LB Lambeth: Site Allocations Development Plan Document

Sustainability Appraisal Adoption Statement

September 2026

1. Introduction

1.1 Purpose of the SA Adoption Statement

This Sustainability Appraisal (SA) Adoption Statement has been prepared to accompany the adoption of the London Borough of Lambeth's Site Allocations Development Plan Document (SADPD).

It fulfils the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations), which require local planning authorities to publish a statement setting out how environmental and sustainability considerations have been integrated into the plan-making process.

The purpose of this statement is to:

- Explain how environmental, social and economic considerations have informed the preparation of the SADPD;
- Summarise how the SA process has been carried out;
- Describe the reasons for selecting the adopted approach in light of reasonable alternatives;
- Outline how consultation responses have been taken into account; and
- Set out the measures that will be used to monitor the significant effects of implementing the SADPD.

1.2 Legislative and policy context

The SA including the SA Scoping Report and addendums have been prepared in line with the requirements of the Planning and Compulsory Purchase Act 2004, as well as the detailed requirements set out under the Environmental Assessment of Plans and Programmes Regulations 2004. These incorporate the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC), as transposed into UK law through the SEA Regulations.

The SA is also aligned with national policy requirements for plan-making, as set out in the National Planning Policy Framework (NPPF), which require local plans to contribute to the achievement of sustainable development.

The SA is an iterative process that has informed the development of the SADPD throughout its preparation. It considers the likely significant effects of the plan and reasonable alternatives, taking into account environmental, social and economic objectives.

1.3 The relationship of the SADPD to the development plan

Once adopted, the SADPD will form part of the Development Plan for Lambeth, which includes the Lambeth Local Plan (LLP), the South Bank and Waterloo Neighbourhood Plan, the Kennington and Oval Neighbourhood Plan, as well as the London Plan.

The SADPD identifies specific sites for development, setting out the type and scale of development and key principles for their future use. The SA has played a key role in informing the refinement of site allocations, ensuring that the SADPD supports sustainable growth across the borough. The SA does not appraise existing policies within the adopted Lambeth Local Plan, though these are taken into account when considering the likely impact and potential mitigation of environmental effects that development may give rise to.

This Adoption Statement draws on the suite of SA documents prepared alongside the SADPD, including the Scoping Report, the main SA Report, the two SA Addenda and Non-Technical Summary, alongside the council's response to the Inspector's Matters, Issues and Questions, and the Inspector's Report.

2. Summary of the SA process

2.1 Overview of the SA methodology

The SA process has been undertaken in accordance with statutory requirements and guidance. It provides a systematic framework for assessing the likely significant effects of the SADPD and other reasonable alternatives on the environment.

The process involved:

- Establishing a baseline of environmental, social and economic conditions in Lambeth;
- Identifying key sustainability issues and objectives;
- Developing an appraisal framework to assess the performance of site allocations;
- Assessing the likely effects of the SADPD alongside alternative options; and
- Recommending mitigation measures and monitoring indicators.

The SA has been carried out iteratively, informing plan development at each stage and ensuring that sustainability considerations were embedded within decision-making.

2.2 Stages of the SA process

The SA for the SADPD has been undertaken in several key stages:

- ***Scoping Stage***: The SA Scoping Report established the baseline conditions, sustainability objectives, and appraisal framework. This was subject to consultation with statutory consultees.
- ***Appraisal Stage***: The main SA Report assessed draft site allocations and reasonable alternatives, identifying potential significant effects and mitigation measures. This was made available for comment during the Regulation 18 consultation on the SADPD.
- ***Publication Stage (Regulation 19)***: The SA was updated to reflect the submission version of the SADPD. The SA was made available for comment during the Regulation 19 consultation.
- ***Non-Technical Summary***: A Non-Technical Summary was produced to provide a clear and accessible overview of the SA findings.
- ***Post-Submission Addenda***: Two SA Addenda were prepared to assess the modifications made suggested ahead of examination, and those further changes made in response to the examination hearings.

2.3 Key SA Documents

The SA process is documented through a series of reports that together provide a comprehensive record of the appraisal. These documents are available in the SADPD examination library on the council's website:

- *Sustainability Appraisal Scoping Report* – setting out the baseline, key issues, and the proposed SA framework, taking into account the recommendations of statutory consultees;
- *Sustainability Appraisal Report* – detailing the appraisal of the SADPD and reasonable alternatives. An initial *Sustainability Appraisal for the Regulation 18 draft version of the SADPD* was published in 2022. This was followed by an updated version of the *Sustainability Appraisal for the Regulation 19 Proposed Submission Version of the SADPD* was published in 2024;
- *Sustainability Appraisal Non-Technical Summary* – providing a concise summary of the SA process and findings.
- *SA Addendum* - assessing updates and modifications made in response to the Regulation 19 consultation, prior to the examination hearings;
- *Clarification on the Reasonable Alternatives paper* - this was produced in response to matters raised during the examination hearings.
- *Post-hearings addendum to the SA and HRA* - assessing updates and modifications made to the SADPD following the examination hearings.

3. How environmental and sustainability considerations were integrated

3.1 Key sustainability issues identified

The SA Scoping Report identified a range of environmental, social and economic issues relevant to Lambeth. This gathered baseline data on the borough, alongside an overview of the policy and regulatory context of the local, regional and national level. Key issues included the need to deliver high-quality housing, new and improved employment space, respond to climate change, improve air quality, reduce inequalities, and protect and enhance biodiversity and open space.

These issues informed the development of the Sustainability Appraisal Framework, which comprises a set of objectives and decision-making criteria used to assess the performance of the SADPD's policies and any reasonable alternatives.

3.2 The SA framework

The SA Framework provided a consistent basis for appraising site allocations and reasonable alternatives. It reflects the three dimensions of sustainable development (environmental, social and economic) and includes 18 objectives relating to topics that included health and wellbeing, housing, economy, sustainable transport, climate mitigation and adaptation, and environmental protection.

The SA framework follows the approach developed for the SA of the LLP in 2021. The Inspector considered this was appropriate, given the SADPD is intended to supplement and update the existing site allocation policies within the LLP.

Each site allocation was assessed against this framework to identify likely significant positive and negative effects, as well as opportunities for mitigation and enhancement.

3.3 Influence of the SA on the SADPD

The findings of the SA were used iteratively to inform the preparation of the SADPD, assessing different options and decisions such as:

- Refining site allocation boundaries and capacities;
- Informing development principles and site requirements;
- Identifying mitigation measures to address potential adverse effects; and
- Supporting a balanced approach to managing change in the built environment that reflects sustainability objectives.

The SA process ensured that sustainability considerations were embedded within decision-making and that the SADPD promotes sustainable development across the borough.

4. Reasonable alternatives considered

4.1 Approach to alternatives

In line with the SEA Regulations, the SA compared the likely significant effects of the SADPD against a range of reasonable alternatives. Alternatives were identified during the plan-making process, these included different site priorities and mixes of land uses.

The proposed alternatives were limited to those considered to be achievable and implementable within the context of planning policy and the remit of the council.

Paragraph 4.5 of the SA explains the council's reasoning for including sites within the SADPD. Further details on this process are set out in the council's Clarification paper on the selection of reasonable alternatives, this was produced in response to matters raised during the Examination Hearings.

4.2 Assessment of alternatives

Each reasonable alternative was appraised against the SA Framework to assess its performance against the 18 objectives. The level of detail provided is considered proportionate to the type of plan being prepared, while still enabling a meaningful comparison.

The process enabled an appraisal and comparison of the different options, based on their likely environmental, social and economic effects.

The appraisal identified both positive and negative effects, including cumulative and synergistic impacts where relevant.

The preferred site allocations included in the SADPD were selected taking into account the findings of the SA alongside other planning considerations, such as deliverability, viability, and policy conformity.

The reasonable alternatives were also revisited following Reg 18 consultation, taking into account the refinements to the design evidence, indicative modelling and policy text. This ensured that key revisions, such as site amended site boundaries and development quanta, had properly been considered and appraised alongside earlier alternatives.

This demonstrates a thorough and proportionate approach to the consideration of alternatives, in line with the statutory requirements for environmental assessment.

5. Consultation and responses

5.1 Consultation process

The SA was subject to consultation alongside the SADPD at key stages of plan preparation, including during the preparation of the Scoping Report, Regulation 18 (early engagement) and Regulation 19 (publication stage).

5.2 Engagement with statutory consultees

Statutory consultees, including the Environment Agency (EA), Historic England (HE) and Natural England (NE), were invited to comment on the Scoping Report and subsequent SA documents. Their input helped to refine the SA Framework and assessment methodology. Their comments and Lambeth's response is set out under appendix 3 of the Scoping Report (this is available in the SADPD examination library).

The EA and HE also provided detailed comments at Reg 18 and Reg 19 regarding the SADPD which helped refine the policy text of the SADPD, though no further comments were raised on the SA process in those representations.

5.3 Summary of Regulation18 and Regulation 19 consultations

Consultation responses covered a range of issues, including the consideration of alternatives and the identification of environmental impacts such as air quality, heritage and climate change. Some respondents raised concerns regarding amenity and environmental effects associated with particular allocations, including the impacts of tall buildings, embodied carbon, and opportunities for retrofit and reuse of existing buildings.

Although these comments were primarily based on the planning merits of individual site allocation policies rather than the Sustainability Appraisal process and findings, they related to matters that had been considered through the SA process.

5.4 How responses were taken into account

The Regulation 22 Consultation Statement provides details of the key issues raised during the consultation process and sets out the council's response. Comments received during consultation were taken into account in updating the SA and the SADPD. This included:

- Reviewing the SA assessments;
- Refining the site allocation policies;

- Ensuring appropriate mitigation measures were identified; and
- Providing additional clarity in SA reporting.

The SA Addendum captures how changes made at later stages, including post-submission modifications, were assessed and incorporated.

6. Assessment of changes made following examination

6.1 Main Modifications arising from the examination hearings

The Main Modifications were identified through the examination process to ensure the soundness and legal compliance of the SADPD. These modifications reflect a combination of Inspector recommendations, consultation responses, and ongoing assessment, including the findings of the SA.

6.2 Implications of Main Modifications on the SA

The sustainability implications of the Main Modifications were assessed through the two SA Addenda. These assessments considered whether the modifications would give rise to any new or materially different significant effects compared to those identified in the main SA Report.

The assessment concluded that the Main Modifications do not introduce any new significant adverse effects. In some cases, the modifications help to strengthen mitigation measures and improve the overall sustainability performance of the plan. This confirms that the findings of the original SA remain valid.

This ensured that all material updates to the SADPD were subject to appropriate appraisal in accordance with the SEA Regulations.

The approach is verified at para 41 of the Inspector's Report, "*the Inspector concluded that considered against the SADPD as a whole, the MMs are not considered to lead to any significant effects that have not already been identified*."

Therefore, it is concluded that no new significant effects have been identified, and no additional mitigation is required. Therefore, the earlier conclusions of the SA Report remain valid.

7. Conclusions of the SA

7.1 Overall assessment of effects

The Sustainability Appraisal assessed reasonable alternatives for all thirteen site allocations and the associated site allocation policies. Overall, it concluded that the allocations and policies support the delivery of sustainable development by promoting housing growth, place-making, infrastructure provision and environmental improvements, while addressing the specific characteristics and constraints of individual sites.

The SA identifies a range of positive effects, including supporting promoting development in sustainable and accessible locations, delivering new housing including affordable housing, improving access to services, delivering new and improved employment space, while also enhancing the environment and delivering placemaking opportunities through site-specific design principles.

The SA identified potential adverse effects relating to localised impacts on amenity, impact of construction and development on existing services, and additional pressure on infrastructure capacity and local amenities. However, these were considered to be either temporary, or able to be mitigated sufficiently through the application of development management policies and other regulatory controls, through the planning application process.

With mitigation in place, the majority of adverse effects are expected to be reduced to acceptable levels.

7.2 Inspectors comments on the SA

The Inspector's Report for the Examination of the SADPD is supportive of the council's approach to the SA. Para 4.1 states:

"Production of the SA has been in-step with the various stages of plan-making and has included an assessment of and consultation on, recommended MMs. As modified, the SADPD would contribute positively to Lambeth's sustainable development goals. Considered against the SADPD as a whole, the MMs are not considered to lead to any significant effects that have not already been identified. Therefore, the SADPD is considered to contribute toward sustainable development, and no additional mitigation beyond that already identified is required. It follows that the SA has been a genuinely iterative process. Overall, therefore, I am satisfied that the SA processes have been adequate and the legal requirements of the 2004 Act have been met in regard to the SA.

8. Monitoring measures

8.1 Monitoring framework

The SEA Regulations require the significant effects of implementing the plan to be monitored. Monitoring will help to identify any unforeseen adverse effects and enable appropriate remedial action to be taken.

As stated at para 1.24 of the SADPD, progress with implementation of the site allocations will be reported in the council's annual Authority Monitoring (AMR).

8.2 Indicators and targets

The monitoring framework for the LLP includes 29 indicators which relate to a range of matters including housing, affordable housing, commercial floorspace, heritage assets, biodiversity, open space, urban greening and carbon dioxide emission reductions, plus a commitment to report annually on developer contributions and air quality.

8.3 Reporting and review

Monitoring results will be reported on an annual basis through the AMR. This will enable the council to assess whether the SADPD is delivering its intended outcomes and to identify any need for corrective action or future policy review.

9. Next steps

9.1 Adoption of the SADPD

This Adoption Statement is published alongside the adopted SADPD in accordance with the SEA Regulations. It marks the conclusion of the plan-making and examination process.

9.2 Implementation and monitoring

Following adoption, the focus will shift to implementation. The site allocations and associated development principles will guide planning decisions and investment across the borough.

The monitoring framework set out in this statement will be used to track the effects of the SADPD over time.

9.3 Future review of the Site Allocations

The SADPD will be reviewed as part of the ongoing monitoring of the Local Plan to ensure it remains up to date and effective. The findings of monitoring and any changes in baseline conditions or policy context will inform future updates, with the review of the Lambeth Local Plan beginning in summer 2026 under the Government's new plan making system. This will provide an opportunity to review all local plan policies and may incorporate a review of all site allocations.

10. Conclusion

The SA process has been undertaken in accordance with all relevant legislative requirements and best practice guidance.

It has been applied consistently and iteratively throughout the preparation, consultation, examination and finalisation of the SADPD, ensuring that environmental, social and economic considerations have been fully integrated into decision-making at each stage.

The evidence set out in this Adoption Statement demonstrates that the SA has been robust, transparent and proportionate, with reasonable alternatives assessed and consultation responses appropriately taken into account. Monitoring and review of the site allocation policies has been sufficiently considered.

Overall, it is concluded that the required process has been followed correctly, and that the SADPD is supported by a sound and legally compliant SA, as endorsed by the Planning Inspector's Report on the SADPD.