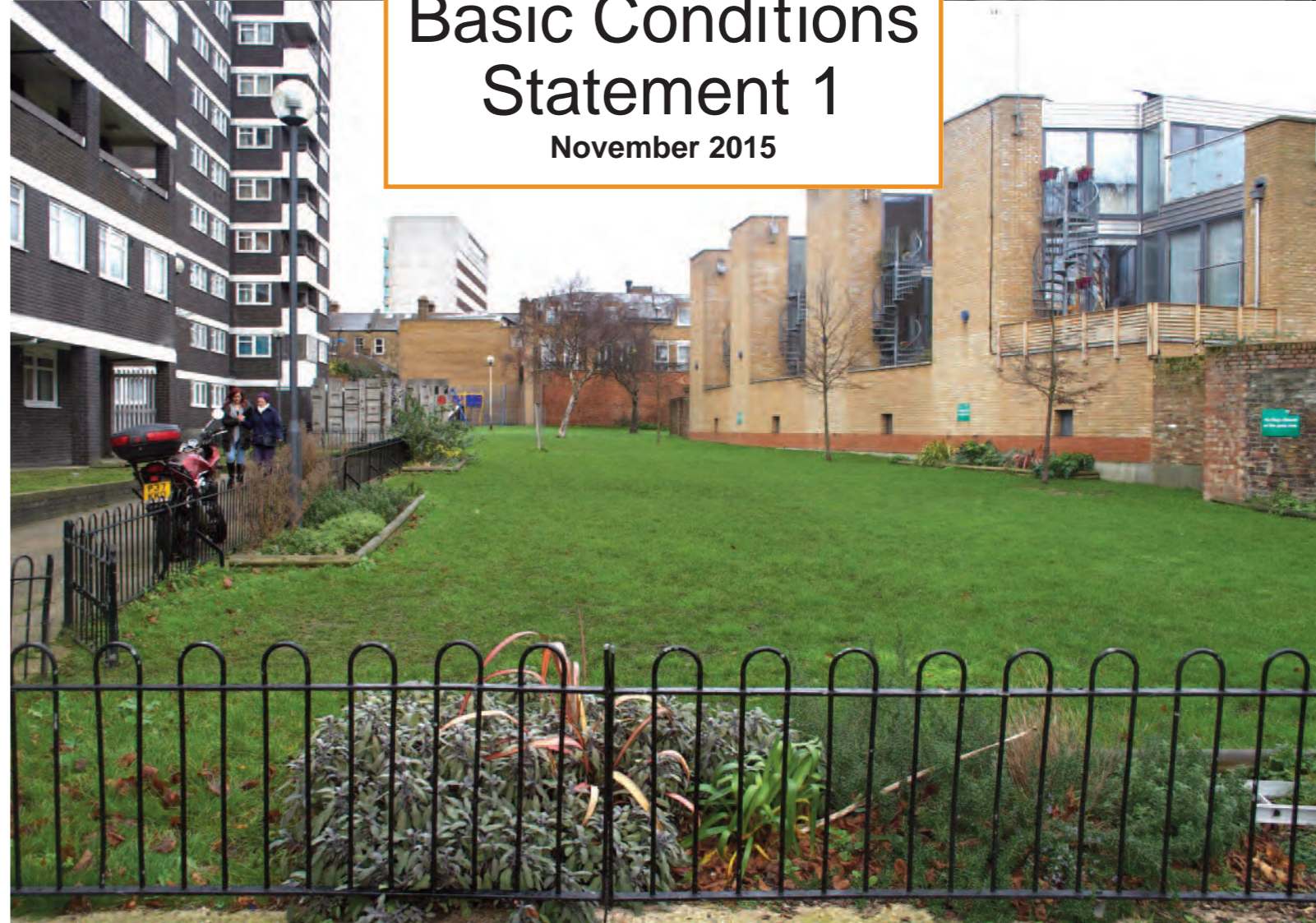




KENTISH TOWN
NEIGHBOURHOOD
FORUM

Basic Conditions Statement 1

November 2015



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INTRODUCTION

The following pages set out how the Neighbourhood Plan proposal fulfils the 'Basic Conditions' of neighbourhood planning and other considerations in order to satisfy the requirements set out in legislation and pass the independent examination.

This Basic Conditions Statement explains how the Neighbourhood Plan proposal as a whole and the policies it contains meet each Basic Condition and other legal tests.

The submitted Neighbourhood Plan proposal should also be read in conjunction with two additional documents, which have been prepared separately and in accordance with the relevant regulations:

Consultation Statement: this sets out the consultation and engagement with local residents, businesses and interested parties during the plan's preparation

Sustainability Appraisal: the Neighbourhood Plan proposal has been subject to Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment. The purpose of the SA is to ensure that the principles of sustainable development are considered throughout the plan making process and that all aspects of economic, social and environmental sustainability are considered in its production.

BASIC CONDITIONS AND TESTS TO BE MET

Schedule 4B of the Town and Country Planning Act (Para. 8) sets out the following conditions which a Neighbourhood Development Plan is required to meet.

1. The examiner must consider the following:

(a) whether the Neighbourhood Plan proposal meets the Basic Conditions,

(b) whether the area for any referendum should extend beyond the neighbourhood to which the Neighbourhood Plan proposal relates and

2. The Neighbourhood Plan proposal meets the Basic Conditions if:

(a) having regard to national planning policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Development Plan,

(b) the making of the Neighbourhood Development Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),

(c) the making of the Neighbourhood Development Plan contributes to sustainable development,

(d) the making of the Neighbourhood Development Plan does not breach and is otherwise compatible with EU obligations

LEGAL REQUIREMENTS – BASIC CONDITIONS

This section explains how the Neighbourhood Plan proposal complies with provision made by or under sections 61E(2), 61J and 61L.

• **The Neighbourhood Plan proposal is being submitted by a qualifying body**

In accordance with the Localism Act 2011, after due consultation, the London Borough of Camden (“the Council”) designated (a) the area covered by the Neighbourhood Plan (“NP”) and (b) Kentish Town Neighbourhood Forum as the Neighbourhood Forum for this neighbourhood area.

In order to meet the requirements for forming a Neighbourhood Forum, at least 21 people should lead and co-ordinate the plan making process. This condition was met when the Forum was established.

This NP has been prepared, and consulted on, by the Kentish Town Neighbourhood Forum. Neighbourhood Forums are a qualifying body entitled to prepare a neighbourhood plan.

The Kentish Town NP sets out policies relating to

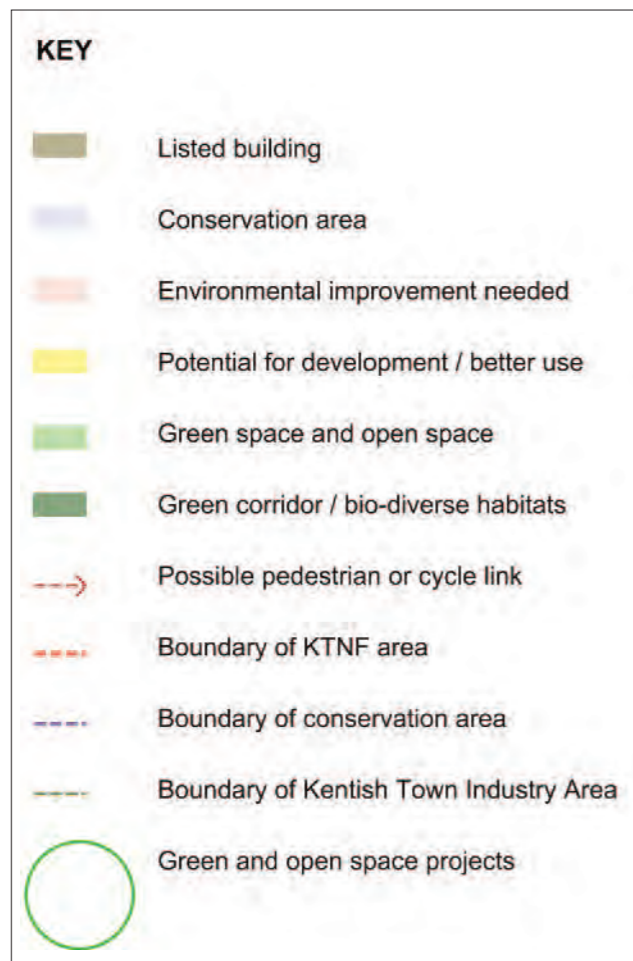
the development and use of land within the NP Area. Kentish Town Neighbourhood Forum and the Area were both designated on 10 April 2013. It includes the Bartholomew Estate, Inkerman, Kelly Street and Kentish Town Conservation Areas, (see Map on opposite page).

The NP Area comprises all of the ward of Kentish Town (except an area to the north west which is part of the “Murphy Site”; part (about one third) of the Canteloves ward; a small nodule around Arctic Street which is located in Gospel Oak ward and a sliver of land at the southern end of Kentish Town Road in the Camden Town & Primrose Hill ward.

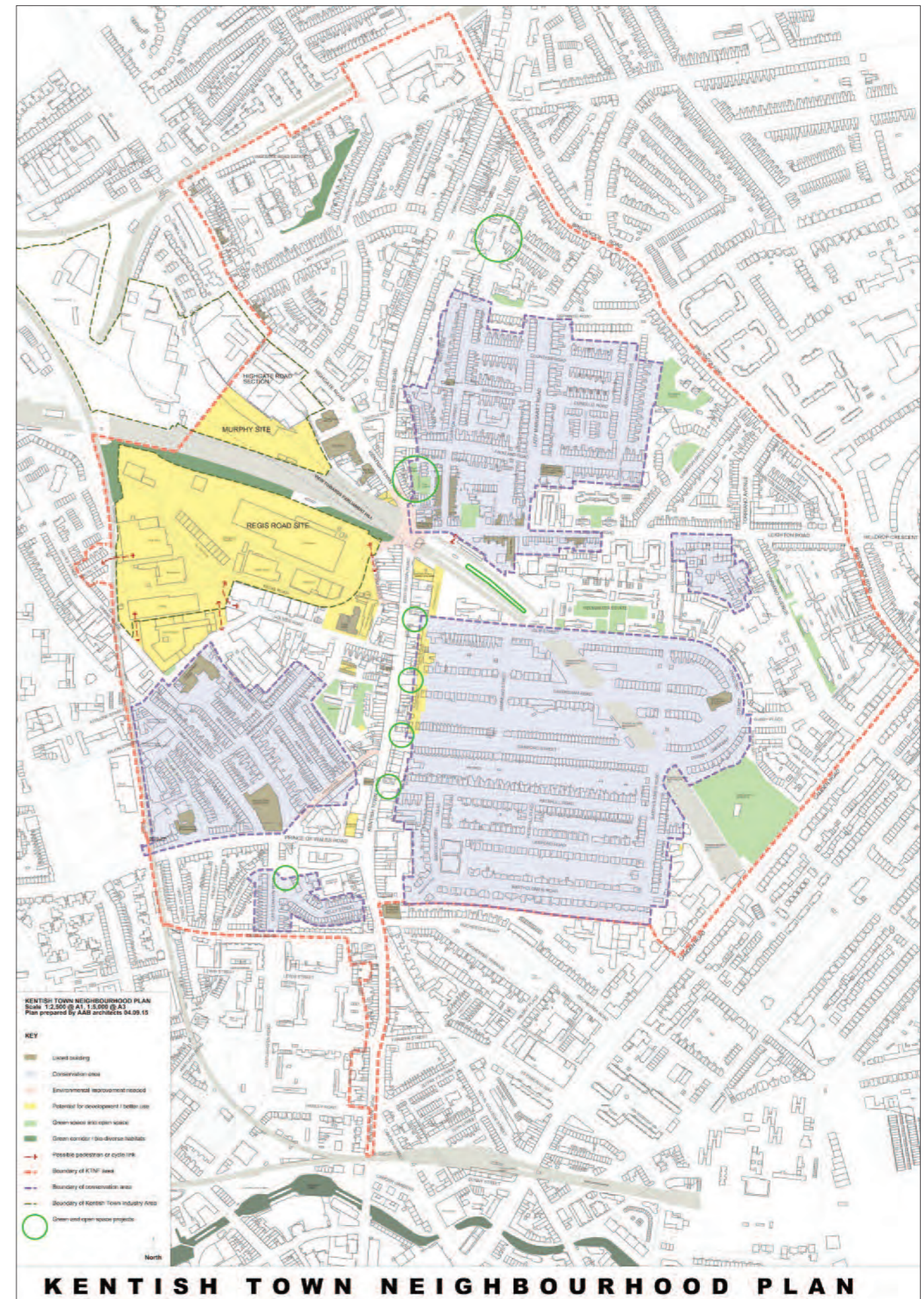
What is being proposed is a Neighbourhood Development Plan

The plan proposal relates to planning matters (it contains policies relating to the use and development of land) and has been prepared in accordance with the statutory requirements and processes set out in the Neighbourhood Planning Regulations 2012.

The main aims of the Neighbourhood Plan are set out in its Vision and Objectives on page 12 of the



▲ Enlarged Key for Map



Plan. The Vision statement can be summarised thus; We want to protect what is good about Kentish Town and through the Plan to foster positive and innovative development that will enhance the well-being of individuals living and working here. The aim of the Plan is to deliver the long-term goal of a balanced and vibrant neighbourhood. Planning future development has a vitally important role with developable land at a premium, a shortage of housing, and pressure to maintain employment space and open and green spaces. The Plan's aim is to balance these competing demands with the key aim of making the neighbourhood a better place to live and to work.

The Plan's Objectives cover seven areas:

1. Shopping & Working
2. Design
3. Getting Around
4. Green & Open Spaces
5. Community & Culture
6. Spatial policies
7. Site Specific policies

The Plan contains 25 policies for the future development of Kentish Town

1. Supporting Small Business (SW1)
2. Protection of Secondary Shopping Frontages (SW2)
3. Consecutive Secondary Shopping Frontages (SW3)
4. The View of Parliament Hill (D1)
5. Railway Lands (D2)
6. Innovative Building Design (D3)
7. Non-designated Heritage Assets (D4)
8. Step Free Access in Kentish Town Stations (GA)
9. Local Green Spaces (G01)
10. Open Spaces on Estates (G02)
11. Biodiverse Habitats (G03)
12. Statement of Community Consultation (CC1)
13. Community Facilities in Schools (CC2)

14. Protection of Public Houses (CC3)
15. Protection of Shops outside the Centre (CC4)
16. Kentish Town Square Phase 1 (SP1)
17. Kentish Town Potential Development Area "KTPDA" (SP2)
18. KTPDA General Development Criteria (SP2a)
19. Car Wash Site Kentish Town Road (SSP3)
20. York Mews, Section House and Land around the Police Station (SSP4)
21. Frideswide Place and Kentish Town Library (SSP5)
22. Wolsey Mews (SSP6)
23. 2 Prince of Wales Road (SSP7)
24. Veolia Site (SSP8)
25. Small Sites and Infill development (SSP9)

The Plan also sets out recommendations (or Projects), which should ensure that the Vision and Objectives of the Plan are fulfilled in a wide range of areas and with a variety of agencies. These Projects do not form part of the statutory Policies.

• The proposed Neighbourhood Plan states the period for which it is to have effect.

The period of the Kentish Town NP is up to [2031], in order to align it with the dates of the LB of Camden emerging Local Plan

• The proposed Neighbourhood Plan does not relate to more than one neighbourhood area and there are no other Neighbourhood Development Plans in place within the neighbourhood area.

The plan relates only to the NP Area and there are no other Neighbourhood Plans within the Neighbourhood Area.

HOW THE PLAN MEETS THE BASIC CONDITIONS

National policies and advice

The National Planning Policy Framework (NPPF) – sections 183-185, requires Neighbourhood Plans to have regard to the policies in the NPPF. The following section aims to show how the Kentish Town NP has regard to relevant policies within the NPPF in relation to:

- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Promoting sustainable transport
- Requiring good design
- Promoting healthy communities

- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment

The Table 1 opposite illustrates which NPPF policies are reflected in the Neighbourhood Plan's Policies

By way of further explanation, the following is intended to show how the Neighbourhood Plan's policies have been developed having regard to the NPPF

Building a strong, competitive economy

The NP has responded to popular support for local

| NPPF Chapter Heading and Policy paragraphs | Neighbourhood Plan Policy |
|--|--|
| Building a strong, competitive economy 18 - 22 | SP2; SSP1; SSP2; SSP3; SSP4; SSP5; SSP6; SW1; D2 |
| Ensuring the vitality of town centres 23 | SW1; SW2; SW3; SP2; CC3 |
| Promoting sustainable transport 29 – 32, 35, 38, 39 | SP1; SP2; SSP2; SSP3; SSP4; D2; GA |
| Delivering a wide choice of high quality homes 47 – 50 | SP2; SSP2; SSP3; SSP6; SSP7 |
| Requiring good design 56 – 67 | SP1; SSP1; SSP7; D1; D2; D3; D4 |
| Promoting healthy communities 69,70,72,73,74,76, 77, | G01; G02; G03; SP1; SP2 |
| Conserving and enhancing the natural environment 109 – 111, 114, | D1; SP1; SP2; G01; G02; G03; |
| Conserving and enhancing the historic environment 126, 133, | D1; D3; D4; |

▲ Table 1

employment through policies SW1 (Supporting Small Business), SP2 (Kentish Town Potential Development Area), SSP1 (Car Wash Site), SSP4 (Wolsey Mews), and SSP5 (2 Prince of Wales Road).

Ensuring the vitality of town centres

The NP reflects very strong support for local shops through policies SW2 (Protection of Secondary Shopping Frontages) and SW3 (Consecutive Secondary Shopping Frontages), CC4 (Protection of Shops outside the Centre) and SP1 (Kentish Town Square). These policies are designed to maintain and encourage a diverse range of retail offerings to attract people to shop in the area in a way that non-retail do not thereby adding to the vitality of the shopping centres.

Promoting sustainable transport

Traffic has been a key issue raised by the public during the consultations, with conflicting interests inevitably being raised. The NP seeks to reconcile the need for car parking to support local shops with improved safety for other road users, especially pedestrians. There is a growing proportion of people using the two railway stations (Kentish Town Thameslink Station and Kentish Town West Station) and Kentish Town Underground Station, none of which have step-free access. Pedestrian and bicycle access between west and east Kentish Town is poor. The NP seeks to improve accessibility through such policies as GA (CIL Priority), SP1 (Kentish Town Square), SP2 (Kentish Town Potential Development Area), SSP2 (York Mews and Section House), SSP3 (Frideswide Place/Kentish Town Library) and SSP4 (Wolsey Mews).

Requiring good design

Consultation demonstrated strong support for good design within the community. Policies D1 (The View of Parliament Hill), D2 (Railway Lands), D3 (Innovative Building Design), D4 (Non-Designated Heritage Assets), SP1 (Kentish Town Square), SP2 (Kentish Town Potential Development Area), and SSP7 (Small Sites and Infill Development) seek to enlarge upon, reinforce and apply locally the existing Council design policies.

Promoting healthy communities

A wide range of policies, in particular in the section 'Community and Culture' seek to promote and encourage active participation in community life and healthy activities. Policies CC2 (Community Facilities in Schools) is particularly aimed at the needs of young people. In the Green and Open Space section, policies GO1 (Local Green Spaces), GO2 (Open Spaces on Estates) and GO3 (Biodiverse Habitats) encourage L B Camden to retain and enhance Kentish Town's small number of open spaces for the benefit and health of the local community.

Conserving and enhancing the natural environment

Policies GO1 (Local Green Spaces), GO2 (Open Spaces on Estates) and GO3 (Biodiverse Habitats) enhance the environmental sustainability of the area. Policies SP1 (Kentish Town Square) and SP2 (Kentish Town Potential Development Area) provide for new open space and Policy D1 (The View of Parliament Hill) aims at conserving the views to Hampstead Heath.

Conserving and enhancing the historic environment

This is a subject of importance to an area proud of its history. Policies CC3 (Protection of

Public Houses) protects historic pubs in Kentish Town. Policy D4 (Non-Designated Heritage Assets) aims to preserve and protect buildings of architectural merit.

CONTRIBUTION TO THE ACHIEVEMENT OF SUSTAINABLE DEVELOPMENT

The Neighbourhood Plan is required to contribute to the delivery of sustainable development, which in essence means catering for the needs of the present and future generations in a way which does not create problems for or diminish the quality of life of future generations. Sustainable development is an important and consistent theme running throughout the NP.

1.1: Although there is no statutory requirement for Neighbourhood Plans to be accompanied by a SA, it was decided to outline briefly how the principles of sustainable development (as defined by the National Planning Policy Framework) have been taken into account in the preparation of the Plan.

1.2: The NPPF says (paragraph 6) that "the purpose of the planning system is to contribute to the achievement of sustainable development". It then (paragraph 7) defines three dimensions to sustainable development: economic, social and environmental:

- **an Economic role:** contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support economic growth and innovation, and by identifying and co-ordinating development requirements, including the provision of infrastructure.
- **a Social role:** supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.
- **an Environmental role:** contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve bio-diversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

1.3: The principles of sustainable development are at the heart of this Neighbourhood Plan and have been followed at all times during the process of drawing up

and writing this Plan. As this Plan has been written with regard to the policies in Camden Council's Core Strategy, this SA takes the approach of demonstrating how its policies align with the 16 principles set out in the Camden Core Strategy Sustainability Appraisal (January 2010). The Camden SA provides extensive detail about how sustainable development is a key part of the borough's planning policies. The Council considers that these sustainability objectives (see below) remain relevant.

1.4: Table 2 opposite and overleaf sets out how the Neighbourhood Plan meets the 16 sustainability objectives. The Plan is appraised to test whether it adequately addresses each of the objectives with the minimum of harm to others. It uses the grading system outlined below:

- **Excellent** – the Neighbourhood Plan makes a close to optimal contribution to the objective
- **Good** – the Neighbourhood Plan makes a significant positive contribution
- **Fair** – the Neighbourhood Plan makes some direct or significant indirect contribution
- **Neutral** – the Neighbourhood Plan does not contribute to the objective
- **Poor** – the Neighbourhood Plan does not fully explore the potential to contribute to the objective
- **Undermining** – the Neighbourhood Plan significantly undermines the objective
- **Not relevant** – the Neighbourhood Plan does not cover this objective

1.5: The appraisal demonstrates that the Kentish Town Neighbourhood Plan addresses social, economic and environmental objectives in an integrated way. It also demonstrates that Plan's vision, objectives and policies for the future development of the Area are fully consistent with:

- the sustainability objectives and targets which form the basis of Camden Council's SA
- all relevant policies, plans and programmes set at the international, national, regional and local level
- meeting the needs of the local community for housing, employment, retail, leisure and other uses.

| Sustainability Objective | How the Plan | Assessment | Explanation |
|---|--|------------|---|
| 1. To promote the provision of a range of high quality and affordable housing to meet local needs | Objectives 2 & 7 Policies 5, 6, 17, 18, 19, 20, 21, 24 & 25 | Excellent | The Plan calls for new housing, meeting a range of needs, and including adequate provision of affordable housing. It sets out how development shall be of high quality design and fitting of the character of the Area. |
| 2. To promote a healthy and safe community | Objectives 3, 4, 5, 6 & 7. Policies 8, 9, 10, 11, 13, 15, 16, 17, 18 & 23 | Good | The Plan promotes high quality design, which reduces social exclusion. It calls for new health and educational facilities in the area. It seeks to minimise local sources of pollution. It promotes cycling and walking. |
| 3. To ensure access to local shopping, community, leisure facilities and open space | Objectives 1, 3, 4, & 6. Policies 2, 3, 4, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18 & 23 | Excellent | The Plan contains policies for the protection and enhancement of town and neighbourhood centres in the Area. It calls for the protection of existing open space and creation of new open space. |
| 4. To tackle poverty, social exclusion and promote equal opportunities | Objectives 3, 4, 5, 6 & 7 Policies 8, 9, 10, 12, 13, 14, 15, 16, 17, 18, 20, & 23 | Good | The Plan calls for mixed use developments and affordable housing. It calls for a wide range of public and community facilities for the benefit of all sections of the community. |
| 5. To encourage and accommodate sustainable economic growth and employment opportunities | Objectives 1, 3, 6 & 7 Policies 1, 2, 3, 5, 8, 14, 15, 17, 18, 20, 21, 22, 23 & 24 | Excellent | The Plan seeks to promote economic growth, employment, and a vibrant local economy. It gives protection to existing businesses and employment, and sets the conditions for new investment, businesses and employment. |
| 6. To maximise the benefits of regeneration and development to promote sustainable communities | Objectives 1, 2, 5, 6 & 7 Policies 1, 2, 3, 5, 8, 12, 14, 16, 17, 18, 20, 21, 22, 24, & 25 | Excellent | The Plan encourages investment, regeneration and local employment - particularly in the Kentish town industrial Area. It seeks adequate local provision of education, health and community facilities. |
| 7. To promote high quality and sustainable urban design which protects and enhances the historic | Objective 2 Policies 7, 14 & 23 | Excellent | The Plan provides strong protection for the distinct character and heritage of the Area, including in conservation areas. The Plan promotes high quality design, attractive streets and public spaces, and protects historic buildings and monuments. |
| 8. To ensure new development makes efficient use of land, buildings and infrastructure | Objectives 2, 3, 6 & 7 Policies 5, 6, 16, 17, 18, 19, 20, 21, 22, 23, 24 & 25 | Excellent | The Plan seeks to provide development throughout the Area - particularly in the Kentish Town Industrial Area, The Murphy Site and The Railway Lands - that meets a range of needs. It promotes mixed use developments, and facilities and infrastructure for the benefit all sections of the community. |
| 9. To reduce reliance on private motorised transport | Objective 3, 6 & 7 Policies 8, 15, 17, 18, & 21 | Excellent | The Plan sets out a range of measures to improve the scope and capacity of public transport in and through the Area. It calls for a reduction in car use, as well as better provision for pedestrians and cyclists. |

▲ Table 2

| | | | |
|--|---|--------------|--|
| 10. To improve amenity by minimising the impacts associated with noise | Objectives 2, 3, 4, 6 & 7 Policies 6, 8, 9, 10, 16, 17, 18 & 25 | Fair | The Plan seeks a reduction in traffic levels, the use of local services, and an expansion of green/open space. |
| 11. To protect and manage water resources and reduce flood risk | Objective 2, 4 & 7 Policies 6, 9, 10, 11, 17 & 18 | Good | The Plan seeks the protection of existing green/open spaces and trees - and promotes new ones - as important water absorbing sites. The Plan specifies how to reduce flood risk in the Potential Development Area. |
| 12. To protect & enhance existing habitats and biodiversity and to seek to increase these where possible | Objective 2, 5, 6 & 7 Policies 5, 9, 10, 11, 17, & 18 | Good | The Plan promotes a range of measures to protect and enhance the Area's natural environment and biodiversity. It calls for new green spaces and the preservation of green space on housing estates. |
| 13. To reduce the amount of waste | | Not relevant | |
| 14. To improve air quality | Objectives 1, 3, 4, 6 & 7 Policies 1, 5, 6, 9, 10, 11, 17, 18 & 25 | Good | The Plan seeks a reduction in motor vehicle use. It promotes low-carbon homes and low-impact small and micro-businesses. It calls for additional green spaces and new trees. |
| 15. To provide for the efficient use of energy | Objective 2, 3, 6 & 7 Policies 5, 6, 8, 17, 18 & 25 | Good | The Plan supports low-carbon homes and high environmental standards in all development. It seeks a reduction in the use of petrol and diesel vehicles and promotes walking and cycling. |
| 16. To minimise the use of non-renewable resources | Objectives 1, 2, 3, 5, 6 & 7 Policies 1, 2, 3, 5, 7, 8, 13, 15, 17, 18, 20, 21, 22, 24, & 25 | Good | The Plan promotes local services, facilities and employment - reducing the need to travel. It promotes low-carbon homes and buildings; cycling and walking; and sustainable growth. |

▲ Table 2 continued

GENERAL CONFORMITY WITH THE COUNCIL'S STRATEGIC POLICIES IN THE DEVELOPMENT PLAN FOR THE AREA

The statutory development plan currently consists of the following documents setting out policies and proposals for the development and use of land:

- The London Plan prepared by the Mayor of London in March 2015, the latest published version consolidating alterations made to the Plan since 2011
- LB Camden's strategic policies in the Development Plan

The Neighbourhood Plan is in general conformity with the Council's adopted planning policies: Camden Core Strategy 2010-2025 (adopted 8 November 2010); Camden Development Policies 2010-2025 (adopted 8 November 2010); and Camden Site Allocations (adopted 9 September 2013).

The Council's strategic policies have been assessed with particular reference to its detailed

objectives and to the following specific policies, to ensure that the Kentish Town NP is in accord with the Council's adopted policies. In order to assess the compatibility of the Neighbourhood Plan with the strategic policies in the local Plan, Table 3 opposite has been produced.

Any Core Strategy policy not identified in Table 3 is not considered relevant to the Neighbourhood Plan because the Neighbourhood Plan does not have any policies directly relating to it.

Before the Neighbourhood Plan was formally submitted to Camden Council, planning officers confirmed to the NDF that they considered that the Neighbourhood Plan was in general conformity with the strategic policies in Camden Council's adopted planning policies. It is our conclusion that the Kentish

| Camden Core Strategy: Policy number & title | Neighbourhood Plan: Objectives & Policies |
|--|--|
| CS1 Distribution of growth | Objective 2, 6 & 7 Policy 17, 18, 20, 21 & 24 |
| CS2 Growth areas | Objective 2, 6 & 7 Policy 17, 18, 20, 21 & 24 |
| CS3 Other highly accessible areas | Objective 2 & 7 Policy 5, 6 & 24 |
| CS4 Areas of more limited change | (not relevant) |
| CS5 Managing the impact of growth and development | Objective - all Policy - all |
| CS6 Providing quality homes | Objective 2, 6 & 7 Policy 5, 6, 17, 18, 19, 20, 21, 24 & 25 |
| CS7 Promoting Camden's centres and shops | Objective 1 & 5 Policy 2, 3, 14, 15, 16, 17 & 18 |
| CS8 Promoting a successful and inclusive Camden economy | Objective 1, 3, 6 & 7 Policy 1, 2, 3, 5, 7, 14, 15, 17, 18, 19, 20, 21, 22, 23, 24 & 25 |
| CS9 Achieving a successful Central London | (not relevant) |
| CS10 Supporting community facilities and services | Objective 4 & 5 Policy 9, 10, 12, 13, 15, & 16 |
| CS11 Promoting sustainable and efficient travel | Objective 3 Policy 8, & 15 |
| CS12 Sites for gypsies and travellers | (not relevant) |
| CS13 Tackling climate change through promoting higher environmental standards | Objective 2, 4, 6 & 7 Policy 6, 9, 10, 11, 17, 18 & 25 |
| CS14 Promoting high quality places and conserving our heritage | Objective 2, 4, 5, 6 & 7 Policy 4, 6, 7, 9, 10, 11, 14, 16, 23 & 25 |
| CS15 Protecting and improving our parks and open spaces and encouraging biodiversity | Objective 4 Policy 4, 9, 10 & 11 |
| CS16 Improving Camden's health and well-being | Objectives 3, 4 & 5 Policy 4, 8, 9, 10, 11 & 13 |
| CS17 Making Camden a safer place | (not relevant) |
| CS18 Dealing with our waste and encouraging recycling | (not relevant) |
| CS19 Delivering and monitoring the Core Strategy | Objective - all Policy - all |

▲ Table 3

Town NP is in general conformity with the strategic policies of the Council's LDF. It is worth noting that the emerging Camden Local Plan has included a proposal promoting mixed-use development in part of the designated Industry Area.

Strategic Environmental Assessment

Strategic Environmental Assessment is a requirement of the EU Directive on the assessment of certain plans and programmes on the environment. The requirements of this Directive have been incorporated within the Sustainability Appraisals undertaken for the Submission Drafts of the Camden Core Strategy and Camden Development Policies (January 2010). The purpose of a sustainability appraisal is to ensure that the principles of sustainable development have been

considered throughout the plan making process by the integration of social, economic and environmental considerations. The sustainability appraisals demonstrate how the policies in the Camden Core Strategy and Development Policies align with 16 sustainability objectives. As a statutory planning document that must be compliant with the strategic planning policies of Camden Council, the Neighbourhood Plan should also contribute to these sustainability objectives where appropriate.

A screening process was carried out by the local planning authority to determine whether a Strategic Environment Assessment (SEA) would be required in support of the plan. It was determined that the Kentish Town Neighbourhood Plan is likely to have a significant environmental effects and that, as such, an SEA is required for this Neighbourhood Plan. The

screening statement issued by Camden Council is attached as Appendix 1.

An SA Scoping Report was consulted upon in January 2015. This was submitted to the statutory environmental bodies: Historic England (formerly English Heritage), Natural England and the Environment Agency and was made publicly available.

An SA Framework was established as part of this scoping process to test the Neighbourhood Plan. This was based on the framework used in the Camden Core Strategy SA.

A full Sustainability Appraisal of policy options was conducted to inform the Pre-Submission Draft (Regulation 14). The draft was published in March 2015 for a six week period of consultation. A number of proposed changes arose in response to the comments made during the consultation and further evidence gathering. The impacts of further proposed changes to the plan have been evaluated through a revised version of the sustainability appraisal. This forms the Sustainability Appraisal Report which accompanies the Submission Draft.

A summary of the findings of the SEA

The Plan has been through an iterative process of sustainability assessment considering the social, economic and environmental effects of the plan. This has helped avoid and mitigate any adverse environmental effects and maximise the positives through the plan’s development.

Table 4 below summarises the key findings of the Strategic Environmental Assessment. This forms part of the submission to Camden Council. The assessment is structured under 10 sustainability “topic” headings.

The SEA was updated on 23 November 2015, since Table 4 was drawn up. The findings of all 10 sustainability assessments are that “these conclusions hold true at the current time”. However, some text has been added to the assessments. To summarize:

The open spaces on estates policy may produce benefits for estates’ residents that may also relate to biodiversity. Development on the Kentish Town Potential Development Area (KTPDA) will be expected to achieve a reduction in carbon dioxide emissions and also addressed is provision of new educational institutions and healthcare facilities. Changes made to the KTPDA policy are supportive of economy objectives, are less prescriptive in respect of building heights, require provision of affordable housing and housing for the elderly, green and open spaces and leisure facilities. Access and linkage routes for footpaths and cycle ways are required, and any development will be car free, apart from parking for essential and Blue Badge permit holders.

Land availability assessment

Local planning authorities are required to identify a future supply of land for housing and employment

| Sustainability topic heading | Conclusion/Recommendation |
|--|--|
| Air quality, noise and other environmental issues | Not predicted to negatively affect air quality or noise through development but is likely to increase both through enhancement of public realm and cycling infrastructure |
| Biodiversity | The Plan is likely to have a significant positive effect on biodiversity in the area. Decking over the railway corridor has the potential to have significant negative effects on biodiversity |
| Climate change mitigation (non-transport related) | The Plan policies make appropriate provision for climate change |
| Community and well-being | Overall, the Plan would have a significant positive effect |
| Economy | Overall, the Plan would have a significant positive effect |
| Heritage | Overall, the Plan would have a positive effect |
| Housing | Overall, the Plan would have a significant positive effect |
| Landscape/townscape | Overall, the Plan would have a significant positive effect |
| Transport | Overall, the Plan would have a significant positive effect |
| Water, flood risk and other climate change adaption issues | Overall, the Plan is considered not to have any effect |

▲ Table 4

uses by undertaking a ‘land availability assessment’ for the intended future uses. This is used to ensure that all potential sites are identified and tested on an equitable basis against a transparent set of criteria. Sites holding the greatest potential for development – sites which are considered to be suitable, available

and achievable would normally be brought forward as site allocations.

The National Planning Practice Guidance advises that designated neighbourhood forums may use the methodology to assess sites but that any assessment should be proportionate.

EU OBLIGATIONS

Habitat Regulations Assessment

The NP is considered to be compatible with EU Habitats Directive. The neighbourhood plan is not likely to have a significant effect on a European site(as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, & c.) Regulations 2007, either alone or in combination with other plans or projects .

An HRA was undertaken for Camden Council’s Local Development Framework documents and concluded that they would be unlikely to have significant effects on wildlife. As the KTNP is intended to be in conformity with the LDF then a

separate HRA is not considered necessary. Compatibility with human rights requirements

The Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights. It also complies with the Human Rights Act.

Camden Council has undertaken an Equalities Impact Assessment (EIA) for the plan’s effects on individuals and groups with protected characteristics. {This is attached as Appendix 2}

The Plan has sought to minimise any negative impacts and minor changes have been made to the Plan in response to the recommendations made by the Council in the EIA.

CONCLUSIONS

This Neighbourhood Plan has been produced by the community through consultations over a period of more than three years. Two main themes emerged very early on – namely the need to retain and increase employment space and to increase the supply and affordability of new housing. The Policies set out in this Plan aim to meet these prime needs in an area that has extremely limited land resources available for potential development.

The Plan also takes a forward looking approach by identifying new development opportunities to unlock currently unavailable land i.e. The Murphy Site – SP2 (currently protected for industrial use) and

The Railway Lands – D2. It is possible that these opportunities may come forward within the life of this Plan as the demand for employment space and housing increases.

The Policies have been drafted taking into account national and local planning policies and are considered to be in conformity with these policies.

The Strategic Environmental Assessment indicates that the Plan would have a significant positive effect on the area.

Taking all these together, we consider that the Plan is in conformity with the relevant regulations and should be approved accordingly.

APPENDIX 1

Kentish Town Neighbourhood Development Plan
Strategic Environmental Assessment Screening Report
October 2014



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1. Introduction

- 1.1 This screening report considers whether the Kentish Town Neighbourhood Development Plan requires a Strategic Environmental Assessment (SEA).
- 1.2 A Strategic Environmental Assessment is required for plans and programmes that are determined likely to have significant environmental effects, in accordance with European Directive 2001/42/EC. It is the Council's responsibility to identify whether an SEA should be undertaken for a neighbourhood plan (a process known as "screening"). We will consult statutory bodies (the Environmental Agency, English Heritage and Natural England) on the results of this initial screening assessment.
- 1.3 Whether a neighbourhood plan requires a strategic environmental assessment will depend on what is proposed in the draft plan. National Planning Policy Guidance on neighbourhood planning states that a strategic environmental assessment may be required, for example, where:
 - a neighbourhood plan allocates sites for development
 - the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
 - the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 1.4 The screening process is based upon consideration of the standard criteria in Annex II of the Directive to determine whether the plan is likely to have "significant environmental effects."
- 1.5 One of the basic conditions for a neighbourhood plan, which are tested at examination by an independent examiner, is whether the plan is compatible with European Union obligations, which include the Strategic Environmental Assessment Directive.

2. Vision, objectives and priorities of the plan

- 2.1 The stated purpose of the Kentish Town Neighbourhood Development Plan is to "further the social, economic and environmental well-being of individuals, businesses and organisations living and working within the Forum Area. The Area has a strong character as one of London's old villages, with a diverse population, a reasonably thriving high street, a young population and excellent links with the rest of London and proximity to major tourist attractions, parks and employment centres. This Plan seeks to reinforce these positive aspects of the area and create a framework for continuing regeneration and growth of the Area over the next 15 years."

2.2 The draft Kentish Town Neighbourhood Development Plan specifically considers the following:

- shopping & working;
- design;
- housing;
- getting around;
- green & open spaces;
- community & culture; and
- site proposals.

3. Assessment

3.1 The Council must determine whether the plan or programme, in this case the Kentish Town Neighbourhood Development Plan, is likely to have significant environmental effects with reference to the criteria specified in Schedule 1 of the SEA Regulations. These criteria are set out in the table below, and consideration of likely impact of the neighbourhood plan is given for each criteria.

| SEA criteria | Issues | Likely significant impact? |
|---|--|----------------------------|
| 1. The characteristics of plans and programmes having regard, in particular, to: | | |
| a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources | <p>The draft Neighbourhood Development Plan sets a framework for projects and activities in the neighbourhood area.</p> <p>It includes the allocation of new sites with requirements that go beyond those in the Council's Site Allocations document.</p> <p>Also, some policies such as Site Proposal 8, which seeks to protect particular open/green spaces, are considered to extend beyond the Council's current development plan requirements.</p> <p>The environmental impacts of these approaches would not have been tested in the sustainability appraisal of Camden's plans. The Council</p> | Yes |

| | | |
|--|--|----|
| | therefore considers that the environmental impacts of these policies and allocations should be assessed through an SEA. | |
| b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy | <p>The draft Neighbourhood Development Plan will evolve alongside the early stages of Camden's Local Plan review.</p> <p>The draft Neighbourhood Development Plan may form the context for other documents for this area. However, we consider that its degree of environmental impact in relation to this criterion is unlikely to be significant.</p> | No |
| c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development | <p>If passed at referendum, the Plan will sit alongside the Council's current development plan documents which have undergone assessment of their impact on sustainable development, including SA/SEA assessments (through the SAs of the Camden Core Strategy, Development Policies and Site Allocations documents).</p> <p>However, we consider that the policies in the Neighbourhood Plan are unlikely to have a significant impact upon this criterion.</p> | No |
| d) Environmental problems relevant to the plan or programme | The draft neighbourhood plan seeks to address some environmental problems within Kentish Town, such as increasing/protecting open/green space. It is considered however that there is not a requirement for an SEA under this criterion. | No |
| e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection). | The policies within the plan are not relevant or related to the implementation of Community legislation on the environment. | No |

| | | |
|--|--|-----|
| 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: | | |
| a) The probability, duration, frequency and reversibility of the effects | <p>The draft plan includes the allocation of new sites with requirements that go beyond those in the Council's Site Allocations document.</p> <p>Also, some policies such as Site Proposal 8, which seeks to protect particular open/green spaces, are considered to extend beyond the Council's current development plan requirements.</p> <p>The environmental impacts of these approaches would not have been tested in the sustainability appraisal of Camden's plans. The Council therefore considers that the environmental impacts of these policies and allocations should be assessed through an SEA.</p> | Yes |
| b) The cumulative nature of the effects | <p>It is considered that there are likely to be cumulative impacts arising from the policies within the neighbourhood plan itself and combined with Camden's current development plans.</p> <p>Cumulative effects occur where several policies or site allocations, when put together, have a significant combined effect.</p> <p>Therefore, the likely cumulative effects of the draft neighbourhood plan should be assessed through an SEA.</p> | Yes |
| c) The trans-boundary nature of the effects | It is considered that there are unlikely to be trans-boundary effects arising from the Plan. | No |
| d) The risks to human health or the environment (e.g. due to accidents) | It is considered that there are unlikely to be risks to human health or the environment arising from the Plan. | No |
| e) The magnitude and spatial | The plan area stretches beyond the | Yes |

| | | |
|--|--|-----|
| extent of the effects (geographical area and size of the population likely to be affected) | boundaries of the existing Kentish Town Ward, which has a population of 13,417 (2011 Census). A population of this size is considered significant. | |
| f) The value and vulnerability of the area likely to be affected due to: i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards or limit values iii) intensive land-use | Listed buildings are considered to have high cultural heritage value. The plan area contains a number of listed buildings including Kentish Town Police Station which has been included as a site allocation. It is therefore considered that an SEA is required under this criterion. | Yes |
| g) The effects on areas or landscapes which have a recognised national, Community or international protection status | There are no landscapes of national or international protection status in the Plan area (although the area has a number of green and open spaces which are highly valued by the local community). | No |

4. Screening outcome

4.1 Having reviewed the criteria the Council considers that the Kentish Town Neighbourhood Development Plan is likely to have significant environmental effects and accordingly will require a Strategic Environmental Assessment.

4.2 There are policies and site allocations in the draft Neighbourhood Development Plan that are not included within the Council's Site Allocation document or extend beyond the Council's current plan requirements. The environmental impacts of these have not been tested in the sustainability appraisal of Camden's plans.

4.3 As such, an SEA of these parts of the neighbourhood plan is required under the following SEA criteria:

- 1a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- 2a) the probability, duration, frequency and reversibility of the effects;
- 2b) the cumulative nature of the effects;

- 2e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected); and
- 2f) the value and vulnerability of the area likely to be affected due to:
 - i) special natural characteristics or cultural heritage.

4.4 As the Council's adopted planning policies have been subject to an SA / SEA, no further SEA is required for policies and allocations in the neighbourhood plan that are consistent with the Council's policies.

4.5. This determination has also been subject to consultation with the statutory consultation bodies. The consultation bodies, specified in the Environmental Assessment of Plans and Programmes Regulations 2004, that will be consulted on this Screening Determination for the Kentish Town Neighbourhood Plan are as follows:

- Natural England
- English Heritage
- Environment Agency

4.6. The responses from the consultation bodies were received in October-November 2014 and are set out below.

Natural England

The council has indicated that the Plan does allocate sites for development, and has identified local issues not covered by the Council's Local Plan; therefore there may be an environmental impact that will need to be considered. In respect of this submission, and on the basis of the details provided, Natural England agrees with the Council's conclusion that a Strategic Environmental Assessment will be required.

English Heritage

On the basis of this information provided we agree that, as the proposed Neighbourhood Plan introduces the allocation of new sites not included within the Council's Site Allocations document, strategic environmental assessment is required as set out under the criteria specified in Schedule 1 of the SEA regulations.

Environment Agency

Based on an environmental constraints check for which we are a statutory consultee, there are no areas of fluvial flood risk, Source Protection Zones for groundwater or main rivers present. Therefore we do not consider there to be potential significant environmental effects for this area relating to these environmental constraints.

Your Surface Water Management Plan will indicate if there are any critical drainage areas from local sources of flood risk (e.g. surface water, groundwater and sewerage) which coincide with the area.

4.7. Responses from Natural England and English Heritage agree that an SEA is necessary. The Council agrees with the Environment Agency (EA) that the plan has little environmental effect under SEA criterion 1d. As advised by EA, we have reviewed our Surface Water Management Plan and can confirm that none of the sites proposed within the draft plan are located in areas identified as at significant risk of flooding. It should be noted however that the Murphy site (Site Proposal 1: Kentish Town Industrial Area) borders the Gospel Oak Local Flood Risk Zone.

4.8. The SEA criterion set out in para 4.3 above therefore remain unchanged as a result of consultation with the statutory bodies.

5. Appendix



ENGLISH HERITAGE

London Office

Mr Benjamin Vickers
 Planning Policy Officer
 Strategic Planning and Implementation
 Regeneration and Planning
 2nd Floor, 5 St Pancras Square
 London
 N1C 4AG

Your ref:
 KTNF SEA

Telephone 020 7 973 3717

06 November 2014

Dear Mr Vickers

**London Borough of Camden
 Strategic Environmental Assessment Screening of the Kentish Town Neighbourhood Plan
 –SEA Screening Opinion**

Thank you for consulting English Heritage on the Scoping Opinion for the Kentish Town Neighbourhood Forum (SEA). As the Government's advisor on the historic environment and a statutory consultee in regard of SEA we are pleased to provide comment on this document.

As the Government's adviser on all matters pertaining to the historic environment and a consultation body for the purposes of Regulation 10(4) of the Town and Country (Environmental Impact Assessment) (England and Wales) Regulations 1999 ("the EIA Regulations"), English Heritage writes to inform the London Borough of Camden's Scoping Opinion on the Environmental Statement for the Proposed Neighbourhood Plan for Kentish Town, London.

On the basis of this information provided we agree that, as the proposed Neighbourhood Plan introduces the allocation of new sites not included within the Council's Site Allocations document, strategic environmental assessment is required as set out under the criteria specified in Schedule 1 of the SEA regulations.

It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your scoping opinion.

Yours sincerely

Richard Parish
 Historic Places Adviser
 E-mail: richard.parish@english-heritage.org.uk

creating a better place



London Borough of Camden
 Strategic Planning and Implementation
 Regeneration and Planning
 Via email: PlanningPolicy@Camden.gov.uk

Our ref: NE/2007/102642/SE-04/DS1-L01

Date: 20 October 2014

Dear Benjamin,

Kentish Town Neighbourhood Plan - SEA Screening

Thank you for consulting us on the draft SEA screening report.

Based on an environmental constraints check for which we are a statutory consultee, there are no areas of fluvial flood risk, Source Protection Zones for groundwater or main rivers present. Therefore we do not consider there to be potential significant environmental effects for this area relating to these environmental constraints.

Your Surface Water Management Plan will indicate if there are any critical drainage areas from local sources of flood risk (e.g. surface water, groundwater and sewerage) which coincide with the area.

We have published joint advice with Natural England, English Heritage and the Forestry Commission on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

<http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Yours sincerely

Michael Devanny
Planning Advisor
 Direct dial: 0203 263 8105
 Direct e-mail: northlondonplanning@environment-agency.gov.uk

Environment Agency - Apollo Court, 2 Bishops Sq Business park, Hatfield, Herts, AL10 9EX.



Date: 20 October 2014
 Our ref: 134471
 Your ref:



Customer Services
 Hornbeam House
 Crewe Business Park
 Electra Way
 Crewe
 Cheshire
 CW1 6JC

T 0300 060 3900

Mr Benjamin Vickers
 Planning Policy Officer
 Strategic Planning & Implementation
 Regeneration and Planning
 2nd Floor, 5 St Pancras Square
 London
 N1C 4AG

BY EMAIL ONLY

Dear Mr Vickers,

Kentish Town Neighbourhood Plan - Strategic Environmental Assessment Screening

Thank you for your recent correspondence dated 14 October 2014 in respect of the above consultation, seeking the views and comments of Natural England with regards to the Strategic Environmental Assessment (SEA) Screening for the Kentish Town Neighbourhood Plan.

Natural England must be consulted by the Local Planning Authority on planning applications that may impact on nationally protected nature conservation sites, and applications that require an Environmental Impact Assessment.

You have indicated that the Plan does allocate sites for development, and has identified local issues not covered by the Council's Local Plan; therefore there may be an environmental impact that will need to be considered. In respect of this submission, and on the basis of the details provided Natural England agrees with the Council's conclusion that a Strategic Environmental Assessment will be required.

However, should the Plan be altered or further development sites identified and proposed, Natural England expects to be re-consulted.

Below is offered general advice for consideration by those communities who may wish to undertake a Neighbourhood Plan.

Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. This is available at: <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Local environmental record centres hold a range of information on the natural environment. A list of local records centre is available at: <http://www.nbn-nfbr.org.uk/nfbr.php>

Subject to the above, Natural England has no further substantive comments to make in respect of this consultation document

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

For clarification of any points in this letter, please contact David Hammond on 0300 060 1373. For any new consultations or issues, please contact consultations@naturalengland.org.uk.

Yours sincerely

David Hammond
Lead Advisor
Sustainable Development and Regulation
Thames Valley Team




Basic Conditions Statement 2

November 2015

APPENDIX 2

Equality Impact Assessments - equality through public services



Our approach

Equality impact assessments (EIAs) are our chosen way for working out the effect our policies, practices or activities (the word activity will be used throughout this form as an umbrella term) might have on different groups before we reach any decisions or take action. They are an important service improvement tool, making sure that our services are as effective as they can be for everyone Camden serves. They also help to prevent us from taking action that might have outcomes we did not intend.

It is essential that you start to think about the EIA process before you develop any new activity or make changes to an existing activity. This is because the EIA needs to be integral to service improvement rather than an 'add-on'. If equality analysis is done at the end of a process it will often be too late for changes to be made.


If a staff restructure or organisational change is identified as necessary following the review of an activity then an EIA needs to be completed for both stages of the process, i.e. one when the activity is reviewed and one when the restructure or organisational change is undertaken.

Please read the council's EIA guidance, ['Equality impact assessments – equality through public services, a step-by-step guide'](#), before beginning the EIA process.

Stage one - what is being analysed and who is responsible for the equality impact assessment?

This section should be completed to help you plan how you will analyse an activity.

| | |
|---|--|
| Name of the activity being analysed | Kentish Town Neighbourhood Plan |
| Service and directorate responsible | Planning and Regeneration, Culture and Environment |
| Names and posts of staff undertaking the assessment | Andrew Triggs, Principal Planner, Strategic Planning and Information |
| Date assessment completed | September 2015 |
| Name of person responsible for sign off of the EIA | Frances Wheat, Assistant Director Planning and Regeneration |



Stage two - planning your equality analysis

This section of the form should be completed when you are developing your proposals for assessing the activity.

The information you will need to collect should be proportionate to the activity that you are looking at. A small change in policy, for example, does not need to be supported by the same amount of evidence and analysis as a major change in service provision.

Outline the activity being assessed

This part of the Assessment considers generally what the activity entails and how it might impact on equality.

Under the Equalities Act 2010, the nine protected characteristics covered by the general equality duty are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. People with common protected characteristics are often described as belonging to a protected group.

The Localism Act, which received Royal Assent on November 15 2011, introduced new rights and powers to allow local communities to shape new development by coming together to prepare neighbourhood plans. On 10 April 2013, the London Borough of Camden approved the designation of the Kentish Town Neighbourhood Area and the Neighbourhood Forum. The Neighbourhood Forum has prepared a neighbourhood plan for their area which was developed through extensive consultation with the local community and stakeholders.

A requirement for neighbourhood plans is to be in general conformity with Camden's strategic planning policies. The Core Strategy and Development Policies documents (adopted 2010) were developed with the undertaking of an Equalities Impact Assessment (EIA) and as such the effects of policies on protected characteristics would have been tested. Nonetheless this assessment will provide a focus on the effects of the plan in this localised area of Camden.

The Kentish Town Neighbourhood Plan (KTNP) provides planning policies and guidance at a local level and once 'made', the neighbourhood plan will form part of Camden's development plan. The Vision of the Neighbourhood Plan is:

"Kentish Town has the potential to be a fantastic place to live and work, full of history, galleries, pubs, restaurants, music venues, shops and thriving businesses. It is on the doorstep of many famous places, with numerous transport links close to places of employment and entertainment. It has the potential for a diverse but balanced population of young and old in a mix of housing ranging from private to affordable. Space is at a premium with immense pressure to build new housing, but at the same time we have to make efforts to retain existing employment space and protect our green and open spaces. We want young people to be able to stay in the area and not to be forced out through high rents. We want as many people as possible to be involved in creating the policies that will shape our environment for the next fifteen years. We want to protect what is good about Kentish Town and through the Plan to foster positive and innovative developments over the next fifteen years that will enhance the well-being of individuals living and working here".

The Kentish Town Neighbourhood Plan has the potential to impact upon equality as its implementation will affect all those who live, work, study or visit the neighbourhood area.

Gather relevant equality data and information

This part of the assessment considers data about protected characteristics and groups in the area covered by the plan, and information about other themes particularly likely to affect protected groups and characteristics.

The neighbourhood planning area comprises the majority of Kentish Town ward (except an area to the NW which coincides with part of the J Murphy site between the Gospel Oak-Barking and North London Overground lines). To the south, it includes a sliver of land extending into Camden Town with Primrose Hill ward and there is a very small area to the west which extends into Gospel Oak ward. To the south east, there is a significant area which forms part of Canteloves ward. This includes three streets running parallel to each other (Gaisford Street, Patshull Road and Lawford Road) which join Bartholomew Road to the east. This area includes Canteloves Gardens Public Open Space and Camden School for Girls in Sandall Road. Much of the area lies within the Bartholomew Estate Conservation Area. For the purposes of the EIA, the majority of the data analysis relates to Kentish Town, although key statistics for Lower Layer Super Output (LSOA) areas in Canteloves are given (LSOA area 009B is the best fit). Due to the size of the area, we have not included data relating to other wards.

Information for this assessment has been largely gathered from the 2011 Census and the Scoping Report of the draft Local Plan Sustainability Appraisal. Other evidence gathered for the preparation of the Local Plan is published on the Council's website.

Data about protected characteristics

Age

| Age | Kentish Town | Camden | Greater London | National | |
|-------|--------------|--------|----------------|----------|--------------|
| 0-3 | 4.9% | 4.9% | 5.9% | 5.0% | Children |
| 4-10 | 6.5% | 7.0% | 8.4% | 7.9% | |
| 11-15 | 4.4% | 4.2% | 5.6% | 5.9% | Young people |
| 16-18 | 2.9% | 2.9% | 3.4% | 3.8% | |
| 19-24 | 10.0% | 11.9% | 8.9% | 8.1% | Working age |
| 25-49 | 48.16% | 44.8% | 42.3% | 34.7% | |
| 50-64 | 13.4% | 13.4% | 14.4% | 18.1% | |
| 65-74 | 5.5% | 5.9% | 5.8% | 8.7% | Older People |
| 75-84 | 3.1% | 3.6% | 3.8% | 5.6% | |
| 85+ | 1.1% | 1.4% | 1.5% | 2.2% | |

The age structure of Kentish Town broadly follows the distribution in Camden as a whole. There is a particular high proportion of people in the working age categories; significantly higher than the benchmarks for Greater London and England and Wales. There is also a smaller elderly population in Kentish Town: 9.7% of the population is over the age of 65 compared to 11.1% in Greater London and 16.5% nationally.

Kentish Town generally has a young population. The most frequent ages were 30 (469 residents), 29 (437 residents) and 31 (381 residents). In fact the 15 most common ages by year were between 22 and 39. This mirrors the high representation of residents in their twenties and thirties in Camden and the three most common ages were also 30, 29 and 31 (although the Borough profile is biased towards even younger residents). This is considerably younger than the most common ages in England - 46, 45 and 44. Nationally the 15 most common ages are over 29 years of age.

Canteloves ward part of Neighbourhood Area (using Lower-layer Super Output Area 009B)

The proportion for each age group is as follows:

| Age | % |
|-------|------|
| 0-3 | 4.2 |
| 4-10 | 6.0 |
| 11-15 | 5.7 |
| 16-18 | 3.3 |
| 19-24 | 9.2 |
| 25-49 | 44.7 |
| 50-64 | 16.7 |
| 65-74 | 6.2 |
| 75-84 | 3.0 |
| 85+ | 1.0 |

Disability

During 2011, 14.4% of Kentish Town residents stated that their day-to-day activities were limited due to a health problem or disability which has lasted, or will last at least 12 months. This is the same as in Camden but lower than the percentage of the population in England and Wales at 17.9%.

In Kentish Town 959 of residents considered a disability limited their activities a lot (7.1%) but 970 considered it limited their activities a little (7.2%). This compares to 8.3% who consider a disability limits their activities a lot in England and Wales and 9.3% of the population who consider a disability limits their activity a little.

Neighbourhood Statistics records the number of people in the population in receipt of Disability Living Allowance. This is a benefit, although now largely withdrawn, which contributed to mobility and care costs. In August 2012, 5.2% of Kentish Town's population claimed this benefit, slightly above the rate for Camden (4.7%) and London (4.1%) but almost mirroring the national (England) average (5.1%).

Canteloves ward

18% of residents stated their day-to-day activities were limited due to a health problem or disability which has lasted, or will last at least 12 months.

9.5% of the population in the area claimed Disability Living Allowance.

Gender reassignment

No data is available regarding gender reassignment.

Marriage and civil partnership

The 2011 Census indicated that Kentish Town had a much lower proportion of married couples (23.8%) compared to Greater London (39.8%) and England and Wales (46.6%). 60.8% of all residents were single (never married or never registered in a same-sex civil partnership). This is higher than all comparators and nearly double the level recorded in England (34.6%).

There was a higher proportion of the population in a same-sex civil partnership (1.3%) than in Greater London (0.4%) and England and Wales (0.2%).

Canteloves ward

26% of residents were married and 47% were single. Less than 0.01% were registered in a same-sex civil partnership.

Pregnancy and maternity

The percentage of lone parent households was 7.4%. This is higher than the proportion of households in Camden (6.4%) and England and Wales (7.2%), however this is lower than Greater London (8.5%).

The rate of teenage conceptions was not significantly different to the average for England and Wales (2011 Census).

Cantelowes ward

The % of lone parent households is 12%. There is no data for teenage conceptions at this level.

Race

| | | Kentish Town | Camden | Greater London | National |
|------------------------------|---------------------------|--------------|--------|----------------|----------|
| Ethnicity | | | | | |
| White groups | White British | 52.6% | 44.0% | 44.9% | 80.5% |
| | White Irish | 4.1% | 3.2% | 2.2% | 0.9% |
| | Gypsy/Irish Traveller | 0.1% | 0.1% | 0.1% | 0.1% |
| Mixed/multiple ethnic groups | White Other | 14.7% | 19.0% | 12.6% | 4.4% |
| | White and Black Caribbean | 1.5% | 1.1% | 1.5% | 0.8% |
| | White and Black African | 0.9% | 0.8% | 0.8% | 0.3% |
| | White and Asian | 1.7% | 1.8% | 1.2% | 0.6% |
| Asian groups | Other Mixed | 2.1% | 1.9% | 1.5% | 0.5% |
| | Indian | 1.8% | 2.8% | 6.6% | 2.5% |
| | Pakistani | 0.5% | 0.7% | 2.7% | 2.0% |
| | Bangladeshi | 4.5% | 5.7% | 2.7% | 0.8% |
| | Chinese | 1.1% | 2.9% | 1.5% | 0.7% |
| Black groups | Other Asian | 3.1% | 4.0% | 4.9% | 1.5% |
| | Caribbean | 1.6% | 4.9% | 7.0% | 1.8% |
| | African | 5.2% | 1.6% | 4.2% | 1.1% |
| Other Ethnic Groups | Other Black | 1.5% | 1.7% | 2.1% | 0.5% |
| | Arab | 1.4% | 1.6% | 1.3% | 0.4% |
| | Any Other Ethnic Group | 1.7% | 2.3% | 2.1% | 0.6% |

Kentish Town's population is ethnically very diverse. Over half of the population described themselves as 'White British'. This is somewhat higher than in Camden as a whole and Greater London but is much lower than the comparator for England and Wales. There are significant minorities of 'White Irish' (4.1%), 'White Other' (14.7%), 'Bangladeshi' (4.5%) and 'African' (5.2%) residents. The White Irish population is proportionately double that in Greater London and over four times larger than the proportion of the national population. The percentage of 'White Other' residents is lower than the proportion in Camden but higher than Greater London. The Bangladeshi population is slightly smaller than the Camden average but significantly higher than the proportion of the residential population in Greater London and England and Wales. The African population is higher than all the comparators. The Chinese Indian and especially Caribbean ethnic groups are less represented in Kentish Town than Camden.

65.8% of Kentish Town's population was born in the United Kingdom compared to 57.5% in Camden and 86.2% in England. 2.7% of the population was born in Ireland. 12.6% of the population was born in European

countries (other than the UK, Ireland, Channel Isles and IOM). 5.8% of the population stated they were born in Africa. This included a significant Somali (208 residents) and South African (151 residents) population. 2.1% of the population was born in Bangladesh (295 residents). There are also significant numbers of residents born in south east Asian countries (194 residents, including a significant number born in the Philippines), the United States (223 residents) and Australia (170 residents).

81% of Kentish Town residents stated their main language was English. The most common main European languages spoken were Greek (273 residents), French (218 residents), German (157 residents) and Spanish (135 residents). There was a high number of residents who stated Bengali was main language (294 residents); there was also a number of East Asian languages represented (including Tagalog/Filipino - 51 residents and Japanese - 51 residents). Somali was by far was most frequently cited African language.

Cantelowes ward

74% of residents are from White ethnic groups, 10% from Black ethnic groups, 7.6% from Asian ethnic groups, 5.8% from Mixed groups and 1.5% from Other ethnic groups.

Religion

| | Kentish Town | Camden | Greater London | National |
|-----------------|--------------|--------|----------------|----------|
| Christian | 32.5% | 34.0% | 48.4% | 59.3% |
| Buddhist | 1.1% | 1.3% | 1.0% | 0.4% |
| Hindu | 0.5% | 1.4% | 5.0% | 1.5% |
| Jewish | 1.6% | 4.5% | 1.8% | 0.5% |
| Muslim | 9.7% | 12.1% | 12.4% | 4.8% |
| Sikh | 0.1% | 0.2% | 1.5% | 0.8% |
| Other religions | 0.6% | 0.6% | 0.6% | 0.4% |
| No religion | 34.0% | 25.5% | 20.7% | 25.1% |
| Not Stated | 19.9% | 20.5% | 8.5% | 7.2% |

Kentish Town has a diverse religious population with a very high proportion of the population stating they have no religion. 32.5% of the population described themselves as 'Christian', far lower than the national and Greater London average. There was a smaller Muslim population than in the rest of Camden and London but still significantly greater than the national average. The Hindu and Sikh populations were much lower than reported in London.

Cantelowes ward

37% of the population identified themselves as 'Christian', 31.8% stated 'No religion', 20% did not state a religion, 8.2% identified themselves as 'Muslim'. All other religions accounted for less than 1% of the population.

Sex/gender

The resident population of Kentish Town is 13,417 of which 48% is male and 52% is female.

Cantelowes ward

54% of the population is male and 46% female.

Sexual orientation

The 2009 Camden Talks survey (based on a representative panel of 2,000 residents, with responses weighted to reflect the Borough's demographic profile), found that 76% of the panel considered themselves heterosexual, 6% gay or lesbian and 1% bisexual. Camden's Lesbian, Gay, Bisexual and Transgender (LGBT) Forum estimates the Borough's homosexual, bisexual and transgender profile to be between 10-12% due to Camden's location, diversity and developed LGBT social capital.

The 2011 Census records there were 143 residents in Kentish Town in a registered same-sex civil partnership.

Cantelowes ward

Less than 0.01% were in a registered same-sex civil partnership.

Information about other themes likely to affect protected groups

Crime

The police.uk website provides statistical data relating to recorded crime and crime prevention priorities at a neighbourhood level.

Consultation with the local community by the Metropolitan Police Service (MPS) identified the following issues as priorities for the area:

- Pedal cycling on the pavement
- Anti-social behaviour related to alcohol
- Anti-social behaviour in general

The MPS provides a breakdown of incidents of recorded crime by month for Kentish Town. In the year ending July 2015, the lowest number of offences occurred in April (110); the highest number of offences were recorded in October (180) and November (188). The most common type of crime was anti-social behaviour (466 incidents or 25.8% of all recorded crimes), followed by violence and sexual offences (351 incidents or 19.4% of crimes). There were over hundred incidents during the year involving 'burglary', 'criminal damage and arson', 'other theft', 'public order' and vehicle crime'.

The levels of recorded crime are greater than some of Camden's most affluent wards such as Highgate, Hampstead Town and Belsize but far less than in Camden Town and wards to the south of the Borough (Holborn and Covent Garden and Bloomsbury). 2014 data.

During Summer 2015, the total number of notifiable offences was 103 in June, 112 in July and 111 in August.

The Kentish Town Place Plan (2012) identified that anti-social behaviour on housing estates was a particular problem. There was also concern about visible drug-dealing, ticket-touting, alcohol related violence and illegal cabs. Serious crime and burglary was also considered to be a concern in some parts of the area.

Cantelowes ward

The equivalent level of notifiable offences during Summer 2015 was 105 in June, 87 in July and 75 in August. In 2014/15 the annual crime count was 1029. This is lower than Kentish Town ward (1,234) and far lower than in Camden Town with Primrose Hill ward (3,890).

Health

Over 50% of Kentish Town residents considered they are in 'Very Good Health' and a further 31% consider their health to be 'Good'. These figures are on a par with LB Camden but outperform the London and

England benchmarks. This is highly likely to be related to Kentish Town and Camden's generally younger age profile (2011 Census).

Cantelowes ward

The general health data for Cantelowes is broadly similar to Kentish Town; there are slightly fewer residents who consider themselves to be in 'Very Good Health' (48%).

Housing

In 2011, there were 5,793 households in Kentish Town. The percentage of owner occupation was 34.7% (the majority owned with a mortgage or loan). This is slightly higher than the average for Camden (32%) but lower than the level in Greater London (48%) and much below the average for England (63.3%). 33% were living in social rented accommodation (the majority renting from Camden Council) - this is in line with the proportion for the Borough but higher than Greater London (24%) and England (17.7%). There is also a very significant proportion of households occupying privately rented housing (from a private landlord or letting agency) - 30% in Kentish Town and 32% in Camden; in England the rate is only 17%.

Cantelowes ward

In 2011, there were 774 households in this part of the ward. The percentage of owner occupation was 33%, 45% were living in social rented accommodation and 20% privately renting.

Gypsies and Travellers

Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Equalities Act 2010. There is one small site in Castlehaven Road providing 1 pitch.

Cantelowes ward

There are no Gypsy or Traveller sites in this area.

Consultation and engagement

This part of the Assessment considers consultation at the various stages of the Plan's preparation, and how far it has included engagement with protected groups.

The Kentish Town Neighbourhood Forum (KTNF) identified the following principles to guide their community engagement:-

- To 'front-load' consultation so that the Plan was informed by the views of local people and other stakeholders from the start of the consultation process;
- To ensure that consultation events took place at critical points in the process where decisions needed to be taken;
- To engage as wide a range of people as possible, using a variety of events and communication techniques;
- To ensure that the results of consultation were fed back to local people and available to read (via the KTNF website and in hard copy in Kentish Town Library, Kentish Town Community Centre and the Somali Youth Centre Kentish Town) as soon as possible after the consultation events.

The Forum's written constitution enshrined a series of objectives to guide future action. One of these refers to the promotion of social benefit through building stronger community links, including "services for young people" and "the generation of neighbourliness and companionship especially for the elderly and housebound. The Forum's application for designation (to LB Camden) affirmed a commitment to working with different sections of the community. By the time of this application, the proposed Forum had a membership of over 200 members (which has subsequently increased to 300), including representatives of groups with protected characteristics (e.g. The Somali Youth organisation and Caversham Elder People's Organisation).

Consultation events took place at the following stages in the neighbourhood planning process and includes:

- Initial public meeting and consultation at the very start of the process;
- A public meeting to discuss initial approaches;
- The Annual General Meeting and other public meetings;
- Consultation and engagement with Dartmouth Park Neighbourhood Forum and North Camden Town Neighbourhood Forum;
- walkabouts at weekends;
- KTNF stall at Alma Street Fair;
- A three day community planning event organised by KTNF with the Prince's Foundation;
- Street engagement work;
- 'Creative Citizens' - an asset mapping neighbourhood plan workshop
- Consultation on a full draft version of the Neighbourhood Plan (in accordance with the Neighbourhood Planning (General) Regulations).

The Forum has been conscious of the need to engage with hard-to-reach groups. In particular, they have sought to promote the plan to local schoolchildren who have provided their comments online. The Forum has a broad commitment to civic action and local communities being able to shape developments and other projects in the area. The Projects section of the Neighbourhood Plan refers to a pilot project at Eleanor Palmer Primary School, in which two members of the Forum worked with a school teacher to design a lesson on how citizens can make a difference to their local area. A second lesson involved a role play where the children were able to debate the community's priorities playing the part of Councillors. This was tied into some of the

emerging issues being identified through the wider community's participation in the plan making process.

The Forum held several meetings with leaders of the Somali community and a representative of the community acted as an advisor to the Forum during the Plan's preparation. Particular engagement was focussed on the Somali Family and Young People's Centre at Dowdney Close. The Forum left a suggestions box in the Centre which staff took round to local Somali groups. The Forum includes representation from the Lesbian Gay Bisexual and Transgender community.

The following views were fed back to the Forum by pupils at Eleanor Palmer Primary School:

- Improve the public realm around the school on Lupton Street.
- Young people enjoy using the 'home zone', e.g. football
- Opportunity to plant more trees and plants
- Possibility of improving the appearance of the Falkland Road play space to make it more attractive and inviting
- Ugly shopfronts - better design and colour needed - some look tacky
- Concerns about whether new homes are affordable for ordinary people

The Forum has not identified any specific barriers they have faced in securing the participation of groups with protected characteristics.

The Forum is preparing a Consultation Statement setting out the full details relating to community engagement. This will form part of the Plan's submission to LB Camden.

Have you identified any information gaps?

The Neighbourhood Forum has undertaken an extensive range of community engagement using a variety of methods to encourage participation by all sections of the community.

They have specifically considered how to promote participation from individuals and groups which tend to be less engaged with, or aware of, local planning issues. The overall level of community engagement is considerable and perhaps reflects the challenges faced by the Forum, representing all the relevant interests of a fairly diverse neighbourhood, broadly reflecting the Borough's mix and diversity as a whole.

It is considered that the Forum has used some innovative forms of engagement which it is considered helped bring the plan's attention to groups with protected characteristics, e.g. schoolchildren. The programme of community engagement is considered to be proportionate having regard to the nature of the area and scope of the Neighbourhood Plan's policies.

Stage three - analysing your equality information and assessing the impact

This section of the EIA should be completed when you are reviewing this activity and considering different options for future delivery.

Analysing the evidence outlined above, could the activity have a negative or positive impact on protected groups?

This part of the assessment outlines the policies contained within the KTNP and the impact their delivery is likely to have upon protected groups. All policies are considered to have some impact ranging in scale on the protected groups.

Policies impacting upon protected groups:

It is considered that all groups will benefit in some way from the policies below. Particular affects relating to individual protected groups are identified and discussed.

Policy SW1: Supporting small business

The policy seeks to provide support for small businesses by increasing the level of floorspace suitable for use by Small and Medium Enterprises (SMEs). This will increase the range of premises available in Kentish Town, particularly for start-ups. The Neighbourhood Plan notes there has been a loss of 130 small business premises and offices in Kentish Town since the Government introduced a permitted development right allowing a change of use from office to residential without the need for planning permission over a limited period. Camden Council has noted that this has resulted in already occupied premises being lost from employment use leading to their tenants being displaced. 'Non-prime' / small office premises, which applies to much of the stock in Kentish Town, and which tends to be suitable for SMEs and start-ups, is particularly at risk from conversion. The Neighbourhood Plan policy by seeking to mitigate the impact of these losses in the local area will boost local economic output and create new jobs. The demographics of the area and nature of SMEs suggests the policy will benefit young entrepreneurs and investors. Stage 2 of the EIA demonstrates there is a higher disproportionate numbers of residents in Kentish Town within these age categories. There is also likely to be a benefit for niche firms supplying products and services to individual groups and communities which may otherwise be unable to afford larger, high specification floorspace.

Policy SW2: Secondary shopping frontages

The aim of the policy is to resist change of use proposals that result in less than 60% of premises being in retail (A1) use in Secondary Shopping Frontages as defined by Camden's Policies Map. It is considered that the impacts identified for the draft Local Plan EIA apply to the Kentish Town context. Camden's centres are a focus for activity and community life and provide character and identity to local areas and the Borough as a whole. The policy seeks to protect the vibrancy and vitality of Camden's centres through protecting shops and managing the concentration of food/drink/entertainment premises. The Camden Retail and Town Centre Study notes the importance of increasing the Kentish Town Centre's comparison goods representation and improving the retail and service offer.

Increasing accessibility to shopping will be of particular benefit to less mobile groups such as disabled and older people and people with young children.

Policy SW3: Consecutive secondary shopping frontages

The policy seeks to apply a more restrictive approach to non-retail (A1) uses in secondary shopping frontages than Camden's Local Development Framework by resisting more than two consecutive frontages. The observations above relating to Policy SW2 are considered to apply here.

Policy D1: The View of Parliament Hill

The policy aims to safeguard the quality of the view towards Parliament Hill. This will provide a general benefit to all individuals (including those with protected characteristics).

Policy D2: Railway Lands

This refers to the potential for rafting over the railway tracks from Gospel Oak to Kentish Town Station and from Kentish Town Station to Camden Road. The supporting text refers to possible new residential development in this area and indicates that provision should be made for wheelchair accessible housing. If such development came forward, this would benefit future occupants of this housing.

The policy also promotes improvements to green links in the neighbourhood. Enhancements to open space and green infrastructure links would benefit the whole population but is likely to provide particular benefit for children, young people and older people as these groups are more likely to be present in the area during the daytime and use sustainable modes of travel. Improvements to the public realm would benefit all groups by improving the sense of place and potentially community safety.

Policy D3: Innovative Building Design

The policy refers to various aspects considered by the Forum to be integral to raising design quality. The policy broadly mentions the need for buildings to be designed having regard to the nature of the site and proposed use of the building. This should provide a benefit for individuals and groups with protected characteristics where schemes are designed with the specific needs of user groups in mind. Improvements to the public realm are also likely to benefit older people and people with physical and sensory disabilities where this reduces street clutter and results in a more legible built environment. The policy could be further enhanced by more specific reference to the need to enhance accessibility in buildings by taking into account barriers experienced by different user groups.

Policy D4: Non-designated heritage assets

The policy identifies eight buildings and features which are considered to make a positive contribution to local character and the sense of place. This will complement elements in the historic environment which are included in Camden Council's 'Local List' of non-designated heritage assets.

This is considered to provide benefits for all individuals as the policy will help to ensure that locally valued assets are safeguarded for the enjoyment and use of the local community.

Policy GA: Step-free access In Kentish Town Stations

If this policy can be implemented, it is considered there would be very substantial benefits for groups with protected characteristics. Kentish Town is well-served by public transport (a Thameslink/National Rail station

connecting with Luton Airport, St Albans, London St Pancras, London Blackfriars and stations in the wider SE of England such as Brighton; Kentish Town West Overground station which provides convenient links to a wide range of destinations across London including Highbury and Islington, Willesden, Clapham Junction and Peckham Rye and Kentish Town Underground Station on the Northern Line providing services via Bank and Charing Cross to destinations in north and south London). Despite the very good connectivity of Kentish Town, none of these stations currently offers step-free access. Improvements to address this situation would have a positive impact on disabled users and older people as well as young parents using buggies and pushchairs. The poor standard of access is currently considered to be a barrier limiting the use of stations by these groups and may result in local residents making longer journeys to access step-free facilities outside the neighbourhood area.

Policy GO1: Local Green Spaces

The designation of Local Green Spaces were introduced through the National Planning Policy Framework (NPPF). They are green areas considered to be of particular importance to local communities and should be local in character and in reasonably close proximity to the community they serve. The Neighbourhood Plan has provided justification for each of the local green spaces allocated by the Plan in terms of its community benefit. As these are small spaces they are likely to disproportionately benefit people living in their immediate surroundings. Four of these spaces - Montpellier Gardens, Leighton Crescent Gardens, Falkland Place Open Space and Canteloves Gardens and Skatepark are identified as offering a facility for use by children and young people. It is widely acknowledged that play space for children and young people is important for their social and physical development. The NPPF highlights that Local Green Spaces will enjoy a level of protection consistent with policy for Green Belts. The Forum's identification of these spaces will ensure positive benefits for local residents and visitors.

Policy GO2: Open Spaces on Estates

The policy seeks the protection of existing open spaces on Council and private estates to ensure development would not result in a reduction in the quantity or quality of these spaces. Kentish Town is an area of Camden experiencing deficiencies in open space provision. These will be difficult and expensive to overcome given the already highly developed nature of the area. Large areas of open space on housing estates potentially represent a resource for creating new areas of public open space when an opportunity arises. This may include improved amenity space for passive recreation, areas of natural green space, play facilities or allotments/food growing areas. Open space is considered to be beneficial for all age groups, but provides particular benefit for children and young people. There are also links between open spaces and mental health and well-being. Open space is also a tool for improving social cohesion by providing opportunities for social interaction and can be a focus for community activities and events. Safeguarding and improving open space provision is likely to benefit children and young people, older people and disabled users as well as the wider community subject to the value they place on the individual open spaces.

Policy GO3: Biodiverse habitats

The policy aims to protect and enhance biodiversity habitats and promote an increase in biodiverse habitat. This will benefit all individuals and groups but particularly people wishing to learn about and experience nature at first hand.

Policy CC1: Statement of Community Consultation

The intent behind this policy of increasing local input and engagement in the planning process will provide a general benefit to all groups. This will help to promote greater inclusion above the minimum requirements for

community engagement set out by the NPPF and applied by Camden Council. It will ensure that the community's needs inform the design of a development scheme at an early stage. The policy could be improved through specific reference to setting out how hard to reach groups or groups with protected characteristics have been engaged in the design process. Currently, the supporting text refers to a "broad cross-section of people" which may be open to interpretation.

Policy CC2: Community facilities in schools

The policy seeks to secure community access to school facilities where development schemes are proposed. This will provide a general community benefit but is likely to be particularly beneficial by increasing the range of facilities that can be used by children and young people. This would, in turn, provide benefit for parents/carers. The supporting text specifically refers to enhancing access for children and young people to play space and sports facilities.

Policy CC3: Protection of Public Houses

This policy seeks to identify a number of pubs which are considered by the Forum to provide value to the local community. Public houses are an important focal point for social interaction and may provide community facilities such as meeting rooms capable of being used by a wide range of community organisations. Safeguarding these pubs will help to ensure their community value is not lost. The justification for retaining these pubs also refers to their historic and cultural value as the established presence of a pub can be an important contributor to local character and identity. Where pubs support use by community/voluntary groups, the benefits of retaining the pub potentially extend beyond regular users: this may include the use of facilities by individuals and groups with protected characteristics. Pubs can provide a particular source of support by supporting social networks and reducing isolation.

Policy CC4: Protection of shops outside the Centre

This policy identifies the particular value of various free-standing shops which are considered to be important to the local community. They help meet day-to-day needs and serve parts of Kentish Town where there is limited or no alternative provision within an easy walking distance. As the supporting text acknowledges, retention of these shops is highly desirable as older people, disabled people and those without access to a car will depend on them. Retaining the A1 use is considered by the Forum to provide the most realistic means of ensuring a convenience store continues to operate from these sites.

Spatial Policies

These lie at the heart of the neighbourhood and are considered by the Forum to be of wider than local significance. There are two principal policies.

Policy SP1: Kentish Town Square Phase 1 - CIL Priority (plus Section 106 contributions)

The policy envisages the creation of a Square to act as a focal point for the neighbourhood supported by a range of public realm improvements to enhance connectivity in the neighbourhood and provide a more attractive and accessible approach to the Thameslink and Underground stations. This proposal if implemented could provide benefits for all individuals and groups by improving visual amenity. Where this tackles legibility and safety, there may be particularly benefits for children and young people, women and disabled users. The widening of footways is likely to benefit all users who may feel less safe during peak periods. The greatest benefit is likely to arise for older people and people with disabilities who may not be able to move through the area as quickly and would have more space to do so if the policy is implemented. It is noted this is linked to the delivery of step-free access to the railway stations - the benefits of this proposal are described above.



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Policy SP2: Kentish Town Potential Development Area (KTPDA)

The policy identifies the potential of this strategic area for mixed use development whilst retaining and increasing the scale of industrial and employment opportunities. It encourages housing development within the Regis Road site and the growth of small and start-up businesses.

Policy SP2a - General development criteria

This policy sets out criteria which should inform potential development proposals within the Kentish Town Industry Area. At present, the Plan explains that the design, layout and access of the Industry Area means the local community feel it is detached from its surroundings and could potentially deliver a wider range of benefits for the wider area. Of paramount importance is that industrial floorspace is at least maintained, or increased. This will ensure that there continues to be a wide range of job opportunities in the neighbourhood benefiting young people. The Forum is supportive of a mixed-use approach across the site but this should not adversely affect the views towards Parliament Hill. This provides benefits for all groups and contributes to the sense of well-being by providing a visual relationship with greenspace in a highly built-up area with limited open space provision.

The policy also seeks the provision of housing for the elderly people - this group is more likely than the general population to experience reduced mobility and sensory impairment. Housing can be specifically designed to meet the needs of older people or be capable of adaptation. There may also be a need for specialist forms of older people's housing providing additional care and support. This will help prevent a situation where older people are forced to leave the area to find accommodation which addresses their needs.

Some groups, for example older people and young mothers will benefit from any new health provision which can be delivered within this area. This would also potentially reduce any pressure on existing facilities in the local area.

Community leisure facilities and green spaces would benefit all groups but where this is focussed on play space and active recreation children and young people will be a major beneficiary.

The reference to provision of Blue Badge permit holders supports convenient and accessible parking provision which will potentially benefit disabled people. However, a 'car free' requirement may, as elsewhere in Camden, negatively impact on a small number of older people and young families. This is likely to be mitigated by the very high level of accessibility of the Industry Area ensuring there will be a good standard of access to jobs and services across London. A couple of car club bays are also available in the local area (Falkland Road and Ospringle Road). In addition to Thameslink, London Overground and Underground services, numerous bus routes pass through the Town Centre. There will also continue to be a substantial amount of housing stock providing private car parking as yearly additions to the housing stock amounts to about 1% of the overall supply.

The policy refers to 'three sections' in this area:-

Regis Road - this builds upon the general criteria set out in Policy SP2a. In particular, redevelopment of parts of this site should deliver improved routes through the site and better connections with the surrounding area. As with other public realm improvements envisaged in the Neighbourhood Plan, this would benefit all individuals and groups but particularly older and disabled users because accessibility will be improved. A

higher quality of urban design may also enhance security (and the perception of safety) for other groups including children and young people and women.

The policy seeks to protect the Regis Road Recycling Centre subject to suitable compensatory measures and a delivery office at the Royal Mail site. This recognises facilities which are important in providing vital services for local people and businesses. This will provide a general benefit to all groups but especially for residents employed by these facilities.

There will also be benefits from introducing housing into the area as this will help towards addressing Camden's very high housing need and due to the size of the site, is highly likely to deliver a significant quantity of affordable housing. Importantly the policy notes this is contingent on the compatibility of future residential development with employment uses ensuring the continuing operation of employment uses is not undermined.

Housing and employment opportunities will potentially benefit all groups. By taking a comprehensive approach to the development of this site, the Council will be able to secure the type, size and tenure of housing that addresses (or can be adapted to address) the needs of groups with protected characteristics - e.g. older people and disabled people.

Murphy Site - the Plan confirms what would be the community's aspirations for the site in the event this site comes forward for development in the future or allocated by Camden Council for mixed use development. The Forum expects that any redevelopment should conform to the principles they have set out for the wider Industry Area. There are not considered to be any additional impacts on individuals and groups with protected characteristics beyond what has been assessed for the wider area.

Highgate Road - The policy explains that this area provides valuable employment space for SMEs. Camden Council strongly supports the desire of the local community to see suitable employment space retained where appropriate. Small office space is the most vulnerable to conversion to housing. Space for SMEs is particularly important for young people and entrepreneurs. It may also provide affordable space for businesses providing services either wholly or part for groups with protected characteristics. It is far less likely that such businesses would be located in offices in prime locations, particularly premises with large floor plans.

Site Specific Policies

Car Wash Site, 369-377 Kentish Town Road NW5 2TJ - The policy proposes the redevelopment of the site for a mix of uses. This includes widening the pavement and moving a bus shelter. The changes to the public realm are considered by the Forum to address a public safety concern. The widened pavement would benefit all users but particularly older and disabled people. Users of wheelchairs and mobility aids such as scooters and walking frames can be particularly disadvantaged by narrow pavement widths.

York Mews, Section House and Land around the Police Station - The policy seeks the redevelopment of this site to provide housing and ground floor offices. This would bring into beneficial use underused land. The housing and employment uses could potentially benefit people with protected characteristics. The policy confirms the desire of achieving up to 50% affordable housing in line with Camden's Core Strategy.

Frideswide Place/ Kentish Town Library - this proposes more intense use of this site alongside the retention of Kentish Town Library. A range of uses are identified as being suitable and development and this should be accompanied by measures to enhance the public realm. This policy could potentially benefit people with protected characteristics. Improvements to pavements would particularly benefit older and disabled people. The policy identifies the need to ensure that proposals enhance and do not diminish access to existing facilities used by the community in the vicinity of this site, such as the CoE Primary School and railway station. The policy could benefit less mobile groups by meeting a range of needs in one place.

Wolsey Mews - the policy intends to boost the vitality and viability of the town centre by providing a range of smaller and affordable premises which could be occupied by independents and other service businesses. It also encourages provision of new office space, residential and live/work units. To promote greater footfall and provide an attractive environment for shopping and leisure, measures to improve the public realm are proposed. The policy could potentially benefit the whole community by enlivening this area.

A cycle route and cycle parking would be particularly beneficial for young people as this group tends to be more physically active. If new community facilities are provided these could help provide support and advice for local people. The policy has been drafted to ensure the mix of uses complements rather than competes with the existing centre. People who are less mobile could benefit from a range of needs being met in one place.

Prince of Wales Road NW5 3LQ - this proposes the re-use of this building to provide leisure and entertainment uses. This is justified on the basis that it would not only attract visitors itself but achieve wider regeneration in the town centre from increased footfall. In particular, it would offer a new focus in the southern part of Kentish Town Centre.

A theatre use would provide a cultural use which could help in promoting social inclusion and provide opportunities for social interaction. Subject to any future programme, it could potentially host material to bring wider awareness of issues experienced by groups with protected characteristics, helping to foster greater understanding of the needs of distinct groups. As with other arts venues, there may be potential to provide subsidised entry for some of the community. The size of the facility suggests it may be an appropriate venue for material catering for minority tastes or audiences. Older people may also particularly benefit as this group tends to rely more heavily on local centres.

Future development of Veolia Council depot site - the policy considers the future potential of this large site in the event it is relocated and Camden Council disposes its interest. This could potentially include new employment floorspace, residential uses and community facilities. As with other proposals, the policy identifies the opportunity of achieving an upgraded public realm in the vicinity of the site. Importantly, the policy seeks to safeguard the existing level of employment floorspace. This will ensure that jobs are not displaced or lost as a result of any redevelopment. The policy will potentially benefit all groups but the public realm and recreation proposals will particularly benefit children and young people, older people and people with disabilities.

Small sites and infill development - this seeks to make optimum use of marginal land and other small infill sites. This will potentially improve the character of the street scene and amenity for residents. The policy seeks to ensure that adequate provision is made for private amenity space noting the difficulty of creating new public/private open space due to the size of the sites concerned. Balconies and roof gardens will have particular benefit for people working from home and groups which spend more time at home, e.g. older people and young families.

Equality impact summary

Please use this grid to summarise the impacts outlined above.

| Protected group | Summarise any possible negative impacts that have been identified for each protected group and the impact of this for the development of the activity | Summarise any positive impacts or potential opportunities to advance equality or foster good relations for each protected group |
|-----------------|--|---|
| Age | The introduction of 'car free' development, i.e. within any redevelopment of the Industry Area may have a negative impact on a small number of older people who may be more reliant on a car to get around. This is likely to be mitigated by the very high level of accessibility of Kentish Town to public transport services, particularly if other policies in the Plan deliver higher quality routes to bus stops and enhanced access to railway stations (e.g. creation of Kentish Town 'Square' and step free proposals). | <p>All relevant policies contained within the Neighbourhood Plan are considered to have positive impacts enjoyed by all ages.</p> <p>Transport is a major factor in the quality of life of older people. A number of policies in the Plan aim to improve accessibility and the quality of the public realm. This will potentially make moving around the area easier. The Plan identifies aspects of the local environment which particularly detract from the movement of older (and disabled) people, e.g. the pavement adjoining the Car Wash site and lack of step free access at the 3 railway stations. Older people as a group will benefit as they will be more likely to be adversely affected by current obstructions to access (Policy D2, GA, SP1-2, Car Wash site, Frideswide Place/Kentish Town Library and Wolsey Mews). For the same reason policies to protect and enhance public and private open space will also benefit this group (Policies GO1-3).</p> <p>Policy seeking to enhance the range of shopping, community and cultural services and safeguard convenience stores will benefit those older people who have a greater reliance on provision within an easy walking distance from home. In addition there will be a positive benefits in protecting public houses have a beneficial</p> |

| | | |
|--------------------------------|---|--|
| | | <p>community role by supporting social networks and providing space for meetings and events (Policies SW2, SW3, CC4, Frideswide Place/Kentish Town Library, Wolsey Mews, Prince of Wales Mews).</p> <p>Children and young people generally spend more time close to home. As with older residents they will benefit from policies seeking to enhance the public realm and open space. Young people may also benefit from improvements to the Centre, including improved recreational opportunities (e.g. the theatre proposal)</p> <p>Younger age groups are likely to be key beneficiaries of proposals to provide new leisure facilities as part of the redevelopment of the Industry Area (SP2) and enhance shared access to school facilities (CC2).</p> |
| Disability | The Neighbourhood Plan is not expected to have a negative impact in relation to this protected group. | It is considered that policies seeking to improve the public realm and provide step free access to the railway stations will have a positive impact on the quality of life of disabled people. In addition, policy SP2 specifically recognises the need for Blue Badge holders to be considered if redevelopment schemes come forward in the Industry Area. |
| Gender reassignment | The Neighbourhood Plan is not expected to have a negative impact in relation to this protected group. | The Neighbourhood Plan aims for overall improvements to the neighbourhood area from which all people should benefit regardless of their current or previous gender. |
| Marriage and civil partnership | The Neighbourhood Plan is not expected to have a negative impact in relation to this protected group. | The Neighbourhood Plan aims for overall improvements to the neighbourhood area from which all people should benefit regardless of their current or previous gender. |

| | | |
|-------------------------|---|---|
| Pregnancy and maternity | The Neighbourhood Plan is not expected to have a negative impact in relation to this protected group. | <p>Improvements to the quality of the public realm, particularly where this would reduce street clutter and improve step-free provision would be beneficial for pregnant women and parents carrying or pushing their children in a pram or buggy. Use of the public realm and open spaces would also be enhanced if these measures improve public safety and surveillance (or reduce the fear of crime). Improved access to community facilities, e.g. greater shared use would benefit parents by promoting increased provision close to home. It is noted that the Spatial Policies for the Industry Area seek to ensure there is adequate provision of social infrastructure to support new development.</p> |
| Race | The Neighbourhood Plan is not expected to have any negative impact in relation to this protected group. | <p>The Neighbourhood Plan aims for overall improvements in the neighbourhood area from which people should benefit regardless of their race. The following site allocations and spatial policies potentially could accommodate space for a range of new community facilities: Policy SSP2, SSP5, SSP6, SSP7 and SSP8.</p> |
| Religion or belief | The Neighbourhood Plan is not expected to have any negative impact in relation to this protected group. | <p>The Neighbourhood Plan aims for overall improvements in the neighbourhood area from which people should benefit regardless of their religion or belief. The following site allocations and spatial policies potentially could accommodate space for new community facilities: Policy SSP2, SSP5, SSP6, SSP7 and SSP8.</p> |
| Sex | The Neighbourhood Plan is not expected to have a negative impact in relation to this protected group. | The Neighbourhood Plan aims for overall improvements to the Neighbourhood Area from which all people should benefit regardless of gender. The improvements to the public realm and open spaces will help address the fear of crime (most |

| | | |
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| | | commonly expressed by women) and being a victim of crime within the public realm (most commonly men). |
| Sexual orientation | The Neighbourhood Plan is not expected to have a negative impact in relation to this protected group. | The Neighbourhood Plan aims for overall improvements to the neighbourhood area from which all people should benefit regardless of their sexual orientation. Safer public spaces and retention and enhancement of community facilities may disproportionately benefit LGBT communities, particularly where this results in the increased availability of facilities for hire. |

Stage four - planning for improvement

This section of the form should be completed when you are developing plans for the future delivery of the activity.

The actions identified below can also be included in your service plan to help mainstreaming and for performance management purposes. They should also be included in any decision making reports relating to the activity you are analysing. You may find it helpful to document the actions in an [action plan](#).

What actions have been identified:

- to mitigate against or minimise any negative impacts?
- to advance equality, and therefore improve the activity?

- Policy D3 could be further enhanced by more specific reference to the need to enhance accessibility in buildings by taking into account barriers experienced by different user groups.
- Policies GO1 and GO2 could include more explicit reference to enhancing these spaces, as well as protecting them. This could potentially involve measures which improve the access and use of the spaces by individuals and groups with protected characteristics.
- Policy CC1 could be improved by including specific reference to how hard to reach groups or groups with protected characteristics will be engaged in the design process. The supporting text refers to a "broad cross-section of people" which may be open to interpretation.

Stage five - outcome of the EIA

Use this stage to record the outcome of the EIA. An EIA has four possible outcomes.

| Outcome of analysis | Description | Select as applicable |
|---|---|----------------------|
| Continue the activity | The EIA shows no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken | |
| Change the activity | The EIA identified the need to make changes to the activity to ensure it does not discriminate and/ or that all appropriate opportunities to advance equality and /or foster good relations have been taken. These changes are included in the planning for improvement section of this form. | Y |
| Justify and continue the activity without changes | The EIA has identified discrimination and / or missed opportunities to advance equality and / or foster good relations but it is still reasonable to continue the activity. Outline the reasons for this and the information used to reach this decision in the box below. | |
| Stop the activity | The EIA shows unlawful discrimination. | |

Reasons for continuing with an activity when negative impacts or missed opportunities to advance equality have been identified.

Stage six - review, sign off and publication

Review

Your EIA will have helped you to anticipate and address the activity's likely effect on different protected groups. However the actual effect will only be known once it is introduced. You may find you need to revise the activity if negative effects do occur. Equality analysis is an ongoing process that does not end once an activity has been agreed or implemented.

Please state here when the activity will be reviewed, and how this will be done, for example through the service planning process, when the service is next procured etc. This will help you to determine whether or not it is having its intended effects. You do not necessarily need to repeat the equality analysis, but you should review the findings of the EIA, consider the mitigating steps and identify additional actions if necessary.

For restructures or organisational change a review should take place once the restructure has been completed. In addition to the areas identified above your review should include an evaluation of how the staff profile after the organisational change compares to Camden's profile, the division profile and the staff profile prior to the change. Your HR change adviser will provide you with the necessary data.

Date when EIA will be reviewed: potentially following issue of Examiner's report to test impact of any recommended modifications to the Neighbourhood Plan.

Sign off

The EIA must be quality assured within the directorate before sign-off by the service head /AD.

| | |
|---|--|
| Quality assured by: | Ruth Craven, Senior Officer, Strategy and Organisation Development and Nicola Tulley, Senior Planner, Strategic Planning and Information |
| Quality assured by OD for organisational change / restructures: | |
| Signed off by: | <i>Frances Wheat</i> (Frances Wheat – Asst Director Regeneration and Planning) |
| Date: | 12 October 2015 |
| Comments (if any) | |

Publication

If the activity will be subject to a Cabinet decision, the EIA must be submitted to committee services along with the relevant Cabinet report. Your EIA should also be published on Camden Data. All EIAs should now be uploaded to the [SharePoint site](#).