

WATERLOO STATION DEVELOPMENT BRIEF

SUSTAINABILITY ASSESSMENT (INCORPORATING SEA) SCOPING REPORT

1.0 Introduction

- 1.1 In June 2008, the Council adopted the Waterloo Area Supplementary Planning Document (SPD) setting out the Council's aspirations for the Waterloo area and the planning framework for achieving change, taking forward the work done by the GLA in the Waterloo Opportunity Area Planning Framework (2007) (OAPF).
- 1.2 The SPD sets out in detail how policies in the UDP apply to Waterloo. It provides guidance on urban design and incorporates a framework on transport, public realm, building height and the location of tall buildings. The SPD encourages regeneration of Waterloo whilst protecting its built heritage and that of its surroundings and enhancing the role of Waterloo as a world-renowned cultural destination.
- 1.3 Consequently, the Waterloo Interchange Development Brief will set out how the Council wishes to deliver a world class transport interchange aimed at increasing capacity to accommodate future increases in total passenger numbers and strengthening the links between Lower Marsh, the Cut and the South Bank.
- 1.4 The Brief will be supplementary to the Council's Unitary Development Plan (2007) and will have regard to emerging policies in the Lambeth Local Development Framework. It will be reviewed as necessary after adoption of the Lambeth Core Strategy. As part of the preparation of the Brief, the Council is required to undertake a process of Sustainability Appraisal (SA). This report describes the results of the SA process and how it has influenced the development options as well as the identification and development of the preferred approach.

2.0 Sustainable Development

- 2.1 Sustainable development is about ensuring a better quality of life for everyone, now and for generations to come. It is about considering the long-term social, economic and environmental issues and impacts in an integrated and balanced way. The UK Government has set five guiding principles to achieve sustainable development. These principles form the basis for policy in the UK and are as follows:
 - Living within environmental limits;
 - Ensuring a strong, healthy and just society;
 - Building a strong, stable and sustainable economy;
 - Promoting good governance; and
 - Using sound science responsibly.

3.0 Statutory Requirements for Sustainability Appraisal and Strategic Environmental Assessment

- 3.1 SA is required in the UK by the Planning and Compulsory Purchase Act 2004. However, the recent Planning Act 2008 has removed the requirement for carrying out SA of SPDs prepared under the Local Development Scheme. As the Council's Core Strategy is currently only in draft form, the Development Brief will be prepared as an SPD under the adopted UDP and therefore, an SA for the Waterloo Station Interchange Development Brief will be required. The SA should also fully incorporate the requirements of the European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive, which was transposed into English Law by the 'Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).
- 3.2 The purpose of an SA is to promote sustainable development through the integration of sustainability considerations into the preparation and adoption of the SPD. The SA considers the Brief's implications from an environmental, social and economic perspective by assessing development options and planning brief guidance against sustainability objectives and available baseline data. It is a process that identifies and reports on the likely significant effects of a plan and the extent to which the implementation of the plan will contribute to achieving sustainable development.
- 3.3 As SPDs are considered to have the potential for causing significant environmental effects, they are required to be screened for SEA to ensure that significant negative environmental effects are minimised and the positive environmental effects are maximised. Environmental Impacts will be considered as part of this SA.

4.0 Habitats Regulations Assessment

- 4.1 The draft Lambeth Core Strategy policies have been screened for their impact on the integrity of European sites as required under Articles 6(3) and 6(4) of the Habitats Directive. The Habitats Regulations Assessment Screening Report (HRA) is presented as a separate document and is available on the Council's website (www.lambeth.gov.uk).
- 4.2 The draft Core Strategy includes site specific policy for Waterloo Station setting out a cluster of tall buildings together with improvements in transport capacity and interchange quality. An HRA was undertaken for the draft Core Strategy and determined that the Waterloo site specific policy positively steers development away from European Sites and associated sensitive areas and that there are no European sites either wholly or partly within Lambeth borough. As this SPD will not contain any new policies or proposals, Natural England has confirmed that an HRA for this SPD is not required.

5.0 Appraisal Methodology

- 5.1 The approach adopted to undertake the SA was based on the process set out in the Office of the Deputy Prime Minister (ODPM) guidance paper 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (November 2005).

5.2 The table below sets out the SA stages and tasks, based on those listed in the Government guidance.

PRE-PRODUCTION
Stage A: Setting the context and objectives, establishing the baseline and deciding the scope
<ul style="list-style-type: none"> ➤ Identify and review other relevant plans, programmes and sustainable development objectives that will affect or influence the SPD/Masterplan. ➤ Collect relevant social, environmental and economic baseline information. ➤ Identify key sustainability issues for the SA to address. ➤ Develop the SA framework, consisting of the sustainability objectives, indicators and targets. ➤ Test the SPD/Masterplan objectives against the sustainability objectives and whether the SPD/Masterplan objectives are consistent with one another. ➤ Produce Scoping Report and carry out necessary consultation with key stakeholders on the scope of the appraisal and the key issues and possible options for solutions.
PRODUCTION
Stage B: Developing and refining options
<ul style="list-style-type: none"> ➤ Carry out appraisal of the SPD/Masterplan options and make recommendations for improvement
Stage C: Appraising the effects of the draft SPD/Masterplan
<ul style="list-style-type: none"> ➤ Predict the effects and carry out detailed assessment of the effects of the draft SPD/Masterplan. ➤ Propose measures to maximise beneficial effects and mitigate adverse effects. ➤ Develop proposals for monitoring. ➤ Prepare the final SA Report along with the draft SPD/Masterplan.
Stage D: Consultation on the SA Report and draft SPD
<ul style="list-style-type: none"> ➤ Consult on the final SA Report along with the draft SPD. ➤ Carry out, where necessary, appraisal of any significant changes made as a result of representations.
ADOPTION AND MONITORING
<ul style="list-style-type: none"> ➤ Inform consultees that SPD has been adopted. ➤ Issue statement summarising information on how the SA results and consultees' opinions were taken into account, reasons for choice of options and proposals for monitoring, including in relation to any recommended changes. ➤ Make SPD/Masterplan and SA Report available for public viewing.
Stage E: Monitoring and implementation of the SPD
<ul style="list-style-type: none"> ➤ Monitor significant effects of the SPD to identify at an early stage any unforeseen adverse effects. ➤ Undertake appropriate remedial action where necessary.

Table 1: SA Stages and Tasks

5.3 SA incorporating SEA was undertaken as part of the preparation of the Council's draft Core Strategy of the Local Development Framework (LDF) and the Waterloo Area SPD. As the SA for each of these documents are directly relevant to the Waterloo Station Interchange SPD and are recent assessments (March and May 2009 respectively), the Scoping Reports for these documents have provided a basis for this SA which will also consider any other additional information specific to the redevelopment of the Station Interchange.

6.0 The Sustainability Appraisal Framework

6.1 Links to other strategies, plans and objectives

6.1.1 As part of the SA Scoping Report for both the Core Strategy and the Waterloo Area SPD, a comprehensive review of policies and programmes was undertaken in order to identify the relevant sustainability objectives and to collect baseline information. The documents reviewed can be viewed at:

<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/Lambeth+Core+Strategy+SustainabilityAppraisalScopingReportRevisedMarch+2009.htm> and

<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/SupplementaryPlanningDocuments%28SPDs%29.htm>.

These documents have been reviewed as part of the scoping exercise for this SPD, to determine whether any other additional documents are relevant. The following additional documents were identified:

Plan/Programme	Objective
CABE/DETR By Design – Urban Design in the Planning System: Towards Better Practice, 2000	Promotes higher standards in urban design for buildings and spaces, landscapes and transport systems.
GLA London View Management Framework – The London Plan SPG, 2007	Provides guidance on the policies in the London Plan for the protection of strategically important views of London and its major landmarks.
GLA London View Management Framework – draft revised SPG, 2009	Provide guidance to London Plan policies which deal with the management of strategically important views.
GLA Waterloo Opportunity Area Planning Framework, 2007	Helps to maximise the development potential of Waterloo with its historic character, environmental, physical and social infrastructure and transport capacity. Influences future public realm, economic development, regeneration and transport programmes. Includes a series of objectives for the area as well as guidance on tall buildings and energy.
London Borough of Lambeth Adopted Waterloo Area SPD, June 2009	Provides a development framework to ensure a comprehensive approach to the regeneration of Waterloo and to co-ordinate public realm and infrastructure improvements. It promotes high density development around the station and a strategy for improving the quality of the environment and local facilities.
London Borough of Lambeth Economic Development Strategy, 2007 - 2010	Identifies the need to increase inward investment, tackling worklessness through partnership working with training and employment partners and supporting local enterprise growth as key to the future prosperity of the Borough.
London Borough of Lambeth State of the Borough Report, 2008	Presents the evidence base which has helped to guide and support the Sustainable Community Strategy. It details Lambeth's features in respect of its people, their social

	conditions and the local economy. It draws on evidence which has been provided by local stakeholders including members of Lambeth First, Lambeth's Local Strategic Partnership.
London Borough of Lambeth Sustainable Community Strategy, 2008 - 2020	It sets out an agreed approach to improving quality of life for the people who live and work in the borough and ensures organisations from the private, public and third sector pool their resources and work together to tackle problems jointly. Based on evidence, it concludes that worklessness should be the key focus.
London Borough of Lambeth Draft Core Strategy: Proposed Submission, 2009	Provides spatial development guidance for the Borough.
London Borough of Lambeth Draft Annual Monitoring Report 2008-2009	Monitors performance and impact of the Council's planning policies and assesses whether the policies are achieving their objectives. It also reviews the Council's progress in preparing Local Development Documents and assesses whether key milestones are being met.
London Borough of Lambeth Annual Air Quality Report and Action Plan Update 2008	Reviews and assesses air quality.

Table 2: Additional Relevant Plans and Programmes

6.2 Establishment of sustainability objectives

6.2.1 The Scoping Report for the draft Core Strategy identified 18 SA objectives used to test the issues and options and the draft Core Strategy policies. The SA objectives identified in the draft Core Strategy SA will be used by Lambeth to appraise all future planning documents produced by the Council. These objectives are more comprehensive than with those identified for the Waterloo Area SPD and will be used to appraise the Waterloo Station Interchange Development Brief.

SA Objective	
Social	
1	Crime and Safety. Ensuring safe communities with reduced crime and disorder.
2	Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.
3	Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.
4	Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.
5	Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.
6	Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and protection of local amenity.
7	Liveability and place. To design and sustain liveable, missed-use physical and

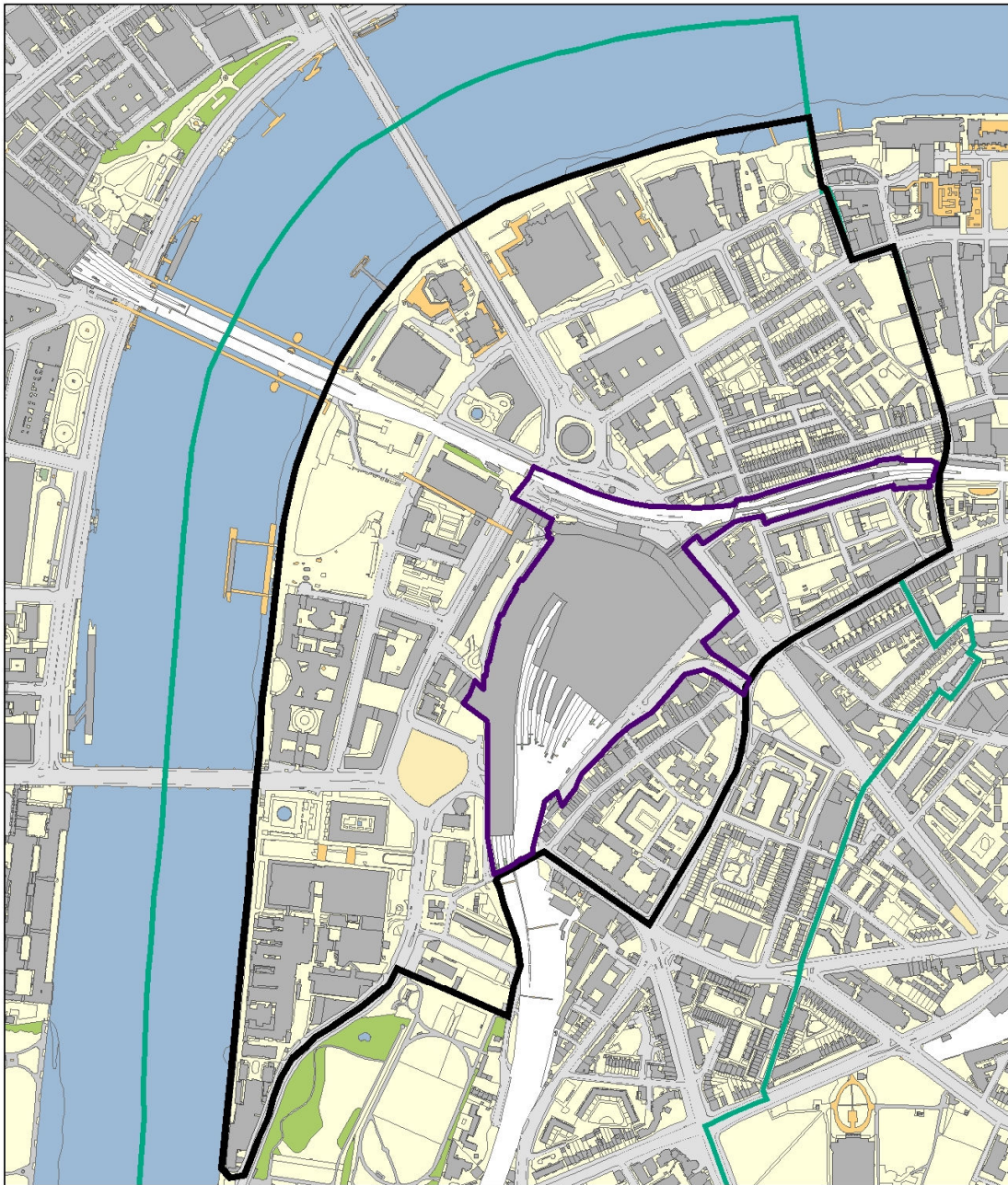
	social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.
Environmental	
8	Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.
9	Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.
10	Biodiversity. To conserve and enhance biodiversity and to bring nature closer to people.
11	Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.
12	Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.
13	Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.
14	Air quality. To improve air quality.
Economic	
15	Education and skills. To maximise the education and skills levels of the population.
16	Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of business.
17	Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land existing buildings.
18	Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.




Table 3: Sustainability Objectives

6.3 Baseline Characteristics

- 6.3.1 Table 4 below provides a summary of the social, economic and environmental characteristics of both Bishops Ward and that for Lambeth/London. The Development Brief Area falls entirely within the Bishops ward (see Figure 1). The baseline data for Lambeth and London has been obtained from the Core Strategy Sustainability Assessment and other sources identified in Table 2. As the Waterloo Interchange Development Brief falls within the Waterloo Area SPD, the baseline characteristics are considered directly applicable. The baseline data for Bishops ward has been obtained from the 2001 census data and the State of the Borough Report (2008) available on the Council's website.

Figure 1: Waterloo Interchange Development Brief Area



-  Waterloo Interchange Brief Area
-  Waterloo Area SPD Boundary
-  Bishops Ward and borough boundary

Topic	Bishops Ward	Lambeth/London
Social		
1. Crime and safety.	There are higher levels of burglary (16.8 per 1,000 population), drug (18.9) and sexual (2.6) offences, theft / handling (176.4) and violence against the person (59.4) than both Lambeth and London averages, due in part to the high number of people visiting the South Bank.	Of all London boroughs, Lambeth had the 4th highest count of Total Notifiable Offences for 2006-2007. However, these have been reducing every year and Lambeth has seen a decrease of over 11,000 offences between 2003/04 and 2006/07. However, at the same time, the sanctioned detection rate has increased by 11% from 2003/04 to 2006/07. High volume crimes are down in 2006/07 by 22% compared to 2003/04 and over this four year period, Lambeth has achieved the second highest rate of crime reduction in London.
2. Health and well being.	16.5% of Bishops Ward residents have a limiting long-term condition.	Lambeth has a smaller proportion of residents with long-term limiting illnesses than is seen across inner-London and England (16% compared with 18% for London and 21% for England). This likely reflects Lambeth's younger age profile and masks the higher than average numbers of residents, particularly from ethnic minority backgrounds, with mental health issues and growing numbers of people with learning difficulties living in the borough.
3. Access and services.	<p>A projected growth of 28% in North Lambeth by 2026 will increase pressure on and access to educational and health services.</p> <p>Additional school places are needed, but these will have to be provided elsewhere in north Lambeth as local school sites are constrained.</p> <p>A new library is needed to replace the temporary building in Lower Marsh.</p> <p>There is a requirement for a new Primary Care Centre in Waterloo to replace the Lower Marsh health Centre.</p>	<p>Demand for primary school place is strong and there are currently very few surplus places. Over the next 10 years, demand for primary places is expected to continue to rise as a result of continuing population growth and housing development, with an estimated additional 5,460 places required by 2020. There is also a historic shortage of secondary school places in the Borough.</p> <p>The configuration of health and social care facilities is undergoing considerable change across London to meet the current and future needs of the growing population. This includes NHS Lambeth's new network for Neighbourhood Resource Centres for primary health care, the planned reconfiguration of King's College Hospital and Guy's and St. Thomas' Hospital NHS Foundation Trust estates, and the establishment of the joint Academic Health Sciences Centre.</p>
4. Provision of essential infrastructure.	<p>As above, healthcare and educational services need to be increased to address shortages.</p> <p>Waterloo has a strong transport network with easy access to good radial and orbital road routes, two mainline train stations, access to four underground lines and a number of bus routes.</p>	Essential infrastructure falls into three broad categories: physical, social and green. Some areas of infrastructure provision are particularly critical over the next 15 years because they are already subject to considerable pressure for resources and/or additional land and facilities are required in order to support population and economic growth. These include public transport, school places, health and social care services, open space, facilities for policing the borough and waste facilities. Decentralised heat, cooling and power systems are also key infrastructure to achieve reductions in energy use and CO ² emissions.
5. Equality and diversity.	White people make up the majority of the population at 70%. Significant ethnic minority groups include Black (17%) and Asian (5%).	According to the 2001 Census, a third (33%) of Lambeth's then population was from ethnic minorities, the seventh highest proportion in the country. Over 68,000 people in Lambeth are classified as Black, with equal proportions of Black Caribbean and Black African (both 11%). The Borough has the second highest proportion of Black Caribbean residents of any UK local authority (after Lewisham) and the fourth highest proportion of Black African people. Around six in ten of

		residents have a white ethnic origin and 10% are from a mix of other ethnic groups, including four per cent who are from Asian backgrounds. The Borough has the largest Portuguese community in Europe outside Portugal.
6. Housing.	<p>At the time of the last Census, there were 9,190 people living in 4,594 households within Bishops ward, resulting in an average household size of two people. Bishops ward also has a high proportion of all-student households. With regards to household tenure, Bishops ward had 48% affordable Council or Housing Association rented, 28% privately rented and 20% owned outright accommodation in 2001. Bishops ward therefore has a higher proportion of affordable housing than the remainder of the Borough.</p> <p>Single adults with no children make up the majority of households in Bishops ward at 50.7%.</p>	<p>One in five residents in Lambeth in 2007 identified affordable housing as a key concern. Although the Council has been successful in delivering several hundred affordable homes in the past few years, high population density and levels of deprivation mean that demand for affordable housing still outstrips supply.</p> <p>Lambeth's housing stock is typical of inner London, with a large proportion of flats, both conversions and purpose-built. 70% of Lambeth is dominated by people living in flats, maisonettes or apartments. 30% is mostly attributed to persons living in a house or bungalow. Lambeth is dominated by single person households at 38%.</p> <p>Perhaps driven by its younger age profile and deprivation levels, Lambeth has a lower rate of home ownership than the rest of London (36% compared to 55% in London and 68% in England) and a relatively high proportion of private and social rented accommodation (22% and 40% respectively).</p>
7. Liveability and place.	<p>One of Waterloo's greatest assets is the South Bank, which is a flourishing global cultural quarter and one of central London's leading business districts. The South Bank area contains excellent visitor facilities, internationally significant centres for the arts and a wide range of bars and restaurants, forming a quality riverfront setting and attracting large numbers of visitors all year round.</p>	<p>Lambeth is an inner London borough with a mix of central London activities in the north and a predominantly sub-urban character in the south of the Borough. It has a distinctive history as a group of Victorian commuter suburbs and is now known as one of the most diverse districts in London. During the post World War II period Lambeth became known as an important focus for the Black Caribbean population; it also has a growing African population and a large Portuguese-speaking population.</p>
Environmental		
8. Built and historic environment.	<p>Bishops Ward has six conservation areas, the character and appearance of which will need to be carefully considered when analysing the development potential of the station. The South Bank is characterised by a nationally important collection of post-war cultural and civic buildings. Waterloo reflects the changing fortunes of the area through the late 18th, 19th and early 20th centuries. Roupell Street consists of early 19th Century formal residential streets and terraced housing. Mitre Road and Ufford Street is characterised by early 20th century philanthropic housing developments. Lower Marsh is lined with mostly 19th Century commercial development and some re-fronted 18th Century buildings. Lambeth Palace is a complex of buildings originating in the medieval period with a Grade II</p>	<p>The Borough contains a diverse and extensive range of building and spaces of historic and architectural interest, both statutorily and non-statutorily protected. Approximately 2,500 buildings in Lambeth are listed. There are 61 conservation areas in Lambeth, most of which are residential in character.</p>

	registered park and garden.	
9. Transport and travel.	Road and rail infrastructure causes severance and as a result the quality of the public realm and the pedestrian experience suffers. However, Waterloo is a significant gateway as a key transport interchange of overground and underground trains, and buses. Sustainable methods of travel therefore dominate people's travel to work choice.	There are 14 overground railway stations spread evenly throughout the borough. There are also eight underground stations mainly in the north of the borough and many bus routes with major interchanges at Waterloo, Vauxhall and Brixton. Public transport links into the capital are good and public transportation is well used and well rated; however some areas of the borough, particularly in the residential south, continue to have poor accessibility. A significant problem in Lambeth, as in much of London, is poor public transport capacity, presenting a barrier to economic growth and regeneration. As a means of transport to work, 63.5% of Lambeth residents use public transport, 21.7% travel by car and 14.9% travel by other means including taxi, bicycle, walking and motorbike.
10. Biodiversity.	Lambeth Palace Grounds and Archbishop's Park make up 4ha of green open space. Other significant open spaces include the Riverside Walk, Jubilee Gardens, Hungerford Car Park, Emma Cons Gardens, Millennium Green and Hatfield's. Lambeth's Biodiversity Action Plan highlights the biodiversity interest of these areas, as well as private gardens, railway lines, houses and churchyards. However, the area south of York Road is an Open Space Deficiency Area. There are limited opportunities to create new public open space in the borough, but two are the creation of the new Waterloo City Square and an extension to Jubilee Gardens.	Lambeth has 64 officially designated parks and greenspaces of 270ha which make up about 9.9% of the Borough. There are 1.5 hectares of unrestricted open space in Lambeth per 1,000 population, although access is unevenly spread and particularly limited in the north of the Borough. In 2008/09 there were no new areas of open space designated. The total area of deficiency in Lambeth is 843.532ha, representing 31.07% of the borough. Many parks and open spaces in Lambeth are also Sites of Importance for Nature Conservation including Streatham Common, Norwood Park, West Norwood Cemetery, Knight's Hill, Brockwell Park, Rush Common, Clapham Common, Ruskin Park, Kennington Park and The Thames. There are no Internationally or Nationally Designated Sites, or Sites of Specific Scientific Interest within Lambeth.
11. Climate change and energy.	No information is available for Bishops Ward.	Energy use in existing homes is the largest single source of CO ₂ emissions in London. London Plan target proposes reduction of CO ₂ emissions by 60% by 2025 against 1990 levels. There has been a steady increase in the installation of renewable generation capacity in London and output of electricity and heat generated by renewables. Total energy consumption in Lambeth equates to 3.2% of the total energy consumption in London and Lambeth ranks 11 th out of the 33 London boroughs. The domestic sector accounts for over half of the consumption in the borough and gas is the primary fuel type (82% of total domestic consumption).
12. Water resources and flood risk management.	All of Bishops ward lies within a high risk area (Flood Zone 3a) prone to once in a hundred year floods from tidal influences from the River Thames. However, the area is protected by flood defences.	80% of London's public water supplies come from the rivers Thames and Lee and there is sufficient water to meet demand during most summers. Groundwater levels are stable. Both North Lambeth and London are vulnerable to flooding from the Thames, it's tributaries, heavy rainstorms and overflowing sewers.
13. Waste.	No information is available for Bishops Ward.	The majority of waste from London is still being landfilled. However, London's present capacity for managing municipal waste within London is small. Lambeth currently generates about 154,000 tonnes of municipal waste each year. In line with targets, 25% of

		household waste was recycled or composted in 2007/08. This has increased steadily from less than 10% in 2001/02. Lambeth was ranked 20 th for household recycling and composting among all London boroughs in 2007/2008.
14. Air quality.	<p>Some of central London's busiest roads run through Waterloo and consequently pollution in parts of the area is very high. The nearest monitoring station to Bishops ward is Vauxhall Cross with a 2008 annual mean of NO₂ at 82ug/m³ is and PM₁₀ of 67ug/m³, significantly exceeding Government targets.</p> <p>The Index of Multiple Deprivation scores a large part of Bishops ward as the 7th worst in the country for living environment deprivation.</p>	Road traffic is the primary cause (90%) of air pollution in Lambeth and in London. The Borough suffers from high levels of PM ₁₀ and NO ₂ with average levels exceeding Government targets of 40ug/m ³ for each. The entire borough is covered by an Air Quality Management Area.
Economic		
15. Education and skills.	Census information demonstrates that Bishops ward has 21% of its population with no qualifications and 39% with a degree or equivalent (NVQ level 4 or 5).	In Lambeth in 2006 the proportion of residents with no qualifications was 21% compared with 14% of people in London as a whole; just over two thirds (68%) are qualified to level 2 or higher. Literacy levels were below national levels and numeracy up to three times below national rates. Nearly a third (31%) of the borough's workless populations have no qualifications; however, three in five of those in paid work have NVQ levels 3 and 4 skills, compared with just a quarter among the workless population.
16. Local economy.	Half of all Lambeth's employment is in the north of the borough particularly around the South Bank. Waterloo hosts a number of headquarters of leading international companies including Shell, IBM and the ITV network. Main sectors of employment include real estate, renting and business activities, followed by health and social work and retail.	<p>There are fewer businesses based in the borough than might be expected given the size of the population and they tend to be small (three-quarters have fewer than 5 employees and 99.65% are Small and Medium Enterprises). The key local employers are in the public sector, health and education sectors.</p> <p>In terms of its relative socio-economic position, Lambeth is the 5th most deprived borough in London and the 19th most deprived in England.</p>
17. Regeneration and efficient use of land.	The area is very densely developed with only a few small undeveloped sites. There are however, several large vacant or underused post war buildings that could be used more efficiently.	Lambeth Council and its partners in Lambeth First are determined to transform the fortunes of the Borough through working together within the coordinated framework established through the Regeneration Delivery Plan and the Economic Development Strategy. Lambeth is densely developed and there is generally a very efficient use of land.
18. Tackling worklessness.	Unemployment levels are lower within Bishops ward than the borough as a whole at 9.5% (State of the Borough Report, June 2008). With an employment rate of 63.7% (State of the Borough Report, June 2008), economic activity is lower within Bishops ward than in the rest of Lambeth partly because the ward has a high proportion of 15-19 year olds and a high number of students.	Lambeth has achieved continuing growth in jobs in recent years, although only 67% were classified as employed in 2006/2007 compared with 69% across London. Lambeth suffers from a high proportion of economically inactive people at 28% compared to 25% for London and an unemployment rate of 10% (State of the Borough Report, June 2008). Among those adults seeking jobs, 60% have no qualifications or only very low level qualifications.

Table 4: Baseline Characteristics

6.4 Key Sustainability Issues

6.4.1 A summary of the key issues for Bishops ward that have arisen from the analysis of the baseline data are provided in the Sustainability Appraisal for the Waterloo Area SPD and are outlined below:

- **Impact on townscape and heritage.** High visibility of new tall buildings will provide an opportunity for landmarks, improved legibility, offices and homes with excellent sustainable transport links, but the impacts on the historic townscape and location, views and local amenity, will need to be managed.
- **Affordable housing.** There is a serious need across London for quality socially affordable housing and housing that is affordable to first time buyers. Development within Waterloo should contribute to the provision of all the housing types that are expected to be needed over the coming years.
- **Public transport capacity.** Transport infrastructure will need to increase above and beyond the level required to support new development. It will need to cater for projected increases in passenger numbers and provide improved standards. Increased rail and bus capacity at Waterloo Station are under consideration and interchange between all modes in and around the station needs to be improved.
- **Connectivity, legibility and public realm.** As part of making Waterloo a more sustainable location for growth, a focused community with a clear centre and a place with a legible and attractive pedestrian environment, major improvements will be needed to the public realm. Connectivity between the South Bank Centre and the Station and beyond to Lower Marsh, as well as uniting Waterloo's varied opportunities and services will need to be facilitated through improvements to streets and spaces.
- **Ensuring adequate quality in green spaces.** Although parks and gardens in the area provide a variety of habitats, new developments should contribute to increasing biodiversity both for ecological reasons, as a recreational resource and as relief from the otherwise hard urban environment. There is very little green space per inhabitant and pressure on the use of existing spaces will increase with higher density development.
- **Energy Consumption.** Energy consumption in London is very high and the city has a huge environmental footprint. Waterloo itself consumes high levels of water, gas and electricity. New development must address issues of fuel shortages and price rises and the need to reduce emissions, pollution and waste.
- **Crime and Fear of Crime.** Crime and fear of crime is a barrier to sustainable communities where people can enjoy a high standard of living and enjoy their homes and localities in safety. Waterloo has higher levels of crime than much of the rest of Lambeth (MET Police) due to the very high number of visitors passing through. New developments should aim to reduce opportunities for crime and antisocial behaviour without moving the problems elsewhere. Failure to do so could have a negative impact on visitor's perceptions of the area as a safe and secure place to visit.
- **Pollution.** The area has high levels of pollution relative to other parts of Lambeth mainly from vehicle emissions. This affects people's health and quality of life, particularly for people living adjacent to major roads. Development at Waterloo should aim to minimise this conflict whilst balancing this with good urban design principles of active frontages and the surveillance of streets and spaces.

6.5 Consultation

6.5.1 In order to meet the Requirements of the SEA Directive, the Planning Authority must seek the views of the following statutory consultees:

- English Heritage
- Environment Agency
- Natural England

6.5.2 The Environmental Assessment of Plans and Programmes Regulations 2004 (Regulation 12(6)) requires the responsible authority to give consultation bodies a period of five weeks to respond from the date it receives the Scoping Report.

6.5.3 The statutory consultees above and the public will also be consulted on the draft SA itself, currently programmed for June 2010. Lambeth will also consult the public on the draft report. This scoping report will be available to the public via the Council's website.

6.5.4 Consultation at this stage seeks to:

- Ensure the SA is comprehensive and robust enough to support the SPD during the later stages of full public consultation.
- Advise on the appropriateness of the sustainability objectives.
- Advise on the appropriateness of the key sustainability issues.
- Advise on the comprehensiveness of the baseline data.

6.5.5 To guide your response please consider the following questions:

1. Do you agree that the draft Sustainability Objectives are appropriate in the context for Bishops Ward and Waterloo station?

2. Are there any additional objectives that, in your opinion, should be included or any that should be removed?

3. Do you consider the indicators and questions proposed are an adequate measure for the proposed objectives? If not what other indicators and / or questions might be more appropriate?

6.5.6 The closing date for responses is Monday 18 January 2010. Please send comments to:

Sri Hall, Senior Planner, Implementation
London Borough of Lambeth
Phoenix House
10 Wandsworth Road
London SW8 2LL

Alternatively responses can be emailed to shall1@lambeth.gov.uk

If you have any queries, please contact Sri Hall on 020 7926 1219.