

Strategic Environmental Assessment (SEA) Screening Opinion

Draft Camley Street Neighbourhood Plan 'Pre-submission' version

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1. Introduction

- 1.1. A neighbourhood plan may require a Strategic Environmental Assessment (SEA) to comply with European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”. The European Directive is transposed into law by the Environmental Assessment of Plans and Programmes Regulations 2004. Under Article 3(3) and 3(4) of the SEA Directive, SEA is required for plans and programmes which “determine the use of small areas at a local level and minor modifications to plans and programmes” where they are determined to be likely to have significant environmental effects.
- 1.2. It is the Council’s responsibility to identify whether an SEA should be undertaken on a neighbourhood plan. This is determined through an SEA screening exercise (see table below).
- 1.3. There is no legal requirement for a neighbourhood plan to have a Sustainability Appraisal (SA), as set out in section 19 of the Planning and Compulsory Purchase Act.
- 1.4. The screening process is based upon consideration of standard criteria in Annex II of the Directive to determine whether the plan is likely to have “significant environmental effects”. The result of the Camden’s screening process is detailed in this screening statement.
- 1.5. A draft of the Camley Street Neighbourhood Development Plan was screened for SEA June 2017 and consulted on with the statutory bodies (Historic England, Natural England and the Environment Agency) for their views. The Council determined that the draft Camley Street Neighbourhood Plan was likely to have significant environmental effects. This related to the draft Plan’s proposal for a restrictive ‘cap’ in the draft Plan on student housing which would potentially act as a blanket ban on this land use for the whole plan period. The SEA raised concerns about the sustainability implications of this policy approach.
- 1.6. A new draft plan has been produced by the Camley Street Neighbourhood Forum dated July 2018 (and subsequently amended) and is subject of this new SEA screening assessment.
- 1.7. The Council has determined that the draft Camley Street Neighbourhood Plan July 2018 is unlikely to have significant environmental effects. The statutory consultation bodies (Historic England, Natural England and the Environment Agency) agree with this determination.

2. Vision, objectives and policy priorities of the plan

2.1. The stated vision of the draft Camley Street Neighbourhood Development Plan is:

“Adjoining the Regents Canal and located between Camden Town and King’s Cross, the Neighbourhood Plan area will transform into a mixed community providing: a range of industrial and commercial space; new dwellings; and new social and community infrastructure. New development over the plan period will satisfy the needs of the current business occupiers, create additional space for new businesses, safeguard existing jobs and creates new ones and provide new homes, with a minimum of 50% affordable housing, plus community facilities and services that will support the existing and new communities. Development will utilise innovative and eco-friendly building design and technology, with green infrastructure integrated throughout.”

2.2. The draft Neighbourhood Plan’s key policy areas are:

- Employment
- Local Community and Social Needs
- Housing
- Sustainable Transport
- Design Quality
- Green Infrastructure

3. Assessment

3.1. The ‘responsible authority’ (London Borough of Camden or another delegated body) must determine whether a plan or programme, in this case the draft Camley Street Neighbourhood Development Plan, is likely to have significant environmental effects with reference to the criteria specified in Schedule 1 of the Regulations.

3.2. These criteria are set out in the table below, along with consideration of the likely impact of the Neighbourhood Plan against each.

SEA Directive criteria	Comments	Likely Significant Effects?
Characteristics of plans and programmes, having regard, in particular to:		
1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard	<p>The Neighbourhood Plan must have regard to National Policy and be in general conformity with the strategic policies of the borough.</p> <p>The draft Neighbourhood Plan, if adopted, would form part of the statutory Development</p>	No

<p>to the location, nature, size and operating conditions or by allocating resources</p>	<p>Plan for the borough and as such contribute to the framework for future projects and activities in the Neighbourhood Area.</p> <p>The Plan does not allocate sites for development or address issues outside of those already assessed in the Council's Local Plan SA (incorporating SEA) and as such is not considered to have significant effects in this regard.</p>	
<p>1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy</p>	<p>The Neighbourhood Plan must be consistent with the National Planning Policy Framework and in general conformity with the Council's strategic policies.</p> <p>The Neighbourhood Plan may form the context for and influence other documents for this area. However, it is considered the extent of impact is unlikely to be significant in this regard.</p>	<p>No</p>
<p>1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development</p>	<p>The Neighbourhood Plan seeks to make a positive contribution to the three dimensions of sustainable development (social, economic and environmental). The Plan's policies have sought to achieve social, economic and environmental gains simultaneously. For example, the redevelopment of commercial sites provides an opportunity to provide more jobs as well as delivering new areas of open space.</p>	<p>No</p>
<p>1d) Environmental problems relevant to the plan or programme</p>	<p>The Neighbourhood Plan identifies the quality of local open spaces as being a particular issue that detracts from the local environment for people living and working in the area. Policies CS GI1 & CS GI2 seek contributions from developments that would lead to additional demand being placed on designated open spaces. The Neighbourhood Plan's emphasis on improving the public realm and connectivity of the area suggests that the Plan's policies will, on implementation, have beneficial effects. The Neighbourhood Plan has appropriately identified, and responded to, known environmental problems in the Plan area.</p>	<p>No</p>

1e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	The neighbourhood plan is not directly relevant to the implementation of community legislation on the environment.	No
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a) The probability, duration, frequency and reversibility of the effects	The policy approaches are not considered to extend significantly beyond the Council's policies which have already tested for SEA.	No
2b) The cumulative nature of the effects	<p>Cumulative effects occur where the outcome of one or more policies, when put together, have a significant combined effect.</p> <p>The draft Plan does not allocate sites for development nor do the policies extend significantly beyond those already tested for SEA in the Council's Development Plan for the borough.</p>	No
2c) The trans-boundary nature of the effects	There are no trans-boundary effects arising from the Neighbourhood Plan.	No
2d) The risks to human health or the environment (e.g. due to accidents)	There are unlikely to be risks to human health or the environment arising from the Plan.	No
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The Plan will apply to new development in the neighbourhood plan area (a part of St Pancras and Somers Town ward). Currently, the area contains a mix of largely light industrial and general industrial uses, as well as housing, focussed on Elm Village, including student accommodation.	No

	The Camley Street Neighbourhood Plan Evidence Base (December 2015) states that the 2011 Census recorded about 500 people working in the neighbourhood area (aged 16-74). The Census also recorded approx. 1,200 people living in the Camley Street area.	
2f) The value and vulnerability of the area likely to be affected due to: i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards or limit values iii) intensive land-use	Local Plan policies relating to design, cultural heritage and environmental protection will apply alongside the Neighbourhood Plan. The draft Neighbourhood Plan has been amended to include the Council's position on tall buildings. The extent of effects are not considered sufficient to warrant SEA.	No
2g) The effects on areas or landscapes which have a recognised national, Community or international protection status	There are no landscapes of national or international protection status in the Plan area.	No

4. Screening outcome

4.1 The screening assessment has identified that the draft Plan is unlikely to give rise to significant environmental effects. The draft neighbourhood plan:

- does not propose sites for development; and
- the policies are not considered to have significant effects that have not already been dealt with in the Council's Sustainability Appraisal (incorporating SEA).

4.2 This determination has also been subject to consultation with the statutory consultation bodies. The consultation bodies, specified in the Environmental Assessment of Plans and Programmes Regulations 2004 that have been consulted are:

- Natural England,
- Historic England,
- Environment Agency.

4.3 The responses from the consultation bodies were received in October - November 2018 and are set out below.

Natural England

On the basis of the material supplied at this time, Natural England concludes that there are unlikely to be significant environmental effects from the proposed plan.

Historic England

Historic England agrees with the Councils SEA screening assessment.

Further comments in respect of the draft Neighbourhood Plan have been provided. These have been shared with the neighbourhood forum.

Environment Agency

Based on the review of environmental constraints, for which the Environmental Agency is a consultee, they note there are no areas of fluvial flood risk, Source Protection Zones for groundwater or main watercourses affected by the neighbourhood plan area. The Environment Agency does not consider there to be any potential significant environmental effects relating to these constraints.

4.4 The result of this screening opinion will be shared with Camley Street Neighbourhood Forum.