



# Sustainability Appraisal and SEA of London Borough of Lambeth LDF Core Strategy

Issues and Options Assessment  
Briefing Paper

December 2008

December 2008

London Borough of Lambeth Local Development Framework  
Core Strategy  
**Issues and Options Assessment Briefing Paper**

A report by **CAG Consultants and ENVIRON** for London  
Borough of Lambeth

Written by: Emma Jones, Catherine Banks and Niall Machin  
Reviewed by: Johanna Curran

December 2008

CAG CONSULTANTS  
Gordon House  
6 Lissenden Gardens  
London NW5 1LX  
Tel/fax 020 7482 8882  
[hq@cagconsult.co.uk](mailto:hq@cagconsult.co.uk)  
[www.cagconsultants.co.uk](http://www.cagconsultants.co.uk)

ENVIRON UK Ltd  
Swallow Court  
Devonshire Gate, Tiverton  
Devon, EX16 7EJ  
Tel: 01884 842010  
[www.vironcorp.com](http://www.vironcorp.com)



# Contents

<b>1. Introduction</b>	<b>2</b>
<b>Background</b>	<b>2</b>
<b>Purpose of the Sustainability Appraisal</b>	<b>2</b>
<b>This Report</b>	<b>3</b>
<b>The Lambeth Local Development Framework</b>	<b>3</b>
<b>2. Methodology of the Issues Assessment Process</b>	<b>4</b>
<b>Introduction</b>	<b>4</b>
<b>Assessing the Issues and Options</b>	<b>14</b>
<b>3. Results of the Issues Assessment Process</b>	<b>15</b>
<b>Assumptions made during the Assessment</b>	<b>15</b>
<b>Summary of the Results</b>	<b>15</b>
Overall vision and strategic objectives	15
Issue 1 - Identifying additional opportunities for the development of new homes	16
Issue 2 –Achieving the right mix of affordable and market-priced housing	17
Issue 3 – Achieving a mix of dwelling sizes to meet housing need (e.g. mix of one and two bedroom flats and larger family homes	18
Issue 4 – Deciding the right level of density for new residential development	18
Issue 5 - Where should we allow new conversions of houses into flats?	19
Issue 6 – Increasing the number and variety of jobs in the borough	20
Issue 7 - Achieving an adequate supply of affordable business premises	21
Issue 8 – Increasing Lambeth’s sustainable waste management capacity	22
Issue 9 - Where should we locate tall buildings, subject to safeguarding protected views and World Heritage Sites	23
<b>Appendix 1: Appraisal Matrices</b>	<b>24</b>

# 1. Introduction

## Background

The preparation of the Lambeth Local Development Framework (LDF) Core Strategy is being subject to a full integrated sustainability appraisal (SA) and strategic environmental assessment (SEA) in line with the requirements of:

- Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004 (which requires a environmental assessment to be carried out on certain plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment); and
- The Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12 (PPS12) (which requires sustainability appraisal (SA) of all emerging Development Plan Documents and Supplementary Planning Documents).

The sustainability appraisal is being carried out by CAG and ENVIRON using a team of consultants experienced in SA and SEA of local authority spatial planning documents.

## Purpose of the Sustainability Appraisal

The purpose of the sustainability appraisal is to promote sustainable development by integrating sustainability considerations into the plan making process. This is done through a number of stages:

- The production of an SA scoping report (in October 2008), which examined the sustainability issues in the area. The issues identified in the scoping report were used to produce a sustainability appraisal framework against which the plan could be measured. The scoping report can be accessed here: <http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/LocalDevelopmentFramework%28LDF%29-SustainabilityAppraisalScopingReportConsultation.htm>;
- The production of an issues and options assessment briefing paper (this report) which outlines the results of the sustainability appraisal of the LDF Core Strategy issues and options report (see below for more details). The SA team has examined the sustainability effects of the issues and options put forward

for consideration and this report provides recommendations to the Council as to how to develop the preferred options in a sustainable manner; and

- The next stage of the SA will be the appraisal of the preferred options. This will be the formal SA report under the terms of the SEA Regulations. The results of the preferred options appraisal will be used by the council to develop the final submission draft of the plan.

## This Report

The purpose of SA is to integrate sustainability and environmental considerations into plan making. In order to do this, it is necessary for plan makers to be aware of the implications of their decisions as early as possible in the planning process. Assessing issues and options helps to ensure that sustainability considerations are integrated into plan making at the earliest stages. Therefore, the purpose of this report is to outline the sustainability effects of the issues and options in order to guide the plan makers as they write the preferred options document.

This document presents the findings of the sustainability appraisal of the Lambeth Core Strategy Issues and Options Report (London Borough of Lambeth, *Preparing the Lambeth Local Development Framework Have your say - April 2008 – Core Strategy Issues and Options*) (see <http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/PreviousconsultationsontheLocalDevelopmentFramework%28LDF%29.htm>).

## The Lambeth Local Development Framework

Spatial planning in Lambeth is currently guided by *The London Plan (consolidated with Alterations since 2004)* and *Lambeth Unitary Development Plan (2007)*. The process is also influenced by a variety of specific strategy and policy documents at the national, regional and local level which relate to specific issues such as employment land, open space, biodiversity etc.

The Government has introduced comprehensive changes to the development planning system via the Planning and Compulsory Purchase Act 2004. Under the terms of this Act, Local Planning Authorities (LPAs) are obliged to replace their adopted Local Plans with new-style plans, to be known as a Local Development Framework (LDF).

The London Borough of Lambeth has begun the preparation of the Local Development Framework (LDF) Core Strategy and Development Control Policies. This will eventually take over the role of the spatial planning framework for the area.

## 2. Methodology of the Issues Assessment Process

### Introduction

Sustainability appraisal is being carried out as an integral part of the LDF Core Strategy preparation and has a number of set stages. The stages that have been carried out so far are shown in Table 1.

**Table 1: SA Stages**

DPD Stage	SA Stage	Purpose of the SA Stage
Pre-production / evidence gathering	<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>	
	A1: Identifying other relevant policies, plans and programmes and sustainability objectives.	To document how the plan is affected by outside factors and suggest ideas for how any constraints can be addressed.
	A2: Collecting baseline information.	To provide an evidence base for sustainability issues, effects prediction and monitoring.
	A3: Identifying sustainability issues and problems.	To help focus the SA and streamline the subsequent stages, including baseline information analysis, setting of the SA Framework, prediction of effects and monitoring.
	A4: Developing the SA framework.	To provide a means by which the sustainability of the plan can be appraised.
	A5: Producing scoping report and consulting on the scope of the SA.	To consult with statutory bodies with social, environmental, or economic responsibilities to ensure the appraisal covers the key sustainability issues.
Production	<b>Stage B: Developing and refining options and assessing effects</b>	
	B1: Testing the DPD objectives against the SA framework.	To ensure that the overall objectives of the DPD are in accordance with sustainability principles and provide a suitable framework for developing options.
	B2: Developing the DPD options.	To assist in the development and refinement of the options, by identifying potential sustainability effects of options.

The scoping phase of the SA (Stage A) resulted in the production of a SA framework which will be used to test the plan. This is shown in Table 2. Please note that this SA framework is different to that presented in the SA scoping report as changes have been made in accordance with comments from consultees in response to the scoping report consultation.

**Table 2: SA Framework**

SA Objective	Appraisal prompt questions and targets	Targets
<b>SOCIAL</b>		
<p>1. Crime and safety. Ensuring safe communities with reduced crime and disorder.</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• reduce the opportunities to commit crime and engage in antisocial behaviour?</li> <li>• create the conditions for communities to develop which will support a reduction in crime and the fear of crime?</li> <li>• reduce Lambeth’s vulnerability to major challenges such as climate change and water shortages?</li> <li>• reduce Lambeth’s vulnerability to terrorist action?</li> <li>• reduce the need for motorised travel?</li> <li>• encourage walking and cycling, for instance by reducing traffic accidents to pedestrians and cyclists?</li> </ul>	
<p>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.</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• protect health and wellbeing?</li> <li>• reduce poverty, including child poverty?</li> <li>• reduce health inequalities?</li> <li>• improve mental, emotional and physical health, and wellbeing?</li> <li>• encourage the development of healthy neighbourhoods?</li> <li>• make walking and cycling more attractive relative to other alternatives?</li> <li>• improve access to health care services?</li> </ul>	<p>London Plan performance indicators:                      By 2026 reducing by at least 10% the gap between life expectancy at birth in Areas for Regeneration and the average for London as a whole;                      By 2015 reducing by at least 10% the gap between the age standardised death rate from coronary heart disease per 100,000 population in Areas for Regeneration and the average for London as a whole</p>
<p>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</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel?                             <ul style="list-style-type: none"> <li>○ Schools</li> <li>○ Nurseries</li> <li>○ GPs and hospitals</li> <li>○ Libraries</li> </ul> </li> </ul>	<p>London Plan performance indicator:                      An increase in the provision of childcare places per 1000 under 5s, particularly in Areas for Regeneration.</p>

SA Objective	Appraisal prompt questions and targets	Targets
to key services and facilities.	<ul style="list-style-type: none"> <li>o Places of worship</li> <li>o Food shops (especially those selling fresh, healthy food)</li> <li>o Community centres</li> <li>o Children's play areas</li> <li>o Sports and recreation facilities</li> <li>o Open spaces and wildlife habitats</li> <li>o Police and emergency services</li> <li>o Banking facilities and post offices</li> </ul>	
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• promote equity, or fairness between population groups?</li> <li>• improve environmental conditions for Lambeth's deprived areas and deprived communities?</li> <li>• reduce poverty and social exclusion?</li> <li>• promote social cohesion within and between population groups?</li> <li>• enable social integration between minority groups and wider society?</li> </ul>	<p>London Plan performance indicators:</p> <p>Age specific unemployment rates for black and minority ethnic groups to be no higher than for the white population by 2016, 50% reduction of the difference by 2011.</p> <p>% of lone parents to be no higher than for the UK average by 2016, 50% reduction of the difference by 2011.</p>
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	<p>Will the Strategy:</p> <ul style="list-style-type: none"> <li>• increase access to good housing?</li> <li>• meet affordable housing targets?</li> <li>• meet sustainable housing standards?</li> <li>• increase the mix and type of housing, including family units?.</li> <li>• reduce actual noise levels and disturbances from noise?</li> <li>• tackle homelessness?</li> </ul>	<p>London Plan borough housing target: 11,000 additional homes (2007/8 to 2016/17) or 1,100 per annum.</p> <p>50% should be affordable and within this 70% social housing and 30% intermediate provision.</p> <p>'Mayor's Strategic Housing Investment Plan will set out the timetable for moving from Code for Sustainable Homes level 3 to higher levels'.</p> <p>Targets set for Opportunity Areas employment capacity and minimum homes (Waterloo; and Vauxhall)</p>



SA Objective	Appraisal prompt questions and targets	Targets
		<p>Lambeth Community Strategy: Aiming to achieve the council's policy for 50% affordable housing with subsidy and 40% without subsidy wherever possible in development proposals</p> <p>Lambeth LAA target – number of affordable homes delivered:</p> <ul style="list-style-type: none"> <li>• 480 – 2008/09</li> <li>• 550 09/10</li> <li>• 570 10/11</li> </ul> <p>Lambeth SPD on Sustainable Design and Construction:</p> <p>The Council aspires to BREEAM “Excellent” and seeks “Very Good” as a minimum standard.</p> <p>In line with the Energy Saving Trust’s minimum recommendation, the Council seeks the achievement of Code Level 3 as a minimum standard and aspires to Code Level 4 in the majority of developments.</p>
<p>6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• enhance the quality and quantity of open space and the public realm?</li> <li>• reduce the proportion of the public realm where noise precludes conversation or where other environmental factors (e.g. fumes) make it unpleasant to be?</li> <li>• promote community engagement?</li> <li>• promote interactions between different sectors of the community?</li> <li>• promote good governance?</li> <li>• promote wellbeing and help to make people feel positive about the area where they live?</li> </ul>	
ENVIRONMENTAL		

SA Objective	Appraisal prompt questions and targets	Targets
<p>7. 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.</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• protect sites, features and areas of historical, archaeological and cultural value/potential?</li> <li>• enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals)?</li> <li>• conserve and enhance the townscape/cityscape character, including historical, archaeological and cultural value/potential?</li> <li>• increase access to, enjoyment of and understanding of, historical, archaeological and cultural sites, features and areas?</li> <li>• Protect, enhance or create open space?</li> <li>• protect valued views?</li> </ul>	<p>Lambeth Open Space Strategy recommended that Lambeth should aim to double the number of good quality open spaces in the Borough</p>
<p>8. 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.</p>	<p>Will the Strategy:</p> <ul style="list-style-type: none"> <li>• reduce travel?</li> <li>• encourage a shift to more sustainable forms of travel: walking, cycling and public transport?</li> <li>• encourage greater efficiency in the transport network, such as through higher load factors?</li> <li>• integrate new development, especially residential development, with sustainable transport choices?</li> </ul>	<p>London Plan targets: Increasing the capacity of public transport in London by up to 50% by 2026.</p> <p>Reduce weekday traffic by 15% in central London where congestion charging applies; Achieve zero growth across the rest of inner London.</p> <p>London Plan performance indicators: A 5% increase in passengers and freight transported on the blue ribbon network from 2001-2011 Maintain at least 50% of B1 development in PTAL zones 5-6 and at least 90% of B2 and B8 development in zones 0-2.</p>
<p>9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• conserve and enhance habitats and provide for the long-term management of natural habitats and wildlife?</li> <li>• protect and enhance access to open space and improve the quality of publicly accessible green space?</li> </ul>	<p>London Plan targets: (those appropriate to Lambeth's BAP priority habitats): Conserve/Increase by 2015:</p> <ul style="list-style-type: none"> <li>• 1300 ha/ 20ha acid grassland</li> <li>• 12,800ha/ 20ha woodland</li> </ul>

SA Objective	Appraisal prompt questions and targets	Targets
	<ul style="list-style-type: none"> <li>increase and enhance the resilience of Lambeth's key priority habitats and species in line with its Biodiversity Action Plan's long term vision and objectives?</li> <li>encourage replacement of valuable lost habitat?</li> <li>bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens?</li> </ul>	<ul style="list-style-type: none"> <li>2,300 ha/ 1 saltmarsh or mudflat of Tidal Thames;</li> <li>1744 ha conserved ponds, lakes and reservoirs;</li> <li>185 ha conserved or created wasteland (equivalent to Lambeth's built environment habitat?)</li> </ul>
<p>10. 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.</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>reduce emissions of greenhouse gases by reducing energy consumption?</li> <li>increase the proportion of energy both produced and used from renewable and sustainable resources?</li> <li>reduce the impacts of climate change? e.g. urban heat island effect, flooding and drought?</li> <li>ensure adaptation to the future impacts of climate change?</li> <li>ensure that new and retrofitted development and infrastructure is located, designed and constructed to withstand the effects of climate change over its design life?</li> <li>promote high quality, appropriate design and sustainable construction methods in all types of building, including new build and retrofit?</li> <li>promote the highest standards of energy and environmental performance for new and existing buildings?</li> <li>minimise embedded carbon in new buildings and development?</li> </ul>	<p>London Plan targets: 60% reduction of CO2 emissions by 2050:</p> <ul style="list-style-type: none"> <li>15% by 2010</li> <li>20% by 2015</li> <li>25% by 2020</li> <li>30% by 2025.</li> </ul> <p>(against 1990 base)</p> <p>20% reduction in CO2 emissions from on site renewable energy generation for new developments.</p> <p>Identify sites for zero carbon developments.</p> <p>99 MW installed capacity electricity generated from renewable by 2010 rising to 375.1MW by 2020.</p> <p>London Plan performance indicator: Production of 945GWh of energy from renewable sources by 2010 including at least 6 large wind turbines.</p> <p>Lambeth LAA: Per capita Co2 emissions reductions of 2% (08/09), 5% (09/10) and 10% (10/11) on baseline of 5.5 tonnes per capita.</p> <p>Lambeth SPD on Sustainable Design and Construction:</p>

SA Objective	Appraisal prompt questions and targets	Targets
		<p>UDP Policy 34 requires all major development of more than 1,000 square metres or providing 10 dwellings or more to incorporate equipment for renewable power generation so as to provide at least 10% of their predicted energy requirements. This should be assessed in terms of CO2 emissions. The 10% predicted energy requirement will be assessed in terms of carbon dioxide emissions as this is now the standard approach taken to this issues in national policy and by the Mayor of London. It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10% through on site renewable energy generation, Policy 4A.7 in the London Plan aims to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The Council encourages and supports this aim for all applications.</p> <p>Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day.</p>
<p>11. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• improve the quality of water and waterbodies (surface and groundwater)?</li> <li>• reduce piped water consumption e.g. through reducing demand and encouraging recycling in households?</li> <li>• reduce waste water and sewage needing processing?</li> <li>• Make provision for water and sewerage infrastructure to</li> </ul>	<p>London Plan target: Maximum water use target of 105 litres per person per day for residential development.</p> <p>(To be reviewed in light of Code for Sustainable Homes targets, essential standard of 80 litres/ person / day by 2016 at latest).</p>

SA Objective	Appraisal prompt questions and targets	Targets
<p>management and sustainable use of water resources and to minimise flood risk.</p>	<p>service development?</p> <ul style="list-style-type: none"> <li>• support sustainable urban drainage?</li> <li>• minimise the risk of all types of flooding (tidal, fluvial, surface water and sewerage) to people and property and manage flood risks appropriately both now and in the long-term?</li> </ul>	<p>Achieve 50% attenuation of the undeveloped site's surface water run off at peak times: (this is a minimal target –London Plan policy 4a.14 states that developers should aim to achieve Greenfield run off from sites through incorporating rainwater harvesting and sustainable drainage.</p> <p>Lambeth SPD on Sustainable Design and Construction:</p> <p>Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day.</p>
<p>12. 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.</p>	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• minimise the production of waste, maximise recycling and reuse during construction, and decrease the demand for raw materials from unsustainable sources e.g. through reusing demolition material onsite and using products made from recycled materials?</li> <li>• make waste avoidance, reuse and recycling easy for residents and visitors?</li> <li>• help develop markets for recycled products by using them?</li> <li>• enable safe storage of waste and recycling, convenient for both residents and collectors?</li> <li>• make appropriate provision for waste management facilities in the Borough to help meet the London Plan apportionment and self sufficiency targets?</li> </ul>	<p>London Plan borough apportionment: 345,000 tonnes per annum by 2020 (municipal solid waste and commercial/ industrial waste). Current existing licensed capacity: 11,000 tonnes.</p> <p>Ensuring facilities to manage 75% (15.8 million tonnes) of waste arising in London provided by 2010 rising to 80% (19.2 million tonnes) by 2015 and 85% (20.6 mt) by 2020.</p> <p>Exceed recycling or composting levels in municipal waste of 35% by 2010 and 45% by 2015.</p> <p>Achieve recycling or composting levels in commercial and industrial waste of 70% by 2020</p> <p>Achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and</p>

SA Objective	Appraisal prompt questions and targets	Targets
		<p>80% recycling of that waste as aggregates in London by 2020)</p> <p>(boroughs need to ensure land resources available to implement the above).</p> <p>Boroughs in their DPDs should identify range of wm facilities to manage a capacity of 13mt municipal and commercial/ industrial waste to be provided 2005-2020.</p>
13. Air quality. To improve air quality.	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• reduce emissions of PM10, NO2 and ozone depleting substances?</li> <li>• help to achieve national and international standards for air quality (e.g. those set out in the Air Quality regulations 2000 and (Amendment) Regulations 2002 as well as local air quality management targets?</li> <li>• support the planting of trees?</li> <li>• promote the 'transport hierarchy'?</li> </ul>	
<b>ECONOMIC</b>		
14. Education and skills. To maximise the education and skills levels of the population.	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages?</li> <li>• contribute to up-skilling and to meeting skills shortages?</li> <li>• promote healthy, sustainable living?</li> </ul>	
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and	<p>Will the strategy...</p> <ul style="list-style-type: none"> <li>• improve the resilience of business and the economy e.g. through supporting indigenous and local business, diversification, corporate social responsibility, accommodating low income workers, supporting and driving the marketplace?</li> <li>• support employment opportunities in the most deprived</li> </ul>	<p>London Plan targets: Achieve 40,000 net additional hotel bedrooms by 2026</p>

SA Objective	Appraisal prompt questions and targets	Targets
environmental performance of businesses.	<p>areas and groups and stimulate regeneration?</p> <ul style="list-style-type: none"> <li>• enable people to live better for a given income by reducing their need for paid goods and services?</li> <li>• contribute to sustainable tourism?</li> </ul>	
16. 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.	<p>Will the Strategy:</p> <ul style="list-style-type: none"> <li>• maximise regeneration benefits to the most deprived areas and communities?</li> <li>• promote the efficient, innovative and multifunctional use of land?</li> <li>• ensure the provision of adequate quantities and type of public realm?</li> <li>• protect the Borough's soil resource?</li> </ul>	London Plan performance indicator: maintain at least 96% of new residential development on previously developed land.
17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.	<p>Will the Strategy:</p> <ul style="list-style-type: none"> <li>• improve accessibility to employment, especially for local people?</li> <li>• improve employment opportunities among Black, Asian, Ethnic and Minority groups?</li> <li>• protect local employment land and uses?</li> <li>• provide additional housing near places of work?</li> </ul>	<p>South west sub region of London <i>projected</i> to provide 70,000 more jobs by 2026.</p> <p>Targets set for Opportunity Areas employment capacity and minimum homes (Waterloo; and Vauxhall)</p>

## Assessing the Issues and Options

As ODPM guidance<sup>1</sup> outlines, during the issues and options stage the effects of the strategic options must be assessed in broad terms. The aim of this assessment is to assist in the selection of the preferred options. Once the preferred options have been selected they will be assessed in more detail. The Issues and Options Consultation Paper puts forward nine issues, all of which have a number of options attached to them. All of these were appraised along with the vision and objectives of the plan. The elements of the plan that were appraised are shown below:

- Lambeth vision and strategic objectives;
- Issue 1 - Identifying additional opportunities for the development of new homes;
- Issue 2 – Achieving the right mix of affordable and market-priced housing;
- Issue 3 – Achieving a mix of dwelling sizes to meet housing need (e.g. mix of one and two bedroom flats and larger family homes);
- Issue 4 – Deciding the right level of density for new residential development;
- Issue 5 - Where should we allow new conversions of houses into flats?;
- Issue 6 – Increasing the number and variety of jobs in the borough;
- Issue 7 - Achieving an adequate supply of affordable business premises;
- Issue 8 – Increasing Lambeth’s sustainable waste management capacity; and
- Issue 9 - Where should we locate tall buildings, subject to safeguarding protected views and World Heritage Sites?

Matrices have been used to identify the sustainability effects of the options. These matrices are designed to help identify the potential impacts of the plan on each SA topic (guided by the SA Questions). The matrix for the assessment of the options is a relatively simple matrix. It allows for a discussion and comparison of each of the options under consideration. The simplicity of the matrix is designed to reflect the fact that strategic options should be assessed in broad terms.

---

<sup>1</sup> ODPM, 2005: *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks*. The Stationary Office



# 3. Results of the Issues Assessment Process

## Assumptions made during the Assessment

Sustainability appraisal relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. The assessment has been carried out and reported using a matrix enabling an expert, judgement-led qualitative assessment to be made in most cases. A 'precautionary approach' is taken, especially with qualitative judgements and mitigation is suggested if there is any doubt as to the effect of the plan.

## Summary of the Results

The full results of the appraisal are shown in Appendix 1. A summary of the results is detailed below.

## Overall vision and strategic objectives

The vision and strategic objectives broadly portray a sustainable approach to the Borough's future development. There is a balanced approach to social, environmental and economic issues and a real desire for a low carbon future based on sustainable design, efficient use of resources, provision of local jobs and services and promotion of sustainable modes of travel. This is reflected by the broad support for this vision in the consultation. There are some detailed omissions, set out below, but these could arguably be addressed in the detail of the Core Strategy and its related DPDs.

We recognise that as a vision and set of strategic objectives, and as such this statement cannot include all the issues relevant to the borough's core plan. However, the issues and options report covers predominantly housing issues and the preferred options will obviously need to cover a broader range of issues. As the preferred option report is developed, the following issues should be considered for inclusion in the objectives or elsewhere in the strategy:

- Quality of housing is important and should be referenced (not just supply and affordability);
- The design of high density environments should respect local amenity;

- Protecting valued views, especially in view of the push for high density development;
- Reducing carbon emissions from transport as well as other sources;
- Increasing public transport capacity could usefully be referred to in the strategic objectives;
- Strategic objective 10 could be expanded to read 'and reduce the need to travel by private car';
- Design policies and other policies to protect local biodiversity will need to address possible tension between development and protection of local wildlife amenity;
- Making specific reference to provision of renewable energy, including on-site generation;
- Making specific reference to preparing the borough to adapt to climate change;
- Consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth;
- The identification and allocation of waste management sites to meet the London Plan apportionment; and
- The strategic objectives should also target the regeneration of London Plan Areas of Regeneration.

## **Issue 1 - Identifying additional opportunities for the development of new homes**

The appraisal found that overall, Options C and E are the most sustainable, although consideration should be given to enhancing and maintaining the public realm in order to increase safety and reduce the fear of crime. Options A, B and D should be carefully planned, with consideration given to public transport links and access to employment opportunities.

The following recommendations were made for the future development of the issue:

- Consultees have highlighted a lack of certain types of infrastructure in certain places (i.e. Waterloo needs open space, West Norwood needs new family facilities) and this should be dealt with if possible through the policy;

- All of the options should include provisions for public realm and the promotion of social cohesion;
- All of the Options should integrate public transport availability into their design; and
- An issue in Lambeth is linkages between acid grassland sites. All three major sites in Lambeth (Eardley Road Sidings, Peabody Hill and Streatham Common) are isolated from each other with no green connections between them. If possible, actions should be included in the LDF to increase these connections.

## **Issue 2 –Achieving the right mix of affordable and market-priced housing**

Option A and B could be equally as successful in providing numbers of affordable homes. However, both approaches could lead over time to similar levels of affordable housing in every area of the Borough (depending on how option B is implemented – it appears to be advocating an equalisation in proportions of affordable housing in the different areas in the Borough). This is positive in that it would give people a wider choice as to where they can live and would provide more mixed communities generally. However, it does not necessarily address the concern of Lambeth residents that there are particular shortfalls of affordable housing in particular areas (and these might be areas that already have high levels of affordable housing).

Some consultees felt that it is best to focus social housing in existing areas to allow family groups to stay within the same locality. Therefore, a flexible approach is needed (Option B) but one that does not seek to equalise the proportions of affordable houses across the different areas of the Borough if that is not the right approach. This needs to be based more on needs and levels of services available. The sustainability of each of the options are broadly similar and are dependent on how other (particularly development control) policies are developed in the plan.

The following recommendations were made for the future development of the issue:

- Clarification of how option B will be implemented. If this flexible approach is taken forward, it needs to be based on needs and levels of services available. Developers should be required to undertake this research to ensure that needs are met and the facilities are available to service all housing;
- The provision of community facilities is vital in order to build community relations and not foster a fear of crime that consultees have highlighted could occur when bringing affordable housing into proximity to market housing. This importance of facilities in fostering cohesion is very prominent in consultees' responses in Lambeth; and

- It is vital that if affordable housing is being built as part of a development the design and quality should be the same as the market housing in order to foster community cohesion. Best practice guidance and London policy guidance should be followed in this regard.

### **Issue 3 – Achieving a mix of dwelling sizes to meet housing need (e.g. mix of one and two bedroom flats and larger family homes)**

The achievement of a mix of dwelling sizes contributes to mixed communities ensuring greater diversity of residents. This has a number of benefits. However, out of the three options, option C is most likely to lead to a true mix of residents because it is likely to be better at identifying and resolving particular shortfalls. Option A may lead to a mix but possibly not enough to solve particular shortfalls and option B may lead to an oversupply of certain types of development in certain areas and an undersupply in others. The sustainability of each of the options are broadly similar and are dependent on how other (particularly development control) policies are developed in the plan.

The following recommendations were made for the future development of the issue:

- Ease of access to healthcare facilities should be considered for all of the options and the type of healthcare needed to support the types of communities planned;
- Access to green space should be considered for all new dwellings regardless of size and improvements made where necessary;
- One issue that people are concerned about is the amount of “churn” in the housing stock and they feel that flat conversions contribute to this. Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing;
- Access to shops and services should be considered for all new dwelling sizes and improvements made where necessary. In some areas, a proportion of all dwellings should be designed for elderly and/or disabled residents; and
- The energy efficiency of housing is not considered in the policy (and generally in the issues and options paper). Policies need to be developed on renewable energy, energy efficiency and sustainable design.

### **Issue 4 – Deciding the right level of density for new residential development**

The main impact of both of the options is likely to depend on the ability of the planning system to ensure that adequate services are available for everyone and

this access to services is going to be vital in deciding where to locate high density development. This could be achieved in both options. However, there is more of a risk with Option A that needed facilities are over-subscribed in already high density areas. It will also be important for housing to be near to public transport links. Option B explicitly states this but the effect of Option A is more uncertain as it depends on the access to public transport in the particular areas where development is taking place. If Option A is taken forward access to public transport should be a factor in deciding where to locate development. There is a concern amongst consultees that Lambeth is already a densely populated borough. However, most consultees when given the option would prefer the council to direct high density residential development away from existing high density areas and towards lower density areas with good public transport provision (Option B). This is a sustainable option as long as adequate services can be provided. Some consultees also felt that high density housing should be provided through regeneration of existing unoccupied and run down buildings and this should be prioritised wherever possible as a good use of land. On balance, Option B is more popular with consultees and scores more positively in the appraisal.

The following recommendations were made for the future development of the issue:

- Both options have the potential to score positively if adequate services are provided and this should be a key factor in deciding where to locate high density development. If Option A is taken forward access to public transport should be a factor in deciding where to locate development;
- Some consultees also felt that high density housing should be provided through regeneration of existing unoccupied and run down buildings and this should be prioritised (whichever option is chosen) wherever possible as a good use of land; and
- Certain design features can be integrated in high density development that can assist biodiversity including green roofs. Green areas and landscaping in high density developments is also more likely to be in the public realm, therefore, there are more opportunities to integrate biodiversity measures. Policies should be put in place to encourage biodiversity enhancement.

## **Issue 5 - Where should we allow new conversions of houses into flats?**

Consultees' views about flat conversions are mixed. While some feel they should be allowed anywhere and others think they should be stopped in areas that already have a high proportion, the largest group think flat conversions should be allowed if there is a proven housing need for this sort of accommodation. The main concerns related to flat conversions are the lack of infrastructure available to service the increased number of people in the area (especially parking) and the

fact that they can contribute to (especially with rented accommodation) “churn” in the housing stock. Both of these factors can contribute to an unhealthy and unsustainable housing environment. Option A could potentially have a negative effect on both these factors. Option B could have a positive effect in that it seeks not to overload certain communities with flat conversions. However, it will not be positive in addressing the very real housing shortfall in some areas that can only be solved by allowing flat conversions in some circumstances. Therefore, Option C is seen as the most positive option as it can address both factors. Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing and how much needed infrastructure will be provided. The sustainability of each of the options are broadly similar and are dependent on how other (particularly development control) policies are developed in the plan.

The following recommendations were made for the future development of the issue:

- Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing and how much needed infrastructure will be provided;
- It is important that if Option A or C are progressed then issues such as parking are addressed as these can detract from valued townscape;
- Access to green space should be considered for all new dwellings regardless of size and improvements made where necessary;
- The energy efficiency of housing is not considered in the policy (and generally in the issues and options paper). Policies need to be developed on renewable energy, energy efficiency and sustainable design; and
- Another issue with flat conversions is the fact that changes in design of roof spaces for houses undergoing renovation can prevent access to the roof space for birds. This is an important issue as house sparrow levels have decreased in London by 70% from 1994-2002. Concreting over gardens to provide parking might also reduce habitats available for birds. Some mitigation will be needed to reduce this as the policy is developed.

## **Issue 6 – Increasing the number and variety of jobs in the borough**

The consultation response showed that the majority of community group representatives considered that economic growth should focus on local opportunities for local people via small scale, niche jobs in the arts, retail, cultural and hospitality sectors. However, representatives from larger organisations thought that local employment can be achieved through large and even multi-

national businesses. All groups agreed that it is of paramount importance to safeguard existing employment space as far as this is possible and that the development of business premises should be flexibly determined by local need.

Options B and D score more favourably from a sustainability perspective given that they are more likely to deliver the type and variety of employment that the Borough wants to attract and the Council may have more of an influence over the sectors involved and could influence the wider environmental and social sustainability of future employers. Key growth sectors (options B and D) have the added advantage of being specifically supported by policies in the London Plan (and the London Development Agency's Economic Development Strategy and funding schemes).

Option D would perhaps be the most favourable given that it would provide a range of commercial premises (in terms of size and affordability) and so help to foster the smaller companies (e.g. SME and self employed) as well as the larger companies. This would provide improved social benefits, especially to equalities (helping equality target groups) and health (access to employment a key determinant of health). This would appear to best meet the consultees' views.

The following recommendations were made for the future development of the issue:

- Broad locations identified for commercial development should be well served by public transport, cycling and walking. They should serve to meet the needs of Areas for Regeneration identified in the London Plan.

## **Issue 7 - Achieving an adequate supply of affordable business premises**

Lambeth is among the most socially and economically deprived local authority districts in the country. The population is young and diverse, unemployment remains relatively high and nearly a fifth of all residents have no qualifications. Lambeth suffers from a high rate of economic inactivity (Lambeth's economically active population was 67.6% in comparison to a London figure of 74.3%<sup>2</sup>). It also suffers from high levels of need, with higher than average proportions of lone parents and BAME (Black and Minority Ethnic) groups who have lower than average employment rates. Other factors within the London labour market include a high level of competition for jobs, putting young people, the lower-skilled and parents at an increasing disadvantage. There are also particular problems in London accessing affordable childcare.

Against this backdrop, Option A is unlikely to deliver the affordable units required by the Council.

---

<sup>2</sup> Nomis web data for October 2005–September 2006

Option B is likely to present risks in terms of unwanted and unused units (which could have negative crime and liveability impacts) and be a waste of scarce resources.

Option C would provide the most favourable sustainable option given that:

- It meets identified need;
- It would reduce the need to travel, reduce CO<sub>2</sub> emissions and is preferable from an air quality perspective; and
- It makes the best use of scarce resources, including land and environmental resources.

No recommendations were made for the future development of the issue.

## **Issue 8 – Increasing Lambeth’s sustainable waste management capacity**

Managing waste sustainably in London will require significant infrastructure development and the Core Strategy needs to ensure that the appropriate infrastructure is in place within the borough to maximise recycling, composting and waste disposal at source, as well as for the effective operation of the waste collection service. Official consultation respondents think that integrating waste collection, treatment and disposal as far as possible within major new residential and commercial developments is the best option for improving sustainable waste management. However, there is likely to be a need for some bigger sites even if only for storage. Therefore, a combination of both options is likely to be needed.

All waste sites are likely to have some sustainability effects but the extent of these is dependent on the size of the sites and the particular waste management method used on site. Smaller neighbourhood facilities (Option B) could have more impact on issues like noise and amenity because sites are located nearer to residential areas. However, the nature of the facilities located on such sites are likely to be smaller and more “neighbourhood friendly” than larger sites. Smaller sites are also likely to reduce the distance waste travels to be treated, thus reducing greenhouse emissions. Larger sites may have more visual impact because of their size and HGV movements are also likely to be higher. However, because they are more likely to be located in industrial type areas, the impact may be less. In addition, larger facilities might have more space to build in mitigation (especially habitat mitigation). Both options are likely to be positive in terms of employment and skills as the development of a green industries sector will lead to new training and employment opportunities for Londoners and contribute to sustainable economic growth. Both options are likely to be positive but it is important that people with the right skills are trained especially with the move to new waste management technologies.



The following recommendations were made for the future development of the issue:

- Sensitive design of facilities is key for both options and should be built into policy;
- Habitat mitigation should be built into both options (but especially option A) where possible;
- Option B gives a more efficient use of land. Option A may take land from much needed employment uses. However, both options are likely to be needed so options need to be developed which minimise land take from new larger facilities; and
- Siting waste management facilities in an AQMA is likely to give rise to some air quality issues which will need to be addressed for each site.

### **Issue 9 - Where should we locate tall buildings, subject to safeguarding protected views and World Heritage Sites**

Option A is very reactive to planning applications and would not give local people any certainty about the future location of tall buildings. Options B and C give more opportunity to plan pro-actively and a combination of the two would enable the council to consider the factors that are necessary for successful high rise development (and the areas that most successfully fulfill these) and also the areas which (for any reason) would not be able to sustain such levels of development. Two factors that are important in making tall buildings a success are good design (and management) and location of tall buildings in areas where adequate public services are available. Option A in particular poses a risk that tall buildings will be located in areas where public services are already over-subscribed. More consideration can be given to adequate services through Options B and C.

The following recommendations were made for the future development of the issue:

- Consultees are particularly concerned that high rise buildings don't work well with social housing (especially when not built to a high standard) and this applies especially to elderly and other vulnerable people. Can this be addressed in policy? This could either be through limiting tall buildings to mainly private development or offices or through design and management policies.

# Appendix 1: Appraisal Matrices

<b>Vision and Strategic Objectives</b>	
<p><b>Policy/ or option: Vision:</b> By 2020 Lambeth will be at the centre of London’s thriving economy and will be home to a skilled workforce and a growing number of businesses and jobs accessible to local people. Lambeth will be known for its cutting edge culture and creativity, for its vibrant, welcoming and safe town centres, and for the world class South Bank Centre. Lambeth’s neighbourhoods will house mixed, cohesive communities that thrive on the diversity of their population. They will be safe, healthy, walkable areas that enable ‘low carbon’ lifestyles and are accessible to all. Although high in density, they will excel in the sustainable design and management of their built environment and public spaces. Lambeth’s communities will foster active, enterprising citizens, empowered to expect and deliver excellent local services, including health, social care, education, transport, policing, leisure, open space and shops. The achievements of Lambeth’s young people will be widely celebrated. The level of worklessness in the borough will have significantly declined.</p> <p><b>Strategic Objectives</b></p> <ol style="list-style-type: none"> <li>1. Increase the overall supply and mix of housing, including affordable housing.</li> <li>2. Provide the essential infrastructure to support population growth.</li> <li>3. Develop mixed, cohesive, safe communities accessible to all.</li> <li>4. Provide good access to local services and community facilities within neighbourhoods.</li> <li>5. Increase the number and variety of jobs in the local economy, including local jobs for local people.</li> <li>6. Support the growth of key economic sectors through new business development, business retention and inward investment.</li> <li>7. Create viable, safe and well managed town centres.</li> <li>8. Support the regeneration and renewal of London Plan Opportunity Areas.</li> <li>9. Reduce carbon emissions from residents, businesses, public services and buildings.</li> <li>10. Increase public transport accessibility and promote walking and cycling.</li> <li>11. Maximise the efficient use and management of resources, including water, energy and waste.</li> <li>12. Create distinctive local places through excellent design, valuing heritage, identity and the natural environment.</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	The vision and strategic objectives seek to improve safety in the borough, for example creating safer environments, town centres and communities. There is little detail in these strategic objectives, however the following should assist in tackling crime and reducing the fear of crime: developing mixed cohesive communities; improving access to community facilities; increasing the amount of local jobs; better managed town centres; promotion of walking and cycling; better design.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health	The vision and strategic objectives seek to create healthy neighbourhoods, with excellent local health services. Whilst there is no strategic objective specifically on health, there are a number of objectives which address the key determinants of health or related issues, for instance:

<b>Vision and Strategic Objectives</b>	
inequalities and by reducing the causes of ill health.	<ul style="list-style-type: none"> <li>• More affordable housing;</li> <li>• Improving safety;</li> <li>• Improving employment opportunities;</li> <li>• Promoting active travel (walking and cycling); and</li> <li>• Improving public transport (which should help to reduce car travel).</li> </ul> <p>The <i>quality</i> of housing is an important determinant of health and should be included, i.e. it's not just about providing more affordable housing <i>per se</i>. Other important contributing factors to people's health that are omitted are: air quality (London's poor air quality is primarily due to road traffic, see objectives 8 and 13); and road safety.</p>
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.	<p>Strategic objective 4 seeks to '<i>provide good access to local services and community facilities within neighbourhoods</i>'. Accessibility is stressed throughout the vision and strategic objectives. The diversity of the local population is seen as a key strength, although the only equality group specifically mentioned is young people.</p>
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<p>Whilst diversity is recognised as a key strength, there is no reference to specific equality groups with the exception of young people. Tackling worklessness will greatly assist this objective. A number of the strategic objectives will help to ensure equitable outcomes for all communities (particularly those most liable to experience discrimination, poverty and social exclusion), including:</p> <ul style="list-style-type: none"> <li>• More affordable housing;</li> <li>• Improving safety;</li> <li>• Improving employment opportunities (particularly local jobs for local people);</li> <li>• Providing good access to local and community services;</li> <li>• Regenerating the London Plan Opportunity Areas.</li> </ul> <p>The promotion of cohesive and mixed communities should assist in promoting equity and fairness between groups. Improving design, including sustainable design and open spaces will also improve the local environment for all communities, including those suffering disadvantage.</p>
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	<p>Increasing the overall supply and mix of housing, including affordable housing, will positively contribute to this objective.</p> <p>The issue of housing quality (and decent homes) could usefully be referenced in strategic objective 1. The promotion of 'high density' environments could compromise local amenity: design will be important (equally promoting high densities in certain parts of the borough could serve to protect 'lower density' amenity elsewhere). The issue of improving the quality of the existing built environment and creating attractive neighbourhoods was picked up during the public consultation.</p>
6. Liveability and place. To <u>design</u> and	<p>The vision and strategic objectives appear to be geared to the delivery of this objective.</p>

<b>Vision and Strategic Objectives</b>	
sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	Greater clarity could be given to the definition of 'mixed communities' addressing housing size and tenure, as well as age, ethnicity and culture of residents.
<b>ENVIRONMENTAL</b>	
7. 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.	Objective 12 seeks to 'create distinctive local places through excellent design, valuing heritage, identity and the natural environment'. Elsewhere in the vision there are references to excelling in sustainable design as well as the management of the built environment and open spaces. There is nothing in the vision and strategic objectives about 'valued views', which could be affected by the drive for high density development. The vision highlights the issue of seeking high density development whilst also ensuring sustainable design and good management of the built environment and open space.

## Vision and Strategic Objectives

8. 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.

The vision and strategic objectives contain a number of aspirations and policies which should contribute positively to this objective.

In particular:

- Promotion of local jobs for local people should assist in reducing the need to travel (objective 5);
- Objective 10 promotes public transport, walking and cycling;
- Objective 2 promotes essential infrastructure for population growth, which should include transport infrastructure;
- Objective 4 promotes good access to local services and facilities, which should link with the public transport, walking and cycling promotion; and
- Objective 3 promotes walkable scale mixed communities.

However, objective 9 could be extended to also seek to reduce carbon emissions from transport. Whilst, transport CO<sub>2</sub> emissions in London have stayed static since 1990 despite the rapid growth of London's population and economy (due to high long-term levels of public transport use) such emissions are still important: ground based transport emissions comprise 22% of London's total CO<sub>2</sub> emissions (Mayor's Climate Change Action Plan, 2007).

Transport is a key issue for the borough as it is for London as a whole. The objectives referred to above and the promotion of high density developments, ***presuming these are located in areas well served by public transport***, should assist in promoting more sustainable forms of transport and reducing the need to travel. Therefore, in determining applications for development and any conditions attached to implementation, including those relating to the phasing of developments, account should be taken of the availability of adequate public transport access and capacity, and the development's transport impact.

However, public transport capacity is a key issue in Lambeth, as in much of London (the number and rate of people it can carry). This includes lack of fixed link lines, lack of stations, lack of capacity at stations and on the lines themselves. In some cases significant developer contributions will be needed to secure them/bring them forward. Individual developments may not, in themselves, have a significant impact on public transport capacity but may add to existing problems, or impact on future predicted problems. The Council's adopted UDP therefore states that each individual development needs, therefore, to be assessed in light of existing and future predictions of capacity. Policy 9 of the UDP advises refusal of planning permission for development which contributes to a transport capacity shortfall, unless measures are secured as part of the application to make this acceptable. Increasing public transport capacity could usefully be referred to in the strategic objectives.

As the Scoping Report highlights, road traffic is the primary cause of air pollution in Lambeth, as well as the rest of London, affecting health, making breathing problems, such as asthma, and heart problems worse. The results of the Council's own research showed that, despite improvements in air quality in Lambeth over the next 4 to 5 years, two pollutants, nitrogen dioxide and fine particulates, are likely to fail Government targets. Similarly, London is predicted to fail the European limit values for PM<sub>10</sub>, NO<sub>2</sub> and Ozone (O<sub>3</sub>). In 2007 75% of Lambeth was covered by Air Quality Management Areas (AQMA) compared to approximately 50% of London (2003).

Therefore, strategic objective 10 could be expanded to read 'and reduce the need to travel by private car'.

<b>Vision and Strategic Objectives</b>	
<p>9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.</p>	<p>Objective 12 states that the natural environment will be valued. However, the drive for higher density development and the push to meet housing targets is likely to place a strain on green spaces of wildlife value that provide local nature conservation amenity. Design policies and other policies to protect local biodiversity will need to address this possible tension.</p>
<p>10. 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.</p>	<p>The vision and strategic objectives contain a number of aspirations and policies which should contribute positively to this objective.</p> <p>In particular:</p> <ul style="list-style-type: none"> <li>• Objective 9 to reduce carbon emissions (although, as noted above this should include transport emissions);</li> <li>• Creating neighbourhoods which enable 'low carbon' lifestyles;</li> <li>• High density living and sustainable design;</li> <li>• Various initiatives which should reduce the need to travel or promote more sustainable travel modes; and</li> <li>• Objective 11 which seeks to maximise the efficient use of energy.</li> </ul> <p>However, the text could be improved by:</p> <ul style="list-style-type: none"> <li>• Including transport emissions in objective 9;</li> <li>• Making specific reference to provision of renewable energy, including on-site generation;</li> <li>• Making specific reference to preparing the borough to <b>adapt</b> to climate change.</li> </ul> <p>Climate change adaptation includes addressing issues around flooding, summer overheating, water demand (summer drought) and increased likelihood of extreme weather conditions. Many of these issues can be addressed by sustainable design techniques for new development.</p> <p>Large parts of the north of the Borough are identified as being Flood Zone 2 according to the Environment Agency, with some areas in the north identified as Flood Zone 3. PPS25 directs new development away from Zones 2 (medium probability of flooding) and 3 (high probability or functional floodplain) into Zone 1 (low probability). Therefore, consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth. The Borough is currently preparing the Strategic Flood Risk Assessment (SFRA) for the Borough which will clarify areas at risk from flooding.</p>

<b>Vision and Strategic Objectives</b>	
<p>11. 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.</p>	<p>Strategic objective 11 promotes the efficient use and management of water. Other parts of the vision and strategic objectives support sustainable design. These should benefit this objective.</p> <p>However, water use is a key issue for new development especially in London and the South East. Climate change is predicted to result in drier summers and additional pressure on London's water resources. The London Plan sets a target for maximum water use of 105 litres per person per day for residential development. However, it states that this will be reviewed in light of Code for Sustainable Homes targets, with a view to adopting an 'essential standard' of 80 litres/ person / day by 2016 at the latest. The Council's SPD on Sustainable Design and Construction states that the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day.</p> <p>Given the population growth expected in London and Lambeth and the associated drive for house building it is important that sustainable design methods and techniques are employed to ensure the conservation of water, reduce demand and maximise efficiency.</p>
<p>12. 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.</p>	<p>Strategic objective 11 seeks to maximise the efficient use and management of resources, including waste.</p> <p>The London Plan borough apportionment of waste to be managed in Lambeth of 345,000 tonnes per annum by 2020 (municipal solid waste and commercial/ industrial waste) will be a challenge given that the current existing licensed capacity is 11,000 tonnes. The LDF will need to identify and allocate waste management sites to meet this apportionment. Given the borough's strong desire to maintain its employment base, this may create tensions as the London Plan identifies employment sites as being broadly appropriate for additional waste facilities.</p>
<p>13. Air quality. To improve air quality.</p>	<p>Air quality or pollution issues are not referred to in the vision of strategic objectives. However, as referred to in the transport and travel objective above (8), the vision and objectives should contribute to the promotion of more sustainable transport modes and to a reduction in the need to travel. As poor air quality is primarily caused by road traffic, these initiatives should help to improve air quality.</p> <p>As the Scoping Report highlights, road traffic is the primary cause of air pollution in Lambeth, as well as the rest of London, affecting health, making breathing problems, such as asthma, and heart problems worse. The results of the Council's own research showed that, despite improvements in air quality in Lambeth over the next 4 to 5 years, two pollutants, nitrogen dioxide and fine particulates, are likely to fail Government targets. Similarly, London is predicted to fail the European limit values for PM10, NO2 and Ozone (O3). In 2007 75% of Lambeth was covered by Air Quality Management Areas (AQMA) compared to approximately 50% of London (2003).</p>
<b>ECONOMIC</b>	

<b>Vision and Strategic Objectives</b>	
<p>14. Education and skills. To maximise the education and skills levels of the population.</p>	<p>The vision provides a clear aspiration for a skilled workforce and for excellent local education services for Lambeth's communities. This is emphasised by the sentence: 'the achievements of Lambeth's young people will be widely celebrated'.</p> <p>However, none of this aspiration is directly reflected in the strategic objectives. This could be a reflection of the objectives concentrating more on spatial aspects. Schools and colleges would presumably be included within the essential infrastructure referred to in objective 2, as well as being part of essential community services and facilities covered by objective 4. Issues around skills should be addressed in the detail that accompanies objectives 5 and 6.</p> <p>The provision of local schools has been identified as an issue in Lambeth and provision of sufficient school places is an important aspect of sustainability, not only in terms of educational achievement, but also in terms of reducing the need to travel (the school run being a significant contributing factor to congestion and CO2 emissions). Interestingly, there were responses to the public consultation requesting an additional objective which specifically addressed the provision of school and youth facilities.</p>
<p>15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.</p>	<p>Strategic objectives 5 and 6 would contribute positively to this objective and there is a particular emphasis on 'local jobs for local people'.</p> <p>There is nothing in the vision and objectives about the social and environmental performance of businesses but these issues are perhaps too detailed for this strategy.</p>
<p>16. 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.</p>	<p>Strategic objective 8 supports the regeneration and renewal of London Plan Opportunity Areas. These areas have been identified as being capable of accommodating substantial new jobs or homes, rather than on any deprivation criteria. The London Plan identifies '<i>Areas for Regeneration</i>' as being those areas where there is substantial deprivation (within the 20% most deprived wards in London) and in need of regeneration. Most of the northern half of the borough comes into this category. The strategic objectives should also target the regeneration of such areas of regeneration.</p> <p>There is nothing in the vision and objectives about re-using previously developed land and buildings. This could be added to strategic objective 11 as land is clearly a valuable resource to be used wisely, although it is accepted that most development already occurs on previously developed land as there are very few parts of the borough that do not fall into that category. The issue of reusing buildings could be incorporated into sustainable design principles.</p>



<b>Vision and Strategic Objectives</b>	
<p>17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.</p>	<p>Strategic objectives 5 and 6 would contribute positively to this objective and there is a particular emphasis on promotion of local employment and business retention.</p> <p>Could be a possible tension with the competing use for land, especially from housing, but also other essential infrastructure such as waste management facilities.</p>
<p><b>Conclusions</b>  The vision and strategic objectives broadly portray a sustainable approach to the Borough's future development. There is a balanced approach to social, environmental and economic issues and a real desire for a low carbon future based on sustainable design, efficient use of resources, provision of local jobs and services and promotion of sustainable modes of travel. This is reflected by the broad support for this vision in the consultation. There are some detailed omissions, set out below, but these could arguably be addressed in the detail of the Core Strategy and its related DPDs.</p> <p><b>Uncertainties</b>  General level of detail.  Awaiting Strategic Flood Risk Assessment.</p> <p><b>Recommendations/Mitigation</b>  We recognise that as a vision and set of strategic objectives, and as such this statement cannot include all the issues relevant to the borough's core plan. However, the following issues should be considered for inclusion here or elsewhere in the strategy:</p> <ul style="list-style-type: none"> <li>• Quality of housing is important and should be referenced (not just supply and affordability).</li> <li>• The design of high density environments should respect local amenity;</li> <li>• Protecting valued views, especially in view of the push for high density development;</li> <li>• Reducing carbon emissions from transport as well as other sources;</li> <li>• Increasing public transport capacity could usefully be referred to in the strategic objectives;</li> <li>• Strategic objective 10 could be expanded to read 'and reduce the need to travel by private car';</li> <li>• Design policies and other policies to protect local biodiversity will need to address possible tension between development and protection of local wildlife amenity;</li> <li>• Making specific reference to provision of renewable energy, including on-site generation;</li> <li>• Making specific reference to preparing the borough to adapt to climate change;</li> <li>• Consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth;</li> <li>• The identification and allocation of waste management sites to meet the London Plan apportionment; and</li> <li>• The strategic objectives should also target the regeneration of London Plan Areas of Regeneration.</li> </ul>	

<b>Issue 1 - Identifying additional opportunities for the development of new homes.</b>	
<p>A. Allowing the release of currently safeguarded employment sites where these sites are surplus.</p> <p>B. Allowing the release of currently safeguarded employment sites regardless of whether they are surplus (which will have implications for Issue 6 below)</p> <p>C. Promoting redevelopment on certain housing estates that require modernisation.</p> <p>D. Allow more intensive mixed development schemes on commercial sites if these include housing.</p> <p>E. Accept higher densities for housing in town centres and other locations with high public transport accessibility.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	All of the options would have an uncertain effect on crime levels and fear of crime as planning's influence on crime levels mostly depends on the design of new development. Secure by design is part of London Planning Policy and will be followed for all housing developments and it is important that this extends to the public realm surrounding new development. There will be particular safety issues to address if developments are high density or include tall buildings (most likely with Options D and E). The provision of community facilities is also vital in order to build community relations and not foster a fear of crime. Option C would make the greatest contribution to reducing existing levels of fear of crime as it provides opportunities to rectify design problems on existing estates which may be contributing to fear of crime.
2. Health and well being. Promoting a healthy borough with better health care services and reduced health inequalities, and by reducing the causes of ill health.	Health inequalities are increasing across London rather than decreasing. Each of the options could have an effect on health inequalities, healthy neighbourhoods and access to health care. The main effect is likely to come from the ability of the planning system to ensure that adequate health care is available for everyone and this access to health care (and other services) is going to be vital in deciding where to locate housing development. All options have the potential to score positively if adequate health care facilities are provided. However, Options A, B and D pose a particular risk in this regard as sites allocated for employment are unlikely to be located near to adequate health care services.
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.	As with health care, the main effect is likely to come from the ability of the planning system to ensure that adequate services are available for everyone and this access to services is going to be vital in deciding where to locate housing development. All options have the potential to score positively if adequate public services are provided. However, Options A, B and D pose a particular risk in this regard as sites allocated for employment are unlikely to be located near to some of the services that people need to be able to access near their homes, such as schools, health care services etc. Consultees have highlighted a lack of certain types of infrastructure in certain places (i.e. Waterloo needs open space, West Norwood needs new family facilities) and this should be dealt with if possible through the policy.
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option C would contribute most to ensuring equitable outcomes for all communities (and this is the option supported by the majority of consultees). Particular issues for Lambeth include unemployment, literacy, homelessness and gender inequalities. All of the options would need to include a high level of affordable housing, and Option E may provide higher benefits in terms of accessibility to public transport.

<b>Issue 1 - Identifying additional opportunities for the development of new homes.</b>	
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	All of the options must include a high level of affordable housing. Option C would contribute most to the protection/restoration of local amenity, and Options A, B, D and E should include public realm, to create a sense of place.
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	Option C would contribute most to promoting social cohesion and sustainable lifestyles within existing communities. Option E is also sustainable in that it provides for high accessibility of public transport. However, attention should be given to design quality and improving the public realm to ensure safe and liveable communities. Options A, B and D should include provisions for public realm and the promotion of social cohesion.
<b>ENVIRONMENTAL</b>	
7. 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.	Option E should include reference to the protection of the built and historic environment, including the protection of key views. Options A, B and D should include provision for integration of new housing developments into the existing townscape, and the protection of open space.
8. 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.	Lambeth is a borough where large groups of people find it hard to get to work and great importance is attached to bus and Underground Services. Therefore, all of the Options should integrate public transport availability into their design. Option E is likely to be most positive because Higher density development if coupled with improved local services and facilities is closely linked to travel mode.
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	Access to green space is limited in certain areas of the Borough, most notably in the north. Access to green space should be considered for all new dwellings regardless of size and improvements made where necessary. All of the options will be either able to incorporate gardens or areas of green space. This will be important to contribute to the protection of stag beetle populations and provide habitats for the dwindling bat and House sparrow populations in Lambeth. All of the Options should only be considered where there is no impact on Lambeth's 64 officially designated 'parks and public green spaces'. Another important issue in Lambeth is linkages between acid grassland sites. All three major sites in Lambeth (Eardley Road Sidings, Peabody Hill and Streatham Common) are isolated from each other with no green connections between them. If possible, actions should be included in the LDF to increase these connections.

<b>Issue 1 - Identifying additional opportunities for the development of new homes.</b>	
10. 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.	Energy use in homes is the largest source of CO <sub>2</sub> in London so it is important to take action to reduce residential emissions. All of the Options under consideration should have regard to the targets contained in the Mayor of London's Energy Strategy, for example, concerning energy efficiency in new dwellings and incorporation of renewable energy generating technologies.
11. 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.	The northern parts of Lambeth, in the vicinity of the River Thames, lie within Flood Zone 3, as designated by the Environment Agency, due to risk of tidal flooding. Therefore, consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth. The effects of a changing climate and reductions in river flow are likely to make water supply a vital issue for any new development. Both options have the potential to score positively especially given the London Plan target of 105 litres pppd and the Code for Sustainable Homes standards becoming mandatory.
12. 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.	All new housing should contain dedicated storage space for separating waste for recycling, and should be provided with shared recycling facilities and kerb-collection services.
13. Air quality. To improve air quality.	Road traffic is the primary cause of air pollution in Lambeth, and reducing the need to travel, in conjunction with good public transport links should be a priority in all new housing development.
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	As with health care, the main effect is likely to come from the ability of the planning system to ensure that adequate education services are available for everyone. All options have the potential to score positively if adequate public services are provided. However, Options A, B and D pose a particular risk in this regard as sites allocated for employment are unlikely to be located near to education services.
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	Option B should have negative effects on the economy of Lambeth if much needed employment land is used for housing.
16. 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.	Options C and E would support this SA objective by both promoting regeneration and efficient use of land. Parts of Lambeth, such as Brixton, particularly require regeneration. Consideration should be given to efficient use of land for Options A, B and D.

<b>Issue 1 - Identifying additional opportunities for the development of new homes.</b>	
17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.	See above
<p><b>Conclusions:</b> Overall, Options C and E are the most sustainable, although consideration should be given to enhancing and maintaining the public realm in order to increase safety and reduce the fear of crime. Options A, B and D should be carefully planned, with consideration given to public transport links and access to employment opportunities.</p> <p><b>Uncertainties:</b> None</p> <p><b>Recommendations/Mitigation</b></p> <ul style="list-style-type: none"> <li>• Consultees have highlighted a lack of certain types of infrastructure in certain places (i.e. Waterloo needs open space, West Norwood needs new family facilities) and this should be dealt with if possible through the policy.</li> <li>• All of the options should include provisions for public realm and the promotion of social cohesion.</li> <li>• All of the Options should integrate public transport availability into their design.</li> <li>• An issue in Lambeth is linkages between acid grassland sites. All three major sites in Lambeth (Eardley Road Sidings, Peabody Hill and Streatham Common) are isolated from each other with no green connections between them. If possible, actions should be included in the LDF to increase these connections.</li> </ul>	

<b>Issue 2 –Achieving the right mix of affordable and market-priced housing</b>	
<p>A. Apply the London Plan threshold and percentages consistently in every part of the borough.</p> <p>B. Vary the locations in which we apply the London Plan threshold and percentages in relation to the level of affordable housing already in each neighbourhood. This could facilitate the introduction of more market-priced housing through housing estate regeneration, and the introduction of a higher proportion of affordable housing in parts of the borough where there is little there at the moment.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	Both options would have an uncertain effect on crime levels and fear of crime as planning's influence on crime levels mostly depends on the design of new development (and Lambeth has also seen a large decrease in crime over the last few years). It is vital that if affordable housing is being built as part of a development the design quality should be the same as the market housing in order to foster community cohesion. Secure by design is part of London Planning Policy and will be followed for all housing developments and it is important that this extends to the public realm surrounding new development. The provision of community facilities is also vital in order to build community relations and not foster a fear of crime that consultees have highlighted could occur when bringing affordable housing into proximity to market housing. This is addressed in other parts of the assessment.
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.	Health inequalities are increasing across London rather than decreasing and the options could have impacts on the development of healthy neighbourhoods and access to health services. Both options are likely to lead to a wider choice as to where people with affordable housing needs can live and would provide more mixed communities generally. A flexible approach (Option B) is more likely to take into account the need for services (including healthcare services). It is important that Option B is based on needs of individual areas and does not just seek to try and equalise the proportions of affordable housing in each area of the Borough. It should be based on needs and access to vital services, especially as there is a particular affordability issue for the elderly, people with disabilities (physical and learning) and people with mental health issues.
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.	A flexible, need based approach (Option B) is more likely to take into account the need for services. It is important that Option B is based on needs of individual areas and does not just seek to try and equalise the proportions of affordable housing in each area of the Borough.
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option A is a rigid approach and would not necessarily take into account the needs of different groups in the community. A more flexible needs based approach is needed to ensure that communities can stay together where they desire to (see below).
5. Housing. Ensuring everyone has the	There is a shortfall of affordable housing in Lambeth generally and consultees also claim an unmet need for

<b>Issue 2 –Achieving the right mix of affordable and market-priced housing</b>	
opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	families, the elderly, people with disabilities (physical and learning) and people with mental health issues. Option A and B could be equally as successful in providing numbers of affordable homes. However, both approaches could lead over time to similar levels of affordable housing in every area of the Borough (depending on how option B is implemented– it appears to be advocating an equalisation in proportions of affordable housing in the different areas in the Borough). This is positive in that it would give people a wider choice as to where they can live and would provide more mixed communities generally. However, it does not necessarily address the concern of Lambeth residents that there are particular shortfalls of affordable housing in particular areas (and these might be areas that already have high levels of affordable housing). Some consultees felt that it is best to focus social housing in existing areas to allow family groups to stay within the same locality. Therefore, a flexible approach is needed (Option B) but one that does not seek to equalise the proportions of affordable houses across the different areas of the Borough if this is not the correct approach. This needs to be based more on needs and levels of services available.
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	Bringing together different types of housing in an area can be positive as long as community facilities are adequate and the design and quality of affordable housing is as good as the market housing. These criteria can be achieved under both options.
<b>ENVIRONMENTAL</b>	
7. 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.	Both options have the potential to score positively. The design quality of affordable homes should be as high as that required for market housing and best practice guidance and London policy guidance should be followed in this regard.
8. 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.	Both options have the potential to give people a wider choice in where they can live affordably in the Borough. This wider choice means they can potentially choose to live closer to where they work and closer to public transport facilities, thus reducing travel by private car. This is an important issue because traffic congestion is a major concern for residents.
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	Access to open space is a key issue when planning for all homes (including affordable homes) and this issue is built into London Planning Policy. Consultees have also highlighted the fact that open space is particularly important for certain groups likely to be living in affordable housing. People with mental health issues was raised as a key example. If a needs based approach is taken, access to open space should be a consideration.

<b>Issue 2 –Achieving the right mix of affordable and market-priced housing</b>	
10. 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.	Energy use in homes is the largest source of CO <sub>2</sub> in London so it is important to take action to reduce residential emissions. Both options have the potential to score positively if sustainable design measures are implemented. The design quality and sustainability of affordable homes should be as high as that required for market housing and best practice guidance and London policy guidance should be followed in this regard.
11. 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.	The northern parts of Lambeth, in the vicinity of the River Thames, lie within Flood Zone 3, as designated by the Environment Agency, due to risk of tidal flooding. Therefore, consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth. The effects of a changing climate and reductions in river flow are likely to make water supply a vital issue for any new development. Both options have the potential to score positively especially given the London Plan target of 105 litres pppd and the Code for Sustainable Homes standards becoming mandatory.
12. 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.	All new housing should contain dedicated storage space for separating waste for recycling, and should be provided with shared recycling facilities and kerb-collection services.
13. Air quality. To improve air quality.	Both options have the potential to give people a wider choice in where they can live affordably in the Borough. This wider choice means they can potentially choose to live closer to where they work and closer to public transport facilities, thus reducing travel by private car and potentially, air quality. This is important because the Borough suffers from high levels of PM <sub>10</sub> and NO <sub>2</sub> and the whole of the Borough has been declared an AQMA specifically due to NO <sub>2</sub> .
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	The main impact will be access to education services and it will be important that education services are available to service all new housing (including affordable housing). If a needs based approach is taken, access to education services should be a consideration.
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	NA



<b>Issue 2 –Achieving the right mix of affordable and market-priced housing</b>	
16. 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.	It will be important that the public realm for affordable housing schemes is of a high quality. Both options have the potential to score positively.
17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.	NA
<p><b>Conclusions:</b>  Option A and B could be equally as successful in providing <u>numbers</u> of affordable homes. However, both approaches could lead over time to similar levels of affordable housing in every area of the Borough (depending on how option B is implemented – it appears to be advocating an equalisation in proportions of affordable housing in the different areas in the Borough). This is positive in that it would give people a wider choice as to where they can live and would provide more mixed communities generally. However, it does not necessarily address the concern of Lambeth residents that there are particular shortfalls of affordable housing in particular areas (and these might be areas that already have high levels of affordable housing). Some consultees felt that it is best to focus social housing in existing areas to allow family groups to stay within the same locality. Therefore, a flexible approach is needed (Option B) but one that does not seek to equalise the proportions of affordable houses across the different areas of the Borough if that is not the right approach. This needs to be based more on needs and levels of services available. The sustainability performance of each of the options is broadly similar and is dependent on how other (particularly development control) policies are developed in the plan.</p> <p><b>Uncertainties:</b>  How Option B will be implemented and how needs of different communities (and community facilities required) will be integrated into the approach.</p> <p><b>Recommendations/Mitigation:</b></p> <ul style="list-style-type: none"> <li>• Clarification of how option B will be implemented. If this flexible approach is taken forward, it needs to be based on needs and levels of services available. Developers should be required to undertake this research to ensure that needs are met and the facilities are available to service all housing.</li> <li>• The provision of community facilities is vital in order to build community relations and not foster a fear of crime that consultees have highlighted could occur when bringing affordable housing into proximity to market housing. This importance of facilities in fostering cohesion is very prominent in consultees' responses in Lambeth.</li> <li>• It is vital that if affordable housing is being built as part of a development the design and quality should be the same as the market housing in order to foster community cohesion. Best practice guidance and London policy guidance should be followed in this regard.</li> </ul>	

<b>Issue 3 – Achieving a mix of dwelling sizes to meet housing need (e.g. mix of one and two bedroom flats and larger family homes)</b>	
<p>A. Encourage a mix of dwellings in every new major housing development but not be prescriptive about the proportions of each size.</p> <p>B. Prescribe proportions of each dwelling size for every major housing development irrespective of location in the borough.</p> <p>C. Identify any shortfalls in the supply of dwellings of particular sizes in each local neighbourhood, and require a proportion of all future residential development in that area to contribute to meeting this shortfall.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
<p>1. Crime and safety. Ensuring safe communities with reduced crime and disorder.</p>	<p>Consultees were divided in their opinion of what dwelling sizes are most needed in Lambeth to make up shortfalls. Some believe that larger, family sized accommodation, particularly in the social sector, is most needed in Lambeth. However, there is a tension between this and the fact that similar numbers of respondents (especially in particular areas such as Steatham) also support the building of smaller homes as a means to deliver additional housing. This highlights that a tailored approach is needed for each area in Lambeth, something supported by consultees.</p> <p>All of the options would have an uncertain effect on crime levels and fear of crime as planning's influence on crime levels mostly depends on the design of new development (and Lambeth has also seen a large decrease in crime over the last few years). It is vital that if all development should have a good design quality in order to foster community cohesion. Secure by design is part of London Planning Policy and will be followed for all housing developments and it is important that this extends to the public realm surrounding new development. The provision of community facilities is also vital in order to build community relations.</p>
<p>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.</p>	<p>Health inequalities are increasing across London rather than decreasing. Each of the options could have an effect on health inequalities, healthy neighbourhoods and access to health care.</p> <p>Option C is most likely to be successful in achieving a mix of dwelling sizes that respond to particular shortfalls. This, in turn could be more successful than the other options in creating mixed neighbourhoods (one aspect of healthy neighbourhoods). One issue that people are concerned about is the amount of "churn" in the housing stock and they feel that flat conversions contribute to this. Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing. Ease of access to healthcare facilities should be considered for all of the options and the type of healthcare needed to support the types of communities planned. If access to healthcare is not considered, each of the options could have effects on health inequalities especially if family homes are built in areas with poor access to health care.</p>
<p>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.</p>	<p>Access to shops and services should be considered for all new developments and improvements made where necessary. In some areas, a proportion of all dwellings should be designed for elderly and/or disabled residents. This should be highlighted through the assessment of need in Option C. The plan needs to be clearer how need will be established if Option C is taken forward.</p>

<b>Issue 3 – Achieving a mix of dwelling sizes to meet housing need (e.g. mix of one and two bedroom flats and larger family homes)</b>	
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	The encouragement of a mix of dwelling sizes will promote equality and diversity and should contribute to promoting social cohesion and integration. Option C is most likely to be successful in achieving a mix of dwelling sizes that respond to particular shortfalls and therefore, promoting social cohesion.
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	All of the options can help to provide good, affordable housing. However, out of the three options, option C is most likely to be better at identifying and resolving particular shortfalls. Option A may lead to a mix but possibly not enough to solve particular shortfalls and option B may lead to an oversupply of certain types of development in certain areas and an undersupply in others.
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	Achieving a mix of dwellings would promote liveability and place. As identified Option C is most likely to do this.
<b>ENVIRONMENTAL</b>	
7. 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.	All have the potential to score positively. All new housing development should seek to improve the character of the built environment, and where appropriate conserve the historic environment. Design should be of high quality and should improve the attractiveness of the area. Policies should refer to sympathetic design in context with the historic townscape, use of appropriate materials, street pattern, facades, detailing etc.
8. 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.	Achieving a mix of dwelling types in all locations in the borough is the optimum condition from a transport planning perspective, and therefore, addressing identified shortfalls in the supply of dwellings of a particular type would be the best option for transport planning. Option A would score most positively here.
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	Access to green space is limited in certain areas of the Borough, most notably in the north (where there is a shortfall in smaller households). Access to green space should be considered for all new dwellings regardless of size and improvements made where necessary.

<b>Issue 3 – Achieving a mix of dwelling sizes to meet housing need (e.g. mix of one and two bedroom flats and larger family homes)</b>	
10. 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.	Energy use in homes is the largest source of CO <sub>2</sub> in London so it is important to take action to reduce residential emissions. All of the Options under consideration should have regard to the targets contained in the Mayor of London's Energy Strategy, for example, concerning energy efficiency in new dwellings and incorporation of renewable energy generating technologies.
11. 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.	The northern parts of Lambeth, in the vicinity of the River Thames, lie within Flood Zone 3, as designated by the Environment Agency, due to risk of tidal flooding. Therefore, consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth. The effects of a changing climate and reductions in river flow are likely to make water supply a vital issue for any new development. Both options have the potential to score positively especially given the London Plan target of 105 litres pppd and the Code for Sustainable Homes standards becoming mandatory.
12. 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.	All new housing should contain dedicated storage space for separating waste for recycling, and should be provided with shared recycling facilities and kerb-collection services.
13. Air quality. To improve air quality.	Achieving a mix of dwelling types in all locations in the borough is the optimum condition from a transport planning perspective, and therefore, addressing identified shortfalls in the supply of dwellings of a particular type would be the best option for transport planning. Option A would score most positively here and should have positive impacts on air quality. This is important because the Borough suffers from high levels of PM <sub>10</sub> and NO <sub>2</sub> and the whole of the Borough has been declared an AQMA specifically due to NO <sub>2</sub> .
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	The main impact will be access to education services and it will be important that education services are available to service all new housing (regardless of size).
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	NA

<b>Issue 3 – Achieving a mix of dwelling sizes to meet housing need (e.g. mix of one and two bedroom flats and larger family homes)</b>	
16. 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.	Achieving a mix of housing sizes should help with regeneration as people will not have to move out of certain areas because of a lack of housing of an appropriate size. This risks certain areas becoming mainly flats and some areas becoming family housing areas.
17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.	NA
<p><b>Conclusions</b></p> <p>The achievement of a mix of dwelling sizes contributes to mixed communities ensuring greater diversity of residents. This has a number of benefits. However, out of the three options, option C is most likely to lead to a true mix of residents because it is likely to be better at identifying and resolving particular shortfalls. Option A may lead to a mix but possibly not enough to solve particular shortfalls and option B may lead to an oversupply of certain types of development in certain areas and an undersupply in others. The sustainability performance of each of the options is broadly similar and is dependent on how other (particularly development control) policies are developed in the plan.</p> <p><b>Uncertainties</b></p> <p>How need will be established if Option C is taken forward.</p> <p><b>Recommendations/Mitigation</b></p> <ul style="list-style-type: none"> <li>• Ease of access to healthcare facilities should be considered for all of the options and the type of healthcare needed to support the types of communities planned.</li> <li>• Access to green space should be considered for all new dwellings regardless of size and improvements made where necessary.</li> <li>• One issue that people are concerned about is the amount of “churn” in the housing stock and they feel that flat conversions contribute to this. Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing.</li> <li>• Access to shops and services should be considered for all new dwelling sizes and improvements made where necessary. In some areas, a proportion of all dwellings should be designed for elderly and/or disabled residents.</li> <li>• The energy efficiency of housing is not considered in the policy (and generally in the issues and options paper). Policies need to be developed on renewable energy, energy efficiency and sustainable design.</li> </ul>	

<b>Issue 4 – Deciding the right level of density for new residential development</b>	
<p>A. Broadly reflect the existing level of residential density in the area (i.e. relatively low densities in low density areas and high densities in high density areas).</p> <p>B. Direct high density residential development away from existing high density areas and towards lower density areas with good public transport provision.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	High density development can cause issues in terms of crime and fear of crime depending on how it is designed and implemented. If either of the options are taken forward it will be vital that all development should have a good design quality in order to foster community cohesion. Secure by design is part of London Planning Policy and will be followed for all housing developments and it is important that this extends to the public realm surrounding new development. The provision of community facilities is also vital in order to build community relations.
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.	Health inequalities are increasing across London rather than decreasing and there is a general consensus amongst consultees that Lambeth is already a densely populated borough and many people find it hard to think about how increased population growth could be accommodated. Each of the options could have an effect on health inequalities, healthy neighbourhoods and access to health care. The main effect is likely to come from the ability of the planning system to ensure that adequate health care is available for everyone and this access to health care (and other services) is going to be vital in deciding where to locate high density development. Both options have the potential to score positively if adequate health care facilities are provided. Access to open space and recreational facilities will also need to be ensured. However, there is more of a risk with Option A that needed facilities are over-subscribed in already high density areas.
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.	As with health care, the main effect is likely to come from the ability of the planning system to ensure that adequate services are available for everyone and this access to services is going to be vital in deciding where to locate high density development. Both options have the potential to score positively if adequate services are provided. However, there is more of a risk with Option A that needed facilities are over-subscribed in already high density areas. There is most support among the consultation respondents for directing high density residential development away from existing high density areas and towards lower density areas with good public transport provision (Option B). This is a sustainable option as long as adequate services can be provided.
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option B is more likely to promote diversity in neighbourhoods. However, the level of services provided with development is more likely to determine the effects on social exclusion.
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent	All of the options can help to provide good, affordable housing.

<b>Issue 4 – Deciding the right level of density for new residential development</b>	
home, quiet enjoyment of that home and the protection of local amenity.	
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	Achieving a mix of dwellings would promote liveability and place. As identified Option B is most likely to do this and seems to have support from the majority of consultation respondents. Some consultees also felt that high density housing should be provided through regeneration of existing unoccupied and run down buildings and this should be prioritised wherever possible as a good use of land.
<b>ENVIRONMENTAL</b>	
7. 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.	Both options have the potential to score positively. All new housing development should seek to improve the character of the built environment, and where appropriate conserve the historic environment. Design should be of high quality and should improve the attractiveness of the area. Policies should refer to sympathetic design in context with the historic townscape, use of appropriate materials, street pattern, facades, detailing etc.
8. 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.	Higher density development if coupled with improved local services and facilities is closely linked to travel mode and Option B has the potential to score positively as it locates high density development in areas with good public transport provision. The effect of Option A is more uncertain as it depends on the access to public transport in the particular areas where development is taking place. If Option A is taken forward access to public transport should be a factor in deciding where to locate development.
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	Access to green space is limited in certain areas of the Borough, most notably in the north. Access to green space should be considered for all new dwellings regardless of size and improvements made where necessary. Certain design features can be integrated in high density development that can assist biodiversity including green roofs. Green areas and landscaping in high density developments is also more likely to be in the public realm, therefore, there are more opportunities to integrate biodiversity measures. Policies should be put in place to encourage biodiversity enhancement.
10. 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.	Energy use in homes is the largest source of CO <sub>2</sub> in London so it is important to take action to reduce residential emissions. All of the Options under consideration should have regard to the targets contained in the Mayor of London's Energy Strategy, for example, concerning energy efficiency in new dwellings and incorporation of renewable energy generating technologies.

<b>Issue 4 – Deciding the right level of density for new residential development</b>	
11. 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.	The northern parts of Lambeth, in the vicinity of the River Thames, lie within Flood Zone 3, as designated by the Environment Agency, due to risk of tidal flooding. Therefore, consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth. The effects of a changing climate and reductions in river flow are likely to make water supply a vital issue for any new development. Both options have the potential to score positively especially given the London Plan target of 105 litres pppd and the Code for Sustainable Homes standards becoming mandatory.
12. 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.	All new housing should contain dedicated storage space for separating waste for recycling, and should be provided with shared recycling facilities and kerb-collection services.
13. Air quality. To improve air quality.	Option B has the potential to score positively as it locates high density development in areas with good public transport provision, thus, potentially reducing air pollution from car use. The effect of Option A is more uncertain as it depends on the access to public transport in the particular areas where development is taking place. If Option A is taken forward access to public transport should be a factor in deciding where to locate development.
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	The main impact will be access to education services and it will be important that education services are available to service all new housing.
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	NA
16. 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.	High density development will give an efficient use of land, especially if developed on previously developed sites. Some consultees also felt that high density housing should be provided through regeneration of existing unoccupied and run down buildings and this should be prioritised wherever possible as a good use of land.



<b>Issue 4 – Deciding the right level of density for new residential development</b>	
<p>17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.</p>	<p>NA</p>
<p><b>Conclusions</b>  The main impact of both of the options is likely to depend on the ability of the planning system to ensure that adequate services are available for everyone and this access to services is going to be vital in deciding where to locate high density development. This could be achieved in both options. However, there is more of a risk with Option A that needed facilities are over-subscribed in already high density areas. It will also be important for housing to be near to public transport links. Option B explicitly states this but the effect of Option A is more uncertain as it depends on the access to public transport in the particular areas where development is taking place. If Option A is taken forward access to public transport should be a factor in deciding where to locate development. There is a concern amongst consultees that Lambeth is already a densely populated borough. However, most consultees when given the option would prefer the council to direct high density residential development away from existing high density areas and towards lower density areas with good public transport provision (Option B). This is a sustainable option as long as adequate services can be provided. Some consultees also felt that high density housing should be provided through regeneration of existing unoccupied and run down buildings and this should be prioritised wherever possible as a good use of land. On balance, Option B is more popular with consultees and scores more positively in the appraisal.</p> <p><b>Uncertainties</b>  None.</p> <p><b>Recommendations/Mitigation</b></p> <ul style="list-style-type: none"> <li>• Both options have the potential to score positively if adequate services are provided and this should be a key factor in deciding where to locate high density development. If Option A is taken forward access to public transport should be a factor in deciding where to locate development.</li> <li>• Some consultees also felt that high density housing should be provided through regeneration of existing unoccupied and run down buildings and this should be prioritised (whichever option is chosen) wherever possible as a good use of land.</li> <li>• Certain design features can be integrated in high density development that can assist biodiversity including green roofs. Green areas and landscaping in high density developments is also more likely to be in the public realm, therefore, there are more opportunities to integrate biodiversity measures. Policies should be put in place to encourage biodiversity enhancement.</li> </ul>	

<b>Issue 5 - Where should we allow new conversions of houses into flats?</b>	
<p>A. Allow them anywhere in the borough, subject to an appropriate minimum floor area and meeting design requirements.</p> <p>B. Restrict conversions in areas which already have high levels of converted flats (as established through survey data).</p> <p>C. Allow conversions in areas where there is a specific housing need and according to the dwelling mix required in each residential neighbourhood.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
<p>1. Crime and safety. Ensuring safe communities with reduced crime and disorder.</p>	<p>Consultees' views about flat conversions are mixed. While some feel they should be allowed anywhere and others think they should be stopped in areas that already have a high proportion, the largest group thinks flat conversions should be allowed if there is a proven housing need for this sort of accommodation. All feel that sufficient infrastructure needs to be put in place to support flat conversions and many feel this is an area which currently needs to be addressed.</p> <p>All the options would have an uncertain effect on crime levels and fear of crime as planning's influence on crime levels mostly depends on the design of new development (and Lambeth has also seen a large decrease in crime over the last few years). It is vital that all development should have a good design quality in order to foster community cohesion. Secure by design is part of London Planning Policy and will be followed for all housing developments and it is important that this extends to the public realm surrounding new development. The provision of community facilities is also vital in order to build community relations. The provision of community facilities is also vital in order to build community relations and reduce fear of crime.</p>
<p>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.</p>	<p>Health inequalities are increasing across London rather than decreasing. The main concerns related to flat conversions are the lack of infrastructure available to service the increased number of people in the area (especially parking) and the fact that they can contribute to (especially with rented accommodation) "churn" in the housing stock. Both of these factors can contribute to an unhealthy and unsustainable housing environment. Option A could potentially have a negative effect on both these factors. Option B could have a positive effect in that it seeks not to overload a certain community with flat conversions. However, it will not be positive in addressing the very real housing shortfall in some areas that can only be solved by allowing flat conversions in some circumstances. Therefore, Option C is seen as the most positive option as it can address both factors. Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing and how much needed infrastructure will be provided.</p>
<p>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.</p>	<p>All consultee groups believe that more thought needs to be given to infrastructure to cope with the increased population if houses are going to be converted into flats and people are especially concerned about parking. Option B could potentially stop the overloading certain areas which already have high levels of converted flats. However, it does not recognise that flat conversions are a vital way in London to address housing shortfalls. Therefore, Option C is seen as the most positive option as it can address both factors. Whichever option is chosen, location of new housing should be assessed in terms of proximity to all services and infrastructure, including parking.</p>

<b>Issue 5 - Where should we allow new conversions of houses into flats?</b>	
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	The encouragement of a mix of dwelling sizes will promote equality and diversity and should contribute to promoting social cohesion and integration. Option C is most likely to be successful in achieving a mix of dwelling sizes that respond to particular shortfalls and therefore, promoting social cohesion. However, care must be taken that enough family housing is available in all areas where families want to live as there is a concern amongst consultees that flat conversions exclude families from living in particular areas.
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	See above comments related to the provision of family housing and provision of infrastructure.
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	Achieving a mix of dwellings would promote liveability and place. As identified Option C is most likely to do this but care must be taken to ensure that enough family housing is available in all areas where families want to live.
<b>ENVIRONMENTAL</b>	
7. 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.	All options have the potential to score positively. All new housing development should seek to improve the character of the built environment, and where appropriate conserve the historic environment. Design should be of high quality and should improve the attractiveness of the area. Policies should refer to sympathetic design in context with the historic townscape, use of appropriate materials, street pattern, facades, detailing etc. It is important that if Option A or C are progressed then issues such as parking are addressed as these can detract from valued townscape.
8. 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.	The main issue to do with flat conversions and travel is related to parking. It is important that if Option A or C are progressed then issues such as parking are addressed and considered in the decision where to allow flat conversions. All of the options could score positively in terms of public transport as long as the location of new housing is assessed in terms of proximity to all services and infrastructure, including public transport. This is an important issue because traffic congestion is a major concern for residents.
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	Access to green space is limited in certain areas of the Borough, most notably in the north (where there is a shortfall in smaller households). Access to green space should be considered for all new dwellings (including flat conversions) regardless of size and improvements made where necessary. Another issue with flat conversions is the fact that changes in design of roof spaces for houses undergoing renovation can prevent access to the roof space for birds. This is an important issue as house sparrow levels have decreased in London by 70% from 1994-2002. Concreting over gardens to provide parking might also reduce habitats available for birds. Some mitigation will be needed to reduce this as the policy is developed.

<b>Issue 5 - Where should we allow new conversions of houses into flats?</b>	
10. 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.	Energy use in homes is the largest source of CO <sub>2</sub> in London so it is important to take action to reduce residential emissions. All of the Options under consideration should have regard to the targets contained in the Mayor of London's Energy Strategy, for example, concerning energy efficiency in new dwellings and incorporation of renewable energy generating technologies.
11. 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.	The northern parts of Lambeth, in the vicinity of the River Thames, lie within Flood Zone 3, as designated by the Environment Agency, due to risk of tidal flooding. Therefore, consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth. The effects of a changing climate and reductions in river flow are likely to make water supply a vital issue for any new development. Both options have the potential to score positively especially given the London Plan target of 105 litres pppd and the Code for Sustainable Homes standards becoming mandatory.
12. 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.	All new housing should contain dedicated storage space for separating waste for recycling, and should be provided with shared recycling facilities and kerb-collection services.
13. Air quality. To improve air quality.	All of the options could score positively in terms of public transport as long as the location of new housing is assessed in terms of proximity to all services and infrastructure, including public transport. Therefore, all could score positively in terms of air quality. This is important because the Borough suffers from high levels of PM <sub>10</sub> and NO <sub>2</sub> and the whole of the Borough has been declared an AQMA specifically due to NO <sub>2</sub> .
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	The main impact will be access to education services and it will be important that education services are available to service all new housing (regardless of size).
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	NA

<b>Issue 5 - Where should we allow new conversions of houses into flats?</b>	
16. 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.	Planning for flat conversions in areas of need should help with regeneration as people will not have to move out of certain areas because of a lack of housing of an appropriate size. However, this needs to be balanced with the concern about family sized homes expressed above.
17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.	NA

## **Issue 5 - Where should we allow new conversions of houses into flats?**

### ***Conclusions***

Consultees' views about flat conversions are mixed. While some feel they should be allowed anywhere and others think they should be stopped in areas that already have a high proportion, the largest group thinks flat conversions should be allowed if there is a proven housing need for this sort of accommodation. The main concerns related to flat conversions are the lack of infrastructure available to service the increased number of people in the area (especially parking) and the fact that they can contribute to (especially with rented accommodation) "churn" in the housing stock. Both of these factors can contribute to an unhealthy and unsustainable housing environment. Option A could potentially have a negative effect on both these factors. Option B could have a positive effect in that it seeks not to overload a certain community with flat conversions. However, it will not be positive in addressing the very real housing shortfall in some areas that can only be solved by allowing flat conversions in some circumstances. Therefore, Option C is seen as the most positive option as it can address both factors. Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing and how much needed infrastructure will be provided. The sustainability performance of each of the options is broadly similar and is dependent on how other (particularly development control) policies are developed in the plan.

### ***Uncertainties***

None.

### ***Recommendations/Mitigation***

- Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing and how much needed infrastructure will be provided.
- It is important that if Option A or C are progressed then issues such as parking are addressed as these can detract from valued townscape.
- Access to green space should be considered for all new dwellings regardless of size and improvements made where necessary.
- The energy efficiency of housing is not considered in the policy (and generally in the issues and options paper). Policies need to be developed on renewable energy, energy efficiency and sustainable design.
- Another issue with flat conversions is the fact that changes in design of roof spaces for houses undergoing renovation can prevent access to the roof space for birds. This is an important issue as house sparrow levels have decreased in London by 70% from 1994-2002. Concreting over gardens to provide parking might also reduce habitats available for birds. Some mitigation will be needed to reduce this as the policy is developed.

<b>Issue 6 – Increasing the number and variety of jobs in the borough</b>	
<p>A. Identify the broad locations appropriate for commercial development, without being specific about which economic sectors will be encouraged.</p> <p>B. Identify the broad locations appropriate for commercial development and specify the key economic sectors to be encouraged within the borough.</p> <p>C. Same as A, but also introduce a requirement to include different types of commercial space in developments.</p> <p>D. Same as B, but also introduce a requirement to include different types of commercial space in developments.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	There is likely to be little difference between the options in relation to crime and safety.
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.	Options C and D could be said to be slightly better for health in terms of providing a better range of commercial premises (and therefore employment prospects). Access to employment is a key determinant of 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.	There is likely to be little difference between the options in relation to access and services.
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Options C and D may provide more opportunity as they aim to provide a range of commercial space within developments. This would support small businesses (many of whom may be owned or run by equality target groups like minority ethnic groups) and local entrepreneurs.
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	N/A
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	N/A
<b>ENVIRONMENTAL</b>	

<b>Issue 6 – Increasing the number and variety of jobs in the borough</b>	
7. 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.	N/A
8. 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.	Uncertain if there would be a difference between the options. It is possible that option B could score more positively in terms of sustainable transport as it may mean that the Council has more influence on the type of commercial organisations coming into the borough and may mean it can make choices about those that support more sustainable transport modes? For example, it could favour financial and business services (possibly more sustainable in terms of transport) over manufacturing or waste management (less sustainable?).
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	N/A
10. 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.	Again, if option B implies that the Council has more say in which employers it attracts into Lambeth, then it could contribute to this objective by prioritising more sustainable, energy efficient organisations and operations.
11. 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.	The same logic as applies to objective 10 above also applies to water issues.
12. 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.	<p>The same logic as applies to objective 10 above also applies to waste issues. Given that the Council see the green economy and the waste management sector in particular as key growth sector in Lambeth (and in view of the London Plan apportionment), it is inevitable that new waste management facilities will be developed in the Borough.</p> <p>Applying the 4 options to new waste management facilities should be subject to separate public consultation. Providing local residents with a degree of certainty about the type of waste facility to be developed in their area could be beneficial and desirable.</p>



<b>Issue 6 – Increasing the number and variety of jobs in the borough</b>	
13. Air quality. To improve air quality.	Unlikely that any commercial development permitted in Lambeth would contribute to poor air quality, other than through transport patterns (see 8 above) which may favour option B.
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	In terms of improving skills, it could be argued that options C and D may be more beneficial given that they specify a range of commercial premises which could offer more opportunity for training.
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	<p>All options will contribute by bringing employment opportunities into the borough and increasing the number of jobs. There is no difference between the 4 options in terms of ensuring that employment is provided in the right locations.</p> <p>In terms of promoting variety of employment (which is important in maintaining a sustainable economy), options B and D are more favourable.</p> <p>Options B and D have the advantage of allowing the Borough to better plan for employment in relation to known growth sectors (in the wider London economy). Known key growth sectors are: the public sector; the knowledge economy (including creative, cultural, business and financial services sectors); the hospitality, leisure, travel and tourism sector; retail; and the green economy. These have the added advantage of being specifically supported by policies in the London Plan (and the London Development Agency’s Economic Development Strategy and funding schemes).</p> <p>Some of these key sectors have specific requirements (e.g. creative sector) and better planning and co-ordination is likely to produce better results.</p> <p>The variety of commercial premises required for many of these growth sectors will mean that option D may be most favourable, as it requires a range of commercial units (in terms of size and affordability) to be provided.</p> <p>In terms of improving the social and environmental performance of businesses, options B and D score highest as they may offer the Council more control over which employers locate in the borough (and will target the green economy in particular).</p>
16. 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.	Likely to be no difference between the options in relation to this objective.

<b>Issue 6 – Increasing the number and variety of jobs in the borough</b>	
<p>17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.</p>	<p>In terms of increasing the amount of employment generating activities, it could be argued that option A may score the best, given it provides the least hindrance to a potential employer locating in the borough. This appears to be the option favoured by landowners/ developers.</p> <p>However, given that option B targets known growth sectors (and implies better co-ordination), it could equally be argued that this option is more likely to deliver employment, through specifically identifying and meeting the needs of the sectors involved. These have the added advantage of being specifically supported by policies in the London Plan (and the London Development Agency’s Economic Development Strategy and funding schemes).</p> <p>In terms of increasing access to employment and offering everyone the opportunity for rewarding, well-located and satisfying employment, options B and D may be more favourable given the fact that they should promote a greater variety of employment (and premises).</p> <p>Option D would offer more opportunities to SMEs and the self employed. Lambeth is below the national average for self employment and levels of self employment are even less in the BME community.</p>

## **Issue 6 – Increasing the number and variety of jobs in the borough**

### ***Conclusions***

The consultation response showed that the majority of community group representatives considered that economic growth should focus on local opportunities for local people via small scale, niche jobs in the arts, retail, cultural and hospitality sectors. However, representatives from larger organisations thought that local employment can be achieved through large and even multi-national businesses. All groups agreed that it is of paramount importance to safeguard existing employment space as far as this is possible and that the development of business premises should be flexibly determined by local need.

Options B and D score more favourably from a sustainability perspective given that:

- They are more likely to deliver the type and variety of employment that the Borough wants to attract;
- The Council may have more of an influence over the sectors involved and could influence the wider environmental and social sustainability of future employers.

Key growth sectors (options B and D) have the added advantage of being specifically supported by policies in the London Plan (and the London Development Agency's Economic Development Strategy and funding schemes).

Option D would perhaps be the most favourable given that it would provide a range of commercial premises (in terms of size and affordability) and so help to foster the smaller companies (e.g. SME and self employed) as well as the larger companies. This would provide improved social benefits, especially to equalities (helping equality target groups) and health (access to employment a key determinant of health). This would appear to best meet the consultation view.

### ***Uncertainties***

None

### ***Recommendations/Mitigation***

Broad locations identified for commercial development should be well served by public transport, cycling and walking. They should serve to meet the needs of Areas for Regeneration identified in the London Plan.

<b>Issue 7 - Achieving an adequate supply of affordable business premises</b>	
<p>A. Encourage new affordable business premises but not be prescriptive about the type, size, location and cost.</p> <p>B. Require a proportion of affordable business premises in all new office and light industrial development (to be secured through a legal agreement).</p> <p>C. Same as B, but only in certain parts of the borough where demand for affordable premises is highest.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	<p>No major differences between the options.</p> <p>Delivering affordable business premises where they are most needed could contribute to reduced crime levels in the long terms in terms of increased local job opportunities.</p> <p>Provision of affordable business premises in all development (option B) could result in increased crime or fear of crime if these are left unoccupied.</p>
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.	<p>The provision and delivery of affordable business premises is likely to contribute to improved health (and reduced health inequalities) in terms of improving people's job prospects.</p> <p>Options B and C are more likely to deliver affordable business premises and therefore would score more highly.</p>
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.	N/A
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<p>The provision and delivery of affordable business premises is likely to contribute to improved equality outcomes in terms of improving people's job prospects.</p> <p>Options B and C are more likely to deliver affordable business premises and therefore would score more highly.</p>
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	N/A
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote	Provision of affordable business premises in all development (option B) could result in increased crime or fear of crime if these are left unoccupied. Therefore option B has the potential to contribute negatively to this objective.

<b>Issue 7 - Achieving an adequate supply of affordable business premises</b>	
long-term social cohesion, sustainable lifestyles and a sense of place.	
<b>ENVIRONMENTAL</b>	
7. 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.	No real impact, although the argument that option B presents a slight risk in terms of unoccupied premises could impact negatively on the character of the built environment.
8. 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.	Option C should score the highest in terms of reducing the need to travel and promoting sustainable modes of transport, as it targets affordable premises in areas of identified need.
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	N/A
10. 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.	Again, option B may present more of a risk if units are not occupied – in terms of ‘wasted’ embodied energy. Option A may also score negatively as it could result in premises being ‘retrofitted’ where affordable provision was not made available initially but required at a later date.  Targeting areas of need (option C) could allow more bespoke sustainable design measures including climate change adaptation. As it also reduces the need to travel (see objective 10) it would also reduce greenhouse gas emissions from transport.
11. 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.	For the reasons given in 10, above, it is likely to be more environmentally sustainable to target areas of need, in terms of making the most efficient use of resources.
12. 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.	For the reasons given in 10, above, it is likely to be more environmentally sustainable to target areas of need, in terms of making the most efficient use of resources.

<b>Issue 7 - Achieving an adequate supply of affordable business premises</b>	
13. Air quality. To improve air quality.	Option C should score the highest in terms of reducing the need to travel and promoting sustainable modes of transport, as it targets affordable premises in areas of identified need. It would therefore score highest in terms of improving air quality.
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	All 3 options could provide increased training opportunities in terms of increased provision of affordable premises, with option B scoring highest and option A lowest. Option C is likely to deliver in areas of greatest need.
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	<p>Option A would be less of an imposition on landowners/ developers and would have benefits in terms of delivering commercial schemes. However, the risk is that affordable units would not be created.</p> <p>Option B would have the most imposition on landowners and developers and could affect the delivery and viability of commercial schemes. However, it would increase the amount of affordable units in the borough and create opportunities for smaller businesses (e.g. SMEs and self employed).</p> <p>Option C would serve to deliver affordable units where they are most needed.</p>
16. 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.	Option C would score more favourably in terms of making efficient use of land and providing most benefit to those in need.
17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.	<p>Option A would be less of an imposition on landowners/ developers and would have benefits in terms of delivering commercial schemes. However, the risk is that affordable units would not be created.</p> <p>Option B would have the most imposition on landowners and developers and could affect the delivery and viability of commercial schemes. However, it would increase the amount of affordable units in the borough and create opportunities for smaller businesses (e.g. SMEs and self employed).</p> <p>Option C would serve to deliver affordable units where they are most needed.</p>

## **Issue 7 - Achieving an adequate supply of affordable business premises**

### **Conclusions**

Lambeth is among the most socially and economically deprived local authority districts in the country. The population is young and diverse, unemployment remains relatively high and nearly a fifth of all residents have no qualifications. Lambeth suffers from a high rate of economic inactivity (Lambeth's economically active population was 67.6% in comparison to a London figure of 74.3%<sup>3</sup>). It also suffers from high levels of need, with higher than average proportions of lone parents and BAME groups who have lower than average employment rates. Other factors within the London labour market include a high level of competition for jobs, putting young people, the lower-skilled and parents at an increasing disadvantage. There are also particular problems in London accessing affordable childcare.

Against this backdrop, Option A is unlikely to deliver the affordable units required by the Council.

Option B is likely to present risks in terms of unwanted and unused units (which could have negative crime and liveability impacts) and be a waste of scarce resources.

Option C would provide the most favourable sustainable option given that:

- It meets identified need;
- It would reduce the need to travel, reduce CO<sub>2</sub> emissions and is preferable from an air quality perspective;
- It makes the best use of scarce resources, including land and environmental resources.

### **Uncertainties**

None

### **Recommendations/Mitigation**

None

---

<sup>3</sup> Nomis web data for October 2005–September 2006

<b>Issue 8 – Increasing Lambeth’s sustainable waste management capacity</b>	
<p>A. Find as much land as possible to develop new facilities, which may involve the loss of other employment-generating uses.</p> <p>B. Integrate waste collection, treatment and disposal as far as possible within major new residential and commercial development, so that the overall land-take across the borough is minimised.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	NA
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.	<p>Waste management sites can have an effect on health through effects on air quality (through the movement of waste) and through noise and disturbance. However, PPS10 states that modern, appropriately located, well-run and well-regulated waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health.</p> <p>Option B could have more impact on issues like noise and amenity because sites are located nearer to residential areas. However, the nature of the facilities located on such sites are likely to be smaller and more “neighbourhood friendly” than larger sites. There is an uncertainty regarding the types of waste management technology that will be promoted on sites.</p>
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.	Accommodating waste management facilities in major new development (option B) will make facilities more accessible for people generally. However, there is likely to be a need for some new facilities (even if only for storage of waste). This is unlikely to be as radical as suggested by the phrase in Option A “finding as much land as possible”.
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	
5. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	NA
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable	Accommodating waste management facilities in major new development (option B) are likely to encourage people to pursue more sustainable lifestyles generally. However, there is likely to be a need for some new facilities (even if only for storage of waste). This is unlikely to be as radical as finding as much land as possible.



<b>Issue 8 – Increasing Lambeth’s sustainable waste management capacity</b>	
lifestyles and a sense of place.	
<b>ENVIRONMENTAL</b>	
7. 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.	Both of the options have the potential to have a negative impact on the attractiveness of the townscape. In some ways larger developments have the biggest potential to affect the townscape because of their size. However, they may be located in areas which are less sensitive and industrial in use already. Smaller facilities have less potential to affect townscape due to their size but are likely to be located in more sensitive residential locations. Sensitive design of facilities is key for both options and should be built into policy.
8. 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.	This is an important issue because traffic congestion is a major concern for residents. Both options have the potential to cause road traffic but Option B is more positive than Option A because the distance waste has to travel to be treated is less. Both options are likely to be positive in a way because the more treatment Lambeth can provide on its own waste, the less will need to be transported outside London to be land filled.
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	All waste management activities can have an affect on biodiversity due to direct land take and effects from disturbance. Smaller sites (Option B) are likely to have less impact than larger facilities (Option A). However, larger sites have more space within which they can integrate habitat mitigation. Habitat mitigation should be built into both options (but especially option A) where possible.
10. 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.	Waste management techniques can have impacts on climate emissions with techniques further up the hierarchy (recycling is the most positive, followed by composting and energy recovery and then land filling last). There is an uncertainty regarding the types of waste management technology that will be promoted on sites so the effects are not possible to judge.
11. 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.	All waste management facilities can potentially have impacts on the water environment through the release of leachate (landfill sites and compositing sites) or through the use and disposal of process / cooling water. However, with modern environmental controls effects should be minimal. There is an uncertainty regarding the types of waste management technology that will be promoted on sites so the effects are not possible to judge.

<b>Issue 8 – Increasing Lambeth’s sustainable waste management capacity</b>	
12. 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.	Managing waste sustainably in London will require significant infrastructure development as London is forced to deal with more and more of its own waste and reduce waste exports. The amount of waste produced in London has also increased. The Core Strategy needs to ensure that the appropriate infrastructure is in place within the borough to maximise recycling, composting and waste disposal at source, as well as for the effective operation of the waste collection service. This is likely to include a network of neighbourhood and community recycling centres, in addition to the existing household waste recycling centre and transfer station at the Vale Street Civic Amenity site. Therefore, a combination of both options is likely to be needed. Official consultation respondents think that integrating waste collection, treatment and disposal as far as possible within major new residential and commercial developments (supported by 20 respondents) is the best option for improving sustainable waste management. However, there is likely to be a need for some bigger sites even if only for storage.
13. Air quality. To improve air quality.	All waste management and disposal activities can cause an increase in traffic, dust, odour and pollution as waste is transported, sorted and treated. A particular issue relates to the effects of waste management facilities on AQMAs. Whilst the presence of an AQMA does not necessarily preclude the construction of a waste management facility the potential for the facility to negatively impact on the AQMA must be considered. However, it is felt that in general small local facilities (Option B) is likely to be more positive as the distance waste has to travel to be treated is less. However, the individual situation of each development will need to be considered in terms of traffic movements and sensitive receptors.
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	The development of a green industries sector will lead to new training and employment opportunities for Londoners and contribute to sustainable economic growth. Both options are likely to be positive but it is important that people with the right skills are trained especially with the move to new waste management technologies.
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	
16. 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.	Option B gives a more efficient use of land. Option A may take land from much needed employment uses. However, both options are likely to be needed so options need to be developed which minimise land take from new larger facilities.

<b>Issue 8 – Increasing Lambeth’s sustainable waste management capacity</b>	
17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.	See above.
<p><b>Conclusions</b>  Managing waste sustainably in London will require significant infrastructure development and the Core Strategy needs to ensure that the appropriate infrastructure is in place within the borough to maximise recycling, composting and waste disposal at source, as well as for the effective operation of the waste collection service. Official consultation respondents think that integrating waste collection, treatment and disposal as far as possible within major new residential and commercial developments is the best option for improving sustainable waste management. However, there is likely to be a need for some bigger sites even if only for storage. Therefore, a combination of both options is likely to be needed. All waste sites are likely to have some sustainability effects but the extent of these is dependent on the size of the sites and the particular waste management method used on site. Smaller neighbourhood facilities (Option B) could have more impact on issues like noise and amenity because sites are located nearer to residential areas. However, the nature of the facilities located on such sites are likely to be smaller and more “neighbourhood friendly” than larger sites. Smaller sites are also likely to reduce the distance waste travels to be treated, thus reducing greenhouse emissions. Larger sites may have more visual impact because of their size and HGV movements are also likely to be higher. However, because they are more likely to be located in industrial type areas, the impact may be less. In addition, larger facilities might have more space to build in mitigation (especially habitat mitigation). Both options are likely to be positive in terms of employment and skills as the development of a green industries sector will lead to new training and employment opportunities for Londoners and contribute to sustainable economic growth. Both options are likely to be positive but it is important that people with the right skills are trained especially with the move to new waste management technologies.</p> <p><b>Uncertainties</b>  There is an uncertainty regarding the types of waste management technology that will be promoted on sites so certain impacts cannot be fully assessed at this stage.</p> <p><b>Recommendations/Mitigation</b></p> <ul style="list-style-type: none"> <li>• Sensitive design of facilities is key for both options and should be built into policy.</li> <li>• Habitat mitigation should be built into both options (but especially option A) where possible.</li> <li>• Option B gives a more efficient use of land. Option A may take land from much needed employment uses. However, both options are likely to be needed so options need to be developed which minimise land take from new larger facilities.</li> <li>• Siting waste management facilities in an AQMA is likely to give rise to some air quality issues which will need to be addressed for each site.</li> </ul>	

<b>Issue 9 - Where should we locate tall buildings, subject to safeguarding protected views and World Heritage Sites?</b>	
<p>A. Allow them anywhere in the borough, subject to design, proximity to public transport and the individual circumstances of the site.</p> <p>B. Identify particular areas of the borough where they definitely should not be located.</p> <p>C. Identify areas of the borough where tall buildings should be particularly encouraged.</p>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	All the options would have an uncertain effect on crime levels and fear of crime as planning's influence on crime levels mostly depends on the design of new development. Secure by design is part of London Planning Policy and will be followed for all housing developments and it is important that this extends to the public realm surrounding new development. Consultees are particularly concerned that high rise buildings don't work well with social housing (especially when not built to a high standard) and this concern needs to be addressed in policy.
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.	Health inequalities are increasing across London rather than decreasing and high density development (tall buildings in particular) can contribute to a number of health issues through noise disturbance, overlooking and poorly maintained shared areas. Good design (and management) is going to be crucial in ensuring these problems do not arise. Each of the options (without considerations of good design and management) could have an effect on healthy neighbourhoods in this way. Another impact relates to ensuring that adequate health care is available for everyone and this access to health care (and other services) is going to be vital in deciding where to locate high density development. Option A in particular poses a risk that tall buildings will be located in areas where public services are already over-subscribed. More consideration can be given to adequate services through Options B and C.
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.	As with health care, the main effect is likely to come from the ability of the planning system to ensure that adequate services are available for everyone and this access to services is going to be vital in deciding where to locate high density development. Option A in particular poses a risk that tall buildings will be located in areas where public services are already over-subscribed. More consideration can be given to adequate services through Options B and C. Consultees feel that tall buildings may not always be appropriate in every part of the borough, particularly where residential density is already high and local community facilities; public transport and open space are already used to capacity.
4. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	There is a concern amongst consultees that high rise buildings don't work well with social housing (especially when not built to a high standard) and this applies especially to certain vulnerable groups such as the elderly and other vulnerable people because of the importance of the lifts and the fact that they feel people interact and support each other less in high rise buildings. This is borne out in the consultation. This is an issue which affects each of the options and needs to be considered in policy.
5. Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home	

<b>Issue 9 - Where should we locate tall buildings, subject to safeguarding protected views and World Heritage Sites?</b>	
and the protection of local amenity.	
6. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	As already discussed few consultees feel that high rise buildings are suitable for purely social housing. Among the minority who support residential high-rise buildings the quality of building design, infrastructure and tenure are all thought to play a role in determining the success of the development. All qualitative respondents feel that tall buildings, whether for residential or commercial need to be sympathetically sited and in keeping with their surrounds.
<b>ENVIRONMENTAL</b>	
7. 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.	<p>There are a number of protected vista's affecting Lambeth:</p> <ul style="list-style-type: none"> <li>• From Parliament Hill to Palace of Westminster (MP2) (north of the Borough)</li> <li>• From Primrose Hill to Palace of Westminster (MP4) (north of the Borough)</li> <li>• From Westminster Pier to St Pauls (MP8) (north of the Borough)</li> <li>• From King Henry VII's Mound Richmond to St Pauls (MP9) (north of the Borough)</li> </ul> <p>The London Plan says that tall buildings should create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings (policy 4B.9). There is little pro-active opportunity to address the issue of protected vista's or the London Plan policies within Option A. The option is very reactive to planning applications and would not give local people any certainty about the future location of tall buildings. Options B and C give more opportunity to plan pro-actively and a combination of the two would enable the council to consider the factors that are necessary for successful high rise development (and the areas that most successfully fulfill these) and also the areas which (for any reason) would not be able to sustain such levels of development.</p>
8. 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.	This is an important issue because traffic congestion is a major concern for residents. Clustering tall buildings can lead to transport efficiencies if they are located near to good public transport links. All of the options would be able to address this issue. However Options B and C give more opportunity to plan proactively to ensure transport systems are not overloaded.
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	Access to green space is limited in certain areas of the Borough, most notably in the north. Access to green space should be considered for all new dwellings regardless of size and improvements made where necessary. Certain design features can be integrated in high density development that can assist biodiversity including green roofs. Green areas and landscaping in high density developments is also more likely to be in the public realm, therefore, there are more opportunities to integrate biodiversity measures. Policies should be put in place to encourage biodiversity enhancement.

<b>Issue 9 - Where should we locate tall buildings, subject to safeguarding protected views and World Heritage Sites?</b>	
10. 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.	Energy use in homes is the largest source of CO <sub>2</sub> in London so it is important to take action to reduce residential emissions. All of the Options under consideration should have regard to the targets contained in the Mayor of London's Energy Strategy, for example, concerning energy efficiency in new dwellings and incorporation of renewable energy generating technologies.
11. 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.	The northern parts of Lambeth, in the vicinity of the River Thames, lie within Flood Zone 3, as designated by the Environment Agency, due to risk of tidal flooding. Therefore, consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth. The effects of a changing climate and reductions in river flow are likely to make water supply a vital issue for any new development. Both options have the potential to score positively especially given the London Plan target of 105 litres pppd and the Code for Sustainable Homes standards becoming mandatory.
12. 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.	Good solid waste management is vital when planning for tall buildings and policies should be developed to deal with this regardless of which options is chosen.
13. Air quality. To improve air quality.	The main impact is likely to be from transport and all of the options would be able to address the issue of location near to public transport.
<b>ECONOMIC</b>	
14. Education and skills. To maximise the education and skills levels of the population.	All new housing should contain dedicated storage space for separating waste for recycling, and should be provided with shared recycling facilities and kerb-collection services.
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	Tall buildings are vital for future commercial development especially in areas in the north of the Borough such as Vauxhall and Waterloo. This can be addressed through any of the options but as already discussed Options B and C give more opportunity to plan pro-actively.
16. 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.	Tall buildings will give an efficient use of land, especially if developed on previously developed sites. All of the options have the opportunity to score positively in this regard.

<b>Issue 9 - Where should we locate tall buildings, subject to safeguarding protected views and World Heritage Sites?</b>	
<p>17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.</p>	<p>See above (local economy).</p>
<p><b>Conclusions</b>  Option A is very reactive to planning applications and would not give local people any certainty about the future location of tall buildings. Options B and C give more opportunity to plan pro-actively and a combination of the two would enable the council to consider the factors that are necessary for successful high rise development (and the areas that most successfully fulfill these) and also the areas which (for any reason) would not be able to sustain such levels of development. Two factors that are important in making tall buildings a success are good design (and management) and location of tall buildings in areas where adequate public services are available. Option A in particular poses a risk that tall buildings will be located in areas where public services are already over-subscribed. More consideration can be given to adequate services through Options B and C.</p> <p><b>Uncertainties</b>  None.</p> <p><b>Recommendations/Mitigation</b></p> <ul style="list-style-type: none"> <li>• Consultees are particularly concerned that high rise buildings don't work well with social housing (especially when not built to a high standard) and this applies especially to elderly and other vulnerable people. Can this be addressed in policy? This could either be through limiting tall buildings to mainly private development or offices or through design and management policies.</li> </ul>	