



Lambeth
Planning

Lambeth Annual Monitoring Report 1st April 2004 to 31st March 2005

Lambeth Annual Monitoring Report 2004/2005

Contents

	<u>PAGE</u>
1 Introduction	1
1.1 Assessment of Local Development Documents	1
1.2 Implementation of the Local Development Scheme	2
1.3 Introducing the Annual Monitoring Report	2
1.4 Issues for the 2005 Annual Monitoring Report	2
2 Introducing Lambeth	5
2.1 Contextual Indicators	5
2.2 Significant Effects Indicators	11
3 Housing	13
3.1 Housing Provision	13
3.2 Housing on Previously Developed Land	15
3.3 Housing Density	15
3.4 Affordable Housing	16
4 Employment	19
4.1 Employment Land	19
4.2 Employment Development	21
4.3 Location of Major Office Development	23
5 Retail, Leisure and Town Centres	25
5.1 Retail and Leisure Development	25
5.2 Town Centres	27
5.3 Vacancy Levels	28
6 Transport	31
6.1 Car Parking	31
6.2 Public Transport Accessibility	32
7 Natural Environment	35
7.1 Open Space	35
7.2 Biodiversity	36
8 Environmental Resources	39
8.1 Water Quality	39
8.2 Flood Protection	39
8.3 Renewable Energy	40
8.4 Minerals	41
9 Waste	43
9.1 Management Methods for Waste	43
9.2 Availability of Sites and Facilities for Waste Management	44
10 Implementation of the Local Development Scheme	47
10.1 Replacement Unitary Development Plan	47
10.2 Statement of Community Involvement and AMR	47
10.3 Adoption of Development Plan Documents	47
10.4 Saved Policies	47
10.5 Local Development Scheme (December 2005)	47
11 Conclusion	49
Appendix 1 – Core Output Indicators	51

Section 1 - Introduction

This is the London Borough of Lambeth's first Annual Monitoring Report and it is for the period 1st April 2004 to 31st March 2005.

The Planning and Compulsory Purchase Act 2004 requires Lambeth to complete an Annual Monitoring Report, for the previous financial year, which must be submitted to the Secretary of State by the 31st of December of the following financial year.

The Annual Monitoring Report must contain information on:

- The extent to which the policies set out in Local Development Documents are being achieved; and
- The implementation of the Local Development Scheme.

1.1 Assessment of Local Development Documents

The Local Development Documents which contain policies to be monitored are the:

- Adopted Unitary Development Plan (1998); and the
- Replacement Unitary Development Plan - Revised Deposit Draft (2004).

The Adopted UDP is the current 'saved plan' under the transitional provisions of the Planning and Compulsory Purchase Act 2004. It is therefore the Plan that should be monitored in this Report. However since the Deposit Draft of the Replacement UDP was placed on consultation in January 2002 the Council has been applying the policies in both the Adopted UDP and the Replacement UDP. The weight given to the different UDPs has depended on the circumstances in each particular case where the policies are being applied. The policies in the Replacement UDP have been particularly important where they reflect changing national and regional policy in a way that the Adopted UDP policies do not.

It is also important to note that it is the Replacement UDP policies that will have full weight in the future, and the Adopted UDP policies will no longer be used. The Public Local Inquiry for the Replacement UDP was held from March to May 2005 and the Inspectors Report is expected in February 2006, anticipated adoption is by the end of 2006. A key part of monitoring is comparing trends over time. If the focus of this Annual Monitoring Report was solely on the Adopted UDP policies then future Annual Monitoring Reports would not be able to be compared so effectively. It would also not be an accurate reflection of the Adopted UDP policies since the policies in the Replacement UDP are also being applied.

Therefore the approach taken in this Annual Monitoring Report is to look at monitoring in relation to the key themes that both plans cover. These themes are as follows:

- Housing
- Employment
- Retail and Leisure and Town Centres
- Transport
- Natural Environment
- Environmental Resources
- Waste

Reference is made to the relevant policies from both the Adopted and Replacement UDP in relation to each theme. In this way the impact of both UDPs can be assessed and a clear approach that allows for the future assessment of trends will be set down.

These themes also relate to the Lambeth Community Strategy 2004-2015, which sets out the long-term vision and action plan for Lambeth, designed to promote the social, economic and environmental sustainability of the borough. The Adopted and Replacement UDPs act as a land-use delivery mechanism for the Community Strategy and therefore the indicators in this Annual Monitoring Report relate to the Council's vision for Lambeth.

1.2 Implementation of the Local Development Scheme

The Council produced its first Local Development Scheme in March 2005 and this Annual Monitoring Report will assess the implementation of the Local Development Scheme between April 2004 and March 2005.

1.3 Introducing the Annual Monitoring Report

Following on from this Introductory Section the second section 'Introducing Lambeth' sets out key demographic and socio-economic characteristics of the London Borough of Lambeth. This is done through the use of a set of Contextual Indicators, which provide a backdrop against which to consider the effects of the policies in the Adopted and Replacement UDPs. The issue of Significant Effects Indicators is also addressed in this section.

Sections 3 to 9 relate to each of the themes set out above. In each of these sections a set of Core Output Indicators and in some cases Local Output Indicators are set out relating to a particular theme e.g. Housing. The main purpose of output indicators is to measure quantifiable physical activities that are directly related to, and are a consequence of, the implementation of planning policies.

Core Output Indicators are those that Lambeth is expected to monitor by the ODPM publication 'Local Development Monitoring: A Good Practice Guide' (set out in Local Development Framework Core Output Indicators – Update 1/2005). One of the key Core Output Indicators relates to housing provision and includes the development of a housing trajectory. This is dealt with in Chapter 3 – Housing. Local Output Indicators address policies not already covered by the Core Output Indicators. In relation to each of these indicators an Objectives-Policies-Targets-Indicators approach is taken. This means that in relation to each indicator there is a clear set of objectives, policies and targets that relate to the indicator.

Following on from the sections on policy themes section 10 assesses the implementation of the Local Development Scheme and section 11 pulls together some key conclusions from this Annual Monitoring Report.

1.4 Issues for the 2005 Annual Monitoring Report

This is Lambeth's first Annual Monitoring Report and as such a number of challenges have arisen during its production. In future Annual Monitoring Reports the Council will seek to monitor all Core Output Indicators but due to limited data availability that has not been possible in this Annual Monitoring Report. Appendix 1 sets out for each

Core Output Indicators whether it has been possible to monitor, partially monitor or not monitor them in this Annual Monitoring Report.

One of the key issues associated with monitoring for Lambeth is a lack of reliable historical completions data. The Council is now undertaking a project to improve the recording of completions. The Council will identify all housing and commercial developments within the development pipeline in a particular year. This will involve looking at planning permissions, developments approved subject to s106 Agreements, developments under construction, completions and any identified sites with development potential. Initially this will involve looking back retrospectively to bring the data Lambeth currently has up-to-date. Once this has been completed an ongoing system would be set up to ensure that the monitoring information required for Annual Monitoring reports will continue to be available.

In addition to improving the recording of completion the Council will consider Best Practice AMR work completed by other local authorities. In future years this should allow more detailed monitoring information to be incorporated in the Annual Monitoring Report.

Section 2 - Introducing Lambeth

2.1 Contextual Indicators

This section sets out Lambeth's contextual indicators for the Annual Monitoring Report. These aim to provide measurable information to give a sense of the particular nature of the borough of Lambeth and so inform the meaning of the core, local output and significant effect indicators. In essence they aim give an overview of the Borough's character. The contextual indicators have been divided up into several categories or bundles of broad themes. Within these bundles data is presented for various selected topics. The bundles of indicators relate to Demographics and Socio-economic Issues.

2.1.1 Demographics

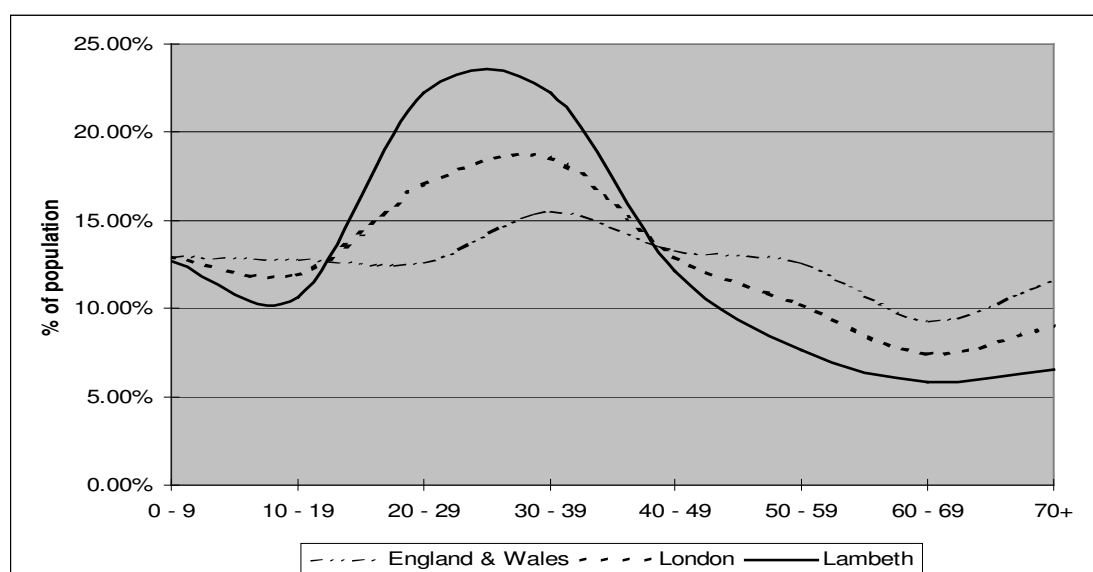
Lambeth is an incredibly diverse borough, a fact reflected in that 132 languages are spoken in it, this is reputed to be more than any other place in Europe. However within that diversity several broad themes can be observed.

Table 2.1: Population (2001 Census, National Statistics Online)

	1981	1991	2001	%Change 1991-2001
Lambeth	252,925	244,834	266,170	8.7%
Inner London	2,550,139	2,504,143	2,765,975	9.5%
Greater London	6,805,565	6,679,455	7,172,036	6.9%
England	45,771,956	47,055,204	49,138,831	4.4%

As can be seen from Table 2.1 the population of Lambeth has grown at twice the rate of England as a whole. The slightly lower growth rate than the Inner London average can be put down to Lambeth's extremely high density of population (see Table 4). Lambeth remains the Inner London borough with the highest resident population.

Table 2.2: Age range of Lambeth in 2001 (2001 Census, National Statistics Online)



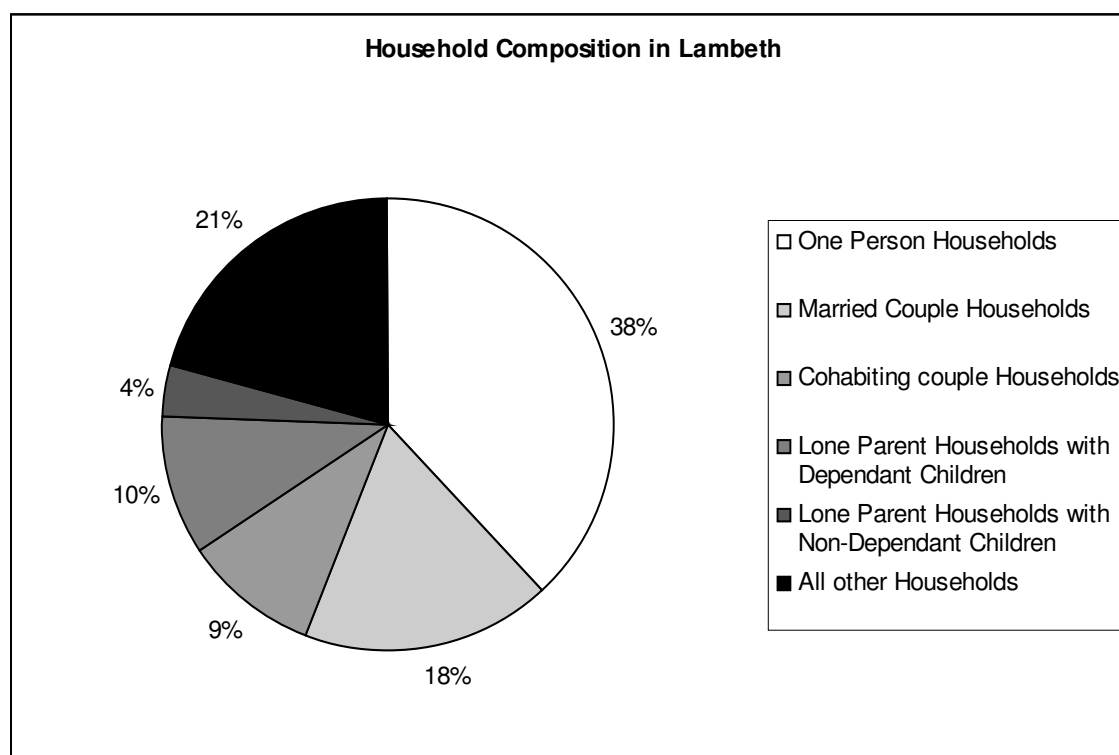
As can be seen from the graph overleaf whilst Lambeth reflects the general population age trends of London and England its extremes are far greater, with a very high proportion of young adults and a very low proportion of the over 60's. London has a young age profile compared with the whole country and Lambeth is young within that. In Lambeth, almost half (45%) of the population is between 20 and 40. This compares with 35.6% for London and 28.3% nationally.

Table 2.3: Number of Households (2001 Census, National Statistics Online)

	All households with residents			% of households with residents			
				Detached/ semi-detached/ terraced		Purpose-built flats/ conversions	
	1991	2001	& change	1991	2001	1991	2001
Lambeth	108,920	118,447	8.7	28.9	28.6	66.6	69.7
Inner London	1,096,141	1,219,859	11.3	28.7	29.0	67.1	68.9
Greater London	2,763,166	3,015,997	9.2	52.0	51.0	45.2	46.9
England	19,670,982	20,451,427	4.0	79.9	79.9	18.3	18.6

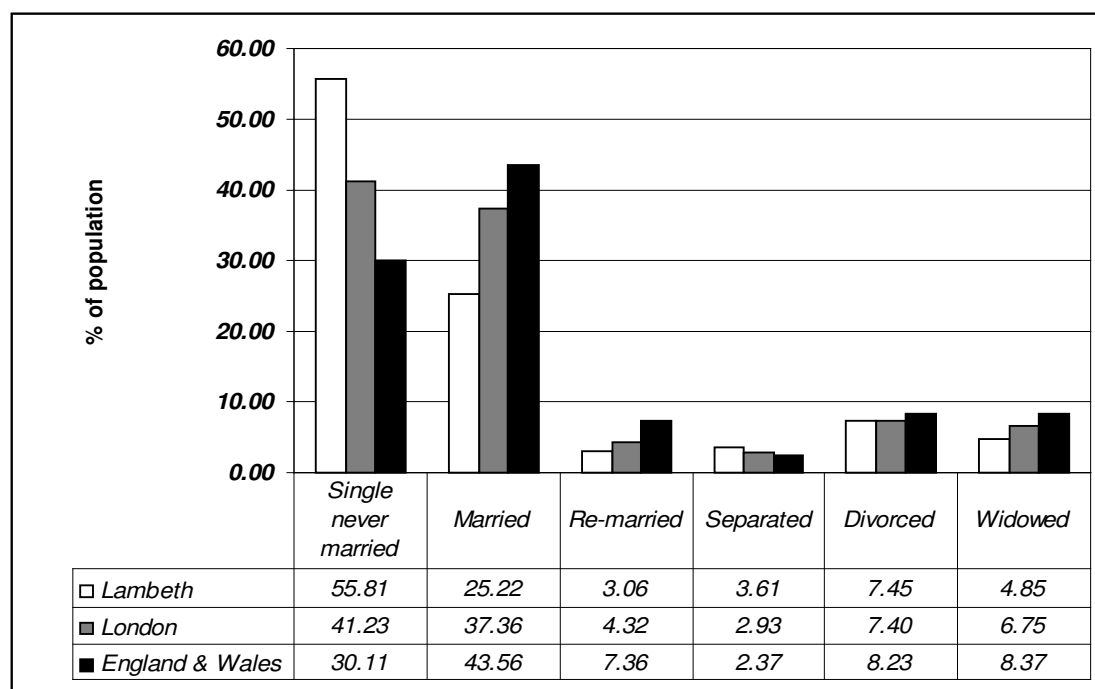
It is interesting to note that the number of households has increased in Lambeth by exactly the same proportion as the population has increased 8.7%. The majority of new households since 1991 live in flats or house conversions, with nearly 70% of all households now living in flats. This compares to 18.6% for population as a whole in England.

Table 2.4: Household Composition (2001 Census, National Statistics Online)



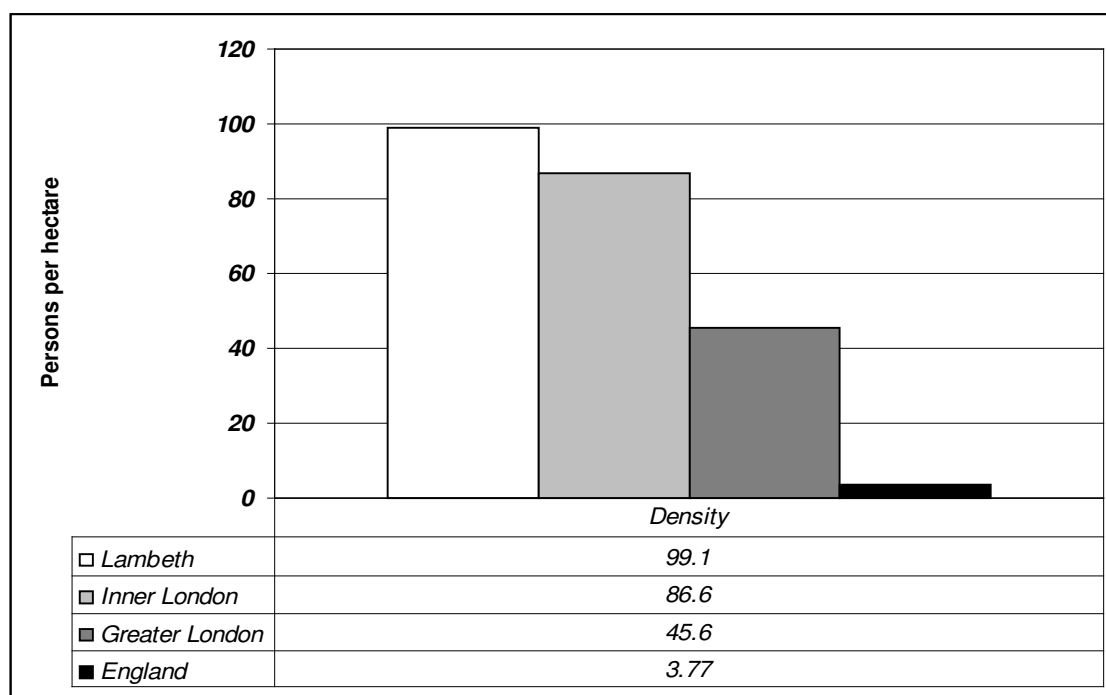
Single person households account for the largest category of households within Lambeth (See Table 6) at 38%. The national average is 30%. This is a reflection in part of the high number of single people living in the borough and has a strong influence on the accommodation needs of people in the borough.

Table 2.5: Marital Status (2001 Census, National Statistics Online)



Lambeth has highest percentage of single people in the country – 55.8% of all Lambeth residents define themselves as single.

Table 2.6: Population density (2001 Census, National Statistics Online)



Lambeth is one of the most densely populated places in the UK. Lambeth has an area of 2,682 hectares and a population of density of 99.1 people per hectare. This is the 5th highest in the country, compared with the overall English density of 3.77 people per hectare.

Table 2.7: Ethnicity (2001 Census, National Statistics Online)

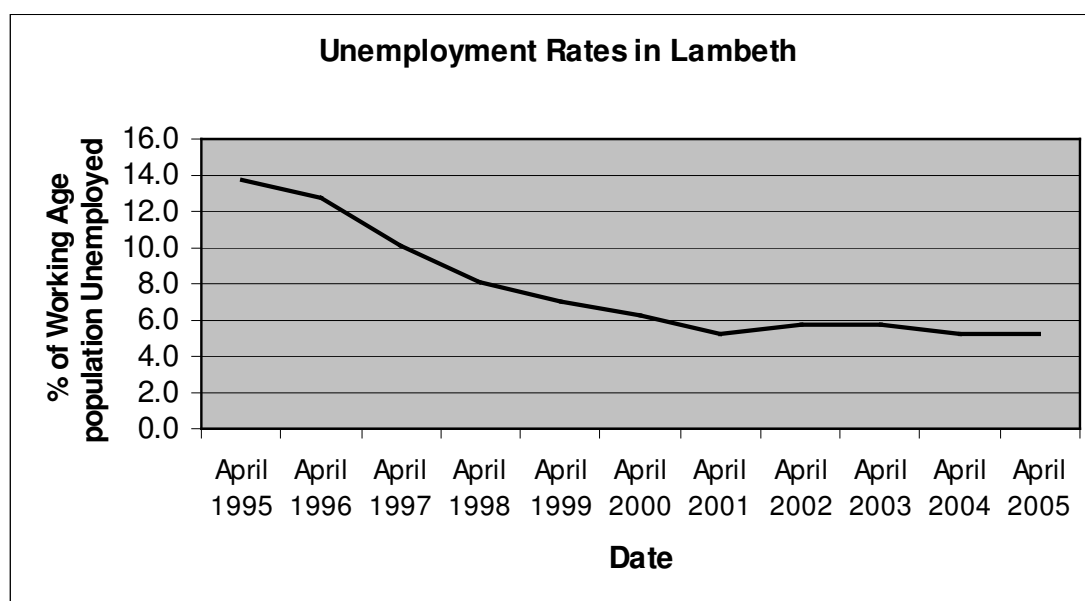
			% of population			
		Lambeth Population	Lambeth	Inner London	Greater London	England
White	British	131,939	46.6	50.5	59.8	87.0
	Irish	8,689	3.3	3.4	3.1	1.3
	Other White	25,430	9.6	11.8	8.3	2.7
	Total White	166,058	62.5%	65.7%	71.2%	91%
Black or Black British	Caribbean	32,139	12.1	6.9	4.8	1.1
	African	30,836	11.6	8.3	5.3	1.0
	Other Black	5,579	2.1	1.3	0.8	0.2
	Total Black	68,554	25.8%	16.5%	10.9%	2.3%
Asian or Asian British	Indian	5,316	2.0	3.1	6.1	2.1
	Pakistani	2,634	1.0	1.6	2.0	1.4
	Bangladeshi	2,169	0.8	4.6	2.1	0.6
	Other Asian	2,045	0.8	1.3	1.9	0.5
	Total Asian	12,164	4.6%	10.6%	12.1%	4.6%
Mixed	White and Black Caribbean	5,322	2.0	1.3	1.0	0.5
	White and Black African	2,159	0.8	0.7	0.5	0.2
	White and Asian	2,100	0.8	0.9	0.8	0.4
	Other Mixed	2,273	1.2	1.1	0.9	0.3
	Total Mixed	12,854	4.8%	4.04%	3.23%	1.4%
Chinese other	Chinese	3,362	1.3	1.4	1.1	0.4
	Other	3,177	1.2	2.0	1.6	0.4
	Total Chinese/other	44,478	2.5%	3.4%	2.7%	0.8%

Lambeth is an extremely diverse borough. 50.4% of the population consider themselves to come from groups other than White British. This is compared to 87% of the population as a whole of England. Black groups total 25.8% in Lambeth, compared to 16.5% in Inner London and 10.9% in Greater London.

2.1.2 Socio-economic Issues

Lambeth has a reputation as a high unemployment, high crime and low income borough and whilst there is some truth in this stereotype in some parts of the borough a more complex and changing situation is shown in the following tables.

Table 2.8: Unemployment rates in Lambeth (from NOMIS monthly figures)



As can be seen from Table 8 unemployment in Lambeth has more than halved over the past 10 years, from 13.8% of the working age population to 5.2%. Whilst this reflects overall national trends, the fall is much greater than average, the current national unemployment rate is 4.7%.

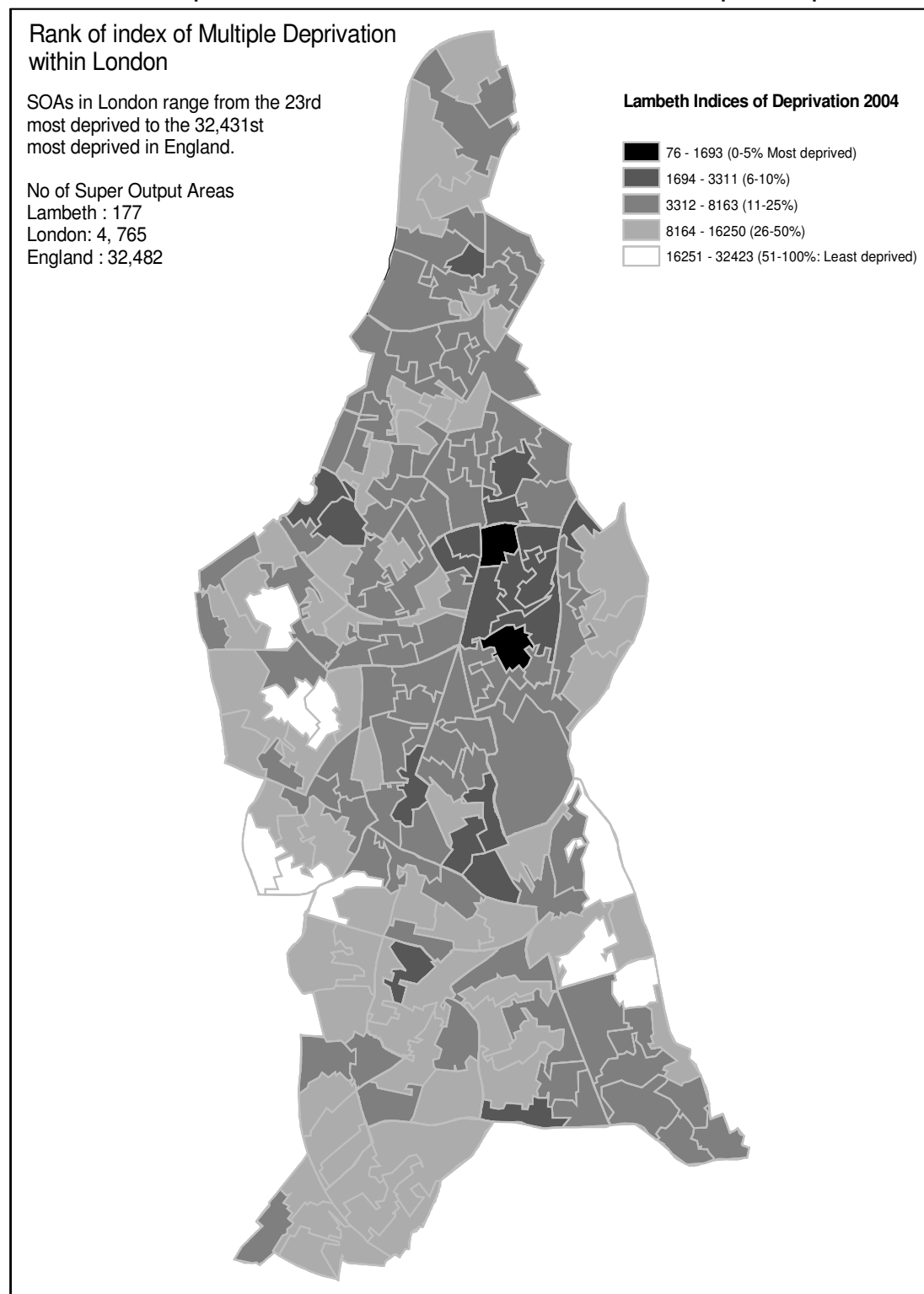
Table 2.9: Crime Rates (Metropolitan Police)

Borough	FY2001-2	FY2002-3	FY2003-4	Change from FY2001-2 to FY2003-4	% Change
Westminster	86,270	86,151	79,296	-6974	-8%
Camden	53,103	53,890	51,016	-2087	-4%
Lambeth	57,092	54,188	49,937	-7155	-12.50%
Southwark	45,707	45,960	46,276	569	1.20%
Hackney	39,769	39,267	39,035	-734	-1.80%
Newham	40,616	41,157	40,615	-1	0
Islington	37,611	39,425	40,816	3205	8.50%
Tower Hamlets	37,273	41,124	39,188	1915	5%
London Total	397,441	401,162	386,179	-11262	-2.8%

Table 2.9 shows the number of reported crimes in the Inner London Boroughs from the period 2001-2004. In this relative short time frame numbers of reported crimes in Lambeth, whilst still being relatively high, have fallen faster than in any other Inner London Borough.

Table 2.10: Map of Multiple Deprivation in Lambeth (Corporate Policy Unit, Lambeth)

Indices of Deprivation 2004: Rank of index of Multiple Deprivation



The national Index of Multiple Deprivation was published in 2004 and records data down to ward level. It is based on seven domain indexes: Income Deprivation, Employment Deprivation, Health Deprivation and Disability, Education, Skills and Training Deprivation, Barriers to Housing and Services, Living Environment Deprivation and Crime.

The most deprived areas are in black, the least deprived are in white. Lambeth clearly has a range of areas in the borough including some of the most deprived wards in the country located in the Brixton/Stockwell areas. But it also has areas of comparative wealth mostly located around the Clapham and Norwood Areas.

Table 2.11: Households with Cars and Vans (2001 Census, National Statistics Online)

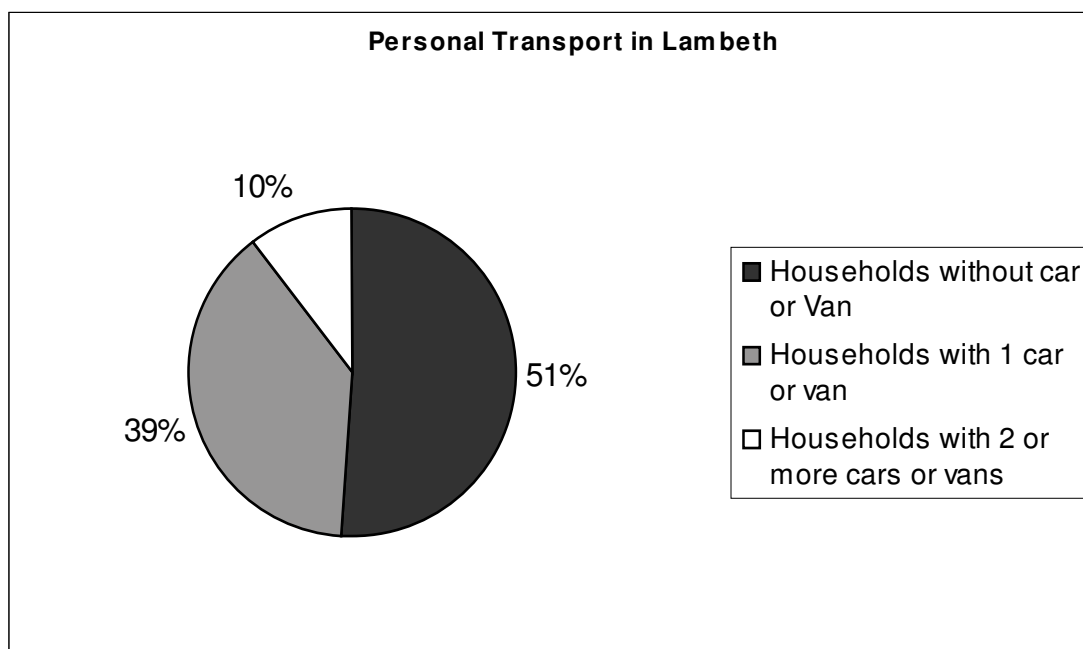


Table 2.11 shows high number of households without a car in the borough. 51% of households have no vehicles at all; this compares to 27% nationally. This reflects Lambeth's urban character and also places extra emphasis on the local authority ensuring that new developments are well located for transport links.

2.2 Significant Effects Indicators

Under the Strategic Environmental Assessment Directive, which is addressed under the planning system by Sustainability Appraisals, significant effects are required to be identified and monitored. A significant effect indicator is an indicator that measures the significant effects of a Local Development Document.

These are not addressed in the first Annual Monitoring Report as a Sustainability Appraisal has not been carried out on the Adopted or Replacement UDP, due to the recent introduction of this requirement. Future Local Development Documents that will be prepared for Lambeth will have a Sustainability Appraisal carried out and at that stage significant effects indicators will be included in Annual Monitoring Reports.

Section 3 - Housing

Providing housing is one of the most important issues facing Lambeth. Meeting the demand for housing is a priority and a key issue for planning policies. There is a need to balance the demand for housing, maintaining existing quality and character of areas and providing good quality homes and environment. Lambeth aims to meet the housing needs of the community as a whole by providing a choice of housing in terms of type, size and affordability.

Housing is addressed in Strategic Policies G2-G6 and Chapter 2 Housing in the Adopted UDP and in Strategic Policy D and Policies 15-8 in the Revised Deposit Replacement UDP.

The key focus for housing monitoring in this Annual Monitoring Report is on housing provision, housing density, affordable housing and conversions.

3.1 Housing Provision

The Lambeth Housing Provision Survey Report (2002) was used to inform the housing provision figures set out in Policy 15 of the Revised Deposit Replacement UDP. The total figure of 20,500 or 1367 annually (2002 to 2016) is significantly higher than the 7700 or 513 annually (1992-2006) set out in Policy H1 of the Adopted UDP.

The housing provision figures set out in the Revised Deposit Replacement UDP are different from those included in the London Plan as the Council does not accept the figures included in the London Plan. This matter was discussed at the Local Public Inquiry held from March to May 2005 and the GLA accepted that the figures included in the Revised Deposit Replacement UDP were likely to be more reliable than those in the London Plan, however this will be subject to the Inspector's Report which is due in February 2006.

Lambeth has provided information on sites to the GLA Housing Capacity Study 2004, the purpose of which is to alter the housing provision figures in the London Plan. The proposed Draft Alterations update to the London Plan was published for consultation in October 2005. This has a housing provision target for Lambeth of 11,950 from 2007-2017, which is an annual provision figure of 1195. These capacity estimates are still under discussion with the GLA as the Council has concerns about the methods used in part of the Housing Capacity Study.

In 2004 the Council carried out a project into housing completions for the period 1997-2003/2004. From 2004/2005 the Council has submitted information on housing permissions, starts and completions to the London Development Database.

OBJECTIVE: To increase the level of housing provision.

Strategic Policies: **G24 and Strategic Policy D**
Policies: **H1 and Policy 15**

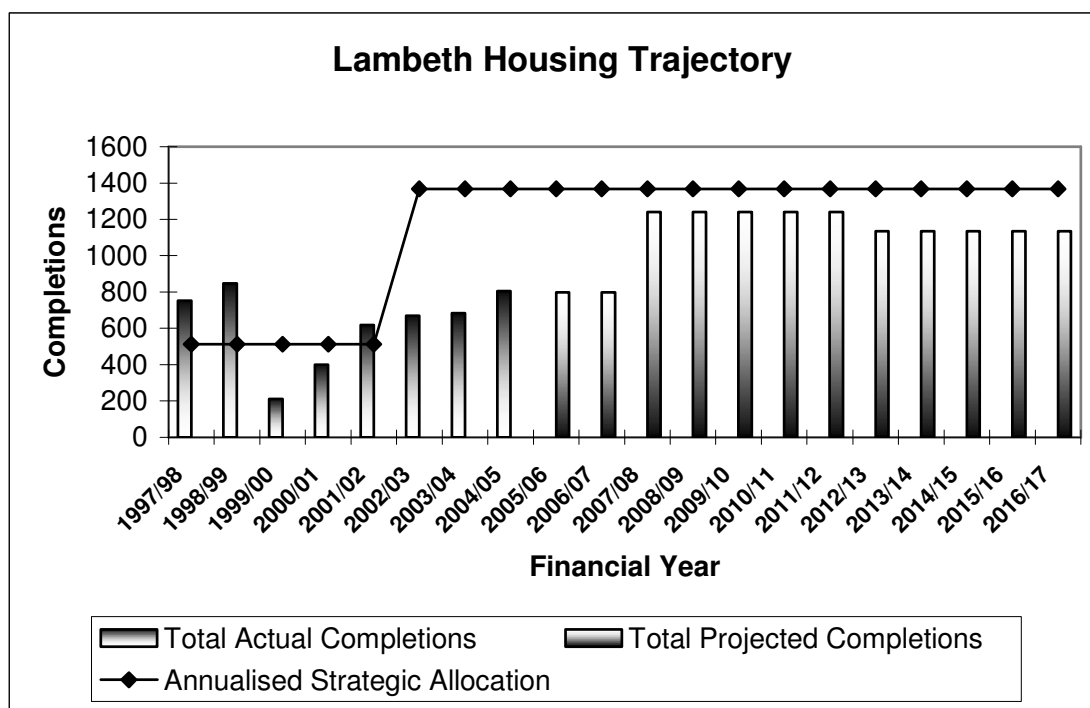
Target 3A

1992-2001 - The Council will make provision for 7,700 (513 annually) additional dwellings in the Borough during the period 1992-2006.

2002- 2016 - A minimum of 20,500 (1367 annually) net additional dwelling completions between 2002 and 2016.

Indicator 3A (Core Output Indicator 2a)

The housing trajectory in Table 2.1 sets out the provision of housing between 1997/1998 to 2004/2005. The figures from 1997/1998 to 2003/2004 are from the Council's housing completions project, which was carried out in 2004. The figure for 2004/2005 is from the London Development Database. The projection in the housing trajectory from 2005/2006 to 2016 is based on work done for the GLA Housing Capacity Study, taking into account the Council's concerns with the Study. The Graph also shows the Annualised Strategic Allocation as set in the Adopted UDP for the period 1997/1998 to 2001/2002 and from the Revised Deposit Replacement UDP for 2002/2003 to 2016/2017.

Table 3.1: Lambeth Housing Trajectory**Conclusion**

In terms of the Adopted UDP the annual target of 513 completions has been achieved in three of the five years (1997/1998 to 2001/2002) for which the Council has data. Over the five years as a whole the average completions figure is 566, which is above the target of 513 completions.

The figure of 1367 completions annually from 2002, as set out in the Revised Deposit Replacement UDP, has not been achieved, with numbers generally only half this level, according to the completions data currently available.

The Council believes there are a number of reasons why the annualised target in the Revised Deposit Replacement UDP is not being reached, but these fall into one of two main camps. This first of these camps relates to the data available. As set out in the Section 1 - Introduction of this AMR the Council needs to undertake more detailed work in relation to the monitoring of completions. The Council believes that as a result of this work the number of completions will increase.

The second key issues relates to the current strength of Policy 15 in the Revised Deposit Replacement UDP, and the status of the 20,500 completions target included in the policy. As Policy 15, and other relevant policies such as Policy 12 and Policy 32 which seek high-density development, are not yet adopted they do not have full weight when applied to planning applications. There has also been debate over the correct target figure to include in the Replacement UDP due to the London Plan figures and the Housing Capacity Study. In future years there will be more clarity on the status of the Replacement UDP target. The 'target' figure will also be at a lower more realistic level, as already indicated in the revised London Plan figures.

As a result of these matters the Council believes that it is likely that the current gap between actual completions and the annualised target will narrow as the annualised figure will be revised and level of completions should increase.

3.2 Housing on Previously Developed Land

OBJECTIVE: Provide all new housing on previously developed land
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Strategic Policies: **G7 and Strategic Policy C**

Policies: **Policy 6**

Target 3B

100% of new and converted dwellings to be provided on previously developed land.

Core Output Indicator 3B (Core Output Indicator 2b)

Lambeth is a dense and built up part of inner London. All new dwellings (100%) constructed are on previously developed sites. Existing open spaces are strongly protected against development.

Conclusion

Lambeth's policies, along with its locational and built characteristics, ensure that all new residential development is provided on previously developed land. It is expected that this trend will continue indefinitely.

3.3 Housing Density

With the publication of the Deposit Draft UDP in January 2002, the Council has moved towards a 'design led' approach, which recognises that different densities are appropriate to different contexts in the Borough. It enables the Council to be more flexible in its approach allowing much higher densities than was previously the case at locations well served by public transport. As a result the proportion of new dwellings completed at the higher range of density levels is growing.

OBJECTIVE: To encourage high density housing in appropriate locations.

Strategic Policies: **G5 and Strategic Policies C and K**

Policies: **H10, ST2 and Policy 32(C)**

Target 3C

To increase the density of housing provided in the borough through the use of the design led approach.

Indicator 3C (Core Output Indicator 2c)

Many high density housing schemes which have been negotiated with the Council since 2002 and subsequently been given permission have not yet been built. These have been design led developments, with flexibility shown to previous development standards. On sites within town centres, or in Central London locations, this has resulted in densities of between 650 and 1100 habitable rooms per hectare. It is anticipated that the percentage of new dwellings completed in the higher density range will start to grow as these permissions are converted into actual developments in the coming few years. In 2004-5, the latest phase of the St George's Wharf scheme at Vauxhall was completed at the higher end of this density range.

Conclusion

The drive to encourage high-density housing in appropriate locations, as set out in Policy 32 of the Revised Deposit Draft UDP, will only come fully into force when the Plan is adopted. The Council expects density levels in the future to increase as Policy 32 is fully implemented.

3.4 Affordable Housing

Since the publication of the Deposit Draft Replacement UDP in January 2002, the Council has been seeking the provision of 50% of habitable rooms in any housing development of fifteen (15) or more units to be for affordable housing, subject to financial viability. The Council's success at achieving this proportion has been growing, as the weight attached to the emerging UDP increases and with the advent of the London Plan which is seeking a similar ratio.

OBJECTIVE: To increase the provision of affordable housing.

Strategic Policies: **G2 and Strategic Policies D**

Policies: **H7 and Policy 16**

Target 3D

On developments of 15 or more units that 50% of habitable rooms are provided for affordable housing, assuming a public subsidy, or 40% of habitable rooms with no public subsidy.

Indicator 3D (Core Output Indicator 2d)

Generally speaking, provision of affordable housing at levels greater than 35% has become commonplace in Lambeth. In 2004, permission was given for a development at 214-238 Norwood Road with 50% provision (52 out of 103 dwellings), and for the redevelopment of the Haselrigge Primary School on Bowland Road, which achieved 47% (22 out of 47 dwellings). In early 2005 the redevelopment of the site at 30 Streatham Place was given permission at 45% (18 out of 40 dwellings). Construction of two of these developments has since commenced. In July 2005 Vauxhall Towers at Wandsworth Road was given permission at 37.3%.

It is anticipated in future years that the proportion of affordable housing secured from residential development will continue to rise if the UDP Inquiry Inspector's report (expected in February 2006) agrees with the Council's 50% affordable housing provision and the suggested threshold of ten (10) units and above.

Conclusion

Lambeth's current and emerging housing policies encourage the provision of affordable housing in private developments. The examples provided show that these policies are achieving this purpose, particularly with the increasing application of the emerging policy. The emerging policy requires a greater contribution of affordable units than the current policy, so provision of these units is expected to improve further in the coming years as the new policy is fully implemented.

Section 4 - Employment

The Lambeth economy is characterised by having a high proportion of Small to Medium Sized Enterprises (SMEs), and has a high business start-up rate. Lambeth also is home to a number of large multi-national firms, many of which have their headquarter offices in the north of the Borough, such Shell and P&O in Waterloo. Maintaining a core amount of employment land, distributed evenly throughout the Borough, and providing for the full range of business types, sizes, and costs to meet the needs of different sectors of the economy is a very important component of a 'mix' of land uses that can lead to healthy and sustainable communities.

The aims of the UDP policies are threefold: to safeguard the Borough's prime employment land; to support and promote large scale office development in locations most accessible by public transport; and, to secure a distribution of employment development throughout the Borough, so that it is accessible to all residents. The best employment land in the Borough is designated within 'Key Industrial and Business Areas' (KIBAs) under the Revised Deposit UDP. These are the Boroughs strategic reservoirs of employment land, and provide an important contribution to meeting demand in key sectors which are competitively located in Lambeth. The Borough takes a long term view towards their protection for their employment role. Employment is addressed in Strategic Policies G20-25 and Chapter 3 Employment in the Adopted UDP, and in Strategic Policies C, F and H and Policies 6 and 20-25 in the Revised Deposit Replacement UDP.

The core output indicators and local indicators under the Employment theme cover the issues of Business Development (matters relating to employment land) and Local Services (specifically office development.) With respect to employment land, the indicators will monitor the effectiveness of the policies in the Unitary Development Plan (UDP) in securing land developed for employment use across the Borough. Specifically, the indicators monitor whether the Borough's stock of employment land is increasing or decreasing (particularly whether it is being lost to residential use); whether land developed for employment use is taking place in locations designated for such use in the UDP; and how such development is broken down into the various employment types. In respect of office development, the indicators are monitoring the amount of completed office development, and how much of this is taking place within town centres.

4.1 Employment Land

The Borough does not currently have accurate figures for the amount of employment land outside of KIBAs. However much is known about the composition of land uses within KIBAs. The Borough's KIBA designations were reviewed as to their viability by the Atkins Employment Study (December 2004). The Atkins study concluded that they provide an important contribution to meeting demand in key sectors which are competitively located in Lambeth, and are also important in maintaining employment opportunities of local and sub-regional importance in the Borough.

The Atkins Employment Study found that there is currently a total of 515,210 sqm of employment floorspace located within the Borough's 29 KIBAs, which cover some 59.73ha. Of this, some 45,491sqm is currently vacant (8.9%) of the total. Within the KIBA boundaries as currently defined there is some 69,200sqm of other floorspace, comprising of non B use class uses including mixed use, residential, community, educational, retail and other uses (comprising, overall, some 12% of the total KIBA floorspace). This is indicative of the mixed use nature of much of inner London.

Non-employment uses within KIBAs in most cases do not exceed 25% of the total amount of employment. Around half of employment floorspace within KIBAs can be characterised as office type accommodation, including flexible workspace that has more of an office type character as opposed to light industry or storage/distribution. Around 19% of floorspace is categorised as having a primary B8 storage distribution function, and 13% of the total employment floorspace comprises B1(c) use. Sui generis (7%) and B1(b) uses (1%) make up the remainder of the employment floorspace within KIBA designations.

OBJECTIVE: Maintain the supply of employment land
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Strategic Policies: **G20 and Strategic Policies C and H**

Policies: **EMP6, EMP7 and Policy 22**

Target 4A

To minimise the loss of employment land, including land designated as KIBA on the UDP Proposals Map and in the forthcoming LDF.

Indicator 4A (Core Output Indicators 1d and 1e)

Generally, the Council will refuse planning permission for applications proposing non-employment uses on pure KIBA sites. On KIBA sites with Mixed Use Area designation, the Council will generally refuse planning permission for applications proposing non-employment floorspace if it considers that the proposal does not incorporate the maximum feasible amount of employment floorspace. The Council will normally approve schemes on KIBA (Mixed Use Employment Area) sites if they incorporate what is considered to be the maximum employment element possible (taking into account viability) and the non-employment element (most often residential) is designed appropriately, given its location in predominantly employment or industrial areas. Approval will usually be given for schemes resulting in a loss of employment floorspace on sites outside KIBAs, if a sufficient justification is made under the relevant UDP policy criteria for assessing such proposals.

Target 4B

To minimise the loss of employment land to residential development.

Indicator 4B (Core Output Indicator 1f)

The Borough does not have detailed information on the amount of employment land lost to residential development. However, details of completed permissions granted in the 2004/2005 financial year that result in change of use from B1, B2 and B8 floorspace to residential, obtained from the London Development Database (Greater London Authority)¹ provide a picture of the scale of this type of change of use. Some 18 permissions were given, with a resultant loss of some 8962sqm employment floorspace. It is not known at this point how much of this has been developed out into residential use.

Conclusion

The Council is successfully implementing Policy 22 at present, and maintaining a satisfactory supply of employment land through adopting a very tough line on proposals to introduce non-employment uses onto its safeguarded employment land (KIBA designated sites). The Atkins Employment Study fully supports the retention

¹ Figures are restricted to permissions where a floorspace has been entered. Schemes proposing re-provision of some employment floorspace have also been omitted from consideration because there is detail on the amount of re-provided employment floorspace, unless this detail is specified.

of all KIBAs designated on the UDP Proposals Map, and the Council does not intend to de-designate any such land.

The criteria-based approach to managing the transfer of non-essential and marginal employment land and floorspace to other uses (most often residential) is also being implemented with success. Policy 22 allows mixed use development on some KIBA sites, and Policy 23 (dealing with sites outside of KIBAs), and EMP6 and EMP7 allow non-employment uses when it can be adequately demonstrated that demand no longer exists for employment (or full employment) use of a site previously in such use.

When Policies 22 and 23 are fully implemented following UDP adoption, and EMP6 and EMP7 are fully superseded, the Council expects that implementation of the emerging policies will be even more successful on account of the policy framework being simplified down to only one set of UDP policies.

OBJECTIVE: To maximise the use of previously developed land for employment use

Strategic Policies: **Strategic Policy C**
Policies: **Policy 6**

Being an inner London Borough characterised by high density, fine grained development, it is unlikely that any proposals would come forward on sites that are not 'previously developed land' as defined in Annex C of PPG3 (March 2000).

Target 4C

100% of all employment development floorspace to be on previously developed land.

Indicator 4C (Core Output Indicator 1c)

Based on the most recent ODPM figures obtained from the London Plan Annual Monitoring Report 1 (January 2005), the percentage of employment development on previously developed land within Lambeth is 99%.

Conclusion

Lambeth's policies, along with its locational and built characteristics, ensure that all new employment development is provided on previously developed land. It is expected that this trend will continue indefinitely.

4.2 Employment Development

Because of the nature of the UDP policies relating to employment development, there will be losses of existing employment floorspace to non-employment uses, particularly residential (covered in Target/Indicator 4A above). Briefly, some KIBAs are also overlaid with designation as Mixed Use Employment Areas, where some non-employment uses are allowed, while the overall development should still be predominantly employment-based, commensurate with the underlying designation still as a KIBA. The justification for this is that mixed-use development may be the only way of facilitating employment development on sites that have very poor access, contain very low value uses or land or buildings in a very poor state of repair. Furthermore, outside KIBA locations, UDP policies prescribe a more flexible, criteria-based approach to the protection of land and buildings in employment use, than the more strategic safeguarding of employment uses within KIBAs. Within this policy

context, the Council will support proposals that increase employment levels and floorspace throughout the Borough.

OBJECTIVE: To promote and support new employment floorspace.

Strategic Policies: **G21, G22, G23 and Strategic Policy H**

Policies: **EMP4, EMP6-11, EMP14 and Policies 21, 22 and 23**

4.2.1 Borough-wide

Target 4D

To maximise the amount of floorspace developed for employment uses across the Borough.

Indicator 4D (Core Output Indicator 1a)

At present, the Council does not have comprehensive information to hand on net gains and losses of employment floorspace, by type, over the 2004/2005 financial year. An indication of the scale of office floorspace, specifically, that has been given approval is dealt with below in Target/Indicator 4F. In terms of other employment development, the Council has continued to support proposals for additional employment floorspace, although new employment floorspace tends to come forward as part of mixed use developments. Recent examples include a number of approved schemes in the Stannary Street KIBA, in Kennington, at 26-34 Stannary Street (503 sqm of B1 floorspace approved), and 33 Stannary Street (1261sqm of employment floorspace approved). Similarly, a number of schemes proposing increased employment floorspace have been approved in the Norwood Commercial Area. For example 1321sqm of new commercial and industrial floorspace was given approval as part of a mixed use redevelopment of the site at 15-16 Cotswold Street.

4.2.2 Within Key Industrial and Business Areas

Target 4E

To increase employment floorspace within designated employment areas (KIBAs).

Indicator 4E (Core Output Indicator 1b)

In almost every case where non-employment uses are proposed on pure KIBA sites (with no overlying Mixed Use Employment Area designation), the Council has refused planning permission. Conversely, where well designed proposals to increase the amount of employment floorspace on KIBA sites do come forward, the Council has generally always granted permission. Examples are cited above.

4.2.3 Office Development

Target 4F

To maintain a sufficient supply of B1(a) office floorspace throughout the Borough.

Indicator 4F (Core Output Indicator 4a)

The Council is generally supportive of large scale office development in appropriate locations (see local indicator 4.8 below). Since as far back as 1998, large scale office developments have gained approval from the Council. When looking at applications for office developments over 1000sqm granted between 1999 and 2004, some 17 proposals were approved, providing some 137,231sqm of B1(a) floorspace to the office pipeline. Only one office development has been developed during the

2004/2005 financial year, that at Phoenix House, Vauxhall, comprising some 6000sqm of B1(a) floorspace.

4.2.4 Office Development in Town Centres

Target 4G

To manage the supply of office space in town centre locations so as to retain beneficial office space in demand and release surplus office space for other uses.

Indicator 4G (Core Output Indicator 4b)

Generally speaking, the Council takes a flexible approach to the management of office space in town centres. Over the 2004/2005 financial year, the Council received no major new office development proposals within any of its town centres, and no such developments were completed. In terms of small scale office developments (less than 1000sqm), the Council would support proposals for new offices space, however such applications are rare. Far more regular are proposals seeking to change the use of vacant office space above shops to other uses, usually residential use. If it can be demonstrated that there is no further demand for such office space, the Council would ordinarily support such proposals, in the interests of making best use of its land and buildings.

Conclusion

The Council is successfully achieving the objective of its policies that seek to promote and encourage employment growth and increase employment levels, across the Borough, but particularly in designated areas (KIBAs for industrial and employment activities, and designated major office locations).

The Council is successfully directing major office developments towards those suitable locations set out in the UDPs. The major town centres of Brixton and Streatham are not attracting the same level of interest in terms of major office development as locations in Waterloo and Vauxhall, however it is not considered that this is a reflection of the policies, but rather an indication of locational demand in the office sector. Within town centres, the Council is successfully implementing its policy of allowing the release of surplus office space, particularly that above shops to other uses.

Office development aside, schemes proposing employment or mixed use development are continuing to come forward on sites within and outside KIBAs. On KIBA sites, developments that do not maximise the site's employment potential have generally been refused, and usually upheld at appeal. Once Policy 22 is fully adopted, the Council expects to be able to implement it to maximum effect.

4.3 Location of Major Office Development

OBJECTIVE: To ensure that major office development occurs in appropriate locations, as specified in the UDP.

Strategic Policies: **G25 and Strategic Policy F**
Policies: **EMP10 and Policy 21**

Major office developments introduce new workers in such numbers that they can have a discernible impact on services and infrastructure in the immediate vicinity. The UDP policies aim to direct such large-scale developments to locations that have high public transport accessibility and a level of infrastructure that can handle such

development intensities. In Lambeth's case, these locations are in Waterloo, Vauxhall Cross, Albert Embankment and the major centres in Brixton and Streatham. By siting major development at transport nodes, this also reduces the need to travel, in line with sustainability objectives. In other locations large offices are resisted in line with long established policies to protect residential character and amenity, and to promote other uses such as more housing.

Target 4H

To achieve a high proportion of all 'major office developments' (over 1000sqm of B1 office floorspace) within the locations set out in EMP10 and Policy 21.

Indicator 4H (Local Output Indicator)

One major office development was completed during the 2004/2005 year, being Phoenix House on the Effra site at Vauxhall Cross, which is a site suitable for major office development.

Conclusion

Policies EMP10 and 21 ensure that all new major office development is directed to the locations identified as suitable in the UDPs for such large scale development. It is expected that this trend will continue in the future.

Section 5 - Retail, Leisure and Town Centres

The London Borough of Lambeth is committed to a vital and viable network of healthy, thriving, attractive and prosperous town centres, functioning as economic and social hubs that serve their catchment areas with a wide range of necessary comparison and convenience retail, leisure and other necessary services. Some of the challenges facing Lambeth will be to accommodate for additional levels of retailing within the context of its network of town centres, many of which are wholly or partly situated within conservation areas and contain a notable residential presence. This will require careful, pragmatic and balanced planning policies that will ensure that improvements in one aspect of town centre regeneration will not be to the detriment of others. Lambeth will also seek a distribution of future retail and leisure provision to town centres where they are appropriate and suitable in terms of scale, role and character, in line with national planning guidance.

Retail, Leisure and Town Centres is addressed in the Adopted UDP in Strategic Policies G26-G33, Chapter 4: Shopping and Chapter 10: Recreation and Leisure. In the Revised Deposit Replacement UDP it is addressed in Strategic Policies I, J and M and in Policies 4, 5, 19, 26, 29, 52-54, 57, 59-60, 64 and 66. These policies cover Town Centre Regeneration, assessment of major retail and leisure uses, maintaining an active town centre frontage, ensuring an appropriate level of night time economy uses in town centres, as well as town centre specific policies.

The key focus for retail, leisure and town centre monitoring in this Annual Monitoring Report is the amount of completed retail and leisure development as well as the proportion of total completed retail and leisure development that has occurred in town centres, as these have been identified as Core Output Indicators. A Local Output Indicator will also be used to review the vacancy rates of the borough's town centres, which in conjunction with broader economic factors can, through uptake of and demand for town centre retail units, provide a reflection of how well the town centre policies are operating. This indicator will also highlight whether the range of town centre policies are functioning to create a vital and viable town centre which encourages uptake of existing retail space and generates demand for new retail space.

5.1 Retail and Leisure Development

Lambeth has a network of major and district town centres as well as local/neighbourhood centres serving local needs. It is important that the borough expands and improves this retail, leisure and service network and ensures that future retail, leisure and service demand can be realised in a sustainable fashion. By doing so the local economy will be strengthened and the need to travel to other local or out of town centres will be reduced.

OBJECTIVE: Encourage the regeneration and improvement of town centres through the provision of additional retail and leisure facilities to reflect identified need and available capacity.

Strategic Policies: **G26, G35 and Strategic Policies I, J and M.**

Policies: **S3, S5, RL1-2, RL36-37, RL39, RL43-46 and Policies 4, 5 and 26.**

Regional research² has identified for the London Borough of Lambeth a convenience floorspace requirement of 14,631sq.m at moderate growth to the year 2016. This figure will need to be refined through further local retail assessments to consider local circumstances and qualitative analysis of retail provision, however it does provide a broad indicative guide as to the amount of retail that the Council will aim to achieve over the period 2006-2016.

Similar research has also identified a number of scenarios for provision of comparison retail over the same period to 2016³, based on retail productivity levels and assuming levels of sales density per sq. metre. At the supported level of retail productivity of 2.5% and assuming a sales density of £4000/sq.m, a comparison floorspace requirement projected for the London Borough of Lambeth is 10,851sq.m. Whilst this projection is lower than that concluded in independent studies carried out by the borough, this figure does consider large planned retail developments in adjoining boroughs and acknowledges increased levels of productivity. It will also, as with convenience retail provision, need to be further refined to account for local circumstances. It nonetheless provides a broad indicative guide to the amount of comparison retail that the Council will aim to secure over the period 2006-2016.

An independent leisure assessment carried out for the Council in 2001⁴ indicated that for the period to 2011 there was limited demand for an additional small cinema and no further demand for health and fitness facilities. The consultants also concluded that any further leisure facilities could be determined through the Council's planning policies. The Council does not consider, in the light of such limited demand for leisure facilities, that there is any practical target to set for leisure provision and that additional facilities can be secured through its planning policies.

Target 5A

In Policy 4 a pattern of town centre development to sustain and enhance the vitality and viability of the Borough's town centres is promoted, with the development of centres to occur in a complementary manner. Subject to further retail analysis for refinement of regional estimates and depending on retail provision secured in any one annual period, the Council will endeavour to secure on average the provision of 1000-1500sq.m gross of convenience retail provision and 1000sq.m gross of comparison retail provision appropriately and sustainably distributed throughout the borough's network of town centres. However, there are factors to consider in the measurement of retail provision in the borough. Firstly there is the neighbouring borough of Westminster, the main comparison shopping magnet in London and south-east England. This has an evident impact on comparison retail strength and provision in the borough and therefore significant developments in Westminster can affect the demand for comparison units in any given year in Lambeth. Secondly, it is important to consider the time lag between planning permission and implementation of retail schemes and also the fact that development of significant retail schemes, particularly convenience, do not occur regularly yet when they do occur they can add several thousand square metres to the Borough's convenience retail provision. Due to such factors, it is proposed to measure retail provision in the Borough on a 5-year basis rather than annually, as an annual figure may be low in any one year and heavily compensated for in the following year, for which an annual benchmark would not be justified.

² GLA London Town Centre Assessment, Stage 2: Convenience Goods Floorspace Need, May 2005.

³ GLA London Town Centre Assessment, Stage 1: Comparison Goods Floorspace Need, September 2004.

⁴ Retail and Commercial Leisure Study, Drivers Jonas, September 2001.

Indicator 5A (LDF Core Output Indicator 4a)

The Council's records of completed retail development for the past years are currently incomplete, however there is significant information to provide anecdotal evidence as to the amount of completed retail development and whether the target is achievable. Over the past 5 years there has been a recorded 3937sq.m. gross of convenience retail completed and 1217sq.m. gross of comparison retail completed. There has also been a further 2947sq.m of recorded A1/A2 for which information on the retailer is not currently known, therefore it could be either convenience or comparison. However, assuming that the bulk of convenience retail provision is contained in the major retail stores that constitute the 3937sq.m, and that of the 2947sq.m A1/A2 use only a small proportion is local convenience provision, this would imply that the actual comparison retail figure is closer to 4000sq.m over the 2000-2005 5-year period. On this basis, and accounting for the refinement of regional estimates to be carried out as well as assuming a higher level of productivity in the future, this would suggest that the Council should achieve the broad regional targets. This can be reviewed annually but only the 5-year monitor period will provide a valuable indicator as to whether the Council is meeting the regional targets.

Conclusion

The Council is broadly achieving the estimated projected retail growth based on completed retail development over the past 5 years. However changes in retail provision or demand could be triggered by major developments in neighbouring boroughs, changes in the economy, accelerated increase in the level of productivity or changes in shopping patterns. Should the 5-year monitor indicate that the Council is not meeting the target for new retail development, taking into account such factors as noted above of how retail provision/demand can vary, the Council will have to review the policies on retail and town centres.

5.2 Town Centres

In terms of reducing the need to travel to local services and creating a sustainable network of town centres, it is important to ensure that the primary location for retail and leisure is within town centres and that they are discouraged from out of town locations. This ensures that the clustering of activities occurs in areas of high public transport accessibility and can encourage the cross fertilisation of often disparate business activities. In addition to increased residential provision and a range of other services, this will safeguard a network of vital and viable town centres.

OBJECTIVE: To ensure that the provision of retail and leisure in the borough is directed primarily to the appropriate town centre in a manner that is sustainable and protects the network of town centres in the borough.

Strategic Policies: **G26, G35 and Strategic Policy I, J and M.**

Policies: **S3, S5, RL1-2, RL36-37, RL39, RL43-46 and Policies 4, 5 and 26.**

Target 5B

The Council will strive to direct as much as possible of future retail and leisure provision to the appropriate town centre within the borough's network of town centres. However, there may be occasions when a retail or leisure development, having been subjected to the sequential approach and any other applicable tests of retail impact, can not be accommodated in a town centre whilst there is an identified need for such a facility. It would not be realistic, therefore, to exclude the potential that out of town centre development will occur, as identified in national guidance as the least preferred option of the sequential approach. The Council will aim, therefore,

to achieve the majority of all new retail and leisure floorspace in the appropriate town centre within the borough's town centre hierarchy in accordance with national guidance.

Indicator 5B (Core Output Indicator 4b)

Of the 8101sq.m. of retail developed in the 2000-2005 period, 3658sq.m. was located in town centres, a proportion of 45%. However this figure is not wholly representative due to the development of a single out-of-centre convenience store (Tesco) of 2829sq.m. gross floorspace at the site of the former South London Hospital for Women, Clapham which was granted permission by the Secretary of State, without which the proportion of development in town centre locations would have been 70%. A proportion of 70% of all retail developed located in town centres would indicate that a significant level is being attracted to town centres.

Conclusion

The Council policies are established to ensure that the majority of retail development is located in town centres. For the 5-year period 2000-2005 the proportion of retail development in town centres was distorted somewhat by a large convenience store in an out-of-centre location granted permission by the Secretary of State. This aside, the Council is locating the majority of retail development in town centres, not taking account of current major retail proposals also in town centre locations. Should the case arise that there is a decrease in the proportion of retail attracted to town centre locations, the Council will review its town centre policies and town centre boundaries as currently mapped. The results of retail levels achieved in town centres can also be factored in to future development briefs to inform appropriate uses on redevelopment sites, such as those in the Council's *Revitalise* Programme.

5.3 Vacancy Rates

A visible manifestation of the health of a town centre can be the level of vacancy existing in the centre and the demand for units in the centre, particularly from profile retailers. The Council acknowledges that there will always be a level of vacancy in town centres for a range of reasons and that Experian GOAD have calculated the average vacancy rate in the UK to be 10.6%. However in terms of regenerating town centres and increasing vitality, where feasible vacant units can be the first step in increasing retail provision whilst simultaneously improving the image of the centre. The Council has carried out an independent retail capacity study⁵ and has up to date figures of vacancy rates in its major and district town centres. This study concluded that three of the major/district centres had below national average vacancy rates whilst three others were slightly above (see Table 5.1 below). Vacancy rates can assist in indicating where, for example, Council policy may be failing to accommodate for a certain proportion of a specific use type or retail facility in a town centre. Alongside the provision of new retail and leisure facilities, through its range of retail policies the Council will endeavour to improve town centres, resist any increase in vacancy rates and to bring all vacancy rates to below the national average recorded by Experian GOAD.

OBJECTIVE: To resist any increase in vacancy rates and, where possible, reduce the overall proportion of vacant units in the major and district town centres within the borough's network of town centres.

⁵ Nathaniel Lichfield & Partners, London Borough of Lambeth – Food and Drink Capacity and Retail Market Study, August 2004.

Strategic Policies: **G26, G35 and Strategic Policies I, J and M.**

Policies: **S3, S5, RL36-37, RL39, RL41, RL43-46 and Policies 4, 5 and 26.**

Table 5.1: Vacancy Rates in Major and District Town Centres in Lambeth

Town Centre (Classification)	Total Units	Total Retail	Total A2	Total A3	Vacant (Vacancy Rate %)
Streatham (Major TC)	455	243 (53%)	82 (18%)	81 (18%)	49 (10.8%)
Brixton (Major TC)	352	247 (70%)	31 (9%)	44 12.5%)	30 (8.5%)
Clapham (District TC)	205	101 (49%)	37 (18%)	54 (26%)	13 (6.3%)
Lower Marsh/Waterloo (District TC)	101	51 (50%)	10 (10%)	26 (26%)	14 (13.9%)
Stockwell (District TC)	33	22 (67%)	5 (15%)	4 (12%)	2 (6.1%)
West Norwood (District TC)	144	75 (52%)	23 (15%)	28 (19%)	18 (12.5%)

Target 5C (Revised Deposit Replacement UDP Target)

The Council will strive through its policies to retain and improve upon the proportion of town centre active frontages and will resist the potential for increases in vacancy levels. Where vacancy rates are above the Experian GOAD national average, the Council sets out in the Revised Deposit of the Replacement UDP that it seeks a 20% reduction in vacant floorspace in cores of town and district centres 2002-2017.

Indicator 5C (Local Output Indicator)

The baseline study was completed in August 2004. The figures concluded that of the six town centres monitored, three were above the national vacancy average and three were below. The three towns above the national vacancy average were Streatham (10.8%), Lower Marsh (13.9%) and West Norwood (12.5%). The Council will monitor the vacancy rates of these three centres against its emerging policies.

Conclusion

Levels of vacancy can often signify the health of a town centre and, more broadly, the health of the economy. Should there be increases in vacancy across the borough, the Council will review its policies relating to appropriate proportions of use types in town centres (e.g. minimum levels of A1 and maximum levels of A3-A5) whilst taking into account the current economic conditions.

Section 6 - Transport

Lambeth is the Highways Authority for roads within the borough that are not managed by Transport for London, and is responsible for providing and maintaining this land and infrastructure to ensure access to and between properties. Roads provide for pedestrian, cycling and vehicular transport modes. Lambeth is not responsible for providing public transport services, however, it must coordinate with Transport for London and other service operators to ensure these facilities and services are accessible to residents and for visitors to the borough.

Providing an equitable and sustainable transport system is a significant influence on the borough's and the City's ability to provide a sustainable community, and likewise, has a significant role to play in maintaining a healthy environment. Lambeth has strong goals for improving accessibility and for reducing the impacts of transport on people and the environment. The policies relate primarily to limiting the amount of travel required, discouraging the use of private vehicles by encouraging the use of other modes, improving road safety for all users, and minimising car parking congestion.

Lambeth's transport policies are described primarily in Strategic Policies G39, G40 and G43 and in Policies T1 to T43 in the Adopted UDP and Strategic Policies F and G and Policies 8 to 14 in the Revised Deposit Replacement UDP.

Indicators used in this Annual Monitoring Report relate to public transport accessibility and car parking.

6.1 Car Parking

The Council's policies that describe car parking requirements for new developments differ between the Adopted and Revised Deposit Replacement UDPs. The main difference between the policies lies in a general reduction in the number of spaces necessary for a development, and a shift in priority to describe the policies as a maximum number of car spaces, rather than a minimum. This change responds to National Guidance, and aims to reduce the number of car parks provided, thereby discouraging the use of private vehicle transport. Developments involving car parking are assessed against the policies in the Revised Deposit Replacement UDP.

Parking for bicycles has also become a greater priority, and encouragement of car-free residential developments has also been included, to further discourage the use of private motor vehicles in area with Good, Very Good or Exceptional public transport accessibility.

OBJECTIVE: Provide adequate parking for resident and local business needs
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Strategic Policies: **G43**

Policies: **T10 - T15 and Policy 14**

Target 6A

Ensure that all development complies with the car parking standards in the Revised Deposit Replacement UDP.

Indicator 6A (Core Output Indicator 3a)

The policies relating to the provision of car parking in the Revised Deposit Replacement UDP carry significant weight in assessing car parking. The Council

considers that compliance with car parking standards is a significant issue, and requires that these criteria be met. Only exceptional circumstances, for example special needs housing, or development in areas of poor public transport accessibility will warrant the approval of development not meeting these standards.

Conclusion

The indicator demonstrates that the Council is appropriately applying its policies, which reflect the London-wide and national goals for reducing car parking, and accordingly reduced car use.

6.2 Public Transport Accessibility

Council policies aim to ensure that new facilities as well as changes to existing facilities make public transport more accessible and efficient to use. They also aim to provide for new facilities and protect sites that have been identified as strategically significant.

OBJECTIVE: Maintain and improve public transport accessibility levels within the borough.

Strategic Policies: **G39, G40 and Strategic Policy F**
Policies: **T16-T41 and Policies 8 and 12**

Target 6B

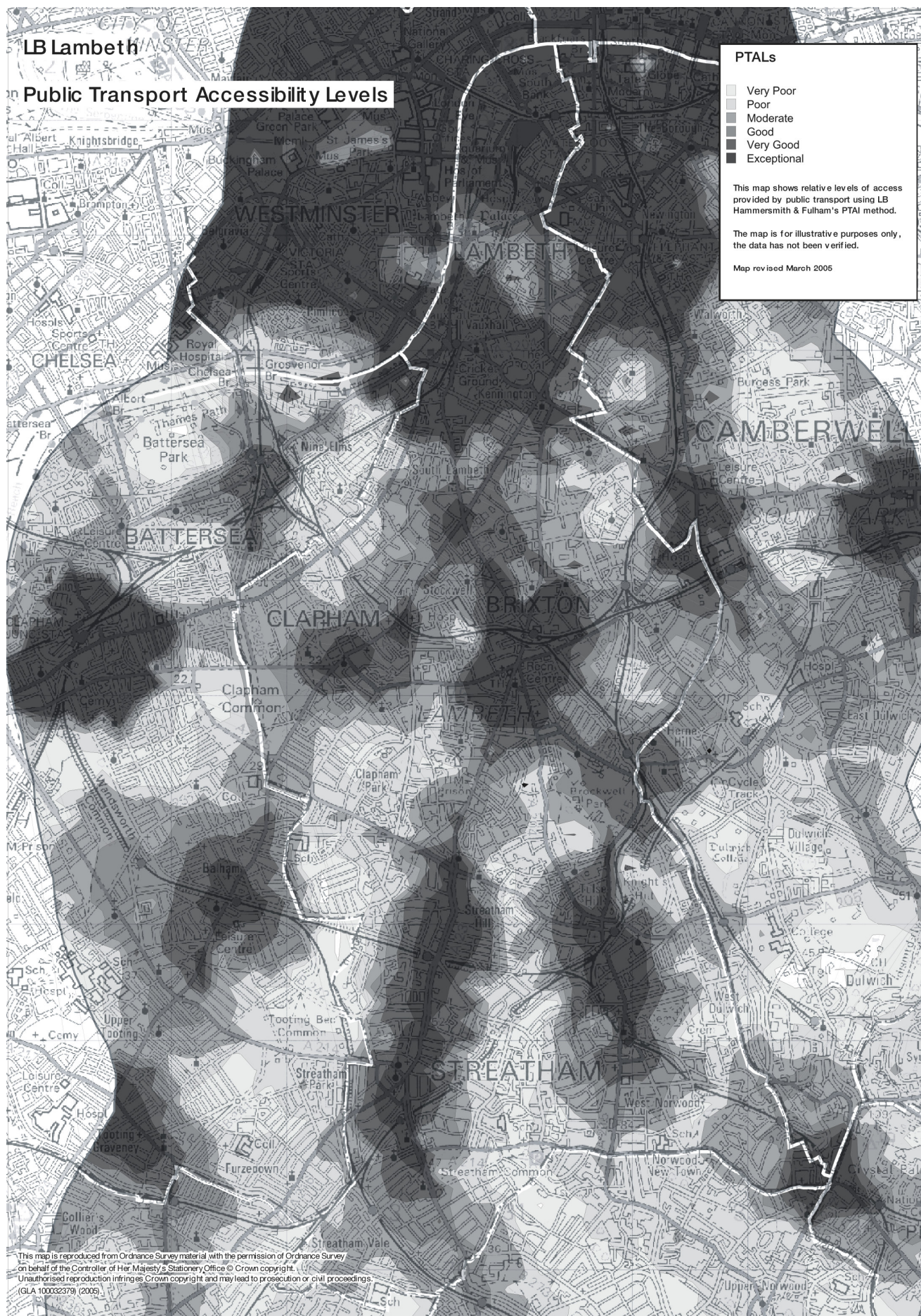
Increase the proportion of the borough that is served by Moderate, Good, Very Good or Exceptional PTALs.

Indicator 6B (Core Output Indicator 3b)

The borough is located in inner London, and accordingly enjoys comparatively good access to public transport. The following Public Transport Accessibility Levels (PTAL) Map (Table 6.1) shows that over half of the borough is provided with Moderate, Good, Very Good, or Exceptional public transport accessibility.

Conclusion

The borough is currently well serviced by public transport, however there are areas that remain with poor levels. The Council's policies provide for and protect sites for proposed transport facilities, and it is expected that the proportion of the borough with Good and better PTALs will increase over time, however this is a slow process. It is also difficult to determine how much of any improvement will be attributable to UDP policies, as other authorities (e.g. TfL) and Council works programs are likely to have a greater impact on these figures in the future.

Table 6.1: Public Transport Accessibility Levels Map (Transport for London)

Section 7 - Natural Environment

7.1 Open Space

Within the London Borough of Lambeth there are numerous public and private open spaces. The majority of these are owned and managed by the Council, and include some of London's most prominent and historic open spaces, such as Brockwell Park, Clapham Common and Kennington Park. The Council recognises the economic, social and environmental value that these open spaces can create as well as the physical and mental 'quality of life' benefits that they can provide.

The Council carried out an audit of open space in 2004. This indicated that there are 228 open space sites over 0.2 hectares in or adjoining the borough, totalling 410 hectares of open space. These spaces cover the range of open space types outlined in PPG17 (Annex: Definitions (2)) with wide variations in their size and quality. The report also highlighted quantitative and qualitative variations on a ward basis within the borough.

Open Space is addressed in the Adopted UDP in Strategic Policies G8-9 and G35-38 and in Chapter 7: The Environment and Chapter 10: Recreation and Leisure. In the Revised Deposit Replacement UDP it is addressed in Strategic Policy M and Policies 44, 45 and 45a. These policies cover protection of Metropolitan Open Land, protection of Open Space and Sports Facilities and a specific policy for the Oval Cricket Ground, an open space sports facility with world renown.

The ODPM Good Practice Guide puts forward achievement of Green Flag Award Standard for open spaces in the borough as a Core Output Indicator. However, this is a demanding standard and at present a more realistic objective will be to identify targets with the Parks section in improving open space in relation to priorities identified in the audit of open space. A Local Development Indicator will also be used to monitor the gross amount of open space provided in the borough's wards, many of which are deficient in open space and in which protection and improvement of the existing open space facilities is essential.

OBJECTIVE: The Council will seek to improve the quality of open space.

Strategic Policies: **G9, G36 and Strategic Policy M.**

Policies: **RL16, RL20, RL21-24, RL26 and Policies 44 and 45.**

Target 7A

The Council will endeavour, through its policies and parks management, to raise the levels of maintenance and management of its managed open spaces. An example of such an initiative in 2004/2005 is the upgrading of Milkwood Open Space in the south of the borough.

Indicator 7A (Core Output Indicator 4c)

The number of open spaces improved annually.

Conclusion

The Council will seek to improve its open spaces, with assistance where appropriate through the planning system, by way of planning obligations.

OBJECTIVE: The Council will resist the loss of any open space in the Borough and, where possible, provide new open space.

Strategic Policies: **G26 and Strategic Policy I.**

Policies: **S3, S5 and Policies 4 and 5.**

The audit of open space in Lambeth concluded that of the 21 wards in the borough, only 4 contained a level of open space greater than that recommended by the NPFA (2.4ha/000 pop.). These wards were those adjoining large commons or a major park. The average open space provision across the borough was 1.54ha/000 population. Whilst the potential for inner London boroughs to achieve NPFA standards is limited, particularly considering existing built form and development demand in central London, it is important to retain as much open space as possible as it is a vital component of attractive urban form. This is already severely limited in some wards, where further encroachment would not be acceptable without suitable replacement within the vicinity.

Target 7B

To retain the existing amount of open space in the borough and where possible increase the amount and quality of open space.

Indicator 7B (Local Output Indicator)

The open space audit (2004) indicated that the borough contains an average of 1.54ha of open space (sites greater than 0.2ha) per 1000 population.

Conclusion

As an inner London borough, the Council also has to balance a range of development pressures alongside maintaining a network of open spaces. The gross amount of open space reflects the fact that the Council is located in inner London, where space is at a premium. The Council will protect its existing provision of open space and, where feasible, increase the provision of open space over the period of the UDP depending on available funding and opportunities that may come forward through redevelopment proposals.

7.2 Biodiversity

The London Borough of Lambeth is a central London authority with intense pressure for development and a high population density. In spite of this it is rich in biodiversity in terms of the number of sites in the borough that are protected for nature conservation purposes and the numbers of species that can be found in the borough.

Biodiversity is addressed in the adopted UDP in Strategic Policy G8 and Chapter 7: Environment (ENV1-6). In the Replacement UDP it is addressed in Strategic Policy L and in Policies 46, 58 and 61. These policies cover the protection and enhancement of nature conservation sites and wildlife habitats as well as the design and management of other open spaces for nature conservation. There are specific policies for Clapham Common and West Norwood Cemetery.

The key focus for Biodiversity in this Annual Monitoring Report is on any change in priority habitats and species and the change in areas designated for their intrinsic environmental value.

OBJECTIVE: The Council will seek to protect priority habitats and species, including Sites of Nature Conservation Importance.

Strategic Policies: **G8 and Strategic Policy L.**

Policies: **ENV1-3 and Policy 46.**

The Council through its Biodiversity Action Plan has identified priority habitats and priority species that are offered a high level of protection due to their limited or declining numbers locally, regionally, nationally or internationally. These habitats include Acid Grassland; Allotments and Community Gardens; Churchyards and Cemeteries; Ponds and Open Water; Parks, Public Gardens and Open spaces; Railsides; Tidal Thames; and Woodlands. Priority species include the bat, blackbird, crucian carp, house sparrow, reptiles, stag beetle and mistletoe.

There are 35 designated Sites of Nature Conservation Importance in Lambeth, including one site of Metropolitan Importance, this being the River Thames. There are 17 sites of Borough Importance and 17 sites of Local Importance.

7.2.1 Priority Habitats and Species

Target 7Ci

The Council will also work to ensure the protection of the priority species as outlined above, however the measurement of species is not a straightforward or regular occurrence in the Environment Department and it is therefore more practical to ensure species protection through habitat protection. Species that are a priority are so due to their declining numbers and risk of local extinction, such as the house sparrow and the adder, and a quantitative measurement of their protection is difficult to establish and is better represented by their habitat protection. There is, however, ongoing work through the Biodiversity Action Plan, approved in October 2005, on priority species that can feed into the AMR, however this will not be on an annual basis. Measures will also be sought, through proposed development, to contribute to nature conservation sites as part of the open space network to improve levels of protection to both the habitats and the species to be found on them.

Indicator 7Ci (Core Output Indicator 8i)

All of the priority species were recorded in the borough in the Biodiversity Action Plan during this period. In the year 2003/4 there was no loss of any priority habitats. Through the research conducted for the Biodiversity Action Plan it was, however, noted that the quality of some of the Sites of Local Importance had declined.

7.2.2 Sites of Nature Conservation Importance

Target 7Cii

The Council will strive to protect all of the 245.7ha of Sites of Nature Conservation Importance in the Borough, as identified in the survey of Nature Conservation in Lambeth, as well as increase this level of nature conservation land where achievable.

Indicator 7Cii (Core Output Indicator 8ii)

There has been no loss of land in Sites of Nature Conservation Importance.

Conclusion

The Borough, as noted above, has a rich and diverse provision of biodiversity. The Council will continue to offer the highest level of protection to its network of nature conservation sites. The Council will also seek improvement to these sites and expansion in the number of sites where feasible in order to ensure sustained

provision of such sites of nature conservation and the habitats and species that depend upon them. The first focus for improvement of sites of nature conservation will be the Sites of Local Importance identified in the BAP as having declined in quality. However the Council has, to date, managed to protect all of its nature conservation sites and, therewith, the habitats and species dependent on them.

Section 8 - Environmental Resources

A wasteful attitude to the exploitation of natural resources, such as water, and the extravagant use of energy are matters that planning is now trying to address. Water is a necessary and finite resource. It is necessary firstly to maintain life and health, but is also used in many necessary domestic and industrial activities. Council planning policies have a role in ensuring that development is not affected by flooding and does not cause adverse flooding effects elsewhere. Planning can help be seeking to ensure that the quality of water can be safeguarded and that amount of energy used in builds is reduced.

Lambeth's policy on water is described primarily in Strategic Policy G12 and Policy 18 in the Adopted UDP, and in Strategic Policy N and Policy 48 in the Revised Deposit Replacement UDP. Renewable energy is addressed in the Adopted UDP in Strategic Policy G13 and in policies ENV16, ENV23 and RL38, and in Strategic Policy K and N and in Policy 32a and Policy 47 in the Revised Deposit Replacement UDP.

The key focus for monitoring of Environmental resources in this Annual Monitoring Report is flood protection and water quality and renewable energy, as these have been identified as Core Output Indicators.

8.1 Water Quality

The Council aims to minimise pollution by applying strict development standards for drainage, waste and pollution.

OBJECTIVE: Maintain water quality for the borough and the city.
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Strategic Policies: **G12 and Strategic Policy N.**

Policies: **ENV18 and Policy 48 (C).**

Target 8A

To ensure that no planning permissions in respect of water quality are granted contrary to the advice of the Environment Agency.

Indicator 8A (Core Output Indicator 7)

The Council takes advice from the Environment Agency very seriously. It is understood that no planning applications were permitted where they conflicted with the advice of the Environment Agency, in relation to water quality.

Conclusion

This indicator does not specifically relate to the content of the Council's policies, but to adherence to advice provided by the Environment Agency to reflect national policy on water quality. It is expected that the Council will continue to meet this target indefinitely.

8.2 Flood Protection

The Council aims to minimise flood risk for new and existing development through minimising additional run off in areas likely to influence local flooding, and by precluding development in flood prone areas, where the impacts cannot be mitigated.

OBJECTIVE: Maintain flood immunity for development.

Strategic Policies: **Strategic Policy N.**

Policies: **ENV18 and Policy 48 (D).**

Target 8B

To ensure that no planning permissions in respect of flood defence are granted contrary to the advice of the Environment Agency.

Indicator 8B (Core Output Indicator 7 and Environment Agency High Level Indicator 12)

In 2003/04, no planning permissions were approved contrary to the advice of the Environment Agency, in relation to flood defence. It is understood this is also the case for the 2004/05 year.

Conclusion

This indicator does not specifically relate to the content of the Council's policies, but to adherence to advice provided by the Environment Agency to reflect national policy on flood defence. It is expected that the Council will continue to meet this target indefinitely.

8.3 Renewable Energy

The Replacement UDP introduced a new policy at Revised Deposit seeking 10% of the energy requirements of major developments to be met through renewables. This follows on from the general support given to renewable energy in the Adopted UDP. The Housing Environmental Development Team in the Council is also working to incorporate renewable energy methods into Council developments.

OBJECTIVE: Promote and increase the use of renewable energy

Strategic Policies: **G13 and Strategic Policies K and N.**

Policies: **ENV16 and ENV23 and Policy 32a.**

Target 8C

In policy ENV23 the use of renewable energy is encouraged, in Policy 32a all major developments (above a threshold of 1000 sqm or 10 dwellings) are required to incorporate equipment for renewable power generation so as to provide at least 10% of their predicted energy requirements. The UDP Target Indicator for Strategic Policy K is that 75% of major developments meet the Policy 32a requirement of providing 10% of energy needs from renewable sources.

Core Output Indicator 8C (Core Output Indicator 9)

In 2004/2005 there were 3 developments with renewable energy capacity installed in Lambeth. At a sheltered housing development at Langholm Close in Clapham a new solar roof provides 100% of the energy needs for the Director of Housing Services landlord (21kw). At Vauxhall Cross Public Transport Interchange solar panels fitted on the roof provided 30 kw of energy. On St Matthews Estate solar panels mounted on a flat roof at Marchant House, a 12 unit key worker development, provide energy for the landlord (3.96 kw).

Conclusion

The requirement to incorporate renewable energy as set out in Policy 32a of the Revised Deposit Replacement UDP will only come into full force when it is adopted.

Therefore the Council hopes to improve on provision of renewable energy in future years, particularly in the private sector, as Policy 32a is fully implemented.

8.4 Minerals

Lambeth is a Minerals Planning Authority, however, at this time the Council does not have a policy relating to minerals planning. The borough is not known to contain mineral deposits.

Core Output Indicators (5a and 5b) applicable to this topic relate to the volume of aggregates produced in the borough. As there is no production in Lambeth, these indicators are not applicable.

Section 9 - Waste

Lambeth is a Waste Planning Authority, and a Waste Collection Authority. The Western Riverside Waste Authority (WRWA) is the Waste Disposal Authority for the area encompassing Lambeth, Wandsworth, Hammersmith and Fulham, and Kensington and Chelsea.

The volume of waste produced, and the subsequent management of waste are significant forces influencing the borough's and the City's ability to provide a sustainable community.

Lambeth has strong goals for the reduction of the amount of waste arising in the borough, and particularly the amount of municipal waste being disposed of through landfill and other non-sustainable methods. These goals must be achieved in conjunction with the WRWA and other constituent boroughs. Preferred means of management include minimisation, reuse, recycling, composting and energy recovery methods, in the order shown.

Lambeth's waste policy is described primarily in Strategic Policy G14 and Policies ENV24 and ENV25 in the Adopted UDP, and in Strategic Policy N and Policy 50 in the Revised Deposit Replacement UDP.

Indicators used in this Annual Monitoring Report relate to two main areas. These are the management methods for municipal waste (i.e. the distribution of waste to various appropriate and inappropriate methods of management), and the availability of sites and facilities for waste management (i.e. the allocation and use of sites within the borough for waste management and manufacturing facilities).

9.1 Management Methods for Waste

The Council aims to increase the level of municipal waste that is managed sustainably, thereby minimising the amount of waste disposed of through unsustainable methods. Methods of waste management are preferred by Lambeth in the following sequence: minimisation, reuse, recycling, composting, energy recovery, and disposal (e.g. landfill or incineration).

These goals are sought through the inclusion of policy relating to waste separation, storage and collection programs/facilities in new development, to encourage proper separation of waste. This is obviously enhanced by improving the borough's collection services and provision of community recycling mini-centres.

OBJECTIVE: Increase the amount of municipal waste managed through sustainable methods

Strategic Policies: **G14 and Strategic Policy N**
Policies: **ENV24 and ENV25 and Policy 50**

Target 9A

To shift the balance of waste management type to favour management methods in the following order: recycling, composting, energy recovery, disposal.

Indicator 9A (Core Output Indicator 6b)

The responsibility for municipal waste management is divided between Lambeth Council and the WRWA. The two tables below represent the apportionment of waste

to different management methods. Recycling and composting amounts are measured when waste is delivered to transfer stations, and accordingly can be attributed to each borough. Waste management by energy recovery methods and waste disposal are managed by the WRWA for all the constituent boroughs, so the amounts are shown as a total amount, and overall percentage of the waste managed.

Table 9.1: London Borough of Lambeth Waste Management by Type

	2002-03		2003-04		2004-05	
Waste Management Type	Tonnes	%	Tonnes	%	Tonnes	%
Recycling	-	-	-	10.17%	-	14.83%
Composting	-	-	-	0.34%	-	1.63%

Table 9.2: Western Riverside Waste Authority Waste Management by Type

	2002-03		2003-04		2004-05	
Waste Management Type	Tonnes	%	Tonnes	%	Tonnes	%
Energy Recovery	-	0.06%	-	0.06%	204	0.06%
Disposal	-	88.48%	-	85.17%	281480	82.73%

Conclusion

The Council's policies encourage development to provide for waste separation to increase the amount of waste that is managed sustainably. The Council has increased the amount of waste that it manages through recycling and composting significantly since last year. It is difficult to determine how much of this improvement is attributable to UDP policies, as other Council programs to reduce the amount of waste that is disposed of are likely to have had a greater impact on these figures. These programs, such as an increase in the amount of kerbside waste collection, and an increase in the number of recycling mini-centres available for public use, respond to national and London policies.

9.2 Availability of Sites and Facilities for Waste Management

Availability of sites and facilities for separation and treatment of waste is imperative in ensuring maximum waste management. Provision and protection of sites and facilities is the most significant role that the UDP can play.

These goals are sought through policies protecting existing facilities in the borough, as well as through allocation of Waste Management and Manufacturing areas in the Proposals Map of the Revised Deposit Replacement UDP.

OBJECTIVE: Provide adequate waste management sites to accommodate the borough's waste management needs

Strategic Policies: **G14 and Strategic Policy N**
Policies: **ENV24 and ENV25 and Policy 50**

Target 9B

Provide adequate waste management facilities.

Indicator 9B (Core Output Indicator 6a)

The borough currently accommodates five waste management facilities, in both public and private ownership. These include four (4) transfer stations, and one (1) civic amenity site. There have been no changes and are no known proposed changes to the capacity of any of these sites, or any additional sites.

The majority of waste management facilities dealing with the borough's waste are managed by the Western Riverside Waste Authority, and located outside the borough.

Conclusion

The Council aims to protect existing facilities where they are appropriately located, and provide for new facilities as the need for them arises. There has been no change in these facilities in recent years.

Section 10 - Implementation of the Local Development Scheme

This section of the Annual Monitoring Report assesses whether the Council has achieved its timetable and milestones set out in Local Development Scheme (March 2005) for the period April 2004 – March 2005.

10.1 Replacement Unitary Development Plan

Table 10.1 sets out the milestones in the Local Development Scheme for the production of the Replacement Unitary Development Plan and Proposals Map, and whether these have been met. The table clearly shows all milestones for the Replacement UDP and the Proposals Map have been met.

Table 10.1: Replacement Unitary Development Plan and Proposals Maps

Milestones	Milestone Dates in March 2005 LDS	Monitoring
Revised Deposit Consultation	July – August 2004	8 th July – 18 th August 2004
Consideration of representations	September – December 2004	September – December 2004
Pre-Inquiry Meeting	December 2004	8 th December 2004
Pre-Inquiry Changes Consultation	January 2005	20 th January – 2 nd March 2005
Public Inquiry	March – May 2005	8 th March – 20 th May 2005

10.2 Statement of Community Involvement and Annual Monitoring Report

The other documents set out in the Local Development Scheme (March 2005) are the Statement of Community Involvement and the Annual Monitoring Reports. However the timetable for their production, including all milestones, fall outside of the period covered by this Annual Monitoring Report.

10.3 Adoption of Development Plan Documents

The Council has not adopted any of the documents in the Local Development Scheme in the financial year 2004/2005. This is inline with timetable set out in the Local Development Scheme.

10.4 Saved Policies

There has been no change in the saved policies set out in paragraph 6 of the Local Development Scheme (March 2005). The saved Plan is therefore the Adopted Unitary Development Plan (1998).

10.5 Local Development Scheme (December 2005)

Following the end of the Public Inquiry the Council was informed by the Planning Inspectorate that the Inspectors Report on the Replacement Unitary Development Plan would be received by the Council in February 2006. As a result the Council has revisited its Local Development Scheme. The Local Development Scheme (December 2005) sets out the timetable and milestones for the Replacement UDP, Statement of Community Involvement and the Annual Monitoring Report. This will be monitored in the Annual Monitoring Report for 2005/2006.

Section 11 - Conclusion

This is the first Annual Monitoring Report that the Council has produced and as such attempts to set a baseline as a context for core output indicators and for developing local output indicators. It has highlighted the need for the Council to develop improved information and monitoring systems for future Annual Monitoring Reports.

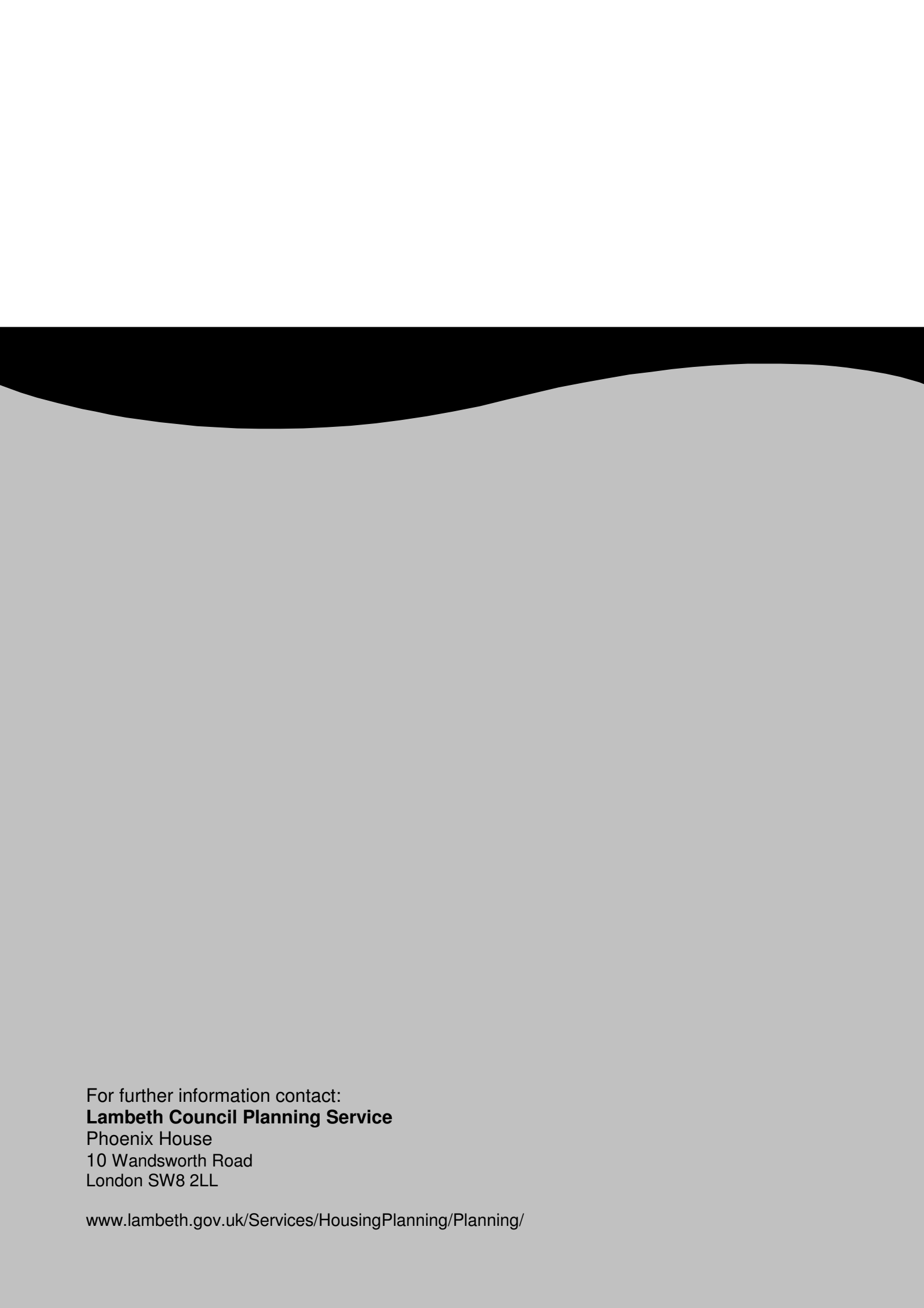
The content of future Annual Monitoring Reports will also be refined in the light of the receipt of the Inspectors Report on the Replacement UDP in February 2006 and the subsequent proposed Modifications. Following this it will be clearer as to the nature of the policies that will be retained in the Replacement UDP.

Appendix 1 - Core Output Indicators

Core Indicator Number	AMR Indicator Number	Explanation of Approach
1a – Business	4D	The Council is unable to respond to this COI at present. However, the Indicator 4D provides anecdotal evidence, with recent examples of employment development in the Borough, and refers to Indicator 4F which shows approved office floorspace in previous years (back to 1998) and the only completed office development in the 2004/2005 year. It is expected that a more detailed response, including reference to completed development will be provided in future years.
1b – Business	4E	This COI is quantified with anecdotal evidence. The Council does not have statistical data to measure this indicator, but is able to provide anecdotal information to respond. It is expected that a more detailed response, including reference to completed development will be provided in future years.
1c – Business	4C	This COI is quantified with reference to the ODPM figure (based on data from 1999 – 2002) obtained from the London Plan Annual Monitoring Report 1 (Mayor of London, January 2005).
1d – Business	4A	This COI is quantified with anecdotal evidence. The Council does not have statistical data to measure this indicator, but is able to provide anecdotal information to respond. It is expected that a more detailed response, including reference to completed development will be provided in future years.
1e – Business	4B	This COI is quantified with anecdotal evidence. The Council does not have statistical data to measure this indicator, but is able to provide anecdotal information to respond. It is expected that a more detailed response, including reference to completed development will be provided in future years.
1f – Business	4A	The Council is unable to respond to this COI at present. However, an indication can be given in this Report as to the level of employment land lost to residential development by using details of completed permissions granted in the 2004/2005 year that result in loss of B1, B2, and B8 floorspace to residential (source: London Development Database (GLA, 2005)). It is expected that a more detailed response, including reference to completed development will be provided in future years.
2a – Housing	3A	The Lambeth Housing Trajectory sets out gross additional dwellings from 1997/98 to 2004/05 and projected additional dwellings from 2005/06 to 2016/17. The annual net dwelling requirement, as set out in the Revised Deposit Replacement UDP, is also included.
2b – Housing	3B	This COI is equivalent to BVPI 106. The

		response to this indicator is sourced from the Council's <i>Best Value Performance Plan 2005/06</i> .
2c – Housing	3C	This COI is quantified with anecdotal evidence. The Council does not have available statistical data to measure this indicator, particularly in relation to completed development, but is able to provide anecdotal information to respond. It is expected that a more detailed response, including reference to completed development, will be provided in future years.
2d – Housing	3D	This COI is quantified with anecdotal evidence. The Council does not have available statistical data to measure this indicator, particularly in relation to completed development, but is able to provide anecdotal information to respond. It is expected that a more detailed response, including reference to completed development, will be provided in future years.
3a – Transport	6A	This COI is quantified with anecdotal evidence. The Council does not have available statistical data to measure this indicator, particularly in relation to completed development, but is able to provide anecdotal information to respond. It is expected that a more detailed response, including reference to completed development, will be provided in future years. Note: the Council's response to this indicator also refers to residential development.
3b – Transport	6B	The Council is unable to provide a response to this indicator. Instead, a Local Output Indicator has been included to generally measure public transport accessibility. The Council will attempt to address this indicator in the future.
4a – Local Services	4F and 5A	In terms of office, retail and leisure development, the Council does not have available statistical data to measure this indicator precisely. However the Council does have some emerging data on approved office developments over 1000sqm on which an indication can be given. It is expected that a more detailed response, including reference to completed development, will be provided in future years.
4b – Local Services	4G and 5B	In terms of office, retail and leisure development, the Council does not have available statistical data to measure this indicator precisely. These elements of this COI are therefore quantified with anecdotal evidence. It is expected that a more detailed response, including reference to completed development, will be provided in future years.
4c – Local Services	7A	This COI is quantified based on information provided from the Council Environment Department on sites submitted for Green Flag status and proposed number of sites to be submitted annually for Green Flag status.
5a – Minerals	N/A	The Council has not responded to this indicator as the borough is not known to contain mineral deposits and does not have a minerals planning policy.
5b – Minerals	N/A	The Council has not responded to this indicator

		as the borough is not known to contain mineral deposits and does not have a minerals planning policy.
6a – Waste	9B	This COI is equivalent to BVPI 82 (parts a, b, c & d). The response to this indicator is sourced from the Council's <i>Best Value Performance Plan 2005/06</i> , and the WRWA's <i>Best Value Performance Plan 2005/06</i> . Note: this indicator only includes municipal waste.
6b – Waste	9A	This COI is quantified with anecdotal evidence. The Council does not have available statistical data to measure this indicator, but is able to provide anecdotal information to respond. It is expected that a similar response will be provided in future years.
7 – Flood Protection and Water Quality	8A	This COI is quantified with anecdotal evidence. The Council does not have available statistical data to measure this indicator, but is able to provide anecdotal information to respond. It is expected that a similar response will be provided in future years.
	8B	This COI is equivalent to the Environment Agency's High Level Target 12 (HLT12) (amended to HLT5 from April 2005). The response to this indicator is sourced from the Environment Agency's <i>High Level Target 12: Development and Flood Risk 2003/04</i> , and with anecdotal evidence for the year 2004/05. Note: the EA's HLT12(5) report for 2004/05 has not yet been published.
8(i) and (ii) – Biodiversity	7Ci and 7Cii	This COI is quantified with both statistical and anecdotal evidence as it is not possible to quantify both of these indicators. The Council has not lost any of its Sites of Nature Conservation (0% change), although some have declined in quality (Lambeth Biodiversity Action Plan). However, the Council does not have statistical data to quantify priority species, due to the sensitivity of their protection or their movement. The Council can, nonetheless, to provide anecdotal information to respond, indicating whether the presence of such species has been recorded.
9 – Renewable Energy	8C	This COI looks to measure renewable energy capacity installed by type. The Council has been able to undertake the measurement of this indicator in terms of identifying developments with installed renewable energy, the renewable energy type and the amount of renewable energy in kilo watts.



For further information contact:
Lambeth Council Planning Service
Phoenix House
10 Wandsworth Road
London SW8 2LL

www.lambeth.gov.uk/Services/HousingPlanning/Planning/