

Draft Sustainability Appraisal

Non-Technical Summary

Lambeth Draft Site Allocations DPD

January 2022



NON-TECHNICAL SUMMARY CONTENTS PAGE

1. Introduction	iii
2. The Draft Site Allocations Development Plan Document	iii
3. The Sustainability Appraisal	v
4. Current environmental, social and economic conditions in Lambeth	vi
5. What would happen without the Draft SA DPD	vii
6. Key Sustainability Issues	viii
7. Sustainability Appraisal Framework	x
8. Sustainability Appraisal Findings	xi
<i>SustA Recommendations</i>	<i>xi</i>
<i>Consideration of Reasonable Alternatives to policy approach</i>	<i>xii</i>
9. Designated Sites including European Nature Conservation sites	xii
10. Technical Difficulties / Data Limitations	xiii
<i>Summary of SustA findings</i>	xiv

1. Introduction

- 1.1 This Non-Technical Summary summarises the findings of the Sustainability Appraisal (SustA) of the Draft Site Allocations Development Plan Document (SA DPD). A SustA promotes sustainable development through the integration of social, environmental and economic considerations into the preparation of new planning documents. It is required by Section 39 of the Planning and Compulsory Purchase Act 2004.
- 1.2 The Non-Technical Summary is part of the Draft Sustainability Report for the Draft SA DPD. The SustA report has been produced alongside the Draft SA DPD to provide guidance on its development. This report presents the key findings to date of the Sustainability Appraisal on the Draft SA DPD and provides background and relevant additional information.

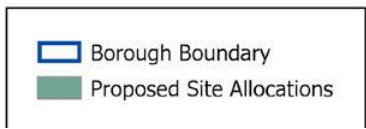
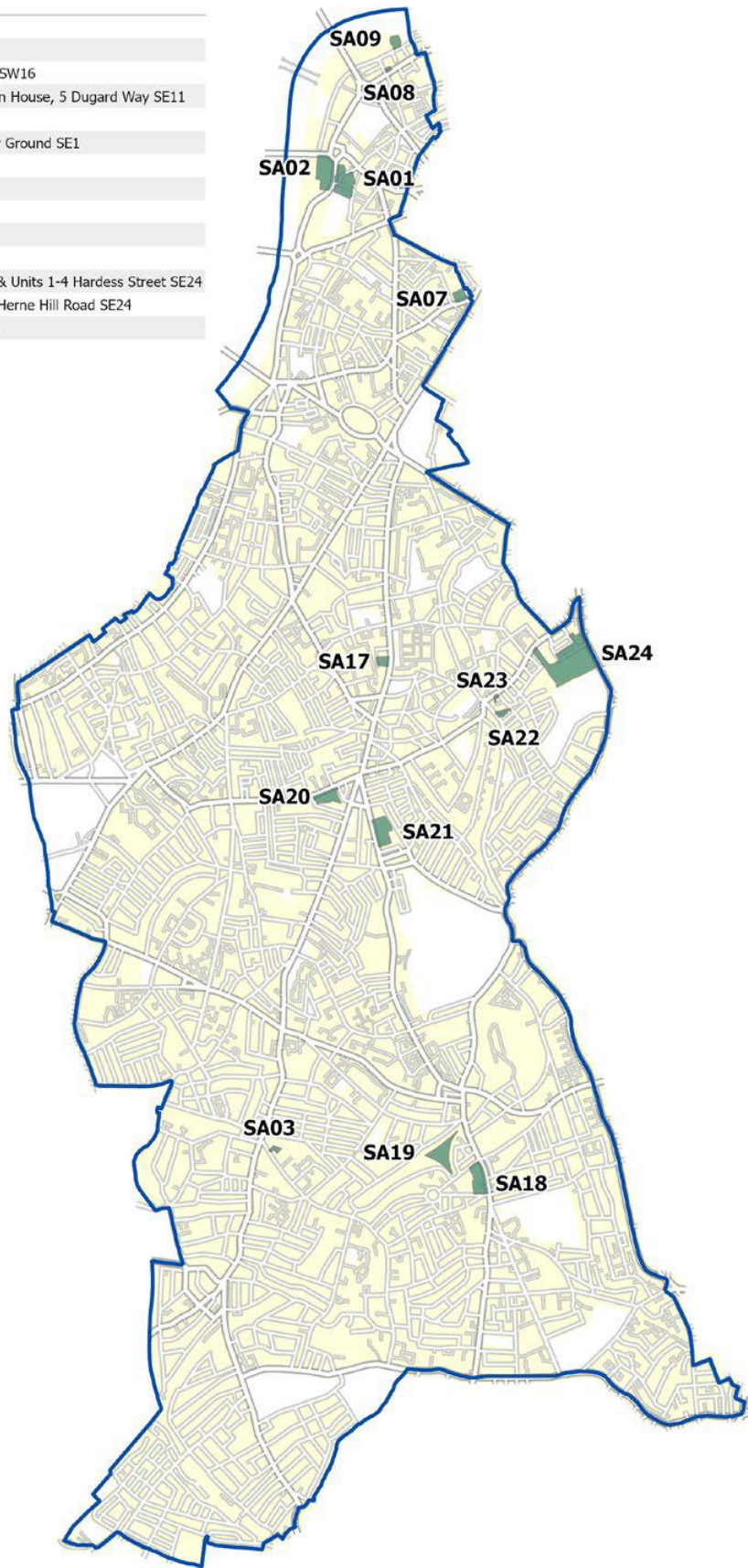
2 The Draft Site Allocations Development Plan Document

- 2.1 Once adopted, the Site Allocations Development Plan Document (SADPD) will be part of the statutory development plan for Lambeth, alongside the [Lambeth Local Plan 2021](#), the [London Plan 2021](#) and [South Bank and Waterloo Neighbourhood Plan 2019](#). It will therefore be part of the suite of planning policy documents that help deliver sustainable growth and investment in Lambeth. It will support implementation of wider Council strategies including the [Borough Plan](#), [Economic Resilience Strategy](#), [Transport Strategy](#) and emerging Climate Action Plan.
- 2.2 The SA DPD will add site-specific policies to those already in the Lambeth Local Plan 2021. The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy.
- 2.3 The Draft SA DPD adds site-specific policies to those already in the Lambeth Local Plan 2021. The Draft SA DPD should be read, and policies will be applied, alongside and in conjunction with the rest of the development plan for Lambeth, namely the London Plan, Local Plan and made neighbourhood plans.
- 2.4 The Draft SA DPD includes policies for fourteen sites, distributed across the borough as shown on Map 1 (next page). Of these sites, three have existing allocations in the Lambeth Local Plan 2021: Royal Street (Site 1); Gabriel's/Princes Wharf (Site 9) and Norwood Road (Site 18). These existing allocations will be superseded on adoption of the SADPD. The other existing allocations within the Local Plan 2021 are unaffected by the SADPD and will remain as they are in the Local Plan.

Map 1 Proposed Site Allocations

Reference Name

SA01	Royal Street SE1
SA02	St Thomas' Hospital SE1
SA03	35-37 and Car Park Leigham Court Road SW16
SA07	6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11
SA08	110 Stamford Street SE1
SA09	Gabriel's Wharf and Princes Wharf, Upper Ground SE1
SA17	330-336 Brixton Road SW9
SA18	286-362 Norwood Road SE27
SA19	Knolly's Yard SW16
SA20	Tesco, 13 Acre Lane SW2
SA21	51-65 Effra Road SW2
SA22	1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24
SA23	Land at corner of Coldharbour Lane and Herne Hill Road SE24
SA24	King's College Hospital, Denmark Hill SE5



3 The Sustainability Appraisal

- 3.1 The purpose of the SustA is to inform the decision-making process, by highlighting the potential implications of pursuing a particular strategy or policy response. It aims to make sure that the final version of the Development Plan takes a more sustainable planning approach to development in the borough.
- 3.2 Sustainability Appraisals must follow Government guidance on Sustainability Appraisal and must meet the requirements of the European Strategic Environmental Assessment Directive. A summary of the method used to undertake the SustA on the Draft SA DPD is set out below in Table I.

Equality Impact Assessment

- 3.3 It is important that the SustA adequately addresses equality and diversity issues. The council has an adopted approach to undertaking Equality Impact Assessments (EqIA) and this SustA seeks to integrate the principles of the EqIA across the sustainability objectives. This helps to explore the impact of the proposed policy on different equalities groups, (ie. ethnicity, gender, gender re-assignment, disability, age, sexual orientation, religion or belief, socio-economic factors, marriage and civil partnership, pregnancy and maternity, language, health). For example, whilst SustA objective 5 specifically addresses issues of equality and diversity, other objectives also tease out equality impacts via appropriate sub-questions.

Health and Well-being Impact

- 3.4 As with the EqIA, the Health and Well-being Impact Assessment is integrated into the SustA; an approach previously used in the preparation of Lambeth Development Plan Documents (most recently Lambeth Local Plan 2021), which was also discussed and agreed with NHS Lambeth at the time.
- 3.5 A Health Impact Assessment screening will be carried out through the inclusion of SustA Objective 2 *Health and wellbeing* and other related objectives that impact on health. Any adverse impacts identified through this screening would then be assessed through a separate full Health Impact Assessment.

Table I: SustA process thus far

Date	Actions
SA Stage A: Setting the context and objectives, establishing the baseline and deciding on scope	
July 2020	The draft Scoping Report was made available for comment to the three statutory bodies Natural England, Environment Agency and Historic England over an eight-week period from early July. The draft Scoping Report provided a summary of the current environmental, social and economic conditions in Lambeth. This baseline information of the Scoping Report assisted in the development of the Sustainability Appraisal Framework (objectives to be used to appraise the Draft SA DPD). Consultation responses were received from all three statutory bodies and their comments have been incorporated in the final Scoping Report.
Stage B: Developing and refining alternatives and assessing their effects; and Stage C: Preparing the Sustainability Appraisal Report	
January 2022	This Report. A Draft SustA on the Draft SA DPD including appraisal of reasonable alternatives. The Draft SA DPD is available for public consultation in accordance with Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) for a period of 6 weeks commencing 10 January 2022. This SustA Report is available as a supporting document to the Draft SA DPD and is also available for public comment.

4 Current environmental, social and economic conditions in Lambeth

4.1 The Scoping Report sets out a thorough account of the environmental, social and economic conditions in Lambeth. A very brief summary is provided here. The London Borough of Lambeth covers an area of about ten and a half square miles, including Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse Hill, West Norwood and Gypsy Hill. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character.

4.2 Lambeth is an area of contrasts. The northern part of the borough features internationally-significant central London activities centred around Waterloo and the South Bank area, including the South Bank Centre, major corporate offices, the London Eye and Oval Cricket Ground. Heading south this area gives way to the diverse centres of Brixton and Clapham with their unique blend of entertainment, speciality retail and cultural industries, surrounded by a culturally-diverse residential population. Further south again are the suburbs of Streatham and Norwood which also feature locally important town centres. With no strategic industrial locations in Lambeth, locally significant sites known as Key Industrial Business Areas are protected and these are scattered throughout the borough.

4.3 The borough has an important historic environment with 62 Conservation Areas covering

approximately 30 per cent of the borough including circa 2,500 listed buildings, the vast majority of which are nineteenth-century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.

- 4.4 Lambeth is a very diverse borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is the among the most densely populated local authority in England, with over 100 people living in each hectare, more than twice the London population density. Nearly a third of a million people live in Lambeth – at least 318,000. Lambeth has a relatively young age profile. Although it is a largely residential borough, it is a destination for young working age people, rather than families. It has a complex social and ethnic mix, with large African and Portuguese populations, and is an important focus for the UK black Caribbean population. The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity.
- 4.5 The proposed site allocations affect the following wards: Bishop's, Prince's, Herne Hill, Ferndale, Brixton Hill, Coldharbour, Streatham Wells, Knight's Hill and Streatham Wells. Wards such as Ferndale, Coldharbour, Prince's and Bishop's are also some of the most deprived parts of Lambeth, which is one of the most deprived areas of the country according to the Index of Multiple Deprivation.
- 4.6 Lambeth is an important part of the London economy, which has experienced growth more strongly than the rest of the UK as a whole. The north of Lambeth is an integral part of London's Central Activities Zone (CAZ), home to significant employers and cultural and tourism assets. Further south are a series of important town centres including Brixton, Clapham, Streatham and West Norwood/Tulse Hill. As well as being an important employment location, Lambeth makes a crucial contribution to London's economy as a place where young, highly skilled people live – over 45 per cent of residents are educated to degree level which is comparable with many inner London boroughs (SOB report 2016).
- 5 What would happen without the Site Allocations Development Plan Document**
- 5.1 The SA is required to look at what the effect on the current conditions would be if there was no Site Allocations DPD. Development would continue to come forward and be assessed against the current Development Plan for Lambeth, however for the 14 sites included in the Draft SA DPD there would be risk that these sites may not achieve their full potential without

a site-specific planning policy. Sites are included in the Draft SA DPD for one or more of the following reasons:

- to set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver;
- to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies;
- to articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships;
- to encourage landowners to consider the potential for optimising the development capacity of their land and help deliver key place-making objectives;
- to signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan;
- to enable key strategic infrastructure to come forward in a timely way.

6 Key sustainability issues

6.1 The diverse character of Lambeth has resulted in a number of complex sustainability issues (see Table II below).

Table II: Summary of key sustainability issues in Lambeth

Lambeth key issue	Considerations
Increase the overall supply and mix of housing , including affordable housing.	Improve access to good quality housing. Amount of affordable housing. Sustainable housing. Housing mix and types. Addressing overcrowding.
Protect and enhance heritage assets , their settings and the wider historic environment as part of reinforcing local distinctiveness and place-making.	Built heritage. Archaeology and Archaeological Priority Areas Heritage at risk Designated and non-designated heritage assets including Westminster World Heritage Site Townscape and Landscape. Urban design.
Provide the essential infrastructure to support population growth.	Infrastructure provision, including healthcare services, transport, digital connectivity and facilities; and schools.

Sustainability Appraisal Non-Technical Summary

Draft Site Allocations Development Plan Document January 2022

Lambeth key issue	Considerations
<p>Develop mixed, cohesive, safe communities accessible to all.</p>	<p>Create mixed and cohesive communities. Safer communities. Accessible environments. Meeting the needs of diverse communities.</p> <p>Addressing social inequities. Addressing causes of Multiple Deprivation. Addressing high rates of child poverty.</p> <p>Tackling crime. Tackling terrorism. Addressing fear of crime.</p>
<p>Provide good access to local services and community facilities within neighbourhoods.</p> <p>Increase public transport accessibility and promote walking and cycling.</p>	<p>Good local access to services, green infrastructure and facilities.</p> <p>Tackling congestion and overcrowding on services and roads. Increase use of public transport, cycling and walking.</p>
<p>Increase the number and variety of jobs in the local economy, including local jobs for local people.</p>	<p>Increasing jobs, particularly local jobs for local people. Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups. Tackling barriers to employment. Post covid-19 recovery and job retention Lambeth's role in London and UK economy.</p>
<p>Support the growth of key economic sectors through new business development, business retention and inward investment.</p>	<p>New business development. Business retention. Inward investment. Targeting key economic sectors. Addressing loss of employment land. Affordability of business space. Economic recovery post covid-19</p>
<p>Create viable, safe and well managed town centres.</p>	<p>Create viable, safe and well managed town centres. Mixed use development. Protection of cultural and leisure services and facilities.</p>
<p>Support the regeneration and renewal of Opportunity Areas.</p>	
<p>Reduce carbon emissions from residents, businesses, public services and buildings.</p> <p>Implement measures to help Lambeth adapt to the consequences of inevitable climate change, including flood risk management</p>	<p>Reducing CO₂ emissions. Promote a low carbon economy.</p> <p>Provision of climate change adaptation, including flood risk management, drought and heat risk and associated impacts.</p>
<p>Maximise the efficient use and management of resources, including water, energy and waste.</p>	<p>Efficient use and management of energy use and supply. Reducing fuel poverty.</p>

Lambeth key issue	Considerations
	<p>Efficient use and management of water: addressing increasing demand and improve the quality of water.</p> <p>Efficient management of waste: increasing recycling rates and self-sufficiency in waste disposal. Waste arisings in construction materials.</p>
Health and well-being	<p>Improving air quality (and meeting EU targets).</p> <p>Addressing health inequalities and the health needs of Lambeth's existing and new residents.</p>
Biodiversity, green infrastructure and open space	<p>Improving and enhancing biodiversity, habitats and green spaces.</p> <p>Increasing amount of green infrastructure</p>

7. Sustainability Appraisal Framework

7.1 The SustA Framework is a way of considering the effects of a Development Plan. It is a list of social, economic and environmental objectives that the Plan is tested against. The framework used is shown in Table III below, which also shows how each objective meets SEA (Strategic Environment Assessment) topic requirements. The SustA Framework was developed in the Scoping Report and has since been updated in response to consultation comments received. As a result, the SustA Framework presented below is slightly different to that presented in the Scoping Report.

Table III: Revised Sustainability Objectives and SEA Topic Requirement

	SA Objective	SEA Topic Requirement
1	Crime and safety. Ensuring safe communities with reduced crime and disorder.	Population
2	Good health and well-being. Promote a healthy community, including reducing health inequalities and the causes of ill health.	Population, Human 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.	Population, Human Health
4	Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	Population, Human Health, Material Assets
5	Equality and diversity. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	Population, Human Health
6	Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Population, Human Health, Material Assets
7	Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	Population, Human Health, Material Assets, Landscape, Cultural Heritage

Sustainability Appraisal Non-Technical Summary
Draft Site Allocations Development Plan Document January 2022

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 designated and non-designated historic assets.	Landscape, Cultural Heritage (including architectural and archaeological heritage)
9	Transport and travel. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	Population
10	Biodiversity. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	Biodiversity, Flora, Fauna, Landscape, Soil, Water
11	Green infrastructure. To create, manage and enhance green infrastructure.	Biodiversity, Flora, Fauna, Landscape, Soil, Water
12	Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	Climatic Factors, Materials Assets
13	Water resources and flood risk management. To protect and manage water resources (including groundwater) and to minimise floor risk.	Water, Climatic Factors
14	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.	Population, Material Assets
15	Air quality. To improve air quality and limit exposure to poor air quality.	Air
16	Local economy. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	Population, Material Assets
17	Regeneration and efficient use of land. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	Material Assets, Soil
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.	Population, Material Assets

8 Sustainability Appraisal Findings

8.1 An appraisal has been carried out on the sustainability of the Draft SA DPD policies. Table IV provides a summary of the sustainability scores for the 14 sites. Overall, the appraisal has concluded that the site allocation policies comprehensively address all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policies, taking into account the context of the site and surrounding area. Where uncertainty has been identified, these generally relate to implementation of measures on environmental objectives and/or pressure on infrastructure. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed site allocation policies.

SustA Recommendations

8.2 On the whole, it is considered that the Draft SA DPD has been produced with the premise of

sustainable patterns of urban development actively borne in mind. Where appropriate, Susta recommendations have been made to improve site allocation policy. Recommendations that have been incorporated into the Draft SA DPD include specific reference to Local Plan policy S2 (new or improved social infrastructure), that the footbridge references in Draft Site Allocation 19 is fully accessible for pedestrians, cyclists *and those with mobility issues*, and the EIA Panel recommended that officers add wording to the draft allocation policy for site 21 to ensure affordability and transitional arrangements for the Mosaic clubhouse are appropriately considered.

- 8.3 The Sustainability Appraisal has scored the sustainability effects of the Draft SA DPD using the symbols shown in Table V. Table VI presents the likely effects of the Draft SA DPD taking into account Susta recommendations.

Table V: Key symbols used in the appraisal

Symbol	Meaning
++	Significant positive effect on sustainability objective (normally direct)
+	Minor positive effect on sustainability objective
0	Neutral effect on sustainability objective
-	Minor negative effect on sustainability objective
--	Significant negative effect on sustainability objective (normally direct)
/	Policy has more than one score e.g. +/- policy could both support and conflict with the Sustainability Appraisal objective in a minor way.
?	Uncertain effect on sustainability objective

Consideration of Reasonable Alternatives to policy approach

- 8.4 Reasonable alternatives (RA) have been considered in the development of the Draft SA DPD. Identification of the reasonable alternatives for each site involved consideration of the existing landuses on site and the London Plan and Local Plan policies that would apply to the site given its location and existing landuses. Consideration of these existing landuse parameters affecting the site helped inform both the reasonable alternatives for the site and the proposed site allocation landuses.

9 Designated sites, including European Nature Conservation sites

- 9.1 The council has considered whether the Draft SA DPD is likely to have an effect on European wildlife sites, as required under European legislation. No European Sites lie wholly or partly within Lambeth Borough. Four European Sites (Richmond Park, Walthamstow Reservoirs, Wimbledon Common and Epping Forest) lie partially within 15 kilometres of the Lambeth Borough boundary. An initial screening assessment has been prepared on the

Draft SA DPD. This has concluded that the Draft SA DPD would not have an adverse impact on the integrity of the four sites and therefore the Appropriate Assessment stage of Habitats Regulation Assessment (HRA) is not required. This initial screening assessment is available for public comment alongside the Draft Sustainability Appraisal and Draft SA DPD for 6 weeks.

10 Technical difficulties / data limitations

10.1 The SustA process is a useful way to identify potential issues and make suggestions to reduce possible negative impacts. It tests how policies work against sustainability objectives. However, there are a number of uncertainties and limitations that exist in the sustainability appraisal process, which are summarised below:

- The principal source of difficulty undertaking the SustA is the reliance on the judgement of predicting and assessing effects. However, the SustA has been undertaken by a professional in town planning and sustainability issues. Consultation on the SustA report will also add value to the process through the views of other 'experts' and interested stakeholders to review the effects identified and provide alternative opinions for further consideration.
- Potential complexities in respect of predicting the impact of the SA DPD in the long term (for example uncertainties under the current difficult economic climate, aftermath of COVID-19, funding gaps for some infrastructure projects and post Brexit arrangements).
- Complexities associated with and distinguishing between and separating out the influence of the Draft SA DPD, and other Development Plan Documents from other external factors. For example, whilst specific local conditions such as air quality, carbon emissions or health could be getting worse, this could be due to various factors beyond the control of the Development Plan, and the Draft SA DPD (and other Development Plan Documents) itself may still have a positive influence in so far as planning can influence such areas.
- A further difficulty was deciding how *significant* the effects of the Draft SA DPD are. This is particularly true for sustainability objectives such as health which are influenced by a wide range of factors

Sustainability Appraisal Non-Technical Summary

Draft Site Allocations Development Plan Document January 2022

Table VI: Likely effects of Draft site allocations policies on SustA Objectives

Sustainability Appraisal Objective	Site1	Site2	Site3	Site7	Site8	Site9	Site17	Site18	Site19	Site20	Site21	Site22	Site23	Site24
SustA 1: Crime	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 2: Health	+/++	+/++	+/++	+/0	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 3: Access	+/++/?	+/++	+/++	+/++/?	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 4: Infrastructure	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?
SustA 5: Equality	+/++	+/++	+/++	+/?	+	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 6: Housing	++	0	++	++	++	++	++	++	++	++	++	++	++	0
SustA 7: Liveability	+/++	+/++	+/++	+/?	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 8: Built Environ	+/++/?	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 9: Transport	+/++/?	+/++	+/++	+/++/?	+/++/?	++	++	++	++	++/?	++	++	++	++
SustA 10: Biodiversity	+/++	+/++	++	0/?	0/?	0/?	0/?	0/?	+/++	0/?	0/?	0/?	0/?	0/?
SustA 11: Green Infrastruct	+/++	+/++	++	+/++	+/++/?	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 12: Energy	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?
SustA 13: Water/Flood risk	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?
SustA 14: Waste	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
SustA 15: Air quality	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?	+/?
SustA 16: Economy	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 17: Efficient land	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++
SustA 18: Employment	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++	+/++

Page intentionally blank

Draft Sustainability Appraisal

Lambeth Draft Site Allocations DPD

January 2022



Table of Contents

1.	Introduction	4
	What is this report and what is the Draft SA DPD?	4
	Purpose of this Draft Sustainability Appraisal Report	8
	Consultation.....	8
2.	SUSTAINABILITY APPRAISAL Approach	10
	Background	10
	Sustainability Appraisal and Strategic Environmental Assessment	11
	Equalities Impact Assessment.....	12
	Health and Well-being Impact	13
	Habitat Regulations Assessment.....	13
	Consultation and Approach and Influence of Sustainability Appraisal to date	13
	The Five Stages of Sustainability Appraisal.....	14
	Limitations of the SustA process.....	16
3.	Summary of STAGE A: The SUSTAINABILITY APPRAISAL Framework	17
	Stage A1: Relevant plans, policies, programmes and strategies	17
	Stage A2: Baseline Information.....	17
	Stage A3: Identifying key sustainability, health and equality, crime and safety issues.....	19
	Stage A4: Developing the Sustainability Appraisal Framework.....	21
	Stage A5: Consulting relevant authorities on the scope of the Sustainability Appraisal.....	36
4.	STAGE B: Developing and refining alternatives and assessing effects	37
	Stage B1: Testing the objectives against the sustainability appraisal framework.....	37
	Stage B2: Developing options including reasonable alternatives.....	37
	Developing reasonable alternatives	38
	Appraising reasonable alternatives	52
	SA1: Royal Street, SE1	53
	SA2: St Thomas’ Hospital, SE1.....	55
	SA3: Car Park, Leigham Court Road, SW16 2NF.....	57
	SA7: 6-12 Kennington Road and Wooden Spoon House, 5 Dugard Way, SE11.....	59
	SA8: Stamford Street, SE1.....	61
	SA9: Gabriel’s Wharf and Princes Wharf, SE1.....	63
	SA17: 330-336 Brixton Road, SW9	65
	SA18: 286-362 Norwood Road, SE27	67
	SA19: Knolly’s Yard, SW16	69
	SA20: Tesco, Acre Lane, SW2	71
	SA21: 51-65 Effra Road, SW2	73

SA22: 1&3-11 Wellfit St, 7-9 Hinton Rd & Units 1-4 Hardess St, SE24.....	75
SA23: Land at corner of Coldharbour Lane and Herne Hill Road, SE24	77
SA24: King’s College Hospital, Denmark Hill, SE5	79
Stages B3 and B4: Evaluating likely effects, consideration of mitigation and maximisation of benefits	81
SA1: Royal Street, SE1	83
SA2: St Thomas’ Hospital, SE1.....	87
SA3: 35 – 37 and Car Park, Leigham Court Road, SW16	90
SA7: 6-12 Kennington Road and Wooden Spoon House, 5 Dugard Way, SE11.....	93
SA8: 110 Stamford Street, SE1	96
SA9: Gabriel’s Wharf and Princes Wharf, Upper Ground, SE1	99
SA17: 330-336 Brixton Road, SW9	102
SA18: 286-362 Norwood Road, SE27	105
SA19: Knolly’s Yard, SW16	109
SA20: Tesco, Acre Lane, SW2	112
SA21: 51-65 Effra Road, SW2	115
SA22: 1&3-11 Wellfit St, 7-9 Hinton Rd & Units 1-4 Hardess St, SE24.....	118
SA23: Land at corner of Coldharbour Lane and Herne Hill Road, SE24	121
SA24 King’s College Hospital, Denmark Hill, SE5	124
Stage B5: Monitoring significant effects	127
5. Conclusion.....	128

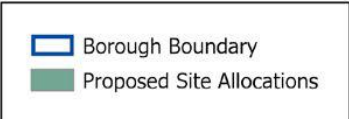
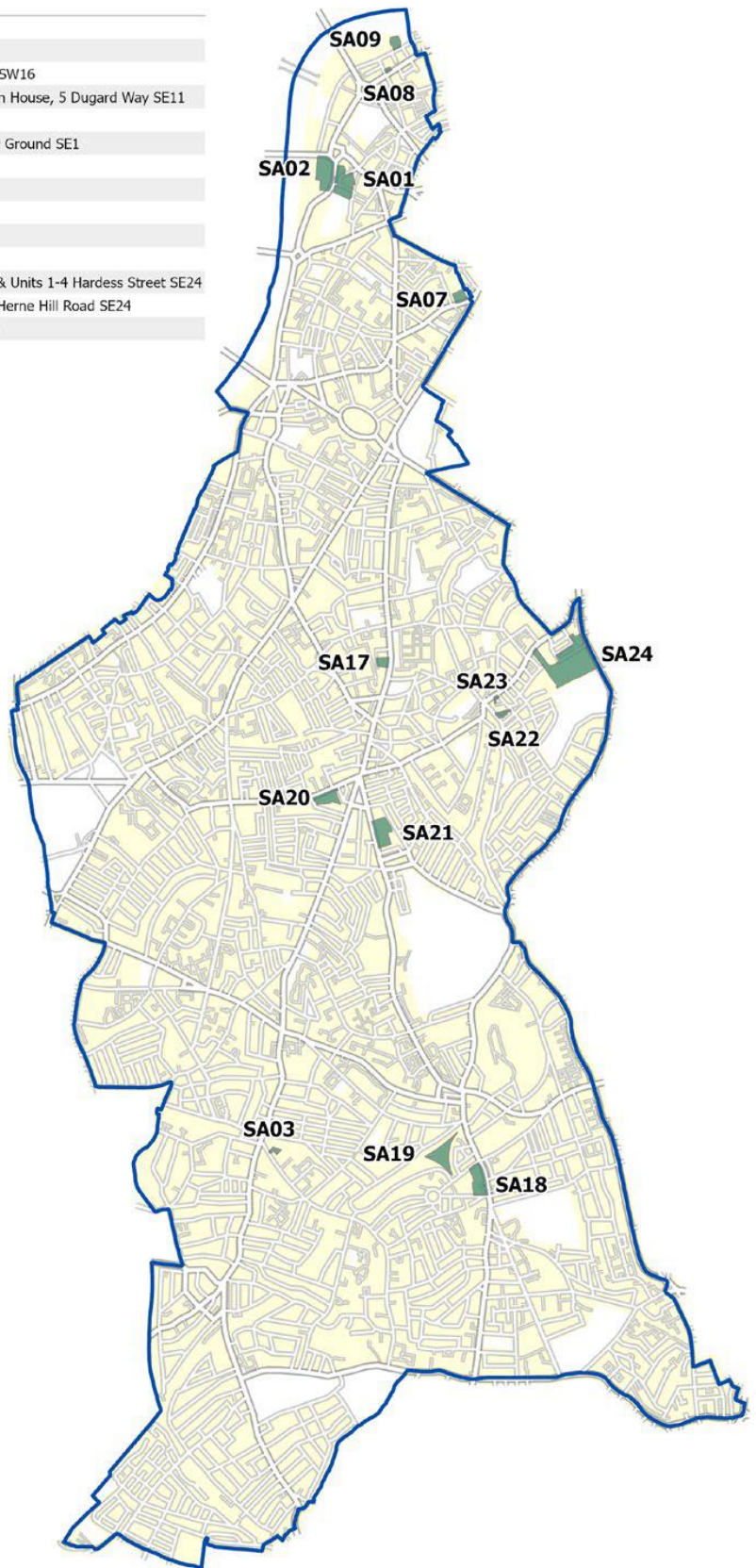
1. INTRODUCTION

What is this report and what is the Draft SA DPD?

- 1.1 Lambeth Council has begun preparation of the Draft Site Allocations Development Plan Document (SA DPD). The Draft SA DPD will form part of the statutory development plan for Lambeth, alongside the revised Lambeth Local Plan, the London Plan 2021 and South Bank and Waterloo Neighbourhood Plan 2019. It will therefore be part of the suite of policy documents that help deliver sustainable growth, investment and opportunity in Lambeth, along with the revised CIL Charging Schedule and emerging supplementary planning documents. It will also support implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and emerging Climate Action Plan.
- 1.2 The SADPD will add site-specific policies to those already in the Lambeth Local Plan 2021. The principal objective of the SADPD is to unlock investment on these sites through the mechanism of site-specific planning policy.
- 1.3 The Draft SA DPD includes emerging site allocation policies for fourteen sites, distributed across the borough (see Map 1). All have potential to deliver housing alongside commercial uses, apart from two that relate to hospital campuses. Of these fourteen sites, three have existing allocations in the Lambeth Local Plan 2021 (Royal Street (Site 1), Gabriel's/Princes Wharf (Site 9) and Norwood Road (Site 18)). These existing allocations will be superseded on adoption of the SA DPD. The other existing allocations within the Local Plan 2021 will be unaffected by the SA DPD and will remain as they are. The numbering of the proposed allocations in the Draft SA DPD is designed to work alongside the numbering of the existing allocations in the Local Plan 2021.

Map 1: Proposed Site Allocations

Reference Name	
SA01	Royal Street SE1
SA02	St Thomas' Hospital SE1
SA03	35-37 and Car Park Leigham Court Road SW16
SA07	6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11
SA08	110 Stamford Street SE1
SA09	Gabriel's Wharf and Princes Wharf, Upper Ground SE1
SA17	330-336 Brixton Road SW9
SA18	286-362 Norwood Road SE27
SA19	Knolly's Yard SW16
SA20	Tesco, 13 Acre Lane SW2
SA21	51-65 Effra Road SW2
SA22	1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24
SA23	Land at corner of Coldharbour Lane and Herne Hill Road SE24
SA24	King's College Hospital, Denmark Hill SE5



1.4 Sites are included in the Draft SA DPD for one or more of the following reasons:

- To set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver;
- To address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies;
- to articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships;
- to persuade landowners to consider the potential for optimising the development capacity of their land and help deliver key place-making objectives, where they might otherwise be uncertain about what would be supported;
- to signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan;
- to enable key strategic infrastructure to come forward in a timely way.

1.5 It is not necessary, or recommended, to have a site-specific allocation for every potential development site in the borough. Many larger sites can and do come forward successfully without such a policy, with sustainable development achieved through application of the borough-wide and neighbourhood-level policies in the development plan as a whole. There is also no need in Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the revised Lambeth Local Plan. However, the new site allocation policies will help to accelerate delivery of housing in the borough, maintain the necessary pipeline of new housing and thereby ensure housing delivery targets continue to be achieved. They will also enable the timely renewal and optimisation of social infrastructure and commercial floorspace.

1.6 The guiding approach in developing the draft site allocation policies is design-led optimisation of development capacity, as required by London Plan policy. This has involved analysis of the optimum mass and height that can be achieved, having regard to all planning constraints relevant to that site, including impacts on neighbouring uses, views, townscape and heritage assets. Key spatial objectives have been factored in and identified, such as opportunities to contribute to strategic place-making – for example the Central Activities Zone and potential for an SC1 life-sciences/innovation district, South Bank creative and cultural quarter, town centres,

or the growing cluster of flexible workspace in West Norwood/Tulse Hill. Other objectives addressed include improvement in movement and permeability, healthy routes and active travel, townscape, public realm, community safety and urban greening. Consideration of viability has informed indicative development quantum and the expectations around delivery of affordable housing and affordable workspace (where relevant).

- 1.7 Existing development plan standards for housing quality, amenity space, parking, urban greening and zero carbon will apply to these sites, but the ambition for exemplary approaches in meeting these standards has been signalled in the Draft SADPD. Where possible, additional site-specific guidance has been included on matters such as flood risk mitigation and air quality. The aspiration for key public benefits is also signalled, such as employment and skills contributions tailored to particular growth sectors.
- 1.8 This report is the Draft Sustainability Appraisal (SustA) report for the Draft SA DPD. Section 19 of the Planning and Compulsory Purchase Act 2004 requires local authorities to undertake a SustA for Development Plan Documents. The EU Directive 2001/42/EC requires the Strategic Environmental Assessment (SEA) of the *environmental* effects of certain plans and programmes on the environment. The SustA extends the reach of the SEA to incorporate *economic* and *social* issues relevant to the plan or programme. Therefore, this report assesses the environmental, social and economic effects of the Draft Site Allocations DPD.
- 1.9 This document represents the second stage (Stage B) of the SustA for the Draft SA DPD, following on from the draft SustA Scoping Report in 2020 (Stage A). The SustA on the Draft SA DPD will incorporate Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) into a single framework.
- 1.10 The SustA will be carried out as an iterative process that considers the impacts of emerging site allocation policies and proposes policy alterations or mitigation for any adverse impacts that may be identified.
- 1.11 The SustA process is carried out alongside the preparation of the Draft Site Allocations Development Plan Document process, and where applicable, makes recommendations to enhance potential positive outcomes and minimise negative

outcomes of the proposed draft site allocation policies. This Draft SustA Report is subject to public consultation alongside the Draft SA DPD. Accordingly, the Draft SA DPD is likely to be further refined after the initial round of public consultation in response to the SustA process of maximising benefits and/or minimising adverse effects as well as in response to any forthcoming consultation comments.

Purpose of this Draft Sustainability Appraisal Report

1.12 This report presents the sustainability appraisal work on the Draft SA DPD. The SustA process assists in determining the impact the Draft SA DPD is likely to have on baseline sustainability issues in the borough. The purpose of the SustA is not to identify the best option but rather inform the decision-making process by highlighting potential implications of pursuing a particular policy response. Accordingly, the SustA, including appraisal of reasonable alternatives, has informed the drafting of the SA DPD for Regulation 18 consultation.

1.13 This Draft SustA report is organised into the following sections:

- Section 2 presents a brief overview of Sustainability Appraisal approach
- Section 3 sets out the process of Sustainability Appraisal Scoping Report including:
 - Context review (stage A1)
 - Baseline review (stage A2)
 - Key issues (stage A3)
 - Sustainability Appraisal framework (stage A4)
 - Consultation on the Sustainability Appraisal Scoping Report (stage A5)
- Section 4 is stage B of the SustA process and sets out appraisal of the reasonable alternatives and the proposed site allocation policies.
- Section 5 is the Conclusion.

Consultation

1.14 This Draft SustA Report is subject to public consultation alongside the Draft Site Allocations Development Plan Document. The Draft SustA Report will be sent to statutory consultees Natural England, the Environment Agency and Historic England

for their comment. It will also be sent to neighbouring boroughs and the GLA. In addition, the SustA report will be published on Commonplace for the opportunity for public consultation. Consultation on this Draft SustA Report for the Site Allocations Development Plan Document will take place for 6 weeks from 10 January to 21 February 2022.

2. SUSTAINABILITY APPRAISAL APPROACH

Background

- 2.1 This section explains the approach the council is taking to the SustA of the Draft SA DPD and how this sits with the various legal duties.
- 2.2 The SustA process is an iterative process which informs the development of plan policies considering reasonable alternatives and evaluating them to establish the most sustainable option for final policy. For equality impacts and health impacts this will take the form of a screening assessment and any adverse impacts identified would then trigger need for a separate relevant detailed assessment.
- 2.3 These screening assessments will be integrated into a single process following the statutory requirements of a Sustainability Appraisal and Strategic Environmental Assessment (SEA) methodology. Overall, the SustA will assess the extent to which the Draft Site Allocations Development Plan Document will help to achieve relevant sustainability (environmental, economic, social), health and equality objectives.
- 2.4 SustA needs to be proportionate and appropriate to the type of plan and policies under consideration. As stated above the Draft SA DPD will sit alongside the Lambeth Local Plan 2021, London Plan 2021 and South Bank and Waterloo Neighbourhood Plan 2019 and therefore policies within these plans will also apply to the Draft SA DPD. All three of these development plans have undergone sustainability appraisal / integrated impact assessment and all three plans have been found sound through their respective independent examinations. The London Plan had a supporting [Integrated Impact Assessment](#) (IIA) comprising Strategic Environment Assessment, Sustainability Appraisal, EqIA, Health Impact Assessment and Community Safety Impact Assessment. A [Supplementary Equalities Impact Assessment Information](#) was also prepared. The Local Plan 2021 was subject to [Sustainability Appraisal](#) including equalities impact assessment. The Inspector for the Draft Revised Lambeth Local Plan found the SustA to be 'wide ranging and thorough' (para 40 of the [Inspectors Report](#)). All London Plan and Local Plan policies will apply to the proposed site allocations and as demonstrated

above all those policies within those plans have been subject to sustainability assessments.

Sustainability Appraisal and Strategic Environmental Assessment

2.5 Strategic Environmental Assessment (SEA) is a process of identifying and evaluating the environmental impacts of a plan or programme. The SEA Directive came into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Development Plan Documents.

2.6 The European Directive 2001/42/EC (SEA) requires that Development Plan Documents be subject to a strategic environmental assessment (SEA). The purpose of the SEA is to consider the likely significant effects of the Plan on the environment including issues such as population, human health, biodiversity, soil, flora, fauna, water, air, climatic factors, material assets, cultural heritage (including archaeological and built heritage) and landscape.

2.7 Table 1 below sets out the requirements of the SEA Directive and where they are covered in the SustA of the Draft SA DPD.

Environmental Report requirements	Section of this Report
a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Sections 1, 2, 3 and Scoping Report 2020
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Sections 3, 5 and Scoping Report 2020
c) the environmental characteristics of areas likely to be significantly affected;	Section 3 and Scoping Report 2020
d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (The Habitats Directive);	Section 3 and Scoping Report 2020
e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 3 and Scoping Report 2020
f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 4
g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 4
h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 4

i)	a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 4
j)	a non-technical summary of the information provided under the above headings.	Non-technical Summary (separate report)

2.8 Sustainability Appraisal extends the concept of SEA to include economic and social concerns. Under the Planning and Compulsory Purchase Act 2004, Local Authorities must undertake Sustainability Appraisal for each of their Development Plan Documents (DPDs). Sustainability Appraisal is therefore a statutory requirement for DPDs along with SEA and best practice is to incorporate the requirements of the SEA Directive into a wider Sustainability Appraisal.

2.9 A sustainability appraisal is a systematic iterative process that informs the development of a plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

Equalities Impact Assessment

2.10 An Equalities Impact Assessment (EqIA) is a tool for identifying the potential impacts (both positive and negative) that policies, services and functions may have on the key protected characteristics covered by the Equality Duty. Carrying out an EqIA supports effective decision making by enabling a good understanding of the need and differential impacts that policies may have on different groups. This will be carried out in line with the section 149 of Equality Act 2010 Public Sector Equality Duty and will assist in demonstrating compliance with the NPPF requirement to promote community cohesion.

2.11 It is important that the SustA adequately addresses equality and diversity issues. The council has an adopted approach to undertaking Equality Impact Assessments (EqIA) and this SustA seeks to integrate the principles of the EqIA across the SustA Framework. This helps to explore the impact of the proposed policy on different equalities groups, (ie. ethnicity, gender, gender re-assignment, disability, age, sexual orientation, religion or belief, socio-economic factors, marriage and civil partnership,

pregnancy and maternity, language, health). For example, whilst SustA Objective 5 specifically addresses issues of equality and diversity, other objectives also tease out equality impacts via appropriate sub-questions, for example SustA objectives 2, 3, 6. To date, feedback has been sought and actioned from the council's Equalities Panel and team.

Health and Well-being Impact

- 2.12 As with the EqIA, the Health and Well-being Impact Assessment is integrated into the SustA; an approach previously used in the preparation of Lambeth Development Plan Documents (most recently Lambeth Local Plan 2021), which was also discussed and agreed with NHS Lambeth at the time. Public Health Lambeth fed into the update and review of the SustA Framework (ie the sustainability objectives by which the Draft SA DPD will be assessed against).
- 2.13 A Health Impact Assessment screening will be carried out through the inclusion of SustA Objective 2 *Health and wellbeing* and other related objectives that impact on health. Any adverse impacts identified through this screening would then be assessed through a separate full Health Impact Assessment.

Habitat Regulations Assessment

- 2.14 The council has undertaken a Draft Habitat Regulations Assessment – Screening Analysis on the Draft Site Allocation Development Plan Document as required under European legislation. No European Sites lie wholly or partly within Lambeth Borough. Four European Sites (Wimbledon Common SAC, Richmond Park SAC, Walthamstow Reservoirs and Epping Forest (extreme southern tip only) lie partially within 15 kilometres of the Lambeth Borough boundary. The draft screening assessment on the Draft SA DPD does not identify any likely significant adverse effects on any European Site. Similarly, it is considered that the Draft SA DPD will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the Draft SA DPD.

Consultation and Approach and Influence of Sustainability Appraisal to date

- 2.15 A draft Scoping Report was made available for comment to statutory consultees Natural England, Environment Agency and Historic England. Consultation was over an eight-week period from July to September 2020. The draft Scoping Report provided a summary of the environmental, social and economic conditions in

Lambeth (baseline information) and the proposed Sustainability Appraisal Framework for the appraisal process. It built on the sustainability appraisal material included in the SustA Scoping Report for the Lambeth Local Plan 2021, in order to avoid any duplication of effort (Article 4 of SEA Directive), where necessary updating the information to reflect changes to policies, plans and programmes since the Sustainability Appraisal was undertaken on the Lambeth Local Plan 2021.

- 2.16 A summary of the responses received and the subsequent changes to the final SustA Scoping Report as a result of the consultation is included in Appendix A1 of the Scoping Report.

The Five Stages of Sustainability Appraisal

- 2.17 In order for SustA to be effective, it should be fully integrated into the plan-making process. It should inform preliminary work on the DPD and provide input at each stage when decisions are taken.
- 2.19 The SustA follows the prescribed structure for process (Table 2) as the basis of the framework while incorporating Equalities Impact Assessment (EqIA) and health impact screening. The table also sets out the Draft Site Allocations Development Plan Document process that occurs simultaneously.

Table 2: Sustainability Appraisal Methodology and Draft Site Allocations DPD preparation process

Sustainability Appraisal Process		Draft Site Allocations Development Plan Document preparation
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope 1. Identify other relevant policies, plans and programmes, and sustainability objectives 2. Collect baseline information 3. Identify sustainability issues and problems 4. Develop the sustainability appraisal framework 5. Consult the consultation bodies on the scope of the sustainability appraisal report	Pre-production: review of the proposed site allocations, engagement and evidence gathering Outcome: Scoping Report 2020

Sustainability Appraisal Process		Draft Site Allocations Development Plan Document preparation
Stage B	Developing and refining alternatives and assessing effects 1. Test the Draft SA DPD objectives against the sustainability appraisal framework 2. Develop the Draft SA DPD options including reasonable alternatives 3. Evaluate the likely effects of the Draft SA DPD and alternatives 4. Consider ways of mitigating adverse effects and maximising beneficial effects 5. Propose measures to monitor the significant effects of implementing the Draft SA DPD	Consultation on Draft Site Allocations Development Plan Document in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012). Outcome: Draft Sustainability Appraisal Report 2021 (this report)
Stage C	Preparing the Sustainability Appraisal Report	Prepare the publication version of the Site Allocations Development Plan Document
Stage D	Seek representations on the sustainability appraisal report from consultation bodies and the public	Seek representations on the publication of the Site Allocations Development Plan Document (regulation 19) from consultation bodies and the public.
		Adoption
Stage E	Post adoption reporting and monitoring 1. Prepare and publish post-adoption statement 2. Monitor significant effects of implementing the SA DPD 3. Respond to adverse effects	

2.20 This report forms the second stage (Stage B) of the Draft SustA of the Draft SA DPD and assesses and evaluate the likely effects of the Draft SA DPD and reasonable alternatives against the SustA Framework (sustainability objectives) and consider ways of mitigating any identified adverse effects and maximising beneficial effects.

Limitations of the SustA process

2.21 The SustA process is a useful way to identify potential issues and make suggestions to reduce possible negative impacts of site allocation. It also tests how identified reasonable alternatives for the site work against SustA objectives.

2.22 While the process scrutinises comprehensively, many issues are largely dependent upon implementation, and to some extent upon the policies from other development plan documents. There are some uncertainties and limitations that exist in the SustA process, which are summarised below:

- The principal source of difficulty undertaking the SustA is the reliance on the judgement of predicting and assessing the possible effects arising from a particular option. However, the SustA has been undertaken by a professional in town planning and sustainability issues. Consultation on the SustA Report is seen as adding value in allowing professionals and interested stakeholders to review the effects identified and provide alternative opinions for further consideration.
- Potential complexities in respect of predicting the impact of the SA DPD in the long term (for example uncertainties under the current difficult economic climate, aftermath of COVID-19, funding gaps for some infrastructure projects and post Brexit arrangements).
- Complexities associated with and distinguishing between and separating out the influence of the Draft SA DPD, and other Development Plan Documents from other external factors. For example, whilst specific local conditions such as air quality, carbon emissions or health could be getting worse, this could be due to various factors beyond the control of the Development Plan, and the Draft SA DPD (and other Development Plan Documents) itself may still have a positive influence in so far as planning can influence such areas.
- A further difficulty was deciding how *significant* the effects of the Draft SA DPD are. This is particularly true for sustainability objectives such as health which are influenced by a wide range of factors.

3. SUMMARY OF STAGE A: THE SUSTAINABILITY APPRAISAL FRAMEWORK

- 3.1 The SustA Scoping Report for the Draft Site Allocations Development Plan Document reviewed existing plans, programmes and sustainability objectives, set out the existing baseline and key sustainability issues; and established the SustA framework to be used in the appraisal process. This section summarises this context and sets out the SustA objectives that provide the framework for assessing the sustainability of the Site Allocations.

Stage A1: Relevant plans, policies, programmes and strategies

- 3.2 As set out in the paragraph 2.15, the SustA Scoping Report for the Draft Site Allocations Development Plan Document has relied on the SustA material included in the SustA Scoping Report for the Revised Lambeth Local Plan, in order to avoid any duplication of effort (Article 4 of SEA Directive), and where necessary updated the information to reflect changes to policies, plans and programmes since the preparation of the Revised Lambeth Local Plan was undertaken.
- 3.3 Relevant documents at local, regional, national and international level have been reviewed. The full review of programmes, plans and policies is included as Appendix 1 to the SustA Scoping Report. Appendix 1 organises these plans and policies under a number of subtopics to indicate how they relate to the SustA Framework.

Stage A2: Baseline Information

- 3.4 A baseline was collected for the SustA Scoping Report under a number of relevant indicators that were considered to provide a comprehensive picture of the borough as it is now and is projected to be in the future to measure the progress of the Draft SA DPD in achieving sustainable development.
- 3.5 The detailed baseline review for London Borough of Lambeth, particularly relating to the Draft SA DPD, is included in Appendix 2 to the SustA Scoping Report. Most information is broad and relates to the wider local authority area.

- 3.6 The baseline provides the starting point for predicting and monitoring effects, helping to identify potential sustainability, health, equality, crime and safety issues that the SustA Report will address.
- 3.7 The baseline topics and issues listed are intended to correlate as closely as possible with indicative SEA Directive (Annex 1 of the SEA Directive) and guidance headings of: population and human health, biodiversity, fauna and flora, soil, water, air, climatic factors, material assets and cultural heritage and landscape (see Table 3). There will inevitably be a degree of interrelationship between the issues.

Table 3: Baseline information and SEA Topic

Baseline information	SEA Topic Requirement
SOCIAL	
1. Location	
2. Population	Population
3. Community safety	Population
4. Health and social care	Population, human health
5. Access and services	Population, human health
6. Equality and diversity	Population, human health
7. Housing	Material assets, population
8. Education	Population
9. Liveability and Place	Population, human health, material assets, landscape, cultural heritage
ENVIRONMENTAL	
10. Built and historic environment	Landscape, cultural heritage
11. Transport and traffic	Population, air, human health, climatic factors
12. Biodiversity, habitats, priority species and Sites of Importance for Nature Conservation	Biodiversity, flora, fauna, landscape, soil, water
13. Open space	Biodiversity, flora, fauna, landscape, soil, water, climatic factors
14. Climate change and energy	Climatic factors, material assets
15. Water and flooding	Water, climatic factors
16. Recycling and waste management	Material assets, population
17. Air quality	Air, human health, climatic factors
ECONOMIC	
18. Local economy and employment	Material assets, population
19. Regeneration and efficient use of land	Material assets, population

Stage A3: Identifying key sustainability, health and equality, crime and safety issues

3.8 The key sustainability issues set out in Table 4 were identified during the SustA of the Draft Revised Lambeth Local Plan. Having reviewed the relevant plans and programmes (see Scoping Report Appendix A1), and identified baseline information (see Scoping Report Appendix A2), it is considered that the main sustainability issues, including health, equality, crime and safety issues identified during the SustA of the DRLLP remain the most relevant sustainability issues of the Draft Site Allocations DPD.

Table 4: Key Sustainability Issues for Lambeth

Lambeth key issue	Considerations
Increase the overall supply and mix of housing , including affordable housing.	Improve access to good quality housing. Amount of affordable housing. Sustainable housing. Housing mix and types. Addressing overcrowding.
Protect and enhance heritage assets , their settings and the wider historic environment as part of reinforcing local distinctiveness and place-making.	Built heritage. Archaeology and Archaeological Priority Areas Heritage at risk Designated and non-designated heritage assets including Westminster World Heritage Site Townscape and Landscape. Urban design.
Provide the essential infrastructure to support population growth.	Infrastructure provision, including healthcare services, transport, digital connectivity and facilities; and schools.
Develop mixed, cohesive, safe communities accessible to all.	Create mixed and cohesive communities. Safer communities. Accessible environments. Meeting the needs of diverse communities. Addressing social inequities. Addressing causes of Multiple Deprivation. Addressing high rates of child poverty.

Lambeth key issue	Considerations
	<p>Tackling crime.</p> <p>Tackling terrorism.</p> <p>Addressing fear of crime.</p>
<p>Provide good access to local services and community facilities within neighbourhoods.</p> <p>Increase public transport accessibility and promote walking and cycling.</p>	<p>Good local access to services, green infrastructure and facilities.</p> <p>Tackling congestion and overcrowding on services and roads.</p> <p>Increase use of public transport, cycling and walking.</p>
<p>Increase the number and variety of jobs in the local economy, including local jobs for local people.</p>	<p>Increasing jobs, particularly local jobs for local people.</p> <p>Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups.</p> <p>Tackling barriers to employment.</p> <p>Post covid-19 recovery and job retention</p> <p>Lambeth's role in London and UK economy.</p>
<p>Support the growth of key economic sectors through new business development, business retention and inward investment.</p>	<p>New business development.</p> <p>Business retention.</p> <p>Inward investment.</p> <p>Targeting key economic sectors. Addressing loss of employment land. Affordability of business space.</p> <p>Economic recovery post covid-19</p>
<p>Create viable, safe and well managed town centres.</p>	<p>Create viable, safe and well managed town centres.</p> <p>Mixed use development.</p> <p>Protection of cultural and leisure services and facilities.</p>
<p>Support the regeneration and renewal of Opportunity Areas.</p>	
<p>Reduce carbon emissions from residents, businesses, public services and buildings.</p> <p>Implement measures to help Lambeth adapt to the consequences of inevitable climate change, including flood risk management</p>	<p>Reducing CO₂ emissions.</p> <p>Promote a low carbon economy.</p> <p>Provision of climate change adaptation, including flood risk management, drought and heat risk and associated impacts.</p>
<p>Maximise the efficient use and management of resources, including water, energy and waste.</p>	<p>Efficient use and management of energy use and supply. Reducing fuel poverty.</p>

Lambeth key issue	Considerations
	<p>Efficient use and management of water: addressing increasing demand and improve the quality of water.</p> <p>Efficient management of waste: increasing recycling rates and self-sufficiency in waste disposal. Waste arisings in construction materials.</p>
Health and well-being	<p>Improving air quality (and meeting EU targets).</p> <p>Addressing health inequalities and the health needs of Lambeth's existing and new residents.</p>
Biodiversity, green infrastructure and open space	<p>Improving and enhancing biodiversity, habitats and green spaces.</p> <p>Increasing amount of green infrastructure</p>

Stage A4: Developing the Sustainability Appraisal Framework

3.9 Table 5 presents a set of 18 SustA objectives presented in the SustA scoping report, which have been based on the sustainability objectives used for the SustA on the Draft Revised Lambeth Local Plan, derived from a review of relevant plans and programmes and baseline collection and key sustainability issues in Lambeth.

Table 5: Sustainability Appraisal framework

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
SOCIAL						
1	Crime and safety. Ensuring safe communities with reduced crime and disorder.	1.1 Reduce the opportunities to commit crime and engage in antisocial behaviour?	√			Population
		1.2 Create the conditions for communities to develop which will support a reduction in crime and the fear of crime?	√			
		1.3 Encourage walking and cycling, for instance by reducing likelihood of traffic accidents to pedestrians and cyclists?	√		√	
		1.4 Help address the fear of crime as well as crime itself?	√			
		1.5 Reduce Lambeth's vulnerability to major challenges such as climate change and water shortages?	√		√	
		1.6 Reduce Lambeth's vulnerability to terrorist action?	√			
2	Good health and wellbeing. Promote a healthy community, including reducing health inequalities and the causes of ill health.	2.1 Protect health and wellbeing and ensure the environment is safe for all and all ages?	√	√	√	Population, Human health
		2.2 Reduce poverty, including child poverty and the impact of income inequality?	√	√	√	
		2.3 Help reduce health inequalities?	√	√	√	
		2.4 Help improve mental, emotional and physical health, and wellbeing?	√		√	
		2.5 Help people be healthier for longer?	√	√	√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
		2.6 Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive?	√		√	
		2.7 Encourage the retention and development of key services (e.g. GP practices, pharmacies, youth clubs and community facilities, accessible shopping, community and leisure facilities)?	√		√	
		2.8 Help people to live an inclusive and active lifestyle?	√	√	√	
		2.9 Promote a sense of wellbeing?	√	√	√	
		2.10 Reduce overcrowding including in the private renting sector?	√		√	
		2.11 Prevent heat island effect?	√		√	
		2.12 Help promote social cohesion?	√		√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
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.	3.1 Improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel? Including: <ul style="list-style-type: none"> ○ Schools ○ Nurseries ○ GPs and hospitals ○ Libraries ○ Places of worship ○ Food shops (especially those selling fresh, healthy food) ○ Community centres ○ Children's play areas ○ Sports and recreation facilities ○ Open spaces and wildlife habitats ○ Police and emergency services ○ Banking facilities and post offices 	√	√	√	Population, Human Health
		3.2 Help older, disabled and vulnerable people live independently and have control over their lives?	√	√	√	
4	Provision of essential infrastructure. To ensure that the necessary infrastructure is	4.1 Ensure the appropriate infrastructure needed to be in place or planned before redeveloping the site, in particular: <ul style="list-style-type: none"> ○ water and sewerage infrastructure ○ health 'infrastructure' (facilities and services) ○ schools ○ green infrastructure 	√	√	√	Population, Human Health, Material Assets

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
	planned or in place to meet current or likely future demands.	<ul style="list-style-type: none"> ○ flood defences ○ transport ○ decentralised heating 				
		4.2 Ensure development to be designed to connect wherever reasonably possible to existing or future planned infrastructure?	√			
		4.3 Ensure that development and operations will not adversely affect the existing infrastructure?	√			
		4.4 Ensure that development proposals provide or fund local improvements to mitigate the impact of the development and/or additional facilities, including essential infrastructure of the borough?	√			
5	Equality and diversity. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	5.1 Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?	√	√		Human health, Population
		5.2 Address housing, cultural, social and employment needs of those with protected characteristics?	√	√	√	
		5.3 Provide adequate and equal accessibility for all to buildings and services, in particular for older and disabled people?	√	√	√	
		5.4 Encourage development opportunities in those areas in need of economic development?	√	√	√	
		5.5 Promote a culture of equity, fairness and respect for people and the environment?	√	√	√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
		5.6 Reduce poverty and social exclusion?	√	√	√	
		5.7 Create inclusive, safe, resilient and sustainable developments?	√	√	√	
6	Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	6.1 Promote increased supply of housing to meet local needs?	√	√	√	Population, Human Health, Material assets
		6.2 Protect and increase the range and affordability of housing (taking into account different requirements and preferences of size, type and tenure) to meet affordable housing targets?	√	√	√	
		6.3 Provide the mix and type of housing for people, including families, on moderate and lower incomes?	√	√	√	
		6.4 Encourage development at an appropriate density, standard (including sustainable housing standards), size, mix and amenity?	√		√	
		6.5 Provide Lambeth residents with more opportunities for better quality homes and healthy lifestyle?	√	√	√	
7	Liveability and place. To design and sustain liveable, mixed-use physical and social	7.1 Ensure that the amenity of neighbours is not unduly impacted?	√		√	Population, Human Health, Material Assets,
		7.2 To improve amenity by minimising the impacts associated with development?	√		√	
		7.3 Protect and enhance the quality and quantity of open space and the public realm?	√		√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
	environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	7.4 Ensure that development and operations will not affect noise sensitive uses and will reduce other unpleasant environmental factors (e.g. fumes)?	√		√	Landscape, Cultural Heritage (including architectural and archaeological heritage)
		7.5 Promote child-friendly buildings and places?	√	√	√	
		7.6 Help all Lambeth communities feel they are valued and are part of their neighbourhoods?	√	√	√	
		7.7 Promote wellbeing and help to make people feel positive about the area where they live?	√	√	√	
		7.8 Help people lead environmentally sustainable lives?	√		√	
		7.9 Prevent overcrowding in public space by ensuring enough space for public movement?	√		√	
		7.10 Create an environment that that facilitates community interaction e.g. communal spaces	√		√	
8	Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality	8.1 Protect, conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?	√			Landscape, Cultural Heritage (including architectural and archaeological heritage)
		8.2 Enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals)?	√	√		
		8.3 Protect and enhance the townscape/cityscape character, including historical, archaeological and cultural value/potential and its contribution to local distinctiveness?	√	√		

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
	design and protection of open space, valued views and designated and non-designated historic assets.	8.4 Respect visual amenity and the spatial diversity of communities?	√			
		8.5 Increase access to, enjoyment of and understanding of, historical, archaeological and cultural sites, features and areas?	√	√		
		8.6 Protect valued views?	√			
		8.7 Identify locations where tall building are acceptable?	√		√	
		8.8 Aspire to a range of buildings and architecture that reflect the character and cultural diversity of the borough?	√	√		
		8.9 Protect, enhance or create open space?	√	√	√	
		8.10 Ensure enhancement of the public realm and local distinctiveness?	√		√	
		8.11 Encourage the use of sustainable design and construction methods while conserving or enhancing the historic environment?	√		√	
9	Transport and travel. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the	9.1 Reduce overall need for people to travel by improving their access to local services, jobs, leisure and amenities?	√	√	√	Population, Air, Human health, Climatic factors
		9.2 Encourage a modal shift to more sustainable forms of travel: walking, cycling and public transport as well as encourage efficiency (e.g. through car sharing)?	√		√	
		9.3 Integrate new development, especially residential development, with sustainable transport choices?	√		√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
	private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	9.4 Improve accessibility to work by public transport, walking and cycling?	√	√	√	
ENVIROMENTAL						
10	Biodiversity. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	10.1 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?	√			Biodiversity, Flora, Fauna, Landscape, Soil, Water, Climatic Factors
		10.2 Help to protect, increase/improve biodiversity and open space in the borough?	√		√	
		10.3 Help to protect and enhance access to open space and improve the quality of publicly accessible green space?	√		√	
		10.4 Protect and provide for the protection and planting of more trees in the borough?	√		√	
		10.5 Conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national, London or Lambeth priority species and designated sites)?	√		√	
		10.6 Bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens?	√		√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
		10.7 Promote a network of green infrastructure?	√		√	
11	Green infrastructure. To create, manage and enhance green infrastructure.	11.1 Help to protect, increase/improve existing green infrastructure or open spaces?	√		√	Biodiversity, Flora, Fauna, Landscape, Soil, Water, Climatic Factors
		11.2 Enhance/create good quality and accessible green infrastructure or open spaces?	√	√	√	
		11.3 Promote increased access to green infrastructure where appropriate?	√		√	
12	Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life	12.1 Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere?	√		√	Climatic Factors, Materials Assets
		12.2 Increase the proportion of energy both produced and used from renewable and sustainable resources?	√		√	
		12.3 Encourage energy efficiency through passive design measures?	√	√	√	
		12.4 Reduce the impacts of climate change e.g. urban heat island effect, flooding and drought?	√		√	
		12.5 Ensure adaptation to the future impacts of climate change?	√		√	
		12.6 Help ensure new and retrofitted development and infrastructure is located, designed and constructed to withstand the effects of climate change over its design life?	√		√	
		12.7 Promote high quality, appropriate design and sustainable construction methods?	√		√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
	of the development.	12.8 Promote high standards of energy and environmental performance for new and existing buildings?	√	√	√	
		12.9 Minimise embedded carbon in new buildings and development?	√		√	
		12.10 Contribute to provision of affordable and clean energy?	√		√	
		12.11 Incorporate natural ventilation rather than mechanical ventilation where possible?	√		√	
13	Water resources and flood risk management. To protect and manage water resources (including groundwater) and to minimise flood risk.	13.1 Promote the sustainable use of water resources and reduce piped water consumption e.g. through reducing demand and encouraging grey water recycling in households?	√		√	Water, Climatic Factors
		13.2 Encourage development that incorporates sustainable urban drainage?	√			
		13.3 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?	√		√	
14	Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising	14.1 Minimise the production of waste, maximise recycling and reuse during development construction and/or operation, and decrease the demand for raw materials from unsustainable sources e.g. through reusing demolition material onsite and using products made from recycled materials?	√		√	Population, Material Assets

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
	the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	14.2 Make waste avoidance, reuse and recycling easy for residents and visitors?	√		√	
		14.3 Enable safe storage of waste and recycling, convenient for both residents and collectors?	√		√	
15	Air quality. To improve air quality and limit exposure to poor air quality.	15.1 Contribute to an improvement of air quality?	√		√	Human health, Air, Climatic Factors
		15.2 Use the location and form of buildings to aid dispersion and separate emission sources from people?	√		√	
		15.3 Design out places of exposure or features that tend towards accumulation rather than dispersal of pollutants?	√		√	
		15.4 Eliminate or reduce the impact of sources?	√		√	
		15.5 Reduce emissions of greenhouse gases and exposure to harmful emissions?	√		√	
		15.6 Reduce emissions of PM10, NOx and ozone depleting substances?	√		√	
		15.7 Help to achieve national and international standards for air quality (e.g. those set out in the Air Quality Regulations 2010) as well as local air quality management targets (Lambeth's Air Quality Action Plan 2017 - 2022)?	√		√	
		15.8 Support the planting of trees?	√		√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
		15.9 Promote the 'transport hierarchy' and encourage the use of alternative modes of transport to the private car?	√		√	
		15.10 Incorporate natural ventilation where appropriate?	√		√	
ECONOMIC						
16	Local economy. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	16.1 Improve the resilience of business and the economy e.g. through supporting existing local business, diversification, corporate social responsibility, accommodating low income workers, supporting and driving the marketplace?	√	√	√	Population, Material Assets
		16.2 Support and prevent loss of local businesses?	√	√	√	
		16.3 Accommodate new and expanding businesses?	√		√	
		16.4 Encourage new investment in the local economy and promote development opportunities for employment?	√	√	√	
		16.5 Focus growth in growth areas and other highly accessible locations?	√	√	√	
		16.6 Contribute to sustainable tourism?	√			
		16.7 Promote green jobs & sustainable & inclusive growth?	√	√	√	
		16.8 Bridge the digital divide?	√			
		16.9 Promote responsible consumption & production?	√		√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
		16.10 Supporting decent work and economic growth for all?	√	√	√	
17	Regeneration and efficient use of land. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	17.1 Make best use of scarce land resource and encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair?	√			Material Assets, Soil
		17.2 Ensure efficient use of land through maximising densities exploring a variety of building typologies, where appropriate?	√		√	
		17.3 Promote the efficient, innovative and multifunctional use of land?	√		√	
		17.4 Protect the Borough's soil resource?	√			
18	Tackling worklessness. Increase the amount of and access to employment generating activities and offer all	18.1 Improve accessibility to employment, especially for local people?	√	√	√	Population, Material Assets
		18.2 Protect local employment land and uses?	√	√	√	
		18.3 Provide additional housing near places of work?	√	√	√	

Ref.	Draft SustA objective	Appraisal prompt questions Will the Site Allocations Policy...	SA/SEA	EqIA	HIA	SEA Directive topic requirement
	residents the opportunity for rewarding, well-located and satisfying employment.					

Stage A5: Consulting relevant authorities on the scope of the Sustainability Appraisal

- 3.10 In accordance with Regulation 12(5) of the SEA Regulations, the draft SustA Scoping Report underwent public consultation for an eight-week period from the 8 July to 2 September 2020. The statutory SEA bodies (Natural England, the Environment Agency and Historic England) were directly consulted. Because the SustA has a broader scope than environmental issues, as well as consulting with the statutory bodies the council also sent this report to neighbouring boroughs, Public Health Lambeth, and the GLA, and was published on the council's website to invite wider feedback.
- 3.11 A total of 5 responses were received of which two responded they had no comments to make. A summary of the responses and how the Scoping Report (including sustainability framework) has been updated to take account of the comments received on the draft Scoping Report is included at Appendix A3 of the Final Scoping Report.

4. STAGE B: DEVELOPING AND REFINING ALTERNATIVES AND ASSESSING EFFECTS

4.1 At this stage in plan preparation, a broad assessment has been carried out in line with the SustA Framework of the 18 objectives and their prompt questions (refer to Table 5). Each proposed draft site allocation policy and the reasonable alternatives have been appraised against the 18 sustainability objectives.

Stage B1: Testing the objectives against the sustainability appraisal framework

4.2 The Draft SA DPD states that key spatial planning objectives have been factored in and identified for each site. This includes strategic place-making and contribution to implementation of the relevant policy for Places and Neighbourhoods; inclusion, accessibility and permeability in the public realm; healthy routes and active travel; community safety; townscape and design quality, including contribution to local distinctiveness; and urban greening. Accordingly, these are appraised below for each site.

Stage B2: Developing options including reasonable alternatives

4.3 The NPPG ([Paragraph: 018 Reference ID: 11-018-20140306](#)) requires the sustainability appraisal to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in [schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#);
- as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;

- provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.

4.4 The SEA Directive requires the environmental report to consider '*reasonable alternatives taking into account the objectives and geographical scale of the plan or programme*' and give '*an outline of the reasons for selecting the alternatives dealt with*' (Article 5.1 and Annex I (h)). The aim of developing and appraising different options is to compare the sustainability impacts of alternative ways of addressing and achieving the same objectives. The options should be sufficiently distinct to highlight the different sustainability implications of each in order to allow for meaningful comparisons.

Developing reasonable alternatives

4.5 Table 6 below demonstrates that the reasonable alternatives were derived in a systematic manner in the context of the planning policies that will apply.

Table 6: Generation of reasonable alternatives

Site	Proposed allocation	Existing uses	Land use designations and policies applying to existing uses	Land use policies applying to potential uses	Land use parameters / policy requirements	Notes	Reasonable alternatives
<p>SA1 Royal Street SE1</p> <p>Site is currently allocated as Site 1 of the Local Plan.</p>	<p>Facilities serving MedTech hub. New offices with affordable workspace. Replacement residential with 35% affordable housing. Cultural uses to contribute to evolution of South Bank and Waterloo cultural cluster</p>	<p>Residential - 129 units total, not affordable housing</p> <p>Offices – 18885sqm GEA</p> <p>Car park</p> <p>Railway arches</p> <p>Various meanwhile temporary uses: community Farm, Small scale start-up creative businesses (in Paradise Yard)</p>	<p><u>Designations</u></p> <ul style="list-style-type: none"> Waterloo Opportunity Area Central Activities Zone: within the CAZ health cluster; the railway arches only fall within the Waterloo CAZ retail cluster Thames Policy Area South Bank and Waterloo neighbourhood area <p><u>London Plan policies</u></p> <p>SD1 SD4 SD5 H8 HC5 S1 – S2 E1</p>	<p><u>London Plan</u></p> <p>SD1 SD4 SD5 H1 H4 – H6 H8 H11 H15 HC5 E1 E3</p> <p><u>Local Plan</u></p> <p>H1 – H5 H12</p> <p>ED1 ED2 ED4 ED6 ED7 ED13 ED14</p> <p>S1-S2</p> <p>PN1</p>	<ul style="list-style-type: none"> No loss office Affordable workspace 10% of uplift in office space at 50% reduction Include proportion of flexible office space for small businesses Replace quantum of residential including affordable housing at 35% threshold Retail not a primary use given most of sites not in the CAZ retail cluster; and need to consider impact on nearby Lower Marsh/The Cut 	<p>No requirement to replace community uses as they are meanwhile temporary uses</p>	<ol style="list-style-type: none"> Replacement residential and office, with additional office to support MedTech Hub, plus flexible ground floor E Class uses Replacement residential and office, with additional housing, plus flexible ground floor E Class uses

			<u>Local Plan policies</u> H3 ED1 ED4 S1-S2 <u>PN1</u>		special policy area • CAZ strategic functions, including promotion of CAZ specialist health cluster		
SA2 St Thomas' Hospital SE1	Hospital and ancillary uses. Reprovision of Florence Nightingale Museum on site or at an appropriate alternative location	Hospital Florence Nightingale Museum	<u>Designations</u> Waterloo Opportunity Area CAZ CAZ specialist health cluster <u>London Plan policies</u> SD1 SD4 SD5 HC5 S1 – S2 <u>Local Plan policies</u> S1 ED13	<u>London Plan</u> SD1 SD4 SD5 HC5 S1 – S2 <u>Local Plan</u> ED13 S1 - S2 PN1	• CAZ strategic functions, including promotion of CAZ specialist health cluster • Replacement cultural facilities • Replacement healthcare facilities		1. Reconfiguration of hospital facilities to optimise capacity for clinical use and reprovision of Florence Nightingale Museum (no RAs as no scope or proposal to introduce other uses)
SA3 35-37 and Car Park Leigham Court Road SW16	Active frontage ground floor onto Leigham Court Road with commercial space within Class E or	Council owned car park and public toilets	<u>Designations</u> Car park outside town centre Public toilets within town centre boundary	<u>London Plan</u> H1 H4-H6 H11 H15 – H16 SD6 – SD7 E1	• Affordable housing – 50% threshold as public land • Office within town centre boundary (no	Public sector land	1. Active frontage ground floor within town centre boundary with town centre uses above plus residential to rear of site

	residential above and new housing to the rear		but not in primary shopping area <u>London Plan policies</u> SD6 – SD7 <u>Local Plan policies</u> ED7	<u>Local Plan</u> H1 H2 H4-H5 H7 H12 – H13 ED1 ED7 ED14 PN4	affordable workspace requirement in this location) • Other main town centre uses, in accordance with PN4 (flexible Class E outside primary shopping area); active frontage at ground floor on main road within town centre • Front could be suitable for small hotel (but not back b/c not in town centre) • No policy requirement to reprovide car park or toilets		2. Active frontage ground floor within town centre boundary plus residential above and residential to rear of site
SA7 6-12 Kennington Lane and Wooden Spoon House	Workspace to retain industrial floorspace capacity, replacement community use and residential	6-12 Kennington Lane – 1206sqm GIA floorspace plus separate yard in use as a builders' merchant	<u>Designations</u> None. Not in KIBA (therefore is non-designated industrial land) The site is not in an Opportunity	<u>London Plan</u> H1 H4-H6 D13 E2 E4 E7 S1 – S2 <u>Local Plan</u>	<ul style="list-style-type: none"> • No net loss of industrial and intensification of industrial capacity • Potential for residential • 50% AH threshold if loss of 	Multiple landowners, alternatives need to consider both comprehensive redevelopment and separate redevelopment	<ol style="list-style-type: none"> 1. Workspace to reprovide industrial capacity, replacement community use and residential 2. Workspace to provide greater industrial capacity with replacement

		<p>Christ the Redeemer Building – 650sqm GIA, four storey building that stands within the yard fronting Kennington Lane (vacant but previously operating as a community use)</p> <p>Wooden Spoon House – approx. 2800sqm GIA medical services with ancillary office space and facilities</p>	<p>Area, the Central Activities Zone or a town centre.</p> <p>Site within KOV neighbourhood area</p> <p><u>London Plan policies</u> E2 E4 E7 S1</p> <p><u>Local Plan policies</u> ED4 S1 – S2</p>	<p>H1 H2 H4 – H5 H7 H12 H13 ED4 S1 S2 PN8</p>	<p>industrial capacity</p> <ul style="list-style-type: none"> • No hotel • No shops, food and drink or office use 	of individual parcels	<p>community uses and residential</p> <p>3. Reprovision of community use of Wooden Spoon House onsite vs reprovision of community use elsewhere in the borough.</p>
SA8 110 Stamford Street SE1	Community/office floorspace at ground floor and residential above	vacant	<p><u>Designations</u></p> <ul style="list-style-type: none"> • Waterloo Opportunity Area • Central Activities Zone • South Bank and Waterloo neighbourhood area <p><u>London Plan policies</u></p>	<p><u>London Plan</u> SD1 SD4 SD5 H1 H4 – H6 H11 H15 – H16 HC5A(5) HC6B(1) E1 E3 E10B</p>	<ul style="list-style-type: none"> • Affordable workspace 10% at 50% reduction of office proposed. • CAZ strategic functions • Waterloo OA – housing and jobs targets • Affordable housing for 	Site not considered big enough for a hotel and site is in a predominately residential neighbourhood.	<p>1. Provide residential and office</p> <p>2. Provide residential and community use</p>

			SD1 SD4 <u>Local Plan policies</u> PN1	<u>Local Plan</u> H1 H2 H4 – H5 H7 H12 H13 ED1 ED2 ED13 ED14 S2 PN1 <u>Neighbourhood plan</u> P12	any residential element, threshold level <ul style="list-style-type: none">• Active frontage required •		
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground SE1 Currently within Site 9 of the Local Plan.	Offices and/or workspace, retail/food and drink uses, cultural uses and residential	Gabriel's Wharf: shops, food and drink and cultural uses (approx. 906sqm GIA) Princes Wharf: Former TV studio used in association with the former ITV studios adjacent at 72 Upper Ground (3,189sqm GIA)	<u>Designations</u> <ul style="list-style-type: none">• Waterloo Opportunity Area• Central Activities Zone• South Bank/Bankside Strategic Cultural Area• Thames Policy Area• South Bank and Waterloo neighbourhood area <u>London Plan policies</u> SD1 SD4	<u>London Plan</u> SD1 SD4 SD5 H1 H4 – H6 H11 H15 HC5 HC6B(1) E1 E3 E10B <u>Local Plan</u> H1 H2 H4-H5 H7 H8 H12	<ul style="list-style-type: none">• Affordable workspace - 10% at 50% reduction on uplift on office floorspace.• CAZ strategic functions• Waterloo OA – housing and jobs targets• Include proportion of flexible office space for small businesses• Active frontage required	Hotel use is not considered a reasonable alternative at this site given the Strategic Cultural Area designation and predominately residential neighbourhood.	1. Residential plus re-provision of existing uses: cultural, retail and food and drink 2. Residential plus offices and/or workspace and replacement cultural, retail and food and drink floorspace

			SD5 HC5A(4) E10B <u>Local Plan policies</u> ED1 ED13 PN1	H13 ED1 ED2 ED13 ED14 PN1 <u>Neighbourhood plan</u> P12	<ul style="list-style-type: none"> Affordable housing for any residential element, threshold level 		
SA17 330-336 Brixton Road SW9	Replacement office and community floorspace of equivalent or better functionality, new light industrial workspace appropriate to Brixton Creative Enterprise Zone, new self-contained housing.	<p>330 Brixton Road – petrol station and premises (552sqm GIA)</p> <p>Land to rear of 330-334 Brixton Road – light industrial workspace (1289sqm GIA)</p> <p>332-334 Brixton Road – medical services with ancillary office floorspace (563sqm GIA)</p> <p>336 Brixton Road – office and associated</p>	<p><u>Designations</u></p> <p>Not within town centre</p> <p>Not within KIBA</p> <p>Brixton CEZ</p> <p>336 Brixton Road identified as Artists Workspace (Block 336) within the Mayor’s Cultural Infrastructure Map and Cultural Infrastructure List in Lambeth March 2020.</p> <p><u>London Plan policies</u> E1 – E2 E4 E7 S1 – S2 HC5</p>	<p><u>London Plan</u> H1 H4-H6 H11 H15-H16 D13 E1-E4 E7 SD7 HC5 S1 – S2</p> <p><u>Local Plan</u> H1 H2 H4-H5 H7 H12 H13 ED1 ED4 ED13 S1 – S2 PN3</p>	<ul style="list-style-type: none"> No policy protection of petrol station No net loss of industrial floorspace capacity Reprovision of offices Reprovision of community facility Reprovision of cultural space No hotel Affordable housing at 50% threshold on public sector land or 35% elsewhere 	Multiple landowners, alternatives need to consider both comprehensive redevelopment and separate redevelopment of individual parcels	<ol style="list-style-type: none"> Reprovision of community, light industrial and offices but no residential Reprovision of community, light industrial and office uses plus residential Reprovision of community, light industrial use and provide more workspace than currently exists, plus residential

		ancillary floorspace (3553sqm GIA)	<u>Local Plan policies</u> ED1 ED4 ED13 S1				
SA18 286-362 Norwood Road SE27	Flexible workspace, community floorspace, shops and food and drink uses plus residential	80 residential units Retail floorspace 4152sqm GIA Office floorspace 57sqm GIA Industrial floorspace 2605sqm GIA Church 440sqm GIA Petrol station 233sqm GIA Pub 318sqm GIA Art studio 263sqm GIA	<u>Designations</u> West Norwood District Centre Norwood Road frontage in West Norwood Primary Shopping Area Not in KIBA (therefore non-designated industrial land) <u>London Plan policies</u> SD6-SD7 E1 E2 E4 E7 E9 S1 H8 <u>Local Plan policies</u> H3	<u>London Plan</u> H1 H4-H6 H11 H15 D13 E2 E4 E7 SD6-SD7 <u>Local Plan</u> H1 – H5 H12 ED1 ED4 ED7 – ED8 ED13 ED14 S1 – S2 PN7	<ul style="list-style-type: none"> No policy protection petrol station PN7(f)(i) promotes mixed-use development including housing; and new commercial floorspace must provide flexible workspace to provide opportunities for creative and digital industries. Frontage must be in town centre uses because in PSA – Shopping safeguarded 	Multiple landowners, alternatives need to consider both comprehensive redevelopment and separate redevelopment of individual parcels Parts in Council ownership are public land	<ol style="list-style-type: none"> Reprovide existing quantum of commercial and community uses plus additional residential Other town centre uses/workspace plus more commercial/community and less residential Other town centre uses/workspace plus less commercial/community and more residential

		Fast food takeaways and restaurants 398sqm GIA	ED4 ED7 – ED9 ED13 S1 – S2 PN7		and encouraged; within PSA, all ground floor units in active-frontage uses and no fewer than 50 per cent of ground floor units are to be in shop use. For centre as a whole, no more than 15 per cent and no more than 2 in 5 consecutive hot food takeaway uses. No more betting shops in the town centre. <ul style="list-style-type: none"> • No net loss of light industrial • Hotel supported in principle • Office supported in principle • Reprovision of community space 		
--	--	---	--	--	--	--	--

					<ul style="list-style-type: none"> Affordable housing – 35% threshold on private sector land 50% on public land 		
SA19 Knolly's Yard	Workspace to intensify industrial floorspace capacity, and residential	Industrial floorspace 884sqm GIA plus approx. 9000sqm of associated yard space	<u>Designations</u> KIBA with potential for industrial intensification and co-location. Not in town centre SINC 10 surrounds and falls partly within the site <u>London Plan policies</u> E2 E4 E7 <u>Local Plan policies</u> ED3 EN1	<u>London Plan</u> H1 H4-H6 D13 E2 E4 E7 <u>Local Plan</u> H1 H2 H4 – H5 H12 ED3 PN7	<ul style="list-style-type: none"> Intensification of industrial capacity Potential for residential 50% AH threshold because site is in public ownership No main town centres uses (no office, no hotel, no retail or food and drink uses) 	Requirement to provide improved vehicular and pedestrian access to the site – exceptional costs	<ol style="list-style-type: none"> Industrial intensification only with no residential Industrial intensification with residential
SA20 Tesco, 13 Acre Lane SW2	Replacement supermarket and self-contained residential units	Supermarket (approx. 2500sqm net sales area)	<u>Designations</u> Major Town Centre Boundary – Brixton	<u>London Plan</u> H1 H4-H6 H11 H15 – H16	<ul style="list-style-type: none"> Hotel permissible 	Land is leased by Tesco and reprovision of supermarket is	<ol style="list-style-type: none"> Reprovide supermarket with no other uses

		and carpark (229 spaces)	(Not in Primary Shopping Area and not in new Evening Economy Management Zone) Brixton Creative Enterprise Zone <u>London Plan policies</u> SD6- SD7 E9 <u>Local Plan policies</u> ED7 PN3	SD6 – SD7 E1 – E4 E9 <u>Local Plan</u> H1 H2 H4-H5 H7 H12 H13 ED7 ED1 ED2 ED4 ED14 PN3	<ul style="list-style-type: none"> • Main town centre uses within Class E • Affordable housing 35% threshold • Affordable workspace 10% at either 65% or 50% reduction depending on sqm NIA 	known to be lessee's priority	<ol style="list-style-type: none"> 2. Reprovide supermarket plus residential 3. Reprovide supermarket plus other town centre uses
SA21 51-65 Effra Road SW2	Replacement space for existing community uses, new light industrial workspace appropriate to Brixton Creative Enterprise Zone and new self-contained residential units.	Brixton Unitary Church – approx. 400sqm GIA community floorspace Mosaic Centre – approx. 700sqm GIA community floorspace Effra Road retail Park – 3456sqm GIA	<u>Designations</u> Brixton CEZ Not within town centre <u>London Plan policies</u> S1-S2 H8 H12 – H13 E9 <u>Local Plan policies</u> H3 H8 S1	<u>London Plan</u> H1 H4-H6 H11 H15-H16 S1 – S2 D13 E2 E3 E4 <u>Local Plan</u> H1-H5 H7 H8 H12 H13 S1	<ul style="list-style-type: none"> • No hotel • No offices • No shops, food or drink uses • Reprovision of community facility floorspace • Equivalent quantum of residential floorspace reprovided • Affordable housing at 50% threshold for land in public ownership; 	Multiple landowners (private and public), alternatives need to consider both comprehensive redevelopment and separate redevelopment of individual parcels.	<ol style="list-style-type: none"> 1. Replacement space for community uses, new light industrial workspace, new residential units. 2. Replacement space for existing community uses and new residential units.

		<p>retail floorspace</p> <p>Fitch Court – 35 self-contained residential units (re-provided as part of Somerleyton Road development</p> <p>63 Effra Road – 2 self-contained residential units</p> <p>Massey Mews – private road providing access to separate housing development rear of church.</p>		<p>S2 ED4 PN3</p>	<p>35% in private ownership</p>		
<p>SA22 1&3 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street</p>	<p>Workspace to at least reprovide industrial floorspace capacity (calculated at</p>	<p>Light industrial floorspace – 960sqm GIA</p>	<p><u>Designations</u> Site is a non-designated industrial site. Creative Enterprise Zone</p>	<p><u>London Plan</u> H1 H4-H6 H11 H15-H16 D13 E2</p>	<ul style="list-style-type: none"> • No net loss of industrial and intensification of industrial capacity (ie 1400sqm required at 		<ol style="list-style-type: none"> 1. Workspace to reprovide industrial capacity 2. Workspace to reprovide industrial

	65% plot ratio), and residential	Retail floorspace – 32sqm GIA	(outside Brixton town centre bdy) Site not within Loughborough Junction local centre <u>London Plan policies</u> E2 E4 E7 <u>Local Plan policies</u> ED4	E4 E7 <u>Local Plan</u> H1 H2 H4-H5 H7 H12 H13 ED4 ED7 PN10	65% plot ratio) • Potential for residential • 50% AH threshold if loss of industrial capacity • No hotel • No shops, food and drink or office uses • Include workspace for creative industries given CEZ location		capacity and residential 3. Workspace to provide greater industrial capacity and residential
SA23 Coldharbour Lane/Herne Hill Road	Active frontage at ground floor, community uses (replacement place of worship), workspace, and residential	Community use – place of worship 1058sqm GIA	<u>Designations</u> Most of site within Loughborough Junction Local Centre (except railway arches /south part of site leading to Hardess/Well Fit streets) Creative Enterprise Zone (outside Brixton town centre bdy)	<u>London Plan</u> H1 H4-H6 H11 H15-H16 D13 E2-E4 SD6-SD7 <u>Local Plan</u> H1 H2 H4-H5 H7 H12 H13 ED11 ED4	• Main town centre uses within Class E • Active frontage uses at ground floor • Reprovide community use • Hotel would be supported • Affordable housing 35% • If office proposed as part of active frontage		1. Active frontage ground floor with replacement community uses plus residential within local centre boundary, plus workspace outside the centre and residential 2. Active frontage ground floor with replacement community uses plus other town centre uses within local centre boundary, plus workspace outside the centre.

			<u>London Plan policies</u> S1 <u>Local Plan policies</u> S1 PN10	ED7 S1 – S2 PN10 PN3(e)	Class E – affordable workspace of 10% required		
SA24 Kings College Hospital Estate, Denmark Hill	Hospital and ancillary uses, medical services. Change of use from business and storage use to hospital and associated uses within King’s Business Park (KIBA) will be supported to enable reconfiguration and optimisation of the hospital estate for clinical service provision and associated research and development activity	Hospital and associated ancillary uses King’s Business Park (129-131 Coldharbour Lane) – business units used by the hospital for administration and storage Safeguarded waste site used for transfer of clinical waste.	<u>Designations</u> King’s Business Park within the Coldharbour Lane Estate and Bengeworth Road Depot Key Industrial Business Area (KIBA) <u>London Plan policies</u> S1 S2 E2 E4 E7 SI9 <u>Local Plan policies</u> ED3 S1 EN7	<u>London Plan policies</u> S1 S2 E2 E4 E7 SI9 <u>Local Plan policies</u> D3 S1 - S2 EN7	<ul style="list-style-type: none"> • Reprovide community use • No loss of industrial floorspace capacity within the KIBA • No loss of waste management capacity 	Hospital trust are concerned that the KIBA designation constrains their potential to optimise clinical capacity across their land holding	<ol style="list-style-type: none"> 1. Optimise capacity for clinical uses across the site, including in the KIBA (with no loss of waste management capacity) 2. Optimise capacity for clinical uses across the site but with industrial uses only within the KIBA (with no loss of waste management capacity)

Appraising reasonable alternatives

- 4.6 The reasonable alternatives appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives / issues identified in the scoping report. Effects are predicted taking into account the criteria presented within SEA Regulations. As such, account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for cumulative effects is also considered.
- 4.7 An appraisal of the reasonable alternatives for each of the sites has been undertaken and is provided below.

SA1: Royal Street, SE1

Reasonable Alternative 1: Replacement residential and office, with additional office to support MedTech Hub plus flexible ground floor E Class uses

Reasonable Alternatives 2: Replacement residential and office, with additional residential, plus flexible ground floor E Class uses

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objective	Score RA1	Score RA2
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	++	++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++	+ / ++
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.	++	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	+ / ++	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.		
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.		
11. To create, manage and enhance green infrastructure.		
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.		
13. To protect and manage water resources (including groundwater) and to minimise flood risk.		
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.		
15. To improve air quality and limit exposure to poor air quality.		
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	++	+
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	++	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++	+

Summary appraisal of Reasonable Alternatives (RAs)

Provision of replacement office at the site enables increased likelihood of continued activity during the weekdays which will help with passive surveillance and improved feelings of safety and security, so both RAs score well on this. Office floorspace will also result in benefits to the local economy and offer opportunity for employment and employment generating activities in an area that has exceptional public transport accessibility. Therefore, both RAs score positively in this regard. RA1 however will result in additional office floorspace to support the MedTech Hub (more positive effects on SustA objective 2) and therefore policy ED2 will apply, and affordable workspace will be required. RA2 will not trigger this requirement and therefore scores less positively for SustA objectives 5, 16 and 18.

Both RAs offer residential, although RA2 seeks to deliver more residential than the existing quantum on-site, and therefore would score more positively against SustA objective 6. However, both RAs will be expected to deliver 35% affordable housing.

Both options involved flexible ground floor Class E uses, and it is considered in this location this will contribute positively to achieving SustA Objective 7 so long as the necessary assessment of impact on the nearby Lower Marsh special policy area is fully addressed.

The site is in an excellent location with easy access to key services and facilities including for example shopping areas, river frontage, cultural activities in the area, local green spaces, public transport, employment areas and other healthcare. On the one hand RA2 would enable more people to benefit as residents from its location with the exceptional public transport accessibility where national rail, tube and bus services can be accessed, river commuter transport, together with easy access to the amenities of the central activities zone (CAZ), London city and social infrastructure such as St Thomas's Hospital. On the other hand, the accessibility of the site makes it easy for others to commute to for work, plus there are significant benefits for health and research and development (at all scales from local to national and international) for enhancing the MedTech Hub (RA1). Both alternatives score positively with regards to SustA objective 9.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA2: St Thomas' Hospital, SE1

Reasonable Alternative 1: Reconfiguration of hospital facilities to optimise capacity for clinical use and re-provision of Florence Nightingale Museum.

No other RA as no scope or proposal to introduce other uses at this site.

The reasonable alternative proposed involves land-use only and does not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objectives	Score RA1
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++
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.	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	0
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	
11. To create, manage and enhance green infrastructure.	
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	
15. To improve air quality and limit exposure to poor air quality.	
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++
Summary appraisal of Reasonable Alternative (RA)	
Proposed use for this site is delivery of enhanced clinical care facilities and re-provision of museum. This will contribute to the growing SC1 life sciences and MedTech health cluster in this part of Waterloo and re-provision	

of Florence Nightingale Museum. It is considered that the proposed landuses for the site will likely result in significantly positive effects on social objectives, notably health and wellbeing but also positive effects on economic objectives due to enhancing the site's employment capacity.

The site is in an excellent location with easy access to key services and facilities including for example shopping areas, river frontage, cultural activities in the area, local green spaces, public transport, employment areas and other healthcare facilities. People who work at the hospital and those that need access to the hospital and its ancillary uses will benefit from its exceptional public transport accessibility where national rail, tube and bus services can be accessed, river commuter transport, together with easy access to the amenities of the central activities zone (CAZ), and London city. Moreover, the site will deliver enhanced clinical care facilities and therefore will result in significant positive effects on the achievement of SustA objective 2 on health and wellbeing for people of the local area, Lambeth borough, London and nationally.

The proposed landuses for the site do not include any residential. However, the whole site is owned by Guy's and St Thomas' NHS Foundation Trust and their business is in provision of healthcare and therefore the site scores neutral against SustA objective 6. This, together with the fact there are development sites in the surrounding area that are more suitable for residential landuse (including proposed SA1 Royal Street) means the positive effects on health and wellbeing, improved access to health services and care and employment are considered to outweigh the neutral impact on the achievement of SustA objective 6 at this site.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA3: Car Park, Leigham Court Road, SW16 2NF

Reasonable Alternative (RA) 1: Active frontage ground floor within town centre boundary with town centre uses above plus residential to the rear of site

Reasonable Alternative (RA) 2: Active frontage ground floor within town centre boundary plus residential above and residential to the rear of site

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; generally these remain blank except in this case loss of the car park will likely have positive effect on objective 8 and also 12 and 15 at very local level. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) objective	Score RA1	Score RA2
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	++	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++	++
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.	++	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++	++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+	+
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.		
11. To create, manage and enhance green infrastructure.		
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+	+
13. To protect and manage water resources (including groundwater) and to minimise flood risk.		
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.		
15. To improve air quality and limit exposure to poor air quality.	+	+
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	++	+
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	++	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++	+

Summary appraisal of Reasonable Alternatives (RAs)

Provision of town centre uses at the site enables increased likelihood of activity which will help with passive surveillance and improved feelings of safety and security. It will also result in benefits to the local economy and offer opportunity for employment and employment generating activities in an area that has exceptional public transport accessibility. Active frontages on the ground floor contribute to the sense of place and offer activity within the town centre, thereby contributing positive effects on SA objectives 1, 7, 16 and 18.

One of the biggest influences of people's health is employment, so enabling town centre uses at this site for both alternatives but also above ground floor under RA1, likely offers positive effects with regards to health, although it is noted the location provides future residents easy access to other employment areas.

Both RAs offer residential and both RAs will result in provision of affordable housing which will help address unmet need in Lambeth. Accordingly, both alternatives result in significant positive effects on SustA objective 6.

The site is in an excellent location with easy access to key services and facilities in Streatham including for example shopping areas, gyms/leisure centres, pharmacies, library, fresh food, fruit and vegetables and public transport (bus and train) providing access to other employment areas and other healthcare facilities. RAs 1 and 2 involve residential development and therefore this, together with town centre uses at ground floor (and above (RA1)) on a site currently used as a public carpark, as well as proximity to public transport and other employment areas, means both RAs score positively with regards to SustA Objective 9. Loss of the car park will likely result in an improvement in air quality and carbon emissions at the very local level.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA7: 6-12 Kennington Road and Wooden Spoon House, 5 Dugard Way, SE11

Reasonable Alternative (RA) 1: Workspace to reprovide industrial capacity, replacement community use and residential

Reasonable Alternative (RA) 2: Workspace to provide greater industrial capacity with replacement community uses and residential

Reasonable Alternatives (RA) 3: Reprovision of community use of Wooden Spoon House onsite vs reprovision of community use elsewhere in the borough.

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) objectives	Score RA1	Score RA2	Score RA3	
			onsite	offsite
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	++	++	0	0
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++	++	++	0/?
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.	++	++	++	0/?
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?	+/?	+/?	0
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++	++	+	0/?
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++	++	+ / ++	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++	++	++	0/?
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.				
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++	++	0
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.				
11. To create, manage and enhance green infrastructure.				
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.				
13. To protect and manage water resources (including groundwater) and to minimise flood risk.				
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.				
15. To improve air quality and limit exposure to poor air quality.				

16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++	++	+	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	++	++	0	0
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++	++	++	++

Summary appraisal of Reasonable Alternatives (RAs)

RAs 1 and 2 include provision of community, light industrial and residential so it is likely there will be activity during the day related to all proposed landuses and activity at night associated with residential use, which will help with passive surveillance and improved feelings of safety and security. RAs 1 and 2 include opportunity for employment; RA2 offers more workspace than RA1, and therefore scores marginally more positively with regards to the economic objectives. Provision of light industrial workspace provides employment and business opportunity for local people and contributes to the local economy. It also reduces the need for local people to travel for employment and training opportunities.

RAs 1 and 2 also seek to reprovide community floorspace and therefore score well against the social sustainability appraisal objectives.

All RAs offer residential and will result in provision of affordable housing which will help address unmet need in Lambeth. Accordingly, the alternatives result in significant positive effects on SustA objective 6. (Reprovision of Wooden Spoon House on site may result in fewer residential units.)

Reprovision of the community use in Wooden Spoon House onsite would likely enable easy access to this specialist community facility for onsite future residents and other local residents and therefore results in positive effects on SustA objectives 2, 3, 5, and 7 for example. Reprovision of community use of Wooden Spoon elsewhere in the borough would free up land/space at this site to enable more residential and potentially more workspace.

The site is in an excellent location with easy access to key services and facilities in Elephant and Castle as well as at Kennington/Oval including for example shopping areas, gym and leisure facilities and education and health facilities. All RAs involve residential development and therefore this, together with other proposed landuses for the site as well as proximity to public transport and other employment areas, service and facilities, means the RAs score positively with regards to SustA Objective 9.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA8: Stamford Street, SE1

Reasonable Alternative 1: Provide residential and office

Reasonable Alternative 2: Provide residential and community use

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank (except it is recognised that the site is currently vacant). These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objectives	Score RA1	Score RA2
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	++	++ / ?
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++	++
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.	++	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++	++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+	+
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.		
11. To create, manage and enhance green infrastructure.		
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.		
13. To protect and manage water resources (including groundwater) and to minimise flood risk.		
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.		
15. To improve air quality and limit exposure to poor air quality.		
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	++	+
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	++	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++	+
<p>Summary appraisal of Reasonable Alternatives (RAs)</p> <p>Provision of office at the site enables increased likelihood of activity during the weekdays which will help with passive surveillance and improved feelings of safety and security. It will also result in benefits to the local economy and offer opportunity for employment and employment generating activities in an area that has exceptional public transport accessibility. One of the biggest influences of people's health is employment, so</p>		

enabling office at this site likely offers positive effects with regards to health, although it is noted the location provides residents easy access to other employment areas. RA1 will result in provision of affordable workspace, whereas RA2 will not. RA1 will contribute towards a more diverse economic/office environment for the site/local area, as well as allow opportunity for new business and start-ups to establish in this growth area/location that is highly accessible. Accordingly, RA1 will likely result in more positive effects than RA1 with respect to SustA objectives 1, 5, 16 – 18. Equally however, depending on the type of community use proposed on site, there is potential for positive impacts on people's health and improving their skills and training in finding employment. Provision of additional community space to the immediate area has potential to complement the adjoining Coin Street Neighbourhood Centre. Passive surveillance and level and frequency of activity will depend on the type of community use proposed. Community use on site would likely result in more positive effects on the social sustainability objectives (eg SustA objectives 2, 3, 5, 7) whereas provision of office floorspace will likely result in more positive effects on the economic objectives (eg 16, 18). Both uses would contribute positively in different ways to SustA objectives 2, 5, 7.

Both RAs offer residential and both RAs will result in provision of affordable housing which will help address unmet need in Lambeth. Accordingly, both alternatives result in significant positive effects on SustA objective 6.

The site is in an excellent location with easy access to key services and facilities including for example shopping areas, river frontage, cultural activities in the area, local green spaces (eg St John's Church Gardens, Bernie Spain Gardens, Hatfield Green), wide range of choice for public transport, employment areas and healthcare. RAs 1 and 2 involve residential development and therefore this, together with either community or office for the site as well as proximity to public transport and other employment areas, means both RAs score positively with regards to SustA Objective 9.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA9: Gabriel's Wharf and Princes Wharf, SE1

Reasonable Alternative 1: Residential plus re-provision of existing uses: cultural, retail and food and drink

Reasonable Alternative 2: Residential plus offices and/or workspace and replacement cultural, retail and food and drink floorspace

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objectives	Score RA1	Score RA2
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	++	++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++	++
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.	++	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++	++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++	+
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.		
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.		
11. To create, manage and enhance green infrastructure.		
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.		
13. To protect and manage water resources (including groundwater) and to minimise flood risk.		
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.		
15. To improve air quality and limit exposure to poor air quality.		
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+	++
Summary appraisal of Reasonable Alternatives (RAs)		

Both RAs offer residential and because RA1 does not include space for offices or workspaces, it is reasonable to presume RA1 enables more residential units than would be possible under RA2. Both RAs will result in provision of affordable housing, but it is possible that RA1 may result in more affordable housing than RA2) and therefore helps meet unmet need for housing (particularly affordable housing) at this site.

Provision of active ground floor uses (eg retail, food and drink) under both RAs will increase activity and passive surveillance. Provision of office and/or workspace at the site enables increased likelihood of activity during the weekdays which will help with passive surveillance and improved feelings of safety and security. It will also result in benefits to the local economy and offer opportunity for employment and employment generating activities in an area that has exceptional public transport accessibility.

One of the biggest influences of people's health is employment, so enabling office and/or workspace at this site will likely offer positive effects with regards to health, and the location provides future residents easy access to other employment areas. RA2 will result in provision of affordable workspace, whereas RA1 will not. This will contribute towards a more diverse economic/office environment for the site, as well as allow opportunity for new business and start-ups to establish in this growth area/location that is highly accessible. Accordingly, RA2 will likely result in more positive effects than RA1 with respect to the economic objectives. However, as noted above, RA1 will likely deliver more housing and affordable housing, and this has significant positive impact on people's health. Essentially, it is considered that both RAs at this site have potential to deliver significant benefits on the health objective.

All options involve reprovision of cultural, retail and food and drink uses. Active frontages will be required. It is considered that these types of uses positively contribute to achieving SustA Objective 7 and the vibrancy and activity of the South Bank/Bankside Strategic Cultural Area designation.

The site has exceptional public transport accessibility; Waterloo Station is a major national rail station servicing the South Western mainline. The station is adjacent to Waterloo East Station on the South Eastern mainline. Waterloo Station is also on the London Underground network and several London bus routes stop at Waterloo. The site also benefits from easy access to the Thames Clipper river transport for commuters. There are also a number of docking stations for cycle hire bikes close to the site. Access to this wide variety of transport options encourages use of sustainable forms of travel. The site also benefits from easy access to everyday key services and facilities such as shops, healthcare, leisure, jobs which will reduce the overall need for people to travel. RAs 1 and 2 involve residential development and therefore this, together with other proposed landuses for the site as well as proximity to public transport and other employment areas, means the RAs score positively with regards to SustA Objective 9.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA17: 330-336 Brixton Road, SW9

Reasonable Alternative 1: Reprovision of community, light industrial and offices but no residential

Reasonable Alternative 2: Reprovision of community, light industrial and office uses plus residential

Reasonable Alternative 3: Reprovision of community, light industrial use and provide more workspace than currently exists, plus residential

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these generally remain blank, although for this site the loss of petrol station is expected to result in positive effects on some SustA objectives at very local level. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objective	Score RA1	Score RA2	Score RA3
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+	++	++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / ++	++	++
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.	+ / ++	++	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+	+/?	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ / ++	++	++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	0	++	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+	+	+
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	+ / ++	+ / ++	+ / ++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.			
11. To create, manage and enhance green infrastructure.			
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+	+	+
13. To protect and manage water resources (including groundwater) and to minimise flood risk.			
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.			
15. To improve air quality and limit exposure to poor air quality.	+	+	+

16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+	+ / ++	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	- / ?	++	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+	+ / ++	++

Summary appraisal of proposed site allocation

RAs 2 and 3 include provision of community, light industrial and office floorspace plus residential so it is likely there will be activity during the day related to all proposed landuses and activity at night associated with residential use, which will help with passive surveillance and improved feelings of safety and security. RA1 does not include residential so therefore would be reduced level of passive surveillance and activity at the site in the evenings and weekends. All options include opportunity for employment; RA3 offers more workspace than the other two alternatives, and therefore scores more positively with regards to the economic objectives. It also reduces the need for local people to travel for employment and training opportunities.

RA1 scores less positively on a number of SustA objectives because it does not include housing nor affordable housing, for example, SustA objectives 2, 3, 5, 6, 7 and 17. It is reasonable to presume RA2 might enable more residential units than would be possible under RA3 because RA3 seeks to provide more workspace than RA2. Both RAs will result in provision of affordable housing, but it is possible that RA2 may result in more affordable housing than RA3.

All RAs score somewhat positively against SustA Objectives 12, 15, 8 and 2 due to the loss of existing petrol station.

Redevelopment of the site will enable improved site layout and accessibility for existing occupiers, including WeAre336 (a registered charity that supports disabled people and their organisation by providing an accessible disability hub).

The site is in a good location with relatively easy access to key services and facilities in Brixton including for example shopping areas, gyms/leisure centres, cultural activities in the area, local green spaces, public transport (although PTAL rating is 2), employment areas and healthcare. RAs 2 and 3 involve residential development and therefore this, together with other proposed landuses for the site as well as relatively easy access to other employment areas and Brixton town centre, means the RAs score positively with regards to SustA Objective 9.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA18: 286-362 Norwood Road, SE27

Reasonable Alternative 1: Reprovide existing quantum of commercial and community uses plus additional housing

Reasonable Alternative 2: Other town centre uses/workspace plus more commercial/community and less housing

Reasonable Alternative 3: Other town centre uses/workspace plus less commercial/community and more housing

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these generally remain blank, although for this site the loss of petrol station is expected to result in positive effects on some SustA objectives at very local level. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainably Appraisal (SustA) objectives	Score RA1	Score RA2	Score RA3
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	++	+	++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+	++	++
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.	+	++	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?	+/?	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+	+ / ++	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++	+	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+	+	+
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.			
11. To create, manage and enhance green infrastructure.			
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+	+	+
13. To protect and manage water resources (including groundwater) and to minimise flood risk.			
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.			
15. To improve air quality and limit exposure to poor air quality.	+	+	+

16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+	++	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+	++	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+	++	++

Summary appraisal of Reasonable Alternatives (RAs)

Overall, RA1 scores less positively than R 2 because it is only seeking to reprovide existing quantum of commercial and community space. Similarly, overall RA1 scores less positively than RA3 because RA3 provides more housing than RA1 and therefore means RA3 will likely contribute more positively to economic and social objectives than RA1.

Provision of town centre uses, community and commercial floorspace plus housing contributes to increased activity levels and can have positive effects on feelings of safety. Housing offers opportunity for passive surveillance, particularly at night.

All RAs offer residential, and all RAs will result in provision of affordable housing which will help address unmet need in Lambeth. RA2 may potentially result in delivery of less housing than RA1 or 3 and therefore this scored slightly less positively on SustA objective 6 and RAs 1 and 3.

One of the biggest influences of people's health is employment, so enabling town centre uses/ workspace and commercial floorspace at this site will likely offer positive effects with regards to health, although it is noted the location provides residents easy access to other employment areas and the West Norwood KIBA is close by. RA2 may contribute towards a more diverse economic/office environment for the site/local area, as well as allow opportunity for new business and start-ups to establish in this growth area/location that is highly accessible. Accordingly, RA2 scores positively on the economic objectives including some social objectives such as equalities. It is also recognised that some community uses can help prepare people for the workforce and/or provide support in training and skills. It is also recognised that households contribute to the local economy and therefore both RA2 and 3 score well against economic objectives. Housing and access to essential groceries and services/facilities are also key determinants of health which is also why RAs 2 and 3 score well against social objectives.

The site is in an excellent location with easy access to key services and facilities in West Norwood including for example shopping areas, health and leisure centre, cultural activities in the area (picturehouse / theatre), local green spaces, public transport, employment areas (eg West Norwood Key Industrial Business Area (KIBA)) and healthcare. All involve residential development and therefore this, together with the mx of commercial/community and town centre uses/workspace for the site as well as proximity to public transport and other employment areas, means all RAs score positively with regards to SustA Objective 9. Loss of the petrol station will likely result in an improvement in air quality and carbon emissions at the very local level.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA19: Knolly's Yard, SW16

Reasonable Alternative 1: Industrial intensification only with no residential

Reasonable Alternative 2: Industrial intensification with residential

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) objectives	Score RA1	Score RA2
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	0	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+	+ / ++
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.	0	+/?
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	0	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	--	+ / ++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.		
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	?	+ / ?
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.		
11. To create, manage and enhance green infrastructure.		
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.		
13. To protect and manage water resources (including groundwater) and to minimise flood risk.		
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.		
15. To improve air quality and limit exposure to poor air quality.		
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	++	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++	+ / ++
<p>Summary appraisal of Reasonable Alternatives (RAs)</p> <p>The site is identified in the Lambeth Local Plan as a Key Industrial Business Area with potential for industrial intensification and co-location. RA2 includes provision of both industrial intensification and residential so it is</p>		

likely there will be activity during the day related to industrial and residential uses, and activity at night associated with residential use - which will help with passive surveillance and improved feelings of safety and security. RA1 does not include residential, so there will be less activity to and from the site during the evenings and weekends.

Intensification of light industrial workspace provides employment and business opportunity for local people, the prospect of new business and start-ups to establish and therefore contributes to a more diverse local economy. It also reduces the need for local people to travel for employment and training opportunities.

RA2 offers residential and will result in provision of affordable housing which will help address unmet need in Lambeth. Accordingly, RA2 results in significant positive effects on SustA objective 6 (policies will apply to protect amenity for example Agent of Change).

The site is in a good location with relatively good, albeit indirect, access to key services and facilities in West Norwood and Tulse Hill town centres including for example shopping areas, gyms/leisure centres and local green spaces. However, public transport accessibility is mixed across the site. West Norwood station is approximately 900m from the site and Tulse Hill 950m from the site, but this distance could be reduced through improved accessibility of the site such as a footbridge, and redevelopment of the site provides opportunity to address this access issue.

RA1 offers a single landuse for the site and therefore scores less well against SustA objective 7 and less positively against SustA objective 17 (although it is recognised RA1 seeks to intensify the industrial use which therefore makes it a more efficient use of land than existing provision).

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA20: Tesco, Acre Lane, SW2

Reasonable Alternative 1: Reprovide supermarket with no other uses

Reasonable Alternative 2: Reprovide supermarket plus residential

Reasonable Alternative 3: Reprovide supermarket plus other town centre uses

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objectives	Score RA1	Score RA2	Score RA3
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	-	++	+
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+	++	+
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.	+	++	+
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	0/?	+/?	0/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+	++	+
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	0	++	0
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	-	++	+
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	0	0	0
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	?	+/?	?
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0/?	0/?	0/?
11. To create, manage and enhance green infrastructure.	0/?	0/?	0/?
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	0/?	0/?	0/?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	0/?	0/?	0/?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0/?	0/?	0/?
15. To improve air quality and limit exposure to poor air quality.	0/?	0/?	0/?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+	++	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	--	++	+

<p>18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.</p>	+	++	++
<p>Summary appraisal of Reasonable Alternatives (RAs)</p> <p>Overall, RA1 scores poorly – it offers no housing and therefore no affordable housing, it will not result in a sustainable mixed use liveable environment, it will not attract additional activity / be occupied during the night to positively contribute to passive surveillance and improved feelings of safety and it is not an efficient use of land.</p> <p>RA3 scores marginally better against a number of sustainability objectives because it offers potential for a diverse range of employment generating activities, and if office is proposed, would also require provision of affordable workspace. Provision of town centre uses enabling employment provides benefits to health and well-being, and some protected equality groups. It is an accessible site within the Brixton town centre boundary but does not capitalise on its location because it does not offer housing at this prominent accessible site.</p> <p>RA2 scores well against SustA objective 6 because it will result in new additional housing, including affordable housing which will help address unmet need in Lambeth. Provision of replacement supermarket enables activity during the day at the site, and residential above will help with passive surveillance and improved feelings of safety and security, particularly at night. It also results in benefits to the local economy and offers opportunity for employment in a location that has exceptional public transport accessibility. One of the biggest influences of people’s health is employment, but also housing and access to essential groceries (e.g. fresh and healthy food and pharmacy products), so enabling supermarket at this site likely offers positive effects with regards to health, and the location provides future residents easy access to other employment areas. Accordingly, RA2 scores positively with respect to SustA objectives 1, 2, 3, 5, 6, 7, 16 – 18.</p> <p>The site is in an excellent location with easy access to key services and facilities in Brixton including for example shopping areas, gyms/leisure centres, cultural activities in the area, local green spaces, public transport, employment areas and healthcare. As RA2 involves residential development, together with reprovided supermarket as well as proximity to a range of public transport and other employment areas, means RA2 scores positively with regards to SustA Objective 9 – but with some uncertainty on the amount of car-parking associated with the supermarket.</p> <p>Mitigation: Compliance with all relevant London Plan and Local Plan policies.</p>			

SA21: 51-65 Effra Road, SW2

Reasonable Alternative (RA) 1: Replacement space for existing community uses, new light industrial workspace plus residential.

Reasonable Alternative (RA) 2: Replacement space for existing community uses plus residential.

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objectives	Score RA1	Score RA2
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	++	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++	+ / ++
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.	++	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	+ / ++	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.		
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.		
11. To create, manage and enhance green infrastructure.		
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.		
13. To protect and manage water resources (including groundwater) and to minimise flood risk.		
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.		
15. To improve air quality and limit exposure to poor air quality.		
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	++	- / +
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	++	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++	-
Summary appraisal of Reasonable Alternatives (RAs)		

RAs 1 and 2 both include provision of community and residential but RA1 also includes provision of light industrial so it is likely there will be activity during the day related to all proposed landuses and activity at night associated with residential use, which will help with passive surveillance and improved feelings of safety and security under RA1. RA2 does not include light industrial space, so there may be less activity to and from the site during working hours. RA1 scores positively compared to RA2 with respect to the economic objectives because it makes provision for light industrial workspace and therefore contributes towards a more diverse economic environment for the site, as well as allow opportunity for new business and start-ups to establish in this growth area/location that is highly accessible. Both RAs make provision for existing community uses which include the Mosaic Clubhouse that offers members and visitors a wide range of opportunities including access to education and employment and signposting to other organisations/services.

Both RAs offer residential and because RA2 does not include light industrial workspace, it is reasonable to presume RA2 might enable more residential units than would be possible under RA1 (although design and viability information is not known at this stage). Both RAs will result in provision of affordable housing which will help address unmet need in Lambeth, but it is possible that RA2 may result in more affordable housing than RA1).

The site is in an excellent location with easy access to key services and facilities in Brixton including for example shopping areas, gyms/leisure centres, cultural activities in the area, local green spaces, public transport, employment areas and healthcare. RAs 1 and 2 involve residential development and therefore this, together with other proposed landuses for the site as well as proximity to public transport and other employment area, service and facilities, means the RAs score positively with regards to SustA Objective 9.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA22: 1&3-11 Wellfit St, 7-9 Hinton Rd & Units 1-4 Hardess St, SE24

Reasonable Alternative (RA) 1: Workspace to reprovide industrial capacity only

Reasonable Alternative (RA) 2: Workspace to reprovide industrial capacity and residential

Reasonable Alternative (RA) 3: Workspace to provide greater industrial capacity and residential

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objectives	Score RA1	Score RA2	Score RA3
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	0	+ / ++	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+	+ / ++	+ / ++
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.	0	++	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?	+/?	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+	+ / ++	++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	0	++	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	--	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.			
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	0	++ / ?	++ / ?
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.			
11. To create, manage and enhance green infrastructure.			
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.			
13. To protect and manage water resources (including groundwater) and to minimise flood risk.			
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.			
15. To improve air quality and limit exposure to poor air quality.			
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	0	+	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and	0/-	+ / ++	++

infrastructure, taking into account constraints such as contaminated land.			
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	0	+ / ++	++
<p>Summary appraisal of Reasonable Alternatives (RAs)</p> <p>RAs 2 and 3 include provision of both light industrial landuse and residential so it is likely there will be activity during the day related to light industrial and residential uses, and activity at night associated with residential use - which will help with passive surveillance and improved feelings of safety and security. RA1 does not include residential, so there will likely be less activity to and from the site during the evenings and weekends.</p> <p>Light industrial workspace provides employment and business opportunity for local people, the prospect of new business and start-ups to establish and therefore contributes to a more diverse local economy. It also reduces the need for local people to travel for employment and training opportunities. RA3 offer increased workspace onsite and therefore scores more positively against the economic SustA objectives.</p> <p>RAs 2 and 3 offer residential and will result in provision of affordable housing which will help address unmet need in Lambeth. Accordingly, RAs 2 and 3 results in significant positive effects on SustA objective 6 (policies will apply to protect amenity for example Agent of Change). RA1 does not propose residential and therefore scores neutral against SustA objective 6 (does not harm SustA objective 6 but does not make positive contribution towards achieving it either).</p> <p>The site is within walking distance of Loughborough Junction Local Centre which offers supermarket, fresh food, fruit and vegetables, pharmacies, public transport. A wider range of services and facilities are available in Brixton which is about 1km away. King's College Hospital is also close by. RAs 2 and 3 involve residential development and therefore this, together with other proposed landuses for the site as well as relatively easy access to other employment areas and Loughborough Junction and Brixton town centres, means the RAs score positively with regards to SustA Objective 9.</p> <p>RA1 offers a single landuse for the site and therefore scores poorly against SustA objective 7 and less positively against SustA objective 17 (although it is recognised RA1 seeks to intensify the industrial use which therefore makes it a more efficient use of land than existing provision).</p> <p>Mitigation: Compliance with all relevant London Plan and Local Plan policies.</p>			

SA23: Land at corner of Coldharbour Lane and Herne Hill Road, SE24

Reasonable Alternative 1: Active frontage ground floor with replacement community uses plus residential within local centre boundary, plus workspace outside the centre and residential

Reasonable Alternative 2: Active frontage ground floor with replacement community uses plus other town centre uses within local centre boundary, plus workspace outside the centre.

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against Susta objectives 8, 10-15; these remain blank. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SutsA) Objective	Score RA1	Score RA2
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	++	+
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++	+ / ++
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.	++	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++	--
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.		
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.		
11. To create, manage and enhance green infrastructure.		
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.		
13. To protect and manage water resources (including groundwater) and to minimise flood risk.		
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.		
15. To improve air quality and limit exposure to poor air quality.		
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	++	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++	++

Summary appraisal of Reasonable Alternatives (RAs)

RA 1 includes provision of replacement community, workspace plus residential so it is likely there will be activity during the day related to all proposed landuses and activity at night associated with residential use, which will help with passive surveillance and improved feelings of safety and security. RA2 does not include residential so therefore would likely be reduced level of passive surveillance and activity at the site in the evenings and weekends. Both options include opportunity for employment; RA2 may perhaps result in more employment space than RA1, and therefore scores slightly more positively with regards to SustA objective 16. It also reduces the need for local people to travel for employment and training opportunities.

RA2 scores less positively on a number of SustA objectives because it does not include housing nor affordable housing, for example, SustA objectives 2, 3, 5 and 17 but it is recognised that RA2 will result in a more diverse range of town centres uses that can mean improved accessibility to services and facilities. Re-provision of the community facilities contributes to the positive score on these SustA objectives.

The site is in a good location with relatively easy access to key services and facilities in Loughborough Junction, Herne Hill and Brixton including for example shopping areas, gyms/leisure centres, cultural activities in the area, local green spaces, public transport (although PTAL rating is 2), employment areas and healthcare. RA 1 involves residential development and therefore this, together with other proposed landuses for the site as well as relatively easy access to other employment areas and Brixton major town centre, means the RAs score positively with regards to SustA Objective 9.

Most of the site is within Loughborough Junction Local Centre town centre boundary, which offers supermarket, fresh food, fruit and vegetables, pharmacies, public transport. A wider range of services and facilities are available in Brixton town centre which is about 1km away. King's College Hospital is also close by. RA1 involves residential development and therefore this, together with other proposed landuses for the site as well as relatively easy access to other employment areas and Loughborough Junction and Brixton town centres, means the RAs score positively with regards to SustA Objective 9.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

SA24: King's College Hospital, Denmark Hill, SE5

Reasonable Alternative (RA) 1: Optimise capacity for clinical uses across the site, including in the KIBA (with no loss of waste management capacity)

Reasonable Alternative (RA) 2: Optimise capacity for clinical uses across the site but with industrial uses only within the KIBA (with no loss of waste management capacity)

The reasonable alternatives proposed involve land-use only and they do not go into the details of building or site design, urban greening, open space, biodiversity, energy and heating technologies, air quality, waste management and flood risk and therefore for the purposes of appraising reasonable alternatives against SustA objectives 8, 10-15; these remain blank with the exception of SustA objective 14 because the site is a safeguarded waste site that both RAs seek to retain. These objectives can be appraised against the proposed site allocation policies once formulated. It is worth noting that all relevant London and Local Plan policies will apply to redevelopment of the site.

Sustainability Appraisal (SustA) Objectives	Score RA1	Score RA2
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+	+
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	++	+ / ++
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.	++	++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+	+
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	++	++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	0	0
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+	++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.		
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.		
11. To create, manage and enhance green infrastructure.		
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.		
13. To protect and manage water resources (including groundwater) and to minimise flood risk.		
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	++	++
15. To improve air quality and limit exposure to poor air quality.		
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++	++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	++	++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++	++

Summary appraisal of Reasonable Alternatives (RAs)

Whilst both RAs seek to optimise capacity for clinical uses across the site, RA1 seeks to do this within the KIBA too (but with no loss of waste management capacity) and therefore scores slightly more positively against SustA objective 2 than RA2 because it is presumed RA1 might enable increased health provision than RA2.

Similarly, RA2 retains the KIBA for industrial uses only (and no loss of waste management capacity) and therefore scores slightly more positively on the economic objectives.

The site is in an excellent location with easy access to key services and facilities including for example shopping areas, local green spaces, public transport, employment areas. People who work at the hospital and those that need access to the hospital and its ancillary uses will benefit from its exceptional public transport accessibility where national rail, London Overground and bus services can be accessed, together with easy access to the amenities of Camberwell, Loughborough Junction and Brixton further afield. Moreover, the site will deliver enhanced clinical care facilities and therefore will result in significant positive effects on the achievement of SustA objective 2 on health and well-being for people of the local area, Lambeth borough, London and potentially nationally.

The RAs for the site does not include any residential. However, the whole site is owned by King's College Hospital NHS Foundation Trust and King's College London, and their business is in provision of healthcare and therefore the site scores neutral against SustA objective 6. This, together with the fact there are development sites in the surrounding area that are more suitable for residential landuse (including proposed SA22 and SA23) means the positive effects on health and wellbeing, improved access to health services and care and employment are considered to outweigh the neutral impact on the achievement of SustA objective 6 at this site.

Mitigation: Compliance with all relevant London Plan and Local Plan policies.

Stages B3 and B4: Evaluating likely effects, consideration of mitigation and maximisation of benefits

- 4.8 The purpose of Stage B3 (evaluate the likely effects of the Local Plan and alternatives) is to predict the social, environmental and economic effects (including equalities and health) of the Draft SA DPD. The SEA Directive requires that the environmental report provides information on the likely significant effects, including secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects on the environment.
- 4.9 The purpose of Stage B4 (consider ways of mitigating adverse effects and maximising beneficial effects) is to set out the measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the Site Allocations. Mitigation measures also include proactive avoidance of adverse effects and measures to enhance positive effects.
- 4.10 Where appropriate, recommendations to improve the sustainability performance of the draft site allocation policies have been proposed in the SustA process alongside the plan making process. Where recommendations have been made in this SustA process; these have been discussed and considered concurrently with the policy team preparing the Draft SA DPD so that the Draft SA DPD could benefit from incorporating the SA recommendations.
- 4.11 The assessment of significant effects of the Draft SA DPD on an SustA objective includes expected magnitude and spatial extent, the timescale over which they will have an effect, their likelihood, the impact of cumulative effects and whether the effect will be temporary or permanent. Taking into account the Plan period the following approach has been adopted for the timescales:
- | | |
|--------------|---------------------|
| Short term: | First 5 years |
| Medium term: | 5 years to 10 years |
| Long term: | More than 10 years |
- 4.12 Table 7 summarises the symbols that have been used in the appraisal of the Draft SA DPD to show the significance of likely effects arising for the Plan.

Table 7: Symbols used in the appraisal

Symbol	Meaning
++	Significant positive effect on sustainability objective (normally direct)
+	Minor positive effect on sustainability objective
0	Neutral effect on sustainability objective
-	Minor negative effect on sustainability objective
--	Significant negative effect on sustainability objective (normally direct)
/	Policy has more than one score e.g. +/- policy could both support and conflict with the Sustainability Appraisal objective in a minor way.
?	Uncertain effect on sustainability objective

4.13 This draft report represents an assessment of the Draft SA DPD (Regulation 18) stage of the plan making process. As noted above, where appropriate, recommendations have been made during the process and incorporated not the Draft SA DPD. The plan making process enables opportunity for further changes to the Draft SA DPD as a result of Regulation 18 consultation. Appraisal of the draft site allocation policies is provided below for the 14 sites.

SA1: Royal Street, SE1

Proposed Site Allocation: Development should include no fewer than 129 residential self-contained units, to replace the existing quantum of homes on site. In addition, there is potential to accommodate office floor-space, including approximately 30% that is lab-enabled to contribute to the creation of the SC1 cluster; flexible spaces at ground floor level to activate frontages, providing a range of unit sizes and types; and cultural uses to contribute to the evolution of the South Bank and Waterloo cultural cluster. Public benefits will include new affordable housing, plus affordable workspace and employment and training opportunities for local people within those growing sectors.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+/>++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+/>++
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.	+/>++/?
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/>?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+/>++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+/>++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+/>++/?
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	+/>++/?
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	+/>++
11. To create, manage and enhance green infrastructure.	+/>++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+/>?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+/>?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0/>?
15. To improve air quality and limit exposure to poor air quality.	+/>?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+/>++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+/>++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+/>++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development which seeks to contribute to the creation of the Waterloo SC1 health, life-sciences and artificial intelligence (including MedTech) cluster, the growing cluster of low carbon industries in this part of Lambeth, and the evolution of the South Bank and Waterloo creative</p>	

cluster. Development is envisaged to comprise at least 129 self-contained residential units (including affordable housing), office floorspace (including lab-enabled space), flexible Class E spaces at ground floor level to activate frontages, and cultural uses. It is considered that the proposed landuses for the site allocation will likely result in positive and significantly positive effects on most social, environmental and economic sustainability objectives.

Affordable housing and affordable workspace will be required. For the workspace, policy ED2 states 10% of the net uplift in office floorspace must be provided as affordable at a 50% reduction from market values for a period of 15 years. The proposed site allocation policy envisages that this affordable workspace can include a proportion of the lab-enabled space (wet and dry); research and development business incubator space; cultural uses; a skills and education hub linked to the life-sciences sector. The site currently has 18885sqm GEA office floorspace so policy ED2 will only apply on office floorspace greater than this existing quantum. Provision of affordable workspace will have positive effects on SustA objectives 2, 5, 7, 16 and 18 in particular.

The site is in an excellent location with easy access to key services and facilities including for example shopping areas, river frontage, cultural activities in the area, local green spaces, public transport, employment areas and healthcare. The site allocation would enable more people to benefit from its location with exceptional public transport accessibility where national rail, tube and bus services can be accessed, river commuter transport, together with easy access to the amenities of the central activities zone (CAZ), London city and social infrastructure such as St Thomas's Hospital. Moreover, the site will deliver an expansion of the St Thomas' Hospital in the form of offices and research laboratories which will provide expertise in medical care and therefore will result in significant positive effects on the achievement of SustA objective 2 on health and well-being for people of the local area, Lambeth borough, London and nationally. The site allocation policy also has good potential to promote accessible and inclusive environment and encourage walking, cycling and use of public transport, particularly through improved public realm and widened footways on Royal Street, permeability for cyclists and pedestrians and improving existing and future cycle routes, Healthy Routes, Greenways and the Low Line. Consideration of community safety early in the design process of the development will result in enhancing feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Waterloo area. Improved feelings of community safety results in wide ranging benefits including many equality groups for example, older people, younger people, those of certain faiths, LGBTG+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The proposed site allocation seeks to include no fewer than 129 self-contained residential units to replace the existing quantum of homes on site. Whilst this does not directly 'promote increased supply of housing to meet local needs' (SustA Objective 6 prompt question); the allocation does not preclude proposals of more than 129 units coming forward. 35% of the units will need to be affordable. To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation. Positive effects on SustA objective 6 are expected.

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. To further assist, this site allocation policy should require contribution to maintenance of existing open spaces as development of the site will likely result in significant increased usage of existing parks and open spaces (change already incorporated in SA DPD). As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

The site abuts Archbishops Park, a site of importance for nature conservation, and therefore it is likely that residents on the site will benefit from the visual effects of the green space (design of buildings/outlooks on site should enable this). The site is still within an area of access to nature deficiency so it will be important to incorporate areas of habitat appropriate to the site where possible, for example brown roofs. Inclusion of on-site biodiversity improvements should take account of the biodiversity value of the abutting site and seek to facilitate green stepping-stones / green corridors for species. The site allocation makes provision for this through improving the relationship with Archbishop's Park and producing an urban greening strategy for the site. Extensive new green infrastructure (UGF) will improve health and well-being for those living, working and

visiting in the area, as well as contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 10, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. The mixed-use nature of the development and proximity to St Thomas' Hospital also means delivery of decentralised heating may be more feasible. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the Royal Street site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to preserve the significance (including setting) of heritage assets. The site is identified as appropriate for tall buildings in the locations shown in Local Plan Annex 10. The site allocation policy provides further site-specific guidance and design principles on building heights, views and townscape and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and townscape and therefore positive effects on the achievement of SustA Objective 8.

It is considered that the proposed site allocation is likely to have positive impacts on the local economy and employment opportunities, however there is considered an uncertainty on the potential impact of the proposed site allocation on nearby small and independent businesses in Lower Marsh. An Employment and Skills Plan to secure jobs and training opportunities for Lambeth residents within the health and life sciences, low carbon, creative, digital and artificial intelligence sectors will result in positive impacts on SustA Objective 18. Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. Positive effects on the economy (ie SustA Objectives 16-18 are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

The site currently comprises residential, carparking, community farm and part vacant. It is a brownfield site that is currently underutilised. The site allocation proposes a more mixed-use, multifunctional, more efficient use of land. The site allocation policy could potentially provide more guidance on the future use of the railway arches and perhaps how it is envisaged the arches will relate to the development on the remaining area of the site. The policy team may wish to revisit this.

The site allocation policy results in the loss of the existing Carlisle Lane car park (used by St Thomas' hospital) and this may have some short-term negative impact on some users of the hospital. However, the site has exceptional public transport accessibility, and the Development Plan for Lambeth does not protect car parks. Local Plan and London Plan parking standards will apply to the development (essentially car-free development except where required, for example Blue Badge parking). Loss of the car park will result in benefits to air quality through reduced private car transport. The site allocation policy will also result in the loss of the Oasis Waterloo Farm which is deemed a temporary 'meanwhile' use and for some, may reduce access to other related uses and their perception of 'liveability'. Overall though, it is considered redevelopment of the sort proposed is a more efficient use of land at this location that delivers exceptional health, economic, social and environmental benefits locally, regionally and nation-wide through the expansion of the new MedTech innovation cluster and provision of affordable workspace, but also through cultural uses to contribute to the evolution of the South Bank and Waterloo cultural cluster and the vision for the growing cluster of low carbon industries in this part of Lambeth.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with the Urbanest building on Westminster Bridge Road. This will ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Overall the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible

through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described and in the table above are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA2: St Thomas' Hospital, SE1

Proposed Site Allocation: The optimisation of development on this site provides an opportunity to deliver enhanced clinical care facilities and to contribute to the growing SC1 Life sciences and MedTech health cluster in this part of the Waterloo Opportunity Area. There is also a significant opportunity to improve the townscape character and pedestrian experience along Lambeth Palace Road, in conjunction with the development of the Royal Street site. Both developments offer the potential to enhance the Albert Embankment Conservation Area and should preserve or enhance the setting and Outstanding Universal Value of the Westminster World Heritage Site. The Florence Nightingale Museum will be re-provided on-site or at an appropriate alternative location.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / ++
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.	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	0
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ / ++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ / ++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	+ / ++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	+ / ++
11. To create, manage and enhance green infrastructure.	+ / ++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ / ?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ / ?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 / ?
15. To improve air quality and limit exposure to poor air quality.	+ / ?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of enhanced clinical care facilities to contribute to the creation of the growing SC1 life sciences and MedTech health cluster in this part of Waterloo and re-provision of Florence Nightingale Museum. It is considered that the proposed landuses for the site allocation will likely result in significantly positive effects on social objectives, notably health and wellbeing.</p>	

The site is in an excellent location with easy access to key services and facilities including for example shopping areas, river frontage, cultural activities in the area, local green spaces, public transport, employment areas and other healthcare facilities. People who work at the hospital and those that need access to the hospital and its ancillary uses will benefit from its exceptional public transport accessibility where national rail, tube and bus services can be accessed, river commuter transport, together with easy access to the amenities of the central activities zone (CAZ), and London city. Moreover, the site will deliver enhanced clinical care facilities and therefore will result in significant positive effects on the achievement of SustA objective 2 on health and well-being for people of the local area, Lambeth borough, London and nationally. The site allocation policy also has good framework to promote accessible and inclusive environment and encourage walking, cycling and use of public transport, particularly through improved public realm and contribution towards implementation of the Healthy Route Network in the vicinity of the site. Consideration of community safety early in the design process of the development will result in enhancing feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Waterloo area. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTG+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The site allocation does not propose any housing on site which is why it scores neutral with respect to SustA objective 6 on housing. However, the whole site is owned by Guy's and St Thomas' NHS Foundation Trust and their business is in provision of healthcare. This, together with the fact there are development sites in the surrounding area that are more suitable for residential landuse (including proposed SA1 Royal Street) means the positive effects on health and wellbeing, improved access to health services and care and employment are considered to outweigh the lack of residential provision at this site.

Redevelopment of the site will likely result in an increase of visits by patients and family to and from the site, as well as an increase in those employed at the site. This could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that requirements of Local Plan Policy S2 in relation to new social infrastructure should be addressed.

The site is just north and across the road from Archbishops Park, a site of importance for nature conservation, and therefore it is possible that patients on the site may benefit from either the visual effects of the green space (design of buildings/outlooks on site should enable this) or the easy access to green space. Part of the site is within an area of access to nature deficiency so it will be important to incorporate areas of habitat appropriate to the site where possible, for example brown roofs. Inclusion of on-site biodiversity improvements should take account of the biodiversity value of the adjacent Archbishops Park and if appropriate redevelopment of adjacent SA1 Royal Street and seek to facilitate green stepping-stones / green corridors for species. Extensive new green infrastructure (UGF) will improve health and well-being for those living, working and visiting in the area, as well as contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 10, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. The site allocation specifies that the River Thames should be prioritised for transportation of construction materials and waste during construction of the development, and for site waste once operational. New buildings will have significantly higher energy performance than existing inefficient buildings, which will reduce future carbon emissions and fuel bills (positive effects on SustA 12, 2). Redevelopment of this part of the hospital estate may facilitate delivery of decentralised heating for the immediate local area. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation. Flood risk mitigation on the site will reduce risk of flood damage to the hospital but also help mitigate risk to local homes and businesses (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the London Plan and Lambeth Local Plan have policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the St Thomas' site allocation policy responds positively on these matters.

The site allocation policy provides good site-specific guidance to preserve the significance (including setting) of heritage assets. The site is not within a location identified as appropriate for tall buildings. The site allocation

policy provides further site-specific guidance and design principles on building heights, views and townscape and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and townscape and therefore positive effects on the achievement of SustA Objective 8.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours at County Hall South Block and the Urbanest building on Westminster Bridge Road. This will ensure achievement of SustA objectives 6 and 7 for surrounding residents.

It is considered that the proposed site allocation is likely to have positive impacts on the local economy and employment opportunities. An Employment and Skills Plan to secure jobs and training opportunities for Lambeth residents within the health and life sciences, low carbon, creative, digital and artificial intelligence sectors will result in positive impacts on SustA Objective 18. Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. Positive effects on the economy (ie SustA Objectives 16-18) are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

Overall the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives (with the exception of SustA objective 6) have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure ie social, physical (transport, water, wastewater, heating) and environmental (open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA3: 35 – 37 and Car Park, Leigham Court Road, SW16

Proposed site allocation: Mixed-use development that includes ground floor active frontages onto Leigham Court Road, with commercial space or residential above and new housing with affordable housing to the rear.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+/++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+/++
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.	+/++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+/++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+/++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+/++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	+/++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	++
11. To create, manage and enhance green infrastructure.	++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+/?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+/?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0/?
15. To improve air quality and limit exposure to poor air quality.	+/?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+/++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+/++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+/++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development incorporating commercial floorspace within Class E within the town centre boundary and housing. It provides new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold is 50% as the site is in public ownership. To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.</p> <p>Provision of commercial use within Class E provides new high quality, accessible space for small businesses, employment and business opportunity for local people and contributes to the local economy. Active frontages on the ground floor contribute to the sense of place and offer activity within the town centre, thereby contributing positive effects on SA objectives 7, 16 and 18.</p>	

The site is in an excellent location with easy access to key services and facilities in Streatham including for example shopping areas, gyms/leisure centres, pharmacies, library, fresh food, fruit and vegetables and public transport (bus and train) providing access to other employment areas and other healthcare facilities. The site allocation would enable more people to benefit from its location with exceptional public transport accessibility where Streatham Hill Rail Station (which has step-free access) and bus services can be easily accessed, together with easy access to the range of amenities of Streatham town centre. Car-free development and loss of the existing car park, in an air quality focus area, will have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has good potential to further promote accessible and inclusive environments and encourage walking, cycling and use of public transport. The allocation expects enhancement of the spacious footway and public realm to Leigham Court Road. Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area. The site allocation policy expects the access route into the site to be publicly accessible and un-gated with a sense of security achieved through good levels of natural surveillance over all publicly accessible areas. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area and the allocation policy states that whilst urban greening will be expected across the site it should be particularly focused along the north-east boundary to provide biodiversity benefits and improve the cohesiveness to the adjoining SINC. This will also contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 10, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses. The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the Leigham Court Road site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. The site is identified as not appropriate for a tall building. Heritage assets and the adjoining Conservation Area are appropriately acknowledged and protected by the allocation policy.

The site is a brownfield site that is currently underutilised as a public car-park. There is uncertainty on what the loss of the existing car park would have on the existing businesses of Streatham Hill. On another hand, redevelopment of the site will help boost the local economy through increasing customer base of local

businesses (increased population to area) and through construction work (short-term effect). Positive effects on the economy (ie SustA Objectives 16-18) are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site. Loss of the car park is counter-balanced by improved air quality and carbon emissions and improved health and well-being with fewer people travelling by private car in this local area.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Leigham Court Road. This will help ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Overall the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA7: 6-12 Kennington Road and Wooden Spoon House, 5 Dugard Way, SE11

Proposed Site Allocation: Redevelopment should include replacement light industrial capacity and community facilities, along with new housing (approx. 135 – 145 self-contained residential units), including affordable housing.

The site provides an opportunity for comprehensive mixed-use redevelopment, which is likely to achieve optimum development capacity and the best place-shaping outcome. However, given multiple land ownerships, the site may come forward in phases, in which case each phase should contribute to and help deliver the overall vision for the site as a whole. Proposals for any part of the site should not compromise or restrict delivery of the overall vision.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / 0
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.	+ / +++ / ?
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ / ?
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ / ?
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ / ++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	+ / +++ / ?
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0 / ?
11. To create, manage and enhance green infrastructure.	+ / ++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ / ?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ / ?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 / ?
15. To improve air quality and limit exposure to poor air quality.	+ / ?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development incorporating residential, light industrial floorspace and replacement community use. Reprovision of medical facilities has potential to be re-provided elsewhere if this is done as part of an agreed strategy for provision of this service (in accordance with Local Plan policy S1). The allocation provides essentially new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold will range from 35% to 50% as the</p>	

site is in a mix of public and private ownership (42% across the whole site). To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.

The site currently accommodates Wooden Spoon House, who provide paediatric sickle cell and thalassaemia community nursing services. However, the allocation allows for the facilities to be either reprovided on site or reprovided elsewhere off site (if the requirements of Local Plan policy S1 are met). As such, the allocation has neutral effects regarding health and well-being, necessary infrastructure, social inclusion (SustA objectives 2, 4 and 5). Location of any off-site provision is unknown and therefore there may be some uncertainty on accessible and inclusive environment (SustA objectives 3 and 7). It may be that new off-site provision is in a more accessible location with improved facilities. Depending on the accessibility of the facilities' new location, this may increase the need to travel and/or reliance on private cars for Lambeth residents to access the service (SustA objective 9).

The site allocation will provide replacement of community floorspace for the vacant community centre. Local Plan policy S2 provides that such buildings and facilities be designed to be flexible, adaptable, promote social inclusion and sited to maximise shared community use of premises where practical. The proposal is likely to result in involving facilities that appeal to a wider range of people and being facilities that can be used for longer hours and weekdays as well as weekends. It is recommended the site allocation policy make specific reference to policy S2 (recommendation since incorporated into SA DPD).

Provision of light industrial workspace provides employment and business opportunity for local people and contributes to the local economy. It also reduces the need for local people to travel for employment and training opportunities.

The site is in an excellent location with easy access to key services and facilities in Kennington/Oval and Elephant and Castle including for example shopping areas, gym and leisure facilities and education and health facilities. The site allocation would enable more people to benefit from its location with exceptional public transport accessibility where national rail, tube and bus services can be accessed, together with easy access to the amenities of Elephant and Castle town centre. Development will be car-free, which this will have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has good potential to promote accessible and inclusive environments and encourage walking, cycling and use of public transport. The allocation expects pedestrian priority design and proposes to widen the footpath along the Kennington Lane frontage to improve pedestrian movement, accessibility and safety. Proposed provision of a signalised crossing would also improve the built environment for pedestrians and cyclists (positive impacts on SustA objective 9).

Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Kennington area. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

The site allocation policy supports increased street tree planting and provision of green infrastructure through the Urban Greening Factor, which will contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA objectives 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the Kennington Lane site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. The site is considered suitable for a tall building, however design principles related to height and massing are included in the policy to minimise amenity impacts. Heritage assets and protected views are appropriately acknowledged and protected by the allocation policy.

The site is a brownfield site that is currently underutilised, particularly with regards to the vacant community floorspace. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and reversion of community floorspace, light industrial workspace and new households to the site which will support local economy. Positive effects on the economy (ie SustA Objectives 16-18 are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Newington Butts, Kennington Lane, Dugard Way and

Renfrew Road. This will help ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Overall the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have largely been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. The proposal does not seek to re-provide existing healthcare uses on site and so there may be some uncertainty on location of any re-provision. As such the proposal is likely to result in some level of uncertain effects on the SustA objectives (e.g. objectives 2, 3, 4, 5 and 9). Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

As the site is in multiple land ownership, there is a risk that redevelopment is not undertaken in a comprehensive way, however the wording of the draft SA policy seeks to mitigate this risk by requiring phased development to address the vision for the wider site.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA8: 110 Stamford Street, SE1

Proposed Site Allocation: The site has potential to accommodate community/office floorspace at ground floor, providing an active frontage to Stamford Street and approximately 30 to 40 self-contained residential units, including affordable housing. There is opportunity to create new public realm on the Stamford Street frontage with potential for activation on the corner with Cornwall Road.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / ++
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.	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ / ++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ / ++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	+ / ++ / ?
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0 / ?
11. To create, manage and enhance green infrastructure.	+ / ++ / ?
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ / ?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ / ?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 / ?
15. To improve air quality and limit exposure to poor air quality.	+ / ?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development incorporating residential and community/office floorspace at ground floor. It is considered that the proposed landuses for the site allocation will likely result in positive and significantly positive effects on most social, environmental and economic sustainability objectives. It provides essentially new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold will be required. To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Waterloo in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.</p> <p>The site allocation will provide for community/office floorspace at ground floor. If at least 1000sqm office floorspace is proposed, then affordable workspace will be required (in line with Local Plan policy ED2) offering</p>	

positive effects on achievement of SustA objectives 5, 16, 18. If community use is proposed then Local Plan policy S2 applies which provides that such buildings and facilities be designed to be flexible, adaptable, promote social inclusion and sited to maximise shared community use of premises where practical. The proposal is therefore likely to result in involving facilities that appeal to a wider range of people and being facilities that can be used for longer hours and weekdays as well as weekends. It is recommended the site allocation policy make specific reference to policy S2 (recommendation since incorporated into SA DPD). Provision of additional community space to the immediate area has potential to complement the adjoining Coin Street Neighbourhood Centre.

The site is in an excellent location with easy access to key services and facilities including for example shopping areas, river frontage, cultural activities in the area, local green spaces (eg St John's Church Gardens, Bernie Spain Gardens, Hatfield Green), wide range of choice for public transport, employment areas and healthcare. Overall, the site allocation has good potential to improve health and well-being, promote accessible and inclusive environments and encourage walking, cycling and use of public transport. Accordingly, the site allocation has positive effects on SustA Objectives 2, 3, 7, 9 and potentially 18..

Development will be car-free, and in an air quality focus area, this will have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

As the site allocation facilitates delivery of mix-used there will be good potential to reduce crime and fear of crime through increased passive surveillance at all times of the day/night. The site allocation contributes to improved social cohesion, by being beneficial to disadvantaged groups through providing affordable housing, and potentially affordable workspace (if office floorspace is proposed), employment opportunities and community space (if proposed).

The site allocation would enable more people to benefit from its location with exceptional public transport accessibility where national rail, tube and bus services can be accessed, river commuter transport, together with easy access to the amenities of the central activities zone (CAZ), London city and social infrastructure such as St Thomas's Hospital and Evelina London Children's Hospital. The site allocation policy also has good potential to promote accessible and inclusive environment of the immediate area and encourage walking, cycling and use of public transport, particularly through improved public realm (potential for kiosk on corner with Cornwall Road) and contribution to the implementation of the Spine Route and Healthy Route along Upper Ground. Consideration of community safety early in the design process of the development will result in enhancing feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Waterloo area. Improved feelings of community safety results in wide ranging benefits including many equality groups for example, older people, younger people, those of certain faiths, LGBTG+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

The site is within an area of open space deficiency for district, metropolitan and regional parks, and also access to nature deficiency so it will be important to incorporate areas of habitat appropriate to the site where possible, for example brown roofs. Extensive new green infrastructure (UGF) will improve health and well-being for those living, working and visiting in the area, as well as contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing, which will reduce carbon emissions of occupation and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. The mixed-

use nature of the development means delivery of decentralised heating may be more feasible, particularly given other nearby redevelopment. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the Stamford Street site allocation policy responds positively on these matters.

The site allocation policy recognises nearby heritage assets. The site is identified as not appropriate for a tall building. The site allocation policy provides further site-specific guidance and design principles on building heights, views and townscape and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and townscape and therefore positive effects on the achievement of SustA Objective 8.

It is considered that the proposed site allocation is likely to have direct positive impacts on the local economy and employment opportunities, particularly if office floorspace is provided, but also potentially through community uses if they include a skills/training/educational element to them, or indirectly through childcare for example, or enhancing provision of the existing adjoining Neighbourhood Centre. Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion (and this can be achieved through local plan policy ED15 and the employment and skills plan). Positive effects on SustA objectives such as 2, 5, 16 and 18 are expected.

The site is a vacant brownfield site that is currently underutilised. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and provision of community/office and new households to the site which will support local economy. Positive effects on the economy (ie SustA Objectives 16-18 are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Stamford Street and Cornwall Road. This will help ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Overall the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be medium term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing, energy efficiency and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA9: Gabriel's Wharf and Princes Wharf, Upper Ground, SE1

Proposed Site Allocation: The site has significant potential for a mix of uses that will contribute positively to the Waterloo Opportunity Area and this part of the South Bank and Bankside Strategic Cultural Area, including cultural uses, offices, housing with affordable housing, and shops and restaurants fronting a new piazza. Such a scheme would enhance the character and appearance of the South Bank Conservation Area.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / ++
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.	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ / ++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ / ++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0 / ?
11. To create, manage and enhance green infrastructure.	+ / ++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ / ?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ / ?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 / ?
15. To improve air quality and limit exposure to poor air quality.	+ / ?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development comprising cultural use, office accommodation, retail and housing which due to its location, will provide occupiers with easy access to key services and facilities including for example shopping areas, river frontage, cultural activities in the area, local green space at Bernie Spain Gardens, wide range of choice for public transport, employment areas and healthcare. Overall, the site allocation has good potential to improve health and well-being, promote accessible and inclusive environments and encourage walking, cycling and use of public transport. Accordingly, the site allocation has positive effects on SustA Objectives 2, 3, 7, 9 and potentially 18. It is considered that the proposed landuses for the site allocation will likely result in positive and significantly positive effects on most social, environmental and economic sustainability objectives.</p>	

The proposed site allocation seeks to accommodate housing. Should C3 housing be proposed threshold level of affordable housing will be required and to follow the fast track route 70% will need to be low-cost social rent and 30% intermediate housing. If the housing is not C3 units then depending on the product proposed, an affordable housing contribution will still be required, to be spent elsewhere in Lambeth (if shared living is proposed for example). In the case of student housing, provision of affordable student accommodation will apply (local plan policy H7).

The site allocation facilitates delivery of mix-used development incorporating cultural uses, residential and retail as well as potentially office and/or workspace which have good potential to support the economy but also potential to reduce crime and fear of crime through increased passive surveillance at all times of the day/night. Improved health and well-being of the local community may also result from these landuses. The re-provision of a range of retail and food and drink uses with active ground floor frontages at the site would positively contribute to liveable mixed-use physical and social environments and increase access to, enjoyment of and understanding of cultural sites, features and areas, that make up the South Bank Strategic Cultural Area. The site allocation contributes to improved social cohesion, by being beneficial to disadvantaged groups through providing affordable housing, and potentially affordable workspace (if office floorspace is proposed) and employment opportunities.

The site allocation would enable more people to benefit from its location with exceptional public transport accessibility where national rail, tube and bus services can be accessed, river commuter transport, together with easy access to the amenities of the central activities zone (CAZ), London city and social infrastructure such as St Thomas's Hospital and Evelina London Children's Hospital. The site allocation policy also has good potential to promote accessible and inclusive environment and encourage walking, cycling and use of public transport, particularly through improved public realm, new vibrant and attractive pedestrian routes on the eastern and western boundaries of the site to give access between Queen's Walk and Upper Ground and proposed new piazza adjacent to Bernie Spain Gardens. The allocation policy specifies that development will be expected to contribute to projects to improve conditions for cyclists and pedestrians and reduce through-traffic in the vicinity of the site. Consideration of community safety early in the design process of the development will result in enhancing feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Waterloo area. Improved feelings of community safety results in wide ranging benefits including many equality groups for example, older people, younger people, those of certain faiths, LGBTG+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. To further assist, this site allocation policy should require contribution to maintenance of existing open spaces as development of the site will likely result in significant increased usage of existing parks and open spaces (change already incorporated in SA DPD). As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

The site abuts Bernie Spain Gardens; therefore, it is likely that residents on the site will benefit from the visual effects of the green space (design of buildings/outlooks on site should enable this) and/or easy access to green space. Despite this, the site is still within an area of open space deficiency for district, metropolitan and regional parks, and also access to nature deficiency so it will be important to incorporate areas of habitat appropriate to the site where possible, for example brown roofs. Inclusion of on-site biodiversity improvements should facilitate green stepping-stones / green corridors for species and respond positively to adjoining Bernie Spain Gardens. Extensive new green infrastructure (UGF) will improve health and well-being for those living, working and visiting in the area, as well as contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. The mixed-use nature of the development means delivery of decentralised heating may be more feasible. Major development has

potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the Gabriels' Wharf and Princes Wharf site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to preserve the significance (including setting) of heritage assets, in particular Westminster World Heritage Site, South Bank Conservation Area, Old Barge House Ally Conservation Area (in neighbouring Southwark borough). The site is identified as not appropriate for a tall building. The site allocation policy provides further site-specific guidance and design principles on building heights, views and townscape and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and townscape and therefore positive effects on the achievement of SustA Objective 8.

It is considered that the proposed site allocation is likely to have positive impacts on the local economy and employment opportunities. Site allocation policy makes clear there is particular opportunity on this site to provide job and training opportunities for local people in the creative and cultural industries and hospitality sector. Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. Provision of small and medium sized units for independent businesses and culture uses could potentially be of benefit to some protected groups who wish to set and grow businesses in the borough, but also the wider community in this highly accessible part of the borough. Positive effects on SustA objectives such as 2, 5, 16 and 18 are expected.

The site is a brownfield site that is currently underutilised. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and re-provision of the cultural, offices and new households to the site which will support local economy. Positive effects on the economy (ie SustA Objectives 16-18 are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Upper Ground. This will ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Overall, the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be medium-long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA17: 330-336 Brixton Road, SW9

Proposed Site Allocation: Redevelopment should include replacement office and community floorspace of equivalent or better functionality, new light industrial workspace appropriate to the Brixton Creative Enterprise Zone and new housing, including affordable housing.

Sustainability Appraisal (SustA) Objective	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / ++
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.	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ / ++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ / ++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0 / ?
11. To create, manage and enhance green infrastructure.	+ / ++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ / ?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ / ?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 / ?
15. To improve air quality and limit exposure to poor air quality.	+ / ?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development incorporating residential with re-provision of community, creative industry and office floorspace. It provides essentially new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold will range from 35% to 50% as the site is in a mix of public and private ownership. To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.</p> <p>Provision of light industrial workspace and replacement office floorspace provides employment and business opportunity for local people and contributes to the local economy. It also reduces the need for local people to travel for employment and training opportunities.</p>	

The site allocation will provide replacement of community floorspace for clinical facility (unless the existing clinical facility is reprovided elsewhere). Local Plan policy S2 provides that such buildings and facilities be designed to be flexible, adaptable, promote social inclusion and sited to maximise shared community use of premises where practical. The proposal is likely to result in involving facilities that appeal to a wider range of people and being facilities that can be used for longer hours and weekdays as well as weekends. It is recommended the site allocation policy make specific reference to policy S2 (recommendation since incorporated into SA DPD). Reprovision of existing quantum of office floorspace provides opportunity for improved accommodation for existing users of WeAre336 (a registered charity that supports disabled people and their organisation by providing an accessible disability hub). This has potential to significantly improve the accessibility of the building, and indeed of all buildings on the site and have positive effects on a range of SustA Objectives such as 2, 3, 5, 7, 16 and 18.

The site is in a good location with relatively easy access to key services and facilities in Brixton including for example shopping areas, gyms/leisure centres, cultural activities in the area, local green spaces, public transport (although PTAL rating 2), employment areas and healthcare. The site allocation would enable more people to benefit from its location with exceptional public transport accessibility where national rail, tube and bus services can be accessed, together with easy access to the amenities of Brixton town centre. Development will be car-free, and loss of the petrol station will have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has good potential to promote accessible and inclusive environments and encourage walking, cycling and use of public transport. The allocation facilitates the reduction of off-street parking fronting Brixton Road, the reduction of vehicle crossovers and associated improvements to public realm for pedestrian safety. Creation of a pedestrian access to the development site from Winans Walk would be desirable. Improved pedestrian safety will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children. Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Brixton area. As the site allocation facilitates delivery of mix-used there will be good potential to reduce crime and fear of crime through increased passive surveillance at all times of the day/night. The site allocation contributes to improved social cohesion, by being beneficial to disadvantaged groups through providing affordable housing, affordable workspace and employment opportunities and community space. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area and the allocation policy states that soft landscaping should be incorporated on the Brixton Road frontage that will enhance the visual attractiveness of the site and provide a SuDS function. This will also contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower

income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses. Loss of the petrol station will result in reduce vehicle movements in and out of the site and will contribute towards improved air quality of the immediate area (positive effects on SustA Objectives 15 as well as 1, 2 and 7). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the 330-336 Brixton Road site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. The site is identified as not appropriate for a tall building. Heritage assets are appropriately acknowledged and protected by the allocation policy. The site allocation recognises the petrol station with forecourt canopy, totem sign and retail unit harms the appearance of the conservation area and removal of the car-dominated front forecourts will improve the streetscape and contribution to townscape.

The site is a brownfield site that is currently underutilised. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the provision of light industrial workspace, re-provision of office floorspace and increased households to the site which will support local economy. Positive effects on employment opportunities can also be realised through re-provision of community space, including We Are 366 – particularly for disability groups. The comprehensive mixed used proposal for the site would result in optimising land value at the site and bringing forward modern premises for employment, community and residential use, but they will need to be designed carefully to reduce adverse effects, for example resulting from light industry on amenity of on-site and surrounding sensitive uses. The site allocation also offers access to skills, training and employment opportunities to local residents. However, the loss of service station at the site may result in some adverse effects (at least in the short to medium term) for local businesses and people who rely on their vehicles to do their jobs / daily activities and may result in longer journeys/increased pressure for other service stations. Positive effects on the economy (ie SustA objectives 16-18 are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the office and light industrial/creative workspace uses and are considered permanent in nature, in so far as one can reasonably forecast.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on George Mews, Winans Walk and at Bedwell. This will ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Overall the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

As the site is in multiple land ownership, there is a risk that redevelopment is not undertaken in a comprehensive way, however the wording of the draft SA policy seeks to mitigate this risk by requiring phased development to address the vision for the wider site.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA18: 286-362 Norwood Road, SE27

Proposed Site Allocation: This key town centre site provides significant opportunity for mixed-use redevelopment to include new housing and affordable housing, flexible workspace and shops and food and drink uses that contribute to the renewal of the shopping frontage on Norwood Road. Space behind the Norwood Road frontage can be fully flexible within Class E and could include some space within Classes F1 or F2 if appropriate to the town centre location.

The site has potential for comprehensive, mixed-use development, but given the multiple land ownerships it is likely to come forward in phases. Each phase of development should contribute to and help deliver the overall vision for the site as a whole. Proposals for any part of the site should not compromise or restrict delivery of the overall vision.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / ++
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.	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ / ++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ / ++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0 / ?
11. To create, manage and enhance green infrastructure.	+ / ++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ / ?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ / ?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 / ?
15. To improve air quality and limit exposure to poor air quality.	+ / ?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development incorporating residential, workspace and commercial/community floorspace. It provides for new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold will range from 35% to 50% as the</p>	

site is in a mix of public and private ownership and the site allocation policy makes provision on how affordable housing will be calculated as each phase of development comes forward. To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.

Provision of flexible workspace for creative businesses and commercial space provides employment and business opportunity for local people and contributes to the local economy. It also reduces the need for local people to travel for employment and training opportunities. The site allocation policy encourages particular opportunity to provide jobs and training opportunities for local people within the creative and digital industries or other town centres sectors such as retail, hospitality and leisure. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion.

Community floorspace is expected to be reprovided through provision of flexible Class E space appropriate to the town centre location (so existing church will have opportunity to remain on the site). Local Plan policy S2 provides that new and improved social infrastructure buildings and facilities should be designed to be flexible, adaptable, promote social inclusion and sited to maximise shared community use of premises where practical. The site allocation proposes fully flexible Class E space and can also include Class F1 and F2 space behind Norwood Road frontage. This provides opportunity to deliver facilities that appeal to a wider range of people and types of business and facilities that can be used for longer hours and weekdays as well as weekends.

The site is in an excellent location with easy access to key services and facilities in West Norwood including for example shopping areas, health and leisure centre, cultural activities in the area (picturehouse / theatre), local green spaces, public transport, employment areas (eg West Norwood Key Industrial Business Area (KIBA)) and healthcare. The site allocation would enable more people to benefit from its location with very good public transport accessibility (PTAL 5) where West Norwood (has step-free access) and Tule Hill train stations and several bus services on the high street can be accessed, together with easy access to the amenities of West Norwood/Tule Hill district centre. Development will be car-free, and together with the loss of the petrol station is likely to have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving local air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has good potential to promote accessible and inclusive environments and encourage walking, cycling and use of public transport, particularly through new and reconfigured existing streets to increase permeability through the site, new serviced road to link York Hill and Lansdowne Hill designed safely to accommodate pedestrians and cyclists, improved east-west pedestrians and cyclist connections between York Hill Estate and Norwood Road. The site allocation policy also expects improved public realm at the southern end of Norwood Road with highway improvements to walking and cycling as part of the Health Route Network. High quality public realm within the site serving the whole community should be provided, as should a new public space as a focal point for the town centre. This has potential to offer significant positive effects on local placeshaping and several Sust Objectives such as 7, 8, 9, 2, 3, and 5 (improved accessibility for those with mobility difficulties, some people with disabilities, older people and families with very young children).

Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider West Norwood area. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area and the allocation policy states that new streets should be street-lined and significant levels of greening should be provided through new areas of public realm, including the new public space. This will also contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered that Site 18 Norwood Road site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. The site is considered suitable for a tall building, however design principles related to height and massing are included in the policy to minimise amenity impacts Heritage assets are appropriately acknowledged and protected by the allocation policy.

The site is a brownfield site that is not currently achieving its full potential. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and re-provision of community floorspace, commercial floorspace, flexible workspace and additional households to the site which will support local economy. The site allocation policy seeks to restrict landuses through use of conditions to ensure at least 50% of units are in shop use within the primary shopping area, alongside other town centre and community uses that diversify and activate the high street. Positive effects on the economy (ie SustA Objectives 16-18) are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Lansdowne Hill, Norwood Road, York Hill and the York Hill Estate. This will help ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Overall, the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

As the site is in multiple land ownership, there is a risk that redevelopment is not undertaken in a comprehensive way, however the wording of the draft SA policy seeks to mitigate this risk by requiring phased development to address the vision for the wider site

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep

pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA19: Knolly's Yard, SW16

Proposed Site Allocation: Redevelopment should include intensification of the light industrial workspace appropriate to the KIBA and co-location with new housing (approx. 400-430 self-contained residential units), including affordable housing.

The site provides an opportunity for comprehensive mixed-use redevelopment, which is likely to achieve optimum development capacity and the best place-shaping outcome. However, significant infrastructure improvements are required to ensure that the site is accessible.

Sustainability Appraisal (SustA) objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / ++
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.	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ / ++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ / ++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	+ / ++
11. To create, manage and enhance green infrastructure.	+ / ++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ / ?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ / ?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 / ?
15. To improve air quality and limit exposure to poor air quality.	+ / ?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++
<p>Summary appraisal of proposed site allocation</p> <p>Intensification of light industrial workspace provides employment and business opportunity for local people and contributes to the local economy. It also reduces the need for local people to travel for employment and training opportunities.</p> <p>The site allocation facilitates delivery of a KIBA and colocation with residential uses. It provides essentially new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold will be 50% as the site is in public ownership. To meet fast track requirements</p>	

70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.

The site is in a good location with relatively good, albeit indirect access to key services and facilities in West Norwood and Tulse Hill town centres including for example shopping areas, gyms/leisure centres and local green spaces. However, public transport accessibility is mixed across the site. West Norwood station is approximately 900m from the site and Tulse Hill 950m from the site, but this distance could be reduced through the provision of the footbridge proposed in the site allocation policy and this would benefit the occupiers of the site but also surrounding hinterland. Development will be car-free, and in an air quality focus area, this will have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has good potential to promote accessible and inclusive environments and encourage walking, cycling and use of public transport, particularly through the proposed provision of a fully accessible footbridge that connects to Leigham Vale to the site. This would greatly reduce the distance to Tulse Hill station and accessibility to services, public transport, jobs and shops in Tulse Hill, as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9, 15). The footbridge would also bring significant access improvements for those who live in the hinterland of the site, as they would be able to walk through and have shorter access time to the town centre and station. The sustainability appraisal process identified a recommendation to the draft allocation policy for this site to ensure the footbridge should be fully accessible for pedestrians, cyclists *and those with mobility issues* and relevant wording has been added to the draft allocation policy. This will help achieve more positive impacts for pedestrians, cyclists and those with mobility issues, including some people with disabilities, older people and families with very young children (positive effects on achievement of SustA Objectives 3 and 5).

As the site is bounded on all side by railway lines, redevelopment of the site could reduce crime and fear of crime through increased activity and passive surveillance on the site at all times of the day/night. Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider West Norwood/Tulse Hill area. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area and the allocation policy states that the site should be enhanced with tree planting and green infrastructure through the Urban Greening Factor. Redevelopment also brings opportunity to enhance the existing Site of Importance for Nature Conservation (SINC) on and adjacent to the site. This will also contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 10, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA objectives 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change

on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the Knolly's Yard site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. The site is considered suitable for a tall building, however design principles related to height and massing are included in the policy to minimise amenity impacts. Heritage assets and protected views are appropriately acknowledged and protected by the allocation policy.

The site allocation also appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Leigham Vale, Harpenden Road, Cameron Place and Knolly's Road. This will help ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

The site is a brownfield site that is currently underutilised. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the intensification of light industrial floorspace and addition of new households to the site which will support local economy. Positive effects on the economy ie SustA Objectives 16-18 are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

Overall, the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA20: Tesco, Acre Lane, SW2

Proposed Site Allocation: Replacement supermarket with residential.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ /++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ /++
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.	+ /++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ /?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ /++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ /++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ /++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++ /?
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0 /?
11. To create, manage and enhance green infrastructure.	+ /++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ /?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ /?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 /?
15. To improve air quality and limit exposure to poor air quality.	+ /?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ /++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ /++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ /++

Summary appraisal of proposed site allocation

The site allocation facilitates delivery of a mixed-use development incorporating replacement supermarket and residential. It provides for essential new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold will be 35% as the site is in private ownership. To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.

Replacement supermarket provides employment opportunity for local people, contributes to the local economy and also provides access to essential groceries including fresh and healthy food (positive effects on SustA Objectives 16, 18, 2, 3, 7 and 9). A replacement supermarket helps continue to reduce the need for local people to travel for employment and food shopping needs.

The site is in an excellent location with easy access to key services and facilities in Brixton including for example shopping areas, gyms/leisure centres, cultural activities in the area, local green spaces, public transport, employment areas and healthcare. The site allocation would enable more people to benefit from its location with exceptional public transport accessibility where national rail, tube and bus services can be

accessed, together with easy access to the amenities of Brixton town centre. Easy access to these services and facilitates will result in positive effects on SustA objectives 2, 3, 7.

The site allocation policy also has good potential to promote accessible and inclusive environments and encourage walking, cycling and use of public transport. The allocation facilitates significant improvement to the pedestrian environment, including wider footway along Acre Lane and urban greening; and improved cycle infrastructure. This will increase opportunities for active travel, which will have health and well-being benefits for groups with protected characteristics, as well as helping to improve accessibility for those with mobilities difficulties (such as older people, people with disabilities, families with very young children). The allocation policy makes provision for carparking associated with the replacement supermarket but that such provision is a meaningful reduction from the existing quantum in order to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement.

Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Brixton area. As the site allocation facilitates delivery of mix-used there will be good potential to reduce crime and fear of crime through increased passive surveillance at all times of the day/night. The site allocation contributes to improved social cohesion, by being beneficial to disadvantaged groups through providing affordable housing, employment opportunities associated with the supermarket. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area and the allocation policy states that additional urban greening should be provided in association with a widened footway along Acre Lane (whilst also retaining existing trees of value). This will also contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses. The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the Tesco Acre Lane site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. The site is identified as not appropriate for a tall building. Heritage assets are appropriately acknowledged and protected by the allocation policy.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Baytree Road, Porden Road and Arlington Lodge. This will ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

The site is a brownfield site that is currently underutilised. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and reprovision of the supermarket and new households to the site which will support local economy. Positive effects on the economy (ie SustA Objectives 16-18) are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

Overall, the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA21: 51-65 Effra Road, SW2

Proposed Site Allocation: Redevelopment should include replacement space for the existing community uses, new light industrial workspace appropriate to the Brixton Creative Enterprise Zoe and new housing (approx. 200 – 240 self-contained residential units), including affordable housing.

The site provides an opportunity for comprehensive mixed-use redevelopment, which is likely to achieve optimum development capacity and the best place-shaping outcome. However, given multiple land ownerships, the site may come forward in phases, in which case each phase should contribute to and help deliver the overall vision for the site as a whole. Proposals for any part of the site should not compromise or restrict delivery of the overall vision.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+/++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+/++
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.	+/++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+/++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+/++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+/++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0/?
11. To create, manage and enhance green infrastructure.	+/++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+/?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+/?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0/?
15. To improve air quality and limit exposure to poor air quality.	+/?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+/++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+/++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+/++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development incorporating replacement community use and place of worship residential and workspace. It provides for essential new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold will range from 35% to 50% as the site is in a mix of public and private ownership. To meet fast track requirements</p>	

70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.

Provision of light industrial workspace provides employment and business opportunity for local people and contributes to the local economy, particularly the Brixton Creative Enterprise Zone. It also reduces the need for local people to travel for employment and training opportunities.

The site allocation will provide replacement of community floorspace for the existing Mosaic Clubhouse and place of worship of equivalent or better functionality and affordability and provision for appropriate transitional arrangements. Local Plan policy S2 provides that such buildings and facilities be designed to be flexible, adaptable, promote social inclusion and sited to maximise shared community use of premises where practical. It is recommended the site allocation policy make specific reference to policy S2 (recommendation since incorporated into SA DPD). The EIA Panel recommended that officers add wording to the draft allocation policy for this site to ensure affordability and transitional arrangements for the Mosaic clubhouse are appropriately considered. Officers agreed to do this, and relevant wording has been added to the draft allocation policy. This will help achieve more positive impacts for existing users of the Clubhouse and therefore positive effects on achievement of SustA Objective 5.

The site is in an excellent location with easy access to key services and facilities in Brixton including for example shopping areas, gyms/leisure centres, cultural activities in the area, local green spaces, public transport, employment areas and healthcare. The site allocation would enable more people to benefit from its location with exceptional public transport accessibility where national rail, tube and bus services can be accessed, together with easy access to the amenities of Brixton town centre. Development will be car-free, and in an air quality focus area, this will have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has good potential to promote accessible and inclusive environments and encourage walking, cycling and use of public transport, particularly through improving Rush Common land as an enhanced walking route that is fully publicly accessible and landscaped. The allocation expects pedestrian priority design. It states that landscaping should incorporate children and young people-friendly features such as play-on-the-way parallel playable routes. Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Brixton area. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area and the allocation policy states that Rush Common open space should be retained and enhanced with street tree planting and new green infrastructure long Effra Road. This will also contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate

change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses. The allocation policy also specifically states planning obligations may be sought towards a Flood Alleviation Scheme in the form of SuDs in the vicinity that will help reduce surface water flood risk to the site and neighbouring properties (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the Effra Road site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. Heritage assets are appropriately acknowledged and protected by the allocation policy. The site is not identified as appropriate for tall building development.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Dalberg Road, Masey Mews and Bailey Mews. This will help ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

The site is a brownfield site that is currently underutilised. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and re-provision of community floorspace, light industrial workspace and new households to the site which will support local economy. Positive effects on the economy (ie SustA Objectives 16-18) are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

Overall, the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

As the site is in multiple land ownership, there is a risk that redevelopment is not undertaken in a comprehensive way, however the wording of the draft SA policy seeks to mitigate this risk by requiring phased development to address the vision for the wider site.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA22: 1&3-11 Wellfit St, 7-9 Hinton Rd & Units 1-4 Hardess St, SE24

Proposed Site Allocation: Mixed use development to re-provide industrial floorspace and new housing (approx. 70-90 self-contained residential units) including affordable housing.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+/++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+/++
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.	+/++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+/++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+/++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+/++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0/?
11. To create, manage and enhance green infrastructure.	+/++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+/?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+/?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0/?
15. To improve air quality and limit exposure to poor air quality.	+/?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+/++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+/++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+/++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development incorporating light industrial workspace and residential. It provides for new additional self-contained residential housing to the site (positive effects on SustA objective 6). The affordable housing threshold will be 35% if there is no net loss of industrial floorspace capacity, or 50% if there is a net loss in this capacity. To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.</p> <p>Provision of light industrial workspace provides employment and business opportunity for local people particularly in the creative sectors within the Brixton Creative Enterprise Zone and contributes to the local economy. It also reduces the need for local people to travel for employment and training opportunities. The site allocation policy encourages the particular opportunity to provide jobs and skills training opportunities for local people in the creative and digital sectors.</p> <p>Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion.</p>	

The site is within walking distance of Loughborough Junction Local Centre which offers supermarket, fresh food, fruit and vegetables, pharmacies, public transport. A wider range of services and facilities are available in Brixton major centre, which is about 1km away, and within Herne Hill district centre. King's College Hospital is also close by. The site allocation would enable more people to benefit from its location where national rail and bus services can be accessed (although Loughborough Junction rail station is not step-free), together with relatively easy access to the wider amenities of Brixton town centre. Development will be car-free and improved pedestrian routes, cycle routes and cycle infrastructure will have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has good potential to promote accessible and inclusive environments and encourage walking, cycling and use of public transport. Improved pedestrian movement through the area will have positive benefits for many, including those with mobility difficulties, some people with disabilities, older people and families with very young children. Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Loughborough Junction area. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

New green infrastructure will improve health and well-being for those living, working and visiting in the area. This will also contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses. The allocation policy also specifically states planning obligations may be sought towards a Flood Alleviation Scheme in the form of SuDs in the vicinity that will help reduce surface water flood risk to the site and neighbouring properties (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered SA22 Hardess Street site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. Heritage assets are appropriately acknowledged and protected by the allocation policy (ie Loughborough Park Conservation Area). The site is appropriate for a tall building and the site allocation policy provides guidance on this, particularly in relation to the neighbouring scheme at Higgs Yard.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Wanless Road. This will help ensure achievement of SustA objectives 6 and 7 for both existing residents and consideration of on-site residential amenity for future residents of the site.

The site is a brownfield site that is currently underutilised. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and re-provision of light industrial workspace and new households to the site which will support local economy. Positive effects on the economy (ie SustA Objectives 16-18) are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

Overall the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts on air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA23: Land at corner of Coldharbour Lane and Herne Hill Road, SE24

Proposed Site Allocation: Mixed use development to reprovide existing community use and/or alternative town centre uses within Class E that provide active frontages at ground floor level, with housing on upper floors and light industrial uses along Junction Yard adjacent to the railway arches. Residential units are unlikely to be appropriate in this part of the site.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+ / ++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+ / ++
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.	+ / ++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+ / ?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+ / ++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+ / ++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+ / ++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0 / ?
11. To create, manage and enhance green infrastructure.	+ / ++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+ / ?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+ / ?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0 / ?
15. To improve air quality and limit exposure to poor air quality.	+ / ?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+ / ++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+ / ++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+ / ++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of a mixed-use development incorporating re-provision of existing community use or alternatively flexible town centre uses within Class E that provide active frontages at ground level, new homes on upper levels and light industrial uses outside the town centre boundary along Junction Yard. It provides new additional housing to the site, although it does not specify that this should be self-contained C3 residential units. This suggests that the allocation policy would be open to proposals for other housing products (for example shared living, student housing) which would provide positive effects for certain groups of society (positive effects of SustA objective 5 and 6). Should C3 housing be proposed threshold level of affordable housing will be required and to meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of unit sizes, including family-sized accommodation.</p>	

If the housing is not C3 units then depending on the product proposed, an affordable housing contribution will still be required, to be spent elsewhere in Lambeth (if shared living is proposed for example). In the case of student housing, provision of affordable student accommodation will apply (local plan policy H7). Provision of housing will help address unmet need in Lambeth in particular for affordable housing. Local Plan policy H4 requires the proposed site allocation to deliver a balanced mix of units sizes, including family-sized accommodation (if C3 is proposed).

Provision of light industrial workspace provides employment and business opportunity for local people particularly in the creative sectors within the Brixton Creative Enterprise Zone and contributes to the local economy. It also reduces the need for local people to travel for employment and training opportunities. The site allocation policy encourages the particular opportunity to provide jobs and skills training opportunities for Lambeth residents in the creative and digital sectors. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion.

The site allocation provides for replacement of community floorspace for existing community centre and place of worship with the potential for shared community use. Local Plan policy S2 requires that such buildings and facilities be designed to be flexible, adaptable, promote social inclusion and sited to maximise shared community use of premises where practical. The proposal is likely to result in involving facilities that appeal to a wider range of people and being facilities that can be used for longer hours and weekdays as well as weekends. It is recommended the site allocation policy make specific reference to policy S2 (recommendation since incorporated into SA DPD).

Most of the site is within Loughborough Junction Local Centre town centre boundary, which offers supermarket, fresh food, fruit and vegetables, pharmacies, public transport. A wider range of services and facilities are available in Brixton major town centre which is about 1km away; and at Herne Hill district centre. King's College Hospital is also close by. The site allocation would enable more people to benefit from its location where national rail and bus services can be accessed (although Loughborough Junction rail station is not step-free), together with relatively easy access to the wider amenities of Brixton town centre (including step-free access to the tube). Development will be car-free and improved pedestrian routes, cycle routes and cycle infrastructure will have significant health and wellbeing impacts particularly for people with long-term health conditions, older people, younger people as well as improving air quality and helping to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has good potential to promote accessible and inclusive environments and encourage walking, cycling and use of public transport. Provision of a new route along the railway viaduct to connect through to Higgs Yard and facilitate animation of the railway arches will result in positive effects on sense of place, safety and liveability of the local area (SustA Objectives 1, 3, 7, 8). Public realm improvements including widened footway on Coldharbour Lane will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children. Consideration of community safety early in the design process of the development will result in enhanced feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Loughborough Junction area. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTQ+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The Local Plan has housing targets to meet, and the Infrastructure Delivery Plan sets out the plan for infrastructure to meet this planned growth. This is addressed in part through the CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the draft SA DPD is helping to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions in the normal way. Redevelopment of this site could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area. This will also contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will have significantly higher energy performance than existing housing stock, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be a particular benefit to those on lower incomes occupying the new affordable housing. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will reduce risk of flood damage to homes and businesses. The allocation policy also specifically states planning obligations may be sought towards a Flood Alleviation Scheme in the form of SuDs in the vicinity that will help reduce surface water flood risk to the site and neighbouring properties (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered SA23 Coldharbour Lane/Herne Hill Road site allocation policy responds positively on these matters.

The site allocation policy provides good guidance to positively influence townscape through a series of site-specific design principles and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and therefore positive effects on the achievement of SustA Objective 8. The site is not appropriate for tall building development.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with adjoining railway viaduct. This will help ensure achievement of SustA objectives 6 and 7 for future residents of the site.

The site is a brownfield site that is currently underutilised. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and reprovision of light industrial workspace and new households to the site which will support local economy. Positive effects on the economy (ie SustA Objectives 16-18) are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

Overall, the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future owners and occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability, housing and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social (eg health, education), physical (eg transport, water, wastewater, heating) and environmental (eg open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

SA24 King's College Hospital, Denmark Hill, SE5

Proposed Site Allocation: Hospital and ancillary uses, medical services. Change of use from business and storage use to hospital and associated uses within King's Business Park (KIBA) will be supported to enable reconfiguration and optimisation of the hospital estate for clinical service provision and associated research and development activity.

Sustainability Appraisal (SustA) Objectives	Score/ Likely effects
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	+/>++
2. Promote a healthy community, including reducing health inequalities and the causes of ill health.	+/>++
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.	+/>++
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	+/>?
5. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	+/>++
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	0
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	+/>++
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	+/>++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++
10. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.	0/>?
11. To create, manage and enhance green infrastructure.	+/>++
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	+/>?
13. To protect and manage water resources (including groundwater) and to minimise flood risk.	+/>?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	0/>?
15. To improve air quality and limit exposure to poor air quality.	+/>?
16. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	+/>++
17. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	+/>++
18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	+/>++
<p>Summary appraisal of proposed site allocation</p> <p>The site allocation facilitates delivery of expanded health services and associated research and development activity for the health sector. It is considered that the proposed site allocation policy will likely result in significantly positive effects on social objectives, notably health and wellbeing.</p> <p>The site is in an excellent location with easy access to key services and facilities including for example shopping areas, local green spaces, public transport, employment areas. People who work at the hospital and those that need access to the hospital and its ancillary uses will benefit from its exceptional public transport accessibility where national rail, London Overground and bus services can be accessed, together with easy access to the amenities of Camberwell, Loughborough Junction and Brixton further afield. Moreover, the site will deliver enhanced clinical care facilities and therefore will result in significant positive effects on the achievement of</p>	

SustA objective 2 on health and well-being for people of the local area, Lambeth borough, London and potentially nationally.

The site allocation policy also has good framework to promote accessible and inclusive environment and encourage walking, cycling and use of public transport, particularly through improved generous areas of public realm, widened footways, and permeability for cyclists and pedestrians through the site and linking to the Heathy Route Network. Such public realm improvements will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children. Improved opportunities for active travel, through better pedestrian and cycle routes and cycle infrastructure and car free development – this will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change.

Consideration of community safety early in the design process of the development will result in enhancing feelings of community safety of the site itself and the immediate local area but also contribute to improved sense of safety in the wider Waterloo area. Improved feelings of community safety results in wide ranging benefits for everybody including many equality groups for example, older people, younger people, those of certain faiths, LGBTG+, people of different ethnicities and those with disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

The site allocation does not propose any housing on site which is why it scores neutral with respect to SustA objective 6 on housing. However, the whole site is owned by King's College Hospital NHS Foundation Trust and King's College London and their business is in provision of healthcare. This, together with the fact there are development sites in the surrounding area that are more suitable for residential landuse (including proposed SA22 and SA23 in Loughborough Junction) means the positive effects on health and wellbeing, improved access to health services and care and employment are considered to outweigh the lack of residential provision at this site.

Redevelopment of the site will likely result in an increase of visits by patients and family to and from the site, as well as an increase in those employed at the site. This could put more pressure on existing infrastructure in the local vicinity of the site, including green infrastructure, transport infrastructure and key services/facilities. There is scope in certain circumstances for this sort of site-specific pressure also to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, e.g. S2 on social infrastructure, EN1 on green infrastructure and the policies in transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the draft SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of sustainability appraisal, the allocation policy now makes clear that requirements of Local Plan Policy S2 in relation to new social infrastructure should be addressed.

The site is immediately north of Ruskin Park but separated by railway tracks. Subject to site/building design, layout and orientation, it is possible that patients on the site may benefit from the visual effects of the green space (design of buildings/outlooks on site should enable this. Inclusion of on-site biodiversity improvements should take account of the biodiversity value of the adjacent Ruskin Park. Extensive new green infrastructure (UGF) will improve health and well-being for those living, working and visiting in the area, as well as contribute positively to air quality and climate change mitigation and adaptation (positive effects on SustA objectives 2, 7, 11, 12, 15).

Any new development is likely to result in carbon dioxide emissions, increased water consumption and more waste generation during development construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. The site allocation policy specifies that the existing safeguarded clinical waste transfer facility may be relocated on-site with potential for an increase in capacity of waste management operations (positive effects on SustA objective 14). New buildings will have significantly higher energy performance than existing inefficient buildings, which will reduce future carbon emissions and fuel bills (positive effects on SustA 12, 2). Redevelopment of this part of the hospital estate may facilitate delivery of decentralised heating for the immediate local area. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standard, on-site renewable energy generation and climate change mitigation and adaptation measures such as zero-carbon development. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation and adaptation. Flood risk mitigation on the site will reduce risk of flood damage to the hospital but also help mitigate risk to surrounding local homes and businesses (positive effects on SustA objective 13). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. However, the Lambeth Local Plan has policies to achieve highest standards of sustainability and climate change response, manage impacts of potential effects and it is considered the King's College site allocation policy responds positively on these matters.

The site allocation policy provides good site-specific guidance to preserve the significance (including setting) of heritage assets. The site is not within a location identified as appropriate for tall building development. The site allocation policy provides further site-specific guidance and design principles on building heights, views and

townscape and this will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment and townscape and therefore positive effects on the achievement of SustA Objective 8.

The site allocation appropriately acknowledges neighbour relationships and states the scheme should be designed to minimise impacts on the existing and future neighbours adjacent to the site in particular Northlands Street and Venetian Road, including overlooking, loss of daylight, overshadowing and noise pollution. This will ensure achievement of SustA objectives 6 and 7 for surrounding residents.

It is considered that the proposed site allocation is likely to have positive impacts on the local economy and employment opportunities. An Employment and Skills Plan to secure jobs and training opportunities for Lambeth residents will result in positive impacts on SustA Objective 18. Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. Positive effects on the economy (ie SustA Objectives 16-18) are likely in the short-medium term with regards to planning, design and construction, while positive long-term effects on the economy will be likely from occupation of the site.

Overall, the site allocation policy comprehensively addresses all components of sustainable place-making and it is considered that all SustA objectives (with the exception of SustA objective 6) have been addressed positively in the site allocation policy, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed redevelopment. The Agent of Change principle will apply to mitigate adverse impacts of noise and other impacts air and light pollution.

Timescale and probability

Occupation of the redevelopment on site is likely to be long-term and therefore the positive effects on the various SustA objectives as described above and in the table are also only likely to be realised in the long-term. Short-term adverse effects relating to demolition and construction will inevitably be experienced by owners and occupiers of the site and neighbouring sites. There are local plan policies that seek to mitigate or avoid such adverse effects.

Permanent or temporary

Positive effects on future occupiers of the site in relation to SustA objectives such as access to services, health and wellbeing, liveability and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure (ie social, physical (transport, water, wastewater, heating) and environmental (open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. Adverse effects related to demolition and construction are considered to be temporary.

Stage B5: Monitoring significant effects

- 4.14 The SEA Directive requires that the Environmental Report (in this case the SustA report) include details of the proposed monitoring process. It is essential that the performance of the Local Plan and SA DPD are regularly monitored to ensure that it is meeting its objectives and that any negative impacts are minimised/eliminated. This monitoring will also be key to ensuring that the Local Plan and SA DPD remain current and relevant. Revisions to the Local Plan and SA DPD may also be necessary in light of changes in legislation.
- 4.15 In terms of the monitoring itself, the Monitoring Framework in the Lambeth Local Plan provides a range of performance indicators that will also be applicable for the SA DPD. Progress with implementation of the site allocations will be reported in the Council's annual Authority Monitoring Report.

5. CONCLUSION

- 5.1 Lambeth Council has begun preparation of the Draft Site Allocations Development Plan Document (SA DPD). The Draft SA DPD will form part of the statutory development plan for Lambeth, alongside the revised Lambeth Local Plan, the London Plan 2021 and South Bank and Waterloo Neighbourhood Plan 2019. It will therefore be part of the suite of policy documents that help deliver sustainable growth, investment and opportunity in Lambeth, along with the revised CIL Charging Schedule and emerging supplementary planning documents. It will also support implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and emerging Climate Action Plan.
- 5.2 The Draft SA DPD includes emerging site allocation policies for fourteen sites, distributed across the borough. All have potential to deliver housing alongside commercial uses, apart from two that relate to hospital campuses. The guiding approach in developing the draft site allocation policies is design-led optimisation of development capacity, as required by London Plan policy.
- 5.3 Sites are included in the Draft SA DPD for one or more of the following reasons:
- to set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver;
 - to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies;
 - to articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships;
 - to persuade landowners to consider the potential for optimising the development capacity of their land and help deliver key place-making objectives, where they might otherwise be uncertain about what would be supported;
 - to signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan;
 - to enable key strategic infrastructure to come forward in a timely way.
- 5.4 In the absence of a SA DPD for the borough, the likely situation would be that such sites would not necessarily achieve their full potential, be brought forward successfully and public benefits might not be delivered.

- 5.5 This report has provided an appraisal the reasonable alternatives for the proposed 14 site allocations, and an appraisal of the draft site allocation policies proposed. Overall, the appraisal has concluded that the site allocation policies comprehensively address all components of sustainable place-making and it is considered that all SustA objectives have been addressed positively in the site allocation policies, taking into account the context of the site and surrounding area. Provided local plan policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed site allocation policies.
- 5.6 However, it will be important for infrastructure to keep pace with population growth. Local Plan policies provide good context and provision for the different kinds of infrastructure required to meet current and future demands. Accordingly, much required infrastructure is planned. However, there may be uncertainties about the delivery of essential infrastructure required for growth. These primarily relate to timing – there is risk that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front before occupation of development. This will also apply to upgrading infrastructure. For example, enabling step-free access at public transport stations. A site allocation is not going to worsen the problem of lack of step-free access, but the indirect consequence is that those using the site will experience that lack of step-free access. Mitigation to address this is that all the new development proposed under the Draft SA DPD (as well as from other development) will bring with it Community Infrastructure Levy (CIL) payments that can contribute towards providing step-free access in accordance with the approach identified in the Infrastructure Delivery Plan.
- 5.7 On the whole, it is considered that the Draft SA DPD has been produced with the premise of sustainable patterns of urban development actively borne in mind. Where appropriate, SustA recommendations have been made to improve site allocation policy. Recommendations that have been incorporated into the Draft SA DPD include specific reference to Local Plan policy S2 (new or improved social infrastructure), that the footbridge references in Draft Site Allocation 19 is fully accessible for pedestrians, cyclists *and those with mobility issues*, and the EIA Panel recommended that officers add wording to the draft allocation policy for site 21 to ensure affordability and transitional arrangements for the Mosaic clubhouse are appropriately considered.