

Health Impact Assessment of the draft Camden Local Plan

**Camden Council Health and Wellbeing Department and NHS
London Healthy Urban Development Unit**

Introduction

1.1 The Council published the draft new Camden Local Plan in January 2024. The new Camden Local Plan sets out the Council's vision for future development in Camden for the next 15 years and includes the planning policies and site allocations to help achieve this. It is in effect the spatial vision for achieving Camden's corporate strategy, *We Make Camden* and is also closely aligned with the Joint Health and Wellbeing Strategy, with similar ambitions described in both documents.

1.2 The new Camden Local Plan was prepared in discussion with Camden's Health and Wellbeing department and other key stakeholders, to ensure that a 'population health' approach was imbedded in policy and reflected in the proposed strategy.

Purpose of the report

1.3 To assess the health impact of the policies in the new Camden Local Plan a Health Impact Assessment has been undertaken by Camden's Health and Wellbeing Department in partnership with the NHS London Healthy Urban Development Unit.

1.4 Health Impact Assessment (HIA) is a practical approach used to judge the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups. Recommendations are produced for decision-makers and stakeholders, with the aim of maximizing the proposal's positive health effects and minimizing its negative health effects.

1.5 This Health Impact Assessment of the new Camden Local Plan approaches the potential health impact of the new Camden Local Plan through two lenses:

- Its alignment with the direct and indirect aims of improving health and reducing health inequalities described in *We Make Camden* and the Joint Health and Wellbeing Strategy; and
- An assessment those determinants of health which are likely to be influenced by specific development policies within the new Camden Local Plan using the NHS London Healthy Urban Development Unit's Rapid Health Impact Assessment Tool

1.6 The NHS London Healthy Urban Development's Health Impact Assessment Tool helps identify those determinants of health which are likely to be influenced by specific development policies. It does not identify all issues related to health and wellbeing but focuses on the built environment and issues directly or indirectly influenced by planning decisions.

Key findings

1.7 Overall, this HIA finds that the new Camden Local Plan has a positive impact on improving health and reducing inequalities, with some recommendations made to strengthen those impacts.

1.8 These recommendations will be used to inform the proposed submission version of the Camden Local Plan moving forward.

Review of health impacts contributing to We Make Camden and Joint Health and Wellbeing Strategy ambitions

2.1 We Make Camden is the Council’s corporate strategy. It sets out what the Council wants to collectively achieve and lead together with all those who have a stake in the Borough. It was developed following conversations with residents, partners and community leaders.

2.2 The new Local Plan sets out the Council’s vision for future development in Camden for the next 15 years, with planning policies to inform and shape how the borough develops to reflect the six key ambitions set out in We Make Camden, which are closely aligned with the three long-term ambitions of the Joint Health and Wellbeing Strategy 2022-30. A comparison of the ambitions is set out in table 1 below.

Table 1: A comparison of the ambitions set out in We Make Camden and the Joint Health and Wellbeing Strategy 2022-30

We Make Camden ambitions	Joint Health and Wellbeing Strategy long-term ambitions
Camden is a borough where every child has the best start in life.	Start well: All children and young people have the fair chance to succeed, and no one gets left behind.
Camden’s local economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life.	Live well: People live in connected, prosperous and sustainable communities. Age Well: People live healthier and more independent lives, for longer.
Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute.	
Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well.	
Everyone in Camden should have a place they call home.	

Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.	
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2.3 This section of the Health Impact Assessment of the Local Plan examines the Plan in the context of these ambitions.

Camden is a borough where every child has the best start in life

2.4 Giving children the best possible start in life is crucial to their future health and wellbeing – and to reducing inequalities across the life course. Direct contributions include:

- Early Education and Childcare: The plan includes infrastructure provisions for accessible early education and childcare.
- Primary and Secondary School Provision: There is ongoing planning and monitoring to ensure sufficient school places are available, considering demographic changes and housing developments.

2.5 Childcare is an important component of a best start in life. Research shows that high-quality childcare can have long-term benefits for children, including increased cognitive abilities, improved language development and better relationships with peers. Affordable childcare provides the opportunities for parents to work, increasing families' financial resources to support the best start in life.

2.6 The Local Plan seeks to address barriers to work and support health and wellbeing, such as the provision of childcare facilities to support working families. Childcare and education feature prominently on the infrastructure schedule at Appendix 1.

2.7 In addition to direct contributions to supporting Camden as a borough where every child has the best start in life, the Local Plan has a range of indirect contributions that support the We Make Camden ambitions.

Housing

2.8 Housing plays an important role in underpinning a child's best start in life, in addition to being a key factor in helping to

- reduce inequalities
- improve health and wellbeing
- support people to reach their full potential

2.9 Policy H6 addresses the overall need for a mix of housing types, the needs of service families, and the needs of people wishing to build their own homes; Policy

H7 addresses the size of homes (number of bedrooms) needed for large and small families with children, single people, couples and other types of household.

Nutrition

2.10 Children's earliest experiences of food can shape lifelong habits and establish their long-term relationship with food. A lack of sufficient nutrition during critical periods of pregnancy and in early life adversely affect development and increase risk of chronic disease in later life.

2.11 Policy SC4 supports food growing and community food growing in Camden. Whilst it is unlikely that a large proportion of Camden's food is grown locally, this policy is likely to encourage residents to focus on the nutritional value of food and the benefits of eating healthy diets.

2.12 Improving the quality of the food environment around schools has the potential to influence children's behaviour through their food and drink purchasing habits. The Local Plan should be seen in the context of the Council's whole systems approach to improving access to affordable nutritious food and tackling overweight and obesity. For example, whilst policy IE7 seeks to resist new hot food takeaways, particularly in close proximity to schools, the Council is also working to improve school meals and increase the provision of breakfast clubs, deliver the Holidays and Food programme, as well as delivering programmes such as the Families for Life and Family Kitchen family healthy lifestyle and cooking programmes are free universal healthy lifestyle programmes for families with children aged between 2-11yrs old to support them to cook, eat healthily, increase physical activity and make positive behaviour changes.

Physical activity

2.13 Physical development is central to children's health and fitness and provides the foundations for later participation in and enjoyment of physical activity and sport. All children in the early years stage should have safe, stimulating and accessible physical activity - both in safe, comfortable homes and outdoors in play areas, as well as active travel opportunities in their community.

2.14 The explanatory text to policy H7 states that the Council will take account of any features that make the development particularly suitable for families with children, including the potential to provide space on site where children can play (open space or private amenity space) and dedicated children's play space available nearby.

2.15 Examples of policies that encourage physical activity include:

- Policy SC3 gives priority to play facilities and the provision of amenity space which meets residents' needs where a development creates a need for different types of open space; and ensures play facilities and open space support health and well-being and are safe, welcoming, inclusive and accessible for all;
- Policy D3 requires housing developments, where appropriate, to incorporate good quality, accessible play provision for all ages in line with the London Plan policy on play and recreation;

- Policy T1 prioritises walking, wheeling, and cycling encourages physical activity, Encouraging physical activity in childhood is crucial for establishing lifelong habits that promote overall wellbeing.

Air Quality

2.16 Policy A3 (Air Quality), alongside the Council's Clean Air Strategy, Climate Change Action Plan and Transport Strategy, seeks to reduce air pollution. Air pollution particularly impacts children and young people because it can hinder lung growth, inhibit brain development and increase the risk of conditions such as asthma resulting in lifelong health problems.

Camden's local economy should be strong, sustainable and inclusive - everyone should have a secure livelihood to support them to live a prosperous life

2.17 The Local Plan outlines several strategies to ensure that Camden's local economy is strong, sustainable, and inclusive, aiming for all residents to have a secure livelihood and live prosperous lives. Key components include:

- **Maximizing Opportunities for All Residents:** The plan emphasises creating opportunities for Camden residents, businesses, and the voluntary sector to contribute to and share in the borough's economic growth. This involves supporting a range of business activities and ensuring the provision of affordable workspace.
- **Supporting Diverse and Inclusive Employment:** Camden's economy policies aim to address areas of relative disadvantage, particularly income and employment deprivation due to low pay, insecure work, and unemployment. Special attention is given to younger residents, Black, Asian, and Other Ethnic communities, and disabled people who are under-represented in higher-skilled occupations. By tackling these issues, the plan aims to reduce poverty among working people and provide a financial stake in the economy for all residents.
- **Addressing Barriers to Employment:** The plan includes measures to support local business start-ups, entrepreneurs, and residents seeking work. This involves providing access to jobs, skills, education, and training opportunities. Larger schemes are expected to provide a range of unit sizes to increase the supply of space for smaller businesses and entrepreneurs, ensuring that employment spaces are well-laid out and adaptable to changing working practices.
- **Ensuring Equitable Outcomes:** Recognising that the success of Camden's economy is not equally shared, the plan highlights the importance of achieving equitable outcomes for all residents. This includes supporting health and wellbeing by addressing social determinants such as education, employment, housing, and the local environment. Planning policies are designed to improve physical and mental health and well-being, particularly in the most deprived wards.

- **Promoting a Strong and Resilient Economy:** The plan also focuses on maintaining a stock of premises available on a range of terms and conditions to accommodate businesses with differing resources. This includes prioritizing space for key growth sectors, research-based activities, start-ups, smaller businesses, and social enterprises. The aim is to support a strong, diverse, sustainable, and inclusive economy

Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute

2.18 The Draft New Camden Local Plan 2024 addresses injustice and inequality through a comprehensive and strategic vision aimed at creating safe, strong, and open communities where everyone can contribute:

- **Inclusive Communities** - The Draft New Camden Local Plan promotes diverse, safe, and multi-generational neighbourhoods with accessible services for all.
- **Health & Wellbeing** - Health inequalities are tackled by improving housing, transport, green space, and access to services.
- **Equality Focus** - The Plan has undergone an Equalities Impact Assessment to protect vulnerable and underrepresented groups.
- **Local Voices** - Citizen Scientists is a mechanism to involve residents in shaping local development.
- **Regenerating fairly** - The Plan looks to invest in deprived areas (e.g., Camley Street, Agar Grove) to ensure growth benefits everyone.
- **Inclusive Economy** - There are a number of policies that expand access to jobs, training, and support for small/local businesses.

Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well

2.19 The Local Plan includes a number of policies which seek to improve physical and mental health by addressing the social determinants of health through planning and development. Key components include:

- Policy SC1 - Improving Health and Wellbeing: encourages designs that support healthier living and working environments; and promotes physical activity and mental well-being by ensuring developments are safe, accessible, and supportive of healthy lifestyles.
- Policy SC1 also requires Health Impact Assessments for major applications and developments that could potentially cause significant adverse health impacts.

The HIAs should be undertaken early and used to improve the design of developments, maximizing positive impacts and minimizing negative ones.

- Policies D1, D3, H4, and H6 promote affordable, well-designed housing to reduce overcrowding and improve living conditions, crucial for addressing health inequalities.
- Policies CC1 to CC13 address the impact of climate change by promoting development that reduces the risks of extreme weather, which can directly affect health.
- Policies SC2 and SC3 emphasize protecting and enhancing social infrastructure and open spaces, reducing loneliness and enhancing social inclusion, which are important for mental health.
- Policies T1 and T2 promote physical activity through active transport initiatives.
- Policies SC4 and IE7 seek to improve access to healthy food, which further supports a healthy lifestyle.
- Policy IE7: Hot Food Takeaways requires proposals for new hot food takeaways near schools or sensitive areas require an HIA to demonstrate that the development will not negatively impact existing health conditions, such as obesity levels.

Long term changes identified in We Make Camden

Our neighbourhoods support and improve good population health, and our services come together to support wellbeing in our communities.

2.20 The Local Plan integrates health considerations into all aspects of development, aiming to create healthy living environments and reduce health inequalities. Key measures include promoting good quality, affordable housing, and ensuring buildings and places are designed to promote healthy behaviours and inclusivity.

2.21 Population health is an approach that aims to improve physical and mental health outcomes, promote wellbeing and reduce health inequalities across an entire population.

Everyone in Camden eats well every day, with good quality food that is nutritious, affordable and sustainable.

2.22 The Plan supports healthy eating by improving access to healthier food choices and increasing opportunities for food growing. This is addressed through specific policies that encourage the provision of spaces for community gardens and allotments.

2.23 Whilst it is unlikely that a large proportion of Camden's food is grown locally, this policy is likely to encourage residents to focus on the nutritional value of food and the benefits of eating healthy diets.

2.24 Policy IE7 seeks to resist new hot food takeaways, particularly in areas where hot food takeaways are clustered or over-concentrated and near to schools. The local environment has a major influence on our behaviours and streets crowded with fast food outlets can influence our food choices – many of these currently have no or little nutrition information in-store. Children exposed to these outlets, whether out with friends or on their way home from school, may find it more difficult to choose healthier options.

2.25 The planning class use system includes supermarkets and convenience stores within the general class of shops and retail outlets, so the provision of retail food is subject only to market forces. Furthermore, it is not possible for the planning system to distinguish between for example a premium supermarket and a discounter supermarket. As such, it is difficult to use the planning system to tackle issues such as food deserts, i.e. areas where there is no convenient access to affordable nutritious food.

Everyone knows how to take charge of their own health and wellbeing, and be encouraged and supported to keep active, eat well and stay healthy.

2.26 The key to this change is consistently making the healthiest choice the easiest choice. The Local Plan integrates multiple strategies to make the healthiest choices the easiest choices, focusing on health and wellbeing, housing, green spaces, and community facilities.

2.27 Examples of key elements that highlight how the plan enables everyone to know how to take charge of their own health and wellbeing, and be encouraged and supported to keep active, eat well and stay healthy include:

- **Promoting Health and Wellbeing:** Policy SC1: Improving Health and Wellbeing outlines the Council's commitment to improving the physical and mental health of residents. The policy mandates that new developments be designed to promote good health, support active lifestyles, and provide safe and accessible environments. Furthermore, Health Impact Assessments (HIAs) are required for major developments to identify and mitigate potential adverse health impacts early in the planning process.
- **Supporting Active Lifestyles:** The plan emphasises the importance of designing environments that encourage physical activity. This includes creating pedestrian-friendly streets in line with the Mayor's Healthy Streets approach, ensuring access to parks and recreational areas, and providing cycling infrastructure.
- **Enhancing Green Spaces and Biodiversity:** The plan calls for the enhancement of the borough's natural environment through new green infrastructure and improvements to existing spaces. This includes increasing the accessibility of nature reserves and improving biodiversity through sustainable urban drainage systems and roof gardens. Financial contributions from developers are directed towards enhancing open spaces and creating wildlife corridors, which also provide recreational opportunities for residents.

- **Providing Diverse and Inclusive Housing:** Policy H6: Housing Choice and Mix aims to create mixed, inclusive, and sustainable communities by offering a variety of housing types that cater to different needs, including those of families, older people, and disabled individuals. The Council promotes the development of accessible and adaptable housing, ensuring that new homes can meet the changing needs of residents over their lifetimes.
- **Ensuring Accessible Community Facilities:** New community facilities are required to be accessible and provide essential amenities such as public toilets, baby changing facilities, and drinking water. This ensures that all residents, including those with disabilities, can benefit from these facilities. The sustainability of community facilities is also addressed, with the plan requiring assurances that these facilities will remain accessible and affordable for community use in the long term.
- **Addressing Social and Economic Inclusion:** The plan promotes social and economic inclusion by supporting developments that provide affordable housing and community spaces, reducing social polarisation, and fostering multi-generational living.

2.28 In summary, the new Camden Local Plan 2024 seeks to create an environment where the healthiest choices are the easiest choices by promoting health and wellbeing, supporting active lifestyles, enhancing green spaces, providing diverse housing options, ensuring accessible community facilities, and fostering social and economic inclusion. These strategies collectively aim to improve the quality of life for all Camden residents.

Recommendation: Add to Policy SC1 D. “Health Impact Assessments should make clear that the design of the proposed development makes the healthiest choice the easiest choice.”

Everyone in Camden should have a place they call home

2.29 Living in good quality and affordable housing is associated with numerous positive health outcomes for the general population and those from vulnerable groups. The Local Plan outlines several strategies and policies aimed at ensuring "everyone in Camden should have a place they call home." Key contributions include:

- **Maximizing Affordable Housing:** The plan emphasises the importance of maximizing the supply of self-contained and affordable housing. This includes targeting a strategic goal of 3,000 additional affordable homes and ensuring that new developments contribute to this goal.
- **Protecting Existing Affordable Housing:** The plan seeks to protect and improve the existing stock of affordable housing. This involves resisting developments that would result in a net loss of affordable housing and supporting the regeneration of estates to provide better and more affordable homes through the Community Investment Programme (CIP).

- **Community Investment Programme (CIP):** This program focuses on refurbishing parts of Council estates and redeveloping others to ensure that tenants live in good quality accommodation. The CIP aims to deliver 4,850 new homes, including 1,800 new or replacement Council homes and 350 new intermediate homes for rent.
- **Bringing Empty Homes Back into Use:** The plan includes measures to reduce the number of vacant homes. Although they are not planning policy, strategies include issuing Council Tax penalties for long-term vacant homes, taking enforcement action where necessary, and using compulsory purchase orders to acquire and repurpose vacant properties support reductions in empty homes.
- **Ensuring Flexibility and Inclusiveness:** The plan prioritises the delivery of self-contained homes, which can cater to a variety of household types, ensuring flexibility and inclusiveness. This approach supports diverse occupancy and aims to meet the contemporary and future needs of Camden's residents.

2.30 These measures collectively contribute to the overarching ambition that "everyone in Camden should have a place they call home" by increasing the availability of affordable housing, protecting existing housing stock, refurbishing and redeveloping estates, and making efficient use of vacant properties.

Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency

2.31 The Local Plan outlines various strategies and policies to achieve the ambition that "Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency." These contributions include:

- **Zero Carbon Development:** The plan mandates that new developments achieve zero carbon emissions, optimise resource efficiency, and are designed to adapt to and mitigate the effects of climate change. This includes setting high environmental standards for buildings and spaces.
- **Enhancing Green Infrastructure:** Camden's biodiversity strategy, "Creating Space for Nature in Camden," aims to protect and enhance nature and biodiversity. This strategy will be supported by the Local Nature Recovery Network and the Green Infrastructure Strategy, promoting a network of green spaces across the borough.
- **Sustainable Urban Drainage Systems (SuDs):** The plan requires the inclusion of multi-functional SuDs in developments to manage water sustainably and reduce flood risks.
- **Green and Open Spaces:** The plan emphasises the conservation and enhancement of Camden's network of open spaces, including parks, gardens, and green corridors. These spaces are crucial for biodiversity and provide residents with access to nature.

- **Air Quality Improvement:** The plan includes measures to protect air quality, which is essential for creating a healthy and clean environment.
- **Promoting Active Travel:** The plan encourages active travel by improving local connections and infrastructure for walking and cycling. This supports health and reduces reliance on cars, thereby lowering emissions.
- **Community Involvement:** The plan supports community-led initiatives and empowers residents to contribute to tackling the climate emergency through local projects and strategies, such as the Citizen Scientist community research program.
- **High-Quality, Inclusive Design:** New buildings and public spaces are required to be of high design quality, inclusive, accessible, safe, and welcoming. This ensures that developments meet the needs of Camden's diverse population and contribute to the vibrancy and sustainability of the area.

2.32 Through these policies and strategies, the Local Plan aims to make Camden a green, clean, vibrant, accessible, and sustainable place, while empowering everyone to contribute to tackling the climate emergency.

The Camden Joint Health and Wellbeing Strategy 2022 – 2030

2.33 The purpose of Camden's Joint Health and Wellbeing Strategy (JHWS) is to set out the shared principles, long-term ambitions and short-term priorities of the Camden Health and Wellbeing Board for improving health and wellbeing and reducing health inequalities. It is the strategy of the Joint Health and Wellbeing Board, which brings together the Council, NHS and voluntary and community sector to tackle inequalities, support the integration of health and care services, and ultimately improve the health of local people. The Local Plan overlaps with the JHWS on a number of themes and objectives:

- **Health and Wellbeing:** Both documents emphasize improving health and wellbeing, although the JHWS focuses more on direct health outcomes and tackling health inequalities, while the Local Plan incorporates health as part of broader community and environmental planning.
- **Social Determinants of Health:** The JHWS addresses social determinants like poverty, education, and employment directly, while the Local Plan focuses on providing affordable housing, enhancing community facilities, and supporting local economies, which indirectly impact health.
- **Sustainability and Quality of Life:** The Local Plan's commitment to environmental sustainability and creating vibrant communities supports the JHWS goals of promoting healthy environments and lifestyles.
- **Community Engagement:** Both strategies highlight the importance of involving local communities and stakeholders in planning and decision-making processes to ensure that policies meet the needs of Camden's residents.

2.34 In summary, while the Camden Joint Health and Wellbeing Strategy 2022-2030 focuses specifically on health outcomes and reducing health inequalities, the Local

Plan takes a broader approach to improving quality of life through sustainable development, housing, and economic growth. In doing so, the Local Plan sets the policy framework and conditions to support the objectives of the Joint Health and Wellbeing Strategy.

Health Impact Assessment of the new Camden Local Plan 2024 using the NHS London Healthy Urban Development Unit matrix

3.1 This Health Impact Assessment of the Camden Local Plan assesses the plan in the context of those wider determinants, using a framework described in the London Healthy Urban Development Unit's "Rapid Health Impact Assessment Tool". The assessment tool takes an evidence-based approach to integrating health into urban planning, and takes into account legislation and policy changes both nationally and in London that relate to health and spatial planning.

3.2 The Rapid Health Impact Assessment Tool identifies eleven broad determinants that can be influenced by spatial planning:

- Housing quality and design
- Access to healthcare services and other social infrastructure
- Access to open space and nature
- Air quality, noise and neighbourhood amenity
- Accessibility and active travel
- Crime reduction and community safety
- Access to healthy food
- Access to work and training
- Social cohesion and lifetime neighbourhoods
- Minimising the use of resources
- Climate change

3.3 The initial scoping stage (see Appendix 1) analyses which policies described in the Camden Local Plan have the greatest direct impact on health and require further analysis. It is recognised that most if not all policies may have some impact on health.

3.4 Those policies were then assessed against the determinants in the HUDU Rapid Health Impact Assessment Tool taking into account evidence and best practice from elsewhere. A gap analysis was also undertaken ensure that the Local Plan addresses all of the determinants.

3.5 An analysis has not been undertaken for chapters 3, 4, 5 and 6 of the Local Plan as these chapters detail the site allocations and there is a requirement for a separate HIA for each of the sites as they come forward for development in policy SC1.

Policy	Analysis
Housing quality and design	
Policy D1 Achieving Design Excellence	The policy aims for design excellence to respond to climate change and improve health and wellbeing. The policy aims for flexibility in building design which will help to achieve lifetime homes and ensure that new buildings are adaptable.
Policy D3 Design of Housing	<p>The policy refers to the residential design standards contained within the London Plan and the Major's Guidance which is considered to allow for sufficient analysis of schemes to achieve an acceptable standard of amenity.</p> <p>By endorsing London Plan design and space standards the policy would help reduce the likelihood of overcrowding for families. Overcrowded conditions in childhood are associated with increased risk of respiratory illness and meningitis and damp and mould. Comfortable living conditions contribute to residents' mental wellbeing.</p> <p>The policy aims for 90% of new homes to be in accordance with Building Regulation M4 (2) and 10% to be in accordance with M4 (3). It is recognised that this is a minimum standard which complies with building regulations</p>
Policy H1 Maximising Housing Supply	<p>The policy sets out sets out how the Council aims to deliver it's housing targets. Housing availability directly impacts on health. Having enough housing to meet demands will assist in ensuring that more people can remain in the area and will add to social cohesion and prevent issues from overcrowded accommodation other benefits to health. This is key to ensuring that everyone in Camden should have a comfortable place to live and that Camden has enough decent, safe, warm, and family-friendly housing to support our communities.</p> <p>The policy acknowledges that the size, tenure, and location of housing are important, and this is covered in more detail in other policies in this section of the Local Plan.</p>
Policy H2 Maximising the supply of self- contained housing from mixed use scheme	<p>This policy promotes the inclusion of permanent self-contained homes as part of mixed-use development schemes. It applies in the defined South Camden sub-area and the town centres of Camden Town and Finchley Road / Swiss Cottage.</p> <p>This policy would help to create mixed used communities which can encourage integration and prevent issues such as loneliness and difficulty accessing services which can lead to poor health. The policy also allows the provision for off-site contributions which would assist in improving housing stock elsewhere in the borough which would also contribute positively to health.</p>

Policy	Analysis
<p>Policy H3 Protecting Existing Homes</p>	<p>The policy aims to resist the net loss of all residential floorspace, therefore preventing developers from profiting from the demolition of old stock to provide new stock where the old stock remains fit for purpose.</p> <p>This will assist in meeting housing targets as the aim is ultimately to provide more homes overall which would contribute positively to health</p> <p>The policy seeks to strike a balance between conversions of existing housing stock and losing larger units while providing more protection for provision of family homes. This could contribute positively to appropriate housing availability but could also reduce existing housing stock for large families who require houses of more than three bedrooms.</p> <p>There is also some concern that this encourages the splitting of dwellings to units which, although may meet the London Plan space standards have an awkward layout with limited liveability and of poor quality and also homes which are not adaptable as people age which could be detrimental to the amenity of future occupiers.</p>
<p>Policy H4 Maximising the supply of affordable homes</p>	<p>The policy aims to aims to support the target for 50% genuinely affordable homes which exceeds the London Plan target of 35% and therefore will encourage more inclusive environments and allow more people to remain and live in Camden which will positively contributed to health and wellbeing.</p> <p>Good quality, affordable housing can have positive impacts and is an important determinant of health. On-site affordable housing could increase diversity of the community and improve perceptions of safety, particularly amongst low-income groups.</p>
<p>Policy H5 Protecting and improving affordable housing.</p>	<p>The policy aims to improve and increase the existing stock of affordable housing.</p>

Policy	Analysis
Policy H6 Housing Choice and Mix	<p>The policy aims to avoid social polarisation to create mixed, inclusive sustainable homes which in turn could help to prevent loneliness and have a positive impact on health and wellbeing.</p> <p>Neighbourhoods which are mixed and inclusive can contribute to social cohesion and reduce isolation and loneliness, including for older people.</p> <p>However, there could be more emphasis on creating mixed used developments and integrating different housing types, tenures and sizes.</p>
Policy H7 Large and Small Homes	<p>The policy aims to secure a different size of homes to contribute to the creation of mixed, inclusive and sustainable communities. As above this could help to prevent loneliness and have a positive impact on health and wellbeing.</p>
Policy H8 Housing for older people, homeless people and other people with care or support requirements	<p>The policy aims to assist older people, homeless people and other people with care or support requirements to live as independently as possible. Provision of homes for people in need will meet their basic health and wellbeing needs and improve health generally.</p> <p>The policy encourages adaptations to allow people with support requirements to live independently and remain in their own home where possible. It recognises the varied and in depth needs of a number of sub-groups and details their individual requirements for instance autism and dementia. This is deemed to be a positive in terms of health as ensuring a mix of types of location for different housing types helps provide choice in addressing housing needs and maintaining independence which promotes good mental health and wellbeing.</p>
Policy H9 Purpose Bult Student Accommodation	<p>The policy aims to ensure that there is a supply of student housing to meet the needs of the student population. The provision for affordable student housing will enable students from less well-off backgrounds to have the same opportunities as others. In addition, the provision for the amenity standards to comply with relevant standards for HMOs will ensure that students will have sufficient space and living standards.</p> <p>The GLA recently consulted on a Guidance document for Purpose Built Student Accommodation which is likely to have progressed or be adopted by the time of the Local Plan publication. The Council should take into account this guidance when finalising the policy.</p>

Policy	Analysis
Policy H10 Housing with shared facilities.	The policy aims to ensure that there is a continued provision of housing with shared facilities to meet the needs of small households on limited incomes and that such housing has a suitable standard of amenity for residents. Although it is recognised that self contained dwellings would provide the best level of amenity in most cases this policy supporting the provision of this cheaper accommodation can enable the less well-off to remain in Camden. This therefore increases the mix of dwellings and allows individuals on a low income to remain in the borough which would assist with avoiding social inclusion. However, poorly maintained HMOs can result in poor mental and physical health of the occupiers.
Policy H11 Accommodation for Travellers	The policy aims to secure a sufficient supply of pitches/plots to meet the existing and future needs of Camden's established traveller community. Gypsies and Travellers have some of the poorest health outcomes and are identified as a vulnerable population in England. The provision of permanent pitches should have a positive impact on the general health and wellbeing of the gypsy and traveller community in Camden by ensuring greater access to essential services and facilities, such as education.
Policy CC1 Responding to the Climate Emergency	The policy aims to respond to the climate emergency and supports the retrofitting of existing buildings to make them more energy efficient and also aims to minimise the risk of overheating by design. This could also improve health by providing comfortable living conditions and reducing incidences of damp in mould in the housing stock. Tackling overheating and other climate related issues by design with an emphasis on mitigation/adaptation through good design also reduces the costs to individuals by reducing the need for mechanised ventilation systems.
Policy A1 Protecting Amenity	<p>The policy aims to protect the quality of life and amenity of existing and future occupiers and is supported by Camden's Planning guidance on amenity.</p> <p>Amenity issues such as privacy, outlook and levels of daylight can have a significant impact on quality of life and unneighbourly developments can lead to significant stress which can impact on wellbeing and mental health. The inclusion of this policy therefore supports the development management team in their assessment of amenity on a case-by-case basis.</p>

Policy	Analysis
Policy A4 Noise and Vibration	<p>The policy aims to ensure that noise and vibration is controlled and managed to avoid significant adverse impacts on health and quality of life.</p> <p>The policy restricts development close to sensitive uses where it will generate significant noise. Appendix 3 contains noise thresholds which assists in giving developers measurable targets.</p> <p>Noise and vibration can have significant impacts on health by restricting sleep and causing distress and disturbance.</p>
Access to healthcare services and other social infrastructure	
Policy SC1 Improving Health and Wellbeing	<p>The policy aims to improve physical and mental health and wellbeing of all people and support healthier communities and reduce health inequalities. The use of Health Impact Assessments for major developments is encouraged as this will assist in identifying the unique health issues of an area and whether there is currently sufficient infrastructure in the area. Although the policy states that a HIA should be undertaken at an early stage and the policy states that HIAs should accompany a planning application it is considered that a HIA should inform the design and layout of new buildings and therefore the policy could be strengthened by highlighting this.</p>

Policy	Analysis
<p>Policy SC2 Social and Community Infrastructure</p>	<p>The policy aims to support social and community infrastructure and to ensure that it is developed and modernised to meet needs. The policy seeks contributions when there would be additional demand as a result of a development and the time frame in which they can be delivered.</p> <p>Provision of suitable education establishments can have an overall positive impact on health and wellbeing through creating opportunities to improve education and gain better employment.</p> <p>It is understood that it is the aim to update the Infrastructure Delivery Plan which should inform the Local Plan into the next stages and that consultation with the NHS and other infrastructure providers continues to ensure that their requirements are met.</p> <p>The policy also states that the Council will aim to maximise the opportunities for shared use and co-location of facilities.</p> <p>Appendix 1 contains an Infrastructure schedule to support the policy. This should be regularly updated in consultation with key infrastructure providers taking account of the most up to date information.</p> <p>The policy supporting text also makes reference to making provision for public toilets in line with the London Plan policies. This policy could be strengthened by also providing water fountains as requirement Provision of public toilets and fountains will encourage more vulnerable residents including older people to interact with public realm. It also contributes to good hygiene and cleanliness and makes sure there is access to clean water in public areas.</p> <p>Cross-referencing to other design and development policies in the plan e.g. active transport policies could contribute to ensuring the community buildings are as health promoting as possible</p>

Policy	Analysis
Policy SC3 Open Space	<p>The policy aims to protect, enhance and improve access to public open space to promote health and wellbeing, which would have a positive impact by increasing activity and therefore decreasing the likelihood of cardiovascular diseases and other long term health issues. There is evidence that the mental and physical health benefits of amenity space and landscaping varies with the quality of these spaces.</p> <p>It is welcomed that there is a requirement to provide 9sqm of public open space per occupier for major residential and student accommodation schemes which would add significantly to the availability of such space.</p>
Policy SC4 Food Growing	<p>The policy aims to support food growing and community food growing in Camden to ensure that residents have access to nutritious, affordable and sustainable food. As well as the health benefits from access to food there is the added benefit of the creation of an increased community involvement.</p> <p>It is welcomed that there is provision for approximately 0.9sqm of space for food growing per person or a financial contribution.</p> <p>However, where delivered on site this should be inclusive and accessible so it can be used by all members of the community to avoid social exclusion.</p>
Access to open space and nature	
Policy NE1 The Natural Environment	<p>The policy aims to protect and enhance the network of open spaces and local green spaces across the borough which would have a positive impact on health as it would encourage more active lifestyles and access to fresh air. The policy does seek to improve opportunities for residents and the public to access and engage with nature, particularly in areas where such opportunities are lacking and therefore would have a positive impact in reducing health inequalities.</p>
Policy NE2 Biodiversity	<p>The policy seeks to ensure that development protects and enhances nature conservation and biodiversity in the borough which would also contribute to access to open space and natural spaces and promote active, healthy lifestyles.</p>

Policy	Analysis
Policy NE3 Tree Planting and Protection	<p>The policy seeks to protect existing trees and secure additional tree planting in the borough which would also contribute to access to open space and natural spaces and promote active, healthy lifestyles.</p> <p>There is evidence that the density of tree cover affects mental health. Greater density yields greater health benefits. This policy seeks to retain existing trees of value wherever possible. Mature trees have greater biodiversity benefits than new saplings and should be afforded greater protection.</p>
Policy SC3 Open Space	<p>The policy aims to protect, enhance and improve access to Camden's high-quality public open spaces to promote health and wellbeing. The policy gives some protection to open space from development; however, it also allows some development where deemed appropriate and places an emphasis on the desirability of providing open space within development sites. The policy highlights the needs for welcoming, accessible, inclusive open spaces.</p>
Policy DS1 Delivering Healthy and Sustainable Development.	<p>The policy aims to provide new open space and opportunities for play recreation and sports which would contribute childhood development and assist in tackling key health issues such as obesity in children.</p>
Accessibility and active travel	
Policy T1 Safe Healthy and Sustainable Transport	<p>The policy prioritises the delivery of safe, active, healthy, affordable and sustainable transport in line with the Council's Transport Strategy. The policy prioritises sustainable means of active transport which could have a positive benefit on people's health and wellbeing as well as benefits for the climate and for reducing air pollution.</p> <p>There is also an emphasis on making streets more attractive for pedestrians and cyclists. Reducing the use of motor vehicles will also improve on air quality which will have a positive impact on health.</p> <p>This could potentially result in more compact and complete neighbourhoods, which are associated with increased physical activity and social networking. They are also considered integral to age-friendly community design and are supportive of dementia-friendly communities.</p>

Policy	Analysis
Policy T2 Prioritising walking, wheeling and cycling	<p>The policy promotes active travel by prioritising sustainable methods to improve health and wellbeing, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities. Increasing the attractiveness of active travel will have a positive impact on health. It is noted that the policy also aims for such modes of transport to be inclusive, in particular people with physical disabilities, people using wheelchairs and neurodiverse people.</p> <p>It is welcomed that the Council aims to introduce a road user hierarchy.</p>
Policy T3 Public Transport	<p>The policy aims to safeguard and promote the provision of public transport in the borough. Ensuring that public transport is an attractive transport option will reduce reliance on cars and aid in improving air quality and making the roads less congested and therefore more attractive to active modes of transport</p> <p>Improved access to public transport also would contribute to a reduction in healthy inequalities by improving access to employment, educational opportunities and to other services.</p>
Policy T4 Shared Transport Infrastructure and services	<p>The policy aims to support the delivery of shared transport infrastructure and services in Camden. It is also recognised that modes such as walking and cycling can be combined with public transport which will have an overall positive impact.</p>
Policy T5 Parking and Car Free Development	<p>The policy aims to limit the availability of parking and require all new development in the borough to be car free which would promote active transport and could have a positive impact on health.</p>
Crime reduction and community safety	
Policy A2 Safety and Security	<p>The policy aims to create a safer borough for all. It requires that development should incorporate design, layout and access measures to contribute to community safety and security and recognises that some wards are more sensitive to crime.</p> <p>However, it is suggested that the Council make reference to 'Secured By Design' or another recognised accreditation to measure a developments safety and security. Early consultation with Police Liaison Officers should also be encouraged.</p>
Policy SC5 Cultural Facilities	<p>The policy aims to protect and support the enhancement of cultural facilities. Such cultural places can help to provide a sense of belonging and improve the quality of life of residents.</p>

Policy	Analysis
Policy SC6 Public Houses	The policy aims to protect public houses of community value and those which serve protected groups which will assist in ensuring that venues remain open for the community to have spaces to congregate therefore reducing social isolation and loneliness.
Access to healthy food	
Policy IE7 Hot Food takeaways	<p>The policy aims to minimise harm to health and wellbeing by resisting new hot food takeaways located within 400m of a school.</p> <p>A distance of 400m from the main entrance is deemed to be appropriate to avoid children making unhealthy choices in their lunch hour and therefore have a positive impact on children's health and their nutrition. However, as there is likely to be hot food takeaways on their way home from school, part B of the policy is also considered necessary to prevent children, and adults, from making unhealthy food choices.</p>
Policy IE8 Gambling Uses	<p>The policy resists new gambling uses in town centres.</p> <p>Betting shops and money lenders have negative impacts on health and wellbeing in the community. These shops also tend to cluster in areas with higher deprivation. The policy aims to resist proliferation of these uses. By requiring proposals for all uses in this policy to submit HIAs as part of their proposal (in line with the HIA policy), this will allow a greater understanding of potential health harms and identify strategies to mitigate them.</p>
Policy SC4 Food Growing	The policy aims to support food growing and community food growing in Camden to ensure that residents have access to nutritious, affordable and sustainable food. The incorporation of food growing as part of major schemes is deemed to be a positive in order to provide nutritious food for new residents and promote social cohesion which tackles issues such as loneliness.
Policy IE9 Dark Kitchens	<p>The policy aims to permit proposals for dark kitchens in appropriate areas only. The emphasis is on managing the disturbance that such uses can cause. This would also assist in limiting the supply of unhealthy food choices.</p> <p>Consideration for requiring HIAs for this use as well could also assist in promoting health and wellbeing.</p>

Policy	Analysis
Policy IE6 Supporting town centres and high streets.	The policy aims to support the provision of additional retail floorspace to provide for and maintain a range of shopping opportunities to meet the essential needs of local communities which in turn would ensure that there are a variety of food choices available to residents allowing them to make healthier choices.
Policy IE10 - Markets	<p>The policy aims to promote and protect markets which will improve community access to essential goods and services such as healthy foods and allow start-up businesses opportunities to sell their products.</p> <p>Markets can also promote social cohesion and can contribute to the cultural character of a place so can have a positive impact on mental wellbeing and the creation of a sense of belonging.</p>
Access to work and training	
Policy IE1 Growing a successful and inclusive economy	<p>The policy aims to secure a strong, diverse, sustainable and inclusive economy in Camden and maximise opportunities for the borough's residents, business and voluntary sector to contribute to the economy and therefore would contribute to minimising the rate of unemployment and the associated negative health impacts.</p> <p>Criteria x of the policy states that the policy seeks to address barriers to work and support health and wellbeing such as the provision of childcare facilities to support working families.</p> <p>Criteria xii of the policy requires applications to make a financial contribution towards local skills, training and employments initiatives.</p>
Policy IE4 Affordable and specialist workspace	The policy requires schemes to make contributions towards a mixed and diverse economy that allows a variety of business types and size to access premises suitable for meeting their needs, particularly during the start-up phase.
Minimising the use of resources	
Policy CC3 – Circular economy and reduction of waste	The policy seeks to ensure that developments minimise waste and optimise efficiency by adopting the waste hierarchy (Re-use, re-cycle, Recovery).

Policy	Analysis
Policy CC10 Sustainable design and construction certification.	<p>The policy aims to ensure that all development achieves the highest possible standards of sustainable design and construction using the BREEAM certification method which would incorporate sustainable design and construction techniques.</p> <p>BREEAM has a specific Health and Wellbeing and also addresses Health through multiple categories such as Social and economic wellbeing.</p>
Climate Change / Pollution / Air Quality	
Policy A3 Air Quality	<p>The policy aims to promote development which contributes to air quality and supports the objectives of the Council's Clean Air Strategy to protect Camden's public health. In accordance with the London Plan all development should be at least air quality neutral.</p> <p>The entire of the borough is covered by an AQMA. The policy aims to locate sensitive uses, such as schools and hospitals away from areas of poor air quality. Such areas to avoid are likely to be around the strategic road networks and Air Quality Focus Areas. However, there are no limits or targets which designate an area as having poor air quality and this may likely change over time.</p>
Policy CC1 Responding to the Climate Emergency	<p>The policy sets out how the Council will prioritise the provision of measures to mitigate and adapt to climate change. In particular buildings should be designed to avoid the risk of overheating and avoiding reliance on air conditioning which would have a positive impact on health and would also assist in reducing the risk of fuel poverty.</p> <p>The policy also aims to minimise the risk of flooding by incorporating SuDS to reduce surface water run-off.</p>
Policy CC5 Energy Reduction in existing buildings	<p>The policy supports adaptations and improvements to existing buildings to make them more energy efficient and reduce the energy needed to occupy the building.</p> <p>It requires that for developments of 500sqm or more are required to be fossil fuel free and use low carbon heat and requires an energy statement to demonstrate the proposal meets the requirements.</p>

Policy	Analysis
Policy CC6 Energy Reduction in new buildings	The policy seeks to ensure that all new buildings are designed and built to be net zero carbon in operation and requires that new buildings are fossil fuel free (that is, not connected to the gas grid, use non-combustion energy systems), ultra-low energy, use low carbon heat, and contribute to the generation of renewable energy on-site.
Policy CC8 Overheating and Cooling.	The policy seeks to ensure that development is designed to minimise overheating and promote cooling by supporting proposals which seek to provide good ventilation and address overheating and promote cooling. The application of the London Plan cooling hierarchy is promoted and so is the use of materials and finishes to promote cooling as opposed to active cooling (air conditioning) measures.
Policy CC10 – Sustainable Design and Construction Certification	The policy aims to ensure that all development achieves the highest possible standards of sustainable design and construction using the BREEAM certification method.
Policy CC12 Sustainable drainage	The policy seeks to control surface water run-off from development to reduce the risk of flooding.
Policy NE2 Biodiversity	<p>The policy seeks to ensure that development protects and enhances nature conservation and biodiversity in Camden by safeguarding protected sites and features.</p> <p>In addition, sites are required to achieve biodiversity net-gain of 10% in accordance with national policy.</p> <p>Enhancing biodiversity increases access to green spaces and corridors which in turn can have a positive on physical and mental health.</p>
Policy NE4 Water Quality	The policy aims to ensure that groundwater sources are not polluted during or following a development to protect the water environment and public health.
Monitoring and Delivery	

Policy	Analysis
Policy DM1 Monitoring and Delivery	<p>The policy aims to ensure that the vision, objections and policies of the Local Plan are delivered and states that the implementation of the Local Plan policies will be monitored on a regular basis.</p> <p>The supporting text goes on to state that this will be achieved through the preparation of the Council's Authority Monitoring Report, which is published annually and measures progress with the delivery of the policies in the Local Plan.</p>

Monitoring and Review

4.1 Recommendation: The Council should monitor its Health Impact Assessment policies by recording:

- The number and proportion of major applications that submit a health impact assessment.
- The number and proportion of major applications with the potential to give rise to significant adverse health impacts that submit an HIA. Sensitive uses include education, health, leisure or community facilities, publicly accessible open space, hot food take aways, betting shops and in areas where air pollution and noise issues are particularly prevalent.

4.2 Other recommended indicators are set out by theme in the table below:

Theme	Recommended Indicators
Housing Quality and Design	<p>Life Expectancy</p> <p>Rates of homelessness e.g. no. of people moved from Council's homelessness lists.</p> <p>Recorded cases of dementia</p> <p>Self-reported health Census data</p> <p>Proportion of fully accessible homes (beyond building regulations requirements)</p> <p>Delivery of affordable housing</p>
Access to healthcare services and other social infrastructure	<p>S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services.</p> <p>Percentage of population living within 500m of a GP</p> <p>The number of new publicly accessible toilets and water fountains</p>

Access to Open Space and Nature	Change in areas deficient in open space. Quantity of open space (by type and area) New Recreation and Leisure facilities (sqm).
Accessibility and Active Travel	The number of permissions for car free developments Obesity rates in adults and Children Tfl surveys (use of public transport and active travel)
Crime Reduction and Community Safety	Number of schemes which achieve Secured by Design
Access to Healthy Food	Delivery of food growing spaces/allotments in sqm Planning applications for fast food takeaways and net change Obesity rates in adults and children
Access to Work and Training	Affordable workspace accessible/taken up by local business S106 signed securing local contracts. Net change in industrial/employment floorspace
Minimising the Use of Resources	Achievement of developments with BREEAM 'excellent'.
Climate Change	S106 energy offset payments

Appendix 1

1. Vision and Objectives	Include in HIA
<p>Camden's Vision is: <i>We want to make Camden a better borough — a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone.</i></p> <p>Camden has six ambitions:</p> <ol style="list-style-type: none"> i. Camden is a borough where every child has the best start in life; ii. Camden's local economy should be strong, sustainable and inclusive everyone should have a secure livelihood to support them to live a prosperous life; iii. Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute; iv. Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well and age well; v. Everyone in Camden should have a place they call home; and vi. Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency <p>These ambitions are set out within the Council's corporate strategy and the Local Plan is described in relation to the ambitions in the Sections above.</p> <p>The local plan also has six key missions:</p> <p>Safety: Everyone is safe at home and safe in our communities.</p> <ul style="list-style-type: none"> • Digital: Everyone in Camden can access and be part of a digital society. • Loneliness: No one in Camden is socially isolated without the means to connect to their community. • Housing: Camden has enough decent, safe, warm, and family-friendly housing to support our communities. • Climate emergency: Camden's local economy tackles the climate emergency. 	No
2. Development Strategy	Include in HIA
<p>Policy DS1: Delivering Healthy and Sustainable Development sets out the criteria that the Council will help to support healthy and sustainable places such are reducing carbon emissions, increasing sustainable transport, protecting amenity, providing open/recreational space.</p>	Yes
3. South Camden	
<p>All site allocations will contain separate HIAs with planning applications</p>	
4. Central Camden	

All site allocations will contain separate HIAs with planning applications	
5. West Camden	
All site allocations will contain separate HIAs with planning applications	
6. North Camden	
All site allocations will contain separate HIAs with planning applications	
7. Meeting Housing Needs	Include in HIA
Policy H1 Maximising Housing Supply sets out how the Council aims to deliver it's housing targets.	Yes
Policy H2 Maximising the supply of self-contained housing from mixed use scheme aims to increase housing delivery from mixed use schemes. T	Yes
Policy H3 Protecting Existing Homes aims to resist the net loss of all residential floorspace.	Yes
Policy H4 Maximising the supply of affordable homes aims to support the target for 50% genuinely affordable homes.	Yes
Policy H5 Protecting and improving affordable housing aims to improve and increase the existing stock of affordable housing.	Yes
Policy H6 Housing Choice and Mix aims to avoid social polarisation to create mixed, inclusive sustainable homes.	Yes
Policy H7 Large and Small Homes aims to secure a different size of homes to contribute to the creation of mixed, inclusive and sustainable communities.	Yes
Policy H8 Housing for older people, homeless people and other people with care or support requirements aims to assist older people, homeless people and other people with care or support requirements to live as independently as possible.	Yes
Policy H9 Purpose Bult Student Accommodation aims to ensure that there is a supply of student housing to meet the needs of students.	Yes
Policy H10 Housing with shared facilities aims to ensure that there is a continued provision of housing with shared facilities to meet the needs of small households on limited incomes.	Yes
Policy H11 aims to secure a sufficient supply of pitches/plots to meet the existing and future needs of Camden's established traveller community.	Yes
8. Responding to Climate Change	
Policy CC1 Responding to the Climate Emergency sets how the Council will prioritise the provision of measures to mitigate and adapt to climate	Yes

change. In particular buildings should be designed to avoid the risk of overheating and avoiding reliance on air conditioning.	
Policy CC2 Repurposing, Refurbishment and Re-use of Existing Buildings seeks to ensure that demolition of buildings is only undertaken when it is the only feasible option.	No
Policy CC4 Minimising Carbon Emissions seeks to ensure that all development minimise carbon emissions.	Yes
Policy CC5 Energy Reduction in existing buildings supports adaptations and improvements to existing buildings to make them more energy efficient and reduce the energy needed to occupy the building.	Yes
Policy CC6 Energy Reduction in new buildings seeks to ensure that all new buildings are designed and built to be net zero carbon in operation.	Yes
Policy CC7 Heat Networks seeks to ensure that all major developments utilise energy from heat networks where feasible.	No
Policy CC8 Overheating and Cooling seeks to ensure that development is designed to minimise overheating and promote cooling.	Yes
Policy CC9 Water Efficiency aims to maximise water efficiency.	No
Policy CC10 – Sustainable Design and Construction Certification aims to ensure that all development achieves the highest possible standards of sustainable design and construction using the BREEAM certification method.	Yes
Policy CC11 Flood risk seeks to ensure that development addresses and reduces flood risk to mitigate the impact of flooding on Camden’s communities both now and in the future.	No
Policy CC12 Sustainable drainage seeks to control surface water run-off from development to reduce the risk of flooding.	Yes
9. Delivering an Inclusive Economy	
Policy IE1 Growing a successful and inclusive economy aims to secure a strong, diverse, sustainable and inclusive economy in Camden.	Yes
Policy IE2 Offices aims to manage and protect the stock of offices in the borough to ensure that suitable and viable accommodation is retained.	No
Policy IE3 Industry aims to manage and protect the supply of industrial and warehousing land, recognising its value for a variety of business types.	No
Policy IE4 Affordable and specialist workspace requires schemes to make contributions towards a mixed and diverse economy that allows a variety of business types and size to access premises suitable for meeting their needs, particularly during the start-up phase.	Yes

Policy IE5 Hotels and Visitor Accommodation recognises the importance of the visitor economy in Camden and will therefore support proposals involving additional hotel and visitor accommodation.	No
Policy IE6 aims to promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors.	Yes
Policy IE7 aims to minimise harm to health and wellbeing by resisting new hot food takeaways located within 400m of a school.	Yes
Policy IE8 Gambling uses aims to resist new gambling related uses.	Yes
Policy IE9 aims to permit proposals for dark kitchens in appropriate areas only.	Yes
Policy IE10 Markets aims to promote and protect markets.	Yes
10. Supporting Camden's Communities	
Policy SC1 aims to improve physical and mental health and wellbeing of all people and support healthier communities and reduce health inequalities.	Yes
Policy SC2 aims to support social and community infrastructure is developed and modernised.	Yes
Policy SC3 Open Space aims to protect, enhance and improve access to public open space to promote health and `wellbeing.	Yes
Policy SC5 aims to protect and support eh enhancement of cultural facilities and manage the impact of adjoining uses.	Yes
Policy SC6 Public Houses seeks to porrect public houses which are of community, heritage or townscape value.	Yes
11. The Natural Environment	
Policy NE1 aims to conserve and enhance Camden's natural environment.	Yes
Policy NE2 Biodiversity aims to ensure that development protects and enhances nature conservation and biodiversity in the borough.	Yes
Policy NE3 Tree Planting and Protection seeks to protect existing trees and secure additional tree planning in the borough.	Yes
Policy NE4 seeks to ensure that development avoids the pollution of groundwater sources to protect the water environment and public health.	Yes
12. Design and Heritage	
Policy D1 Achieving Design Excellence states that all development in Camden must achieve excellence in architecture and design.	Yes
Policy D2 aims to locate tall buildings in appropriate locations only.	No
Policy D3 Design of Housing aims to ensure that all housing development, is built to create high quality, accessible homes.	Yes

Policy D4 Extensions and Alterations supports applications for extensions and alterations where they are appropriately designed.	No
Policy D5 Heritage aims to preserve and enhance Camden's heritage assets and their settings.	No
Policy D6 Basements aims to only permit basements where they will not cause harm to neighbouring buildings and amenity.	No
Policy D7 Advertisements and Signage requires adverts and signs to preserve character and not impact on public safety or cause light pollution.	No
Policy D8 Shopfronts expects a high standard of design in new shopfronts.	No
13. Protecting Amenity	
Policy A1 seeks to protect the quality of life of future and existing occupiers and neighbours.	Yes
Policy A2 Safety and Security aims to create a safer borough for all	Yes
Policy A3 Air Quality expects development to contribute to improving air quality in Camden to protect public health.	Yes
Policy A4 Noise and Vibration seeks to ensure that noise and vibration is controlled and managed to avoid significant adverse impacts on quality of life.	Yes
14. Safe, Health and Sustainable Transport	
Policy T1 Safe Healthy and Sustainable Transport prioritises the delivery of safe, active, healthy, affordable and sustainable transport in line with the Council's Transport Strategy.	Yes
Policy T2 Prioritising walking, wheeling and cycling promotes active travel by prioritising sustainable methods to improve health and wellbeing, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities.	Yes
Policy T3 Public Transport aims to safeguard and promote the provision of public transport in the borough.	Yes
Policy T4 Shared Transport Infrastructure and services aims to support the delivery of shared transport infrastructure and services in Camden.	Yes
Policy T5 Parking and Car Free Development aims to limit the availability of parking and require all new development in the borough to be car free.	Yes
Policy T6 Sustainable movement of foods, services and materials promotes sustainable movement of goods service and materials.	No
15. Delivery and Monitoring	
Policy DM1 Delivering and Monitoring aims for the Council to deliver the vision, objectives of the Local Plan.	Yes