Euston Area Plan Update Sustainability Appraisal Scoping Report
Summer 2021

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1. Introduction

1.1 This document is a Scoping Report for the Sustainability Appraisal (SA) which is being prepared for the Update to the Euston Area Plan (EAP). The EAP is an Area Action Plan which was adopted in 2015 and it provides a framework to guide development above the new Euston Station and in the surrounding area up to 2031. The EAP was jointly developed by Camden Council, the Greater London Authority and Transport for London. Camden Council adopted the Plan in January 2015 as a Local Plan document. The Mayor of London also adopted the Plan as supplementary planning guidance to the London Plan in January 2015.

1.2 It is a legal requirement for all local plans to be reviewed at least every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). As part of this review, it was noted that a number of key factors have changed since adoption in 2015 which triggered an update to the Euston Area Plan. These include Camden adopting the Camden Local Plan in 2017, the High Speed Rail (London – West Midlands) Act 2017 being passed ("the HS2 Act") authorising construction of the first phase of HS2, Lendlease being appointed as Master Development Partner, updates to emerging plans for Euston Station by Network Rail and changes to Borough wide priorities including the declaration of a Climate emergency in 2019.

1.3 The background information for the EAP and the capacities identified were based on the station design constraints and information from 2013. This is now nearly 8 years out of date and designs have evolved, and in some cases constraints, funding, deliverability and requirements, have changed. Parts of the EAP have been implemented and the update will reflect these changes. Following the Royal Assent for the HS2 bill achieved in February 2017, 215 homes were earmarked for compulsory purchase and demolition. Planning permission was granted for the erection of replacement homes for HS2 lost homes across 8 plots on the Regents Park Estate in December 2015 (ref 2015/3076/P). Camden have since built 106 new homes on 8 sites across Regents Park Estate.

1.4 The EAP is being updated in order provide greater clarity, where possible, on unresolved uses at the time of adoption and to ensure that the evidence base for key parts of the plan are revised to reflect the most up to date information, constraints and opportunities. Further information on the review of the Euston Area Plan and the decision for it to be partially updated can be found here.

1.5 Part of the process for preparing the Update to Euston Area Plan, there is a statutory requirement to undertake a Strategic Environmental Assessment (SEA) and Sustainability Appraisal. These procedures have been combined into a single appraisal process entitled 'Sustainability Appraisal' or 'SA', for which the overall aim is to ensure that the plan contributes to the achievement of sustainable development. The Scoping Report and Sustainability Appraisal for the 2015 EAP was produced

using the policy framework of the Camden Core Strategy, Development Policies and Site Allocations DPDs (Development Plan Documents), which were adopted by Camden in October 2008. The Scoping Report (dated September 2012) and Sustainability Appraisal for the 2015 Euston Area Plan can also be found in Appendix 1.

1.6 This Scoping report is the first stage of the sustainability appraisal process which involves setting the context, identifying the baseline and producing sustainability objectives, namely setting the scope for the appraisal process. This report includes a review of relevant policies, plans and programmes that relate to the Euston area; information on the baseline characteristics of the local area; consideration of the sustainability issues / problems and develops a framework for the future stages of the sustainability appraisal process, including the identification of sustainability objectives.

1.7 This Scoping Report explains:

- Why a sustainability appraisal of the Euston Area Plan update is required;
- The policies, plans and programmes relevant to it;
- The baseline information for the various indicators used to appraise the DPD;
- The sustainability appraisal process and requirements; and
- How the information obtained is taken forward in the SA and the update to the Euston Area Plan.

1.8 The UK Government (through the Environmental Assessment of Plans and Programmes Regulations 2004) requires the contents of the scoping report to be consulted on with the following agencies:

- The Environment Agency
- Natural England
- Historic England

1.9 Comments are sought on this Scoping Report to ensure that the SA will be comprehensive and robust.

2. Why is a Sustainability Appraisal required?

Legal Requirements

2.1 In Section 19 of the Planning and Compulsory Purchase Act 2004, local planning authorities (LPAs) are required to produce Sustainability Appraisals with the preparation of any new or updated Development Plan Documents. Section 39 of the Act requires that the LPA preparing a plan must do so "with the objective of contributing to the achievement of sustainable development". A Sustainability Appraisal ensures that the potential environmental effects are given full consideration alongside social and economic issues. It is a tool used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives.

2.2 Paragraph 32 of The National Planning Policy Framework (NPPF) states that local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets relevant legal requirements. The Appraisal should demonstrate it has "*addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant*

adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)".

2.3 In preparing a Local Plan Document, LPAs are required to carry out an environmental assessment, known as a Strategic Environmental Assessment (SEA). It is essential that Sustainability Appraisals meet all the requirements of the *Environmental Assessment of Plans and Programmes Regulations 2004* (the SEA Regulations). Whilst the SA guidance provided information to assist compliance with the SEA Directive, a separate guidance note for the production of SEA is set out in *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM et al, 2005). Furthermore recent guidance (last updated 31st December 2020) is found in the Planning Practice Guidance on SEA and Sustainability Appraisals. This Scoping Assessment has followed all the guidance set out in the above documents.

2.4 It should be noted that all references to SA throughout this document encompass any relevant requirements listed above.

3. The Sustainability Process

3.1 There are five main stages in the production of an SA which are listed as A-E below:

Sustainability Appraisal process		
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope	Pre-production: review of the EAP, consultation and evidence gathering for Update
Stage B	Developing and refining options and assessing effects	Production and consultation
Stage C	Preparing the SA Report	
Stage D	Consulting on the draft DPD and the SA report	
		Adoption
Stage E	Monitoring the significant effects of implementing the EAP	

3.2 This Scoping document forms part of Stage A (*Setting the context and objectives, establishing the baseline and deciding on the scope)* of the Sustainability Appraisal which seeks to identify the relevant policies, plans and programmes as well as sustainability objectives and collect baseline information and is broken down into the following tasks.

- **A1:** Identifying other relevant policies, plans and programmes, and sustainable development objectives.
- **A2:** Collecting relevant social, environmental and economic baseline information.
- **A3:** Identifying key sustainability issues for the SA/DPDs to address.
- **A4:** Developing the SA framework consisting of SA objectives and indicators.
- **A5:** Consulting relevant authorities on the scope of the SA.

3.3 This report aims to ensure that the Sustainability Appraisal is fully comprehensive and addresses the most relevant issues concerning the Euston area. A key aim is to ensure

early input from statutory consultees identified in paragraph 1.6 above. Each of the stages identified above will be examined in turn in the subsequent chapters.

4. Stage A1: Identifying Relevant Policies, Plans and Programmes, and sustainable development objectives

4.1 The SA for the Euston Area Plan Update must include the relationships between the Camden Local Plan 2017, other Development Plan Documents, plans, programmes and sustainability objectives. This section presents an overview of existing plans, programmes, policies and sustainability objectives that are considered to be of most relevance.

4.2 In addition, the SEA Directive specifically requires environmental protection objectives established at international, European Community or national levels to be taken into account. The Environmental Report should provide information on:

- The relationship [of the plan or programme] with other relevant plans and programmes; and
- The environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation" (Directive Annex I a and e).

4.3 Government Planning Guidance on Sustainability Appraisals sets out that the scoping stage (Stage A) needs to identify the scope and level of detail of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives. A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the plan being assessed.

4.4 A review of relevant policies, plans and programmes has been carried out as part of this stage of the SA process. The objectives and requirements of international and European strategies and Directives are now sufficiently well established to have translated down into existing and emerging national, regional and local programmes, plans and policies. Table 1 below lists the international and European strategies and Directives that will have been taken into account. The links to these sources of these documents are provided.

Table 1 – Key International and European Strategies and Directives

International Organisations, the Relevant Documents and Key Messages Relevant to Other Plans and Programmes	
C40 Cities	Opportunity 2030: Benefits of Climate Action in cities (2018) This report provides analysis on the impacts of climate action through energy efficiency retrofit in residential buildings, enhanced bus networks and services, and district scale renewable energy. The report demonstrates the socioeconomic and health-related benefits of climate actions for societal wellbeing. The measure applicable to Camden is *Energy efficiency retrofit of residential buildings*. This document also cross-references to the UN Sustainable Development Goals.
	Urban Climate Action Impacts framework

	This provides a useful framework for describing and measuring sustainable development in relation to 'Climate Action Impacts Taxonomy' in an urban setting.
United Nations (UN)	UN Sustainable Development Goals Of the 17 UN goals Camden can help to achieve 13 of them: Goal 1: No Poverty Goal 2: Zero Hunger Goal 3: Good Health and wellbeing Goal 4: Quality Education Goal 5: Gender Equality Goal 6: Clean Water and Sanitation Goal 7: Affordable and Clean Energy Goal 8: Decent Work and Economic Growth Goal 9: Industry, Innovation and Infrastructure Goal 10: Reduced Inequalities Goal 11: Sustainable Cities Goal 12: Responsible Consumption and Production Goal 13: Climate Action Goal 14: Life Below Water Goal 15: Life on Land Goal 16: Peace, Justice and Strong Institutions Goal 17: Partnerships
	UN Framework Convention on Climate Change (UNFCCC) (1992) The UNFCCC sets out to achieve stabilisation of greenhouse gas concentrations in the atmosphere at safe levels.
	UNFCC Kyoto Protocol (1997) • The Kyoto protocol commits the UK to specifically set targets to limit or reduce greenhouse gas emissions. The protocol seeks a total cut in greenhouse-gas emissions of at least 5% from 1990 levels in the commitment period 2008-2012(8% for EU/12.5% for UK).
	UNFCC Doha Amendment to the Kyoto Protocol (2012) The Doha amendment to the Kyoto Protocol added a second commitment period to reduce GHG emissions by at least 8% below the 1990 levels in the 8 year period from 2013 to 2020. The UK has agreed to this reduction as part of the European Union.
European Union (EU)	European Landscape Convention 2000 This promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention came into force March 2004.
	Convention for the Protection of the Architectural Heritage of Europe (1985) The key purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage. It establishes the principles of "European co-ordination of conservation policies" including consultations regarding the thrust of the policies to be implemented.
	European Convention on the Protection of Archaeological Heritage (1995) This convention is concerned in particular with arrangements to be made for co-operation among archaeologists and town and regional planners in order to ensure optimum conservation of archaeological heritage.
	Initial Directive of 1985 85/337/EEC and amendments codified by 2011/92/EU Assessment of the Effects of certain Public and Private Projects on the Environment This establishes the requirements to undertake an Environmental Impact Assessment (EIA) of specified projects likely to have a significant impact on the environment.

	Renewed EU Sustainable Development Strategy (EU SDS) (2006) and 2009 review; and linkage to the Europe 2020 Strategy and the international SD Agenda This provides a definition of sustainable development "*to meet the needs of the present generation without compromising those of future generations*." The priorities are to: combat climate change; ensure sustainable transport; address threats to public health; manage natural resources more responsibly and stop biodiversity decline; combat poverty and social exclusion; and meet the challenge of an ageing population. The Europe 2020 Strategy was adopted in 2010 to move Europe towards smart, sustainable and inclusive growth.
	Environment Action Plan to 2020, the 7th EAP that will be guiding European environment policy until 2020 The objective of the 7th EAP is summarised in the title "Living well, within the limits of our planet." This EU environment policy steers a course between mankind's justified desire for well-being and the limits set by the environment. This is underpinned by a vision for 2050.
	European Union Air Quality Directive 2008/50/EC This sets out measures aimed at defining and establishing objectives for ambient air quality and cleaner air.
	The EU Water Framework Directive (2000/60/EC) Establishes a comprehensive framework which includes promoting more sustainable water management and use.
	The EU Biodiversity strategy for 2030 This is a long term plan to protect nature and reverse the degradation of ecosystems.
	EU Birds Directive (79/409/EC) - The Birds Directive 2009/147/EC codified version of Directive 79/409/EEC as amended The directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds.
	EU Habitats Directive (92/43/EC) Member States must take all necessary measures to guarantee the conservation of habitats in special areas of conservation, and to avoid their deterioration.
	Directive 2002/49/EC: Environmental Noise This Directive places requirements on Member States to assess and manage environmental noise from various sources, including roads and railways. Action plans will have to be drawn up to manage noise issues and effects including noise reduction.
	Directive 2008/98/EC on Waste (The Waste Framework Directive) This Directive lays down measures to protect the environment and human health by preventing or reducing the generation of waste, the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use, which are crucial for the transition to a circular economy.
	Directive 2001/77/EC: Electricity Production from Renewable Energy Sources (2001) - Directive 2009/28/EC: Promotion of the use of energy from renewable sources This Directive creates a common set of rules for the use of renewable energy in the EU so as to limit greenhouse gas (GHG) emissions and promote cleaner transport.

4.5 Further assessment relates only to those national, regional and local strategies, plans

and programmes which have been considered to have most relevance to the Euston Area Plan update. It has proceeded on the presumption that sustainability policy and objectives of higher order plans are now sufficiently embedded within them.

4.6 Table 2 below provides a summary list of the national, regional and local strategies, programmes, plans and policies that have been reviewed. Links to the sources of these documents are also provided.

Table 2 – National, Regional and Local Strategies, Programmes, Plans and Policies

	Ref No.	Document title
National	1	National Planning Policy Framework 2021 National Planning Practice Guidance
	2	Implementing the Sustainable Development Goals 2019
	3	The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting
	4	A Green Future: Our 25 Year Plan to Improve the Environment, DEFRA 2018
	5	Clean Air Strategy 2019
	6	Waste Management Plan for England 2021
	7	Our Waste, Our Resources: A strategy for England 2018
	8	The Historic Environment in Local Plans: 1
	9	Managing Significance in Decision Taking in the Historic Environment: Good Practice Advice Note 2
	10	Conservation Area Designation, Appraisal and Management (Historic England, 2019) Historic Advice Note 1 (second edition)
	11	The Setting of Heritage Assets – 2nd Edition (Historic England, 2017)
	12	Tall buildings Historic England Advice Note 4 (2015)
	13	Biodiversity 2020: A strategy for England's wildlife and ecosystem services (revised 15th October 2020)
	14	The Community Infrastructure Levy Regulations 2010 and amendments 2014
	15	Thames Abstraction Licensing Strategy (Environment Agency, 2019)
	16	Fair Society, Healthy Lives - The Marmot Review (post-2010)
	17	Land contamination risk management (LCRM) 2021
	18	Noise action plans: large urban areas, roads and railways (2019) Environmental Noise (England) Regulations 2006
	19	BREEAM
	20	Home Quality Mark
	21	Passivhaus
	22	Energy White Paper: Powering our net zero future Updated 18th December 2020
	23	Future of Mobility: Urban Strategy Moving Britain Ahead March 2019 (Department for Transport Industrial Strategy)
	24	Safer Places: The Planning System and Crime Prevention (Home Office/ODPM 2004)

	25	Planning policy for traveller sites 2012
	26	Gear Change A bold vision for cycling and walking
Regional (London)	27	The London Plan 2021
	28	Mayor's Transport Strategy 2018
	29	Economic Development Strategy 2018
	30	London Housing Strategy 2018
	31	Housing in London 2020 The evidence base for the London Housing Strategy
	32	Good Quality Homes for all Londoners - consultation draft (October 2020)
	33	Homes for Londoners: Affordable Housing and Viability SPG 2017
	34	London's Environment Strategy 2018
	35	London Health Inequalities Strategy 2018
	36	London Sustainable Drainage Action Plan, 2016
	37	London Infrastructure Plan 2050
	38	Accessible London: Achieving an inclusive environment (GLA 2014)
	39	Capital Gains: A Better Land Assembly model for London 2018
	40	The Mayor's Sustainable Design and Construction: SPG 2014
	41	Social Infrastructure SPG, 2015
	42	Shaping neighbourhoods – play and informal recreation SPG 2012
	43	Shaping neighbourhoods: character and context 2014
	44	London View Management Framework SPG 2012
	45	Mayor London's Culture Strategy 2018
	46	Culture and the Night-Time Economy SPG 2017
	47	Crossrail Funding SPG updated March 2016
	48	The Control of Dust and Emissions during Construction and Demolition SPG (July 2014)
Local (Camden)	49	Camden 2025
	50	Our Camden Plan
	51	Camden Local Plan 2017
	52	Camden Planning Guidance
	53	Camden Site Allocations
	54	Camden Infrastructure Study June 2019
	55	Camden Conservation Area Appraisals
	56	Camden Character Study 2015
	57	Camden SHMA 2016
	58	Financial Viability Study, BNP Paribas 2016
	59	Employment Land Study 2014
	60	Camden Retail and Town Centre Study 2013 - GVA
	61	Gypsy and Traveler and Travelling Showpeople Accommodation Assessment ORS 2014
	62	Camden 2019-2022 Clean Air Quality Action Plan
	63	Strategic Flood Risk Assessment 2014
	64	London Borough of Camden Annual Monitoring Report
	65	Camden Housing Delivery Test Action Plan 2020
	66	North London Waste Plan
	67	Camden Joint Strategic Needs Assessment 2019

	68	Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041
	69	Camden Biodiversity Action Plan
	70	Camden Climate Action Plan 2020-2025
	71	Annual School Places Planning Report (Primary and Secondary) 2019
	72	Camden Open Space, Sport and Recreation Study Review; Atkins; 2014
	73	Camden Reduction and Recycling Plan 2018-2022
	74	Camden Carbon Scenarios for 2025 and 2030 - An update to the 2010 Study 2019

5. Stage A2: Baseline information

5.1 Baseline information can be used to predict and monitor effects and forms a key determinant in identifying the sustainability issues and ways of taking them into account. This section presents an overview of the baseline information that is considered to be of most relevance to the Update to the Euston Area Plan.

5.2 Some information is broad and relates to the wider local authority area, but where relevant and possible, information that is more specific to the Euston area is provided. There is a great deal of available information and demographic and statistical indicators that could be listed, but as stated in Government guidance the level of information should be relevant and appropriate to the spatial scale of the plan.

5.3 The baseline topics and issues listed are intended to correlate as closely as possible with indicative SEA Directive and guidance headings of: population and human health, biodiversity, fauna and flora, soil, water, air, climactic factors, material assets and cultural heritage and landscape. There will inevitably be a degree of interrelationship between the issues.

5.4 Whilst identifying current baseline data and trends may be relatively straightforward, there will be underlying uncertainty in projecting analysis so far forward on the basis of current information available, some of which will be affected by the global Covid-19 pandemic. Any identified trends will tend to be short to medium term., there may be significant changes to Camden as a whole in the longer term, which cannot be accurately predicted or forecast.

5.5 The baseline information has been collected under a number of subtopics which can be classified as environmental, social or economic factors. To demonstrate how the SEA topic areas (as set out in Annex 1 of the SEA Directive) have been covered, these are included in brackets beside the relevant SA sub-topic as follows:

5.6 Environmental

- Transport and traffic (*air*, *human health, climatic factors*)
- Cultural heritage and landscape (*cultural heritage*, *landscape*)
- Open space (*landscape*, *human health*)
- Biodiversity, flora and fauna (*biodiversity, flora and fauna*)
- Air quality (*air, human health, climatic factors*)
- Soil (*soil*)
- Water and flooding (*water*, *climatic factors*)
- Noise and vibration (*population*, *human health*)

- Climate factors (*energy use, sustainable construction, SUDS*)
- Recycling and waste management (*population*, *human health*, *water*)
- Development on previously developed land (*material assets, soil*)

Social

- Population (*population*)
- Health and community (*human health*)
- Deprivation and social exclusion (*population*)
- Education (*population*)
- Housing (*material assets, population*)
- Leisure (*human health*)

Economic

- Town centres and Employment

Table 3 – Baseline Indicators

5.7 Table 3 shows the baseline indicators that review the situation locally. Some of the indicators have had minor changes since the original EAP Sustainability Appraisal. The changes are explained in Appendix 3. The indicators have been selected as it was considered that they provide a comprehensive picture of the area as it is now and would be able to be monitored in the future to measure the progress of the EAP in achieving sustainable development.

Environmental indicators	
Transport and traffic (commentary will be included to reflect potential impacts of Covid-19)	• Location of major transport demand generating developments • Number of agreements signed for car-free or car capped housing • % reduction in motor traffic flows through the borough • Proportion of resident trips by walking or cycling • % increase in walking as share of modal split • % Increase in cycling as share of modal split • % Increase in bus passenger journeys
Cultural heritage and Landscape	• Conservation areas • Designated and non-designated heritage assets • Heritage at risk • Extent of archaeological priority areas • Number and condition of scheduled ancient monuments
Open space	• Open spaces • Open space deficiency • Open space lost as a result of HS2 works • Area of designated open space /improvements to open space • Number of Tree Preservation Orders (TPOs) served • Number of applications affecting trees protected by TPOs

	• Number of applications permitted that involved the loss of trees protected by TPOs
Biodiversity, flora and fauna	• Change in priority species (by type) • Change in priority habitats (by type) • Net loss/gain of Sites of Nature Conservation • Importance and other sites of special biodiversity value, such as open spaces
Air quality	• Carbon dioxide (CO2), Nitrogen dioxide (NO2) and particulate matter (PM10) emissions
Soil	• Number of sites of potential land contamination
Water and flooding	• Water quality • %/Number of new developments incorporating water conservation measures (e.g. SUDS) • Water use • Number of properties at risk from 1% and 0.1% Floods
Noise and vibration	• Number of noise complaints received by the Council • Number of important areas 'noise hotspots' defined by Defra
Climate factors	• Carbon dioxide emissions • Climatic events • Proportion of energy generated from renewable sources • Domestic energy efficiency
Recycling and waste management	• % of household waste recycled
Development on previously developed land	• % of housing on previously developed land • % of vacant buildings
Socio-economic indicators	
Population	• Population by age and sex • Population by ethnic group • Population by place of birth • Population growth • Household size and composition • Population density (persons/ha) • Household projections
Health and community	• Healthy life expectancy • Major causes of death • People using outside space for health/exercise • Proportion of active adults • Excess weight in adults • Excess weight in 4-5 and 10-11 year olds • Air quality health impacts • Camden Primary healthcare estate • Accommodation for older people • Accommodation for people with extra/complex needs • Levels of crime • People with limiting long term illness

	• Distance of households from GPs and hospitals/ access to GP per 1000 • Number of GPs or primary care professionals in Camden • Number of sports/playing fields and outdoor recreation spaces • Number of hostels and care homes
Deprivation and social exclusion	• Household income • Number of Super Output Areas (SOAs) within 10% most deprived in England • Life expectancy • Fuel poverty • Claimant count unemployment rate • Households with children in families on key benefits • Unemployment by ward
Education	• Area of new education facilities created • School capacity (pupil place calculation) and areas of education provision deficiency • Number of NEET's (young people not in education, employment and training
Housing	• Housing stock by tenure • Dwellings by type • Overall need • Housing composition • Condition of housing stock – unfit dwellings by tenure, overcrowded households • House prices and rents • Ratio of average house price to earnings • Housing with special needs • Number of new homes completed • Student housing completions • Affordable housing completions • Mix of housing sizes • Vacant housing units • Number of affordable housing completions • %/number of all new housing units designed with Part M wheelchair accessibility
Town Centres and Employment	• Completed retail, food, drink and entertainment floorspace • Vacancy in town centres and other designated frontages • Retail, food, drink and entertainment uses • Employment floorspace completed and available • Growth areas projected floorspace • Industrial structure and key sector • Supply of employment land • Number of secured apprenticeships in Camden

5.8 Appendix 4 provides the detailed identified baseline information. Some baseline gaps existed for the Local Plan SA and the Site Allocations Local Plan SA. These indicators

have been either altered or removed where appropriate for the updated baseline collection of the EAP update. As this is the preliminary stage in the SA process, it is possible that additional sources may be discovered through consultation. Should this be the case, the baseline will be updated accordingly.

6. Stage A3: Identification of key issues

6.1 Having reviewed the relevant plans and programmes (Table 2) and identified baseline information (Table 3) the main sustainability issues that have emerged are shown in Table 4 below.

Table 4 – Sustainability issues

Issue	Summary and Source of Evidence
Environmental	
Development pressures and protecting the historic environment	There are three Conservations Areas within and adjacent to the Euston Area Plan boundary, along with a number of listed buildings. There are also many designated and non-designated heritage assets within and in areas adjacent to the Area Plan boundary some of which could be affected by development in the area. There is one Tier 2 Archaeological Priority Area (Cumberland Market) within the EAP boundary. The Council needs to ensure that development does not cause harm to the significance of heritage assets and where possible enhances their character and appearance.
Promoting zero carbon Camden by 2030 with energy efficiency and renewable energy. Where there are significant travel-demand generating uses, sustainable and active modes of travel should be encouraged, enabled and prioritised in these locations. Reducing carbon dioxide emissions to meet the Borough's targets and mitigating the effects of climate change.	There is a nationally recognised need to increase the energy efficiency of new and existing buildings and install more renewable energy facilities on new and existing buildings (NPPF). In November 2019, Camden Council formally declared a Climate and Ecological Emergency, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems, and committed to do everything it can to make Camden net zero carbon by 2030 Government data for 2017 (the latest national dataset available) shows that 'direct' carbon dioxide emissions in Camden have reduced by 39% since 2005. Data for 2018 will be published in July 2020 and is expected to show that Camden has met the 40% borough wide target set in Green Action for Change.
Limited scope for creating new open space. There is a deficiency of open	There are relatively few open spaces in the area west of Euston Station. However Regents Park is

space in the Euston area in terms of accessibility of high quality usable open spaces.	nearby, providing residents of the sub area with easy access to a Metropolitan Park, which provides a range of informal and formal recreational facilities. Areas to the east of the Regent's Park area; and to the south west of the Somers Town area are deficient in terms of access to play space. Open spaces have been lost in the Euston Area due to HS2 construction works, in particular the loss of St James's Gardens and temporary loss of Euston Square Gardens.
Need to effectively recycle and manage waste from construction projects to conversion of existing buildings using Circular Economy principles.	The population of the borough will increase considerably over the next ten years, increasing the need for our waste to be sustainably managed.
Air quality in Camden is poor and does not meet the air quality standards for nitrogen dioxide and particulate matter.	Camden has some of the poorest air quality in Europe, especially in the south of the borough where traffic congestion is severe. In 2019 there were an estimated 91 attributable deaths in Camden due to small particles ($PM_{2.5}$) and an estimated 173 attributable deaths due to nitrogen dioxide (NO_2) giving a total of 264 attributable deaths across the Borough each year. Camden has three automatic monitoring station monitoring nitrogen dioxide and particulate matter of which one is located as a roadside monitor at Euston Road. The Euston Road experienced exceedances of the hourly mean objective for nitrogen dioxide levels in 2017. The key areas linking planning and air quality are road transport, construction, energy generation, and the operation of certain industrial processes. Each serves as a source of pollution emissions that should be mitigated. It is important that the planning system plays its part in helping reduce emissions in the borough. Camden is working to address this issue by: reducing transport emissions, reducing emissions from buildings and new developments. Camden's Air Quality Action Plan 2019-2022 Camden Public Health Outcomes Framework 2017
Potential contamination on previously developed land	While no sites in the borough are currently designated as contaminated for the purposes of the Environment Act 1990 Part II A, numerous sites in the borough have been previously utilised for heavy industry and other polluting uses and

	this may pose contamination problems for future development on such sites, especially given development is on previously developed land. There are no historic watercourses in the Euston area and the area is just outside a Local flood risk zone.
Risk of surface water and groundwater flooding in parts of Camden due to increase in the amount of built land	Although there are no areas at risk of flooding from rivers or the sea there are approximately 38,800 properties in the Camden within areas at risk of surface water flooding at potential depths of >0.1m, and 12,700 properties in areas at risk of flooding to potential depths of >0.3m. (Environment Agency) The proportion of developed land (impermeable surfaces) in Camden increases surface water flooding risks, so it is important that development considers appropriate measures of drainage.
Water supply and use	Camden is within Thames Water's London Water Resource Zone which is classified as 'seriously water stressed.' This means there is a high population with high water demands and limited water availability. Currently water use accounts for 27 percent of all carbon emissions from our homes. In London non-households accounts for 29 percent of water consumption and this is therefore an area where further water and carbon savings can be made.
There should be no further decline in priority species and we need to seek ways to protect and enhance/increase their habitats.	Camden Biodiversity Action Plan identified priority species. Need to ensure that priority species do not further decline in the borough and receive adequate protection and encouragement through the planning process. There are 4.56ha of sites that are managed for nature conservation in Camden. Existing Sites of Important Nature Conservation provide important habits for priority species and other flora and fauna in the borough, which need to be protected from future development.
Increased pressure on waste management facilities	The increase in the population of the Euston area in the future will place increased pressure on existing waste management facilities and highlights the need to ensure waste is managed efficiently and where possible reduced, reused and recycled.
Sustainable design and use of resources	Improvements in building design is needed will to promote energy conservation and efficiency resulting in reduced energy consumption. This will assist in reducing air pollution and carbon dioxide emissions from generating power for heating and electricity.
Social	

Meeting the housing needs of ever changing and expanding population	The number of people living in Camden is increasing and the makeup of the borough's population is changing. Camden Local Plan aims to meet need of existing and future households by exceeding a target of 16,800 additional homes 2016/17 - 2030/31, including 11,130 additional self-contained homes. In 2019 it was estimated that Camden's population would increase by 4% over the next 10 years. The GLA population projections forecast growing proportion in the 65 plus age group, a changing age structure with fewer younger children. Housing need includes these groups in Camden: general needs housing, accommodation for students, older and vulnerable people and traveller accommodation.
The affordability of housing and the supply of affordable housing in the Euston area	The ratio of average house prices to average earnings for Camden in 2017 was 18.97 (i.e. average house prices are 18.97 times median earnings). This compares with 13.24 across London overall, and 7.77 across England and Wales. The cost of housing relative to income is a major issue for Camden. The Council aims to exceed a borough strategic target of 5,300 additional affordable homes 2016 – 2031 with a mix of housing types.
Wide disparities between deprived and affluent areas in the Euston area	There are wide disparities of deprivation and affluence within Euston area wards compared to the rest of the Borough. Mean Incomes at ward-level show the lowest income level is in St Pancras and Somers Town ward with £29,935 compared to the highest mean income in Frognal and Fitzjohns ward with £57,477. Camden's mean annual household income is higher than that of Greater London's average, but there is significant disparity between wards within Camden. Camden has seen a mixed change since the 2010 Index of Multiple Deprivation to 2015 data (less deprived in some measures and more deprived in others. There are very wide disparities within the Borough and wards. The proportion of children living in low income families is significantly higher in St Pancras and Somers Town compared to other ward areas in Camden. (Source: Personal tax credits: Children in low-income families local measure, 2016)

Large health inequalities within Camden	People suffering from poor general health, mental ill health and low life expectancy are generally concentrated in the borough's most deprived wards including St Pancras and Somers Town. For local health and wellbeing it is important that Camden continues to provide measures to help reduce car use and promote more sustainable and active forms of travel. 21% of children in Reception and 36% of children in Year 6 in Camden are overweight or obese. As of 2017/18, Camden has a similar prevalence of excess weight in year 6 children, compared to London and England.
Poor housing conditions and overcrowding	There are an estimated 13,979 households in Camden are overcrowded. (Source: 2011 Census, Department for Communities and Local Government, 2017/18)
Education inequalities and increased demand for school places	71% of 5 year olds in Camden are reaching a 'good level of development' at the end of reception. It is significantly lower in Camden compared to the London average (74%). PHE, 2019 Growth in the Euston and King's Cross areas will generate demand for additional school places/ facilities (source: Camden Children, Schools and Families).
Reduce levels of crime and fear of crime	Camden has the 13th highest rate of violent crime offences out of the 33 London boroughs (source: PHE 2019)
Economic	
Unemployment and Job Opportunities for local people	There are significant disparities in employment between different wards in Camden, in that some wards in Camden rank very high in unemployment, whereas others rank very low. (source DWP Claimant Count, December 2017). In 2017 about one in ten people aged 16 to 64 years are claiming an out-of-work benefit in Camden (8%). Camden has the 9th highest proportion of out-of-work claimants in London (7%). (Source: DWP, accessed the 7th of September 2017)
Need to support development in existing centres and ensure the health of town centres.	Vacancy of units has increased in the last two years, and will be further exacerbated by the longer term impacts of Covid-19.
Ensure range of provision for employment clusters to accommodate need	The key employment sectors experiencing growth are: professional, scientific and technical, business administration and support, and health. The employment sector with the greatest proportionate decrease has been manufacturing and transport storage. (Employment Land

	Review, 2014). Science and technology employment sector has grown significantly in Camden (one third of jobs in the borough, which is the highest concentration of any LA area in the UK). Euston and surrounding area is part of the Knowledge Quarter (a concentration of medical, educational, cultural and research institutions)

7. Stage A4: Developing the Sustainability Appraisal Framework

Developing the SA Objectives

7.1 The SA objectives in table 5 below have been developed using the objectives from the previous SA for the EAP. They have been updated where the specific sustainability issues have changed since the previous SA and the review of the relevant plans, policies and programmes and to accord with objectives in the Site Allocations Local Plan. Appendix 7 highlights where there have been changes in the objectives.

7.2 Camden's annual Authority Monitoring Report (AMR) has been particularly important in identifying indicators, which will play an important role in the monitoring and in achieving sustainable development. Where possible and appropriate, any additional suitable indicators identified through this SA process will be added to the AMR to enable their effective monitoring.

Table 5 – Sustainability objectives

Ref.	Draft SA objective	Sub-criteria Will the Euston Area Plan…..	SEA Topic
Social			
1	To promote the provision of a range of high quality and affordable housing to meet local needs	a) Provide adequate housing completions to meet local needs b) Protect and promote affordable housing development c) Provide housing for people, particularly families, on moderate and lower incomes? d) Encourage development at an appropriate density, standard, size and mix? e) Provide everybody with the opportunity to live in a better home?	Population, Material assets,
2	To promote a healthy and safe community	a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and	Population, Human health,

Ref.	Draft SA objective	Sub-criteria Will the Euston Area Plan…..	SEA Topic
		promote healthy lifestyles? b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive? c) Support health providers and commissioners to fulfil their strategic estates plans? d) Reduce levels of crime and fear of crime in the area?	
3	To ensure access to local shopping, community and leisure facilities.	a) Encourage mixed use development? b) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?	Human health, Population
4	To tackle poverty and social exclusion	a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups? b) Provide for equality of access for all to buildings and services? c) Encourage development opportunities in those areas in need of economic development and ensure local residents benefit from growth?	Human health, Population
5	To improve amenity by minimising the impacts associated with development.	a) Ensure that the amenity of neighbours is not unduly impacted? b) Ensure that development and operations will not affect noise sensitive uses?	Human health
Environmental			
6	To conserve and improve open space provision and increase access to and enhancement of open space.	a) Help to protect, increase/improve open space? b) Help to increase access to and improve overall open space provision, including children's play space? c) Help to make it easier and safer to access local amenities on foot or by bicycle?	Biodiversity, flora and fauna, Human Health, Landscape
7	To improve local air quality and limit exposure	a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage the use of alternative modes of transport to the motorised vehicles and prioritise and encourage	Human health, Air

Ref.	Draft SA objective	Sub-criteria Will the Euston Area Plan…..	SEA Topic
		low emission, sustainable modes of transport (walking and cycling). e) Address the impact of motorised freight on air quality through working with local businesses to reduce, remode and retime their deliveries?	
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources and circular economy? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction? g) Reducing reliance on motorised vehicles. Where vehicles are still required encouraging the uptake of low-emission vehicles, particularly for taxis, buses and freight. h) Work with local schools to enable more journeys to and from schools in the Euston area to be made by sustainable, low-emission modes?	Climatic factors, Soil, Human health
9	To protect and manage water resources (including groundwater) and reduce surface water flood risk	a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Take into account potential flood risk?	Water, Biodiversity, flora and fauna, Soil, Population
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan? b) Provide for the protection of biodiversity and open space in the borough? c) Prevent habitat fragmentation and increase connectivity through habitat corridors? d) Protect and provide for the protection and planting of more trees in the	Biodiversity, flora and fauna, Human health

Ref.	Draft SA objective	Sub-criteria Will the Euston Area Plan…..	SEA Topic
		borough?	
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	a) Encourage development at locations that enable walking, cycling and/or the use of public transport? b) Encourage the provision of infrastructure for walking, cycling and/or the provision of public transport? c) Encourage access for all to public transport? d) Encourage a decrease in car usage? e) Enhance permeability of the area for access by non-motorised forms of transport? f) Identifying opportunities for increasing car club provision g) Increasing the provision of low-traffic neighbourhoods and Healthy School Streets	Human health
12	To promote high quality and sustainable urban design.	a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape? b) Ensure enhancement of the public realm and local distinctiveness? c) Encourage the use of sustainable design and construction methods?	Cultural heritage, Climatic factors
13	To protect and enhance the historic environment	a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?	Cultural heritage
Economic			
14	To ensure new development makes efficient use of land, buildings and infrastructure.	a) Encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?	Material assets,
15	To encourage and accommodate sustainable economic growth and employment opportunity.	a) Encourage the retention and growth of existing, locally based industries? b) Accommodate new and expanding businesses? c) Encourage new investment in the local economy and promote development opportunities for employment? d) Focus growth in growth areas and other	Material assets, Population

Ref.	Draft SA objective	Sub-criteria Will the Euston Area Plan…..	SEA Topic
		highly accessible locations?	
16	To maximise the benefits of regeneration and development to promote sustainable communities	a) Encourage sustainable inward investment that will promote social wellbeing and benefit the economy? b) Promote access to employment opportunities for local people? c) Protect existing and provide for new education facilities to meet needs, both for existing and new residents?	

8. Stage A5: Consulting

Consultation on the SA Scoping Report

8.1 The Government (through the *Environmental Assessment of Plans and Programmes Regulations 2004*) requires the contents of the scoping report to be consulted on with the following agencies:

- The Environment Agency
- Natural England
- Historic England

8.2 We are now at the stage where we wish to obtain the views of these agencies. Consultation at this stage will help to make sure that the SA will be as comprehensive and robust as possible and meet statutory requirements.

8.3 It is available for consultation for a period of five weeks in order to comply with the SEA Regulations (*The Environmental Assessment of Plans and Programmes Regulations 2004*, 12(6).

8.4 In seeking comments on this report, we have asked consultees to consider the following questions.

Q.1 Is the approach taken, in using the format of the previous SA scoping for the Euston Area Plan and the 2017 Local Plan SA Scoping report and the Site Allocations SA Scoping Report 2020 considered to be appropriate?

Q.2 Is the document clearly structured and does it cover the main issues in an understandable way?

Q.3 Is the review at Tables 1 and 2 of other plans, programmes and sustainability objectives sufficient for the purposes of this document? Are there any other relevant plans, programmes and sustainability objectives that should be taken into account?

Q.4 Do you consider that the range of baseline information at Appendix 4 is appropriate and/or are there any further baseline indicators that might provide useful information and where might they be sourced?

Q.5 Do you consider that the main sustainability issues have been satisfactorily identified from the baseline information?

Q.6 Do you consider that these proposed SA objectives are sufficient and adequately reflect the key sustainability issues?

Q.7 Do you have any other data, comments or suggestions that you think may be useful to inform the Sustainability Appraisal?

Following the period of consultation any comments on the Scoping Report will be considered and used to look at how the proposed SA should be revised to respond to them.

8.5 The emerging draft objectives of the updated Euston Area Plan will be tested against the SA objectives set out in this Scoping Report. This will allow an assessment of the relationship between the EAP objectives and sustainability objectives, and highlight any issues or inconsistencies.

8.6 Following from an assessment of the relationship between the updated EAP and sustainability objectives, an appraisal of emerging options for the EAP will be carried out. The draft SA Report will then be produced (which will include an assessment of the options appraised), which will then be subject to public consultation. The Final SA Report will be published alongside the (pre-submission) version of the updated EAP.

Appendix 1: EAP Scoping Report dated 2012

Appendix 2: Plans and programmes

Appendix 3: Changes to the EAP baseline indicators

Appendix 4: Baseline indicators information

Appendix 5: Proposed report structure for SA

Appendix 6: Proposed area plan boundary and consideration of options

Appendix 7: Changes to the 2015 Scoping Report Sustainability Objectives and Criteria