

Sustainability Appraisal Adoption Statement – Lambeth Local Plan

This statement has been prepared in compliance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The Lambeth Local Plan was adopted on 23rd September 2015. The Local Plan as adopted, accompanying Sustainability Appraisal (incorporating Strategic Environment Assessment), and a copy of this adoption statement may be viewed:

- at all borough libraries (library opening hours are available on the council website)
- at Phoenix House reception, 10 Wandsworth Road, SW8 2LL (Mon-Fri 0900-1700)
- on the council's website at www.lambeth.gov.uk/planning

Regulation 16 requires the council to produce a statement on the following particulars:

a) How environmental considerations have been integrated into the plan or programme

The SA Framework (ie sustainability objectives) used in the appraisal of the Lambeth Local Plan was first developed in the Scoping Report of the Core Strategy and then subsequently updated in response to consultation comments received. Local Plan policies, including site allocations, were appraised against the following 18 sustainability objectives:

	SA Objective
1	Crime and safety. Ensuring safe communities with reduced crime and disorder.
2	Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.
3	Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.
4	Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.
5	Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.
6	Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.
7	Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.
8	Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets.'
9	Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.
10	Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.
11	Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.
12	Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.
13	Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the

	production of waste and increasing re-use, recycling, remanufacturing and recovery rates.
14	Air quality. To improve air quality.
15	Education and skills. To maximise the education and skills levels of the population.
16	Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.
17	Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.
18	Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.

At each stage of development of the Local Plan, the findings of the sustainability appraisal were taken into account to inform policy development. This process commenced with scoping reports and issues and options and full sustainability appraisal for the development of the Core Strategy. The Core Strategy 2011 set out the spatial strategy, vision and objectives for Lambeth Borough. These were carried through in the preparation of the Lambeth Local Plan 2015 as they were recently adopted.

Accordingly, preparation and development of the Lambeth Local Plan involved only a partial review of elements of the Core Strategy. As the spatial strategy, vision and objectives of the Core Strategy were appraised as part of the Core Strategy process, and remain unchanged in the Lambeth Local Plan; there was no need to appraise them again in the SA of the Lambeth Local Plan. Therefore previous SA analysis, including reasonable alternatives on the spatial strategy, spatial vision, strategic objectives and most strategic policies remained relevant (see Sustainability Appraisal and SEA of London Borough of Lambeth Submission Core Strategy 2009 (provided as Appendix 7 of the final SA Report)). There was factual updating of the strategy, vision, objectives and some policies; however the nature of this was not such that it fundamentally impacted on the policy approach or previous SA / SEA conclusions. However, for completeness, the Local Plan objectives (carried through from the Core Strategy) were appraised for compatibility with the SA objectives. The following strategic policies were subject to a review of approach since the adoption of the Core Strategy 2011:

- Affordable housing
- Gypsies and travellers
- Student housing
- KIBAs
- Loss of B class use outside KIBAs
- Retail capacity
- Management of town centre uses
- Schools on employment land
- Sustainable design and construction (includes targets)
- Vauxhall
- Brixton
- Loughborough Junction
- Upper Norwood

The Lambeth Local Plan also introduces a number of new additional policies and these, together with the Core Strategy policies that were subject to a review of approach, were subject to sustainability appraisal.

In February 2013 a SA was prepared on the draft Local Plan. This made 176 recommendations to improve policy performance of the Plan (ie maximise positive effects or reduce negative effects). The council considered each recommendation and where appropriate, changes were made to policy in the revised Local Plan. A schedule of the recommendations together with accompanying council response was prepared (see Appendix 2 of the final SA Report Nov 2013). A further SA was undertaken on this revised Local Plan (the emerging Lambeth Local Plan Proposed Submission). This

SA was published in November 2013 and contained a further 22 recommendations to maximise positive effects or mitigate negative effects of the Plan. Each of these recommendations was considered in finalising the Lambeth Local Plan Proposed Submission, with most recommendations accepted and policies amended.

During the examination process, the Inspector identified a number of main modifications considered necessary to make the Plan sound and legally compliant. These main modifications were subject to public consultation for a period of six weeks and further sustainability appraisal. In assessing legal compliance of the Lambeth Local Plan, the Inspector's Report states that 'SA has been carried out and is adequate'. Accordingly it is considered that environmental considerations have been taken into account at all stages of the plan making process.

b) How the environmental report has been taken into account

At each stage of development of the Lambeth Local Plan the findings of the sustainability appraisal were taken into account to inform policy development. At issues and options and draft Local Plan stages, the development of the Core Strategy and then the Local Plan has involved a process of considering different ways of achieving the Plan's objectives. These are called alternatives. Alternatives were first considered for the whole Plan (called strategic alternatives) and then for individual policies (called policy alternatives). The SA considered the effect of different alternatives on the sustainability objectives. Appraisal of the strategic alternatives and of many of the policy alternatives was done in the SA of the Core Strategy. The SA of the Core Strategy can be viewed on the council website online in the local plan examination library as Appendix 7 of the final SA Report Nov 2013.

Where Local Plan policies are different from those appraised before, alternatives have been considered and appraised for these new policies. These broadly include the following areas: affordable housing, housing mix, student housing, KIBAs, business uses outside KIBAs, railway arches, town centres, evening economy and food and drinks uses, A2 uses, hot food takeaways near schools, skills and training, schools, food growing spaces, and waste management. The SA on the Draft Local Plan appraised the reasonable alternatives identified for these areas, and a summary of SA analysis of reasonable alternatives is provided in Appendix 5 of the final SA Report. The outcomes of the SA work, together with consultation feedback fed in to the Lambeth Local Plan Proposed Submission November 2013. Some key changes to policy approach resulting from this process include different retail capacities and different food and drink uses specific for each town centre (recognising the spatial variations of these uses across the borough) and controlling hot food takeaways near schools even within town centres.

A SA on the Draft Local Plan was published in early March 2013 for consultation alongside the draft Local Plan. The SA prepared on the Draft Local Plan made 176 recommendations for policies and site allocations and all of these were considered in the preparation of the Lambeth Local Plan Proposed Submission November 2013. Where appropriate, changes were made to policy. A schedule of the SA recommendations alongside changes to policy and council responses was prepared and is available as Appendix 2 of the final SA Report, Nov 2013.

In November 2013 the SA on the Lambeth Local Plan Proposed Submission was published for public comment, alongside the Lambeth Local Plan Proposed Submission. This iteration of SA identified a

further 22 recommendations which were taken into account in preparing the Lambeth Local Plan Proposed Submission. In some cases this has resulted in a change of effect from negative to positive. For example in assessing policy EN5 on flood risk against SA Objective 12, the policy was improved to ensure flood defences remain in good condition (original policy inadvertently may have allowed defences to get to poor condition). Similarly policy EN6 was improved through the SA process by ensuring adequate water supply capacity to serve new developments (original policy only concerned sewerage capacity).

c) How opinions expressed as a result of consultation have been taken into account

Extensive consultation was carried out throughout the development of policy and consultation responses were taken into account alongside sustainability appraisal and evidence base studies in the drafting and refinement of policies. Representations received on the SA of the draft Lambeth Local Plan were also taken into account in undertaking the SA on the Lambeth Local Plan Proposed Submission. Further information on this can be found in Appendix 4 of the final SA November 2013.

The Draft Lambeth Local Plan Consultation Report June 2013 and Lambeth Local Plan Proposed Submission Consultation Statement, Dec 2013 summarises results of the public consultation. The findings helped inform amendments to Local Plan policy.

d) Any trans-boundary consultations with other Member States

No trans-boundary consultations with other Member States were deemed necessary in preparing the Lambeth Local Plan or undertaking its Sustainability Appraisal.

e) Reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with

Reasonable alternative (RA) approaches have been considered in the Local Plan making process for those policies that differ from adopted Core Strategy policy and new development management policies, and these are set out in the Topic Papers (see Evidence Base library). These RA's of policies were evaluated in the SA of the Draft Local Plan (i.e. SA dated February 2013) and a summary table of results is provided in Appendix 5 of the final SA Report (Nov 2013). Appendix 5 of the final SA Report provides a summary of the broad strategic options and policy alternatives identified and their assessment as part of the development of the adopted Core Strategy and the new Lambeth Local Plan. For some policies, no reasonable alternatives have been identified. A review of approach for policies having no reasonable alternative identified is also provided in Appendix 5. The final SA Report (Nov 2013), including its appendices demonstrate that reasonable alternatives have been considered, setting out a clear explanation of how alternatives were generated, appraised, selected or rejected and the role that Sustainability Appraisal and community engagement have played in that process.

f) Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

The table below sets out the indicators to measure significant and uncertain environmental effects for each sustainability objective:

Score	Timescale	Probability	Permanent or temporary	Indicators to monitor significant and uncertain effects
1. Ensuring safe communities with reduced crime and disorder				
++	Medium term	Likely	Permanent	<ul style="list-style-type: none"> ▪ Percentage of proposals directly incorporating 'Secured by Design', 'Designing Out Crime' and 'Safer Places' principles or receiving Secure by Design accreditation ▪ Recorded crimes per 1,000 households ▪ Resident surveys on perception of crime and level of safety in town centres ▪ Resident surveys on perception of crime and level of safety in public open spaces.
2. Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health				
++	Medium to long term	Likely	Permanent	<ul style="list-style-type: none"> ▪ Annually Updated Infrastructure Schedule ▪ Life expectancy ▪ Deaths from heart disease less than 75 years ▪ Amount of unrestricted open space per 1000 population ▪ Percentage of non-residential buildings achieving BREEAM Excellent ▪ Percentage of homelessness in the Borough ▪ Provision of childcare places per 1000 under 5's ▪ New child play spaces created in completed residential developments ▪ Child obesity levels. ▪ Parks with Green Flag Awards
3. 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				
++/?	Public realm improvements – medium term	Likely Funding for public transport capacity	Permanent	<ul style="list-style-type: none"> ▪ Index of Multiple Deprivation ▪ Average distance of households and bus stations to health/medical centres ▪ Proximity of new housing developments to services, facilities and

	Large scale transport improvements – long term	improvements uncertain at this stage		<p>employment</p> <ul style="list-style-type: none"> ▪ Improvement in unrestricted open space per 1000 population ▪ Number of private vehicles owned by residents in the Borough ▪ Updated Infrastructure Schedule ▪ Walking mode share based on all trips originating within Lambeth - target 32% by 2026 ▪ Cycling mode share based on all trips originating within Lambeth - target 8% by 2026
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands				
?	Medium to long term	Likely although some infrastructure (school places, healthcare, transport) is uncertain at this time	Permanent with temporary effects until such infrastructure is delivered. Also temporary construction effects	<ul style="list-style-type: none"> ▪ Annual update of Infrastructure Programmes Schedule
5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion				
+/?	Infrastructure to support growth – long term; otherwise short - medium term	Transport is uncertain, otherwise achievement is likely	Permanent	<ul style="list-style-type: none"> ▪ Annual update of infrastructure programmes schedule.
6. Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity				
++/?	Mid- Long term	Likely although delivery of housing in	Permanent	<ul style="list-style-type: none"> ▪ Number of new dwellings permitted ▪ Number of new dwellings completed each year ▪ Number of new affordable dwellings built each year

		current economic climate / recent trends is uncertain in the short-term	Temporary construction effects	
7. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place				
++/?	Mid–Long term	Likely	Permanent	<ul style="list-style-type: none"> ▪ Diversity of resident ethnicity ▪ Resident surveys on satisfaction parks and open spaces ▪ Resident surveys on perception of crime and level of safety in public ▪ Level of population churn ▪ Annual update of Infrastructure Schedule
8. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets				
++/?	Historic and open spaces environments – short term and continuing; redevelopment / public realm medium to long-term as developments complete	Likely	Permanent	<ul style="list-style-type: none"> ▪ The number of buildings on the English Heritage Listed Buildings at Risk Register and the risk levels ▪ Number of listed buildings within the Borough ▪ Number of registered parks and gardens ▪ Number of conservation areas with up to date character appraisals ▪ Number of approved Archaeological Assessment Statements ▪ Annual update Infrastructure Schedule
9. 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				
++/?	Walking and cycling short – long term; major transport infrastructure long-term	Likely but funding for some major transport infrastructure projects currently uncertain / not secured	Permanent Temporary effects associated with construction	<ul style="list-style-type: none"> ▪ Mode of travel, particularly commute to and from work ▪ Number of people who work locally ▪ Walking mode share based on all trips originating within Lambeth - target 32% by 2026 ▪ Cycling mode share based on all trips originating within Lambeth - target 8% by 2026 ▪ Annual update of Infrastructure Schedule
10. To conserve and enhance biodiversity and to bring nature closer to people				
++	Short-term and enhancements short-medium term	Likely	Permanent; and temporary construction effects	<ul style="list-style-type: none"> ▪ Percentage of development planning approvals that have incorporated new biodiverse open space ▪ Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls) ▪ The achievement of BAP targets ▪ The change in area and condition of BAP habitats/species ▪ The change in area and percentage in positive conservation management of Sites of Importance for Nature Conservation ▪ Percentage of population located in an access to nature deficiency area.
11. 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.				
+/?	Long term	Dependent on delivery of transport infrastructure, district heating networks and	Temporary construction effects; otherwise permanent	<ul style="list-style-type: none"> ▪ Number of buildings built to BREEAM excellent or higher ▪ Number of district heating networks in the Borough and dwellings / premises linked to them.

		viability of sustainability measures in built environment		
12. 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				
+/?	Medium to long-term	Dependent on viability in implementing water efficiency measures; reducing flood risk is uncertain given high levels of development	Permanent	<ul style="list-style-type: none"> ▪ Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems ▪ Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues.
13. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates				
+/?	Long-term in terms of funding and identifying and occupying new sites; short – medium term with regards to bring vacant	Uncertainty on funding for recycling and reuse centre and meeting London Plan apportionment targets.	Temporary construction waste; otherwise permanent in management facilities once delivered, building back in	<ul style="list-style-type: none"> ▪ Annual update of Infrastructure Schedule ▪ Capacity of new waste management facilities ▪ Amount of municipal waste arising and managed by management type

	buildings back in use		use	
14. To improve air quality				
+/?	Localised efforts to improve air quality – medium term Transport infrastructure delivery and Vauxhall gyratory remodelling – long term	Likely – localised improvements Uncertainty on delivery of new transport infrastructure and improved air quality given previous efforts	Permanent with ongoing management; and temporary with regards to construction effects	<ul style="list-style-type: none"> ▪ Percentage of residents with health problems related to air pollution/quality ▪ Improvement of air quality at the monitoring stations around the Borough ▪ Annual update of Infrastructure Schedule
15. To maximise the education and skills levels of the population				
+/?	Existing schools and community services safeguarded. Short-medium term for up skilling and apprenticeships; Long term for new schools	Likely	Permanent	<ul style="list-style-type: none"> ▪ Annual update of Infrastructure Schedule ▪ Number of additional school places provided ▪ Percentage reduction of young people not in education, employment or training

16 & 18. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses; AND Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.

++/?	Short-term (construction) and long-term as developments occupied	Likely although may be slower to eventuate due to economic recession	Permanent	<ul style="list-style-type: none"> ▪ Unemployment rates ▪ Number of businesses registered in the Borough ▪ Number of vacant premises in town centres ▪ Annual update of infrastructure schedule ▪ Total amount of additional employment floor-space, by type ▪ Total amount of employment floor-space on previously developed land, by type ▪ Employment land available, by type (measures the amount and type of employment land in the borough) ▪ Total amount of floor-space for 'town centre uses' ▪ Net additional serviced bedrooms (visitor accommodation)
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17. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through reuse of previously developed land and existing buildings.

++	Short term and ongoing	Likely	Permanent	<ul style="list-style-type: none"> ▪ Number of existing vacant or dilapidated / derelict buildings brought back into use ▪ Number of regeneration projects completed in deprived areas.
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