



WEST HAMPSTEAD NDF
Neighbourhood Development Forum

Strategic Environmental Assessment (SEA) of the Fortune Green & West Hampstead Neighbourhood Development Plan



Environmental Report
Non-technical Summary
August 2014



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INTRODUCTION

URS is commissioned to undertake Strategic Environmental Assessment (SEA) in support of the emerging Fortune Green and West Hampstead Neighbourhood Development Plan (NDP).

The NDP, once adopted, will present planning policy and guidance for the neighbourhood area. Alongside the London Plan (2011) and the Camden Council Local Plan (in particular, the 'Core Strategy' of 2010), it will provide a framework for determining planning applications.

SEA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SEA of the NDP is a legal requirement.¹

SEA is a process, and the most important step in the process involves publishing a report – known as the Environmental Report – for consultation alongside the Draft Plan.

This is the **non-technical summary** of the Environmental Report being published for consultation alongside the Draft (submission version) West Hampstead and Fortune Green NDP. This summary should be read alongside the main Environmental Report document.

[Structure of the Environmental Report / this non-technical summary](#)

The Environmental Report (and this non-technical summary) sets out to answer four questions:

1. What's the scope of the SEA?
2. What has plan-making / SEA involved up to this point?
3. What are the assessment findings at this current stage?
4. What are the next steps?

WHAT'S THE SCOPE OF THE SEA?

The first step in the SEA process involves establishing the 'scope', i.e. those issues and objectives which should be a focus of the SEA, and those which should not.

Scoping firstly involved identifying a series of broad 'topics'. The decision was taken that the topics should reflect socio-economic as well as environmental considerations.

Next, the following questions were answered for each topic:

- What's the sustainability 'context'?
 - Answering this question primarily involves reviewing Government's National Planning Policy Framework; however, it is also important to 'cast the net wider' and consider contextual messages established through other plans, policies, strategies and initiatives.
- What's the sustainability 'baseline'?
 - Answering this question involves reviewing available data to establish an understanding of the current and likely future state of the environment / socio-economy locally.

Subsequent to the context / baseline review it was possible to identify a concise list of key sustainability issues and objectives that should be a particular focus of SEA, i.e. should be drawn-on as a methodological 'framework' when undertaking assessment work.

At this point, a Scoping Report was published for consultation. Subsequent to the consultation, the scope was finalised and assessment work was able to commence.

¹ SEA is not an automatic requirement for NDPs. Rather, SEA is a requirement where an initial 'screening' assessment identifies the potential for the NDP to result in significant environmental effects. A screening assessment was undertaken for the Fortune Green and West Hampstead NDP by Camden Council in December 2013. The screening assessment identified the potential for significant environmental effects, and hence the NDP is 'screened-in' as requiring SEA.

The SEA Framework

| Topic | Key issues | Key objectives |
|---|---|---|
| Air quality and noise | <p>Air quality in Camden is poor and does not meet the air quality standards for nitrogen dioxide and particulate matter. The whole of Camden has been designated as an Air Quality Management Area.</p> <p>Ambient noise levels associated with traffic flows will be an issue locally</p> | <p>Contribute to an improvement of air quality</p> <p>Ensure that noise from existing and new developments and operations will not affect noise sensitive land uses</p> <p>Ensure new noise sensitive uses are not located near existing established noise generating uses</p> |
| Biodiversity | <p>Sites of particular biodiversity importance are limited locally, but open space and other elements of green infrastructure (e.g. green roofs) can contribute to the 'ecological network' that exists Camden / North London scale.</p> <p>Access to nature is important from a biodiversity conservation perspective, i.e. there is a need to build appreciation of urban biodiversity.</p> | <p>Protect and enhance existing habitats and biodiversity and seek enhancements.</p> <p>Protect and enhance natural habitats in the area, particularly those associated with priority species</p> <p>Deliver targeted habitat creation, including through the provision of open space and green roofs.</p> <p>Protect and provide for the planting of more trees</p> |
| Climate change mitigation (non-transport related) | <p>There is a nationally recognised need to increase the energy efficiency of new and existing buildings and install more renewable energy facilities on new and existing buildings</p> <p>There is a nationally recognised need to encourage the movement of waste up the hierarchy</p> | <p>Promote designs that facilitate efficient use of energy and support the generation and use of renewable and low carbon energy</p> <p>Reduce the amount of waste requiring final disposal, including waste associated with the development process</p> |
| Community and wellbeing | <p>Population growth is a significant issue in West Hampstead and Camden as a whole.</p> <p>There will be a marked increase in the elderly population.</p> <p>Camden's population is highly culturally and ethnically diverse</p> <p>Camden includes areas of relative affluence and deprivation, and this is reflected to some extent in the plan area.</p> <p>Crime consistently appears as a priority issue for residents and businesses</p> <p>There is a deficiency of open space in terms of accessibility of high quality usable open spaces and parks.</p> | <p>Promote healthy living through e.g. provision of walking, cycling and recreation facilities</p> <p>Help reduce levels of crime and fear of crime</p> <p>Ensure access to local shopping, community, and leisure facilities and access to quality open space including children's play space</p> <p>Tackle poverty and social exclusion</p> <p>Encourage development that facilitates social cohesion</p> <p>Encourage development opportunities in those areas in need of economic development</p> <p>Promote access to employment opportunities for local people</p> <p>Protect existing and provide for new education facilities to meet needs</p> |
| Economy | <p>Demand for housing development means that the pool of employment land has been eroded, and this trend is set to continue.</p> <p>Retail centres in West Hampstead remain vibrant.</p> <p>West Hampstead is set to be a future area of growth in the borough. It has been identified as an 'area for intensification' in the London Plan and a 'growth area' in Camden's LDF</p> <p>70% of West Hampstead residents are employed in managerial and professional roles, compared to 63% in Camden. In Fortune Green the percentage is lower, but still above the borough average at 67%. In 2011, 5% (611) of the population of West Hampstead and 6% (592) of the population of Fortune Green were long-term unemployed. This compares to 7% for Camden as a whole.</p> | <p>Support development in existing centres and ensure the health of town centres</p> <p>Encourage the retention and growth of existing, locally based industries and businesses</p> <p>Accommodate new and expanding businesses</p> <p>Encourage new investment in the local economy and promote development opportunities for employment</p> <p>Focus growth on Core Strategy retail growth areas and designated frontages within the retail hierarchy</p> |

| Topic | Key issues | Key objectives |
|--|---|---|
| Heritage | <p>The West End Green Conservation Area falls within the NDP area, and there are numerous listed buildings.</p> <p>There are also many heritage assets in areas adjacent to the NDP area boundary some of which could be affected by development in the area.</p> | <p>Promote high quality and sustainable urban design which protects and enhances the historic environment</p> <p>Ensure enhancement of the public realm and local distinctiveness, taking into consideration the characteristics of the existing townscape and strategic views</p> <p>Ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value</p> |
| Housing | <p>The costs of buying or renting a home on the open market within Camden are amongst the highest in London.</p> <p>23% of Camden residents identify a lack of affordable housing as one of the three issues of most concern to them</p> <p>Rates of affordable housing completion have been well below the rates recommended in the assessment of housing need.</p> | <p>Promote the provision of a range of high quality and affordable housing to meet local needs</p> <p>Increase the net supply of housing, including affordable housing</p> <p>Provide housing for people, particularly families, on low to moderate incomes</p> <p>Encourage development at an appropriate density, standard, size and mix</p> |
| Landscape / townscape | <p>There are no landscapes of national 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.</p> <p>West End Lane forms the spine of the West Hampstead town centre. The area around the stations is viewed by many to be the 'gateway' to the neighbourhood.</p> | <p>Encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair</p> <p>Ensure efficient use of land through maximising densities where appropriate</p> |
| Transport | <p>According to data for the period 2006 to 2013, bicycles increased from 9% to 15% of the proportion of all traffic.</p> <p>The Public Transport Accessibility Levels of the NDP area are very high</p> <p>There are considered to be problems with congestion in some areas.</p> <p>Significant improvements to the interchange area in West Hampstead are currently under way or planned, including a new Thameslink Station and streets upgrades to make pedestrian movement safer, more convenient and more attractive. However, there are still gaps and access to various transport modes is disjointed.</p> | <p>Reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area</p> <p>Encourage development at locations that enable walking, cycling and/or the use of public transport</p> <p>Enhance permeability and encourage the provision of infrastructure for walking, cycling and/or the provision of public transport</p> <p>Encourage an increase in car free and car capped housing</p> <p>Guide significant travel generating developments towards areas with high public transport accessibility</p> <p>Locate significant travel-demand generating uses, including new housing, in areas with high public transport accessibility and local services.</p> |
| Water, flood risk and other climate change adaptation issues | <p>Increases in the amount of built land can cause flooding problems in parts of Camden. The NDP area does not fall within Flood Zones 2, 3a and 3b. However it is within a critical drainage area as identified in the Camden Surface Water Management Plan. Further mapping has shown that areas within the NDP area are at risk.</p> | <p>Protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change</p> <p>Promote the sustainable use of water resources</p> <p>Require development that incorporates sustainable drainage</p> <p>Help to reduce the risk of flooding and increase flood resilience, including surface water flooding</p> |

WHAT HAS PLAN-MAKING / SEA INVOLVED UP TO THIS POINT?

It is a legislative requirement that the Environmental Report includes an explanation of how/why the preferred (i.e. draft plan) approach was selected/developed in-light of earlier assessment of 'reasonable alternatives'. As such, an interim stage of SEA (i.e. a stage prior to assessment of the draft plan / preparation of the Environmental Report) must involve assessment of reasonable alternatives.

Assessment of alternatives for a range of policy issues

The following policy issues were the focus of alternatives assessment:

- Building heights
- Basement development
- Bridges
- Conservation areas
- Views

This list of policy issues was identified by the Neighbourhood Forum drawing on the findings of past consultation. These are all issues that are somewhat contentious locally, i.e. issues for which opposing views exist as to the most appropriate policy approach. Addressing contentious issues systematically, via systematic consideration of alternatives, is a means of ensuring that the final policy approach is sufficiently justified. The main body of the Environmental Report provides further information on the reasons for selecting these issues as necessitating alternatives assessment.

For each of these policy issues, the Environmental Report answers the following questions:

- What are the reasons for selecting the alternatives dealt with?
- What are the assessment findings (in relation to the set of alternatives in question)?
- What are the Forum's reasons for selecting the preferred approach in-light of the assessment?:

With regards to the final question, analysis of the answers shows that the Forum has generally chosen a preferred approach that is entirely 'justified' on the basis of the alternatives assessment. For example:

- For the issue of **Building heights**, in-light of the assessment a preferred approach was developed which specifies for sites outside the Growth Area that there is a need to respect and be sensitive to the height of existing buildings in the vicinity and setting, whilst within the growth area the height of new buildings must have regard to the impact on the setting of the two immediately adjacent conservation areas. This approach resembles 'Option 1' (of the three alternative options assessed), which was found to perform well, with the assessment concluding "*significant positive effects in terms of the economy and employment... [and] notable climate change mitigation benefits given high housing density near to a public transport interchange.*"

There is no instance of a preferred policy approach being developed / selected despite the alternatives assessment indicating the likelihood of significant negative effects. However, it is inevitably the case that in some instances the Forum has chosen a preferred approach that, whilst on balance best-performing, does have drawbacks in terms of particular sustainability considerations. For example:

- For the issue of **Basement development**, the preferred option - A presumption against basement development more than one storey deep or outside the footprint of the property. Development should not cause harm to the natural environment and local amenity; result in flooding; or lead to ground instability – was shown to have merit but be less than ideal in terms of housing and economic objectives. The Forum selected the preferred approach on the basis that: "*There are considerable potential problems with basement developments in the area, particularly around flood-risk. However it is not considered appropriate to ban all basement development - particularly as some basement developments have already taken place in the area. The Neighbourhood Plan seeks to take a balanced approach - highlighting the potential problems of such development, but allowing basement development to take place - albeit with appropriate restrictions in place.*"

WHAT ARE THE ASSESSMENT FINDINGS AT THIS CURRENT STAGE?

Part 3 of the Environmental Report presents an assessment of the Draft (Pre-submission) Plan. The assessment is presented under the ten 'Topic' headings that were used as the basis for scoping, and draws explicitly on the key sustainability issues / objectives identified for each topic. Summary assessment findings are presented below.

Air quality and noise

Development of the preferred allocated sites at the West Hampstead Growth Area will provide for significant measures to provide greater green infrastructure and pedestrian access, given plans for an enhanced transport interchange. The effect should be to reduce traffic locally, possibly with beneficial effects for air quality within the designated as an 'Air Quality Management Area'. The 'significance' of any effects is, however, uncertain.

Biodiversity

The enrichment of biodiversity in the plan area can be delivered through the proposed growth strategy by conserving open green areas, maintaining the natural heritage of the urban environment and by creating green corridors in high quality urban realms in line with green infrastructure linking areas. Landscaping and the planting of trees in new green spaces will have beneficial effects on the built environment, increasing biodiversity within the plan area. Significant effects are, however, unlikely.

Climate change mitigation (non-transport related)

Sustainable design and construction / renewable energy / sustainable waste management is not set to be a major focus of the plan, but it is noted that policy is in place that should have the effect of encouraging scheme promoters to take an ambitious approach to CO2 minimisation within the West Hampstead Growth Area.

Community and wellbeing

The proposed spatial distribution of growth shall deliver significant benefits for the wellbeing of the community, creating a new mixed use area with public and community facilities and services. The effect of the neighbourhood plan will be to ensure a pedestrian friendly urban realm with greater access to public transport to the wider area. Employment sites are to be protected in existing commercial areas, with potential for considerable investment in additional floorspace at the West Hampstead Growth Area. Allocated sites within the growth area are to provide for a substantial amount of affordable housing. These policy measures have **significant positive effects** in terms of promoting a healthy community locally.

Economy

The increase in additional commercial floorspace in the West Hampstead Growth Area will accommodate new and expanding businesses, thus helping to ensure that the local and wider economy continues to thrive. The Neighbourhood Plan will help to ensure that existing employment and business sites are retained (especially at ground floor level), support flexible space for small independent micro-businesses to prosper in the neighbourhood centres and conservation areas, safeguard shop-fronts and in other ways help to make streets more attractive places for business. Many of the key decisions have been made at a higher level (i.e. through the London Plan, Camden Core Strategy and Camden Site Allocations Plan), but it is clear that the NDP itself will also have a positive effect, i.e. help with the achievement of sustainability objectives.

Heritage

There is an emphasis on ensuring that development within the West Hampstead Growth Area is sensitive to the character of neighbouring conservation areas, although it is recognised that some risks remain that will need to be the focus of ongoing monitoring and evaluation. More broadly, support for sensitively designed residential and commercial development, as well as open space and green space, should help to maintain the 'vitality' of the area and hence support appreciation of local character and heritage. **Significant positive effects** are predicted.

Housing

The proposed growth strategy to provide substantial housing in the plan area delivers a significant quantum of affordable housing, catering for a range of unit sizes and people's needs. Housing is primarily located within the West Hampstead Growth Area, with selected allocations at sites outside this new mixed use area. The distinctive character of the area and proximity to Conservation Areas will encourage an appropriate form, density, and scale of residential growth. The plan is supportive of housing growth and hence should lead to **significant positive effects**.

Landscape / townscape

As allocated spatial growth is largely concentrated towards a new mixed use area on brownfield sites within the West Hampstead Growth Area, the reuse of buildings (vacant or otherwise) to enhance the distinct character of the townscape is encouraged to retain valued community services and employment, retail and business sites in neighbourhood centres. The West Hampstead growth Area is likely to maximise densities creating a vibrant and busy mixed use area with respect to the urban character of the immediate area. **Significant positive effects** are predicted, given that the baseline situation would likely involve a more ad hoc approach to growth.

Transport

The proposed spatial strategy will significantly reduce reliance on private transport modes by focusing growth with the West Hampstead interchange area. The plan might be described as infrastructure led, in that it guides growth towards an area of high public transport accessibility. Development of the West Hampstead Growth Area will enhance accessibility to public transport options (overground, underground, bus) while enabling the increased provision of pedestrian and cycling routes through the local area, transport interchange and wider area. Significant positive effects are predicted.

While policies are ambitious in encouraging car free or car capped housing within the Growth Area, there may be opportunities to take a more prescriptive approach. This could help to ensure that issues are addressed fully at the planning application stage. Likewise policy for the improved provision of cycling infrastructure in the area could be more prescriptive and hence help to ensure maximum benefits.

Water, flood risk and other climate change adaptation issues

Although climate change adaptation measures are set to be put in place, including implementation of green corridors and open spaces in the plan area, more proactive approaches to ensuring flood resilience could be taken. Significant effects are unlikely.

Conclusions

The assessment presented above finds that the Plan is likely to lead to significant positive effects in terms of 'Community and wellbeing', 'Heritage', 'Housing', 'Townscape' and 'Sustainable transport'. In terms of a number of other issues/objectives the assessment highlights that the plan is likely to have a positive effect, but that effects will not be 'significant' given that the key decisions have already been made at a higher level, i.e. the Neighbourhood Plan is 'building on an existing policy framework'. No significant negative effects are predicted, although a number of ways in which the plan could potentially 'go further' and hence secure benefits for particular aspects of the sustainability baseline are highlighted.

The benefits relate primarily to the fact that the Plan seeks to ensure a proactive approach to the development of the West Hampstead Growth Area as a local hub, whilst at the same time respecting (i.e. seeking to maintain or enhance) existing valued assets and the character of the local area more generally. The potential for development of the West Hampstead Growth Area to facilitate sustainable travel (i.e. walking, cycling and public transport) is a key issue, and one that is set to be capitalised upon.

Recommendations

No recommendations remain outstanding at the current time. Three recommendations were made within the Environmental Report published alongside the Draft (pre-submission) Plan in May 2014. Two of those recommendations (relating to climate change mitigation and Sustainable Drainage Systems) have now been taken on-board, i.e. are reflected in the Submission Plan.

WHAT ARE THE NEXT STEPS?

Regulation 15, of the Neighbourhood Planning Regulations, requires that the Forum submit (to the Local Authority) the 'Proposed' Plan and a 'Consultation Statement'. The Consultation Statement must describe issues or concerns raised through the Pre-submission Plan / Environmental Report consultation and how these were addressed when preparing the Proposed Plan for submission.

Regulation 16 then requires that the Local Authority 'publicises' the Proposed Plan so that stakeholders can make representations that may then be considered at Examination. It will be appropriate for the Local Authority to also publicise the updated Environmental Report, with a view to informing representations.

Regulation 17 requires that the Local Authority submits (to the person appointed to carry out the Examination) the Proposed Plan and a copy of any representations which have been made in accordance with Regulation 16. It may be appropriate for the Local Authority to also submit the updated Environmental Report, with a view to informing the Examination.

Regulations 18 and 19 require that, subsequent to the Examination, the Local Authority publishes the Examiner's Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to 'make' (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated Environmental Report, with a view to informing the Referendum.

Regulation 20 states what the Local Authority must do when the plan is 'made' (i.e. adopted). The SEA Statement must be published alongside the made Plan. The SEA Statement must present:

- information on the decision, i.e. must explain why the final plan approach was decided-upon in light of SEA and consultation; and
- measures decided concerning monitoring.

Monitoring

In light of the assessment it is suggested that monitoring might focus on **sustainable travel** (to ensure that likely benefits are maximised) and the approach that is taken to the redevelopment of particular key sites / buildings (e.g. to ensure that **heritage** value / the setting of valued heritage assets is not negatively affected).