

**Site Allocations Development Plan  
Document: Proposed Submission Version  
(Regulation 19)**

**Sustainability Appraisal**

**January 2024**

  
**Lambeth**

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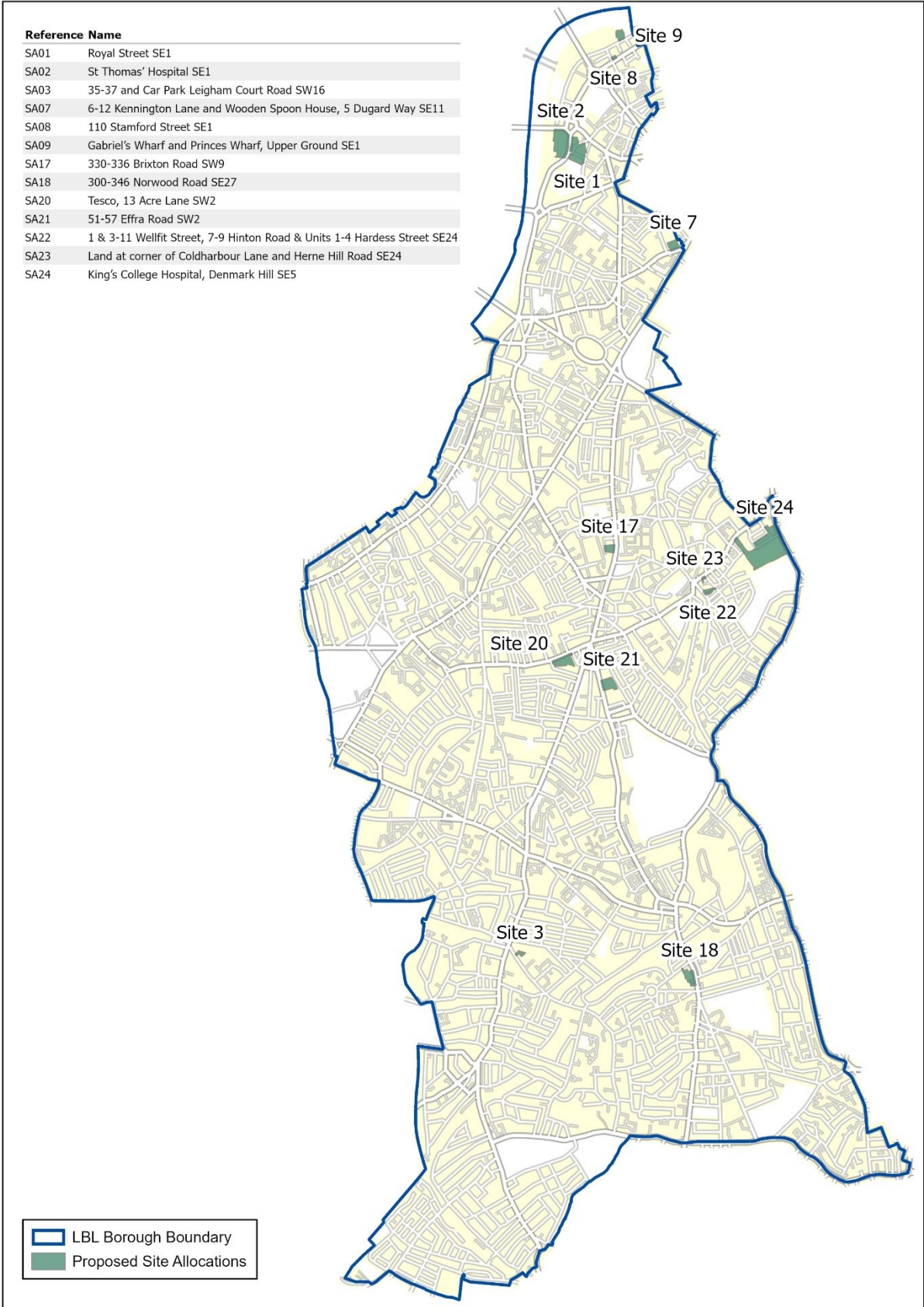
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# 1. INTRODUCTION

## What is this report and what is the SADPD PSV?

- 1.1 This Sustainability Appraisal has been drafted to support the preparation of Lambeth's Site Allocations Development Plan Document - Proposed Submission Version (SADPD PSV).
- 1.2 The SADPD 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 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.
- 1.3 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.
- 1.4 The SADPD PSV includes emerging site allocation policies for thirteen sites, distributed across the borough (see Map 1). All have potential to deliver housing alongside commercial uses, apart from two that relate to existing hospital campuses. Of these thirteen 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 These existing allocations will be superseded on adoption of the SADPD.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 will be unaffected by the SADPD and will remain as they are. The numbering of the proposed allocations in the SADPD PSV is designed to work alongside the numbering of the existing allocations in the Local Plan 2021.

### Map 1: Location of Site Allocations in the SADPD PSV



1.5 Sites are included in the SADPD PSV 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.

1.6 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 currently 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.

1.7 The guiding approach in developing the 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).

- 1.8 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 SADPD PSV. 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.
- 1.9 This report is the Sustainability Appraisal (SustA) report for the SADPD PSV. Section 19 of the Planning and Compulsory Purchase Act 2004 requires local authorities to undertake a SustA for Development Plan Documents (DPDs). 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 SADPD PSV.
- 1.10 This document represents the second stage (Stage B) of the SustA for the SADPD PSV, following on from the SustA Scoping Report in 2020 (Stage A). The SustA of the SADPD PSV will incorporate Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) into a single framework. The method used for SustA and Scoping Report is based on that which was developed for the SustA of the Local Plan adopted in 2021. This is considered appropriate given the SADPD is intended to supplement and update the existing policies within the Local Plan 2021.
- 1.11 The SustA has been 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. This is the second iteration of the SustA, with

the earlier SustA having focused on the draft SADPD which underwent Reg 18 consultation over six weeks between January and February 2022.

- 1.12 The SustA process has been carried out alongside the preparation of the SADPD PSV, and where applicable, makes recommendations to enhance potential positive outcomes and minimise negative outcomes of the proposed draft site allocation policies. This SustA Report is subject to public consultation alongside the SADPD PSV. The SustA may be updated to reflect future modifications made to the SADPD identified during its Examination, where this is deemed necessary.

## **Purpose of this Sustainability Appraisal Report**

- 1.13 This report presents the sustainability appraisal work on the SADPD PSV. The SustA process assists in determining the impact the SADPD PSV 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 SADPD for Regulation 19 consultation.

- 1.14 This SustA report is organised into the following sections:

- Section 2 presents a brief overview of SustA approach
- Section 3 sets out the process of SustAReport 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 sets out Monitoring and next steps
- Section 6 is the Conclusion.



## **Consultation**

- 1.15 This SustA Report is subject to public consultation alongside the SADPD PSV. This 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 online for the opportunity for public consultation.

## 2. SUSTAINABILITY APPRAISAL APPROACH

### Background

- 2.1 This section explains the approach the Council is taking to the SustA of the SADPD PSV and how this sits with the various legal duties.
- 2.2 The SustA process is an iterative process which informs the drafting of development 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 SustA and SEA methodology. Overall, the SustA will assess the extent to which the SADPD PSV will help to achieve relevant sustainability (environmental, economic, social), health and equality objectives.
- 2.4 The SustA needs to be proportionate and appropriate to the type of plan and policies under consideration. As stated above, the SADPD 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 SADPD. All three of these development plans have undergone SustA / 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, SustA, 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 a [SustA](#) which included an equalities impact assessment. The Inspector for the Lambeth Local Plan found the SustA to be 'wide ranging and thorough' (para 40 of the [Inspectors Report](#)). As mentioned above, this SustA builds on the approach to the SustA of the Local Plan adopted in 2021, updating this where required.

2.5 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

2.6 The 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 DPDs.

2.7 The European Directive 2001/42/EC (SEA) requires that DPDs be subject to a 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.

2.8 Table 1 below sets out the requirements of the SEA Directive and where they are covered in the SustA of the SADPD PSV.

**Table 1: How the requirements of SEA Directive are met in this SustA**

| 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<br>(separate report) |

2.9 The SustA extends the concept of SEA to include economic and social concerns. Under the Planning and Compulsory Purchase Act 2004, Local Authorities must undertake a Sust A for each of their DPDs. The SustA is therefore a statutory requirement for DPDs along with SEA. It is best practice is to incorporate the requirements of the SEA Directive into a wider SustA.

2.10 The SustA 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

2.11 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.

2.12 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 prior to Reg 18 consultation in 2021. The SADPD PSV has also been presented to the council's Equalities Panel in December 2023.

#### Health and Well-being Impact

- 2.13 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 DPDs (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 SADPD PSV will be assessed against).
- 2.14 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

- 2.15 The council has undertaken a Habitat Regulations Assessment – Screening Analysis on the Draft SADPD 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.
- 2.16 The screening assessment on the SADPD PSV does not identify any likely significant adverse effects on any European Site. Similarly, it is considered that the SADPD PSV will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the SADPD PSV.

## Consultation, Approach and Influence of Sustainability Appraisal to date

- 2.17 A 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.
- 2.18 The Scoping Report provided a summary of the environmental, social and economic conditions in Lambeth (baseline information) and the proposed SustA Framework for the appraisal process. It built on the SustA 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 SustA was undertaken on the Lambeth Local Plan 2021.
- 2.19 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 3 of the Scoping Report.

## **The Five Stages of Sustainability Appraisal**

- 2.20 In order for the 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 Site Allocations DPDs process that occurs simultaneously.

**Table 2: Sustainability Appraisal Methodology and SADPD preparation process**

| Sustainability Appraisal Process |   | Site Allocations Development Plan Document preparation  |
|----------------------------------|---|---|
| Stage A                          | <p>Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ol style="list-style-type: none"> <li>1. Identify other relevant policies, plans and programmes, and sustainability objectives</li> <li>2. Collect baseline information</li> <li>3. Identify sustainability issues and problems</li> <li>4. Develop the sustainability appraisal framework</li> <li>5. Consult the consultation bodies on the scope of the sustainability appraisal report</li> </ol>   | <p>Pre-production: review of the proposed site allocations, engagement and evidence gathering</p> <p><b>Outcome: Scoping Report 2020</b></p>  |
| Stage B                          | <p>Developing and refining alternatives and assessing effects</p> <ol style="list-style-type: none"> <li>1. Test the Draft SADPD objectives against the sustainability appraisal framework</li> <li>2. Develop the Draft SADPD options including reasonable alternatives</li> <li>3. Evaluate the likely effects of the Draft SADPD and alternatives</li> <li>4. Consider ways of mitigating adverse effects and maximising beneficial effects</li> <li>5. Propose measures to monitor the significant effects of implementing the Draft SADPD</li> </ol> | <p>Consultation on Draft Site Allocations Development Plan Document in preparation of regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p><b>Outcome: Sustainability Appraisal Report 2021</b></p> |
| Stage C                          | <p>Preparing the Sustainability Appraisal Report 2024</p>   | <p>Prepare the SADPD Proposed Submission Version</p>  |
| Stage D                          | <p>Seek representations on the sustainability appraisal report from consultation bodies and the public</p>  | <p>Seek representations on the publication of the SADPD (regulation 19) from consultation bodies and the public.</p>  |
|                                  |   | <p>Adoption</p>   |
| Stage E                          | <p>Post adoption reporting and monitoring</p> <ol style="list-style-type: none"> <li>1. Prepare and publish post-adoption statement</li> <li>2. Monitor significant effects of implementing the SADPD</li> <li>3. Respond to adverse effects</li> </ol>   |   |

2.20 This report forms the second and third stage (Stage B and Stage C) of the SustA of the SADPD and assesses and evaluate the likely effects of the SADPD PSV 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 the 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 each site comprehensively, many issues are largely dependent upon implementation, and to an extent the policies from other DPDs and upon matters outside the remit of planning. 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 SADPD 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 SADPD, and other DPDs 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 SADPD (and other DPDs) 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 SADPD would be. 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 SADPD 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 SADPD has relied on the SustA material included in the SustA Scoping Report for the 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.
- 3.4 Officers have undertaken a review relevant plans and programmes published since the initial Scoping Report was published in 2020 (Table 3 below). Key national, regional and local strategy and policy documents published have been considered to ensure the baseline established in the SustA Scoping Report remains relevant. This includes recent revisions to the National Planning Policy Framework (NPPF) in December 2023, emerging legislative and policy changes associated with the Levelling-Up and Regeneration Act, alongside documents published by the Greater London Authority (GLA), and the London Borough of Lambeth (LBL).
- 3.5 Each document was reviewed to identify key baseline indicators, and the extent to which the existing sustainable considerations should be accounted for. This ensures that the key sustainability issues identified for the plan area remain relevant, and continue to be effective for the purposes of appraising the SADPD PSV.

**Table 3: Review of plans and programmes published since Scoping Report**

**National Plans and Programmes**

| Document   | Summary  |
|--|--|
| <a href="#">NPPF 2023</a>  | The National Planning Policy Framework sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally prepared plans can provide for sufficient housing and other development in a sustainable manner. Preparing and maintaining up-to-date plans is seen as a priority in meeting this objective. The key changes include reforms to housing delivery, changes to the five-year housing land supply and delivery requirements, changes to the assessment of housing supply, greater flexibility for local authorities in assessing local housing need, support for specific categories of housing, and protection against out of character residential developments. |
| <a href="#">National Design Guide</a>  | The national design guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms part of the government’s collection of planning practice guidance and should be read alongside the separate planning practice guidance on <a href="#">design process and tools</a> .  |
| <a href="#">Biodiversity Net Gain</a>  | In England, BNG is becoming mandatory under <a href="#">Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)</a> . It is expected to be introduced in 2024. BNG is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact (‘net gain’) on biodiversity, compared to what was there before development.  |
| <a href="#">Levelling Up and Regeneration Act 2023</a>                               | The Act provides a framework for reforming the planning system. Most importantly for the SA process, the Bill proposes to replace the current SEA regime with a new requirement for Environmental Outcomes Reports. More detail relating to the specific requirements of EOR was consulted upon by Government from March 2023; however, at present the requirement for SEA remains as set out in existing legislation.   |
| <a href="#">2030 Strategic framework for international climate and nature action</a> | The Integrated Review (IR) Refresh makes clear that “the UK’s first thematic priority remains tackling climate change, environmental damage and biodiversity loss, given the urgency of making progress before 2030”. This Strategic Framework sets the direction for the UK’s integrated approach to international action on nature and climate to 2030. The framework sets out an ambitious vision for 2030, to keep 1.5°C alive by halving global emissions; build resilience to current and future climate impacts; and halt and reverse biodiversity loss.  |

**Regional Plans and Programmes**

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| <a href="#">The London Plan 2021</a>   | The London Plan 2021 is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. Every London borough local plan must be in general conformity with the London Plan. Together, the policies in the London Plan and in each borough’s Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans once made. |
| <a href="#">Optimising Site Capacity – A design led approach 2023 (London Plan Guidance)</a> | The guidance sets out how the design-led approach, set out in Policy D3 of the London Plan, should be applied. This approach is the process of setting site-specific design parameters and codes for development sites to provide clarity over the future design. It should be used to determine the most appropriate form of development on a site.   |
| <a href="#">Thames Estuary 2100</a>  | The updated Thames Estuary 2100 Plan (2023) sets out the link between our high-level aims and objectives and what we need to do to realise them.   |

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## Borough Level Plans and Programmes

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| <a href="#">The Lambeth Plan 2021</a>   | <p>The Local Plan sets the vision and objectives for the spatial development of the borough within the context of London's regional development strategy, which is currently the London Plan 2016 (consolidated with alterations since 2011). The Lambeth Local Plan covers the fifteen year period from adoption (2015 to 2030). The Local Plan forms part of the statutory development plan for the borough, alongside the London Plan, and South Bank and Waterloo Neighbourhood Plan. Once adopted, the SADPD will also form part of the development plan and should be read alongside these accompanying documents.</p> |
| <a href="#">Lambeth Design Guide SPD 2023</a>   | <p>The role of the Lambeth Design Guide SPD is to support the implementation of the design and related policies within the Lambeth Local Plan by providing additional guidance to developers, landowners, the public, and other stakeholders which seeks to ensure high quality design outcomes for all development.</p>   |
| <a href="#">Lambeth Affordable Workspace SPD 2022</a>                                     | <p>The SPD provides guidance on the implementation of Policy ED2 of the Lambeth Local Plan which secures affordable workspace from larger office developments in parts of Lambeth.</p>   |
| <a href="#">Lambeth CIL Charging Schedule 2022</a>  | <p>Lambeth's new Community Infrastructure Levy (CIL) Charging Schedule came into force on 1 January 2022. It replaces in full the previous CIL Charging Schedule that was adopted in 2014. The new CIL rates will apply to chargeable developments in which planning permission first permits development on or after 1 January 2022.</p>  |
| <a href="#">Waterloo And South Bank Future Neighbourhoods 2030 Strategy November 2022</a> | <p>The Future Neighbourhoods 2030 strategy sets out how Waterloo and South Bank aims to tackle the effects of the climate crisis and become a net-zero neighbourhood. The council believes the neighbourhood could be an exemplar for the borough, with the lessons learned potentially replicated in other neighbourhoods across Lambeth and London more widely.</p>  |
| <a href="#">Lambeth 2030 - Our Future. Our Lambeth</a>                                    | <p>Lambeth 2030 is a Borough Plan for everyone. It sets out how the council will transform and reshape Lambeth's neighbourhoods and equip communities so that the Lambeth we see in 2030 is one that is healthier, safer, sustainable, and active in tearing down deep-rooted inequalities. It represents the beginning of the boroughs journey and collective effort to shape the future of Lambeth.</p>  |
| <a href="#">Lambeth Climate Action Plan 2022 – 2030</a>                                   | <p>Lambeth's Climate Action Plan (CAP) sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. This identifies 5 priority areas for action, which are Adaptation, Buildings and energy, Transport, Waste, consumption and food, and Biodiversity and environmental quality.</p>  |
| <a href="#">Carbon Emissions Report 2020–2021</a>   | <p>This report, published annually, sets out carbon emissions within the council's estate, and the wider borough.</p>  |
| <a href="#">Air Quality Action Plan 2023–25</a>   | <p>The Air Quality Action Plan (AQAP) sets out the concrete steps the council will take to implement the Air Quality Vision, adopted by the council in 2021. This vision commits the council to pursuing more ambitious, longer term air quality targets, breaking the association between inner-London living and poor air quality, and targeting resources and interventions to benefit the most susceptible groups: the young, the elderly, those with a pre-existing health condition, and residents in the most polluted areas.</p>   |

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| <a href="#">Lambeth Transport Strategy 2019 – 2022</a>                   | <p>Lambeth’s Transport Strategy sets out the council’s vision for mobility and accessibility in the borough. It identifies that significant improvements to infrastructure and services, and also changes to the way all of us make travel choices will be needed. It highlights the need to make the best use of the existing network with a radical overhaul of rail provision and by prioritising the most space efficient modes of transport and reducing motor traffic on our road network. It also identifies an urgent need to reduce CO2 emissions in order to meet our climate change objectives and also the need for a renewed emphasis on reducing road danger and in particular the unacceptable risk to vulnerable road users on our highway network.</p> |
| <a href="#">Kerbside Strategy 2023</a>                                   | <p>The strategy sets out the council’s ambitious plans to transform 25% of Lambeth’s kerbside space into places for people, and not just cars.</p>  |
| <a href="#">Parks and Open Spaces Strategic Plan 2020 – 2025</a>         | <p>To provide a diverse range of safe, well managed parks and open spaces that actively improve the quality of life for our residents and visitors; as well as delivering a wide range of environmental, social and economic benefits.</p>  |
| <a href="#">Active Lambeth Strategy 2022 – 2027</a>                      | <p>To embed the benefits of physical activity and sport into the everyday lives of Lambeth residents. The overarching objective include maintaining and investing in Lambeth’s leisure and sports facilities. Making sure facilities are accessible to all young people. Maximising health and wellbeing opportunities for everyone.</p>  |
| <a href="#">Lambeth Creative and Industries Strategy for Growth</a>      | <p>The strategies vision is for Lambeth to be at the forefront of London’s dynamic creative and digital economy. The strategy contains an action plan outlining a range of projects – from changes to planning policy to workspace and initiatives to tackle inequality through the creative and digital sectors.</p>   |
| <a href="#">Economic Resilience Strategy 2022</a>                        | <p>The Economic Resilience Strategy sets out the council’s vision for Lambeth to be the centre for growth industries such as medical technology and life sciences, digital and creative sectors, and the new low carbon economy. The strategy will also enable the delivery of sustainable, inclusive growth where the benefits of investment can be shared through new jobs and access to skills training, affordable new homes and workspace and enhanced public realm.</p>   |
| <a href="#">Lambeth Skills and Employment Strategy 2020 – 2023</a>       | <p>The strategy seeks to develop and improve on residents skills and employment, access to good jobs, fair pay and resilience are key to achieving the ambitions we have set in the Borough Plan and Lambeth’s Economic Resilience Strategy. The key objectives of the report are to overcome the long-term skills and employment inequalities faced by many of our residents; Tackle the current and lasting impact of COVID-19 on livelihoods; and Ensure our skills system is responsive to the rapidly changing needs of the economy and residents now and in the future.</p>   |
| <a href="#">Health and Wellbeing Strategy 2023 – 2028</a>                | <p>The Lambeth Health and Wellbeing Strategy is a plan to improve community health and wellbeing by increasing participation in physical activity and sport at all levels. The strategy aims to encourage active lifestyles – it sets out the priorities that Lambeth Council, the local NHS and wider partner organisations will focus on to protect and improve the health and wellbeing of all who live, work and play in Lambeth.</p>   |
| <a href="#">Lambeth Made Safer for Young People Strategy 2020 – 2030</a> | <p>Over the course of this 10-year strategy, the Council endures to make Lambeth one of the safest places in London to be a child, teenager or young adult. The goals are to reduce the number of victims and perpetrators of serious youth violence every year. To reduce the number of young people involved in the criminal justice system year on year. To address the root causes of serious youth violence. The council will develop and implement a new approach to community engagement and participation. It will identify, acknowledge and address structural racism. It will develop and embed</p>   |

|   |   |
|---|---|
|   | a whole system approach to preventing violence against young people.  |
| <a href="#">Lambeth Made Safer for Young People Strategy 2020 – 2030</a>            | Over the course of this 10-year strategy, the Council endures to make Lambeth one of the safest places in London to be a child, teenager or young adult. The goals are to reduce the number of victims and perpetrators of serious youth violence every year. To reduce the number of young people involved in the criminal justice system year on year. To address the root causes of serious youth violence. The council will develop and implement a new approach to community engagement and participation. It will identify, acknowledge and address structural racism. It will develop and embed a whole system approach to preventing violence against young people. |
| <a href="#">Safer Lambeth Violence Against Women and Girls Strategy 2021 – 2027</a> | This strategy sets out the Council’s vision, approach and its commitments to tackling Violence Against Women and Girls (VAWG) in Lambeth. The Strategy builds upon Five key strategic priorities are to provide specialist support – which meets the needs of our diverse communities; Working together – strengthening partnerships between key agencies; Community response – utilising the expertise and assets of our communities; Children and young people – prioritising education and early intervention; and Reducing harm from perpetrators – identifying and responding to the source of the problem.  |
| <a href="#">Health and Wellbeing Strategy 2023 – 2028</a>                           | The Lambeth Health and Wellbeing Strategy is a plan to improve community health and wellbeing by increasing participation in physical activity and sport at all levels. The strategy aims to encourage active lifestyles, whether that is at home, through travel, at work, or during leisure time. The strategy sets out the priorities that Lambeth Council, the local NHS and wider partner organisations will focus on to protect and improve the health and wellbeing of all who live, work and play in Lambeth.   |

## Stage A2: Baseline Information

- 3.6 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 SADPD in achieving sustainable development.
- 3.7 The detailed baseline review, is included in Appendix 2 to the SustA Scoping Report. Most information is broad and relates to the wider local authority area.
- 3.8 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.
- 3.9 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 4). There will inevitably be a degree of interrelationship between the issues.

**Table 4: Baseline information and SEA Topic**

| Baseline information   | SEA Topic Requirement   |
|--|---|
| <b>SOCIAL</b>  |   |
| 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 |
| <b>ENVIRONMENTAL</b>   |   |
| 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                                     |
| <b>ECONOMIC</b>  |   |
| 18. Local economy and employment   | Material assets, population   |
| 19. Regeneration and efficient use of land   | Material assets, population   |

3.10 A brief summary of the current baseline in Lambeth is provided in order to understand whether the key sustainable issues outlined in the Scoping Report remain relevant. This information reflects the latest census data collected in 2021, alongside other releases from Government, Office for National Statistics, GLA, LBL and its partners, as set out in the table above.

## Population

- 3.11 Between the last two censuses (held in 2011 and 2021), the population of Lambeth increased by 4.8%, from around 303,100 in 2011 to around 317,700 in 2021. The population here increased by a smaller percentage than the overall population of London (7.7%), and by a smaller percentage than the overall population of England (up 6.6% since the 2011 Census). The GLA estimate a continued growth of Lambeth's population from 334,724 to 346,279 in 2028.
- 3.12 Between the last two censuses, the average (median) age of Lambeth increased by two years, from 31 to 33 years of age. Lambeth had a lower average (median) age than London as a whole in 2021 (35 years) and a lower average (median) age than England (40 years).
- 3.13 There are slightly more male than female residents in Lambeth – around 159,346 (49.5%) females compared to 162,467 (50.5%) males. It is estimated 10% of the Lambeth population identifies as LGBTQ+
- 3.14 In the latest census, around 186,600 Lambeth residents said they were born in England. This represented 58.7% of the local population. The figure has risen from just under 176,200 in 2011, which at the time represented 58.1% of Lambeth's population.
- 3.15 Lambeth is one of the most ethnically diverse boroughs in the UK. Around 55% of Lambeth's population is White – with 41% of Lambeth's population specifically identifying as White British or Irish. 43% of Lambeth's population is Black, Asian, or Multi-ethnic. 63% of Lambeth's children and young people are Black, Asian, or Multi-Ethnic compared with 21% nationally.
- 3.16 Half of Lambeth households (50.2%) are deprived in at least one dimension of deprivation (dimensions are education, employment, housing, and health). Nearly 1 in 5 (18.62%) are deprived in at least two dimensions. This is significantly lower than in 2011, where this was found to be 60.14% and 18.26% respectively) and roughly on par with the national and London averages.
- 3.17 Some groups of residents are significantly more likely to live in deprived households than others. Residents who are Black / Black British and residents who are of 'Other'

ethnic backgrounds are over two times more likely to live in deprived households than their White British / Irish counterparts. Social renters are also over three times more likely to live in deprived households compared to private renters, and over four times more likely compared to private renters, and over four times more likely compared to owner-occupiers.

### Health

- 3.18 The health of people in Lambeth is varied compared with the England average. Lambeth is one of the 20% most deprived districts/unitary authorities in England and about 23.4% (12,295) children live in low-income families.
- 3.19 Life expectancy is 5.4 years lower for men and 4.7 years lower for women in the most deprived areas of Lambeth when compared with the least deprived areas.
- 3.20 In 2021, 49.9% of Lambeth residents described their health as "very good", increasing from 44.0% in 2011. Those describing their health as "good" fell from 32.6% to 31.2%. The proportion of Lambeth residents describing their health as "very bad" decreased from 2.0% to 1.5%, while those describing their health as "bad" fell from 5.8% to 4.5%.
- 3.21 The poorest communities have the worst outcomes across a wide range of measures and the gap is widening between Lambeth and England and also within Lambeth between those with the lowest levels of socio-economic deprivation and those with the highest levels of socio-economic deprivation. This worsens further the experience of some groups within Lambeth, where the intersection of socio-economic deprivation and other characteristics that face systemic discrimination, such as race, mean that the inequality of health outcomes is very significant.
- 3.22 In 2021, 7.8% of Lambeth residents were identified as being disabled and limited a lot. This figure decreased from 10.7% in 2011. The decrease in the proportion of residents who were identified as being disabled and limited a lot was greater in Lambeth (2.9 percentage points) than across London (2.3 percentage points, from 9.4% to 7.1%). Across England, the proportion fell by 1.6 percentage points, from 9.1% to 7.5%.



- 3.23 74% of Lambeth's adult residents are active (Active Lives Survey November 2020). However, although we have one of the most active adult population in London only 18% of Children are reaching the recommended levels of 60 minutes of activity every day.

### Crime, Safety and Justice

- 3.24 Lambeth's State of the Borough report sets out the following core issues on crime, safety and justice. Residents feel safer walking around their local area during the day. Feelings of safety in the evening have fallen noticeable since the start of 2020. As of 2021, *Violence Against The Person* crimes are most common in Lambeth, with Coldharbour and Bishop's wards appearing to be hotspots.
- 3.25 The most reported hate crimes are linked to race and religion, followed by homophobia. Transgender, Antisemitic, Islamophobic, faith and disability hate crimes are less frequently reported. After Covid-19 measures were introduced in March 2020, the number of domestic violence offences in Lambeth rose. In 2021, Lambeth had the 13th highest number of Domestic Abuse Offences per 1,000 population. The proportion of adult residents who see Serious Youth Violence as 'a very big problem' has increased by 12 percentage points since 2020. Around a quarter of residents have experienced sexual harassment in Lambeth. This figure is much higher amongst younger residents and women.

### Emissions and Climate Change

- 3.26 Carbon emissions in Lambeth are falling. Since 2005, Lambeth's borough-wide carbon emissions have fallen by a year on-year average of 3.3%. Continued at this rate, emissions would be approximately 58% below 2005 levels by 2030, and approximately 78% below 2005 levels by 2050.
- 3.27 In 2019 energy use in the home remained the largest source of emissions in Lambeth, and a larger share of the total (41%) than the UK-wide average (27%). Within Lambeth homes, using gas for space and water heating was by far the largest source of emissions. Significant investment will be required to improve the energy efficiency of buildings in Lambeth, and to change the way buildings are heated, in

order to make progress towards net zero emissions. Transport emissions are a smaller share of Lambeth's total (27%) than the UK-wide average (36%), which reflects lower levels of car ownership, higher levels of public transport provision, and its inner London location. The vast majority of Lambeth's reported transport emissions are from on-road petrol and diesel vehicles.

- 3.28 From April 2020 to March 2021, reported greenhouse gas emissions for council-operated assets were 14,388 tonnes, or approximately 1.6% of Lambeth borough emissions. Schools were the largest source of emissions (40% of council total), followed by communal areas of housing estates. Emissions from council-operated assets fell by 9.7% in 2020–21, compared to 2019–20.
- 3.29 In recent years air quality has improved significantly in Lambeth. On Brixton Road, nitrogen dioxide pollution has more than halved since 2014. The number of state primary and secondary schools exceeding legal levels of nitrogen dioxide has fallen from 19 to 2 between 2016 and 2020. However, air quality remains at dangerous levels across the borough, with both short and long-term effects. It is estimated that each year, air pollution kills over 100 Lambeth residents and causes over 750 emergency hospital admissions from lung and heart disease. It has been estimated that particulate air pollution has contributed approximately 15% to Covid-19 mortality.
- 3.30 While annual average NO<sub>2</sub> levels across much of Lambeth are within legal limits (40 µg/m<sup>3</sup>), pollution is significantly worse to the north of the borough in the Waterloo and Vauxhall areas, where legal limits are breached. This is also the case for principal roads through Lambeth – the A3, A23, A24, A202, A205, A214, A301 and A302. The majority of principal roads in Lambeth are controlled by TfL.
- 3.31 Pollution in Lambeth comes from a variety of sources, though road transport, construction and energy use in the home are responsible for the vast majority of local emissions.
- 3.32 Lambeth's Climate Action Plan identifies that the main impacts of climate change in Lambeth are likely to be:
- Warmer and wetter winters
  - hotter, drier summers (which may be especially hot in dense urban areas)
  - more frequent extreme rainfall events, leading to greater risks of flooding

- possible intensification of the urban heat island effect
- increased greenhouse gas concentrations, leading to greater air pollution
- London Heat Island Effect affects the whole of Lambeth to a high degree— affecting night-time temperatures in particular; global warming is also making heat-waves more common generally.

### Employment and Skills

- 3.33 In Lambeth, the percentage who were employed rose from 64.6% in 2011 to 66.1% in 2021, while across England it fell from 56.5% to 55.7%. During the same period, the regional percentage increased from 58.6% to 59.4%.
- 3.34 Lambeth’s Employment and Skills Strategy demonstrates a shift away from lower skilled occupations such as administration, sales and customer service towards managerial, professional and skilled occupations. This means that many residents will be less exposed to the threats to lower skilled roles and the economic challenges emanating from COVID-19 and Brexit that will sit alongside higher skills requirements in the London workforce in the form of higher qualification levels, digital skills and versatility.
- 3.35 However, there are significant groups of our residents who face longer term economic inequities. Our Black residents have a lower employment rate than other ethnic groups and there are similar disparities between these groups in terms of highest level of qualifications achieved.
- 3.36 Young people (aged 16-24) in Lambeth have a higher unemployment rate than compared to the London average and whilst the trend had been falling up to January 2020 this group is at significant risk from the economic challenges triggered by COVID-19. The percentage of people aged 16 years and over who were unemployed (excluding full-time students) in Lambeth fell from 5.8% to 4.6%, while the percentage of people aged 16 years and over who were retired (economically inactive) decreased from 8.9% to 8.3%.

## Housing

- 3.37 Lambeth's draft Housing Strategy identifies average rents being higher than their pre-pandemic levels in all boroughs across the capital – London rents have increased by an average of 15.8% over the year to June 2022, in part due to a substantial decrease in supply, with 35% fewer rental properties listed across London in the first quarter of 2022. Fewer affordable properties render the rental market increasingly inaccessible to many, especially at Local Housing Allowance (LHA) rates.
- 3.38 The average house price in Lambeth in July 2023 was £556,000 (Land Registry), which is slightly higher than the average for London but more than double the national average.
- 3.39 The average median monthly private rent for a two-bedroom property in Lambeth in 2022 was £1,750 per month which is higher than the average rent in London (figures from the GLA).
- 3.40 There is a fairly even split of tenure in Lambeth – with around a third of households being social renters, private renters, and owner-occupiers. Households in Lambeth are considerably less likely to be owner-occupiers than the national average.
- 3.41 In Lambeth, 50.1% of households are single family, 32% are one-person, and 17.9% are other household types.
- 3.42 The council receives over 3,000 new housing applications a year, and there are currently over 40,000 people already on the list. Each year, the council houses about 800 people.
- 3.43 According to the ONS, in 2022 Lambeth had a median housing affordability ratio of 14.36, meaning the average full-time employee in Lambeth could expect to spend 14.36 times their gross annual earnings purchasing a home in the borough. This is compared to 12.54 in London.

## Conclusions

- 3.44 From our review of recent plans and programmes published, on the whole, we consider the key sustainability issues, identified in Table 3 of the Scoping Report and

in Table 4 in the following section of this report, remain relevant and reflect the current baseline position for Lambeth.

- 3.45 A number of recent plans and programmes have highlighted the need for urgent action on issues including public health and community safety, in particular the need to address youth violence and violence against woman. Mitigating the effects of climate change, reducing carbon emissions and improving air quality continue to be core issues for the Council. The delivery of new housing and in particular new affordable housing continue to be a priority issue for the council. Working with statutory bodies, key stakeholders, and local residents, the refinement of site allocation policies following Reg 18 consultation has provided an opportunity to have regard to these matters, and ensure that these latest SADPD PSV gives regard to these.
- 3.46 Key considerations of these for the SADPD PSV are outlined below:
- Revisions to national policy and guidance;
  - Adoption of the London Plan and associated guidance on optimising site capacity affirms the approach taken to drafting site allocations;
  - Emerging Biodiversity Net Gain requirements;
  - Thames 2100 Plan – protection of tidal river defences;
  - Council strategies emphasis on improving the health and safety of residents and visitors.
- 3.47 Where relevant, these matters are considered further in the detailed appraisal for each site allocation (section 4 – Stages B3 and B4).

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

- 3.48 The key sustainability issues set out in Table 5 were identified during the SustA of the 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 LLP remain the most relevant sustainability issues of the SADPD.

**Table 5: Key Sustainability Issues for Lambeth**

| Lambeth key issue  | Considerations   |
|--|--|
| <p><b>Increase the overall supply and mix of housing</b>, including affordable housing.</p>  | <p>Improve access to good quality housing.<br/>Amount of affordable housing.<br/>Sustainable housing.<br/>Housing mix and types.<br/>Addressing overcrowding.</p>  |
| <p><b>Protect and enhance heritage assets</b>, their settings and the wider historic environment as part of reinforcing local distinctiveness and place-making.</p>                          | <p>Built heritage.<br/>Archaeology and Archaeological Priority Areas<br/>Heritage at risk<br/>Designated and non-designated heritage assets including Westminster World Heritage Site<br/>Townscape and Landscape.<br/>Urban design.</p>   |
| <p><b>Provide the essential infrastructure</b> to support population growth.</p>   | <p>Infrastructure provision, including healthcare services, transport, digital connectivity and facilities; and schools.</p>   |
| <p><b>Develop mixed, cohesive, safe communities</b> accessible to all.</p>   | <p>Create mixed and cohesive communities.<br/>Safer communities.<br/>Accessible environments.<br/>Meeting the needs of diverse communities.<br/>Addressing social inequities.<br/>Addressing causes of Multiple Deprivation. Addressing high rates of child poverty.<br/>Tackling crime.<br/>Tackling terrorism.<br/>Addressing fear of crime.</p> |
| <p><b>Provide good access to local services</b> and community facilities within neighbourhoods.<br/><br/><b>Increase public transport accessibility and promote walking and cycling.</b></p> | <p>Good local access to services, green infrastructure and facilities.<br/>Tackling congestion and overcrowding on services and roads.<br/>Increase use of public transport, cycling and walking.</p>  |
| <p><b>Increase the number and variety of jobs in the local economy</b>, including local jobs for local people.</p>   | <p>Increasing jobs, particularly local jobs for local people.<br/>Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups.<br/>Tackling barriers to employment.<br/>Post covid-19 recovery and job retention<br/>Lambeth's role in London and UK economy.</p>  |
| <p><b>Support the growth of key economic sectors</b> through new business development, business retention and inward investment.</p>   | <p>New business development.<br/>Business retention.<br/>Inward investment.<br/>Targeting key economic sectors. Addressing loss of employment land. Affordability of business space.<br/>Economic recovery post covid-19</p>   |

| Lambeth key issue   | Considerations   |
|---|--|
| <b>Create viable, safe and well managed town centres.</b>   | Create viable, safe and well managed town centres.<br>Mixed use development.<br>Protection of cultural and leisure services and facilities.  |
| Support the regeneration and renewal of <b>Opportunity Areas.</b>   | Support the OA objectives by encouraging and delivering the growth potential of OAs; supporting development that creates job opportunities and housing choice for Londoners.   |
| <b>Reduce carbon emissions</b> from residents, businesses, public services and buildings.<br><br>Implement measures to help Lambeth <b>adapt to the consequences of inevitable climate change</b> , including flood risk management | Reducing CO <sub>2</sub> emissions.<br>Promote a low carbon economy.<br><br>Provision of climate change adaptation, including flood risk management, drought and heat risk and associated impacts.   |
| Maximise the <b>efficient use and management of resources</b> , including water, energy and waste.  | Efficient use and management of energy use and supply.<br>Reducing fuel poverty.<br><br>Efficient use and management of water: addressing increasing demand and improve the quality of water.<br><br>Efficient management of waste: increasing recycling rates and self-sufficiency in waste disposal. Waste arisings in construction materials. |
| <b>Health and well-being</b>  | Improving air quality (and meeting EU targets).<br><br>Addressing health inequalities and the health needs of Lambeth's existing and new residents.  |
| <b>Biodiversity, green infrastructure and open space</b>  | Improving and enhancing biodiversity, habitats and green spaces.<br>Increasing amount of green infrastructure  |

## Stage A4: Developing the Sustainability Appraisal Framework

3.49 Table 6 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 Lambeth Local Plan, derived from a review of relevant plans and programmes and baseline collection and key sustainability issues in Lambeth.

**Table 6: Sustainability Appraisal framework**

| Ref.          | Sustainability Appraisal objective   | Appraisal prompt questions<br>Will the Site Allocations Plan...  | SA/SEA | EqIA | HIA | C&S | SEA Directive topic requirement |
|---------------|--|--|--------|------|-----|-----|---------------------------------|
| <b>SOCIAL</b> |  |  |        |      |     |     |                                 |
| 1             | Crime and safety. Ensuring safe communities with reduced crime and disorder.   | 1. Reduce the opportunities to commit crime and engage in antisocial behaviour?  | √      |      |     | √   | Population                      |
|               |  | 2. Create the conditions for communities to develop which will support a reduction in crime and the fear of crime?   | √      |      |     | √   |                                 |
|               |  | 3. Encourage walking and cycling, for instance by reducing likelihood of traffic accidents to pedestrians and cyclists?  | √      |      | √   | √   |                                 |
|               |  | 4. Help address the fear of crime as well as crime itself?   | √      |      |     | √   |                                 |
|               |  | 5. Reduce Lambeth's vulnerability to major challenges such as climate change and water shortages?  | √      |      | √   | √   |                                 |
|               |  | 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. | 1. Protect health and wellbeing and ensure the environment is safe for all and all ages?   | √      | √    | √   | √   | Population, Human health        |
|               |  | 2. Reduce poverty, including child poverty and the impact of income inequality?  | √      | √    | √   |     |                                 |
|               |  | 3. Help reduce health inequalities?  | √      | √    | √   |     |                                 |
|               |  | 4. Help improve mental, emotional and physical health, and wellbeing?  | √      |      | √   | √   |                                 |
|               |  | 5. Help people be healthier for longer?  | √      | √    | √   |     |                                 |
|               |  | 6. Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive?  | √      |      | √   |     |                                 |
|               |  | 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)? | √      |      | √   |     |                                 |
|               |  | 8. Help people to live an inclusive and active lifestyle?  | √      | √    | √   |     |                                 |
|               |  | 9. Promote a sense of wellbeing?   | √      | √    | √   | √   |                                 |
|               |  | 10. Reduce overcrowding including in the private renting sector?   | √      |      | √   |     |                                 |
|               |  | 11. Prevent heat island effect?  | √      |      | √   | √   |                                 |



|   |  |  |   |   |   |   |   |
|---|--|--|---|---|---|---|---|
|   |  | 12. Help promote social cohesion?  | √ |   | √ |   |   |
| 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. | 1. Improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel?<br>Including: <ul style="list-style-type: none"> <li>○ Schools</li> <li>○ Nurseries</li> <li>○ GPs and hospitals</li> <li>○ Libraries</li> <li>○ Places of worship</li> <li>○ Food shops (especially those selling fresh, healthy food)</li> <li>○ Community centres</li> <li>○ Children's play areas</li> <li>○ Sports and recreation facilities</li> <li>○ Open spaces and wildlife habitats</li> <li>○ Police and emergency services</li> <li>○ Banking facilities and post offices</li> </ul> | √ | √ | √ | √ | Population, Human Health                  |
|   |  | 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 planned or in place to meet current or likely future demands.  | 1. Ensure the appropriate infrastructure needed to be in place or planned before redeveloping the site, in particular: <ul style="list-style-type: none"> <li>○ water and sewerage infrastructure</li> <li>○ health 'infrastructure' (facilities and services)</li> <li>○ schools</li> <li>○ green infrastructure</li> <li>○ flood defences</li> <li>○ transport</li> <li>○ decentralised heating</li> </ul>   | √ | √ | √ |   | Population, Human Health, Material Assets |
|   |  | 2. Ensure development to be designed to connect wherever reasonably possible to existing or future planned infrastructure?   | √ |   |   |   |   |
|   |  | 3. Ensure that development and operations will not adversely affect the existing infrastructure?   | √ |   |   |   |   |
|   |  | 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.   | 1. Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups?   | √ | √ |   |   | Human health, Population  |
|   |   | 2. Address housing, cultural, social and employment needs of those with protected characteristics?   | √ | √ | √ |   |   |
|   |   | 3. Provide adequate and equal accessibility for all to buildings and services, in particular for older and disabled people?  | √ | √ | √ |   |   |
|   |   | 4. Encourage development opportunities in those areas in need of economic development?   | √ | √ | √ |   |   |
|   |   | 5. Promote a culture of equity, fairness and respect for people and the environment?   | √ | √ | √ |   |   |
|   |   | 6. Reduce poverty and social exclusion?  | √ | √ | √ |   |   |
|   |   | 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.   | 1. Promote increased supply of housing to meet local needs?  | √ | √ | √ |   | Population, Human Health, Material assets   |
|   |   | 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? | √ | √ | √ |   |   |
|   |   | 3. Provide the mix and type of housing for people, including families, on moderate and lower incomes?  | √ | √ | √ |   |   |
|   |   | 4. Encourage development at an appropriate density, standard (including sustainable housing standards), size, mix and amenity?   | √ |   | √ |   |   |
|   |   | 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 environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place. | 1. Ensure that the amenity of neighbours is not unduly impacted?   | √ |   | √ |   | Population, Human Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage) |
|   |   | 2. To improve amenity by minimising the impacts associated with development?   | √ |   | √ |   |   |
|   |   | 3. Protect and enhance the quality and quantity of open space and the public realm?  | √ |   | √ |   |   |
|   |   | 4. Ensure that development and operations will not affect noise sensitive uses and will reduce other unpleasant environmental factors (e.g. fumes)?                                      | √ |   | √ |   |   |
|   |   | 5. Promote child-friendly buildings and places?  | √ | √ | √ |   |   |

|                      |  |  |   |   |   |   |  |
|----------------------|--|--|---|---|---|---|--|
|                      |  | 6. Help all Lambeth communities feel they are valued and are part of their neighbourhoods?   | √ | √ | √ |   |  |
|                      |  | 7. Promote wellbeing and help to make people feel positive about the area where they live?   | √ | √ | √ | √ |  |
|                      |  | 8. Help people lead environmentally sustainable lives?   | √ |   | √ |   |  |
|                      |  | 9. Prevent overcrowding in public space by ensuring enough space for public movement?  | √ |   | √ | √ |  |
|                      |  | 10. Create an environment that that facilitates community interaction e.g. communal spaces   | √ |   | √ |   |  |
| <b>ENVIRONMENTAL</b> |  |  |   |   |   |   |  |
| 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. | 1. Protect, conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?                       | √ |   |   |   |  |
|                      |  | 2. Enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals)?                                       | √ | √ |   |   |  |
|                      |  | 3. Protect and enhance the townscape/cityscape character, including historical, archaeological and cultural value/potential and its contribution to local distinctiveness? | √ | √ |   |   |  |
|                      |  | 4. Respect visual amenity and the spatial diversity of communities?  | √ |   |   |   |  |
|                      |  | 5. Increase access to, enjoyment of and understanding of, historical, archaeological and cultural sites, features and areas?   | √ | √ |   |   |  |
|                      |  | 6. Protect valued views?   | √ |   |   |   |  |
|                      |  | 7. Identify locations where tall building are acceptable?  | √ |   | √ |   |  |
|                      |  | 8. Aspire to a range of buildings and architecture that reflect the character and cultural diversity of the borough?   | √ | √ |   |   |  |
|                      |  | 9. Protect, enhance or create open space?  | √ | √ | √ |   |  |
|                      |  | 10. Ensure enhancement of the public realm and local distinctiveness?  | √ |   | √ | √ |  |
|                      |  |  |   |   |   |   | Landscape, Cultural Heritage (including architectural and archaeological heritage) |

|    |  |   |   |   |   |  |  |
|----|--|---|---|---|---|--|--|
|    |  | 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 private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport. | 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                      |
|    |  | 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)?   | √ |   | √ |  |  |
|    |  | 3. Integrate new development, especially residential development, with sustainable transport choices?   | √ |   | √ |  |  |
|    |  | 4. Improve accessibility to work by public transport, walking and cycling?  | √ | √ | √ |  |  |
| 10 | Biodiversity. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.   | 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 |
|    |  | 2. Help to protect, increase/improve biodiversity and open space in the borough?  | √ |   | √ |  |  |
|    |  | 3. Help to protect and enhance access to open space and improve the quality of publicly accessible green space?   | √ |   | √ |  |  |
|    |  | 4. Protect and provide for the protection and planting of more trees in the borough?  | √ |   | √ |  |  |
|    |  | 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)? | √ |   | √ |  |  |
|    |  | 6. Bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens?  | √ |   | √ |  |  |
|    |  | 7. Promote a network of green infrastructure?   | √ |   | √ |  |  |
| 11 | Green infrastructure. To create, manage and enhance green infrastructure.  | 1. Help to protect, increase/improve existing green infrastructure or open spaces?  | √ |   | √ |  | Biodiversity, Flora, Fauna, Landscape, Soil, Water, Climatic Factors |
|    |  | 2. Enhance/create good quality and accessible green infrastructure or open spaces?  | √ | √ | √ |  |  |



|    |  |   |   |  |   |  |                                     |
|----|--|---|---|--|---|--|-------------------------------------|
| 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. | 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         |
|    |  | 2. Make waste avoidance, reuse and recycling easy for residents and visitors?   | √ |  | √ |  |                                     |
|    |  | 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.  | 1. Contribute to an improvement of air quality?   | √ |  | √ |  | Human health, Air, Climatic Factors |
|    |  | 2. Use the location and form of buildings to aid dispersion and separate emission sources from people?  | √ |  | √ |  |                                     |
|    |  | 3. Design out places of exposure or features that tend towards accumulation rather than dispersal of pollutants?  | √ |  | √ |  |                                     |
|    |  | 4. Eliminate or reduce the impact of sources?   | √ |  | √ |  |                                     |
|    |  | 5. Reduce emissions of greenhouse gases and exposure to harmful emissions?  | √ |  | √ |  |                                     |
|    |  | 6. Reduce emissions of PM10, NOx and ozone depleting substances?  | √ |  | √ |  |                                     |
|    |  | 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)?   | √ |  | √ |  |                                     |
|    |  | 8. Support the planting of trees?   | √ |  | √ |  |                                     |
|    |  | 9. Promote the 'transport hierarchy' and encourage the use of alternative modes of transport to the private car?  | √ |  | √ |  |                                     |
|    |  | 10. Incorporate natural ventilation where appropriate?  | √ |  | √ |  |                                     |

| ECONOMIC |  |  |   |   |   |   |                             |
|----------|--|--|---|---|---|---|-----------------------------|
| 16       | Local economy. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.   | 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 |
|          |  | 2. Support and prevent loss of local businesses?   | √ | √ | √ | √ |                             |
|          |  | 3. Accommodate new and expanding businesses?   | √ |   | √ | √ |                             |
|          |  | 4. Encourage new investment in the local economy and promote development opportunities for employment?   | √ | √ | √ | √ |                             |
|          |  | 5. Focus growth in growth areas and other highly accessible locations?   | √ | √ | √ |   |                             |
|          |  | 6. Contribute to sustainable tourism?  | √ |   |   | √ |                             |
|          |  | 7. Promote green jobs & sustainable & inclusive growth?  | √ | √ | √ | √ |                             |
|          |  | 8. Bridge the digital divide?  | √ |   |   |   |                             |
|          |  | 9. Promote responsible consumption & production?   | √ |   | √ |   |                             |
|          |  | 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. | 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       |
|          |  | 2. Ensure efficient use of land through maximising densities, exploring a variety of building typologies, where appropriate?   | √ |   | √ |   |                             |
|          |  | 3. Promote the efficient, innovative and multifunctional use of land?  | √ |   | √ | √ |                             |
|          |  | 4. Protect the Borough's soil resource?  | √ |   |   |   |                             |

|    |   |  |   |   |   |   |                             |
|----|---|--|---|---|---|---|-----------------------------|
| 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. | 1. Improve accessibility to employment, especially for local people? | √ | √ | √ |   | Population, Material Assets |
|    |   | 2. Protect local employment land and uses?                           | √ | √ | √ | √ |                             |
|    |   | 3. Provide additional housing near places of work?                   | √ | √ | √ |   |                             |



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

- 3.50 In accordance with Regulation 12(5) of the SEA Regulations, the 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. As 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.
- 3.51 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 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 principal objective of the SADPD is to unlock investment to provide benefits to local residents through the mechanism of site-specific planning policy. The SADPD PSV confirms 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. Given the intended approach and scope of the SADPD, these objectives are explored fully as part of Stage B2 – B4.

### **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 Sites have been included in the SADPD PSV 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, 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.

- 4.6 It is not necessary, or indeed 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. Lambeth's ability to meet its London Plan housing target was demonstrated through the examination of the Lambeth Local Plan. However, through stakeholder engagement and by setting out clear expectations for delivery, the new site allocation policies will help to accelerate delivery of development in the borough, comprising housing (including affordable housing), commercial floorspace and social infrastructure. This will contribute to maintaining the necessary pipeline of new housing and thereby help ensure housing delivery targets continue to be achieved.
- 4.7 Drawing on the considerations listed above, the selection of sites for inclusion in the Regulation 18 Draft SADPD and subsequent SADPD PSV took account of the following:
- a review of the existing site allocation policies within the Lambeth Local Plan 2021 to consider which may need updating;
  - the housing trajectory and supporting evidence examined and as part of the examination of the Lambeth Local Plan 2021 (Topic Paper 10a), which was informed by the GLA SHLAA 2017 and associated calls for sites undertaken by both the GLA and Lambeth as part of that process;
  - requests received for allocation of sites during and since the examination of the Lambeth Local Plan, including those made in response to the Regulation 18 consultation on the Draft SADPD;
  - discussions and subsequent statements of common ground with landowners agreed during the examination of the Lambeth Local Plan 2021;
  - local knowledge of larger sites within Local Plan evidence with potential for development to make more effective use of the land, but that had not come forward successfully over a period of years, informed by monitoring data;
  - discussions with landowners and developers through the development management service within the LPA, informed by knowledge of planning decisions and appeal outcomes that would help inform future development proposals in certain cases; and

- consultation responses at Regulation 18 stage of the Draft SADPD and concurrent and/or subsequent discussions with landowners and local stakeholder representatives (including community groups)
- 4.8 This resulted in the selection of fourteen sites for inclusion in the Regulation 18 Draft SADPD.
- 4.9 Consultation on the draft SADPD took place between 10 January - 22 February 2022. Representations received in response to the consultation largely focused on the fourteen proposed site allocation. In some instances, representations put forward additional sites for consideration, (further details available in the Consultation Statement).
- 4.10 In response to alternative sites, the Council's position is sites have been included in the SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target or other development needs, as this was achieved through the recent examination of the Lambeth Local Plan 2021. Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.
- 4.11 Table 7 below demonstrates that the reasonable alternatives considered by the council which were derived in a systematic manner in the context of the planning policies that will apply.
- 4.12 The reasonable alternatives were revisited following Reg 18 consultation and considered as part of the PSV of the SustA. As set out below the SustA considers any existing site allocations from Lambeth Plan 2021 as Reasonable Alternatives (RAs). In addition, it also tests any substantial changes to the mix and quantum of development that have occurred between Reg 18 draft SADPD and the SADPD PSV.

**Table 7: Generation of reasonable alternative**

| 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><b>SA1 Royal Street SE1</b></p> <p>Site is currently allocated as Site 1 of the Lambeth Local Plan 2021.</p> | <p>Office floorspace, including approximately 30 per cent that is lab enabled to contribute to the growth of the Med Tech cluster. Replacement residential. Cultural facilities and community 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) and cultural venue.</p> | <p><u>Designations</u></p> <ul style="list-style-type: none"> <li>Waterloo Opportunity Area</li> <li>Central Activities Zone: within the CAZ health cluster; the railway arches only fall within the Waterloo CAZ retail cluster</li> <li>Thames Policy Area</li> <li>South Bank and Waterloo neighbourhood area</li> </ul> <p><u>London Plan policies</u></p> <p>SD1<br/>SD4<br/>SD5<br/>H8<br/>HC5<br/>S1 – S2<br/>E1</p> <p><u>Local Plan policies</u></p> <p>H3<br/>ED1</p> | <p><u>London Plan</u></p> <p>SD1<br/>SD4<br/>SD5<br/>H1<br/>H4 – H6<br/>H8<br/>H11<br/>H15<br/>HC5<br/>E1<br/>E3</p> <p><u>Local Plan</u></p> <p>H1 – H5<br/>H12</p> <p>ED1<br/>ED2<br/>ED4<br/>ED6<br/>ED7<br/>ED13<br/>ED14<br/>S1-S2<br/>PN1</p> | <ul style="list-style-type: none"> <li>No loss office workspace 10% of uplift in office space at 50% reduction</li> <li>Include proportion of flexible office space for small businesses</li> <li>Replace quantum of residential including affordable housing at 35% threshold</li> <li>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 special policy area</li> <li>CAZ strategic functions, including</li> </ul> | <p>The site is allocated in the current Lambeth Local Plan 2021 for <i>Health use for the expansion of St Thomas' Hospital to provide clinical and ancillary hospital uses; replacement of affordable housing.</i> This is tested as RA1.</p> <p>No requirement to replace community uses as they are meanwhile temporary uses. However, community and cultural uses could support wider placemaking objectives so have been considered as part of the potential future mix.</p> | <ol style="list-style-type: none"> <li>Replacement affordable housing; health use for the expansion of St Thomas' Hospital to provide clinical and ancillary hospital uses (current site allocation in Lambeth Plan 2021)</li> <li>Replacement residential and office, with additional office to support MedTech Hub, plus flexible ground floor E Class uses</li> <li>Replacement residential and office, with additional housing, plus flexible ground floor E Class uses</li> <li>Replacement residential and office, to support MedTech Hub, plus flexible ground floor E Class uses, alongside cultural and community uses</li> </ol> |

|   |  |  |  |   |   |  |  |
|---|--|--|--|---|---|--|--|
|   |  |  | ED4<br>S1-S2<br><u>PN1</u>   |   | promotion of<br>CAZ specialist<br>health cluster  |  | (option taken forward<br>in SADPD PSV)   |
| <b>SA2 St<br/>Thomas'<br/>Hospital SE1</b>                            | Reconfiguration<br>of hospital<br>facilities to<br>optimise capacity<br>for clinical use<br>and reprovision of<br>Florence<br>Nightingale<br>Museum  | Hospital<br><br>Florence<br>Nightingale<br>Museum          | <u>Designations</u><br>Waterloo<br>Opportunity Area<br><br>CAZ<br><br>CAZ specialist<br>health cluster<br><br><u>London Plan</u><br><u>policies</u><br>SD1<br>SD4<br>SD5<br>HC5<br>S1 – S2<br><br><u>Local Plan policies</u><br>S1<br>ED13               | <u>London Plan</u><br>SD1<br>SD4<br>SD5<br>HC5<br>S1 – S2<br><br><u>Local Plan</u><br>ED13<br>S1 - S2<br>PN1  | <ul style="list-style-type: none"> <li>• CAZ strategic functions, including promotion of CAZ specialist health cluster</li> <li>• Replacement cultural facilities</li> <li>• Replacement healthcare facilities</li> <li>• Westminster World Heritage Site</li> </ul>  | A do nothing approach is not considered appropriate, given the hospital's longer term expansion plans at this site and the significant constraints posed by its location (e.g. Westminster World Heritage Site, Thames Policy Area etc.) | <p>1. Reconfiguration of hospital facilities to optimise capacity for clinical use and reprovision of Florence Nightingale Museum (option taken forward in SADPD PSV)</p> <p>* No other Reasonable Alternative as no scope or proposal to introduce additional or alternative uses</p> |
| <b>SA3 35-37 and<br/>Car Park<br/>Leigham<br/>Court Road<br/>SW16</b> | Mixed use<br>development<br>comprising<br>ground floor<br>commercial<br>floorspace within<br>town centre<br>boundary,<br>flexibility for<br>residential or<br>commercial Use<br>Class E above,<br>Residential to<br>rear of site | Council owned<br>car park and<br>disused public<br>toilets | <u>Designations</u><br>Car park outside<br>town centre<br><br>Public toilets within<br>town centre<br>boundary but not<br>in primary<br>shopping area<br><br><u>London Plan</u><br><u>policies</u><br>SD6 – SD7<br><br><u>Local Plan policies</u><br>ED7 | <u>London Plan</u><br>H1<br>H4-H6<br>H11<br>H15 – H16<br>SD6 – SD7<br>E1<br><br><u>Local Plan</u><br>H1<br>H2<br>H4-H5<br>H7<br>H12 – H13<br>ED1<br>ED7 | <ul style="list-style-type: none"> <li>• Affordable housing – 50% threshold as public land</li> <li>• Office within town centre boundary (no affordable workspace requirement in this location)</li> <li>• Other main town centre uses, in accordance with</li> </ul> | Public sector land   | <p>1. Active frontage ground floor within town centre boundary with town centre uses above plus residential to rear of site</p> <p>2. Active frontage ground floor within town centre boundary plus residential above and residential to rear of site</p>                              |

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|   |  |  |   | ED14<br>PN4   | PN4 (flexible Class E outside primary shopping area); active frontage at ground floor on main road within town centre <ul style="list-style-type: none"> <li>• Front could be suitable for small hotel (but not back b/c not in town centre)</li> <li>• No policy requirement to reprovide car park or toilets</li> </ul> |  | 3. Ground floor commercial floorspace within town centre boundary, flexibility for residential or commercial Use Class E above, residential to rear of site (option taken forward in SADPD PSV)   |
| <b>SA7 6-12 Kennington Lane and Wooden Spoon House SE11</b> | Workspace to reprovide industrial capacity, replacement community uses and new residential | 6-12 Kennington Lane – 1206sqm GIA floorspace plus separate yard in use as a builders' merchant<br><br>Christ the Redeemer Building – 650sqm GIA, four storey building that stands within the yard fronting Kennington Lane (vacant but previously | <u>Designations</u><br>None.<br><br>Not in KIBA (therefore is non-designated industrial land)<br><br>The site is not in an Opportunity Area, the Central Activities Zone or a town centre.<br><br>Site within KOV neighbourhood area<br><br><u>London Plan policies</u><br>E2<br>E4 | <u>London Plan</u><br>H1<br>H4-H6<br>D13<br>E2<br>E4<br>E7<br>S1 – S2<br><br><u>Local Plan</u><br>H1<br>H2<br>H4 – H5<br>H7<br>H12<br>H13<br>ED4<br>S1<br>S2<br>PN8 | <ul style="list-style-type: none"> <li>• No net loss of industrial and intensification of industrial capacity</li> <li>• Potential for residential</li> <li>• 50% AH threshold if loss of industrial capacity</li> <li>• No hotel</li> <li>• No shops, food and drink or office use</li> </ul>                            | The site is in multiple ownerships and could be developed comprehensively or in phases. It is not considered realistic or appropriate to appraise all potential variation of phasing that could come forward as a reasonable alternative. The implications and mitigation of any potential phasing is explored in the appraisal of RAs in the section below this table. This is considered relevant for all RAs. | 1. Workspace to reprovide industrial capacity, replacement community use and a greater amount of residential (option taken forward in SADPD PSV)<br><br>2. Workspace to provide greater industrial capacity with replacement community uses and less residential than RA1 |



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|                                    |   | operating as a community use)<br><br>Wooden Spoon House – approx. 2800sqm GIA medical services with ancillary office space and facilities | E7<br>S1<br><br><u>Local Plan policies</u><br>ED4<br>S1 – S2  |   |  |  |  |
| <b>SA8 110 Stamford Street SE1</b> | Provide residential above and office and/or community use at ground-floor | vacant  | <u>Designations</u> <ul style="list-style-type: none"> <li>Waterloo Opportunity Area</li> <li>Central Activities Zone</li> <li>South Bank and Waterloo neighbourhood area</li> </ul> <u>London Plan policies</u><br>SD1<br>SD4<br><br><u>Local Plan policies</u><br>PN1 | <u>London Plan</u><br>SD1<br>SD4<br>SD5<br>H1<br>H4 – H6<br>H11<br>H15 – H16<br>HC5A(5)<br>HC6B(1)<br>E1<br>E3<br>E10B<br><br><u>Local Plan</u><br>H1<br>H2<br>H4 – H5<br>H7<br>H12<br>H13<br>ED1<br>ED2<br>ED13<br>ED14<br>S2<br>PN1 | <ul style="list-style-type: none"> <li>Affordable workspace 10% of office proposed at 50% reduction</li> <li>CAZ strategic functions</li> <li>Waterloo OA – housing and jobs targets</li> <li>Affordable housing for any residential element, threshold level</li> <li>Active frontage required</li> </ul> |  | <ol style="list-style-type: none"> <li>Provide residential above with office use at ground-floor</li> <li>Provide residential above with community use at ground-floor</li> <li>Provide residential above and office and/or community use at ground-floor (option taken forward in SADPD PSV)</li> </ol> |

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|   |  |  |   | <u>Neighbourhood plan</u><br>P12  |  |  |   |
| <p><b>SA9 Gabriel's Wharf and Princes Wharf, Upper Ground SE1</b></p> <p>The site is currently forms part of Site 9 in the Local Plan 2021.</p> | Residential (which may include an element of extra-care C3 housing) plus offices and/or workspace and replacement cultural, retail and food and drink floorspace | <p>Gabriel's Wharf: shops, food and drink and cultural uses (approx. 906sqm GIA)</p> <p>Princes Wharf: Former TV studio used in association with the former ITV studios adjacent at 72 Upper Ground (3,189sqm GIA)</p> | <p><u>Designations</u></p> <ul style="list-style-type: none"> <li>• Waterloo Opportunity Area</li> <li>• Central Activities Zone</li> <li>• South Bank/Bankside Strategic Cultural Area</li> <li>• Thames Policy Area</li> <li>• South Bank and Waterloo neighbourhood area</li> </ul> <p><u>London Plan policies</u></p> <p>SD1<br/>SD4<br/>SD5<br/>HC5A(4)<br/>E10B</p> <p><u>Local Plan policies</u></p> <p>ED1<br/>ED13<br/>PN1</p> | <p><u>London Plan</u></p> <p>SD1<br/>SD4<br/>SD5<br/>H1<br/>H4 – H6<br/>H11<br/>H15<br/>HC5<br/>HC6B(1)<br/>E1<br/>E3<br/>E10B</p> <p><u>Local Plan</u></p> <p>H1<br/>H2<br/>H4-H5<br/>H7<br/>H8<br/>H12<br/>H13<br/>ED1<br/>ED2<br/>ED13<br/>ED14<br/>PN1</p> <p><u>Neighbourhood plan</u><br/>P12</p> | <ul style="list-style-type: none"> <li>• Affordable workspace - 10% of uplift in office floorspace at 50% reduction</li> <li>• CAZ strategic functions</li> <li>• Waterloo OA – housing and jobs targets</li> <li>• Include proportion of flexible office space for small businesses</li> <li>• Active frontage required</li> <li>• Affordable housing for any residential element, threshold level</li> </ul> |  | <ol style="list-style-type: none"> <li>1. Residential plus reprovision of existing uses: cultural, retail and food and drink</li> <li>2. Residential plus offices and/or workspace and replacement cultural, retail and food and drink floorspace</li> <li>3. Residential (which may include an element of extra-care C3 housing) plus offices and/or workspace and replacement cultural, retail and food and drink floorspace (option taken forward in SADPD PSV)</li> </ol> |
| <p><b>SA17 330-336 Brixton Road SW9</b></p>   | Reprovision of community, light industrial (appropriate to Brixton Creative Enterprise Zone)   | 330 Brixton Road – petrol station and premises (552sqm GIA)  | <p><u>Designations</u></p> <p>Not within town centre</p> <p>Not within KIBA</p>   | <p><u>London Plan</u></p> <p>H1<br/>H4-H6<br/>H11<br/>H15-H16<br/>D13</p>   | <ul style="list-style-type: none"> <li>• No policy protection of petrol station</li> <li>• No net loss of industrial</li> </ul>  | The site is in multiple ownership and could be developed comprehensively or in phases. It is not considered realistic or | <ol style="list-style-type: none"> <li>1. Reprovision of community, light industrial and offices but no residential</li> </ol>  |

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|  | and office uses plus residential  | <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 ancillary floorspace (3553sqm GIA)</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><br/>E1 – E2<br/>E4<br/>E7<br/>S1 – S2<br/>HC5</p> <p><u>Local Plan policies</u><br/>ED1<br/>ED4<br/>ED13<br/>S1</p> | <p>E1-E4<br/>E7<br/>SD7<br/>HC5<br/>S1 – S2</p> <p><u>Local Plan</u><br/>H1<br/>H2<br/>H4-H5<br/>H7<br/>H12<br/>H13<br/>ED1<br/>ED4<br/>ED13<br/>S1 – S2<br/>PN3</p> | <p>floorspace capacity</p> <ul style="list-style-type: none"> <li>• Reprovision of offices</li> <li>• Reprovision of community facility</li> <li>• Reprovision of cultural space</li> <li>• No hotel</li> <li>• Affordable housing at 50% threshold on public sector land or 35% elsewhere</li> </ul> | <p>appropriate to appraise all potential variations<sup>7</sup> of phasing that could come forward as a reasonable alternative. The implications and mitigation of any potential phasing is explored in the appraisal of RAs in the section below this table. This is considered relevant for all RAs.</p> | <ol style="list-style-type: none"> <li>2. Reprovision of community, light industrial and office uses plus residential (option taken forward in SADPD PSV)</li> <li>3. Reprovision of community, light industrial use and provide more workspace than currently exists, plus residential</li> </ol> |
| <p><b>SA18 300-346 Norwood Road SE27</b></p> <p>This site is currently allocated as site 18 of the Local Plan 2021</p> | <p>New commercial (to include flexible workspace) and community uses, replacement light industrial workspace, plus additional residential taken forward in PSV.</p> | <p>80 residential units*</p> <p>Retail floorspace 4152sqm GIA</p> <p>Office floorspace 57sqm GIA</p>   | <p><u>Designations</u><br/>West Norwood District Centre</p> <p>Norwood Road frontage in West Norwood Primary Shopping Area</p> <p>Not in KIBA (therefore non-</p>  | <p><u>London Plan</u><br/>H1<br/>H4-H6<br/>H11<br/>H15<br/>D13<br/>E2<br/>E4<br/>E7<br/>SD6-SD7</p> <p><u>Local Plan</u></p>   | <ul style="list-style-type: none"> <li>• No policy protection petrol station</li> <li>• PN7(f)(i) promotes mixed-use development including housing; and new commercial</li> </ul>   | <p>The site is in multiple ownerships and is likely to come forward in phases. It is not considered realistic or appropriate to appraise all potential phasing options that could come forward as a reasonable alternative. Instead, the implications and</p>  | <ol style="list-style-type: none"> <li>1. Retail-led mixed-use development to include housing (current site allocation in Lambeth Plan 2021)</li> <li>2. Reprovide existing quantum of commercial (to include flexible workspace) and community uses</li> </ol>                                    |

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|  |  | <p>Industrial floorspace<br/>2605sqm GIA*</p> <p>Church<br/>440sqm GIA</p> <p>Petrol station<br/>233sqm GIA</p> <p>Pub 318sqm<br/>GIA*</p> <p>Art studio<br/>263sqm GIA</p> <p>Fast food<br/>takeaways and<br/>restaurants<br/>398sqm GIA</p> <p>*please note –<br/>these quanta<br/>differ in PSV<br/>option<br/>(discussed<br/>below)</p> | <p>designated<br/>industrial land)</p> <p><u>London Plan<br/>policies</u><br/>SD6-SD7<br/>E1<br/>E2<br/>E4<br/>E7<br/>E9<br/>S1<br/>H8</p> <p><u>Local Plan policies</u><br/>H3<br/>ED4<br/>ED7 – ED9<br/>ED13<br/>S1 – S2<br/>PN7</p> | <p>H1 – H5<br/>H12<br/>ED1<br/>ED4<br/>ED7 – ED8<br/>ED13<br/>ED14<br/>S1 – S2<br/>PN7</p> | <p>floorspace<br/>must provide<br/>flexible<br/>workspace to<br/>provide<br/>opportunities<br/>for creative<br/>and digital<br/>industries.</p> <ul style="list-style-type: none"> <li>• Frontage must<br/>be in town<br/>centre uses<br/>because in<br/>PSA –<br/>Shopping<br/>safeguarded<br/>and<br/>encouraged;<br/>within PSA, all<br/>ground floor<br/>units in active-<br/>frontage uses<br/>and no fewer<br/>than 50 per<br/>cent of ground<br/>floor units are<br/>to be in shop<br/>use. For centre<br/>as a whole, no<br/>more than 15<br/>per cent and<br/>no more than 2<br/>in 5<br/>consecutive<br/>hot food<br/>takeaway<br/>uses. No more<br/>betting shops<br/>in the town<br/>centre.</li> </ul> | <p>potential mitigation for<br/>phasing is explored in<br/>the appraisal of RAs in<br/>the section below this<br/>table, and is considered<br/>relevant for all RAs.</p> <p>*Following Reg 18<br/>consultation the site<br/>allocation boundary has<br/>been reduced to<br/>exclude existing the<br/>majority of existing<br/>residential, existing<br/>supermarket, and the<br/>Brooks Laundry<br/>development. The new<br/>amended option taken<br/>forward in PSV is<br/>appraised against the<br/>Reg 18 version below.</p> | <p>plus additional<br/>residential (Option<br/>taken forward in Reg<br/>18 draft SADPD)</p> <p>3. Reprovide existing<br/>quantum of<br/>commercial (to include<br/>flexible workspace)<br/>and community uses<br/>with less residential<br/>and additional flexible<br/>town centre uses</p> |
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|                                |   |  |  |  | <ul style="list-style-type: none"> <li>• No net loss of light industrial</li> <li>• Hotel supported in principle</li> <li>• Office supported in principle</li> <li>• Reprovision of community space</li> <li>• Affordable housing – 35% threshold on private sector land 50% on public land</li> </ul> |   |  |
| <b>SA19 Knolly's Yard SW16</b> | Industrial intensification with residential in Reg 18 draft SADPD. Site not included in SADPD PSV | Industrial floorspace 884sqm GIA plus approx. 9000sqm of associated yard space | <p><u>Designations</u> KIBA with potential for industrial intensification and co-location.</p> <p>Not in town centre</p> <p>SINC 10 surrounds and falls partly within the site</p> <p><u>London Plan policies</u><br/>E2 E4 E7</p> <p><u>Local Plan policies</u><br/>ED3 EN1</p> | <p><u>London Plan</u><br/>H1<br/>H4-H6<br/>D13<br/>E2<br/>E4<br/>E7</p> <p><u>Local Plan</u><br/>H1<br/>H2<br/>H4 – H5<br/>H12<br/>ED3<br/>PN7</p> | <p>Intensification of industrial capacity</p> <p>Potential for residential</p> <p>50% AH threshold because site is in public ownership</p> <p>No main town centres uses (no office, no hotel, no retail or food and drink uses)</p>  | <p>Requirement to provide improved vehicular and pedestrian access to the site – exceptional costs</p> <p>Drawing on officers' analysis of the consultation representations received, and having undertaken further engagement with the local community, in February 2023 the Deputy Leader asked for Knolly's Yard (Site 19) to be removed from the proposed SADPD. This was in response to community concerns including about the</p> | <p>1. Industrial intensification only with no residential</p> <p>2. Industrial intensification with residential</p> <p>3. Site allocation not taken forward – do nothing approach (Option taken forward in Reg 18 SADPD)</p> |

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|                                     |  |  |  |  |   | scale of development proposed. The site has been removed from the SADPD PSV.  |  |
| <b>SA20 Tesco, 13 Acre Lane SW2</b> | Replacement supermarket with residential above   | Supermarket (approx. 2500sqm net sales area) and carpark (229 spaces)  | <u>Designations</u><br>Major Town Centre Boundary – Brixton (Not in Primary Shopping Area and not in new Evening Economy Management Zone)<br><br>Brixton Creative Enterprise Zone<br><br><u>London Plan policies</u><br>SD6- SD7<br>E9<br><br><u>Local Plan policies</u><br>ED7<br>PN3 | <u>London Plan</u><br>H1<br>H4-H6<br>H11<br>H15 – H16<br>SD6 – SD7<br>E1 – E4<br>E9<br><br><u>Local Plan</u><br>H1<br>H2<br>H4-H5<br>H7<br>H12<br>H13<br>ED7<br>ED1<br>ED2<br>ED4<br>ED14<br>PN3 | <ul style="list-style-type: none"> <li>Hotel permissible</li> <li>Main town centre uses within Class E</li> <li>Affordable housing 35% threshold</li> <li>Affordable workspace 10% at either 65% or 50% reduction depending on sqm NIA</li> </ul> | Land is leased by Tesco and reprovision of supermarket is known to be lessee's priority   | <ol style="list-style-type: none"> <li>Reprovide supermarket with no other uses</li> <li>Reprovide supermarket plus residential (option taken forward in SADPD PSV)</li> <li>Reprovide supermarket plus other town centre uses</li> </ol>                                      |
| <b>SA21 51-65 Effra Road SW2</b>    | New light industrial workspace appropriate to Brixton Creative Enterprise Zone and new self-contained residential units was the PSV. | Brixton Unitary Church – approx. 400sqm GIA community floorspace (not included in boundary for RA3)<br><br>Mosaic Centre – approx. 700sqm GIA community floorspace | <u>Designations</u><br>Brixton CEZ<br><br>Not within town centre<br><br><u>London Plan policies</u><br>S1-S2<br>H8<br>H12 – H13<br>E9<br><br><u>Local Plan policies</u><br>H3<br>H8  | <u>London Plan</u><br>H1<br>H4-H6<br>H11<br>H15-H16<br>S1 – S2<br>D13<br>E2<br>E3<br>E4<br><br><u>Local Plan</u><br>H1-H5<br>H7<br>H8  | <ul style="list-style-type: none"> <li>No hotel</li> <li>No offices</li> <li>No shops, food or drink uses</li> <li>Reprovision of community facility floorspace</li> <li>Equivalent quantum of residential floorspace reprovided</li> </ul>       | The site is in multiple ownership and could be developed comprehensively or in phases. It is not considered realistic or appropriate to appraise every possible variation of phasing that could come forward as a reasonable alternative. The implications and mitigation of any potential phasing is explored in the appraisal of RAs in the | <ol style="list-style-type: none"> <li>Replacement space for existing community uses, new light industrial workspace plus residential (Option taken forward in Reg 18 draft SADPD)</li> <li>Replacement space for existing community uses and new residential units</li> </ol> |

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|  |  | <p>(not included in boundary for RA3)</p> <p>Effra Road retail Park – 3456sqm GIA retail floorspace</p> <p>Fitch Court – 35 self-contained residential units (re-provided as part of Somerleyton Road development (not included in boundary for RA3)</p> <p>63 Effra Road – 2 self-contained residential units (not included in boundary for RA3)</p> <p>Massey Mews – private road providing access to separate housing development rear of church.</p> | S1 | H12<br>H13<br>S1<br>S2<br>ED4<br>PN3 | <ul style="list-style-type: none"> <li>Affordable housing at 50% threshold for land in public ownership; 35% in private ownership</li> </ul> | <p>section below this table. This is considered relevant for all RAs.</p> <p>*Following Reg 18 consultation the site allocation boundary has been reduced to exclude existing community uses and residential accommodation. The new amended option taken forward in PSV is appraised against the Reg 18 version in the following section.</p> |  |
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|   |   | (not included in boundary for RA3)  |  |  |   |  |   |
| <b>SA22 1&amp;3 Wellfit Street, 7-9 Hinton Road &amp; Units 1-4 Hardess Street SE24</b> | Workspace to reprovide industrial floorspace capacity, and residential  | Light industrial floorspace – 960sqm GIA<br><br>Retail floorspace – 32sqm GIA | <u>Designations</u><br>Site is a non-designated industrial site.<br><br>Creative Enterprise Zone (outside Brixton town centre bdy)<br><br>Site not within Loughborough Junction local centre<br><br><u>London Plan policies</u><br>E2<br>E4<br>E7<br><br><u>Local Plan policies</u><br>ED4 | <u>London Plan</u><br>H1<br>H4-H6<br>H11<br>H15-H16<br>D13<br>E2<br>E4<br>E7<br><br><u>Local Plan</u><br>H1<br>H2<br>H4-H5<br>H7<br>H12<br>H13<br>ED4<br>ED7<br>PN10 | <ul style="list-style-type: none"> <li>• No net loss of industrial and intensification of industrial capacity (ie 1400sqm required at 65% plot ratio)</li> <li>• Potential for residential</li> <li>• 50% AH threshold if loss of industrial capacity</li> <li>• No hotel</li> <li>• No shops, food and drink or office uses</li> <li>• Include workspace for creative industries given CEZ location</li> </ul> |  | <ol style="list-style-type: none"> <li>1. Workspace to reprovide industrial capacity</li> <li>2. Workspace to reprovide industrial capacity and residential (option taken forward in SADPD PSV)</li> <li>3. Workspace to provide greater industrial capacity and residential</li> </ol> |
| <b>SA23 Coldharbour Lane/Herne Hill Road SE24</b>                                       | Active frontage at ground floor, comprising community uses (replacement place of worship) or town centre use, workspace outside of the local centre boundary, and | Community use – place of worship 1058sqm GIA                                  | <u>Designations</u><br>Most of site within Loughborough Junction Local Centre (except railway arches /south part of site leading to Hardess/Well Fit streets)  | <u>London Plan</u><br>H1<br>H4-H6<br>H11<br>H15-H16<br>D13<br>E2-E4<br>SD6-SD7<br><br><u>Local Plan</u><br>H1  | <ul style="list-style-type: none"> <li>• Main town centre uses within Class E</li> <li>• Active frontage uses at ground floor</li> <li>• Reprovide community use</li> <li>• Hotel would be supported</li> </ul>   |  | <ol style="list-style-type: none"> <li>1. Active frontage ground floor with replacement community uses or town centre uses, plus residential on upper floors within local centre boundary, plus creative workspace outside of the local centre boundary and</li> </ol>                  |



|   |   |  |   |  |  |  |  |
|---|---|--|---|--|--|--|--|
|   | residential on upper floors   |  | <p>Creative Enterprise Zone (outside Brixton town centre bdy)</p> <p><u>London Plan policies</u><br/>S1</p> <p><u>Local Plan policies</u><br/>S1<br/>PN10</p>   | <p>H2<br/>H4-H5<br/>H7<br/>H12<br/>H13<br/>ED11<br/>ED4<br/>ED7<br/>S1 – S2<br/>PN10<br/>PN3€</p>  | <ul style="list-style-type: none"> <li>• Affordable housing 35%</li> <li>• If office proposed as part of active frontage Class E – affordable workspace of 10% required</li> </ul>               |  | <p>residential (option taken forward in SADPD PSV)</p> <p>2. Active frontage ground floor with replacement community uses or other town centre uses within local centre boundary, plus creative workspace outside the local centre boundary.</p>   |
| <b>SA24 Kings College Hospital Estate, Denmark Hill SE5</b> | <p>Hospital and ancillary uses, medical services.</p> <p>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</p> | <p>Hospital and associated ancillary uses</p> <p>King's Business Park (129-131 Coldharbour Lane) – business units used by the hospital for administration and storage</p> <p>Safeguarded waste site used for transfer of clinical waste.</p> | <p><u>Designations</u><br/>King's Business Park within the Coldharbour Lane Estate and Bengeworth Road Depot Key Industrial Business Area (KIBA)</p> <p><u>London Plan policies</u><br/>S1<br/>S2<br/>E2<br/>E4<br/>E7<br/>SI9</p> <p><u>Local Plan policies</u><br/>ED3<br/>S1<br/>EN7</p> | <p><u>London Plan policies</u><br/>S1<br/>S2<br/>E2<br/>E4<br/>E7<br/>SI9</p> <p><u>Local Plan policies</u><br/>D3<br/>S1 - S2<br/>EN7</p> | <ul style="list-style-type: none"> <li>• Reprovide community use</li> <li>• No loss of industrial floorspace capacity within the KIBA</li> <li>• No loss of waste management capacity</li> </ul> | <p>Hospital trust are concerned that the KIBA designation constrains their potential to optimise clinical capacity across their land holding</p> | <p>1. Optimise capacity for clinical uses across the site, including in the KIBA (with no loss of waste management capacity) (option taken forward in SADPD PSV)</p> <p>2. Optimise capacity for clinical uses across the site but with industrial uses only within the KIBA (with no loss of waste management capacity)</p> |

## **Appraising reasonable alternatives**

- 4.13 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.
- 4.14 An appraisal of the reasonable alternatives for all of the proposed sites has been undertaken and is set out below. A short summary of how the proposed site allocations perform against key objectives, focusing primarily on how differences land uses and combinations of land uses perform against the SustA objectives. This is accompanied by a table scoring the RA for each site against the SustA objectives.

**Table 8: Symbols used in the appraisal**

| <b>Symbol</b> | <b>Meaning</b>   |
|---------------|--|
| ++            | 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   |

- 4.15 The SustA process has been undertaken iteratively, informing the drafting of each site allocation as it progresses toward examination. Various amendments (as set out in Table 8 below) were made in the SADPD PSV in response to representations, discussions with statutory consultees, and further evidence gathering. As a result of this, the reasonable alternatives have been revisited following Reg 18 consultation, to test the current site allocation as set out in the SADPD PSV against alternatives to ensure the proposed option represents best meets the objectives for each site.
- 4.16 For reference, a summary of the key changes made to each site following Reg 18 consultation is set out in Table 9 below.

**Table 9: Key changes made to sites following Reg 18 consultation**

| Site No. | Site Address   | Proposed Changes   |
|----------|--|--|
| Site 1   | Royal Street, SE1  | <ul style="list-style-type: none"> <li>The site area has been corrected from 7.2ha to 2.32ha.</li> <li>Building heights and locations amended to address Historic England concerns regarding impact on World Heritage Site.</li> <li>No significant change to other development principles.</li> </ul>   |
| Site 2   | St Thomas' Hospital, SE1   | <ul style="list-style-type: none"> <li>Site extended west to better facilitate development within the hospital estate.</li> <li>Building heights and locations amended to address impact on World Heritage Site.</li> <li>Policy wording updated to require development to be set back from the roadside to address stakeholders concerns re cumulative impact of development.</li> <li>No significant change to other development principles.</li> </ul>  |
| Site 3   | 35 – 37 and Car Park Leigham Court Road, SW16                    | <ul style="list-style-type: none"> <li>Reduction in the number of residential units to be delivered. Decreased from 30-35 units to 25-30 units.</li> <li>No significant change to other development principles.</li> </ul>   |
| Site 7   | 6 – 12 Kennington Lane and Wooden Spon House, 5 Dugard Way, SE11 | <ul style="list-style-type: none"> <li>Minor change to site boundary to reflect land registry ownership details.</li> <li>Reduction in the number of residential units proposed. Decreased from 135-145 units to 115 – 125 units.</li> <li>No significant change to other development principles.</li> </ul>   |
| Site 8   | 110 Stamford Street, SE1   | <ul style="list-style-type: none"> <li>Reduction in the number of residential units proposed. Decreased from 30-40 units to 30 units.</li> <li>No significant change to other development principles.</li> </ul>   |
| Site 9   | Gabriel's Wharf and Princes Wharf                                | <ul style="list-style-type: none"> <li>Policy worded updated to allow for an element of extra care housing where need is demonstrated.</li> <li>No significant change to development principles.</li> </ul>  |
| Site 17  | 330 – 336 Brixton Road, SW9                                      | <ul style="list-style-type: none"> <li>Reduction in the number of residential units proposed. Decreased from 70-75 units to 60-70 units.</li> <li>No significant change to other development principles.</li> </ul>  |
| Site 18  | 300 – 346 Norwood Road   | <ul style="list-style-type: none"> <li>Significant local opposition to principle and scale of development.</li> <li>Site boundary amended to reduce scale of allocation to exclude existing housing at north east corner and south west corner, also 'laundry' site which is already under construction.</li> <li>Reduction in the number of residential units proposed. Decreased from 390-470 units to 150-170 units.</li> <li>Quantum of commercial/community floorspace including light industrial workspace, reduced from 5,000-7,000 sqm to 3,000 – 4,000 sqm to include at least 1,123 sqm GIA light industrial workspace (to achieve no net loss of existing industrial floorspace capacity).</li> <li>Additional wording proposed to clarify that a tall building will only be considered appropriate on the site if certain conditions are met e.g. public benefits are achieved.</li> <li>No significant change to other development principles.</li> </ul> |
| Site 19  | Knolly's Yard, SW16  | <ul style="list-style-type: none"> <li>Significant local opposition to principle and scale of development.</li> <li>Deputy Leader confirmed site to be removed.</li> <li>Site no longer proposed for allocation.</li> </ul>  |

|         |  |  |
|---------|--|--|
| Site 20 | Tesco, 13 Acre Lane, SW2   | <ul style="list-style-type: none"> <li>• Minor amendment to site boundary.</li> <li>• Proposed quantum of residential development increased from 120 -170 units to 180 -210 units.</li> <li>• No significant change to other development principles.</li> </ul>  |
| Site 21 | 51-57 Effra Road, SW2  | <ul style="list-style-type: none"> <li>• Site boundary amended to remove Fitch Court, Brixton Unitary Church and Mosaic Centre therefore no replacement community use required.</li> <li>• Reduction in the number of residential units proposed. Decreased from 200-240 units to 85-95 units.</li> <li>• No significant change to other development principles.</li> </ul>  |
| Site 22 | 1 & 3–11 Wellfit Street, 7–9 Hinton Road & Units 1–4 Hardess Street SE24 | <ul style="list-style-type: none"> <li>• Indicative servicing location amended to be within the site on the servicing route (rather than on Hardess Street).</li> <li>• Proposed pedestrian link with Higgs through railway arch removed.</li> <li>• Reduction in the number of residential units proposed. Decreased from 70-90 units to 50-70 units.</li> <li>• Policy wording added related to the development implications for trees.</li> <li>• No significant change to other development principles.</li> </ul> |
| Site 23 | Land at corner of Coldharbour Lane and Herne Hill Road, SE24             | <ul style="list-style-type: none"> <li>• Indicative locations of National Grid assets included on context map.</li> <li>• Indicative light industrial area and the extent of 'sensitive residential neighbour' to be extended on the vision map</li> <li>• Reduction in the number of residential units proposed. Decreased from 30-40 units to 25-30 units.</li> <li>• Factual updates to policy text.</li> <li>• No significant change to other development principles.</li> </ul>                                   |
| Site 24 | King's College Hospital, Denmark Hill, SE5                               | <ul style="list-style-type: none"> <li>• Factual updates to policy text.</li> <li>• Clarification regarding the safeguarded waste site within the site added.</li> <li>• No significant change to other development principles.</li> </ul>   |

4.17 Guidance on the SustA process advises that modifications to the sustainability appraisal should be considered by the Local Planning Authority only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects.

4.18 Having considered the changes summarised in the table above, the amendments made to Site 18 and Site 21 would result in a reduced site boundary. It is likely that a lower quantum of development would forward on each site, while the composition and mix of uses may also differ.

4.19 To take account of this, the PSV is considered against the preferred option that was taken forward in the Reg 18 version of the SADPD for Site 18 and Site 21. The

main changes between the sites are set out in Table 10 below and are considered in more detail later.

**Table 10: Comparison between Reg 18 SADPD draft and SADPD PSV of Sites 18 and 21**

| Site No. | Preferred RA taken forward in Reg 18 SADPD  | Amended option taken forward in Reg 19 SADPD PSV   | Key changes between Reg 18 and Reg 19 version of the SADPD   |
|----------|---|--|--|
| 18.      | Reprovide existing quantum of commercial (to include flexible workspace) and community uses plus additional residential | Provide commercial (to include flexible workspace) and community uses, replacement light industrial workspace, plus additional residential | <p>SA to exclude residential to the north of the site, existing supermarket to the south of site, and laundry site to the south-west which is currently under construction. The reduced site would include 1,123 sqm of existing industrial floorspace and 9 existing residential units</p> <p>Reduced quanta of residential and commercial floorspace expected</p> <p>The site allocation requires existing quantum of light industrial floorspace to be reprovided</p> |
| 21.      | Replacement space for community uses, new light industrial workspace, new residential units                             | New light industrial uses and new residential  | <p>SA to exclude existing residential to the south and community uses to the north</p> <p>SA will no longer need to re-provide these existing uses as a result</p>   |

## **SA1: Royal Street, SE1**

**Reasonable Alternative 1:** Replacement affordable housing; health use for the expansion of St Thomas' Hospital to provide clinical and ancillary hospital uses (current site allocation in Lambeth Plan 2021)

**Reasonable Alternative 2:** Replacement residential and office, with additional office to support MedTech Hub plus flexible ground floor E Class uses

**Reasonable Alternatives 3:** Replacement residential and office, with additional residential, plus flexible ground floor E Class uses

**Reasonable Alternative 4:** Replacement residential and office, to support MedTech Hub, plus flexible ground floor E Class uses, alongside cultural and community uses (option taken forward in SADPD PSV)

| <b>Sustainability Appraisal (SustA) Objective</b>   | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> | <b>Score RA4</b> |
|---|------------------|------------------|------------------|------------------|
| 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.  | 0/+ | 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/+ | 0/+ |
| 15. To improve air quality and limit exposure to poor air quality.   | 0/+ | 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. | +   | ++  | ++  | ++  |
| 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 and new health / clinical uses 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 all RAs score well on this. Both clinical and office floorspace will 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, all RAs score positively in this regard. RA1 and RA3 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.

All RAs offer residential, although RA3 seeks to deliver more residential than the existing quantum on-site, and therefore would score more positively against SustA objective 6. However, all RAs will be expected to deliver at least 35% affordable housing.

RA2 – RA4 include 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. RA4 would include new community and cultural uses on the site, supporting the evolution of the South Bank and Waterloo Creative Cluster, and providing new social infrastructure for new and existing residents, as well as visitors to the area therefore scoring more positively against SustA objectives 2, 3, 4 and 7.

RA1 and RA3 will result in a less diverse range of uses coming forward. and not optimise the opportunities of this site for local residents, given area designations (CAZ, OA, SB&WNA), and the wider objectives of the SADPD. Conversely RA2 and RA4 would promote a greater mix and quantum of employment generating activities supporting objectives 5, 17 and 18.

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 RA3 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). All alternatives score positively with regards to SustA objective 9.

On balance, RA4 is considered the best option of the three, on the basis that this would maximise the benefits to the local residents and the wider population through the provision of community and cultural uses, in addition to replacement housing, while providing replacement office space, alongside new specialist office space to support the MedTech cluster,

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.**

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score RA1</b> |
|---|------------------|
| 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.   | 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/+              |
| 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.              | +/?              |



|  |               |
|--|---------------|
| <p><b>18.</b> 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>+ / ++</p> |
|--|---------------|

**Summary appraisal of Reasonable Alternative (RA)**

Proposed use for this site is delivery of enhanced clinical care facilities and reprovision 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 land uses 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 well-being for people of the local area, Lambeth borough, London and nationally.

The proposed land uses 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 land use (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

**Reasonable Alternative (RA) 3:** Ground floor commercial floorspace within town centre boundary, flexibility for residential or commercial Use Class E above, residential to rear of site (option taken forward in SADPD PSV)

| <b>Sustainability Appraisal (SustA) objective</b>  | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> |
|--|------------------|------------------|------------------|
| <b>1.</b> Crime and safety. Ensuring safe communities with reduced crime and disorder.   | +                | ++               | + / ++           |
| <b>2.</b> Promote a healthy community, including reducing health inequalities and the causes of ill health.  | ++               | ++               | ++               |
| <b>3.</b> 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.  | ++               | ++               | ++               |
| <b>4.</b> To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.   | + / ?            | + / ?            | + / ?            |
| <b>5.</b> To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.  | ++               | ++               | ++               |
| <b>6.</b> Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.   | ++               | ++               | ++               |
| <b>7.</b> 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.                                 | ++               | ++               | ++               |
| <b>8.</b> 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.   | ++               | ++               | ++               |
| <b>9.</b> 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.   | ++               | ++               | ++               |
| <b>10.</b> To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.  | +                | +                | +                |
| <b>11.</b> To create, manage and enhance green infrastructure.   | +                | +                | +                |
| <b>12.</b> 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. | + / ++           | + / ++           | + / ++           |
| <b>13.</b> 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/   | +    |
| 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. Residential uses on upper floors of town centre boundary may provide better passive surveillance in evenings and weekends so would score more positively on SA objective 1.

One of the biggest influences of people's health is employment, so enabling town centre uses at this site for all alternatives (and also above ground floor level under RA1), would likely lead to positive effects with regards to health. It is noted the location provides future residents easy access to other employment within Streatham and also with excellent public transport connection to other areas.

Providing all residential to the rear of the site could help limit exposure of residential units to poor air quality, therefore RA1 and potentially RA3 would score higher.

All RAs offer residential, and all RAs will result in provision of affordable housing which will help address unmet need in Lambeth. Accordingly, all alternatives proposed 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 1,2 and 3 involve residential development and therefore this, together with town centre uses at ground floor (and above (RA1 and potentially RA3)) 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 and will contribute towards modal shift in people using public transport to access the town centre.

On balance, RA1 and RA2 score similarly across the objectives. RA3 provides greater flexibility for the upper floors within the town centre boundary so is considered the best option out of the three RA proposed, allowing the details to be considered at the planning application stage.

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 uses and a greater amount of residential (option taken forward in SADPD PSV)

**Reasonable Alternative (RA) 2:** Workspace to provide greater industrial capacity with replacement community uses and less residential than RA1

| <b>Sustainability Appraisal (SustA) objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> |
|---|------------------|------------------|
| 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.   | 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 / +            |
| 15. To improve air quality and limit exposure to poor air quality.  | 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. | ++     | ++ |
| 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 include provision of community, light industrial and residential so it is likely there will be activity during the day related to all proposed land uses and activity at night associated with residential use, which will help with passive surveillance and improved feelings of safety and security. Both RAs provide new employment space so will create new economic opportunities; 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.

Both RAs offer residential and will result in provision of affordable housing which will help address unmet need in Lambeth. RA1 would likely enable a greater quantum of housing to be delivered, on the basis that RA2 would prioritise additional light industrial uses. Accordingly, RA1 results in a higher scoring for SustA objective 6. (Reprovision of Wooden Spoon House on site may result in fewer residential units.)

Both RAs seek to reprovide community floorspace and therefore score well against the social sustainability appraisal objectives. Both options enable the community use associated with Wooden Spoon House to be reprovided on site or off-site, in accordance with Local Plan Policy S1. Reprovision of the community use 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, there is a chance this could lead to reduced access to local residents, as well as potentially longer journeys, equally the opposite may be true if this were to be moved to a more accessible location. The merits of either option would be assessed at the application stage.

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 land uses 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.

The site is in multiple ownerships, therefore all RAs could result in the site being redeveloped comprehensively or development coming forward in phases. While either route could result in minor differentiations to the final scheme, we do not consider this will lead to significant adverse impacts. If development is brought incrementally, applicants will need to demonstrate that the partial development of the site does not prejudice the optimum future development of adjoining plots. Officers may use planning conditions or legal agreements to ensure the vision for the site is achieved.

Both options score similarly across the objectives when taken in the round. Overall, RA1 is considered the most appropriate as this would likely enable the delivery of more new housing and affordable housing on site, while still retaining existing light industrial capacity.

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

## **SA8: Stamford Street, SE1**

**Reasonable Alternative 1:** Provide residential with office use at ground floor

**Reasonable Alternative 2:** Provide residential with community use at ground floor

**Reasonable Alternative 3:** Provide residential above and office and/or community use at ground-floor (option taken forward in SADPD PSV)

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> |
|---|------------------|------------------|------------------|
| 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.   | 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. | ++ | ++ | ++ |
| 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 office at the site enables increased likelihood of activity during weekdays which will help with passive surveillance and improved feelings of safety and security. Passive surveillance and level and frequency of activity will depend on the type of community use proposed. 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 employment uses 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 and RA3 may result in provision of affordable workspace, whereas RA2 will not. RA1 and RA3 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 RA2 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.

Community uses 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). RA1, RA2 and RA3 would all contribute positively in different ways to SustA objectives 2, 5, 7.

All three RAs offer residential and all will result in provision of affordable housing which will help address unmet need in Lambeth. Accordingly, all 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 1,2 and 3 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.

Given the range of benefits associated with both office and community uses, RA3 achieves positive scoring across a greater range of SustA objectives than RA 1 and RA2, therefore this option has been taken forward.

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

**Reasonable Alternative 3:** Residential (which may include an element of extra-care C3 housing) plus offices and/or workspace and replacement cultural, retail and food and drink floorspace (option taken forward in SADPD PSV)

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> |
|---|------------------|------------------|------------------|
| 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.   | 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.   | +   | +   | +   |
| 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 active ground floor uses (eg retail, food and drink) under all 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.

All 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 or RA3. All RAs will result in provision of affordable housing, but it is possible that RA1 may result in more affordable housing than RA2 and RA3. RA3 would allow for an element of extra care housing, this would score more positively than the other options on SustA objectives 3, 5 and 6.

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 and RA3 will result in provision of new office space and also 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 and RA3 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 all RAs at this site have potential to deliver significant benefits on the health objective.

All options involve re-provision 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. All options would provide 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.

On balance, RA3 provides a mix of uses that best aligns with the opportunities for this site, achieving significant positives effects across a greater range of SustA objectives.

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 (option taken forward in SADPD PSV)

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

| <b>Sustainability Appraisal (SustA) Objective</b>   | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> |
|---|------------------|------------------|------------------|
| 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.   | 0/+              | 0/+              | 0/+              |

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|--|-------|--------|-----|
| 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.   | +     | +      | +   |
| 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 land 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 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 RA2 and RA3 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 2, 8, 12 and 15, 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 land uses 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, 16 and 18.

The site is in multiple ownerships, therefore all RAs could result in the site being redeveloped comprehensively or development coming forward in phases. While either route could result in minor differentiations to the final scheme, we do not consider this will lead to any significant adverse impacts. If development is brought incrementally, applicants will need to demonstrate that the partial development of the site does not prejudice the optimum future development of adjoining plots. Officers may use planning conditions or legal agreements to ensure the vision for the site is achieved.

As the site is not within a town centre and is constrained by existing residential on three sides, RA2 will be taken forward. This provides a more realistic opportunity for optimising the delivery of new housing and affordable housing, while still re-providing a significant amount of existing floorspace associated with office and light industrial uses in light of site constraints.

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

## **SA18: 286-362 Norwood Road, SE27**

### **Initial testing of options**

**Reasonable Alternative 1:** Retail-led mixed-use development to include housing (current site allocation in Lambeth Plan 2021)

**Reasonable Alternative 2:** Reprovide existing quantum of commercial (to include flexible workspace) and community uses plus additional residential (Option taken forward in Reg 18 draft SADPD)

**Reasonable Alternative 3:** Reprovide existing quantum of commercial (to include flexible workspace) and community uses with less residential and additional flexible town centre uses

| <b>Sustainably Appraisal (SustA) objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> |
|--|------------------|------------------|------------------|
| <b>1.</b> Crime and safety. Ensuring safe communities with reduced crime and disorder.   | ++               | ++               | ++               |
| <b>2.</b> Promote a healthy community, including reducing health inequalities and the causes of ill health.  | +                | ++               | ++               |
| <b>3.</b> 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.  | +                | ++               | ++               |
| <b>4.</b> To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.   | +/?              | +/?              | +/?              |
| <b>5.</b> To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.  | +                | +/?              | +/?              |
| <b>6.</b> Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.   | +/?              | ++               | +/?              |
| <b>7.</b> 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.                                 | +/?              | ++               | ++               |
| <b>8.</b> 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.   | +/?              | +/?              | +/?              |
| <b>9.</b> 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.   | ++               | ++               | ++               |
| <b>10.</b> To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.  | +                | +                | +                |
| <b>11.</b> To create, manage and enhance green infrastructure.   | +                | +                | +                |
| <b>12.</b> 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. | +/?              | +/?              | +/?              |
| <b>13.</b> 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.   | +   | +      | +   |
| 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, 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. Therefore all options score positively for SustA objectives 1 and 7.

Overall, RA1 and RA2 score less positively than R3 on the SustA objectives 7, 16 and 18 because they only seek to reprovide existing quantum of commercial and community space. Further, RA1s focus on retail may result in less diversity in town centre functions, while not specifically promoting flexible workspace it may not manage to meet the evolving needs of businesses in the locality and wider area.

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 and RA3 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 and RA3 score more positively than RA1 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.

All RAs offer residential, and all RAs will result in provision of affordable housing which will help address unmet need in Lambeth. RA2 will result in delivering more housing than RA1 and RA3 and therefore this scored more positively on SustA objective 6 and RAs 1 and 3. It is recognised that households contribute to the local economy and therefore RA2 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 (e.g. West Norwood Key Industrial Business Area (KIBA)) and healthcare. All involve residential development and therefore this, together with the mix 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.

The site is in multiple ownerships, given the scale of the site, it is likely that all RAs would result in development coming forward in phases. While this will lead to differences in the overall composition and design of the scheme, we do not consider this will lead to any significant adverse impacts. If development is brought incrementally, applicants will need to demonstrate that the partial development of the site does not prejudice the optimum future development of adjoining plots. Officers may use planning conditions or legal agreements to ensure the vision for the site is achieved.

When considered against the objectives as a whole, RA2 was considered to be the most suitable option and was taken forward in the Reg 18 draft SADPD, given it would lead to a significant uplift in new housing and affordable housing at the site, while contributing to the local economy and vitality of the town centre through the provision of new high quality commercial and community uses.

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

## **Testing Reg 18 draft allocation against Reg 19 PSV allocation**

As discussed at 4.17 – 4.19 above, the SA boundary for Site 18 was reduced following feedback received at Reg 18 consultation. As a result, certain existing uses have been removed from the allocation. As a result of these changes, the amended site allocation proposed in the SADPD PSV has been compared against the earlier draft allocation policy taken forward at Reg 18.

**Reasonable Alternative 1:** Reprovide existing quantum of commercial (to include flexible workspace) and community uses plus additional residential (Option taken forward in Reg 18 draft SADPD)

**Reasonable Alternative 2:** Provide commercial (to include flexible workspace) and community uses, replacement light industrial workspace, plus additional residential (option taken forward in Reg 19 SADPD PSV)

| <b>Sustainably Appraisal (SustA) objectives</b>   | <b>Score RA1</b> | <b>Score RA2</b> |
|---|------------------|------------------|
| 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.   | 0/+              | 0/+              |

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| 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/+ |
| 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)

The boundary of the proposed site allocation has been reduced following comments made at Reg 18 consultation. This has removed various uses, including the residential to the north of the site, existing supermarket to the south of site, and laundry site to the south west which is currently under construction.

Both options promote mixed use development that would be appropriate for the town centre. These would contribute to increased activity levels and would have positive effects on feelings of safety through encouraging opportunities for passive surveillance. Therefore both score positively for SustA objectives 1 and 7.

Both RA1 and RA2 would provide new housing and new affordable housing. A reduced site boundary would likely result in a lower quantum of residential development coming forward on site for RA2, therefore RA1 would score marginally better on SustA objectives 6 and 7. In the short to medium term RA2 may provide security and less disruption to existing tenants and residents within housing to be excluded from the allocation, though the benefits of higher quality development such as better energy efficiency may not be realised. (It is noted that new residential development could still come forward on areas outside of the site allocation.)

Both RA1 and RA2 will have positive effects on the economy. Both promote a mix of commercial town centre uses, includible flexible workspace which would 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. RA2 introduces a requirement for the re-provision of existing light industrial floorspace, therefore this would score more positively than RA1 on the economic objectives. This would also support social objectives am such as equalities and health through increasing access to employment.

The removal of the Old Laundry site and the Iceland Supermarket are likely to have negligible impact as new development has only recent come forward so these would unlikely be redeveloped for a long time. RA2 would result in less development in the short to medium to term, therefore this may result in a short to less emissions associated with new building materials and those emitted in the construction process. However, new buildings may be more efficient in the longer term and make a better use of space.

Overall, both options perform will against the SustA objectives. Option 1 could deliver more development and provide more new housing and affordable housing. Option 2 would score less well on these objectives, though would help to retain capacity for light industrial floorspace on the site and may result in more positive impacts on the local economy. Given the pushback from local stakeholders, a political decision has been taken to take forward Option 2 and this is considered to be a more realistic and deliverable option for development to come forward.

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 (Option taken forward in Reg 18 draft SADPD)

**Reasonable Alternative 3:** Site allocation not taken forward – do nothing approach (Option taken forward for SADPD PSV)

| <b>Sustainability Appraisal (SustA) objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> |
|---|------------------|------------------|------------------|
| 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                | +/?              | 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.   | 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.                                 | --               | + / ++           | 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.   | +/?              | +/?              | 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.   | ?                | + / ?            | 0                |
| 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.   | +                | +                | 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                |
| 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                |



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| 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.  | ++     | + / ++ | 0 |
| 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 |
| 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 |

### Summary appraisal of Reasonable Alternatives (RAs)

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 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 land use 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).

RA3 would provide no site-specific policy for this site therefore the scoring remains neutral for all objectives. Development proposals could still come forward on this site without a specific site allocation, though it is likely this would not optimise the benefits of development when compared against RA1 and RA2.

While RA2 scores more highly across the SustA objectives the site is not being taken forward in the SADPD PSV. In February 2023 the Deputy Leader asked for Knolly's Yard (Site 19) to be removed from the proposed SADPD. This was in response to community concerns including about the scale of development proposed. The site allocation has not been carried forward and is not included within the SADPD PSV.

## **SA20: Tesco, Acre Lane, SW2**

**Reasonable Alternative 1:** Reprovide supermarket with no other uses

**Reasonable Alternative 2:** Reprovide supermarket plus residential (option taken forward in SADPD PSV)

**Reasonable Alternative 3:** Reprovide supermarket plus other town centre uses

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> |
|---|------------------|------------------|------------------|
| 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/+              | +/?              | +/?              |
| 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.   | 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/+              |

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| 15. To improve air quality and limit exposure to poor air quality.   | 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. | -- | ++ | +  |
| 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 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.

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.

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.

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.

Given the significant benefits that new housing will provide, RA2 will be taken forward in the SADPD.

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

## **SA21: 51-65 Effra Road, SW2**

### **Initial testing of options**

**Reasonable Alternative (RA) 1:** Replacement space for existing community uses, new light industrial workspace plus residential (Option taken forward in Reg 18 draft SADPD).

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

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> |
|---|------------------|------------------|
| 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.   | 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 / +            |
| 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            |

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| 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 land uses 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 RA1 and RA2 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.

All 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. Both options involve residential development and therefore this, together with other proposed land uses 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.

The site is in multiple ownerships, therefore all RAs could result in the site being redeveloped comprehensively or development coming forward in phases. While either route could result in minor differentiations to the final scheme, we do not consider this will lead to any significant adverse impacts. If development is brought incrementally, applicants will need to demonstrate that the partial development of the site does not prejudice the optimum future development of adjoining plots. Officers may use planning conditions or legal agreements to ensure the vision for the site is achieved.

Overall RA1 was considered to be the most suitable option and was taken forward in the Reg 18 draft SADPD providing new housing and affordable housing, alongside community and employment uses therefore providing opportunities for economic growth while delivering improved social infrastructure. As discussed below this option has been reappraised against an option with a smaller site area.

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

## Testing Reg 18 draft allocation against Reg 19 PSV allocation

As discussed at 4.17 – 4.19 above, the SA boundary for Site 21 was reduced following feedback received at Reg 18 consultation. As a result, certain existing uses have been removed from the allocation. As a result of these changes, the amended site allocation proposed in the SADPD PSV has been compared against the earlier draft allocation policy taken forward at Reg 18.

**Reasonable Alternative (RA) 1:** Replacement space for existing community uses, new light industrial workspace plus residential (option taken forward in Reg 18 draft SADPD)

**Reasonable Alternative (RA) 2:** New light industrial uses and new residential. Site allocation to excludes existing residential to the south and community uses to the north. (option taken forward in SADPD PSV)

| 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.   | 0/+       | 0/+       |

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| 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/+  |
| 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)

The boundary of the proposed site allocation has been reduced following comments made at Reg 18 consultation. This has removed the existing residential to the south of the site and community uses to the north.

Both options promote mixed use development that would be appropriate for this locations designation. These would contribute to increased activity levels and would have positive effects on feelings of safety through encouraging opportunities for passive surveillance. Therefore both score positively for SustA objectives 1 and 7.

Both RA1 and RA2 would provide new housing and new affordable housing. A reduced site boundary would likely result in a lower quantum of residential development coming forward on site for RA2, therefore RA1 would score more highly on SustA objectives 6 and 7. In the short to medium term RA2 may provide security and less disruption to existing tenants and residents within the existing housing to be excluded from the allocation, though the benefits of higher quality development may not realised, such as the benefits of greater energy efficiency. (It is noted that new residential development could still come forward on areas outside of the site allocation.)

Both RA1 and RA2 will have positive effects on the economy. Both promote new light industrial floorspace, including creative flexible workspace suited to the Brixon Creative Enterprise Zone would 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.

In the short to medium term RA2 may provide security and less disruption to existing tenants and users such as those who use the Mosaic Centre as this will be excluded from the allocation, however, the benefits of more suitable/better-quality facilities may not be realised. It is noted that these excluded parts of the site could come be redeveloped without being allocation.

Overall, both options perform will against the SustA objectives. Option 1 could deliver new replacement community uses that are better suited to operators/users. Option 1 would also provide more new housing and affordable housing. Option 2 would score less well on these objectives, though would cause less disruption to existing residents tenants and service users. Given the pushback from local stakeholders, a political decision has been taken to take forward Option 2 and this is considered to be a more realistic and deliverable option for development to come forward.

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 (option taken forward in SADPD PSV)

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

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> | <b>Score RA3</b> |
|---|------------------|------------------|------------------|
| 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.                                 | 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.   | 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/+              |



|  |     |        |     |
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| 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.  | 0   | + / ++ | ++  |
| 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/- | + / ++ | ++  |
| 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   | + / ++ | ++  |

### Summary appraisal of Reasonable Alternatives (RAs)

RAs 2 and 3 include provision of both light industrial land use 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.

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. Additional residential would also support the economic objectives (SustA objective 16 and 18).

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).

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 land uses 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.

RA1 offers a single land use 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).

While RA3 may result in additional workspace and deliver better against economic objectives (16 & 18), this would likely result in less housing and affordable housing being provided compared with RA2. As such, RA2 has been chosen as the best option given the significant benefits of new housing.

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

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

**Reasonable Alternative 1:** Active frontage ground floor with replacement community uses or town centre uses, with residential on upper floors within local centre boundary, plus creative workspace outside of the local centre and residential (option taken forward in SADPD PSV)

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

| <b>Sustainability Appraisal (SutsA) Objective</b>   | <b>Score RA1</b> | <b>Score RA2</b> |
|---|------------------|------------------|
| 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.   | 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 / +            |
| 15. To improve air quality and limit exposure to poor air quality.  | 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. | ++     | + / ++ |
| 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)

RA1 includes provision of replacement community, workspace plus residential so it is likely there will be activity during the day related to all proposed land uses 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 there 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. Reprovision 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. RA1 involves residential development and therefore this, together with other proposed land uses 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 land uses for the site as well as relatively easy access to other employment areas and Loughborough Junction and Brixton town centres, means this option score more positively with regards to SustA Objective 9.

RA1 is considered the best option, given the new housing and affordable will provide significant additional benefits when compared to RA2, while also providing the opportunity for new social infrastructure and employment through replacement community or town centre uses, and new workspace.

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) (option taken forward in SADPD PSV)

**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) (

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score RA1</b> | <b>Score RA2</b> |
|---|------------------|------------------|
| 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.  | 0 / +            | 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.   | 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 / +            |
| 15. To improve air quality and limit exposure to poor air quality.  | 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. | ++ | +/++ |
| 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), however, RA1 has the potential to allow for greater capacity for clinical and associated uses, therefore both would score positively on the economic objectives. It is noted that the waste management facility is associated with hospital so it would be beneficial to protect this to enable the hospital to continue to operate effectively. RA1 may result in this facility being reprovided elsewhere on site.

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 land use (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.

While the scoring is similar across many of the economic objectives for the two options, providing greater flexibility over where land uses are located may enable the hospital to rationalise its layout in a more effective and sustainable way. Therefore, RA1 is considered the most appropriate to take forward.

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**

- 4.20 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 SADPD PSV. 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.
- 4.21 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.
- 4.22 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 SADPD PSV so that the SADPD PSV could benefit from incorporating the SA recommendations.
- 4.23 The assessment of significant effects of the SADPD PSV 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
- 4.24 Table 11 summarises the symbols that have been used in the appraisal of the SADPD PSV to show the significance of likely effects arising for the Plan.

**Table 11: Symbols used in the appraisal**

| <b>Symbol</b> | <b>Meaning</b>   |
|---------------|--|
| ++            | 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   |

4.25 This draft report represents an assessment of the SADPD PSV – (Reg 19) stage of the plan making process. As noted above, where appropriate, recommendations have been made during the process and incorporated into the SADPD PSV. The plan making process enables opportunity for further changes to the SADPD PSV as a result of Regulation 18 consultation. Appraisal of the draft site allocation policies is provided below for the 13 sites.

## **SA1: Royal Street, SE1**

**Proposed Site Allocation:** Development should include no fewer than 129 self-contained residential units, to replace the existing quantum of homes on site. In addition, there is potential to accommodate office floorspace, 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.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/<br/>Likely<br/>effects</b> |
|---|--------------------------------------|
| 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.   | 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 / +                                |
| 15. To improve air quality and limit exposure to poor air quality.  | 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. | ++ |
| 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 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 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 land-uses 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 and community 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 Guy's & St Thomas's Hospital. Moreover, the site will deliver an expansion of Guy's & 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 an 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. At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as "play on the way parallel playable routes". The requirements of Local Plan policies Q1 and Q 6 are also now referenced in the SADPD PSV, this will help secure good urban design outcomes and inclusive environments. Consideration of community safety early in the design process of the development will result in enhancing 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 community safety results in wide ranging benefits for many equality groups for example including 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 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. A minimum of 35% of the units will need to be affordable. To meet fast track requirements 70% must be low-cost social rent and 30% intermediate affordable 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. This may be addressed in part through any CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the SADPD PSV 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 to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies, including S2 on social infrastructure, EN1 on green infrastructure and various policies in the transport section. All relevant Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD PSV, whether or not they are specifically mentioned in the site allocation policy. To further assist, this site allocation policy requires a contribution to the maintenance and management of existing open spaces if development of the site would result in increased usage of existing parks and open spaces. As a result of the 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. (Positive impacts on SustA objectives 2, 3, 4, 7, 8 and 9).

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 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 green or brown roofs. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better quality natural habitat than there was before development. The policy also sets out an exception for development to deliver at least 10% biodiversity net gain. 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 2, 5, 6, 12). This will be particularly beneficial to those on lower incomes occupying the new affordable housing. The mixed-use nature of the development and proximity to Guys & St Thomas' Hospital also means delivery of decentralised heating may be feasible. Major development has potential to aid the delivery of sustainable energy schemes such as energy performance standards, on-site renewable energy generation and climate change mitigation and adaptation measures such as net 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 of the site will reduce risk of flood damage to homes and businesses (positive effects on SustA objective 13). Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has been added to Local Plan Policy EN4(f), in reference to adequate remedial treatment of any contaminated land. 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 high 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. Following Reg 18 consultation, the policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. The visual impact of the scheme has been given further consideration, Lambeth has met with colleagues at LB Westminster and Historic England to discuss any cross-border impacts, with particular attention given to the impact on the Westminster World Heritage Site, Strategic Views, and other heritage assets in the vicinity. The section on Building design, views and townscape has been amended to make clear that stated building heights are maximum. Additional text has been added to say 'A desk-based archaeological assessment and a Heritage Impact Assessment will be required.' This will help achieve positive outcomes for heritage and conservation, responding to HE and GLA'S comments at Reg 18. 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 some 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 opportunities 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 likely begin to emerge from occupation of the site.

The site currently comprises residential, carparking, meanwhile business and cultural spaces, community farm and areas which are 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 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 and also the meanwhile business and cultural spaces at Paradise Yard, which are deemed to be temporary 'meanwhile' uses 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. Further revisions have been made to the indicative model following high-level daylight/sunlight testing of the massing model in accordance with recognised industry standards. This will help to ensure the amenity of neighbouring properties and future residents is protected. 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.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 6.

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 such as 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 in the text and 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.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/<br/>Likely<br/>effects</b> |
|---|--------------------------------------|
| 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.   | 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/+                                  |
| 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 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 the Florence Nightingale Museum. It is considered that the proposed land uses for the site allocation will likely result in significantly positive effects on social objectives, notably health and wellbeing.

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). 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 provides a robust framework to promote an 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. At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play on the way parallel playable routes. The requirements of Local Plan policies Q1 and Q 6 are also now referenced in the SADPD PSV, this will help secure good urban design outcomes and inclusive environments. Consideration of community safety early in the design process of the development will result in enhancing 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 community safety result 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 land use (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 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 SADPD PSV, 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 green or brown roofs. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better quality natural habitat than there was before development. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. Inclusion of 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 could 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 net 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 and also help mitigate risk to local homes and businesses. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has been added to Local Plan Policy EN4(f), in reference to adequate remedial treatment of any contaminated land (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 high standards of sustainability and climate change response, manage impacts of potential effects and it is considered the 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 guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against SustA Objective 8. Following Reg 18, the visual impact of the scheme has been given further consideration, Lambeth has met with colleagues at LB Westminster and Historic England to discuss any cross-border impacts, with particular attention given to the impact on the Westminster World Heritage Site, Strategic Views, and other heritage assets. The section on building design, views and townscape has been amended to make clear that building heights are maximum. Additional text has been added to say "A desk-based archaeological assessment and a Heritage Impact Assessment will be required." This will help achieve positive outcomes for heritage and conservation, responding to HE and GLA'S comments at Reg 18. Positive effects on the achievement of SustA Objective 8 are expected.

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. Further revisions have been made to the indicative model following high-level daylight/sunlight testing of the massing model in accordance with recognised industry standards. This will help to ensure the amenity of surrounding residents is protected. This will help make a positive contribution towards SustA Objectives 6, 7 and 8.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1.

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 opportunities 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 (e.g. SustA Objectives 16-18) are likely in the short-medium term with regard 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 in the text and 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 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 such as 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 comprising ground floor commercial floorspace within town centre boundary, flexibility for residential or commercial Use Class E above, Residential to rear of site.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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 / +                        |
| 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 commercial floorspace within Class E within the town centre boundary with option for new residential on upper floors within town centre boundary and residential to the rear of the site. 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 (positive impacts on SustA objectives objective 5, 6, and 7).

Provision of a commercial use within Class E will provide new high quality, accessible space for small businesses, employment and business opportunity for local people and contribute to the local economy. It will contribute to the sense of place and provide an active frontage within the town centre, thereby contributing positive effects on SustA objectives 7, 16 and 18.

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, and public transport (bus and train) providing access to other employment areas and other healthcare facilities. The redevelopment of this site would provide a more efficient use of land in this location. 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 footway and public realm to Leigham Court Road. At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play on the way parallel playable routes. The requirements of Local Plan policies Q1 and Q 6 are also now referenced in the SADPD PSV, this will help secure good urban design outcomes and inclusive environments. Consideration of community safety early in the design process of the development will result in enhanced 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 of community safety will result 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. New housing and affordable housing will help to reduce overcrowding and meet unmet need. New housing proposed under the SADPD PSV will help 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. This may be supported in part through any CIL contributions secured from new development. There is also scope in certain circumstances for this sort of site-specific pressure 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 the transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD PSV, 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. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. This means development should result in more or better quality natural habitat than there was before development. 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 be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be particularly beneficial 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 standards, on-site renewable energy generation and climate change mitigation and adaptation measures such as net 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. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. In response to the Environment Agency's comments, reference has also been added to Local Plan Policy EN4(f). The impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed and implemented. Compliance with Lambeth Local Plan policies will ensure high standards of sustainability and climate change response are met and potential impacts of development are adequately managed. It is therefore considered the site allocation policy responds positively on these matters.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1 and 6.

The site allocation policy provides good guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, characterful, and sustainable development, therefore delivering positively against 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. Following Reg 18 consultation, the policy text has been amended to reference National Planning Policy Framework requirements on heritage assets.

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. Alternative pay-by-phone parking is available on nearby streets. Conversely, redevelopment of the site will help boost the local economy through increasing the customer base of local businesses (increased population in the area) and through construction work (short-term effect). Positive effects on the economy (e.g. 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 with new commercial workspace and the economic effects of new households on the site. Loss of the car park is counter-balanced by improved air quality and improved health and well-being with fewer people travelling by private car in this local area. Following Reg 18 consultation, Officers met with the InStreatham BID to update it on the progression of the site allocation, and to understand how the site allocation can support the local business community.

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. Following Reg 18, additional testing, including daylight and sunlight, of the indicative height and massing has been undertaken to inform the proposed quanta on site. This has resulted in a reduced quanta of development. This will ensure future development positively responds to local context and does not cause unacceptable harm to local amenity. This will help ensure achievement of SustA objectives 6, 7 and 8, 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.

#### **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 in the table and text above are also 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 including social (e.g. health, education), physical (e.g. transport, water, wastewater, heating) and environmental (e.g. open spaces and green infrastructure) to keep pace with population growth and development proposals in the area. There is some uncertainty over the short-term impact of the loss of car parking, though this will lead to longer term improvements in air quality, reduce greenhouse emissions, and improvements to highways safety in and around the site. Adverse effects related to demolition and construction are considered to be temporary.

## **SA7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11**

**Proposed Site Allocation:** Redevelopment to comprise new workspace to reprovide industrial capacity, replacement community uses and new residential (Approx. 115 to 125 self-contained residential units)

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.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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 / +                        |
| 15. To improve air quality and limit exposure to poor air quality.  | 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. | ++     |
| 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 residential, light industrial floorspace and replacement community use. Reprovision of medical facilities has potential to be reprovided 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 much needed new additional self-contained residential housing to the site. The affordable housing threshold will range from 35% to 50% as the site is in a mix of public and private ownership (42% across the whole site if it comes forward as a comprehensive development). 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 impacts on SustA objectives objective 5, 6, and 7).

The site currently accommodates Wooden Spoon House, which provides paediatric sickle cell and thalassaemia community nursing services. The allocation allows for the facilities to be either reprovided on site or 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 – likewise the opposite may be true if this is moved to a more accessible location for users (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 are 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 facilities that appeal to a wider range of people that can be used for longer hours on weekdays as well as weekends. As a result of the sustainability appraisal, the allocation policy makes clear that Local Plan Policy S2 will apply and an assessment of anticipated impacts on existing social infrastructure should be addressed.

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, 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 use land within the site to widen the footpath along the Kennington Lane frontage to improve pedestrian movement, accessibility and safety. At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play on the way parallel playable routes. The requirements of Local Plan policies Q1 and Q 6 are also now referenced in the SADPD PSV, this will help secure good urban design outcomes and inclusive environments (positive impacts on SustA objective 2, 3 7, 9).

Consideration of community safety early in the design process of the development will result in enhanced 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 community safety results in wide ranging benefits for everybody including many equality groups for example 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. This may be supported in part through any CIL contributions secured from new development. New housing proposed under the SADPD PSV is helping to meet the borough's housing delivery 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 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 the transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD PSV, 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. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better quality natural habitat than there was before development. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain (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 be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, 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 net 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. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f), in reference to adequate remedial treatment of any contaminated land (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. Compliance with Lambeth Local Plan policies ensures high standards of sustainability and climate change response are met and potential impacts of development are adequately managed. It is therefore considered the Kennington Lane site allocation policy responds positively on these matters.

The site allocation policy provides guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against 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. Following Reg 18 consultation, the policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. Lambeth has worked closely with officers at Southwark to demonstrate the site allocation would not harm any heritage assets across the border.

The site is a brownfield site that is currently underutilised, particularly with regard to the vacant community floorspace. The site allocation would likely contribute to sustainable economic growth and employment opportunity through the redevelopment and reprovision of community floorspace, light industrial workspace and new households to the site which will support local economy. Additional text has been added to ensure no net loss of existing industrial floorspace capacity and to confirm "Industrial uses should be completed in advance of occupation of new residential accommodation on the site, unless the applicant can demonstrate to the satisfaction of the LPA that this is not feasible. This requirement will be secured by condition or through a legal agreement." This will help protect industrial land and responds to the GLA's comments at Reg 18 on industrial land use. Applicants are also encouraged to consider the potential to include space for industrial uses that can provide essential services to the CAZ. 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. Following Reg 18, additional testing including daylight and sunlight, of the indicative height and massing has been undertaken to inform the proposed quantum on site. This has resulted in a reduction/increased quantum of development. This will ensure future development positively responds to local context and does not cause unacceptable harm to local amenity, helping to achieve SustA objectives 6, 7 and 8.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1 and 6.

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 such as 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 in the text and 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.

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 site allocation 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 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.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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/+                          |
| 15. To improve air quality and limit exposure to poor air quality.  | 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.              | ++                           |



|  |    |
|--|----|
| 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 residential and community/office floorspace at ground floor. It is considered that the proposed land uses for the site allocation will likely result in positive and significantly positive effects on most social, environmental and economic sustainability objectives. It provides much-needed new additional self-contained residential housing to the site (positive effects on SustA objective 6), with a minimum of 35% required 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 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.

The site allocation will provide for community/office floorspace at ground floor. If at least 1,000sqm office floorspace is proposed, then affordable workspace will be required (in line with Local Plan policy ED2) offering 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 likely to result in facilities that appeal to a wider range of people, that can be used for longer hours, on weekdays as well as weekends. As a result of the 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. (Positive impacts on SustA objectives 2, 3, 4, 7, 8 and 9). 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-uses 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. At the GLA’s request, relevant London Plan policies relating to transport have been incorporated into the relevant ‘Transport, movement and public realm’ section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play on the way parallel playable routes. The requirements of Local Plan policies Q1 and Q 6 are also now referenced in the submission version of the SADPD, this will help secure good urban design outcomes and inclusive environments. (positive impacts on SustA objective 2, 3 7, 9). The text on site access has also been amended to make clear that servicing should be away from Cornwall Road to protect the existing cycle route.

Consideration of community safety early in the design process of the development will result in enhancing 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 community safety results in wide ranging benefits for 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. This may be addressed in part through any CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed in the SADPD PSV will help to meet the borough's housing target in a planned way, and development on these sites will be subject to CIL contributions. 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 also scope in certain circumstances for this sort of site-specific pressure 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 relevant Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD PSV, whether or not they are specifically mentioned in the site allocation policy. As a result of the sustainability appraisal, the allocation policy 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 green or brown roofs. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. This means development should result in more or better quality natural habitat than there was before development. 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 be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, which will reduce carbon emissions of occupation and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be particularly beneficial 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 net 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. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f) (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 high 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 policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. Additional text has been added to say "A desk-based archaeological assessment will be required". This will help achieve positive outcome for heritage and conservation, responding to HE comments at Reg 18. The site is identified as not appropriate for a tall building. The site allocation policy provides guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against SustA Objective 8. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain.

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 opportunities 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 floorspace and new households to the site which will support the local economy. Additional text has been added to ensure that "new residential development on this site should complement and not

compromise the strategic functions of the CAZ”, responding to GLA comments at Reg 18. 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 that particular regard should be paid to the relationship with sensitive residential neighbours on Stamford Street and Cornwall Road. Following Reg 18, additional testing of the indicative height and massing, including daylight and sunlight testing, has been undertaken to inform the proposed quanta on site. This has resulted in a reduced quanta of development. This will ensure future development positively responds to local context and does not cause unacceptable harm to local amenity. This will help ensure achievement of SustA objectives 6, 7 and 8 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 ‘Fire Safety’ and Gateway 1 requirements, helping to achieve SustA Objective 1 and 6.

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 in the text and 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, energy efficiency and the local economy are likely to be permanent, although this will be dependent on the ability for all forms of infrastructure including social (e.g. health, education), physical (eg transport, water, wastewater, heating) and environmental (e.g. 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:** Development to comprise new Residential (which may include an element of extra-care C3 housing) plus offices and/or workspace and replacement cultural, retail and food and drink floorspace. 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.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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/+                          |
| 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><b>Summary appraisal of proposed site allocation</b></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</p> |                              |

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.

The proposed site allocation seeks to accommodate housing. It provides much-needed new additional self-contained residential housing to the site (a minimum of 35% required to be affordable), which may include an element of extra-care if a need is demonstrated (positive effects on SustA objective 6). To meet fast track requirements 70% must be low-cost social rent and 30% intermediate housing.

The site allocation facilitates delivery of mix-use 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. The proposed mix of uses may contribute to the health and well-being of the local community. The re-provision of a range of retail, food and drink uses with active ground floor frontages at the site would positively contribute to liveable mixed-use environments and increase access to, enjoyment of and understanding of nearby 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. Following reg 18 consultation, the policy wording has been amended to enable the delivery of extra-care residential accommodation if a need can be demonstrated. This could provide specific benefits for older persons and those impacted by health issues and disabilities (positive impacts on SustA objectives 1, 2, 3, 4, 5, 7, 8, 9).

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 an 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 a 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. At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play on the way parallel playable routes. The requirements of Local Plan policies Q1 and Q6 are also now referenced in the SADPD PSV, this will help secure good urban design outcomes and inclusive environments (positive impacts on SustA objective 2, 3, 7, 9). Consideration of community safety early in the design process of the development will result in enhancing community safety of the site itself and the immediate local area but also contribute to an improved sense of safety in the wider Waterloo area. Improved community safety results in wide ranging benefits for 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. This may be addressed in part through any CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the SADPD PSV 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 SADPD PSV, 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). 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 green or brown roofs. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better quality natural habitat than there was before development. The policy also sets out an expectation for development to deliver at least 10%

biodiversity net gain. Inclusion of on-site biodiversity improvements should facilitate green stepping-stones / green corridors for species and respond positively to the 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 construction and occupation. There are London Plan and Local Plan policies to mitigate these effects. New housing will be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, this will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be particularly beneficial 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 net 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 of the site will reduce risk of flood damage to homes and businesses. Taking on board comments from the Environment Agency, Development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f), in reference to adequate remedial treatment of any contaminated land. Development is expected to Protect riverside buffer zones and flood defences from further encroachment / development. The policy text now refers to London Plan Policy SI 12(f), in response to comments from the Environment Agency made at Reg 18. Development is expected to Protect riverside buffer zones and flood defences from further encroachment / development. 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 high standards of sustainability and climate change response, manage impacts of potential effects and it is considered the 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 the Westminster World Heritage Site, South Bank Conservation Area and the Old Barge House Alley Conservation Area (in neighbouring Southwark borough). Following Reg 18 consultation, the policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. This will help achieve positive outcome for heritage and conservation. The site is identified as not appropriate for a tall building. The site allocation policy provides guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against SustA Objective 8.

It is considered that the proposed site allocation is likely to have positive impacts on the local economy and employment opportunities. Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing opportunities 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 start 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 development and provision of the cultural, offices and new households to the site which will support local economy. Additional text has been added to ensure that "new residential development on this site should complement and not compromise the strategic functions of the CAZ", responding to GLA comments at Reg 18. 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. Further revisions have been made to the indicative model following high-level daylight/sunlight testing of the massing model in accordance with recognised industry standards. This will help to ensure the amenity of neighbouring properties and future residents is protected. This will ensure achievement of SustA objectives 6, 7 and 8 for both existing residents and consideration of on-site residential amenity for future residents of the site.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1 and 6.

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 in the text and 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.

## **SA17: 330-336 Brixton Road, SW9**

**Proposed Site Allocation:** Development to comprise re-provision of community, light industrial appropriate to the Brixton Creative Enterprise Zone and office uses plus residential.

| <b>Sustainability Appraisal (SustA) Objective</b>   | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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/+                          |
| 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 the delivery of a mixed-use development incorporating residential with re-provision of community, creative industry and office floorspace. It provides new additional self-contained residential housing to the site (positive effects on SustA objective 5, 6 and 7). The affordable housing threshold will range from 35% to 50% as the site is in a mix of public and private ownership. At the GLA's request, clarification has been added to confirm affordable housing thresholds for public/private owned sites. 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 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.

The site allocation will provide replacement of community floorspace for the existing clinical facility (unless the clinical facility is re-provided elsewhere). New purpose-built clinical facilities would provide a significant improvement and more efficient use of space than the current building on site which was originally designed as a residential dwelling, better meeting the needs of staff and service users. 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 facilities that appeal to a wider range of people, that can be used for longer hours, on weekdays as well as weekends. . Re-provision of the existing quantum of office floorspace provides an opportunity for improved accommodation for existing users of WeAre336 (a registered charity that supports disabled people 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 specific needs of WeAre336 staff and service users are considered below.

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 (partly PTAL rating 2 and partly 6a), employment areas and healthcare. The site allocation would enable more people to benefit from its location with good 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 (disabled parking is considered below), 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 petrol station includes a small supermarket, the loss of this use may result in some residents having to travel further for some essentials, though there are various alternatives in proximity to the site, such as those in the Brixton town centre, as well as other convenience stores and food and drink uses approximately 200m north of the site on Brixton Rd. 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. Following Reg 18, the policy text has been amended to ensure any proposals provides disabled parking to meet the needs of the building's users, subject to an evidenced justification.

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. At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play on the way parallel playable routes. The requirements of Local Plan policies Q1 and Q6 are also now referenced in the SADPD PSV, this will help secure good urban design outcomes and inclusive environments (positive impacts on SustA objective 2, 3, 7, 9). Consideration of community safety early in the design process of the development will result in enhanced 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-use 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 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. This may be addressed in part through any CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed under the SADPD PSV 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 the transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD PSV, 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 site 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. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. This means development should result in more or better quality natural habitat than there was before development. 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 be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be particularly beneficial 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 net 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. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f), in reference to adequate remedial treatment of any contaminated land. Loss of the petrol station will result in reduced 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 high 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.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 6.

The site allocation policy provides guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against 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. Following Reg 18 consultation, the policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. Additional text has also been added to say "A desk-based archaeological assessment will be required". This will help achieve positive outcome for heritage and conservation, responding to HE comments at Reg 18. The site allocation recognises the petrol station with forecourt canopy, totem sign and retail unit harms the appearance of the conservation area, the 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 re-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, text has been added to ensure any future development re-provides the existing quantum of office floorspace following Reg 18 consultation. 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. Text has been added stating 'redevelopment should include new light industrial workspace appropriate to the Brixton Creative Enterprise Zone (in accordance with London Plan Policy HC5C); and new housing, including affordable housing'. This will ensure

new workspace contributes towards the objectives of the CEZ, and responds to the GLA's comments at Reg 18. 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. Following Reg 18, additional testing of the indicative height and massing, including daylight and sunlight, has been undertaken to inform the proposed quanta on site. This has resulted in a reduced quantum of development, though will ensure future development positively responds to local context and does not cause unacceptable harm to local amenity, helping to achieve SustA objectives 6, 7 and 8.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1 and 6.

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 such as 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 described in the text and 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.

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 site allocation policy seeks to mitigate this risk by requiring phased development to address the vision for the wider site. Council officers have engaged with landowners to encourage and facilitate comprehensive development at the 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. Existing occupants and service users of WeAre336 may be affected by future development at the site during the construction process, though the impact would likely be temporary.

## **SA18: 300-346 Norwood Road, SE27**

**Proposed Site Allocation:** Development to comprise a mix of commercial (to include flexible workspace) and community uses, replacement light industrial workspace, plus additional residential. Shops, food and drink uses will 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.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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/+                          |
| 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 residential, commercial/community floorspace, to include at least 1,123 sqm GIA light industrial workspace. A mix of town-

centre appropriate uses will be provided at street level along Norwood Road. These uses will be restricted so at least 50 per cent or units within the primary shopping area are shops, along side other town centre and community uses.

The site allocation also 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 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.

Following Reg 18, the decision was made to reduce the site boundary by excluding the two areas of existing housing at the north eastern and south western end of the site. It has also been reduced to exclude the site known as 'the laundry' as development is already under construction. As a result, there has been a reduction in the amount of residential, commercial / community floorspace envisaged, however, overall, it is envisaged that the policy would continue to provide an overall increase in floorspace associated with these uses, while still providing significant opportunities for sustainable place-making, supporting the full range of SustA objectives. When taken in the round, the changes are considered to have had a neutral effect on the SustA scoring since the Reg 18 SustA was undertaken.

The provision of light industrial workspace and commercial/community space, including retail premises along Norwood Road, provides employment and business opportunities for local people and contributes to the local economy. The site allocation policy reduces the need for local people to travel for employment and training opportunities. It also encourages the particular opportunity to provide jobs and training opportunities for local people within town centres sectors such as retail, hospitality and leisure, but also other industries, including creative businesses. Focusing opportunities 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 impacts on SustA objectives 5, 7, 16 and 18).

The re-provision of community floorspace is made possible through the inclusion of flexible commercial/community space appropriate to the town centre location as part of the proposed land uses. 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 proposal is likely to result in facilities that appeal to a wider range of residents, businesses and organisations, that can be used for longer hours, on weekdays as well as weekends.

The site is in an excellent location with easy access to key services and facilities in West Norwood including shopping areas, a health and leisure centre, cultural venues (Picture House / theatre), local green spaces, public transport, employment areas (e.g. West Norwood Key Industrial Business Area (KIBA)) and healthcare services. The site allocation would enable more people to benefit from its location with very good public transport accessibility (PTAL 6a), where West Norwood (which has step-free access) and Tulse Hill train stations, and several bus services on the high street can be accessed. Development will be car-free, and together with the loss of the petrol station, is likely to have a significantly positive impact on the health and wellbeing particularly of people with long-term health conditions, older people and younger people. It will also improve local air quality and help to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 9, 12 and 15).

The site allocation policy also has the potential to promote accessible and inclusive environments and encourage walking, cycling and the use of public transport, particularly through new and reconfigured streets that will increase permeability through the site. This will include a reduced number of vehicular access points, new internal service loop designed safely to accommodate pedestrians and cyclists, improvements to north-south pedestrian and cyclist links between York Hill and Lansdowne Hill, and improved east-west pedestrians and cyclist connections between the York Hill Estate and Norwood Road. The site allocation policy also expects improvements to the public realm along Norwood Road, resulting from setting back the building line, and 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.

At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the 'Transport, movement and public realm' section of the policy text. The text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play-on-the-way parallel playable routes. The requirements of Local Plan policies Q1 and Q6 are also now referenced in the of the SADPD PSV, which will help secure good urban design outcomes and inclusive environments. (positive impacts on SustA objective 2, 3, 7, 9). This also has potential to offer significant positive effects on local place shaping 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 an enhanced community safety for the site itself and the immediate local area but also contribute to an improved sense of safety in the wider West Norwood area. Improved community safety will result 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required to support the planned growth. New housing and affordable housing proposed under the SADPD PSV will help to meet the borough's housing delivery target in a planned way while development on the sites will be subject to CIL contributions, which will help finance the infrastructure required. 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 for site-specific pressure to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies such as policy S2 on social infrastructure, policy EN1 on green infrastructure and various other policies in the transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD Proposed Submission Version, whether or not they are specifically mentioned in the site allocation policy. As a result of the sustainability appraisal, the allocation policy now makes clear that the requirements of Local Plan Policy S2, including the assessment of anticipated impacts on existing social infrastructure, should be addressed.

The allocation policy states that new streets should be tree-lined and significant levels of greening should be provided through new areas of public realm, including the new public space. This new green infrastructure will improve health and well-being for those living, working and visiting the area. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better-quality natural habitat than there was before development. The policy also sets out an exception for development to deliver at least 10% biodiversity net gain. 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 be expected to have high levels of energy performance in accordance with London Plan Policy SI 2, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be particularly beneficial 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 net 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. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f), in reference to adequate remedial treatment of any contaminated land (positive effects on SustA objective 13).

The eventual impact of the site allocation on the environmental SustA Objectives will depend on the detailed design measures proposed by the applicant(s) and finally implemented. Compliance with Lambeth Local Plan policies ensures high stand of sustainability and climate change response are met, and potential impacts of development are adequately managed. It is therefore considered that SA18 Norwood Road's site allocation policy will respond positively on these matters.

The site allocation policy provides guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against SustA Objective 8. Following Reg 18 consultation, the policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. 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 providing additional housing at the site, which will all contribute to the local economy. The site allocation policy seeks to restrict the proliferation of certain town centre uses, 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.

Following Reg 18, the policy text has been amended to ensure that new development provides at least 1,123 sqm GIA of light industrial workspace. Applicants are also now encouraged to consider the potential to include space for industrial uses that can provide essential services to the CAZ in accordance with paragraph 6.4.7 of the London Plan 2021. Positive effects on the economy (i.e. 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. Further revisions have been made to the indicative model following high-level daylight/sunlight testing of the massing model in accordance with recognised industry standards. This will ensure future development positively responds to local context and does not cause unacceptable harm to local amenity, helping to achieve SustA objectives 6, 7, and 8.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objectives 1 and 6.

Overall, the site allocation policy comprehensively addresses all components of sustainable placemaking 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, 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 in the text and table above are 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 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. However, this will depend on the ability for all forms of infrastructure, such as social (e.g. health, education), physical (e.g. transport, water, wastewater, heating) and environmental (e.g. 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.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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/+                          |
| 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 new residential units. 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.

A replacement supermarket would provide employment opportunities for local people, contribute 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, 9 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 significant improvement to the pedestrian environment, including wider footway along Acre Lane and urban greening; and improved cycle infrastructure.

At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as "play on the way parallel playable routes". The requirements of Local Plan policies Q1 and Q6 are also now referenced in the SADPD PSV. This will help secure good urban design outcomes and inclusive environments (positive impacts on SustA objective 2, 3, 7, 9). It will also 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 mobility 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. Officers have engaged with the GLA to try to ensure that the future provision for parking is a reduction from the existing quantum in order to achieve key London Plan, Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. At the application stage, the level of customer parking provision on site must be informed by appropriate parking assessment(s), to justify any level of parking over and above London Plan standards. Car parking which is re-provided should focus on disabled parking and enable electric vehicle charging. A reduction in car parking on site and promotion of active travel will result in positive impacts on SustA objectives 7, 9, 12 and 15.

Consideration of community safety early in the design process of the development will result in enhanced 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 a mix-used development there will be 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 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. This may be addressed in part through any CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing promoted in the SADPD PSV would help 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 to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies including 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 SAPDP, whether or not they are specifically mentioned in the site allocation policy. As a result of the 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). The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better quality natural habitat than there was before development. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. 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 be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be of 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 net 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. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f) in reference to adequate remedial treatment of any contaminated land. 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 high 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 guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against 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. Following Reg 18 consultation, the policy text has been amended to reference National Planning Policy Framework requirements on heritage assets.

Following Reg 18, additional testing of the indicative height and massing, including daylight and sunlight, has been undertaken to inform the proposed quantum on site. This has resulted in an increased quantum of development (180-210 units). 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.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1 and 6.

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 reversion of the supermarket and new households to the site which will support local economy. Positive effects on the economy (e.g. 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 in the text and 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, including social (e.g. health, education), physical (e.g. transport, water, wastewater, heating) and environmental (e.g. 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: 51-57 Effra Road, SW2**

**Proposed Site Allocation:** Redevelopment to comprise new light industrial workspace appropriate to the Brixton Creative Enterprise Zoe and new housing (approx. 85-95 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.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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/+                          |
| 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 redevelopment incorporating light industrial workspace and new housing, including affordable housing. 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.

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. Following Reg 18, text has been added to require industrial uses to be completed in advance of occupation of the new residential accommodation on the site, unless the applicant can demonstrate to the satisfaction of the LPA that this is not feasible.

The Mosaic Clubhouse building and the place of worship have been removed from the site allocation, therefore the policy no longer requires these to be reprovided. If these parts of the site were to come forward separately, Policy S1 would apply, requiring replacement floorspace of an equivalent or better functionality. This change to the site allocation is considered to have a neutral effect on 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.

At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The requirements of Local Plan policies Q1 and Q6 are also now referenced in the SADPD PSV. This will help secure good urban design outcomes and inclusive environments (positive impacts on SustA objective 2, 3, 7, 9). Consideration of community safety early in the design process of the development will result in enhanced 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. This may be addressed in part through any CIL contributions secured from new development. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing proposed in the SADPD PSV 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 SADPD PSV, 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. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better quality natural habitat than there was before development. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. 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 be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be particularly beneficial 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 net 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. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f) following Reg 18, in reference to adequate remedial treatment of any contaminated land. 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 high 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, following Reg 18 consultation, the policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. The site is not identified as appropriate for tall building development.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1 and 6.

The site allocation appropriately confirms residential accommodation should meet all relevant internal and external amenity standards and requirements. Daylight/sunlight testing of the massing model has been undertaken in accordance with recognised industry standards. This will help to ensure the amenity of neighbouring properties and future residents is protected. This will help make a positive contribution towards SustA Objectives 6, 7 and 8.

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 homes to the site which will support local economy. Positive effects on the economy (e.g. 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.

#### **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 in the text and 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 including social (e.g. health, education), physical (e.g. transport, water, wastewater, heating) and environmental (e.g. 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. 50-70 self-contained residential units) including affordable housing.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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/+                          |
| 15. To improve air quality and limit exposure to poor air quality.  | 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.              | +/?                          |
| 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 light industrial workspace and residential. It provides for new additional self-contained residential housing to the site (positive effects on SustA objective 6). As the site is in a mix of public and private ownership, the affordable housing threshold will be 50 per cent for development on any part of the site that is publicly owned; and 35 per cent on private land if there is no net loss of industrial floorspace capacity, or 50 per cent if there is a net loss in this capacity.

The affordable housing threshold is 50 per cent for public sector land; and 35 per cent on private land if there is no net loss of industrial floorspace capacity, or 50 per cent if there is a net loss in this capacity, in accordance with London Plan policy

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 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. Text has been added to the policy stating 'redevelopment should include new light industrial workspace appropriate to the Brixton Creative Enterprise Zone (in accordance with London Plan Policy HC5C). This will ensure new workspace contributes towards the objectives of the CEZ, responding to the comments received from the GLA at Reg 18 consultation. The site allocation policy reduces the need for local people to travel for employment and training opportunities. It also encourages the particular opportunity to provide jobs and skills training opportunities for local people in the creative and digital sectors. Focusing these opportunities 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 impacts on SustA objectives 5, 7, 16 and 18).

The site is within walking distance of Loughborough Junction Local Centre which offers a supermarket, fresh food, cafes and restaurants, pharmacies and public transport options. A wider range of services and facilities are available in Brixton major centre, which is about 1km away, and Herne Hill district centre, which is approximately 1.3km away. King's College Hospital is also close by. The site allocation would enable more people to benefit from its location, serviced by national rail and bus lines (although Loughborough Junction rail station is not step-free), and relatively close to the wider amenities of Brixton town centre. Development will be car-free and will improve pedestrian routes, cycle routes and cycle infrastructure, which will have a significant positive impact on the health and wellbeing particularly of people with long-term health conditions, older people, and younger people. It will also improve air quality and help to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 12 and 15).

The site allocation policy also has the potential to promote accessible and inclusive environments and encourage walking, cycling and the use of public transport. Improved pedestrian movement through the area will have positive benefits for many, including those with mobility difficulties, people with disabilities, older people and families with very young children.

At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the 'Transport, movement and public realm' section of the policy text. The text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play-on-the-way parallel playable routes. The requirements of Local Plan policies Q1 and Q6 are also now referenced in the SADPD PSV, which will help secure good urban design outcomes and inclusive environments (positive impacts on SustA objective 2, 3, 7, 9).

Consideration of community safety early in the design process of the development will result in enhanced community safety for the site itself and the immediate local area but also contribute to improved sense of safety in the wider Loughborough Junction area. Improved community safety will result in wide ranging benefits for everybody, including many equality groups such as 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. New housing and affordable housing help to reduce overcrowding and meet unmet need. New housing and affordable housing proposed under the SADPD PSV will help to meet the borough's housing delivery target in a planned way and development on the site will be subject to CIL contributions. 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. This may be supported in part through any CIL contributions secured from new development. 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. local plan policy S2 on social infrastructure, policy EN1 on green infrastructure and various other policies in the transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD PSV, whether or not they are specifically mentioned in the site allocation policy. As a result of the sustainability appraisal, the allocation policy now makes clear that the requirements of Local Plan Policy S2, including the 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 the area. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better-quality natural habitat than there was before development. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. 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 be expected to achieve high levels of energy performance in

accordance with London Plan Policy SI2, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be particularly beneficial 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 net 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 of the site that will help reduce surface water flood risk to the site and neighbouring properties. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f), in reference to adequate remedial treatment of any contaminated land (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 high standards of sustainability and climate change response, manage impacts of potential effects and it is considered SA22 Harless Street site allocation policy responds positively on these matters.

The site allocation policy provides guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against SustA Objective 8. Heritage assets are appropriately acknowledged and protected by the allocation policy (ie Loughborough Park Conservation Area). Following Reg 18 consultation, the draft policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. 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 "ckno'ldges neighbour relationships and states particular regard should be paid to the relationship with sensitive residential neighbours on Wanless Road. Following Reg 18, additional testing of the indicative height and massing, including daylight and sunlight, has been undertaken to inform the proposed quanta on site. This has resulted in a reduction in the quantum of development. This will ensure future development positively responds to local context and does not cause unacceptable harm to local amenity, helping to achieve SustA objectives 6, 7 and 8.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objectives 1 and 6.

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 reversion of light industrial workspace and new households to the site which will support local economy. Additional text has been added to ensure industrial uses should be completed in advance of occupation of new residential accommodation on the site, unless the applicant can demonstrate to the satisfaction of the LPA that this is not feasible. This requirement will be secured by condition or through a legal agreement. This will help protect industrial land and responds to the GLA's comments at Reg 18 on industrial land use. Positive effects on the economy (e.g. 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 placemaking 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, 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 in the text and table above are 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. However, this will depend on the ability for all forms of infrastructure, including social (e.g. health, education), physical (e.g.



transport, water, wastewater, heating) and environmental (e.g. 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 active frontage at ground floor with replacement community uses or alternative town centre uses (Class E) and residential on upper floors within local centre boundary, plus creative workspace outside of the local centre and residential

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/ Likely effects</b> |
|---|------------------------------|
| 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.   | 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/+                          |
| 15. To improve air quality and limit exposure to poor air quality.  | 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.              | ++                           |
| 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 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 flexible and creative workspace uses along Junction Yard outside the town centre boundary along Junction Yard. It will promote new additional self-contained housing on this site. The threshold level of affordable housing will be required, which is 35% where land 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.

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. The policy text has been strengthened following Reg 18 to ensure that flexible and creative workspace is appropriate to the Brixton Creative Enterprise Zone. Additional text has also been added to ensure no net loss of existing industrial floorspace capacity and to confirm 'Industrial uses should be completed in advance of occupation of new residential accommodation on the site, unless the applicant can demonstrate to the satisfaction of the LPA that this is not feasible. This requirement will be secured by condition or through a legal agreement.' This will help protect industrial land and responds to the GLA's comments at Reg 18 on industrial land use. The site allocation policy will reduce the need for local people to travel for employment and training opportunities. It encourages the particular opportunity to provide jobs and skills training opportunities for Lambeth residents in the creative and digital sectors. Text has been added stating 'redevelopment should include new light industrial workspace appropriate to the Brixton Creative Enterprise Zone (in accordance with London Plan Policy HC5C); and new housing, including affordable housing'. This will ensure new workspace contributes towards the objectives of the CEZ, and responds to comments from the at Reg 18. Focusing these opportunities 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 impacts on SustA objectives 5, 7, 16 and 18).

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. Specific reference to policy S2 has been incorporated into the SA DPD. This is likely to result in development involving facilities that appeal to a wider range of people which are used more extensively throughout the day.

Most of the site is within Loughborough Junction Local Centre town centre boundary, which offers supermarket, fresh food, cafes and restaurants, pharmacies and public transport options. 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, 9, 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. At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the relevant 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as "play on the way parallel playable routes". The requirements of Local Plan policies Q1 and Q6 are also now referenced in the submission version of the SADPD, this will help secure good urban design outcomes and inclusive environments (positive impacts on SustA objective 2, 3, 7, 9).

Consideration of community safety early in the design process of the development will result in enhanced community safety of the site itself and the immediate local area. It will also contribute to an improved sense of safety in the wider Loughborough Junction area. Improved 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 and the Infrastructure Delivery Plan set out housing delivery targets and the infrastructure required in order to support this planned growth. New housing proposed under the SADPD PSV is helping to meet the borough's housing delivery 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. This may be addressed in part through any CIL contributions secured from new development. There is also scope in certain circumstances for this sort of site-specific pressure 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 various policies in the transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD PSV, 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. The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better quality natural habitat than there was before development. The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. 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 be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, which will reduce carbon emissions and fuel bills (positive effects on SustA 12, 5, 6, 2). This will be particularly beneficial 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 net 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. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f) in reference to adequate remedial treatment of any contaminated land (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 high 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 guidance to positively influence townscape. Site-specific design principles will help achieve high quality, attractive, contextual, and sustainable development, therefore, delivering positively against SustA Objective 8. Following Reg 18 consultation, the draft policy text has been amended to reference National Planning Policy Framework requirements on heritage assets. The site is not appropriate for a tall building.

The site allocation appropriately acknowledges neighbour relationships and states particular regard should be paid to the relationship with adjoining railway viaduct. Following Reg 18, additional testing, of the indicative height and massing has been undertaken, including daylight and sunlight, to inform the proposed quanta on site. This will ensure future development positively responds to local context and does not cause unacceptable harm to local amenity, helping to achieve SustA objectives 6, 7, and 8.

Following Reg 18, the policy text has been amended to state that developments must achieve high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1 and 6.

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 provision of flexible and creative workspaces, and new households to the site which will support local economy. Additional text has been added to ensure 'Industrial uses should be completed in advance of occupation of new residential accommodation on the site, unless the applicant can demonstrate to the satisfaction of the LPA that this is not feasible. This requirement will be secured by condition or through a legal agreement.' This will help protect industrial land and responds to the GLA's comments at Reg 18 on industrial land use. Positive effects on the economy (e.g. 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 in the text and 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, such as social (e.g. health, education), physical (e.g. transport, water, wastewater, heating) and environmental (e.g. 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:** Optimise capacity for clinical uses across the site, including in the KIBA. Change of use from business and storage use to hospital and associated uses within King’s Business Park (part of Coldharbour Lane Estate and Bengeworth Road Depot Key Industrial and Business Area) will be supported to enable reconfiguration and optimisation of the hospital estate for clinical service provision and associated research and development activity.

| <b>Sustainability Appraisal (SustA) Objectives</b>  | <b>Score/<br/>Likely effects</b> |
|---|----------------------------------|
| 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.   | ++                               |
| 15. To improve air quality and limit exposure to poor air quality.  | 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.              | + / ++                           |
| 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 hospital and medical 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.

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, and 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, further afield, Brixton. 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 in the local area, within Lambeth, Greater London and, potentially nationally.

The site allocation policy promotes 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 Healthy Route Network. Such public realm improvements will result in improved accessibility for those with mobility difficulties, including people with disabilities, older people and families with very young children. Improved opportunities for active travel, along with the fact that this will be a car-free development, will bring significant health and well-being benefits, particularly for people with long-term health conditions, older people and younger people. It will also improve air quality and help to mitigate climate change (positive impacts on SustA objectives 2, 5, 7, 9, 12 and 15).

At the GLA's request, relevant London Plan policies relating to transport have been incorporated into the 'Transport, movement and public realm' section. The policy text has also been amended to state that landscaping should incorporate children and young people friendly features, such as play-on-the-way parallel playable routes. The requirements of Local Plan policies Q1 and Q6 are also now referenced in the SADPD PSV, this will help secure good urban design outcomes and inclusive environments. (positive impacts on SustA objective 2, 3, 7, 9)

Consideration of community safety early in the design process of the development will result in enhanced community safety for the site itself and the immediate local area, but also contribute to improved sense of safety in the wider area. Improved community safety results in wide ranging benefits for everybody including many equality groups, such as 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 land use (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 in number of visitors, including patients and relatives, as well as 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 site-specific pressure to be mitigated through planning obligations (s106 contributions). This is allowed for in Local Plan policies such as policy S2 on social infrastructure, policy EN1 on green infrastructure and various other policies in the transport section. All Local Plan policies apply to the sites that are subject to proposed new site allocations in the SADPD PSV, whether or not they are specifically mentioned in the site allocation policy. As a result of the sustainability appraisal, the allocation policy now makes clear that the requirements of Local Plan Policy S2, including the assessment of anticipated impacts on 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). The policy text has been amended in response to the Environment Agency's comments, to ensure that new development delivers biodiversity objectives. This means development should result in more or better-quality natural habitat than there was before development. . The policy also sets out an expectation for development to deliver at least 10% biodiversity net gain. Inclusion of on-site biodiversity improvements should take account of the biodiversity value of the adjacent Ruskin Park. Extensive new green infrastructure resulting from the compliance with the London Plan policy G5 and the pursue of the recommended Urban Greening Factor (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. Any proposal to relocate the safeguarded waste use would need to be carried out in accordance with both London Plan Policy SI 9 and Lambeth Local Plan Policy EN7. The policy text was updated to reference this following Reg 18, in response to comments from the GLA (positive effects on SustA objective 14).

New buildings will have significantly better energy performance than existing buildings, which will reduce future carbon emissions and fuel bills (positive effects on SustA 2 and 12). 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 net 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 residential properties and businesses. Taking on board comments from the Environment Agency, development should also protect groundwater from contamination sources. Reference has also been added to Local Plan Policy EN4(f) in reference to adequate remedial treatment of any contaminated land (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 high 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 site-specific guidance to preserve the significance (including setting) of heritage assets. Following Reg 18 consultation, the draft policy text has been amended to reference National Planning Policy Framework requirements on 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, attractive, contextual, and sustainable development, therefore, delivering positively against 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, particularly Northlands Street and Venetian Road, including overlooking, loss of daylight, overshadowing and noise pollution. Further revisions have been made to the indicative model following high-level daylight/sunlight testing of the massing model in accordance with recognised industry standards, helping to achieve SustA objectives 6, 7 and 8.

Following Reg 18, the policy text has been amended to state that developments must achieve the high standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements, helping to achieve SustA Objective 1.

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 opportunities 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 (i.e. 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 placemaking 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, 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 in the text and table above are 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. However, this will depend on the ability for all forms of infrastructure, including social (e.g. health, education), physical (e.g. transport, water, wastewater, heating) and environmental (e.g. 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.



## 5. NEXT STEPS AND MONITORING

- 5.1 Stage E of the SustA process requires authorities to monitor the implementation of the plan to ensure any unforeseen adverse effects are identified. This ensures there are opportunities to put in place remedial measures where necessary.
- 5.2 The Council has identified specific issues under each SA Objective in order to assess the sustainability effects of the SADPD. These are set out in the table below. The Monitoring Framework provides suggestions for the future monitoring programme for the Local Plan and will act as a method of assessment of the SADPD implementation once this is adopted informing future reviews of the Local Plan.
- 5.3 The monitoring indicators are based on those developed in the SustA report for the Lambeth Plan 2021 as these documents share similar overarching sustainability objectives and are intended to be read together when determining planning applications.
- 5.4 The Council reports annually on the performance of its planning policies as set out in the Local Plan as a whole. Lambeth's Authority Monitoring Reports (AMR) brings together data including housing development pipeline report (includes completions and affordable housing), student accommodation assessment, hotel and visitor accommodation and commercial development pipeline report, as well as CIL and S106 contributions and spending. Following adoption of the SADPD, progress with implementation of the site allocations will be reported in the Council's annual Authority Monitoring Report. Data on the implementation of the SADPD will be collected from planning applications.
- 5.5 Officers will also have the opportunity to appraise development that comes forward on sites allocated in the SADPD at the application stage. Development proposals will be considered against the development plan as a whole. It is noted that existing policies within the Local Plan 2021 were assessed using a similar SustA Framework to the SADPD, therefore the SustA objectives are embedded in all Local Plan policies. Certain development will also be screened to understand whether a separate Environmental Impact Assessment is required. Further, the Public Sector Equality Duty will apply directly to all planning decisions, so equality impact assessment also be undertaken as part of the decision-making process. In granting planning permission, officers may use planning conditions and legal agreements to

ensure that development accords with the development plan policies, while also ensuring that suitable mitigation measures are in place. As such, the planning application stage represents an initial stage of the monitoring process, providing initial feedback and evidence that will inform AMR and the next Local Plan Review, while also providing an opportunity to mitigate any negative impacts through planning conditions and legal agreements.

5.6 Plan making authorities are required to review their Local Plan every five years. This provides an opportunity to look again at the plan policies and the implementation of SADPD policies and assess their effectiveness. There are monitoring indicators in the Plan that help determine how policies are working in practice and how successful they are. This information will be used to consider whether policies may need to change during the next review. Additional detailed evidence will also be gathered on key topics such as housing, economy, and climate change to inform changes to Plan, alongside stakeholder engagement with local communities, landowners, neighbouring boroughs, the GLA, and other statutory bodies.

5.7 The table below sets out potential indicators to measure performance against the SustA objectives.

**Table 10: Potential indicators for monitoring SA**

| Topic | Objective  | Potential Indicators   |
|-------|--|--|
| 1     | Crime and safety. Ensuring safe communities with reduced crime and disorder.   | <ul style="list-style-type: none"> <li>Percentage of proposals directly incorporating 'Secured by Design', 'Designing Out Crime' and 'Safer Places' principles or receiving Secure by Design accreditation</li> <li>Recorded crimes per 1,000 households</li> <li>Resident surveys on perception of crime and level of safety in town centres</li> <li>Resident surveys on perception of crime and level of safety in public open spaces.</li> </ul>   |
| 2     | Good health and wellbeing. Promote a healthy community, including reducing health inequalities and the causes of ill health.   | <ul style="list-style-type: none"> <li>Infrastructure Delivery Plan updates</li> <li>Amount of open space lost through completed planning permissions</li> <li>Housing supply: number of net additional dwellings completed</li> <li>Tenure of new affordable housing (completions and approvals)</li> <li>Modal Share – walking, cycling and public transport</li> <li>Number of cycle parking spaces provided in completed major developments</li> <li>Number of disabled parking spaces per completed major development</li> <li>Life expectancy</li> <li>Deaths from heart disease less than 75 years</li> </ul> |
| 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. | <ul style="list-style-type: none"> <li>Number of disabled parking spaces per completed major development</li> <li>Modal Share – walking, cycling and public transport</li> <li>Infrastructure Delivery Plan updates</li> <li>Average distance of households and bus stations to health/medical centres</li> <li>Proximity of new housing developments to services, facilities and employment</li> </ul>  |
| 4     | Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.  | <ul style="list-style-type: none"> <li>Infrastructure Delivery Plan updates</li> <li>Quantum of new social infrastructure provided</li> </ul>  |
| 5     | Equality and diversity. To tackle poverty and social exclusion and ensure  | <ul style="list-style-type: none"> <li>Gross affordable housing - % of habitable rooms in major developments (completions and approvals)</li> <li>Tenure of new affordable housing (completions and approvals)</li> </ul>  |

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|   | equitable outcomes for all communities, particularly protected equality groups.   | <ul style="list-style-type: none"> <li>• Net additional student bedspaces completed</li> <li>• Number of specialist older persons housing units completed</li> <li>• Gypsy and traveller pitches</li> <li>• Proportion of major application approvals that make provision for Affordable Workspace (in parts of borough covered by policy ED2)</li> <li>• Number of disabled parking spaces per completed major development</li> <li>• Infrastructure Delivery Plan updates</li> </ul>   |
| 6 | Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.   | <ul style="list-style-type: none"> <li>• Housing supply: number of net additional dwellings completed</li> <li>• Gross affordable housing - % of habitable rooms in major developments (completions and approvals)</li> <li>• Tenure of new affordable housing (completions and approvals)</li> <li>• Net additional student bedspaces completed</li> <li>• Number of specialist older persons housing units completed</li> <li>• Gypsy and traveller pitches</li> </ul>   |
| 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. | <ul style="list-style-type: none"> <li>• Proportion of vacant units in Brixton and Streatham Major centres, Clapham, Vauxhall and West Norwood District centres and Lower Marsh/The Cut CAZ Frontage.</li> <li>• Modal Share – walking, cycling and public transport</li> <li>• Number of cycle parking spaces provided in completed major developments</li> <li>• Number of disabled parking spaces per completed major development</li> <li>• Amount of open space lost through completed planning permissions</li> <li>• Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score</li> <li>• Infrastructure Delivery Plan updates</li> <li>• Diversity of resident ethnicity</li> <li>• Resident surveys on satisfaction parks and open spaces</li> <li>• Resident surveys on perception of crime and level of safety in public</li> <li>• Level of population churn</li> </ul> |
| 8 | Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment  | <ul style="list-style-type: none"> <li>• Amount of open space lost through completed planning permissions</li> <li>• Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score</li> </ul>   |

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|    | through high quality design and protection of open space, valued views and designated and non-designated historic assets.  | <ul style="list-style-type: none"> <li>• Number of heritage assets on the 'at risk' register</li> <li>• Number of conservation areas with up-to-date character appraisals</li> <li>• Infrastructure Delivery Plan updates</li> <li>• Number of listed buildings within the borough</li> <li>• Number of registered parks and gardens</li> </ul>  |
| 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. | <ul style="list-style-type: none"> <li>• Modal Share – walking, cycling and public transport</li> <li>• Number of cycle parking spaces provided in completed major developments</li> <li>• Number of disabled parking spaces per completed major development</li> <li>• Infrastructure Delivery Plan updates</li> </ul>  |
| 10 | Biodiversity. To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible.   | <ul style="list-style-type: none"> <li>• Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score</li> <li>• Amount of open space lost through completed planning permissions</li> <li>• Change in areas of biodiversity importance</li> <li>• Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)</li> <li>• The achievement of BAP targets</li> <li>• The change in area and condition of BAP habitats/species</li> <li>• The change in area of Sites of Importance for Nature Conservation</li> <li>• Percentage of borough by area located in an access to nature deficiency area</li> </ul> |
| 11 | Green infrastructure. To create, manage and enhance green infrastructure.  | <ul style="list-style-type: none"> <li>• Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score</li> <li>• Amount of open space lost through completed planning permissions</li> <li>• Change in areas of biodiversity importance</li> <li>• Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)</li> </ul>  |
| 12 | Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of   | <ul style="list-style-type: none"> <li>• Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score</li> <li>• Amount of open space lost through completed planning permissions</li> <li>• Change in areas of biodiversity importance</li> </ul>   |

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|    | renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.                                    | <ul style="list-style-type: none"> <li>• Number of major application approvals for non-residential developments achieving BREEAM Excellent</li> <li>• Carbon dioxide emission reductions against Part L building regulation requirements in approved major developments</li> <li>• Number of buildings built to Home Quality Mark or Passivhaus standard</li> <li>• Number of District Heat Networks in the borough and dwellings/premises linked to them</li> <li>• The proportion of schemes achieving policy requirements relating to carbon dioxide emission reductions</li> </ul>   |
| 13 | Water resources and flood risk management. To protect and manage water resources (including groundwater) and to minimise flood risk.   | <ul style="list-style-type: none"> <li>• Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems</li> <li>• Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues.</li> <li>• Infrastructure Delivery Plan updates</li> </ul>   |
| 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. | <ul style="list-style-type: none"> <li>• New waste capacity (tonnes) by management type (recycling/composting, recovery, transfer and disposal) and type of wastes handled (HIC and CD&amp;E)</li> <li>• Loss of waste sites to other uses. Location and amount of compensatory capacity</li> <li>• Infrastructure Delivery Plan updates</li> </ul>  |
| 15 | Air quality. To improve air quality and limit exposure to poor air quality.  | <ul style="list-style-type: none"> <li>• Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score</li> <li>• Amount of open space lost through completed planning permissions</li> <li>• Change in areas of biodiversity importance</li> <li>• Carbon dioxide emission reductions against Part L building regulation requirements in approved major developments</li> <li>• Infrastructure Delivery Plan updates</li> <li>• Percentage of residents with health problems related to air pollution/quality</li> <li>• Improvement of air quality at the monitoring stations around the Borough</li> </ul> |
| 16 | Local economy. To encourage and accommodate sustainable and resilient  | <ul style="list-style-type: none"> <li>• Net change in E(g)(i) floorspace through completed developments</li> </ul>  |

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|    | economic growth, and employment opportunity.  | <ul style="list-style-type: none"> <li>• Net loss of E(g)(i) floorspace through completed Prior Approval developments (permitted development for change of use from office to residential)</li> <li>• Proportion of major application approvals that make provision for Affordable Workspace (in parts of borough covered by policy ED2)</li> <li>• Net change in completed E(g)(ii &amp; iii) B2 and B8 floorspace in KIBAs and outside KIBAs</li> <li>• Proportion of original ground floor units in town centres uses (Class E (a, b, c) in primary shopping areas</li> <li>• Net additional visitor accommodation bedspaces</li> <li>• Unemployment rates</li> <li>• Number of businesses registered in the Borough</li> <li>• Number of vacant premises in town centres</li> <li>• Total amount of additional employment floor-space, by type</li> <li>• Total amount of employment floor-space, by type</li> <li>• Total amount of floor-space for 'town centre uses'</li> </ul> |
| 17 | Regeneration and efficient use of land.<br>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. | <ul style="list-style-type: none"> <li>• Number of existing vacant or dilapidated / derelict buildings brought back into use</li> <li>• Number of regeneration projects completed in deprived areas.</li> <li>• Housing supply: number of net additional dwellings completed</li> </ul>  |
| 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.   | <ul style="list-style-type: none"> <li>• Employment rates</li> <li>• Local Labour in construction Number of local recruitments secured via s106</li> <li>• Funding secured for Employment and Training</li> <li>• Funding secured for Community Connections Fund</li> </ul>  |

## Next Steps

- 5.8 The table below sets out potential indicators to measure performance against the SustA objectives. Indicators highlighted yellow may be reported for each site allocation in the yearly Authority Monitoring Reports (where information is available).
- 5.9 This SustA report will be consulted on alongside the Regulation 19 SADPD. Consultation on the SustA will follow the same guidelines and requirements for consultation as the DPD itself, as per the District Council's Statement of Community Involvement (SCI).
- 5.10 The results of the consultation will be submitted to the Secretary of State. Any significant changes that result from this consultation will be reported through the Examination process. Undertaking SustA is an iterative process - amendments made at the request of the Secretary of State may result in the need to re-appraise elements of the SADPD against the SustA framework the changes are deemed significant.



## 6. CONCLUSION

- 6.1 Lambeth Council has prepared the SADPD PSV for consultation in early 2024. This consultation will invite representations on the soundness of the SADPD (under Regulation 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012).
- 6.2 Once adopted, the SADPD 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.
- 6.3 The SADPD PSV includes site allocation policies for thirteen 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 site allocation policies is design-led optimisation of development capacity, as required by London Plan policy.
- 6.4 Sites are included in the SADPD PSV 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.

- 6.5 This report has provided an appraisal of the reasonable alternatives for the proposed thirteen site allocations, and an appraisal of the site allocation policies set out in the SADPD PSV. Where substantial amendments have been made following Reg 18, the amended version of the allocation has also been considered against earlier iterations. Overall, the appraisal has concluded that the site allocation policies comprehensively address all components of sustainable placemaking 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.
- 6.6 As discussed at para 2.11, this SustA integrates the principles of the EqIA into the SustA Framework. Overall, the scoring of EqIA related objectives are positive. The proposed policies in the SADPD PSV are expected to have a net positive impact on groups with protected characteristics, particularly those within more disadvantaged socio-economic groups, Black, Asian and Minority Ethnic, disabled people and younger and older people. It should be noted that the Council will have a further opportunity to consider the equalities impacts (whether positive, negative or neutral) of specific development proposals at the planning application stage.
- 6.7 No significant adverse health impacts have been identified through the screening process incorporated into this SustA, therefore a full Health Impact Assessment has not been undertaken. Several of the site allocations included in the SADPD PSV (e.g. SA2, SA7, SA17, and SA24) include existing health and clinical related uses. The application stage will provide a further opportunity to consider the impact of development on any of these sites.
- 6.8 The HRA screening assessment of the SADPD PSV has not identified any likely significant effects or impacts on the integrity of any European Site.
- 6.9 It will be important for infrastructure to keep pace with population growth. Local Plan policies provide a good basis for identifying and delivering 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 SADPD PSV (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.

- 6.10 The SADPD 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 SADPD PSV include specific reference to Local Plan policies for e.g.S2 (new or improved social infrastructure). Comments from the GLA, Environment Agency, and other stakeholders received at Reg 18 have also been taken into consideration, with further detailed requirements on matters including biodiversity, flood risk, surface water, to transport, inclusive environments incorporated into the policy text of the SADPD PSV.