

**Action 3 – Short note on how spatial alternatives have been considered as part of the Sustainability Appraisal process of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020.**

LB Lambeth - 9 November 2020

This note supplements the information provided in [LBL01](#) (pages 2-5 and Appendix 1), the Council's statement in relation to [Matter 2.2](#), and the Sustainability Appraisal document [PD03b](#).

The overall spatial strategy for Lambeth is set by the Mayor's London Plan, the statutory Spatial Development Strategy for London. The London Plan prescribes the following spatial parameters for Lambeth's Local Plan:

- The Central Activities Zone (CAZ)
- The Central Services Area
- Opportunity Areas at Waterloo and Vauxhall Nine Elms Battersea (also known as Nine Elms Vauxhall) – of which the Vauxhall part is in Lambeth and the remainder in neighbouring Wandsworth;
- The Town Centre Network, which defines a CAZ retail cluster at Waterloo, two Major town centres at Brixton and Streatham and nine District town centres across the rest of the borough. This network includes classifications for night-time economy, commercial growth potential, residential growth potential and office guidelines;
- The Southbank, Bankside and London Bridge arts, culture and entertainment Specialist Cluster (the Southbank is in Lambeth and the remainder in Southwark)
- The Thames Policy Area
- Strategic Areas for Regeneration
- The Brixton Creative Enterprise Zone
- Designation and protection of Locally Significant Industrial Sites (LSIS), which in Lambeth's Plan are known as Key Industrial and Business Areas (KIBAs)
- Safeguarding of existing waste sites;
- Metropolitan Open Land;
- Protection of all open space;
- Identification of air quality focus areas;
- The Transport for London road network and London Distributor Road
- Public Transport Accessibility Levels (PTAL)
- Maximum car parking standards for each PTAL

These strategic spatial parameters underwent sustainability appraisal through the preparation of the London Plan. The Lambeth Local Plan must be in general conformity with the London Plan so cannot deviate from these parameters, although in some cases there is scope to add a Lambeth-specific dimension based on local evidence.

Other spatial parameters are set by national policy, such as the town centre first principle for main town centre uses and the requirement to define primary shopping areas.

Within this context, the scope for the Lambeth Local Plan to consider spatial alternatives is therefore limited to the following main land use matters:

- How and where to plan for housing growth to meet the London Plan housing target (including on small sites)
- Where to support particular types of housing
- Defining the boundary of town centres and primary shopping areas within them
- The mix of uses within the CAZ and town centres
- Defining the boundary of LSIS and how to plan to meet the London Plan requirement to maintain industrial floor-space capacity
- How to meet the London Plan waste apportionment
- Where to manage air quality through planning decisions
- Whether to identify Lambeth-specific car parking standards relating to PTAL based on local evidence; and how to manage roadscape

The current review of the Lambeth Local Plan 2015 is partial, which has implications for the extent of the Sustainability Appraisal undertaken as explained in LBL01. The Sustainability Appraisal of the Draft Revised Lambeth Local Plan appraised 36 sets of reasonable alternatives under the ten broad themes identified at the outset for the partial review. The appraisal of these 36 sets of reasonable alternatives is set out in detail in PD03b. Of these, 16 are considered to have an explicitly spatial dimension as opposed to considering reasonable policy alternatives. These are listed in the table below.

**Table 1 – Reasonable alternatives with a spatial dimension appraised in the SA of the DRLLP**

<b>Key spatial issue</b>	<b>Reasonable alternatives considered and appraised</b>
Managing housing growth	<ol style="list-style-type: none"> <li>1. Releasing a limited amount of industrial land</li> <li>2. Encouraging higher density developments in town centres and in locations with good access to public transport</li> <li>3. No change to current policy position</li> </ol>
Quantity vs Quality of housing	<ol style="list-style-type: none"> <li>1. Relax the requirement for private gardens and balconies in new blocks of flats to enable more housing to be provided</li> <li>2. Support the development of blocks with very small flats/rooms with shared living spaces, much smaller than the current minimum standards for the size of new housing, to increase the number of new, more affordable homes for younger people</li> <li>3. The Council will require minimum external amenity space for all residential units (no change to current position)</li> </ol>
Student housing	<ol style="list-style-type: none"> <li>1. Restrict further student housing in Vauxhall to allow more general needs housing alongside businesses and jobs</li> <li>2. Allow student housing schemes, that accord with applicable policies set out in the development plan, in areas with good public transport access, and easy access to local shops, workplaces, services and community facilities (no change to current position)</li> </ol>
Build to rent	<ol style="list-style-type: none"> <li>1. Support the principle of Build to Rent borough-wide?</li> <li>2. Support Build to Rent schemes only in particular locations or types of sites?</li> </ol>
Family Homes	<ol style="list-style-type: none"> <li>1. Continue to protect family homes from conversions to flats in streets under conversion stress (No change from current position)</li> <li>2. Allow conversion of family homes to flats to increase overall supply of housing in Lambeth</li> </ol>

<b>Key spatial issue</b>	<b>Reasonable alternatives considered and appraised</b>
Gypsy and Traveller Sites	<ol style="list-style-type: none"> <li>1. Meet need for gypsy and traveller accommodation on the existing site in Streatham Vale.</li> <li>2. Not meet future need for gypsy and traveller accommodation in Lambeth.</li> </ol>
Self- and custom-build housing	<ol style="list-style-type: none"> <li>1. Allow the development of sites for self and custom build housing only where this would make efficient use of land.</li> <li>2. Allow lower density development, where this comprises self and custom-build housing, as an exception to usual housing density policies.</li> </ol>
Small business space	<ol style="list-style-type: none"> <li>1. Allow a financial contribution to help provide new small business space elsewhere in the borough, if developers cannot provide new small business space to replace what space is lost when redeveloping a site</li> <li>2. Do not allow a financial contribution from developers in place of providing replacement small business space (No change to current position)</li> </ol>
Key Industrial Business Areas	<ol style="list-style-type: none"> <li>1. Do not amend current KIBA boundaries (No change to current position)</li> <li>2. Amend KIBA boundaries as proposed to allow potential for development involving a mix of small business space and housing in some locations.</li> </ol>
Betting and payday loan shops	<ol style="list-style-type: none"> <li>1. Limit the number of betting shops and pay-day loan shops that can be grouped together in one place</li> <li>2. Do not limit the number of betting shops and pay-day loan shops that can be grouped together in one place</li> </ol>
Nightclubs	<ol style="list-style-type: none"> <li>1. Protect nightclubs from changing to other types of use, where it can be demonstrated that they make a positive contribution to Lambeth's culture and night-time economy and do not adversely affect residents and other businesses.</li> <li>2. Do not protect nightclubs from change of use to other types of use</li> </ol>
Hotels and short-term lets	<ol style="list-style-type: none"> <li>1. Accept that short-term lets, like Airbnb and student housing in vacations, help to meet demand for visitor accommodation in Lambeth alongside hotels - and therefore limit the number of new hotel bedspaces that will be supported.</li> <li>2. Continue to support new hotel developments in appropriate locations across the borough (No change to current policy)</li> <li>3. Do not support any new hotels in the Waterloo area</li> </ol>
Where to require Air Quality Assessments	<ol style="list-style-type: none"> <li>1. Developments that, post-construction, result in a reduction in air quality in the area</li> <li>2. Developments that reduce air quality during construction</li> <li>3. Developments occupied by people who are more sensitive to air pollution</li> <li>4. Developments that take place in areas with poor air quality</li> </ol>
Waste	<ol style="list-style-type: none"> <li>1. Identify specific sites in Lambeth for additional waste management</li> <li>2. Identify broader areas for waste rather than allocating specific sites.</li> <li>3. Allow replacement waste sites to be outside Lambeth, so long as Lambeth would not be penalised against its target.</li> </ol>

Key spatial issue	Reasonable alternatives considered and appraised
Car-free developments	<ol style="list-style-type: none"> <li>1. All new development should be car free except for disabled parking</li> <li>2. New development should be car free except for disabled parking in parts of the borough that are most polluted/congested</li> <li>3. New development should be car free except for disabled parking in parts of the borough that have the highest access to public transport</li> <li>4. Development should be car free particularly in areas where alternative modes of transport are available and where public transport accessibility is high</li> <li>5. No change to current position</li> </ol>
Managing roadspace (some of the alternatives have been taken forward through the Transport Strategy rather than the Local Plan)	<ol style="list-style-type: none"> <li>1. Give more priority to buses across the borough</li> <li>2. Develop measures to reduce overall traffic levels and protect local streets from 'rat running' traffic</li> <li>3. Use parking controls to manage demand for parking, prioritising the needs of residents and protecting essential access.</li> <li>4. Prioritise alternative uses of the kerbside such as car club bays, cycle parking and electric vehicle (EV) charging points, in response to user demand</li> <li>5. No change to current position</li> </ol>