

**Appendix 3 Consultation responses received on Scoping Report 2016**

<b>Statutory consultee</b>	<b>Comment on scoping report</b>	<b>Council response</b>
Environment Agency	The report outlines key sustainability issues, but states that not all issues/policy areas listed are subject to review. It would be helpful if the key issues with each policy review could be provided.	Accepted. The following text has been included: The policy areas that are subject to review include: housing, environment (including waste), neighbourhoods and places, employment land and infrastructure.
Environment Agency	Land contamination should be referred to if considered relevant to the specific policies intended for review as a key issue and a SA objective.	Accepted in part. SA Objective 18 has been amended: 18. 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 and existing buildings, taking into account constraints such as contaminated land.
Environment Agency	SA objective 4 should refer to the flood defences as essential infrastructure	Accepted. Flood defences has been included as an appraisal prompt question/target for SA objective 4
Environment Agency	Appendix 1 review of plans, programmes and policies should be updated to include the following: <ul style="list-style-type: none"> <li>• London Rivers Action Plan 2009</li> <li>• Updated Thames River Basin Management Plan</li> <li>• Flood and Water Management Act 2010</li> <li>• London Borough of Lambeth TE2100 briefing</li> </ul>	Accepted. These have been included in Appendix 1.
Environment Agency	It is important the local plan evidence base is continually updated as new environmental and flood risk data is produced. Land use planning decision should be based on the latest and most accurate climate change data and evidence.	Noted.
Natural England	Recommend there is a separate objective relating to the creation, management and enhancement of green	Accepted.

	infrastructure rather than listing it under objective 10 biodiversity.	A new SA Objective on green infrastructure has been included: 11. Green infrastructure. To create, manage and enhance green infrastructure.
Historic England (received Dec 2017 due to typo in email sent to council)	Table A2: Welcome the incorporation of the recent Good Practice in Planning Advice Notes 1, and 3. It would be suitable to incorporate reference to GPA 2 <i>Managing Significance in Decision-Taking in the Historic Environment</i> . Also, the document 'Conservation Area Designation, Appraisal and Management' has been reissued in February 2016 as part of the review Historic England advice that pre-dated the NPPF.	Noted and accepted – these have been added to table A2.
Historic England (received Dec 2017 due to typo in email sent to council)	Table A3: The Mayor's SPG on World Heritage Sites should be included.	Accepted, this has been added to table A3.
Historic England (received Dec 2017 due to typo in email sent to council)	Pleased to see reference to the Westminster World Heritage Site in the baseline for the historic environment. Unfortunately we have not been able to access Annex 7 and would be pleased to consider this if it can be forwarded. We understand that work is underway on an intervisibility study of building heights in Lambeth addressing the relationship with the World Heritage Site. This is very much supported, and when complete would be an important piece of work to fill a gap in the current baseline information. We look forward to having further details of the progress of this analysis which should greatly assist the consideration of growth in Lambeth. This is particularly relevant in the context of the partial review options for development in the Waterloo area where the Mayor has identified additional growth.	Annex 7 can be found in the Lambeth Local Plan 2015.  Officers are currently working on the intervisibility study of building heights in Lambeth in relation to the World Heritage Site. Anticipated completion is Autumn 2018.

<p>Historic England (received Dec 2017 due to typo in email sent to council)</p>	<p>The reference to the views of St Paul's Cathedral is welcome. Other strategic views are also relevant and we suggest the additional views and vistas relevant to Lambeth in the LVMF should also be referred to.</p>	<p>There are no other views and vistas relevant to Lambeth.</p>
<p>Historic England (received Dec 2017 due to typo in email sent to council)</p>	<p>The baseline should also draw on the local views information that is currently available in the council's local views study and any further views that have been identified since that study.</p>	<p>Accepted. Reference to local views has been made in the Appendix 2 of the Scoping Report - baseline data.</p>
<p>Historic England (received Dec 2017 due to typo in email sent to council)</p>	<p>The council's baseline for the historic environment should include reference to the Lambeth Local Distinctiveness Study.</p>	<p>Accepted in part. This has been added to Appendix 1 – Review of Plans.</p>
<p>Historic England (received Dec 2017 due to typo in email sent to council)</p>	<p>Conservation Area Appraisals and Management Plans are essential sources of information to identify significance and opportunities for managing change. It would be suitable for the baseline to identify the importance of these documents and any pressures or issues that have been identified that have relevance to this review. Are there any gaps in CAA coverage in areas where there is likely to be significant development pressure, and how can this be addressed if so?</p>	<p>Half of Lambeth's 62 Conservation Areas have Character Appraisals in place. None without character appraisals are under significant development pressure. Indeed the general trend in Lambeth's conservation areas is a positive one – the vast majority of conservation areas are well maintained and in a good state of preservation</p>
<p>Historic England (received Dec 2017 due to typo in email sent to council)</p>	<p>The table on page 8 refers to built heritage as a key issue, and it will now be important to identify in the third column what the specific key issues are likely to be in the context of this local plan review. The scope of the FALP IIA is comparatively limited, and so does not assess the built heritage issues that would be appropriate to this level of planning. The key issues should be considered in the context of the likely effects of the additional development being</p>	<p>The quality of the built environment policies are not comprehensively reviewed as part of the Local Plan Review, save for minor tweaks, clarifications and updates. A new policy on basements is proposed though.</p>

	<p>proposed, and not be limited to the heritage policies which, we note, you do not propose to review this time.</p>	
<p>Historic England (received Dec 2017 due to typo in email sent to council)</p>	<p>Within Table 2 we recommend that a more locally responsive framework, appropriate to the the nature of the issues and likely impacts of additional growth in Lambeth's areas of change is included. In order to be able to measure and reflect the impacts, beneficial or harmful, relating to the historic environment we recommend that the prompt question in the second column is disaggregated and adapted as a local plan objective in its own right ie. <i>'Conserve sites, features and areas of historical, archaeological and cultural value/potential and their settings'</i>. For the local plan review, an indicator measuring the number of decisions resulting in harm to, or enhancement of, the significance of the historic environment could be introduced.</p>	<p>Amend the prompt question to SA Objective 8 as follows: Protect, <u>conserve and enhance</u> sites, features and areas of historical, archaeological and cultural value/potential and their settings?</p>