of the building.

### Employment Units

- 1.3.9 The spaces provided within the courtyard building are flexible and can either be let per floor or divided up for smaller start-up companies.

### Biodiversity and Landscaping

- 1.3.10 All existing trees around the building are proposed to be retained. Additional parklets and tree planting along Whitfield Street adjacent to the building are proposed.

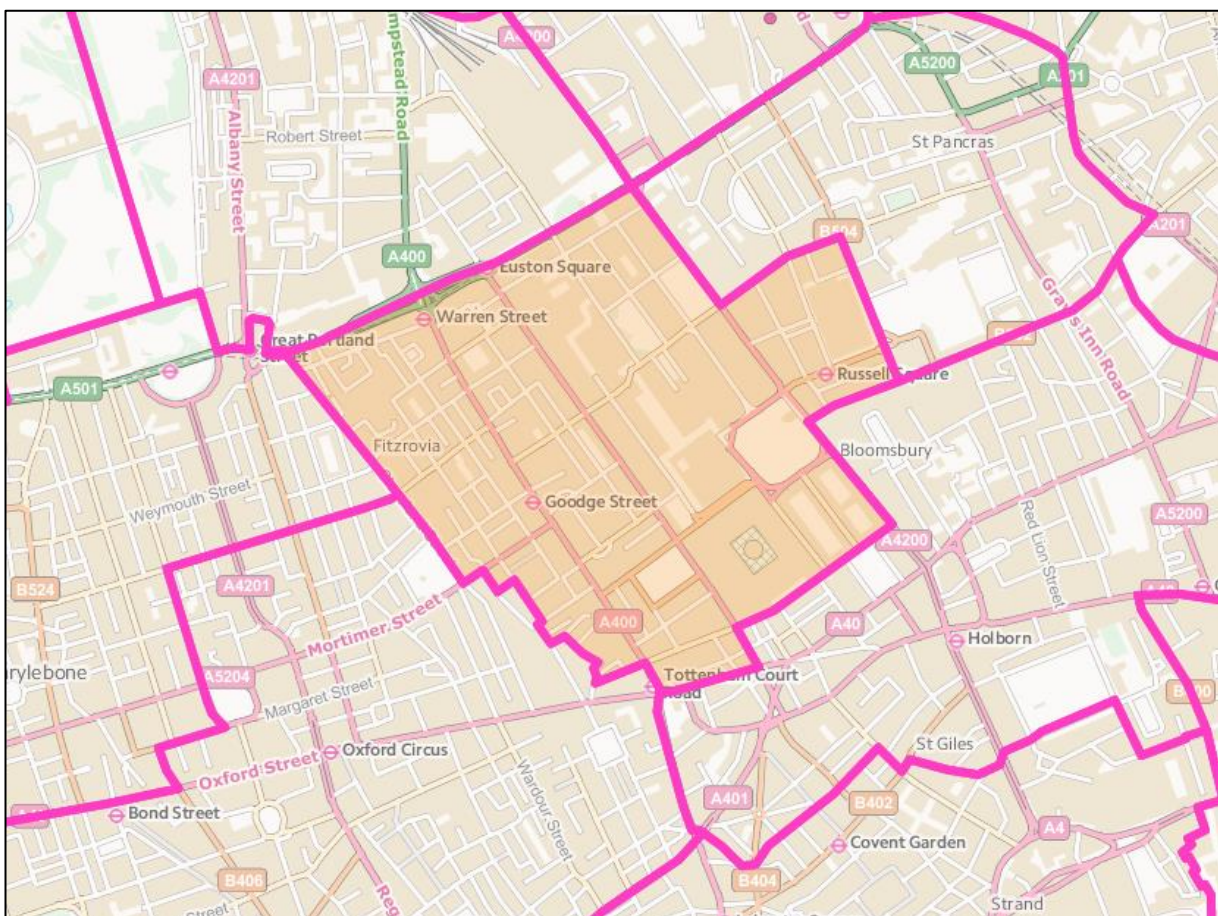
## 2.0 Local Health Profile

### 2.1 Population

Local Authority Ward: Bloomsbury

- 2.1.1 The development is located within Bloomsbury Ward within the London Borough of Camden. The 2011 census recorded this ward to contain a population of 10,900 residents.
- 2.1.2 The highest proportion of the population within the ward comprises of those aged between 30 and 44 at 22.1% of the population, followed by those residents aged 20 to 25 accounting for 22% of the population.

**Figure 3 Bloomsbury Ward**

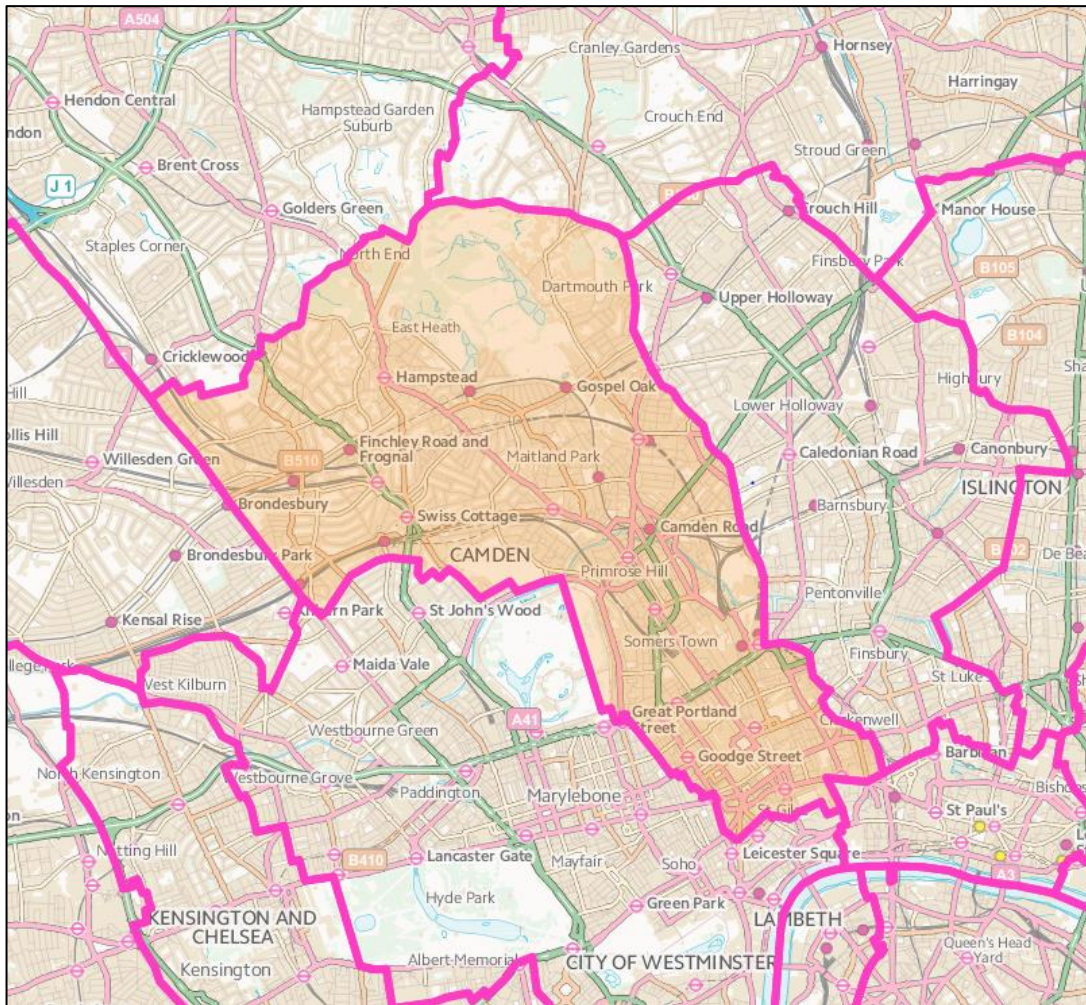


Source: Ordnance Survey

Local Authority: Camden

- 2.1.3 The Proposed Development is within the London Borough of Camden (Figure 4).

**Figure 4 Local Authority of Camden**

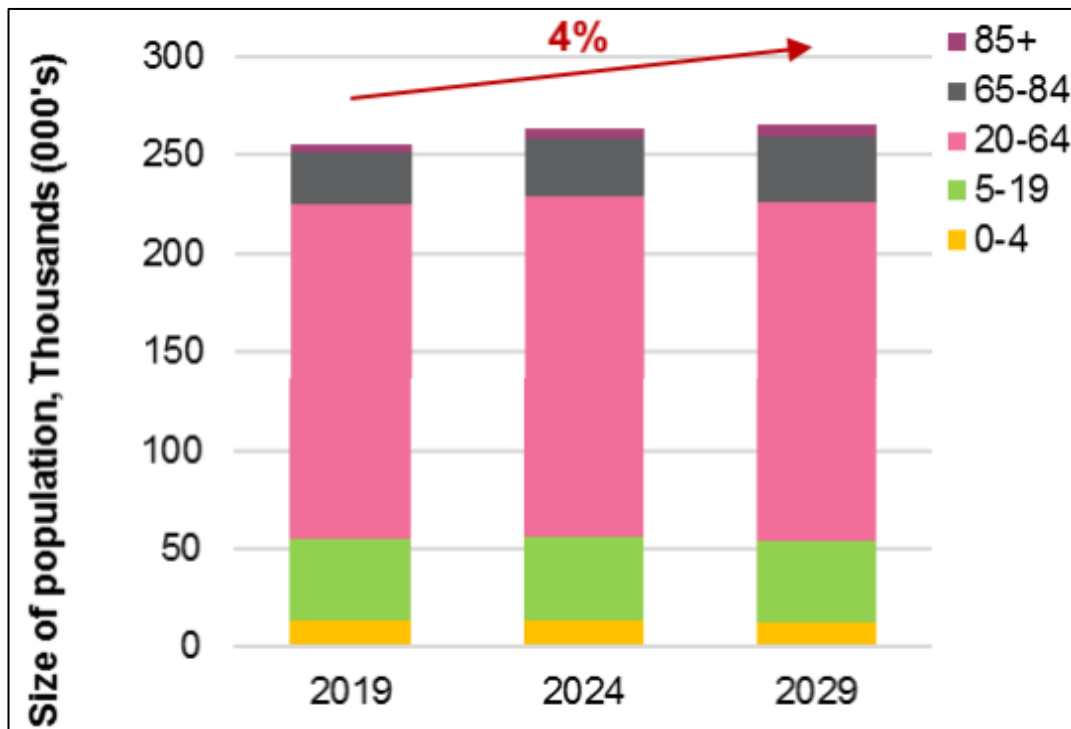


Source: Ordnance Survey

- 2.1.4 As per 2011 census, the population of Camden Borough totalled 220,400 people. The JSNA Summary produced for Camden in 2019<sup>1</sup>, identifies that Camden’s population is estimated to be 255,000 in 2019 and is due to increase by 4% to 265,350 over the next 10 years. The highest expected growth is in the older age groups, as illustrated in Figure 5 below.
- 2.1.5 As within the ward, the population structure within the borough is primarily between ages 20 to 34 years old, with the majority of the population aged between 25 to 29.
- 2.1.6 The borough is ethnically diverse, with the BME groups accounting for 34% of the population in 2019. This ratio is not projected to increase significantly in the next decade.

<sup>1</sup> <https://opendata.camden.gov.uk/Health/JSNA-Executive-Summary-2019/uewk-kdd3>

**Figure 5 Population growth for Camden: 2019, 2024, 2029 (Source: JSNA Summary)**



2.1.7 Deprivation is most concentrated in the south east of the borough, with Bloomsbury Ward and the development located within least deprived areas. The site ranked at 18,104 of the 32,484 Lower Super Output Areas (LSOAs), where 1 is most deprived and 32,844 LSOA is the least deprived.

County: Greater London Authority

2.1.8 The development is within the Greater London Authority (Figure 6) for which the 2017 population estimate totalled 8,835,500 people. This figure is anticipated to increase to 9,351,000 people by 2028 as per datasets provided by GLA<sup>2</sup>.

2.1.9 By broad age group, the average age within GLA is recorded at 36, compared to the national average of 40. The proportion of the population within their working age is at 73%, this totalling 63% nationally. The proportion of the population aged 65 and over is 12.5% and 17.7% nationally.

2.1.10 The impact on health and wellbeing as a result of the development would be felt both within the local and wider area. The assessment has therefore considered both the ward of Whitechapel (where relevant datasets were available) and the borough of Tower Hamlets as the main baseline for this assessment.

<sup>2</sup> <https://data.london.gov.uk/dataset/ward-profiles-and-atlas>

**Figure 6 Greater London Authority**



Source: Ordnance Survey



### 2.2 Health Profile

- 2.2.1 A Joint Strategic Needs Assessment (JSNA) produced for the Borough of Camden provides a baseline against which the success of healthcare in the borough can be measured and compared against. This provides evidence of the current health profile in the borough and consequently informs the development of the Health and Wellbeing Strategy for the Borough which is currently being consulted on.
- 2.2.2 The JSNA, where practical is broken down by age, gender and other nationally protected characteristics such as disability, civil partnership, race, religion and sexual orientation. On this basis, this assessment was divided into three distinct groups: children, adults and elderly and focused on the information provided for the wider borough and where information is available for Bloomsbury Ward and development site.

#### Children

- 2.2.3 Children aged 0-17 account for 34,100 of the borough population in 2019, with the majority of these concentrated in the centre and north west of the borough. Almost a third (30%) of Camden children live in poverty and almost 40% of all households with dependent children are overcrowded with more than 1.5 persons per room, suggesting significant inequalities in health and educational outcomes of children within Camden.

#### Health

- 2.2.4 The extent of childhood poverty is the most important determinant affecting the current and future health of children and young people. The likelihood is that this will be exacerbated by rising levels of unemployment in young people. The percentage of children and young people in Camden that live in Quantile 1 - the most deprived areas is 18.8%. The percentage of children that live in Quantile 5 – the least deprived areas is 15%, with the highest proportion living in Quantile 4 at 26%.
- 2.2.5 As per 2019 JSNA summary, a total of 32,426 (94.3%) children and young people aged between 0-17 were considered to be healthy (people with no significant health conditions). The highest proportion of the healthy children were identified within the north western extents of the borough.
- 2.2.6 In Camden 3% of all live births (with recorded birth weight) were considered to be of low birth weight (<2500g), which is higher than England (2.8%) but lower London (3.1%). Camden has a lower proportion (21%) of reception year children with excess weight compared to England (22.4%). The proportion of obese children in year 6 in Camden is 36%, having a similar prevalence of excess weight in year 6 children as London overall.
- 2.2.7 In 2015, there were 2,695 children and young people in Camden with a mental health disorder. This includes anxiety disorders, emotional disorders, hyperkinetic disorders and depression; this being similar in proportion to London overall.

#### Education

- 2.2.8 Inequalities in educational attainment in local schools were identified in Camden, specifically for children with higher level of absence or who are disadvantaged.
- 2.2.9 At Key Stage 2, the proportion of pupils achieving the expected level of reading, writing and mathematics was higher in Camden (86%) than England (80%) in 2015. Disadvantaged children however, achieved a lower level than the remainder of pupils within Camden.

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- 2.2.10 The GCSE attainment (5 or more A\*-C grades) of pupils attending schools in Camden (57%) is lower than the levels for London (61%), but higher than the average in England (54%) in 2015.
- 2.2.11 In 2018, a total of 3,550 (16% of the total school age population) were pupils with Special Educational Needs and Disability, this being higher than London and England at 14%.

### **Adults**

- 2.2.12 There are around 208,550 people aged between 18 to 64 within Camden, concentrated primarily in the south and centre of the borough.
- 2.2.13 Camden's population is expected to grow by over 20,500 persons by 2026 (+8.5%). The working age population (25-64) in Camden is expected to increase by 11,200 people (+8.0%) by 2026, similar to the increase expected across London for this age group (+7.7%) and to a total population of 156,200 by 2036.

### Deprivation

- 2.2.14 High level indicators of factors affecting the health of adults are employment rates, income levels, educational attainment, housing quality, community cohesion, physical environment, levels of healthy behaviours, and access to high quality health and social care services.
- 2.2.15 Housing costs in Camden are extremely high. As of October 2016, the average house price was £821,894, 19 times the median annual household income locally. The average monthly rent for Camden residents in 2015/16 was £3,223, 61% of the median monthly household income.
- 2.2.16 Two-thirds of the working age population in Camden are qualified to degree level or above, compared to 55% average in London. Approximately 68% of the population aged 16-64 (72% of the total Camden population) in Camden are in employment, three-quarters of these being in professional roles. The proportion is lower than the London average because of the higher numbers of full-time students and people looking after home/family. The gross annual income of the richest 20% of those employed in Camden is £52,930, whilst the gross annual income of the poorest 20% of those employed in Camden is £20,330.
- 2.2.17 Of the 28% of people which are economically inactive, 20% are inactive due to long-term sickness. Nonetheless, the rate of adults receiving long term support from the Local Authority is lower than the regional average and national average. The proportion of people looking after family in Camden is similar to the London average of 6.5%.

### Health and Behaviour

- 2.2.18 Out of the GP-registered population in Camden, 43% of the population are deemed as mostly healthy (non-smokers, healthy BMI, no long-term condition (LTC) and no high blood pressure (HBP)). The second highest segment (39%) of the population are classified as 'health at risk' (which may involve: being underweight/overweight, Smoker, HBP). The majority of the population with LTCs are typically from the older age groups (aged 55+) whilst the 'mostly healthy' population-segment are distributed among the younger groups: 18-44.





- 2.2.19 Based on the estimates of working age people registered with a GP, about 11% of these are diagnosed with mental health illness including serious mental illness or depression. Of these, around 50% of adults also have an alcohol or substance misuse problem. Of the 11% of those diagnosed with a mental health illness, 23% are also known to have at least one long-term problem, which directly impacts on the rates of suicide / risk of suicide.
- 2.2.20 Based on GP registration data, Camden's smoking prevalence in 18+ adults has declined since 2014. In 2018, Camden's prevalence (10.9%) was similar to London (13.8%) and significantly lower than England (19.8%).
- 2.2.21 In 2017/18, the proportion of 16+ adults meeting the recommended 5-a-day in Camden was 53.8%, similar to that in London and England. Camden (46.5%) however, had the lowest proportion of adults aged 18 and over classified as overweight or obese out of London's 32 boroughs.

### **Elderly**

- 2.2.22 There are currently almost 28,000 people over 65 in Camden and this number is expected to increase to approximately 35,000 in the next ten years (25% increase). This increase is expected to continue with an estimated over 65 population of 44,200 (including 8,400 aged 85 or over) in Camden by 2036.
- 2.2.23 While life expectancy beyond the age of 65 in Camden is high: 21 years for men (4th highest local authority in England) and 25 years for women (highest local authority in England), Camden men spend less of their life in good health (50%) than the England average of 56%. The proportion of life spent in good health for women is higher than the national average at 59%.
- 2.2.24 A significantly higher proportion of older people live in the most deprived areas (25%), compared to the England average of 16%. A total of 44% of older people in Camden live in social housing, a higher percentage than any other age group in Camden or London. About 13% of these households experience fuel poverty, which is directly linked to winter deaths.
- 2.2.25 Social isolation can have also a major impact on physical and mental health and can be more common amongst older people and in more deprived groups and for those that already have health problems. Camden has a higher proportion of people over 65 living alone (42%) compared to London (34.5%) and England (31%).
- 2.2.26 Based on the GP registration data, a total of 44% of people aged over 65 are living with two or more long term health conditions. Premature mortality are deaths that occur before average age of death and is a good high-level indicator of population health. Mortality rates are highest among those with cancer, cardiovascular disease and respiratory diseases. In 2016-18, the number of mortalities for these three causes of death was approximately 1,100; representing a figure better than London and England, which has been declining over the last decade.



## 2.3 Local healthcare services

- 2.3.1 There are a number of local healthcare services within the sites' surroundings as outlined in Table 1.
- 2.3.2 All of the GPs are accepting new patients, suggesting there is some spare capacity.
- 2.3.3 The nearest hospital to the Proposed Development is the University College Hospital located on Euston Road approximately 0.2 miles to the north east of the Site.

**Table 1 Health services within 1 mile of the development**

| Healthcare Service                        | Number within 1 mile of the Scheme |
|---|------------------------------------|
| Hospitals, including specialist hospitals | 16                                 |
| GP surgeries                              | 21                                 |

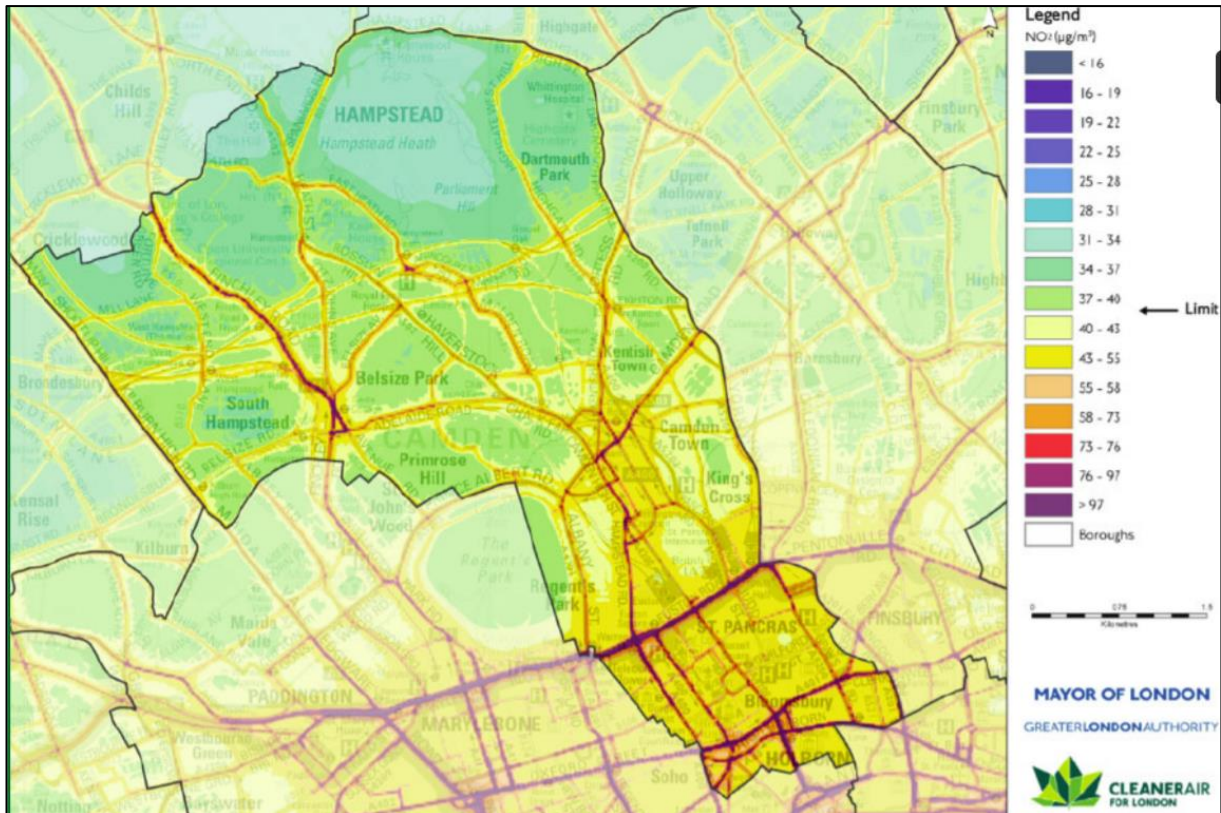
## 2.4 Environmental Influences

- 2.4.1 Environmental influences (such as housing, the living environment, crime and access to services) are known to impact certain health outcomes. For example, air pollution can cause respiratory conditions; a poor physical environment can lead to injuries and poor housing conditions can impact upon mental health.
- 2.4.2 Like much of London, air pollution in Camden is higher than the rest of the England, primarily due to the densely populated areas within the borough and consequent road traffic pollution.
- 2.4.3 According to the most recent JSNA for air quality (August 2019<sup>3</sup>), particulate matter in Camden meets national air quality objectives but not the World Health Organization guideline values; however, oxides of nitrogen remain problematic, with both annual and hourly mean objectives being breached. Camden has three automatic monitoring nitrogen dioxide NO<sub>2</sub> and particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>) stations, with all stations but the urban background station in Bloomsbury exceeding the annual mean objective of 40µg/m<sup>3</sup> or less in 2017.
- 2.4.4 NO<sub>2</sub> levels are generally higher in the south of Camden, around Bloomsbury and Euston, than the north of the borough around Hampstead and Dartmouth Park. The modelled map of annual mean NO<sub>2</sub> concentrations illustrated in Figure 7 below shows that mean NO<sub>2</sub> levels in Camden are closely associated with roads with heavy traffic flow.
- 2.4.5 Camden has achieved the AQS objective of an annual mean of 40µg/m<sup>3</sup> or less for both background and roadside PM<sub>10</sub>, and the objective of annual mean PM<sub>2.5</sub> levels below 25µg/m<sup>3</sup>, nonetheless, annual mean PM<sub>2.5</sub> remains above the WHO recommended limit of 10µg/m<sup>3</sup> adopted by Camden Council in January 2018.

<sup>3</sup> <https://www.camden.gov.uk/documents/20142/190750148/Air+Quality+JSNA+Camden+2019.pdf/87b69d12-73e1-b0c3-7942-43e4268b0ea1?t=1591701306959>

2.4.6 The borough has declared as an Air Quality Management Area (AQMA) within the borough in 2000 and as such the council has a Clean Air Action Plan in place outlining the measures to be taken to meet air quality objectives, including the more ambitious WHO standards for PM<sub>2.5</sub> pollution adopted in 2018.

**Figure 7 Air Pollution: NO<sub>2</sub> levels (Source: JSNA Air Quality)**



## 2.5 Open space and nature

2.5.1 Overall within the London Borough of Camden there is 2.7 ha of open space provision per 1,000 population. A total of 293 open spaces have been identified in Camden Borough by survey undertaken as part of the Open Space, Sport and Recreation study (2014)<sup>4</sup>. Of these, 105 spaces within the Borough (41%) were identified as representing open spaces of high quality and of high value to the community.

2.5.2 Camden has a relatively high quantity of public park provision for a London Borough, with some 1.8 ha of public parks per 1,000 / population, representing 77% of the identified open space areas, although the distribution of public park provision varies significantly between wards.

4

<https://www.camden.gov.uk/documents/20142/15817034/CD2.5+Open+Space+Sport+Recreation+Study+2014.pdf/4ce694bd-f292-b73f-d061-d0150ea3eb5a>



- 2.5.3 There are 28 open spaces which have play areas which fulfil the criteria associated with a Local Equipped Areas of Play (LEAP) and 5 open spaces that fully meet criteria for a Neighbourhood Equipped Area of Play (NEAP). In addition, 27 open spaces with 'Local Areas of Play' fulfil some of the criteria for a LEAP and could be classified as such if minor improvements were made to the play space.
- 2.5.4 On a ward level, the study identified that Bloomsbury ward has a total of 9.3ha of public open space, of which 5ha are public parks.

### **3.0 Challenges and Opportunities**

- 3.1.1 Table 3.1 highlights the health issues derived from the baseline assessment and identifies opportunities within the scheme design on Site shown on Figure 2 and with the potential for inclusion in the design to ensure improvements and enhancements to the health and wellbeing of the development area.



**Table 3.1 HUDU Rapid HIA Tool**

**Housing Quality and Design**

| Assessment criteria   | Relevant? | Details/evidence   | Potential health impact? | Recommended mitigation or enhancement actions |
|---|-----------|--|--------------------------|---|
| Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?                    | Yes       | The proposals are for E Use Class floorspace. The design of the building will comply with the relevant requirements of the Building Regulations and will endeavour to achieve BREEAM accreditation.<br><br>The DDA accessible WCs and lift will comply with all requirements of the Part M of the Building Regulations.  | Neutral                  | No further actions are considered required.   |
| Does the proposal address the housing needs of older people i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes? | N/A       | Not relevant to the Proposed Development   | Neutral                  | No further actions are considered required.   |
| Does the proposal include homes that can be adapted to support independent living for older and disabled people?  | N/A       | Not relevant to the Proposed Development   | Neutral                  | No further actions are considered required.   |
| Does the proposal promote good design through layout and orientation, meeting internal space standards?   | Yes       | The design of the proposals has been considered throughout various stages of the scheme, however, as the scheme is currently being submitted in outline, the final designs will be agreed at the reserved matters stages. It is assumed that the building will be designed in accordance with the relevant regulations.  | Positive                 | No further actions are considered required.   |
| Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?                           | N/A       | Not relevant to the Proposed Development   | Neutral                  | No further actions are considered required.   |
| Does the proposal contain homes that are highly energy efficient (e.g. a high SAP rating)?  | Yes       | The development is being designed to in accordance with the energy and carbon reduction initiatives. The building will be developed with low carbon materials and will target to achieve BREEAM and LEED accreditation. The building is proposed to be fuel free, with heating and cooling systems running on electricity only. The scheme will include an area photovoltaic panels within the plant area for on-site energy production.<br><br>Appropriate embodied carbon and energy assessments will be produced and agreed with Camden Borough at relevant planning stages. Where feasible, options for reducing operational water intensity and wastage on site will be considered. | Positive                 | No further mitigation is considered required. |



**Access of healthcare services and other social infrastructure**

| Assessment criteria   | Relevant? | Details/evidence  | Potential health impact? | Recommended mitigation or enhancement actions   |
|---|-----------|---|--------------------------|---|
| Does the proposal retain or re-provide existing social infrastructure?  | No        | The proposed development does not comprise the removal of the existing social infrastructure.   | Neutral                  | The proposed development is not considered to represent an impact on the existing social infrastructure |
| Does the proposal assess the impact on healthcare services?   | Yes       | There are 16 GP surgeries and 10 general and specialist hospitals located within 1km of the Site. An assessment of the existing capacity at these healthcare facilities has been undertaken and these were not identified to be operating over-capacity.<br><br>Although unlikely that the staff and users of the development will be registered at these facilities, given the existing capacity no potential effects are anticipated as a result of the proposed development. | Neutral                  | No further actions are considered required.   |
| Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?                         | No        | The Proposed Development does not include the provision of healthcare facilities and is not considered to represent a significant adverse effect on the existing services in the surrounding area.  | Neutral                  | No further actions are considered required.   |
| Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. schools, social care and community facilities? | N/A       | An assessment of the existing educational facilities was not required as the development proposals solely comprise employment and retail opportunities and therefore will not directly result in a capacity increase as such facilities.<br><br>The development will not result in effects on social care and community facilities, including libraries and praying facilities.<br><br>An assessment of the existing healthcare facilities is provided above.                   | Neutral                  | No further actions are considered required.   |
| Does the proposal explore opportunities for shared community use and co-location of services?   | Yes       | The development will provide flexible commercial space with shared facilities. It is proposed to provide retail units on this ground floor of the development. Although, the exact use of this area is not yet known, it is likely to comprise shops, cafes and restaurants.<br><br>The development also includes areas of public realm for the use of all staff members.   | Positive                 | No further actions are considered required.   |
| Does the proposal contribute to meeting primary, secondary and post 19 education needs?   | N/A       | Not relevant to the Proposed Development  | Neutral                  | No further actions are considered required.   |



**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 development proposes to widen, re-align and resurface the pavement at Howland Street. Landscaping enhancements are also proposed at street level with further provision of parklets and seating areas along Whitfield Street. All existing trees are proposed to be retained.   | Positive                 | No further mitigation is considered required. |
| In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces? | Yes       | As above  | Positive                 | No further actions are considered required.   |
| Does the proposal provide a range of play spaces for children and young people?                                    | N/A       | Not relevant to the Proposed Development  | Neutral                  | No further actions are considered required.   |
| Does the proposal provide links between open and natural spaces and the public realm?                              | Yes       | New high-quality paving will be provided as part of the development on Whitfield Street and Howland Street. The development also proposes to widen, re-align and resurface the pavement at Howland Street and provide parklets and tree planting along Whitfield Street. The proposed public realm will be interlinked around the building and will provide sheltered seating areas whilst allowing safe pedestrian flow. | Positive                 | No further actions are considered required.   |
| Are the open and natural spaces welcoming and safe and accessible for all?   | Yes       | The widening of the Howland Street pavement will allow safe pedestrian flow and crossing whilst improving the public realm experience in a busy shopping area. All areas of public realm proposed will be designed to be safe and welcoming and agreed accordingly at the later design stages.  | Positive                 | No further actions are considered required.   |
| Does the proposal set out how new open space will be managed and maintained?                                       | N/A       | Not relevant to the Proposed Development  | Neutral                  | No further actions are considered required.   |

**Air Quality, noise and neighbourhood amenity**

| Assessment criteria  | Relevant? | Details/evidence   | Potential health impact? | Recommended mitigation or enhancement actions  |
|--|-----------|--|--------------------------|--|
| Does the proposal minimize construction impacts such as dust, noise, vibration and odours? | Yes       | The existing Network Building is proposed to be demolished and redeveloped.<br><br>Reduction of dust, noise, vibration and odours during the demolition and construction phases will be minimized through the implementation of good practice measures throughout these phases. If required, a Demolition / Construction Environmental Management Plan (CEMP) will be prepared and agreed with Camden Borough prior to the start of the works. | Neutral                  | No negative health effects are anticipated in respect to construction activities as these will be reduced to a non-significant level where practical and therefore the effect is considered neutral. |



|   |     |   |         |  |
|---|-----|---|---------|--|
| Does the proposal minimize air pollution caused by traffic and energy facilities? | Yes | Construction traffic will be minimized through the implementation of good practice measures / CEMP and a construction travel plan if required. When operational, the development proposes to continue using the existing parking facilities at North Whitfield Street and will provide cycle storage for all users of the development at the basement level which consequently will not represent a significant effect in respect to air quality. | Neutral | No negative health effects are anticipated in respect to construction activities as these will be reduced to a non-significant level where practical.<br>Similarly, no effects during the operational phase are anticipated. |
| Does the proposal minimize noise pollution caused by traffic and commercial uses? | Yes | Construction traffic will be minimized through the implementation of good practice measures / CEMP and a construction travel plan if required. When operational, the development proposes to continue using the existing parking facilities at North Whitfield Street and will provide cycle storage for all users of the development at the basement level which consequently will not represent a significant effect in respect to noise.       | Neutral | No negative health effects are anticipated in respect to construction activities as these will be reduced to a non-significant level where practical.<br>Similarly, no effects during the operational phase are anticipated. |

**Accessibility and active travel**

| Assessment criteria  | Relevant? | Details/evidence  | Potential health impact? | Recommended mitigation or enhancement actions   |
|--|-----------|---|--------------------------|---|
| Does the proposal priorities and encourage walking (such as through shared spaces?)  | N/A       | Not relevant to the Proposed Development  | Neutral                  | No further actions are considered required.   |
| Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)? | Yes       | The development includes the provision of cycle storage. The proposals include showering and changing facilities for employees to encourage cycling to work.  | Positive                 | No further mitigation is considered required.   |
| Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?                | Yes       | New paving will be provided as part of the development on Whitfield Street and Howland Street. Howland Street will also be widened and re-aligned. This would consequently allow for the proposed public realm to be interlinked around the building whilst allowing safe pedestrian flow.<br><br>There are several cycle hire docking stations nearby with the closest being on Howland Street within 3 minutes' walk.   | Positive                 | The effects are considered positive in respect to health and wellbeing of the users of the site and therefore no further mitigation is considered required. |
| Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?                 | N/A       | No through site vehicle access is proposed and therefore no traffic calming measures are required.  | Neutral                  | No further actions are considered required.   |
| Is the proposal well connected to public transport, local services and facilities?   | Yes       | The Site benefits from excellent public transport links with a PTAL rating of 6b, which is the highest rating in Transport for London's classification.<br><br>The Site lies in close proximity to London Underground, London Overground and the National Rail services. Two underground stations are within 5 minutes' walk; these are Warren Street and Goodge Street. Numerous bus stops are located along Tottenham Court Road on the eastern part of the site. | Positive                 | No further mitigation is considered required.   |





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|---|-----|---|----------|---|
| 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 | Space for car parking is not provided as part of the development. However, existing parking spaces on North Whitfield Street will be retained.<br><br>Cycling spaces are proposed at basement level and will be access from Howland Street. | Positive | The lack of car parking provision and the availability of cycle storage will encourage walking and cycling by the users of the Proposed Development and represents a clear positive effect on health and wellbeing of site users. |
| Does the proposal allow people with mobility problems or a disability to access buildings and places?   | Yes | DDA accessible WCs and platform lifts will be provided to allow less able users located on all floors.  | Positive | No further mitigation is considered required.   |

**Crime reduction and community safety**

| Assessment criteria  | Relevant? | Details/evidence   | Potential health impact? | Recommended mitigation or enhancement actions |
|--|-----------|--|--------------------------|---|
| Does the proposal incorporate elements to help design out crime?   | Yes       | The Proposed Development will include efficient street lighting which will minimize the likelihood of crime as far as practical.   | Neutral                  | No further mitigation is considered required. |
| Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'? | Yes       | The Proposed Development includes the provision of CCTV and will be designed to Secure by Design standards   | Positive                 | No further mitigation is considered required. |
| Does the proposal include attractive, multi-use public spaces and buildings?                                       | Yes       | The areas of public realm will provide shared amenity space for all the tenants in the building, creating the opportunity for additional landscaping.  | Positive                 | No further mitigation is considered required. |
| Has engagement and consultation been carried out with the local community?   | Yes       | Invitations to meet with the stakeholders and present the exhibition material produced were issued at the start of September 2020. The exhibition material produced was presented to the stakeholders and an online public consultation on the week commencing the 14 <sup>th</sup> of September.<br><br>Further information in respect to the feedback received during the above consultation events and actions taken will be outlined within a supporting planning statement. | Positive                 | No further mitigation is considered required. |

**Access to healthy food**

| 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? | No        | Does not form a part of the proposal.  | Neutral                  | No further actions are considered required.   |
| Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?   | Yes       | The development includes the provision of retail floorspace at ground floor along Tottenham Court with commercial floorspace above. Although, not finalised at this stage, the retail units are likely to accommodate shops and cafes. | Positive                 | No further actions are considered required.   |



|   |     |   |          |   |
|---|-----|---|----------|---|
| Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area? | N/A | No hot food takeaways are proposed as part of the development | Positive | No further actions are considered required. |
|---|-----|---|----------|---|

**Access to work and training**

| 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       | Temporary construction opportunities will be provided during the short-term period of the demolition and refurbishment of the existing Site.<br><br>During the operational phase, employment opportunities will derive directly from the employment and retail floorspace provided as part of the development.               | Positive                 | No further actions are considered required.   |
| Does the proposal provide childcare facilities?  | No        | Does not form a part of the proposal.  | Neutral                  | No further actions are considered required.   |
| Does the proposal include managed and affordable workspace for local businesses?   | Yes       | The development is proposed to be flexible and adaptable to tenant requirements and has the potential to accommodate laboratory facilities in the knowledge quarter of the building on Level 2 to Level 6. Although, not known at this stage, it is likely that the commercial and retail floorspace will be leased locally. | Positive                 | No further actions are considered required.   |
| Does the proposal include opportunities for work for local people via local procurement arrangements?  | N/A       | Not known at this stage, but it is likely that any potential vacancies will be advertised locally and therefore is likely to directly contribute towards the local economy.  | Positive                 | No further actions are considered required.   |

**Social cohesion and lifetime neighbourhoods**

| Assessment criteria   | Relevant? | Details/evidence  | Potential health impact? | Recommended mitigation or enhancement actions |
|---|-----------|---|--------------------------|---|
| Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction? | Yes       | The existing building is irregular in shape and inflexible in its use, with Cypress Place interrupting the pedestrian flow on Howland Street. The development therefore proposes to have a single centralized core allowing efficient use of space, whilst extending the existing pavements around the building to increase the connections between the streets and consequently increase the capacity of pedestrian access. The development will also provide areas of public realm, including parklets and benches, which will encourage social interaction outside the building.<br><br>Access is being provided from two different parts of the main building (Howland and Whitfield Streets) with a reception area for all visitors and staff positioned on the ground floor of the building which will encourage some social interaction. | Positive                 | No further actions are considered required.   |



|  |     |  |          |   |
|--|-----|--|----------|---|
| Does the proposal include a mix of uses and a range of community facilities?     | Yes | The development comprises provision of employment and retail units as well as areas of public realm and therefore will include a range of community facilities, including shops and cafes.<br>Due to the prominent location of the development, any other facilities are considered to be easily accessible from the Proposed Development. | Positive | No further actions are considered required. |
| Does the proposal provide opportunities for the voluntary and community sectors? | N/A | Unlikely to form a part of the proposal. However, given the location of the development, such facilities are anticipated to be present within the vicinity of the Site.  | Neutral  | No further actions are considered required. |
| Does the proposal address the six key components of Lifetime Neighbourhoods?     | Yes | The Proposed Development will provide employment, retail and access facilities, whilst improving the existing public realm areas, increasing footfall and improving the relationship between the three busy streets of London.   | Positive | No further actions are considered required. |

**Minimise the use of resources**

| Assessment criteria   | Relevant? | Details/evidence   | Potential health impact? | Recommended mitigation or enhancement actions   |
|---|-----------|--|--------------------------|---|
| Does the proposal make best use of existing land?                     | Yes       | The current building within which the development is proposed sits within a prominent area, however, is not considered to be financially, socially and environmentally effective. The building has poor retail fronting on Tottenham Court Road and limited public realm / active frontage on Howland and Whitfield Streets.<br><br>The proposal therefore presents an opportunity to demolish and redevelop the existing building to the current national and regional standards, whilst providing employment and retail floorspace on important shopping streets of London, increasing the extent of active frontage and consequently improving the pedestrian flow and allows for provision of public realm areas.<br><br>The development also proposes to convert the existing basement car park, with provision of cycling spaces currently being proposed.<br><br>Cypress Place accessed from Howland Street is currently used as a service route, interrupting pedestrian flow on Howland Street and Maple Street. This is therefore to be used as a main access to the building, allowing Howland Street pavement to be widened to accommodate additional footfall and public realm. | Positive                 | No further actions are considered required.   |
| Does the proposal encourage recycling (including building materials)? | Yes       | Options for building processes and materials to reduce operational wastage, and local opportunities and schemes for recycling are currently being considered. These will be informed by the Waste Strategy prepared and agreed with Camden Borough.  | Positive                 | Waste Strategy to include options for recycling and reduction of waste produced by the development. |



|  |            |  |                 |  |
|--|------------|--|-----------------|--|
| <p>Does the proposal incorporate sustainable design and construction techniques?</p> | <p>Yes</p> | <p>The development is being designed to in accordance with the energy and carbon reduction initiatives. The building will be developed with low carbon materials and will target to achieve BREEAM and LEED accreditation. The building is proposed to be fuel free, with heating and cooling systems running on electricity only.</p> <p>Appropriate embodied carbon and energy assessments will be produced and agreed with Camden Borough at relevant planning stages. Where feasible, options for reducing operational water intensity and wastage on site will be considered.</p> <p>During the construction period, best practice measures will be implemented and followed which will reduce any potential effects associated with the use of resources to a non-significant level.</p> | <p>Positive</p> | <p>No further actions are considered required.</p> |
|--|------------|--|-----------------|--|

**Climate Change**

| Assessment criteria  | Relevant?  | Details/evidence   | Potential health impact? | Recommended mitigation or enhancement actions   |
|--|------------|--|--------------------------|---|
| <p>Does the proposal incorporate renewable energy?</p>   | <p>Yes</p> | <p>The development is currently at RIBA Stage 2 (Concept Design) and therefore the design of this is not yet fully finalised. However, options for on-site storage and heat recovery technologies have been considered and we been agreed, where feasible at the later planning stages of the development. The scheme will include an area photovoltaic panels within the plant area for on-site energy production.</p>                                  | <p>Neutral</p>           | <p>Options for renewable energy / carbon neutral technologies to be considered.</p>   |
| <p>Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?</p> | <p>Yes</p> | <p>The Proposed Development is being designed in compliance with the Building Regulations, relevant national and local legislations and accreditations. Appropriate embodied carbon and energy assessments will be produced and agreed with Camden Borough at relevant planning stages. These will include options for improve the resilience of the building to climatic changes and reducing carbon emissions once the development is operational.</p> | <p>Neutral</p>           | <p>Options for improving the resilience of the building to climatic changes will be provided within separate technical reports, such as Energy / Sustainability Strategies.</p> |
| <p>Does the proposal maintain or enhance biodiversity?</p>   | <p>Yes</p> | <p>Opportunities for achieving a biodiversity net gain are being considered.</p> <p>The development will not result in the removal of the existing trees, and will include additional green infrastructure, including tree planting and the provision of parklets.</p>   | <p>Positive</p>          | <p>No further mitigation is considered required.</p>  |
| <p>Does the proposal incorporate sustainable urban drainage techniques?</p>  | <p>Yes</p> | <p>Potential options for the provision of SuDS will be considered within the Drainage Strategy for the development.</p>  | <p>Neutral</p>           | <p>Options for the provision of SuDS to be considered within the Drainage Strategy</p>  |



### **4.0 Conclusion**

- 4.1.1 The Site is located within an area of mixed-commercial activity and would be consistent with the nearby uses. The Site is in line with the updated NPPF and Camden Borough policies, namely Policy C1; Policy C5 and Policy E5.
- 4.1.2 As outlined in Table 3.1 above and throughout the document, the Proposed Development would contribute to the overall local economy through generation of employment and retail floorspace and consequently indirectly and positively impact on the local health profile, including mental health; wellbeing and overall deprivation rates.
- 4.1.3 The development is located in a location which is close to local amenities, public transport and community facilities. The proposals also encourage walking and cycling by providing cycle spaces, areas of public realm and areas for community interaction which would directly benefit the health and wellbeing of the users and local residents.