



Regents Park Road Hotel, Camden

Health Impact Assessment

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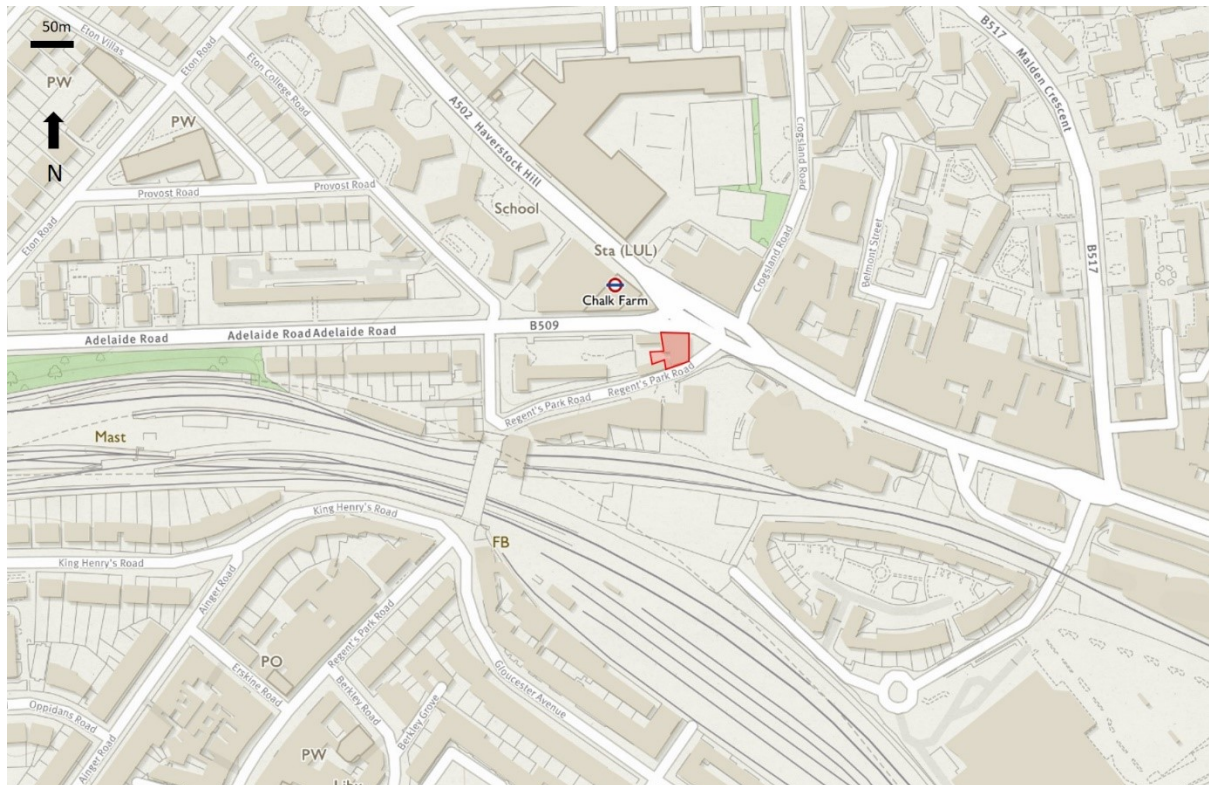
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INTRODUCTION

1. This Health Impact Assessment (HIA) has been prepared on behalf of Uchaux Limited (hereinafter referred to as the 'Applicant'), who is seeking detailed planning permission for the demolition of existing buildings and redevelopment of an area of land located within the London Borough of Camden (the LBC). The site is referred to as Regents Park Road Hotel, and is located at 155 - 157 Regents Park Road, Chalk Farm, NW1 8BB ('the site') (see Figure 1).
2. The current uses on the site is primarily office, along with three retail units at ground level comprising of the Crystal Clear retail unit (Use Class A1), the 'Bite Me Burger' restaurant (Use Class A3), a 'Dominos Pizza' takeaway (Use Class A5), and one residential unit on the top floor.

Figure 1. The Site – Planning Application Red Line Boundary



The Proposed Development

Quantum of Development

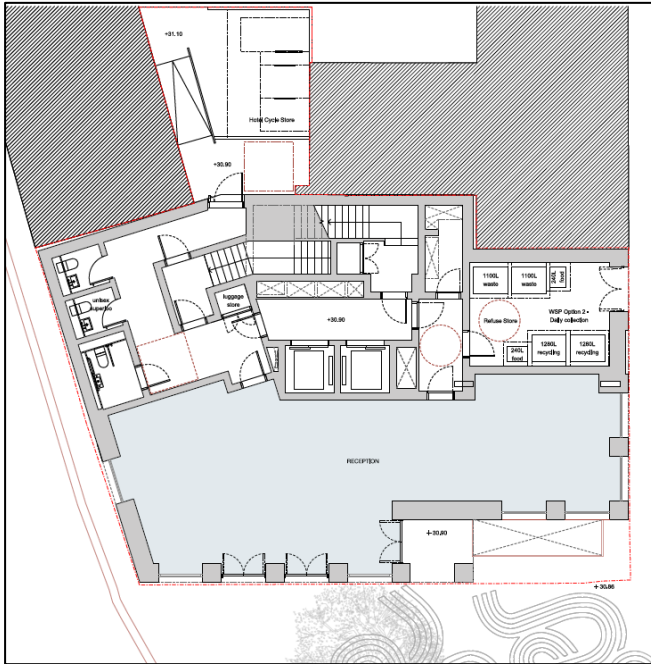
3. Detailed planning permission is being sought for the re-development of the site which will comprise the demolition of the existing buildings on-site and the construction of a building which is ground plus six-storeys in height and two levels of basement space, the Proposed Development has a maximum height of 57.070 m above ordnance datum. The proposed building comprises a 59-key hotel (Use Class C1 – 1,807m² Gross Internal Area (GIA)) development, and other works associated with the development (hereinafter referred to as the 'Proposed Development').

General Arrangement

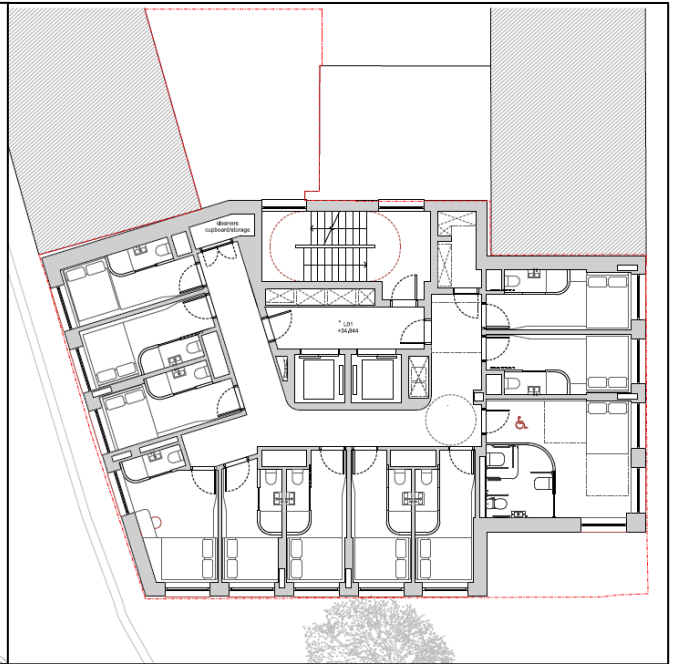
4. As discussed above, the Proposed Development is ground plus six-storeys in height, and provides two levels of basement (basement level 1 and basement level 2).
5. Hotel (Use Class C1) space is situated across lower ground floor/basement level 1 to sixth floor. Figure 2 presents the ground floor plan, a typical level hotel floor plan, and a basement floor plan, for context. Figure 3 represents the proposed building heights.

Figure 2. Proposed Development – Building Layouts (not to scale)

Ground Floor Plan



Typical Hotel Floor Plan (Floor 1)



Basement Floor Plan (Basement Level 1)

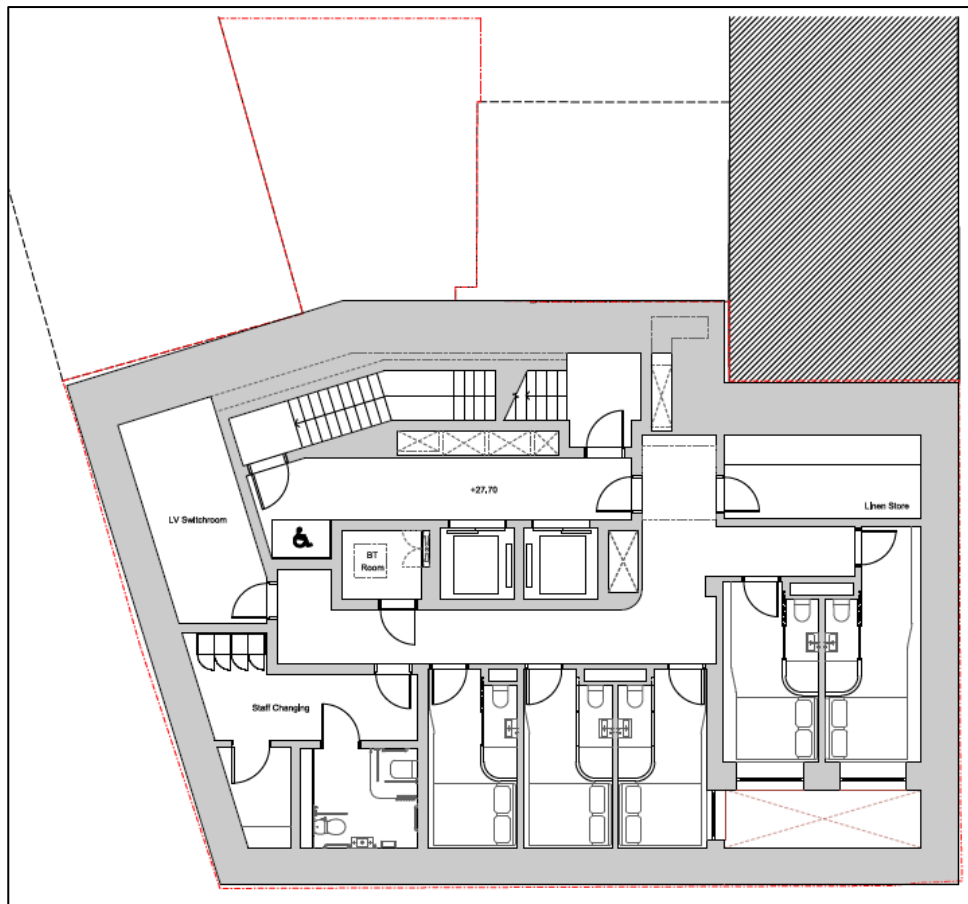
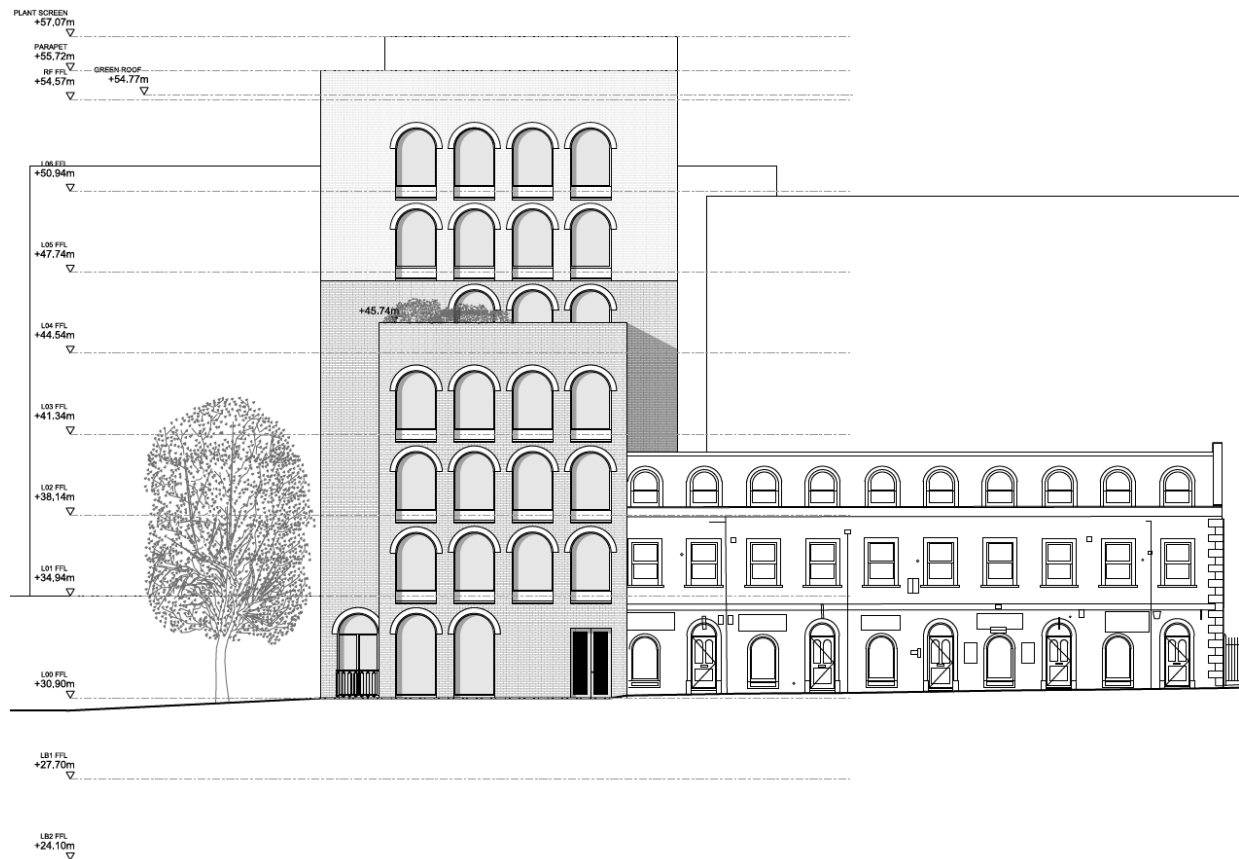


Figure 3. Proposed Development - Building Heights (north elevation) (not to scale)



Expected Population

6. As the Proposed Development does not include the provision of any residential dwellings no residential population will result from the Proposed Development.

Employment

Construction Employment

7. Employment generated during the demolition and construction phase is calculated using industry standard methodology (i.e. gross jobs years are calculated by dividing the total construction cost by the average gross value added (GVA) per head of construction workers within LBC).
8. Based on the above it is anticipated that the Proposed Development will support approximately 80 gross job years' worth of employment directly on site. This translates to an average of 55 construction workers situated on-site throughout the 18-month construction period¹.
9. It is standard to present construction employment figures as full-time equivalents (FTEs), on the assumption that 10 construction job years is equivalent to one construction FTE job. The construction of the Proposed Development would therefore be expected to support approximately 10 FTEs.

Existing and Proposed Employment

10. In terms of employable floorspace, the existing site provides:
 - 320m² Net Leasable Area (NLA) office (Use Class B1) space;
 - 59m² 'Crystal Clear' retail unit (Use Class A1);

¹ Volterra, (2019); *Employment and Skills Strategy prepared for the planning application.*

- 169m² NLA restaurant (Use Class A3) space; and
 - 113m² NLA takeaway (Use Class A5) space.
11. The Proposed Development provides a 59 key hotel.
12. The employment densities guide² recommends:
- One employee per 15-20m² NIA for retail (Use Class A1) space (also to be used for takeaway);
 - One employee per 15-20m² NIA for restaurant (Use Class A3) space (also to be used for takeaway);
 - One employee per 10-13m² NIA for office (Use Class B1a) space (dependent on sub-sector); and
 - One employee per 2 bedrooms for an up-scale hotel, the type deemed most relevant for the Proposed Development.
13. Based on the above, the existing building is anticipated to generate between 42 to 55 full-time equivalent (FTE) jobs and the Proposed Development is anticipated to generate approximately 30 FTE jobs when operational, equivalent to 35 jobs when taking into account part-time working patterns. There is therefore anticipated to be an overall reduction in employment on-site. This corresponds to an uplift directly on site of 12-25 FTEs.

Overview of this HIA

14. In accordance with the requirements of The London Plan³ Policy 3.2(c) (and consideration of the Draft 2020 London Plan⁴) and Policy C1 of LBC's Local Plan⁵, a HIA has been undertaken to help define and address any health issues in a systematic way. The methodology, baseline health context and health impact assessment are presented in this report.
15. In preparing this HIA, reference has been made to a number of data sources (these are referenced as relevant throughout this HIA) and to other standalone reports submitted as part of this planning application as relevant.

LEGISLATION AND PLANNING POLICY

16. A comprehensive review of relevant health related legislation and national, regional and local planning policy is provided in **Appendix A** of this HIA. The following legislative and planning policy documents are considered most relevant:
- The Localism Act 2011⁶;
 - The Health and Social Care Act 2012⁷;
 - The National Planning Policy Framework (NPPF) 2019⁸;
 - Planning Practice Guidance (PPG) (2014)⁹;
 - Fair Society, Healthy Lives (the Marmot Review) (2010)¹⁰;
 - Healthy Lives, Healthy People: our strategy for public health in England (2010)¹¹;

² Homes & Communities Agency, 2015. *Employment Densities Guide - Third Edition*.

³ Greater London Authority, (2016); *The London Plan – The Spatial Development Strategy for London, Consolidated with Alterations Since 2011*

⁴ Greater London Authority, (2020); *The Draft London Plan The Spatial Development Strategy for Greater London*. GLA.

⁵ London Borough of Camden (2018); *Local Plan*.

⁶ Her Majesty's Stationery Office, (2011); *Localism Act 2011*

⁷ Her Majesty's Stationery Office, (2012); *Health and Social Care Act 2012*

⁸ Department for Communities and Local Government, (2019); *National Planning Policy Framework*

⁹ Department for Communities and Local Government, (2014); *Planning Practice Guidance*

¹⁰ University College London, (2012); *Fair Society, Healthy Lives (the Marmot Review) 2010*

¹¹ Department of Health, (2010); *Healthy Lives, Healthy People: Our strategy for public health in England*

- NHS England's Challenging Health Inequalities Report (2016)¹²;
- The London Plan – The Spatial Development Strategy for London, Consolidated with Alterations Since 2011 (2016);
- The Publication London Plan (2020)¹³
- The Greater London Authority's (GLA) London Health Inequalities Strategy September 2018 (2018)¹⁴;
- GLA's Social Infrastructure Supplementary Planning Document (2015)¹⁵;
- Joint Strategic Needs Assessment ('JSNA') for Camden (online database)¹⁶;
- Camden Joint Strategic Needs Assessment, (2019);¹⁷
- London Borough of Camden Joint Health and Wellbeing Strategy refresh (2018)¹⁸;
- London Borough of Camden Planning Guidance: Planning for Health and Wellbeing (2018)¹⁹;
- London Borough of Camden Planning Guidance: Access for All (2019)²⁰; and
- London Borough of Camden Local Plan (2017).

METHODOLOGY

17. This HIA has been prepared in line with Policy 3.2(c) of The London Plan:
"The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA)."
18. This is endorsed in the local level through the LBC Local Plan Policy C1 which states that "...A) development to positively contribute to creating high quality, active, safe and accessible places" and "...B) A Health Impact Assessment must be submitted with all major development proposals".
19. The LBC require a HIA to accompany a planning application when:
 - The Proposed Development is of 10 or more new residential units; or
 - The Proposed Development is 1,000m² or more of additional commercial or visitor floorspace.
20. The Proposed Development comprises 1,807m² GIA of hotel (Use Class C1) floorspace, an HIA has been produced to assist the planning application.
21. The methodology for preparing this HIA is predominantly derived from the NHS Healthy Urban Development Unit (HUDU) (2017) Rapid Health Impact Assessment Tool²¹ and the NHS HUDU Healthy Urban Planning Checklist (2017)²².
22. The Rapid HIA Tool was designed to assess the likely health impacts of development plans and proposals. The Rapid HIA Tool is partly based on the World Health Organisation (WHO) publication by

¹² NHS England, (2016); *Challenging Health Inequalities Report – Support for CCGs*

¹³ Greater London Authority, (2020); Publication London Plan. Accessible online here: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/publication-london-plan>

¹⁴ Greater London Authority, (2018); London Health Inequalities Strategy 2018

¹⁵ Greater London Authority, (2015); Social Infrastructure SPD

¹⁶ London Borough of Camden (2019); Joint Strategic Needs Assessment online database. Accessible online: <https://www.camden.gov.uk/joint-strategic-needs-assessment>

¹⁷ London Borough of Camden (2019); Joint Strategic Needs Assessment for Camden 2019.

¹⁸ London Borough of Camden, (2019); Camden's Joint Health and Wellbeing Strategy refresh March 2019

¹⁹ London Borough of Camden, (2018); Planning for Health and Wellbeing. [URL: <https://www.camden.gov.uk/documents/20142/4833316/CPG+Planning+for+health+and+wellbeing+March+2018.pdf/f84469ed-8fdd-67fb-bfea-c948f94dfcb4>]

²⁰ London Borough of Camden, (2019); Access for All. [URL:

<https://www.camden.gov.uk/documents/20142/4823269/Access+for+All+CPG+March+2019.pdf/5cac0e80-e10b-e3fd-dbbf-89ad7b2b0d00>]

²¹ NHS Healthy Urban Development Unit, (2017) *Rapid Health Impact Assessment Tool*

²² NHS Healthy Urban Development Unit, (2017); *Healthy Urban Planning Checklist*

Hugh Barton and Catherine Tsourou, *Healthy Urban Planning* (2000)²³. This publication places emphasis on the importance of considering health and quality of life in urban planning, and refocusing urban planners on making health objectives central to the decision-making process.

23. The Rapid HIA Tool helps to identify determinants of health likely to be influenced by a specific development proposal. ‘Determinants of health’ are factors that have the most significant influence on the health of a population. The Rapid HIA Tool identifies the following 11 key determinants of health:
 1. Housing Quality and Design;
 2. Access to Healthcare Services and other Social Infrastructure;
 3. Access to Open Space and Nature;
 4. Air Quality, Noise and Neighborhood Amenity;
 5. Accessibility and Active Travel;
 6. Crime Reduction and Community Safety;
 7. Access to Healthy Food;
 8. Access to Work and Training;
 9. Social Cohesion and Lifetime Neighborhoods;
 10. Minimising the Use of Resources; and
 11. Climate Change.
24. As per the Mayor of London’s Social Infrastructure SPD²⁴ this HIA is a ‘Rapid HIA’, which is one of three types of HIA. This Rapid HIA is a *“more resource intensive process, involving a more focused investigation of health impacts and recommending mitigation and enhancement measures”*¹⁸. A ‘Desktop HIA’ and a ‘Full HIA’ are the other two types of HIA. A Desktop HIA is a simplified HIA which draws on existing knowledge and evidence to complete the assessment. A Full HIA involves comprehensive analysis of all potential health and wellbeing impacts and includes qualitative feedback from local residents and other stakeholders. For the site, a Rapid HIA is the most appropriate form of HIA. It provides sufficient information on the health baseline of the site and surrounding area to allow for a systematic consideration of the likely health implications of the Proposed Development. It is also considered to be proportionate to the Proposed Development in question and provides for opportunities to suggest mitigation and enhancement measures as appropriate to the findings of the HIA.
25. Rapid HIA are predominantly qualitative rather than quantitative assessments, due to the wide and diverse range of health determinants that need to be assessed. As detailed in the Rapid HIA Tool, impacts on health determinants have been categorised as:
 - Positive (+ve);
 - Negative (-ve);
 - Neutral (=); and
 - Uncertain (?)
26. Following on from the assessment of impacts of the Proposed Development on the key determinants of health, advice has been provided on measures to enhance health and wellbeing through the opportunities associated with the redevelopment of the site, and where necessary, to mitigate any potentially negative impacts.

²³ World Health Organisation, (2000); *Healthy Urban Planning* (ISBN: 113515936X)

²⁴ Greater London Authority, (2015); *Mayor of London’s Social Infrastructure Supplementary Planning Document*

Scope of this HIA

27. Due to the nature of the Proposed Development (a proposal comprising solely a hotel scheme with no residential elements) this HIA has considered the relevance of each health determinant with regards to end uses of the Proposed Development.
28. As the Proposed Development is not residential, a number of the health determinants set out above are not relevant to this site. Receptors introduced by the Proposed Development i.e. workers, will require limited (if any) access to social infrastructure and would also not require consideration with regards to housing-related determinants. As such these determinants are not considered for the Proposed Development and baseline conditions for these determinants have also not been provided.
29. A summary table detailing which health determinants are considered for each of the sites is included below as **Table 1**.

Table 1 Summary Table of the Scope of the HIA

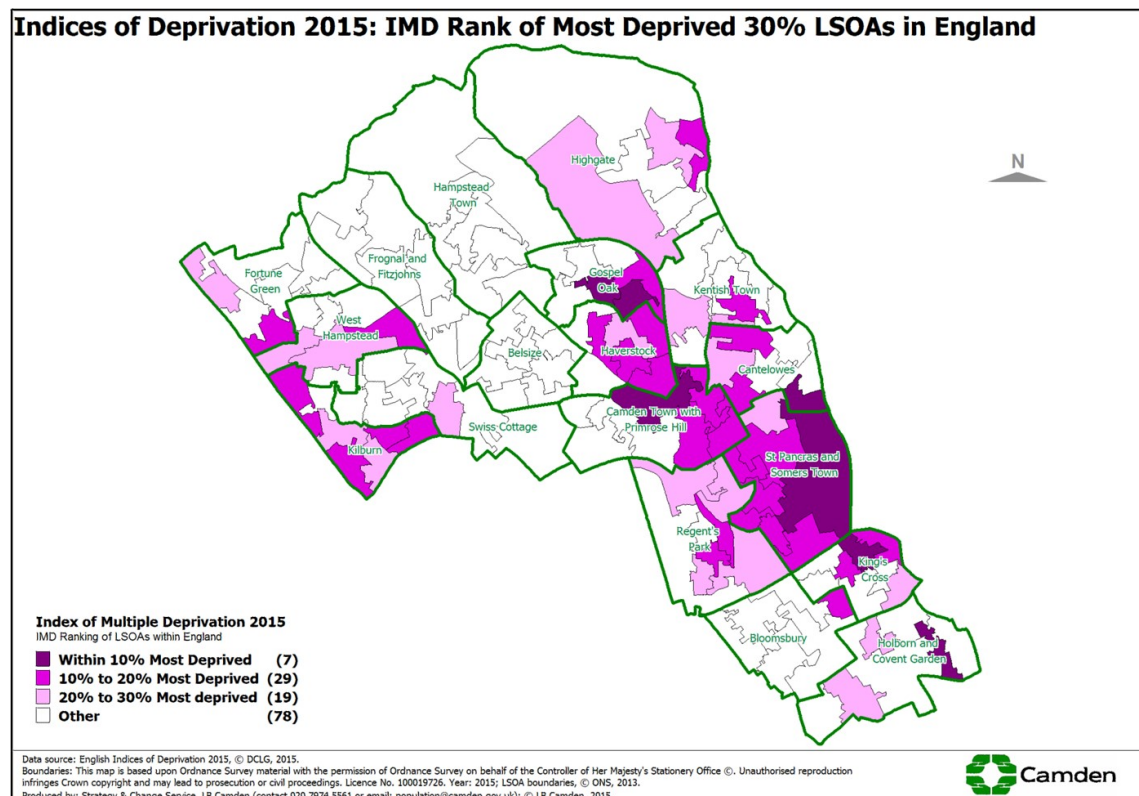
Health Determinant	'Scoped In' ✓ or 'Scope Out' ✗ of the HIA
1: Housing Quality and Design	✗
2: Access to Healthcare Services and other Social Infrastructure	✗
3: Access to Open Space and Nature	✗
4: Air Quality, Noise and Neighbourhood Amenity	✓
5: Accessibility and Active Travel	✓
6: Crime Reduction and Community Safety	✓
7: Access to Healthy Food	✓
8: Access to Work and Training	✓
9: Social Cohesion and Lifetime Neighbourhoods	✗
10: Minimising the Use of Resources	✓
11: Climate Change	✓

BASELINE REVIEW

Introduction

31. The site is located in Chalk Farm within the LBC, London, England. The LBC is made up of 14 wards, with the site located in the Haverstock Ward.
32. The LBC has an estimated resident population of 255,526 and is the 11th smallest borough in London. The population density within the LBC is 117.3 persons per hectare ²⁵.
33. The LBC is higher than the England average for deprivation with 25% of people being deprived compared to the average of 21.8% in England²⁶, and the health of people living within the borough is generally better than that compared with the England average. The only health indicators not considered to be 'better' or 'similar' to the England average is the diabetes diagnosis indicator, which is 56.3% for the LBC, compared with the England wide 78.0% (i.e. worse than England wide) and Tuberculosis (TB), which is 17.6% for the LBC and 9.9% England wide and New Sexually Transmitted Infections (STI) diagnoses which is 1,985 per 100,000 for the LBC and 851 per 100,000 England wise.
34. Life expectancy at birth is at 87 years for women (best in London), and 82.7 years for men which is higher than the average ages for both women (83.2 years) and men (79.6 years) within England.
35. Figure 4 below details the differences in deprivation within the borough based on national comparisons, using quintiles of the IMD 2015, shown by lower super output area (LSOA)²⁷. In addition, Figure 5 provides an overview of the site and surrounding context, in relation to transport links GPs and dentists.

Figure 4. Differences in Deprivation within the LBC.

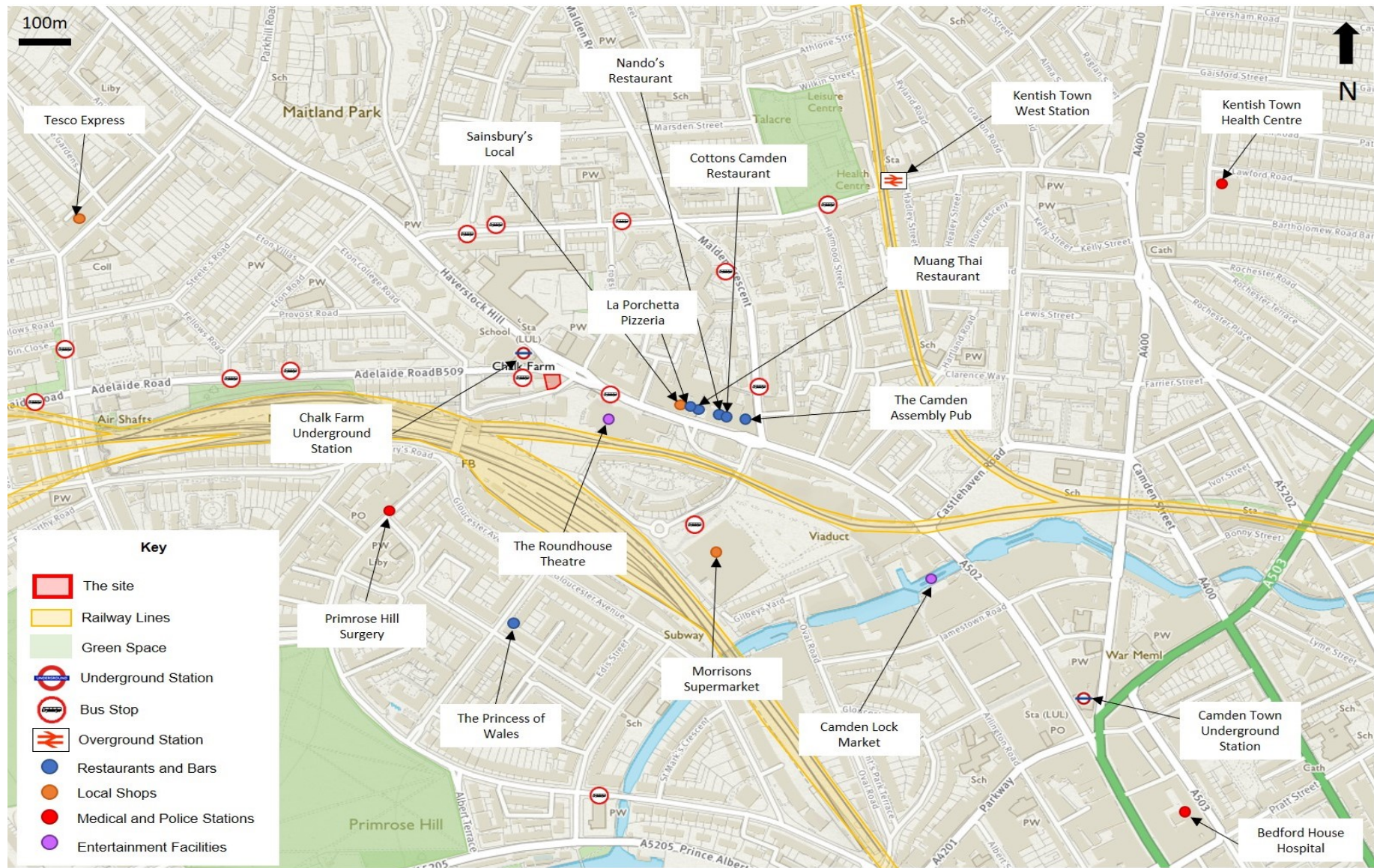


²⁵ This data has been sourced from 2011 Census data and 2016 population projections. London Datastore, 2018, Land Area and Population density, Ward and Borough. Accessed online 12.02.2021 [url: <https://data.london.gov.uk/dataset/land-area-and-population-density-ward-and-borough>]

²⁶ Public Health England (2019); Local Authority Health Profiles, Camden. Accessed online 12.02.2021. [url: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/par/E12000007/ati/102/are/E09000007/iid/91872/age/1/sex/4>]

²⁷ A Lower Super Output Area (LSOA) is an area designed to improve the reporting of small area statistics. It is a geographical area made of roughly 1,500 residents and 650 households

Figure 5. Site and Surrounding Context



Health Determinant 4: Air Quality, Noise and Neighbourhood Amenity

The NHS HUDU Planning for Health (2017), states that *“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.”*

36. Two of the main environmental factors affecting neighbourhood amenity are noise and air quality, which are covered in this health determinant section.
37. Air Quality is an important public health issue, particularly in London, where it was estimated by the Greater London Authority (GLA) that there were over 9,000 deaths attributable to long-term exposure to small particles and nitrogen dioxide (noting that there is some overlap in the numbers of deaths)²⁸.
38. In November 2002, the LBC designated an Air Quality Management Area (AQMA) across the whole Borough for nitrogen dioxide (NO₂) and particulate matter (PM).
39. The LBC routinely monitor the following pollutants: NO₂; PM₁₀, through four continuous air quality monitoring sites. The sites are located on Euston Road, Russell Square Gardens, Holborn and Swiss Cottage.
40. The LBC has a network of 19 diffusion tube ‘non-automatic’ monitoring sites which monitor long term trends of NO₂ across the LBC. Two of the diffusion tubes sites are co-located with Euston Road and Swiss Cottage automatic monitoring sites.
41. The national air quality objectives and European Directive limit and target values for the protection of human health identify 40 µg/m³ as the annual mean objective for NO₂ concentrations, 40 µg/m³ for PM₁₀ concentrations and 25 µg/m³ for PM_{2.5} concentrations.
42. Swiss Cottage monitoring station is located closest to the site (approximately 1.5km west of the site). The data for 2019 identifies that the annual mean concentration of NO₂ was recorded at 32 µg/m³ at Bloomsbury, 43 µg/m³ at Swiss Cottage and 70 µg/m³ at Euston Road. This is a general downward trend from the annual concentrations recorded in 2011: 50 µg/m³, 71 µg/m³ and 122 µg/m³ respectively. Overall, at most diffusion monitoring sites across the borough there is no significant trend either upwards or downwards; levels of NO₂ have remained fairly static. Euro VI/6 vehicle emissions standards have not delivered the forecast reductions in NO₂ levels in real world driving conditions that were predicted. The sale of diesel cars has seen a significant reduction over the last 18 months but the rental market for diesels remains buoyant and the number of vehicles on the road has continued to increase; this has hindered reductions in NO₂²⁹.
43. Figure 6 and Figure 7 below represents the 2011 annual mean concentrations of NO₂ and PM₁₀ in LBC respectively. Note that this data is not as up-to-date as the information presented within the paragraph above, as the source has not been updated since 2012, however the figures provide a good visual for air quality within the LBC, and identify that the concentrations of key pollutants are highest along the main artery roads in the borough³⁰.

²⁸ Kings College London, 2015, *Understanding the Health Impacts of Air Pollution in London*. Accessed online 12.02.2021 [url: https://www.london.gov.uk/sites/default/files/hiainlondon_kingsreport_14072015_final.pdf]

²⁹ London Borough of Camden, (2018); *Annual Status Report for 2017*.

³⁰ Greater London Authority, (2012); *Air Quality in Camden: A Guide for Public Health Professionals*

Figure 6. Annual Mean Concentration of NO₂ in the LBC in 2011



Source: Greater London Authority, (2012); Air Quality in Camden: A Guide for Public Health Professionals

Figure 7. Annual Mean Concentration of PM₁₀ in the LBC in 2011



Source: Greater London Authority, (2012); Air Quality in Camden: A Guide for Public Health Professionals

44. A vibration and baseline noise survey and assessment has been undertaken as part of the planning application for the Proposed Development.
45. Existing background noise levels and noise levels incident upon the site of the Proposed Development have been measured at representative locations and analysed. The survey consisted of both attended and unattended measurements completed between 19 July 2018 and 5 October 2018. The dominant noise sources affecting the site and the surrounding area are road traffic on Haverstock Hill, Adelaide Road and other surrounding roads and existing plant at existing commercial units at the site.
46. The noise levels measured during the surveys were identified as between 61 and 64 dBA Leq,T (the average A-weighted noise level exposure over a given time period, T) during the day-time and between 53 and 61 dBA Leq,T during the night-time. The lowest background noise level (noise level exceeded for 90% of the measurement period T, referred to as the 'background' noise level) was measured at between 44 and 52 dBA L90,15min during the day-time and between 40 and 41 dBA L90,15min during the night time.
47. Due to the close proximity of the London Underground Northern Line, vibration measurements were taken in the existing basement of the 155 Regent's Park Road building. The survey was carried out to determine the specific vibration levels associated with the Northern Line which runs beneath the property and is served by the Chalk Farm underground station opposite the site on Adelaide Road.
48. Measured vibration does values (VDVs) at the site are significantly below LBC criteria. Based on the assessment results and in light of BS 6472-1 criteria, 'adverse comment is not expected'.

Health Determinant 5: Accessibility and Active Travel

The NHS HUDU Planning for Health (2017) states that *“Convenient access to a range of services and facilities minimises the need to travel and provides greater opportunities for social interaction. Buildings and spaces that are easily accessible and safe also encourage all groups, including older people and people with a disability, to use them. Discouraging car use and providing opportunities for walking and cycling can increase physical activity and help prevent chronic diseases, reduce risk of premature death and improve mental health.”*

49. The site is bound to the north by Adelaide Road, to the east by Haverstock Hill and south by Regents Park Road, and to the west by residential uses.
50. The site has a TfL Public Transport Accessibility Level (PTAL) of 6a with good transport links such as Underground services, buses and Overground services. The closest tube station is Chalk Farm located 50m north-west of the site which provides Northern line services. Kentish Town West Overground Station is located 550m north-east of the site and provides regular services to Richmond, Stratford and Clapham Junction.
51. There are several bus stops located near the site providing services in both directions. The closest bus stop being Chalk Farm Stop (bus stop CA) and (bus stop CB) situated along Adelaide Road, providing regular services to Camden Town and White City.
52. Existing pedestrian and cycle facilities and routes are provided in the local area in all directions. Primrose Hill is 450m walking distance (7 minute walk away) from the site. Chalcot Square Gardens is located 320m walking distance (5 minute walk away) from the site. Castlehaven Open Space is located 640m walking distance away from the site (approximately 8 minute walk away).

Health Determinant 6: Crime Reduction and Community Safety

The NHS HUDU Planning for Health (2017) states that “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.”

53. Recorded crime peaked in Camden in 2002-03 with over 53,000 offences but fell to 28,400 by 2014-15. By 2017-18 overall recorded crime increased to 38,653 recorded offences, though has fallen in 2018-19 to 36,843 (-5%)³¹. By type, recorded offences were for: Theft (17,035; 43%); Violence Against the Person (6,761; 17%); Vehicle Offences (3,653; 9%); Burglary (3,245; 8%); Public Order Offences (2,071; 5%), Drugs (1,981; 5%); Robbery (1,964; 5%); Arson and Criminal Damage (1,609; 4%); Sexual Offences (671; 2%); Possession of Weapons (226, >1%); and all other offences (239; >1%).
54. Haverstock Ward has an above average rate of violent crime for London and is consistent with the crime rate for the LBC. Camden is the second most dangerous borough in London according to Metropolitan Police Figures and Haverstock is listed as having one of the highest crime rates in Camden and a hotspot for different types of crime. The closest police station to the site is Kentish Town Police Station located approximately 1km north-east of the site.
55. There is a potential for high number of rough sleepers in the area. This should be verified with the police advisers during the development of the security design for the development. The Proposed Development will take measures to design out crime with control measures (discussed further within the Impact Assessment section of this HIA).
56. The LBC have a ‘Community Safety’ section on their website, which provides links to community safety websites, relevant community safety contacts and a link to Camden’s Community Safety Partnership.
57. The Community Safety Partnership manages crime and public safety issues. It makes sure agencies work together with communities to tackle crime and increase community safety which are important concerns for residents and businesses. The priority is to tackle domestic violence, sexual violence, exploitation, youth violence, the impact of the night time economy on communities, antisocial behaviour, hate crime, preventing extremism and building community cohesion. The Community Safety Partnership is facilitated by the Community Safety Service who co-ordinate work on community safety in Camden. The Partnership includes people from Camden Council, Camden Police, NHS Camden, NHS Islington, London Probation Service, Camden Victim Support as well as other statutory and voluntary agencies.
58. The nearest fire station to the site is Kentish Town Fire Station located 1.25km north-east of the site.

³¹ Metropolitan Police Service: Notifiable Offences (financial year) to March 2019 via London Datastore.

Health Determinant 7: Access to Healthy Food

As detailed in the NHS HUDU Planning for Health (2017), “Access to healthy and nutritious food can improve diet and prevent chronic diseases related to obesity. People on low incomes, including young families, older people are the least able to eat well because of lack of access to nutritious food. They are more likely to have access to food that is high in salt, oil, energy-dense fat and sugar. 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.”

59. There are many local shops and supermarkets located within proximity of the site. The closest convenience store to the site is Sainsburys Local located approximately 130m east of the site. Morrisons supermarket is located approximately 300m south-east of the site and Tesco Express located approximately 700m north-west of the site. These stores sell a wide range of fresh and frozen food, and have fast food choices, which include healthy ranges such as salads and sandwiches.
60. There are limited ‘fast food’ chains within close proximity to the site with the closest being ‘Chalk Farm Grill’, located 50m north-west of the site. Additionally, ‘KFC’ is located approximately 770m south-east of the site. There are a number of restaurants, including ‘Nandos’ located approximately 250m east of the site. ‘Cottons Camden’, ‘La Porchetta Pizzeria’ and ‘Muang Thai’ are located approximately 260m to the east of the site.
61. There are pubs and bars within proximity to the site including but not limited to The Camden Assembly Pub and The Princess of Wales.

Health Determinant 8: Access to Work and Training

The NHS HUDU Planning for Health (2017) states that *“Employment and income is a key determinant of health and wellbeing. Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Works aids recovery from physical and mental illnesses.”*

62. Nearly three-quarters of Camden's residents are working age. On average, it is a relatively young, highly qualified, and diverse population. However, stark inequalities remain with people and families on low and middle incomes affected by high house prices and rental costs.
63. The Annual Population Survey for the year to December 2019 (latest) estimates that 51% of the working-age population of Camden were qualified to NVQ level 4 or above, below the average for London (60%) or Great Britain (44%).
64. Nearly half of the working age population in LBC are qualified to degree level or above; over 60% are employed, three-quarters in professional roles.
65. The median gross pay of people working in Camden is the 7th highest in London and 8th in the UK: median gross annual pay for full-time employees working in Camden was £34,525 in 2020, compared with £32,533 for London. Average pay decreased in Camden in 2019-2020 by 2.1%, however London increased by 4.2%³².
66. The overall employment rate in Camden is relatively low and the economic inactivity rate relatively high in comparison with London and England & Wales (this is supported by findings from the 2011 Census which confirms Cam-den's employment rate is lower than London or England & Wales, amongst the lowest in London, but consistent with Central London boroughs). Although, students living in the borough account for much of this, but some Camden residents still face significant barriers to accessing employment.
67. Fewer Camden residents are in work as a proportion of the working age population nationally. The Annual Population Survey estimated the Camden employment rate at 72.6% in 2018 Q4, 6.6 percentage points higher than the same quarter last year, but 1.8 percentage points lower compared to Central London comparators³³.
68. There has been a 20% growth in Camden residents in employment between 2001 to 2011, from 91,900 to 110,200 and a 10% growth in the number of people being employed in Camden from 227,700 to 250,000.
69. Work experience opportunities are provided by the LBC for those aged between 14 and 19 years, as well as work related and learning opportunities, which are managed by the London Borough of Camden Council and are advertised on their website.

³² ONS Annual Survey of Hours and Earnings, 2020.

³³ ONS Annual Population Survey, 2018 Q4 (Camden accuracy +/- 4.2%).

Health Determinant 10: Minimising the Use of Resources

The NHS HUDU Planning for Health (2017) states that, *“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.”*

70. The LBC is one of seven boroughs in the North London Waste Plan³⁴, along with the London Boroughs of Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest. Together the seven boroughs have developed the North London Waste Plan (DPD), which sets out the waste management targets for the individual boroughs and allocates sites suitable for waste handling and management across all of the seven boroughs.
71. At 31.1% in 2018/19, the LBC ranked 20th for recycling rate from households of all 32 of the London boroughs. The average recycling rate across the London boroughs was 34.1%, with Bexley recording the highest recycling rates of 54.1%. The average recycling rate for London was lower than the average rate for England, which was 43.5%³⁵.
72. Through the London Environment Strategy, the Mayor is seeking to make London a zero waste city with no biodegradable or recyclable waste sent to landfill by 2030 and by aiming to achieve 65% recycling from London’s municipal waste, this will be achieved through a 50% recycling rate from LACW by 2025 (Policy 7.2.1) and 75% from business waste by 2030 (policy 7.2.2).
73. The LBC are working to improve their recycling rates, the Camden Local Plan includes Policy CC5 ‘Waste’ which is to *“aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031”* and *“make sure that developments include facilities for the storage and collection of waste and recycling..”*.

³⁴ North London Waste Plan (2015); Joint Waste Plan for the London Boroughs of Camden, Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest

³⁵ DEFRA (2020); Household Waste Recycling Rates, Borough [Accessed online 07/06/20 URL: <https://data.london.gov.uk/dataset/household-waste-recycling-rates-borough>]

Health Determinant 11: Climate Change

The NHS HUDU Planning for Health (2017) states that *“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.”*

74. UKCP18³⁶ gives ‘probabilistic projections’³⁷ for a number of atmospheric variables. UKCP18 projections consider the local climate effects arising from four different emissions scenarios. Probabilistic projections give a range of possible climate change outcomes and their relative likelihoods i.e. unlikely, likely or very likely ranging across 10th to 90th percentiles. The RCP8.5 emissions scenario has been used (with the 50th percentile data), as it represents the most reasonable emissions scenario with regards to climate policy, land use and technological development.
75. Future UKCP18 climate change projection data for the 2080s (covering the years 2070 – 2099) has been reviewed in relation to the London area, this is in order to determine the likely climatic conditions in the areas surrounding the Proposed Development in the future. Note that the 2080s (which cover the years 2070 – 2099) have been reviewed, as the indicative lifespan of building structures is 50 years³⁸, and therefore the 2080s (covering the years 2070 – 2099) have been identified as the most likely ‘end-years’ of new development, and therefore present a worst-case scenario when considering impacts on new development from climate change.
76. A review of the key climatic variables within the UKCP18 projections (for the London area) has identified that:
 - By the 2080s, the mean average air temperature is projected to increase by +2.94 °C annually, to 13.39 °C. The mean daily maximum temperature is projected to increase by +3.1°C, and the mean daily minimum temperature is projected to increase by +2.89°C;
 - Annual average precipitation is due to decrease by 0.53%, with a +16.23% increase in the winter average precipitation, and a -26.31% decrease in the summer average precipitation. The autumn and spring averages have small decreases of between 5.1 and 5.25%;
 - Wind annual average wind speed (measured in meters per second (m s⁻¹)) is projected to marginally decrease in speed in the 2080s, by -0.065m s⁻¹; and
 - Total cloud cover is projected to decrease annually by 6.22%, this decrease in total percentage cloud cover is most prevalent in the summer average, where the summer average is due to decrease in the 2080s by 15.21%. There is projected to be a marginal increase (of 0.93%) in the average winter cloud cover.

³⁶ UK Climate Projections (UKCP18). Accessed Online 07.06.2020 [URL: <http://ukclimateprojections.metoffice.gov.uk/>]

³⁷ Probabilistic projections give a range of possible climate change outcomes and their relative likelihoods i.e. unlikely, likely or very likely ranging across 10th to 90th percentiles.

³⁸ British Standard BS EN 1990:2002, (2002); Eurocode – Basis of Structural Design

Health Impact Assessment

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
1. Housing Quality and Design					
As outlined above this Health Determinant has been scoped out of the HIA as the Proposed Development does not provide residential floorspace.					
2. Access to Healthcare Services and Other Social Infrastructure					
As outlined above this Health Determinant has been scoped out of the HIA as the Proposed Development does not provide residential floorspace.					
3. Access to Open Space and Nature					
As outlined above this Health Determinant has been scoped out of the HIA as the Proposed Development does not provide residential floorspace.					
4. Air Quality, Noise and Neighbourhood Amenity					
4.1	Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes	<p>During construction works associated with the Proposed Development, standard management controls will be in place to minimise construction impacts from dust, noise, vibration and odours. These standard measures have been included within the Construction Logistics Plan (CLP), which has been prepared and will be submitted in support of the planning application. Measures include, but are not limited to:</p> <ul style="list-style-type: none"> Measures to minimise noise, dust and vibration levels e.g. the dampening down of hard surfaces will reduce the dispersal of dust generated during construction activities; The site will be registered to the Considerate Constructors Scheme (CCS) - one of the Applicant's commitments commits all live construction sites registered with CCS to achieve a minimum score of 38 points in each site audit; Any site person receiving a concern or complaint from adjacent properties or passing pedestrians shall refer the matter immediately to the site manager, who will record the fact and refer the matter to the management team who will subsequently carry out an investigation; The site will follow best practice measures in accordance with GLA guidance for air quality, which will be agreed with the LBC prior to the commencement of demolition/construction works; The prohibition of any unauthorised burning of material on-site; Use of dust-suppressed tools for all operations; and 	= Neutral	Preparation of the CLP, submitted in support of the planning application, with dust, noise, vibration and odour mitigation measures included.

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
			<ul style="list-style-type: none"> Ensuring that all construction plant and equipment is maintained in good working order and not left running when not in use. <p>Properly controlled construction works, compliant with Local Authority requirements and using best practicable mitigation / noise control measures are unlikely to cause significant adverse health effects.</p> <p>During construction works associated with the Proposed Development, standard management controls will be in place to minimise construction impacts from noise and vibration.</p>		
4.2	Does the proposal minimise air pollution caused by traffic and energy facilities?	Yes	<p>Emissions from operational traffic associated with the Proposed Development are not expected to significantly affect local air quality as the Proposed Development is effectively 'car-free'. The site is located close to many public transport amenities, cycling and pedestrian links. This promotion of an active lifestyle will help to minimise emissions caused by traffic flows from future users of the Proposed Development, as guests are being actively encouraged to utilise other forms of transport.</p> <p>The air quality assessment report provided by Cundall (as the air quality specialists) has identified that the change in pollutant concentrations attributable to traffic emissions during the operation phase of the Proposed Development (i.e. impacts on local air quality) are negligible and not significant for all pollutants, and therefore, no mitigation is required. The impacts on annual mean NO₂ concentrations at all existing receptors are negligible; and the predicted PM₁₀ and PM_{2.5} concentrations are below national objectives.</p> <p>The Proposed Development is expected to be air quality neutral in terms of transport emissions, as such, no specific mitigation measures will be required to offset the emissions. However, the following mitigation strategy has been proposed by the Project Transport Consultant WSP and this will assist in further minimising any transport related impacts:</p> <ul style="list-style-type: none"> Short-stay and long-stay cycle parking spaces will be provided in line with local and regional policy to further encourage the use of sustainable travel; A Framework Travel Plan, prepared for the planning application by WSP, identifies an appropriate package of measures aimed at promoting sustainable travel, with an emphasis on promoting alternatives to cars; and A marketing strategy will be employed with the aim of increasing sustainable travel by the visitors and employees of the Proposed Development: a travel pack, detailing information on local public transport options, route maps, and information on nearby amenities and services. <p>The Proposed Development will aim to minimise site-related emissions:</p> <ul style="list-style-type: none"> Heating and cooling to the Proposed Development will be provided by a refrigerant based VRF heat pump system; 	+ve	N/A

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
			<ul style="list-style-type: none"> External condensers will be mounted at roof level these will be coupled with buffer vessels to store the hot water; The systems will be powered by electricity; and Additionally, domestic hot water will be provided by an air source heat pump system. <p>A backup diesel sprinkler pump will be selected to provide power during emergency situations. This is likely to be tested on a weekly basis for a short duration (e.g. 30 mins) and it is anticipated that emissions from this equipment will not be significant.</p>		
4.3	Does the proposal minimise noise pollution caused by traffic and commercial uses?	Yes	<p>The Proposed Development is unlikely to cause a significant increase to noise from traffic in the area. Traffic in the area, notably on Haverstock Hill Road, is relatively heavy and as such a significant existing source of noise pollution. Any increase in traffic is anticipated to have negligible impact.</p> <p>The Proposed Development has an appropriate glazing strategy for dwellings and hotel rooms, which will minimise noise intrusion from traffic and commercial uses.</p> <p>Internal noise criteria for the scheme, currently based on BS 8233:2014 criteria, are still likely to be met as it is understood that ventilation will be provided by mechanical means. The Proposed Development's building envelope acoustic performances can in principle be maintained by suitably selected building constructions of the walls, roof, ventilation products and glazing systems.</p> <p>The acoustic design associated with the Proposed Development will be designed closely with the MEP design, so as to ensure that external building services noise emission limits, as required by the local authority, will be achieved.</p> <p>The Proposed Development will be designed in line with relevant standards, guidance and Local Authority requirements for dwellings. At this stage, criteria from BS 8233:2014 has been used for hotel dwellings. More onerous criteria for hotel rooms may be sought by the hotel operator.</p>	=Neutral	N/A above and beyond that incorporated during the design of the Proposed Development
5. Accessibility and Active Travel					
5.1	Does the proposal prioritise and encourage walking (such as through shared spaces?)	Yes	<p>The long-stay cycle parking for employee use will be located in the courtyard at the rear of the building, and short-stay cycle spaces will be located in the public realm in front of (to the east) of the Proposed Development.</p> <p>The Proposed Development is car-free (with the exception of a single blue badge bay). This will encourage trips to be made by public transport, walking and cycling. The pedestrian network in the vicinity of the site is of a good standard and benefits from both formal and informal street crossings and convenient access to local facilities and services. It is anticipated that over 95% of trips to the Proposed Development will be by foot. These shared open spaces, cycle parking and good local pedestrian facilities encourage walking and outdoor activities.</p>	+ve	N/A

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
5.2	Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	Yes	<p>The Proposed Development provides secure and covered cycle storage and facilities for the hotel:</p> <ul style="list-style-type: none"> 4 long-stay spaces including 1 accessible long-stay space for the hotel are provided in the courtyard at the rear of the building; and 4 short-stay spaces for the hotel are provided in the public realm area in front of the building main entrance. <p>Shower and lockers will be provided on the basement level. These spaces will encourage workers to cycle, thereby reducing reliance on cars.</p>	+ve	N/A
5.3	Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	Yes	<p>The Proposed Development sits on a junction and next to cycle paths and pedestrian crossings. The new landscape design and the positioning of short-stay cycle parking on the public realm in front of the building will facilitate the walk and cycle strategy.</p>	+ve	N/A
5.4	Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	No	<p>The Proposed Development has limited highway proposals. There is no traffic calming within the vicinity of the site, and there is not a need for it to be implemented as part of the scheme, as there is limited traffic impact as a result of the Proposed Development.</p>	= Neutral Effect	NA
5.5	Is the proposal well connected to public transport, local services and facilities?	Yes	<p>The site is bound to the north by Adelaide Road, to the east by Haverstock Hill and south by Regents Park Road, and to the west by residential uses.</p> <p>The site has a TfL Public Transport Accessibility Level (PTAL) of 6a with good transport links such as Underground services, buses and Overground services. The closest tube station is Chalk Farm located 50m north-west of the site which provides Northern line services. Kentish Town West Overground Station is located 550m north-east of the site and provides regular services to Richmond, Stratford and Clapham Junction.</p> <p>There are several bus stops located near the site providing services in both directions. The closest bus stop being Chalk Farm Stop (bus stop CA) and (bus stop CB) situated along Adelaide Road, providing regular services to Camden Town and White City.</p> <p>Existing pedestrian and cycle facilities and routes are provided in the local area in all directions.</p> <p>Thus, the Proposed Development will connect the new users of the site with public transport, and as such will have a potential positive impact on the connectivity of the Proposed Development with the local transport network.</p> <p>With regards to accessibility to local conveniences, there are many local shops and supermarkets located within proximity of the site. The closest convenience store to the site is Sainsburys Local located approximately 130m east of the site. Morrisons supermarket is located approximately 300m south-east of the site and Tesco Express located approximately 700m north-west of the site.</p>	+ve	N/A

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
5.6	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	<p>The Proposed Development is car-free, with the exception of provision of a single blue badge parking space for the hotel use, as per Camden Planning Guidance.</p> <p>By providing no standard car parking spaces, hotel visitors and employees are encouraged to use sustainable modes of travel. The car-free nature of the development will restrict travel by private car for all users with the exception of blue badge users.</p> <p>The Framework Travel Plan, prepared for the planning application by WSP, identifies an appropriate package of measures aimed at promoting sustainable travel, with an emphasis on promoting alternatives to cars.</p> <p>The Travel Plan will be a 'living document' requiring monitoring, regular reviews and revisions to ensure it remains relevant to the site and those using the site and provides continuous improvements for its duration. A Travel Plan Coordinator (TPC) will be appointed to take responsibility for the management of the plan, and for ensuring its delivery. The TPC role for the site will be fulfilled by an appointed consultant or by the Proposed Developments management team.</p> <p>A marketing strategy will be employed with the aim of increasing sustainable travel by the visitors and employees of the Proposed Development, in the form of a travel pack, detailing information on local public transport options, route maps, and information on nearby amenities and services. Visitor parking is not permitted on-site.</p> <p>Short-stay and long-stay cycle parking spaces will be provided in line with local and regional policy to further encourage the use of sustainable travel.</p> <p>These arrangements would significantly restrict travel by private car and therefore encourage the use of sustainable forms of transport. Further encouragement of the use of public transport, walking and cycling is set out in the Travel Plan.</p>	+ve	Implementation of the Framework Travel Plan as a pre-commencement condition
5.7	Does the proposal allow people with mobility problems or a disability to access buildings and places?	Yes	<p>The building and approaches have been designed to Approved Document M and BS 8300:</p> <ul style="list-style-type: none"> • Users of the Proposed Development will access and be guided through the building and the site, without discrimination or limitation; • Six of the 59 hotel rooms are designed as being fully compliant with Category 2 Wheelchair M4(3) wheelchair adaptable dwellings. This includes but is not limited to, the building's approach, level access, corridor widths, turning circles, passenger lifts, stairs, balustrades and handrails, and refuge points; • Where guests may wish to use stairs, all staircases have been designed with handrails, to provide support; • One blue-bay parking space is provided within the Proposed Development; and • Surface textures have been considered with both wheelchair users and guide dogs in mind. 	+ve	N/A

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
6. Crime Reduction and Community Safety					
6.1	Does the proposal incorporate elements to help design out crime?	Yes	<p>Alongside the application Cundall's Crime Impact Assessment is being submitted, the assessment provides recommendations for the design layout, including:</p> <ul style="list-style-type: none"> Design pedestrian routes to be integrated and easy to direct and intuitive through the application of inclusive design and natural surveillance; Develop a zoned approach to the security of the development, with clear demarcation between private and public spaces to control permitted circulation around the Proposed Development; Develop physical measures to physically control movement of people into areas; and Ensure that the landscape and lighting strategy coordinate in order to avoid conflict between lighting and vegetation. 	+ve	N/A
6.2	Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	Yes	<p>As outlined in 6.1 the Proposed Development will incorporate a number of measures to design out crime, consequently through the provision of these mitigation measures the development will make site users (guests and employees) feel secure.</p> <p>The Proposed Development does not include a residential dwelling and therefore will not result in a 'gated community'.</p>	+ve	N/A
6.3	Does the proposal include attractive, multi-use public spaces and buildings?	Yes	<p>The Proposed Development includes communal areas, such as the ground floor lobby, which is conducive to communal gatherings and encourages interaction amongst users, and the landscaping strategy provides usable publicly accessible areas, at ground level outside the entrance to the Proposed Development.</p> <p>The Proposed Development has been designed to be an attractive building, improving on the aesthetic appearance of the existing building on-site.</p>	=Neutral	
6.4	Has engagement and consultation been carried out with the local community?	Yes	<p>A Statement of Community Involvement has been prepared by Kanda Consulting in support of the planning application³⁹.</p> <p>Activities undertaken as part of the consultation process include the following:</p> <ul style="list-style-type: none"> Personalised emails were sent to political stakeholders and local community stakeholder groups to invite them to discuss the proposals and to inform them of the upcoming public consultation; Individually addressed letters were sent to 196 local residents and businesses in the area surrounding the site in January 2021 to introduce the 	+ve	N/A

³⁹ Kanda Consulting, (2019); Statement of Community Involvement, prepared in support of the planning application.

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
			<p>proposed redevelopment and to provide details of the consultation process and how the residents can get involved;</p> <ul style="list-style-type: none"> A postal consultation booklet with detailed information regarding the proposals was sent to 1,758 residential and business addresses in January 2021. This included information and visuals relating to the proposals, a freepost feedback form and a link to the consultation website where residents could also view the development information online; A dedicated project email and phone line were included in all consultation materials. All enquiries were responded to in a timely manner; A dedicated project website 155regentsparkroad.com, with detailed information relating to the proposal, was created to host the online consultation, this was necessary due to the restrictions imposed as a result of Covid-19. This website included a detailed overview of the proposals and enabled residents to complete an online feedback survey relating to the proposals for the development; The project team undertook a detailed briefing session with local ward councillors from Haverstock Ward and Camden Town with Primrose Hill Ward via video conferencing in January 2021. Feedback was collected via an online survey and the freepost feedback form accompany the postal exhibition booklet. A total of 32 feedback forms were received, including 3 online submissions and 29 postal submissions. <p>The Statement of Community Involvement demonstrates that public consultation has been undertaken and has:</p> <ul style="list-style-type: none"> Informed local residents, businesses, councilors and other stakeholders about the redevelopment aspirations for the site; and Helped gain a full understanding of local views of the proposal and engaged with the local and wider community. 		
7. Access to Healthy Food					
7.1	Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers' markets?	Yes	There are no plans for any allotments or community farms.	-ve	N/A

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
7.2	Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	N/A	The Proposed Development will not provide any retail floor space.	N/A	N/A
7.3	Does the proposal avoid contributing towards an overconcentration of hot food takeaways in the local area?	Yes	The Proposed Development will not provide any retail floor space, and the existing takeaway (Use Class A5), restaurant (Use Class A3) and retail (Use Class A1) unit on site will be replaced.	+ve	N/A
8. Access to Work and Training					
8.1	Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes	<p>As discussed within Section 1 of this HIA, the Proposed Development will support approximately 85 gross job years' worth of employment directly on site during the construction phase. This translates to an average of 55 construction workers situated on-site throughout the 18-month construction period.</p> <p>When operational, the Proposed Development is anticipated to generate approximately 30 FTE jobs when operational, equivalent to 35 jobs when considering part-time working patterns.</p> <p>As outlined within Volterra's Employment and Skills Strategy, the Applicant is proposing to set a local employment target for the construction phase, based on targets that have been set in previous LBC planning applications and targets outlined in employment & skills policies for other Central London Forward boroughs. Based on this, the Applicant intends to use reasonable endeavours to achieve a minimum of 20% of construction employees to go to local LBC residents. This would equate to 17 construction jobs over the course of the entire construction period. This represents a fourfold increase over what might naturally be expected given commuting patterns in this sector.</p> <p>If this local labour target is not fulfilled wholly by Camden residents, the Applicant will undertake reasonable endeavours to ensure that the target is met by residents of the Central London Forward boroughs, in line with LBC policy.</p> <p>In order to further develop the skills of local residents, the Applicant will commit to providing a number of apprenticeship positions through the demolition and construction phase. In line with LBC policy, this would see the creation of 1 apprenticeship during the construction for every £3 million of construction cost, generating 3 apprenticeships.</p> <p>The Applicant has committed to a partnership with the Roundhouse Trust, located in the Roundhouse arts and entertainment venue nearby. The partnership will aim to build on the successes achieved by the Roundhouse Trust in encouraging diversity by providing young people experiencing social or economic disadvantage with employment skills and personal development experience. The Applicant will promote</p>	+ve	N/A

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
			<p>apprenticeships offered through the Roundhouse Trust to ensure disadvantaged local residents are best placed to access the opportunities offered by the charity.</p> <p>The Applicant will additionally commit to paying at least the London Living Wage (LLW) to all directly employed full and part-time employees, and will promote the commitment to the LLW for all sub-contractors during both the construction and end-use phases.</p>		
8.2	Does the proposal provide childcare facilities?	Yes	The Proposed Development will not provide any childcare facilities.	-ve	N/A
8.3	Does the proposal include managed and affordable workspace for local businesses?	No	The Proposed Development will not provide any retail, commercial or office floor space. In place of the direct provision of affordable workspace within the Proposed Development, the Applicant will provide circa 300 m ² of affordable workspace in the proposed adjacent Roundhouse development or as part of the work-life scheme in the vicinity to be secured as part of the Section 106 agreement.	+ve	N/A
8.4	Does the proposal include opportunities for work for local people via local procurement arrangements?	Yes	<p>See Details/Evidence to Question 8.1.</p> <p>In addition, the Applicant has committed to undertaking reasonable endeavours to adhere to LBC's Local Procurement Code, outlined within Employment Sites and Business Premises (March 2018) Camden Planning Guidance, whereby a target is set for 10% of total procurement value to come from within the local area supply chain.</p>	+ve	N/A
9. Social Cohesion and Lifetime Neighbourhoods					
As outlined above this Health Determinant has been scoped out of the HIA as the Proposed Development does not provide residential floorspace.					
10. Minimising the use of Resources					
10.1	Does the proposal make best use of existing land?	Yes	The proposals seek to develop the currently underutilised building which is in need of refurbishment to deliver a new hotel. There are significant socio-economic benefits associated with the new hotel including the proposed job creation and local spending.	+ve	N/A
10.2	Does the proposal encourage recycling (including building materials)?	Yes	<p>The Proposed Development will implement a CEMP during the demolition and construction phases. This CEMP will outline construction management measures, including measures specific to waste. The CEMP will be implemented during the demolition and construction works, as a component of the Demolition and Construction Management Plan. This will include the management of wastes in accordance with the Waste Hierarchy. As part of the hierarchy, the emphasis is firstly on waste avoidance and minimisation, and subsequently recycling, with landfill the final (and least desirable) option.</p> <p>During construction works, waste can arise from a number of activities and actions (such as the over-ordering of materials). This plan will implement a range of measures to manage and minimise the creation of waste, and encourage recycling:</p> <ul style="list-style-type: none"> There will be no stockpiling of construction materials on site; 	+ve	<p>Preparation of a CEMP as a pre-commencement condition.</p> <p>Implementation of an operational Refuse, Recycling and Servicing Strategy</p>

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
			<ul style="list-style-type: none"> Construction materials will be stored appropriately, so as to prevent damage e.g. from adverse weather conditions; and Construction materials required will be carefully quantified so as to help prevent overordering of materials. <p>Once the Proposed Development is completed and occupied, waste recycling (from operational waste arisings) will be encouraged, via the provision of waste recycling bins. This will be managed by a Refuse, Recycling and Servicing Strategy.</p>		
10.3	Does the proposal incorporate sustainable design and construction techniques?	Yes	<p>The Proposed Development will incorporate sustainable design and construction techniques.</p> <p>The Proposed Development has dedicated cycle parking which is compliant with local and regional parking standards and encourages adoption of sustainable and green travel.</p> <p>In line with the above philosophy, the application of low energy lighting and passive improvements to building fabric are proposed.</p> <p>The primary method for heating, cooling and providing hot water uses air source heat-pump technology to limit pollution from fossil fuel boilers whilst maximising the heat / cooling output for energy used. Ensuring the GLA target is met.</p> <p>The Proposed Development has been designed to minimise CO2 emissions associated with their operational energy consumption.</p> <p>Construction materials will be selected with sustainability in mind, with the aim to efficiently use of natural resources and consider potential environmental impacts.</p>	+ve	N/A
11. Climate Change					
11.1	Does the proposal incorporate renewable energy?	Yes	<p>The Proposed Development includes LZC (low and zero carbon) technologies, air source heat-pump provisions. This includes the use of air source heat-pump for providing hot water. Thus, eliminating the need for fossil-fuel and supporting the decarbonising of the grid supplied electricity.</p> <p>Photo-voltaic panels (PV) have been considered but due to the limited available roof space this technology is not deemed suitable for the Proposed Development.</p>	+ve	N/A
11.2	Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?	Yes	<p>The Proposed Development has been designed with passive energy reduction measures in place, and include thermal insulation, air tightness, maximising daylighting, and passive solar gain.</p> <p>The hotel will include variable refrigerant flow system air source heat pumps to provide simultaneous space heating and cooling, with central Air Handling Units (AHU) with heat recovery to provide the fresh air requirements to the building.</p> <p>The design has considered the impacts of varying temperatures and included measures to manage these variations.</p>	+ve	N/A

	Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
			The Proposed Development provides new planting areas in the landscaped front square and terraced areas.		
11.3	Does the proposal maintain or enhance biodiversity?	Yes	A new accessible north facing terrace is proposed as amenity space for the hotel occupants. This will be planted and landscaped providing a biodiverse green roof. The proposed landscaping measures will provide an improvement upon the existing situation, thus enhancing existing biodiversity on-site.	+ve	
11.4	Does the proposal incorporate sustainable urban drainage techniques?	Yes	The proposed surface water drainage strategy for the site has been developed to utilise sustainable drainage techniques (SuDS) to attenuate surface water at source and reduce the risk of downstream flooding of the Thames Water sewer network in the local area. The Proposed Development provides a biodiverse green roof within the amenity terrace.	+ve	N/A

Conclusions

77. This Rapid HIA has been prepared in line with relevant legislation, policy and guidance. A review has identified information relating to the following 11 key determinants of health:
 1. Housing Quality and Design;
 2. Access to Healthcare Services and other Social Infrastructure;
 3. Access to Open Space and Nature;
 4. Air Quality, Noise and Neighborhood Amenity;
 5. Accessibility and Active Travel;
 6. Crime Reduction and Community Safety;
 7. Access to Healthy Food;
 8. Access to Work and Training;
 9. Social Cohesion and Lifetime Neighborhoods;
 10. Minimising the Use of Resources; and
 11. Climate Change.
78. The health impacts relating 7 of the above 11 health determinants have been assessed against the Proposed Development, in the context of the site location, using the 'HUDU Rapid Health Impact Assessment Matrix', determinants 1, 2, 3, and 9 were scoped out as the Proposed Development did not include residential dwellings and therefore these determinants were not relevant to the non-residential uses proposed. Impacts on the future workers of the Proposed Development, and the local community, have been identified and are detailed in the Assessment Matrix of this HIA.
79. The primary health benefits identified, include but are not limited to:
 - The new 59-key hotel (Use Class C1);
 - The removal of the existing fast-food takeaway unit (Use Class A5) on-site;
 - Well-designed accessible spaces within the Proposed Development, that cater for the needs of the disabled as well as for the able-bodied;
 - Improvement of the existing site, with better quality spaces provided;
 - The inclusion of L2C technologies and air source heat-pump provisions for the hotel This includes the use of air source heat-pump for providing hot water. Thus, eliminating the need for fossil-fuel and supporting the decarbonising of the grid supplied electricity;
 - The provision of short-stay and long-stay cycle parking spaces in line with local and regional policy to further encourage the use of sustainable travel;
 - The creation of jobs which will be associated with the hotel and retail uses proposed in the development; and
 - The jobs that will be created during the construction phase, and when the Proposed Development is complete and occupied.
80. A number of measures have been developed as part of the Proposed Development to promote health and wellbeing which include: complementary First-Aid training of security operatives on-site during the construction works; implementation of a construction logistics plan and a Construction Environmental Management Plan to reduce adverse health risks from demolition and construction activities.

Appendix A Policy and Legislation Summary

The Localism Act 2011

1. The Localism Act 2011 is an Act to “make provision about the functions and procedures of local and certain other authorities; to make provision about the functions of the Commission for Local Administration in England; to enable the recovery of financial sanctions imposed by the Court of Justice of the European Union on the United Kingdom from local and public authorities; to make provision about local government finance; to make provision about town and country planning, the Community Infrastructure Levy and the authorisation of nationally significant infrastructure projects; to make provision about social and other housing; to make provision about regeneration in London; and for connected purposes.”
2. In short, the Act enshrines the ‘neighbourhood plan’, a new layer of development plan. Neighbourhood Development Plans are initiated by communities and become part of the Local Plan and the policies contained within them are then used in the determination of planning applications. Neighbourhood Development Orders and Community Right to Build Orders allow communities to grant planning permission either in full or in outline for the types of development they want to see in their areas.

Health and Social Care Act 2012

3. “An Act to establish and make provision about a National Health Service Commissioning Board and clinical commissioning groups and to make other provision about the National Health Service in England; to make provision about public health in the United Kingdom; to make provision about regulating health and adult social care services; to make provision about public involvement in health and social care matters, scrutiny of health matters by local authorities and co-operation between local authorities and commissioners of health care services; to make provision about regulating health and social care workers; to establish and make provision about a National Institute for Health and Care Excellence; to establish and make provision about a Health and Social Care Information Centre and to make other provision about information relating to health or social care matters; to abolish certain public bodies involved in health or social care; to make other provision about health care; and for connected purposes.”
4. The Health and Social Care Act 2012 was introduced following the Health and Social Care Bill 2011. The Act was established in order to promote and improve the NHS.

National Planning Policy Framework (2019)

5. The National Planning Policy Framework (NPPF), which was adopted in February 2019, sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF provides a framework for which local people and their respective councils can produce their own local and neighbourhood plans, which are relevant to the needs and priorities of their communities.
6. The achievement of sustainable development is a key theme within the NPPF, and the three key themes to sustainable development (economics, social and environmental) are present throughout the NPPF. The NPPF states that the following objectives are required from the planning system when considering the social dimension of sustainable development: “...to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”.
7. Section 8 of the NPPF revolves around ‘Promoting Healthy and Safe Communities’. This section of the NPPF states that:

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighborhoods and active street frontages;
- are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and
- enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

Planning Practice Guidance (2014)

Health and Wellbeing

8. The Planning Practice Guidance (PPG) is an online resource which collates planning guidance on various topics into one place. The PPG was launched in March 2014.
9. Of relevance to Health and Wellbeing (updated 2017), the PPG states that “Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making...”
10. The PPG provides guidance on a range of health and wellbeing issues, including: the links between health and planning, and how to effectively incorporate these into local plans, development proposals etc.; how planning can help create a healthier food environment; who the main health organisation are that a local authority should contact; how the health and well-being and health infrastructure should be considered in planning decision making; and what a healthy community is.

The London Plan – The Spatial Development Strategy for London, Consolidated with Alterations Since 2011

11. The London Plan was updated in March 2016 from the previous 2011 London Plan. The London Plan is the strategic plan for London with sets out the framework for the development of London over the next 20-25 years. Health and wellbeing is a constant theme throughout the London Plan Policies of specific relevance to health and wellbeing include:

‘Policy 3.1 Ensuring equal life chances for all’

12. This policy aims to strengthen the already existing diversity of London, and to ensure that Londoners from all backgrounds have equal opportunities in life. The key means to achieving this aim include: includes helping people, groups or communities to find common grounds on how they can develop and sustain cohesive communities; making London more ‘age-friendly’; and understanding the key barriers to success, and individuals reaching their potential, so as to tackle these issues.

‘Policy 3.2 Improving Health and Addressing Health Inequalities’

13. This policy details that the Mayor will work in conjunction with the NHS in London, boroughs and the community and voluntary centre to improve health and reduce health inequalities. Part D of the policy states that “*New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.*”

‘Policy 7.1 Lifetime Neighbourhoods’

14. As stated in Paragraph 7.4A of this policy of the London Plan:

“Three principles have been developed to help frame the concept of lifetime neighbourhoods as places where people at all stages of their lives:

- can get around – neighbourhoods which are well-connected and walkable;
 - as far as possible, can have a choice of homes, accessible infrastructure and services, places to spend time and to work, with a mix of accessible and adaptable uses; and
 - belong to a cohesive community which fosters diversity, social interaction and social capital.”
15. This policy advises that development should be designed with social and community infrastructure in mind, and that development should help reinforce or enhance the character, legibility permeability of the neighbourhood.
 16. This policies in Chapter 7 of The London Plan provide the context within which the targets set out in other chapters of the Plan should be met.
 17. Other London Plan policies relevant to the HIA include, but are not limited to: ‘Policy 3.5 Quality and Design of Housing Development’; ‘Policy 3.9 Mixed and Balanced Communities’; ‘Policy 3.16 Protection and Enhancement of Social Infrastructure’; ‘Policy 4.12 Improving Opportunities for All’; and ‘Policy 7.2 An Inclusive Environment’.

The New London Plan – Publication London Plan December 2020

18. The Mayor has formally approved the new London Plan, the ‘Publication London Plan’. It has been prepared to address the Secretary of State’s directions of the 13th March 2020 and 10th December 2020 to the Intend to Publish plan. It was sent to the Secretary of State for his consideration on 21st December 2020. On the 29th January 2021, the Secretary of State replied confirming he is content for the Publication London Plan to be published. The Mayor will now proceed with the final steps to publish the final London Plan. On publication it will become the Spatial Development Plan for London and part of the statutory Development Plan for Greater London. As the Plan is due to be adopted this year, the HIA has given weight to the draft policies outlined within the Plan. The key ones of which are outlined below.

Policy GG1 Building strong and inclusive communities

19. This policy puts onus on those involved in planning and development to seek to ensure that London continues to generate a wide range of economic and other opportunities that everyone is able to benefit from, as well as ensuring that good quality services, public places and open space, buildings and streets are designed well, to promote and build strong and inclusive communities.

Policy GG3 Creating a healthy city

20. This policy states that “To improve Londoners’ health and reduce health inequalities, those involved in planning and development must:
 - A) Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way ...;
 - B) Promote more active and healthy lives for all Londoners...;
 - C) Use the Healthy Streets Approach to prioritise health in all planning decisions;
 - D) Assess the potential impacts of development proposals and development plans on the mental and physical health and wellbeing of communities ...for example through the use of Health Impact Assessments;
 - E) Plan for improved access to and quality of green spaces, the provision of new green infrastructure, and space for play, recreation and sports;
 - F) Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.

G) Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.”

Fair Society, Healthy Lives (the Marmot Review) (2010)

21. The Marmot Review, published in 2010, was undertaken by Prof. Sir Michael Marmot in 2008. The Review is an independent review aimed at proposing the most cost-effective evidence-based strategies for reducing health inequalities in England. The Review had four main tasks:

- “Identify, for the health inequalities challenge facing England, the evidence most relevant to underpinning future policy and action
- Show how this evidence could be translated into practice
- Advise on possible objectives and measures, building on the experience of the current PSA target on infant mortality and life expectancy
- Publish a report of the Review’s work that will contribute to the development of a post- 2010 health inequalities strategy”

22. The review states that reducing health inequalities will require action on six policy objectives:

- “Give every child the best start in life
- Enable all children young people and adults to maximise their capabilities and have control over their lives
- Create fair employment and good work for all
- Ensure healthy standard of living for all
- Create and develop healthy and sustainable places and communities
- Strengthen the role and impact of ill health prevention”

Healthy Lives, Healthy People: Our strategy for Public Health in England (2010)

23. This document focuses on public health in England, with regard to its current state, and the commitment to protecting the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest.

24. This document was produced in response to The Marmot Review, and adopts its framework for tackling the wider social determinants of health.

25. As stated in paragraph 7 of the document, “...People living in the poorest areas will, on average, die 7 years earlier than people living in richer areas and spend up to 17 more years living with poor health. They have higher rates of mental illness; of harm from alcohol, drugs and smoking; and of childhood emotional and behavioural problems. Although infectious diseases now account for only 1 in 50 deaths, rates of tuberculosis and sexually transmitted infections (STIs) are rising and pandemic flu is still a threat.”

Camden’s Joint Strategic Needs Assessment (JSNA) 2015/16

26. The JSNA is a continual process of pulling together a wide range of information about the health and social care needs of people in Camden. JSNA projects focus on individual topics, such as Population (e.g. life expectancy), particular health problems (e.g. cardiovascular disease), unhealthy lifestyles (e.g. smoking), sexual health (e.g. STI’s) and specific groups of the population with additional need (e.g. people with learning disabilities).

27. The findings of JSNA work are published online through the council website by the health and wellbeing board, which summarises JSNA findings, factsheets and needs assessment reports.

28. The JSNA provides key information as a basis for the improvement of existing services and planning

of future services, with the ultimate aim of improving health and wellbeing of people in the LBC.

Camden's Joint Health and Wellbeing Strategy Refresh (2019)

29. The LBC's Joint Health and Wellbeing Strategy aims to build on the achievements and aspiration of Camden's Health and Wellbeing Board. The Strategy is split into various chapters with carefully selected actions, which will be reviewed on an annual basis: 'Healthy Weight, Healthy Lives', which recognises the impacts of obesity and the need to maintain a healthy lifestyle; 'Live Well', which tackles the four main unhealthy behaviours of smoking, overconsumption of alcohol, poor diet and lack of physical activity, and poor emotional and mental wellbeing; and 'Age Well', which recognises the disparity between the number of people in the borough living longer with a diminished quality of life.

Camden Local Plan (2017)

30. The Local Plan was adopted by the LBC. The Council's Local Plan sets the policies and guidance for the development of the LBC up to 2031, and identifies where the main developments will take place, and how places within the borough will change, or be protected from change.
31. The policies set out in the Local Plan follow the approach of the presumption in favour of sustainable development and show how it is expressed locally. The Plan states that the Council will ensure that planning applications that accord with policies in the adopted Local Plan and the London Plan will be approved without delay, unless material considerations indicate otherwise.
32. The Local Plan has three inter-related strategic objectives of 'reducing inequality and improving health and wellbeing', 'creating conditions for and harnessing the benefits of economic growth' and 'investing in communities and ensuring sustainable neighbourhoods'. These three strategic objectives form the basis of the Local Plan Strategic Vision, which describes what the borough will be like in 2031.
33. Policy C1 Health and Wellbeing of the Local Plan discusses that the council will require; A) "developments to positively contribute to creating high quality, active, safe and accessible places" and B) "major development schemes to include a Health Impact Assessment must be submitted".

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