

APPENDIX 2
SCHEDULE OF SA RECOMMENDATIONS (FEB 2013) AND COUNCIL RESPONSE

SA Recommendation	Section	Policy	Para.	Council response	Proposed change
[No recommendation number] That the design considerations are amended to ensure that school children do not have access to the emergency vehicle access and service/delivery area	7	Site 2		This point is already addressed under 'Design principles and key development considerations' – segregation from pedestrians includes from schoolchildren	No change.
<i>Note: For consistency with clause (b)(ii) the Council may wish to consider including reference to 'unless it is not technically feasible or viable' in relation to achieving BREEAM very good for refurbishments and conversions of non-residential development.</i>	9	EN4	EN4(iii)	Accepted.	Amend policy in line with recommendation.
<i>Note: Observation that clause (a) uses 'must' and clause (b) uses 'should'.</i>	6	ED13		Noted.	No change.
<i>Note: should places and neighbourhoods policies make reference to applicable site allocations in their area?</i>	11	All places and neighbourhoods policies		This is not considered to be necessary as the relevant site allocations are grouped by area after the place specific policies.	No change.
<i>Note: That guidance on building heights in the Northern Gateway, Miles Street and Pascal Place is provided in the policy (or is policy Q27 sufficient?).</i> <i>Note: It is unclear how the community development trust will be funded.</i>	11	PN2		Policy Q27 plus the Vauxhall Area SPD are considered sufficient. Funding of the community development trust is not a detailed matter to be addressed in the Local Plan.	No change.
<i>Note: The Council may wish to seek higher sustainable design and construction standards in strategic sites (e.g. Vauxhall) particularly where district heating networks are proposed or where significant development is occurring unless it can be demonstrated it would not be technically feasible or financially viable.</i>	9	EN4	EN4	Noted. The supporting text already refers to the VNEB OAPF Energy Masterplan.	No change.
<i>Note: There is some concern, particularly regarding cumulative impacts on biodiversity with the policy approach of policy D5 Enforcement specifically clause (a).</i>	4	D5		Where multiple, similar breaches of planning control are reported the wider effect (or cumulative impact) will be considered when	No change required

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				prioritising individual cases and considering formal action	
R 1: That the policy team review policy ED8, in particular the use of the word ‘adjoining’, ‘unacceptable impact’ and unacceptable harm’. Suggested review of part (b) of policy ED8 is provided below: ‘Night time and food and drink uses will not be supported where this would cause unacceptable harm on community safety or result in an unacceptable impact on the amenity of adjacent residential areas and sensitive uses as a result of...’	6	ED8		Accept in part. Clause (b) to be amended.	Policy ED8 (b) is amended to read: ‘Night time and food and drink uses will not be supported where this would cause unacceptable harm to community safety the amenity of neighbouring residential areas and sensitive uses as a result of...’
R 1: The word ‘adverse’ should be included in the first line of policy ED8: ...’ whilst making sure that the adverse impact on local amenity is minimised’. This acknowledges that impacts can also be positive.	6	ED8		Accepted. First line of Policy ED8 to be amended	Policy ED8, first line, is amended to read: ‘The Council wishes to support the evening and night time economy in its town centres whilst making sure that the any adverse impact on local amenity is minimised.’
R 10: The policy appears to only apply to new developments, and not major refurbishments or conversions, which would also benefit from urban design policy guidance.	10	Q8		It is loosely worded to cover all options.	
R 100: That clause b)(ii) includes an ‘and’ at the end to ensure that all parts of the clause are demonstrated in proposals.	10	Q11		Accept recommendation.	Add “and” between criteria (i) to (iii).
R 101: That the updated Supplementary Planning Document proposed for Residential Alterations and Extensions includes detailed guidance, in particularly with regards to clause (h)(i).	10	Q12		Accepted – the SPD will have to be re-visited in detail to ensure that it reflects the updated policy framework	

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R 102: Clarification is sought on whether 'new buildings' as provided for in clause (c) includes extensions.	10	Q15		This policy was intended to relate to stand-alone development in gardens.	Text amended.
R 103: Refuse storage areas can also impact adversely with regards to amenity and outlook (as well as noise and perhaps odour) on other uses such as school classrooms, health centre, hotels, places of worship as well as residential accommodation (as provided for in Q13(b)(iv)). It may be appropriate to include 'and other sensitive uses' to clause (b)(iv).	10	Q13		Q2 already covers this.	No change.
R 104: That the words 'policy compliant' are replaced with 'supported' in clause (a).	10	Q27		? The text already says 'supported'	?
R 105: The definition of 'tall buildings' could be improved as it is unclear whether tall buildings adjacent to the River Thames are limited to 25 metres in height, or whether 25 metres or more is considered a tall building on sites adjacent to the River Thames. It is also recommended that the policy team review the policy to ensure use of the word 'adjacent' is the intended implementation (i.e. to apply to sites around the River Thames rather than apply to sites abutting the River Thames).	10	Q27		Accept.	
R 106: It may be appropriate to include reference to specific locations in policy Q27 though, for example 'Proposals for tall buildings (25 metres...) in specific locations will be supported where...'	10	Q27		Text amended.	
R 107: Policy PN2 states 'development of this scale will be supported subject to...'. It is unclear whether this statement applies to just the Embankment developments or both the Embankment and Vauxhall Cross development. It is recommended that this is clarified by	11	PN2		The reference to "development of this scale" is considered to be clear and unambiguous. The reference to the Core Strategy	Amend as follows: "Development of this scale will be supported subject to the

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the policy team with the view of amending to, for example, 'Developments of these scales...'. The last part of this sentence should say Local Plan rather than core strategy.				needs to be amended.	relationship and impact of tall buildings on neighbouring communities and other related policies in this core strategy <u>Local Plan</u> ."
R 108: There seems to be some conflict between policies Q27 and PN2 as a building is considered tall at 25 metres by the river, but 30 metres elsewhere and yet policy PN2 effectively promotes much taller buildings in Vauxhall Cross and Embankment (which are adjacent to the River Thames). It is recommended this is reviewed by the policy team.	11	PN2		There is no conflict between the heights defined under policy Q27 (general London Plan definition of tall buildings) and the heights identified as appropriate in the Vauxhall Cross area under policy PN2. In the latter case, the heights are informed by the Vauxhall OAPF and are specific to this one location. However, this can be clarified in the supporting text to Q27	Add the following text to paragraph 10.95: "Parts of the Vauxhall, Albert Embankment, Waterloo and Brixton town centre and are considered to offer potential locations for tall buildings. <u>More clarification of this is provided in the Places and Neighbourhoods policies and relevant site allocations</u> . All proposals for tall buildings...."
R 109: The reference to policy S9 in PN3(a) should read Policy Q27.	11	PN3		The reference already refers to policy Q27.	No change.
R 11: That the policy team review whether provision of cycle storage design policy for non-residential developments, conversions, refurbishments is provided in the draft Local Plan.	10	Q14		Accept.	Change text.
R 110: that policy ED14 is reviewed to make provision for the protection of existing markets in general or from other proposals for the land including change of use, i.e. not just from retail developments	6	ED14		Accepted.	Amend Policy ED14 (b): " Retail Developments that would adversely affect existing covered or street markets will not be supported."
R 111: That a new bullet point is added to policy T5(c) ensuring that the visual amenity of the river itself is protected from new pier proposals, for example: 'the	8	T5		No change – proposals for new piers will be covered by design policies elsewhere in the Local	-

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visual amenity of the river itself.				Plan.	
R 112: That policy Q12(h)(i) is revisited by the policy team to verify whether side access should be required, and clarify the minimum distance for the gap between buildings. The use of the word 'and' makes it unclear whether a 1 metre gap between buildings maintains the value of the gap, or whether the value of the gap needs to be determined, and then an additional 1 metre minimum should be provided.	10	Q12		Accepted.	In the second sentence the word 'and' should be replaced with 'to'
R 113: That policies Q15(c) and Q12(f) and (h) are reviewed by the policy team in light of the observations above, particularly ensuring the policies are compatible and consistent in approach.	10	Q12		Accepted. This appears to be a drafting error.	(12f) should read <i>'full with rear extensions should be single storey'</i>
R 113: That policies Q15(c) and Q12(f) and (h) are reviewed by the policy team in light of the observations made in the SA, particularly ensuring the policies are compatible and consistent in approach.	10	Q15		See previous comment on 1(9f) where we propose the insertion of <i>'full width'</i>	No change.
R 114: That the second sentence of policy clause (c) is amended to: 'For these reasons new buildings and extensions and alterations requiring planning permissions will only be supported where.'	10	Q15		No change. We do not refer to the need for planning permission in other policies.	
R 115: That the Council consider whether protection of views to the Shard is appropriate.	10	Q26		Not accepted. The Shard is one of many 'landmark' tall buildings. There are numerous incidental views of it from across the city / Lambeth. We are unaware of any particularly impressive local views of it other than that already from Gipsy Hill. Therefore designation of specific views is not considered	

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R 116: The policy is about creating a new district centre at Vauxhall. The London Plan identifies Vauxhall as a future Central Activity Zone (CAZ) area. It is recommended there is use of consistent terminology to avoid ambiguity in expected future development	11	PN2		Creation of a district centre is a specific objective in the council's adopted Vauxhall Area SPD. The London Plan reference is to a future CAZ frontage (rather than area).	No change
R 117: It may be worth emphasising that buildings and architecture that reflect the cultural diversity, including equalities groups will be supported	11	PN2		This point is already made in policy Q6 and supporting paragraph 10.14. It is not considered necessary to repeat it in PN2.	No change.
R 118: The policy does not specifically identify locations where tall buildings within Brixton town centre would be acceptable, despite clauses (e) to (l) providing detail of the kind of development desired in this eight distinct areas. The forthcoming SPD may provide some guidance on this, but it may be appropriate for the policy team to review this policy in terms of preferred locations for tall buildings.	11	PN3		Specific sites appropriate for tall buildings have been identified in the Brixton Area SPD, informed by the Brixton Tall Buildings evidence base study. This is reflected in the Brixton section under Places and Neighbourhoods in the Local Plan. Proposals on other sites will be assessed against policy Q27.	No change.
R 119: that the policy team review clause (i), specifically the use of word 'frontages' in light of policy Q23.	11	PN3		There is no inconsistency between the use of the word 'frontages' in PN3(i) and the approach to façade development in policy Q23.	No change.
R 12: That the policy team review policy PN5 in respect to its reference to improved vehicle movements.	11	PN5		It is considered that the reference to improved vehicle movements in policy PN5 is appropriate and is not incompatible with prioritisation of pedestrian movement.	No change
R 120: That policy PN4 for Streatham is reviewed in terms of building height that allows a situation to arise where a six storey building in Streatham Central may detract from the purpose of the landmark buildings (i.e. destination) in Streatham Hill and Streatham South should these landmark buildings be four to six storeys in	11	PN4		Streatham High Road is long and the different areas have distinctive characters. It is therefore unlikely that development within one area would detract from the impact of development in the others.	No change

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height, or indeed if they are not at least a few storeys taller than a six storey building proposed for Streatham Central.					
R 121: that the allocation is reviewed with respect to the provision of building height		Site 8		This site is not considered appropriate for tall buildings due to heritage sensitivities; hence no reference to tall buildings was made in the draft site allocation. However, a clarification of this point would be helpful.	Insert the following wording to the fifth bullet point under 'Development considerations': " relates in bulk and height to the adjacent townscape taking into account the height, massing and scale of neighbouring buildings and the historic built form of the area; <u>the heritage sensitivity of the site makes it inappropriate for tall building development;</u>
R 122: that the allocation is reviewed with respect to building height – design considerations states that building height must not exceed 150m with buildings to the east of the viaduct reducing in scale to relate to existing residential buildings. The whole site is east of the viaduct. Policy PN2 states that 150m buildings are appropriate in and around Vauxhall Cross. This site is at the furthestmost southern part of the Miles Street character area and therefore a lower maximum building height (than 150m) may be appropriate for the western part of the site, with heights reducing in scale towards the east. The draft SPD for Vauxhall identifies this area as an 'area of tall building sensitivity'.		Site 10		Accepted	Replace the wording on building heights with the following text: "Building heights need to reflect the transitional location of the site, mediating between the taller buildings in Vauxhall Cross and the low rise residential development to the south."
R 123: That clause (a)(iv) is reviewed in terms of accessibility to public transport, shops etc with the view of perhaps providing guidance in terms of PTAL levels in the policy or supporting text.	5	H10	H10(b)(iv)	Any sites that come forward for use as Gypsy and Traveller accommodation provision would be assessed on a case by case basis, having regard to the PTAL level of the site.	No change.

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R 123: That clause (a)(iv) is reviewed in terms of accessibility to public transport, shops etc with the view of perhaps providing guidance in terms of PTAL levels in the policy or supporting text.	5	H8	H8(a)(iv)	The policy requires the accessibility of new accommodation to be appropriate to the needs of the intended occupiers – each proposal would be assessed accordingly, having regard to the PTAL level of the site.	No change.
R 123: That clause (a)(iv) is reviewed in terms of accessibility to public transport, shops etc with the view of perhaps providing guidance in terms of PTAL levels in the policy or supporting text.	5	H9	H9(a)(iv)	The policy requires the accessibility of new accommodation to be appropriate to the needs of the intended occupiers – each proposal would be assessed accordingly, having regard to the PTAL level of the site.	No change.
R 124: That the policy team consider incorporating public transport accessibility guidance or standards into policy S2 or its supporting text.	7	S2	7.12	Noted.	Amend paragraph 7.12 as follows: “New community premises should be conveniently located for those who use them, <u>easily reached on foot, bicycle or public transport, and fully accessible....</u> ”
R 125: Include consideration of ‘desire lines’. For example, ‘In considering development proposals, Lambeth will aim to secure an improved environment for pedestrian, with particular regard to their safety, convenience and directness of movements, including footway widening, provision of new routes and desire lines.’	8	T2		Agree	Amend first sentence of T2c to read: ‘In considering development proposals, Lambeth will aim to secure an improved environment for pedestrian, with particular regard to their safety, convenience and directness of movements, including footway widening, provision of new routes <u>and desire lines.</u> ’
R 126: Include desire lines, for example by adding to the	8	T4		Agree	Add to end of T4(d)(ii): ‘and

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end of T4(d)(ii): 'and consideration of desire lines'.					consideration of desire lines'.
R 127: Consider including the following to policy T6(a): 'traffic generation', 'impact on traffic flows', and 'local parking'.	8	T6		Agree	Replace T6a bullet point 2 with: "traffic generation, impact on traffic flows and local parking".
R 128: That the Brixton policy makes provision to reduce the dominance of road traffic.	11	PN3		Sections (b), (c), (e), (f), (i) of the policy already address the need to improve facilities for pedestrians, cyclists and users of public transport. Significant highway improvement works have already taken place in Brixton town centre to help address the dominance of road traffic.	No change.
R 129: That the policy team revisit the wording of policies PN4 and PN8 regarding 'car parking appropriate to the nature and scale of the development will be sought' with the aim of softening the policy so that it does not suggest that car parking will always be sought.	11	PN4, PN7		See the response to R13 above. NB the policy number for West Norwood/Tulse Hill in PN7, not PN8.	No change
R 13: That the policy team review the necessity to actively seek car parking in Streatham and West Norwood and Tulse Hill areas, over and above the provision of policy T7.	11	PN4, PN7		The policies do not seek a level of car parking in excess of the maximum levels set out in policy T7 (i.e. London Plan maximum parking standards). Instead they acknowledge the need for a level of car parking appropriate to the nature and scale of development. It is considered important to retain this statement in the policies in order to acknowledge particular issues with car parking in these town centres.	No change
R 130: That 'biodiversity' is added as a bullet point to	4	D4	(b)	Accepted.	Add bullet point to Policy D4 (b).

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clause (b)					
R 131: That clause (b)(ii) is amended with a new bullet point so that communal gardens should also ‘make a positive contribution to biodiversity’.	5	H5	H5(b)(ii)	This is stated in Policy Q10 (iii), which relates to landscaping.	No change.
R 132: That clause (a) incorporates provision of gardens as follows: ‘ <i>Development which would involve the loss of existing public or private open space, including parks, allotments, cemeteries/burial space, gardens and open air sports and recreational space...</i> ’.	9	EN1		For clarity, part (a) has now been amended and the examples of types of open space deleted. Open space is defined in para. 9.1.	No change.
R 133: Buildings permitted under policy EN1(a)(iii) should include a living roof or wall given their location in an open space environment and it may be appropriate to include this as supporting text to the clause.	9	EN1		Provision for living roofs and walls is covered in policy EN4.	No change.
R 134: That clause (b) of policy EN1 is amended as follows: ‘Preventing development which would result in loss, reduction in area or harm to nature conservation or biodiversity values of an open space including any designated or proposed Sites of Importance for Nature Conservation (SINC) unless adequate mitigation or compensatory measures are included appropriate to the values involved. Development proposals should wherever possible protect, enhance, create or manage biodiversity in accordance with the Borough’s Biodiversity Action Plan (BAP) and the Mayor’s Biodiversity Strategy.’	9	EN1		Accepted.	Amend Policy EN1 (b).
R 135: That clause (c) is rewritten as follows: ‘all development proposals should incorporate living roofs and wall where feasible.’ The policy should also require a maintenance plan.	9	EN4	EN4(c)	The policy wording provides a safeguard in the event that a living roof / wall is proposed in a particularly sensitive location where it might not be considered appropriate (for example to a	Add to EN4(c): “Proposals should include a maintenance plan for the lifetime of the development.” Add to supporting text: “Maintenance plans should be appropriate to the

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				listed building). Accept recommendation regarding requiring a maintenance plan.	level of biodiversity sought.”
R 136: that supporting text of policy Q5 acknowledge possible biodiversity value of overgrown vegetation on ‘untidy’ sites or species presence in dilapidated or vacant buildings.	10	Q5		N/A Policy Q5 deleted.	
R 137: that policy team review appropriateness of reference to living roofs in policy Q12, particularly clauses (m) – (o).	10	Q12		Accepted.	<i>‘Living and green roofs will be supported’</i>
R 138: that clause (b) (iii) is rewritten to acknowledge gardens as a priority habitat in the Borough: ‘not accept cycle storage that compromises the visual amenity or biodiversity of front gardens / forecourts.	10	Q14		Not sure how much contribution front gardens make to priority habitats (larger rear gardens, away from noise and traffic are likely to be most important. Therefore reluctant to introduce it here.	No change
R 139: To further strengthen policy Q15 with respect to SA Objective 10, clause (a) of the policy could be amended as follows: ‘...and will resist proposals which would result in the loss of biodiversity, soft landscaping, permeable drainage or openness.’	10	Q15		Accept.	
R 14: The policy should be amended to include an improved environment for cyclists as well as pedestrians.	11	PN6		Noted	Amend the policy wording as follows: “...This will be achieved through: safeguarding and encouraging retail uses; enhancing its historic environment; encouraging commercial, civic and other employment uses; developing and

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					enhancing its sense of place by improvement to traffic and environmental conditions for pedestrians <u>and cyclists</u> ; and creation public open space and linkages through the area....”
R 14: The policy should be amended to include an improved environment for cyclists as well as pedestrians.	11	PN8		Noted	Amend section (d) of the policy as follows: “Seeking the improvement of traffic and environmental conditions for pedestrians <u>and cyclists</u> , the quality of the public realm...”
R 140: The word ‘proposed’ in the first line of policy Q22 needs to be replaced with ‘permitted’.	10	Q22		Not accepted. The existing text - ‘proposals’ - is correct.	
R 141: That the word ‘built’ is removed from supporting text paragraph 10.87 of policy Q24.	10	Q24		Accepted.	As requested.
R 142: That the policy team consider specific provision of living roofs and walls in appropriate places and neighbourhood policies (particularly PN1, PN2, PN3, PN4, and PN8).	11	All places and neighbourhood policies		Provision for living roofs and walls is covered in policy EN4 and does not need to be repeated in the place specific policies.	No change.
R 143: that the policy team review all site allocations and incorporate living walls or roofs as design principles and key development considerations, particularly for those sites owned by the Council.		Site Allocations		Noted	<i>Insert specific references in relevant site allocations.</i>
R 144: Amend as follows: (a) All major development proposals will be expected to deliver and exceed carbon dioxide emission reduction targets. A detailed energy assessment should be	9	EN3	EN3(a) and (e)	The targets in London Plan Policy 5.2 are expressed as minimum improvements over the Target Emission Rate outlined in national	No change.

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submitted that outlines how the targets will be met within the framework of the London Plan energy hierarchy. The assessment should also demonstrate how ongoing management will allow occupants to continually reduce their carbon emissions. (e) To ensure that the Council can properly monitor the effectiveness of renewable and low carbon energy measures <u>as demonstrated in the energy assessment</u> , major developments will be expected to install appropriate equipment for post construction monitoring.'				Building Regulations – therefore it is not considered necessary to state in Policy EN3 that these are minimum standards. Regarding (e), the current wording, together with explanatory text at para. 9.20, is considered to convey the intended meaning clearly.	
R 145: policy provision to ensure a district heating network is delivered in Vauxhall or at least make reference to the Energy Masterplan for VNEB.	11	PN2		Accepted	Add a reference to the VNEB Energy Masterplan to supporting and policy text.
R 146: That the policy team review the necessity of referring to carbon emission reductions and climate change adaptation for some areas and not others.	11	All places and neighbourhoods policies		Low carbon and renewable energy are addressed in policy EN3; and sustainable design and construction in policy EN4. There is no need to repeat the content of these policies in every place specific policy.	No change.
R 147: where places and neighbourhoods policies encourage or seek provision of district heating networks (for example Brixton, Vauxhall, West Norwood) it is recommended that site allocations within these areas also recognise this and expect development to link or create such heating networks / accommodate the necessary Energy Centre.		Site Allocations		Noted.	<i>Add references to connection to district heating networks to relevant site allocations.</i>
R 148: taking into account the level of development proposed for each site, it is recommended that the policy team outline specific low carbon technologies and climate change mitigation and adaption measures that will be expected as part of the site allocation. The quantum of development proposed represents a		Site Allocations		Noted	<i>Insert specific references in relevant site allocations.</i>

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significant opportunity to increase energy performance of each area (particularly major centres), and it is therefore important to maximise opportunities by ensuring the energy performance of new development is of the highest standard. For example, all mixed use developments should incorporate use of CHP as a minimum and ideally be part of a wider district heating network. There should also be guidance for each site on the amount and type of landscaping and green open space expected. Living roofs and walls should be expected on appropriate sites.					
R 149: include recognition of the identified flood risk for Waterloo and Vauxhall areas, and preferably any appropriate design guidance preferred for these areas.	11	PN1, PN2		Noted	Insert a reference in the supporting text of policies PN1 and PN2 to flood risk, and a cross reference to policy EN5.
R 15: That the policy applies to major refurbishments	5	H5	H5(a) and (b) and 5.25	In many cases refurbishment works do not require planning permission. In instances where planning permission is required, it would seem unduly onerous to apply the policy requirements where no new units are being created.	No change.
R 150: That permeable surfaces provided for all appropriate public realm improvements / new square and public spaces for all places and neighbourhoods policies.	11	All places and neighbourhood policies		This is already addressed in policies EN5 and EN6 (flood risk and sustainable drainage systems and water management) and there is no need to repeat it in the place specific policies.	No change.
R 151: that policy or supporting text is clear that the Construction Logistics Plan includes options for reducing, segregating, storing and removing waste from site.	8	T8		On site waste management is covered by policy Q13	Check Q13 meets this comment.

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R 152: That on-site waste management facilities are incorporated into all major development proposals.	9	EN7		This is already stated in paragraph (c) of the policy.	No change.
R 153: Amend supporting text paragraph 9.56 to ensure it is consistent with policy T8 Servicing (i.e. policy T8 does not explicitly refer to Site Waste Management Plans).	9	EN7	9.57	Presumably the comment relates to paragraph 9.57 rather than 9.56. Comment noted: the reference should be to 'delivery and servicing plans'	Amend paragraph 9.57 to read "...policy T8 Servicing in relation to site waste management <u>delivery and servicing plans</u> ; and policy..."
R 154: consider requiring Site Waste Management Plans for all developments / planning applications.	9	EN7		Site Waste Management Plans became mandatory in April 2008 for all construction projects with an estimated cost greater than £300,000 (see Lambeth's Sustainable Design and Construction SPD July 2008). A reference to the SPD could be added to paragraph 9.57	Add the following wording to paragraph 9.57: "...storage. <u>See also the council's Sustainable Design and Construction SPD (to be updated).</u> "
R 155: incorporate provision in Local Plan for composting areas in new residential developments.	9	EN7		Composting facilities are a type of on-site waste management, which is already addressed in paragraph (c) of the policy. A specific reference to composting can be added to paragraph 9.56. This can be addressed further in the update of the Sustainable Design and Construction SPD.	Add a reference to composting to Section (a) (i) of the policy and to paragraph 9.56. Include composting in the update of the Sustainable Design and Construction SPD.
R 156: Ensure that refurbishments, extensions, alterations and change of use of provided for in policy Q13.	10	Q13		No accepted. The wording is clear that the aspiration of Q13(a) is for ' <i>all development</i> '	
R 157: That the policy team review the places and	11	All places and		Sustainable waste management is	No change.

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neighbourhoods policies, particularly PN1 – PN4, PN8, PN10 with the view of incorporating guidance on how waste is to be managed given the quantum of redevelopment proposed. For example, it may be appropriate for some areas, or even specific housing estate regeneration project to include in-ground or free standing refuse storage. The policy team should also consider the implications of not making explicit provision of waste management in some policies when provision is included for Brixton in policy PN3.		neighbourhoods policies		addressed in policy EN7 and does not need to be repeated in the place specific policies. Waste is specifically mentioned in the Brixton policy (PN3) because there are Brixton specific strategies for energy and waste management.	
R 158: that the policy team review wording to ensure that Oval House Theatre will be reused in future.	11	PN8		Noted. The wording “as necessary” is considered to be unclear, adding little to the meaning of the sentence.	Amend section (b) of the policy as follows: “Seeking to improve the quality and extent of shopping and other appropriate town centre uses within the centre, including appropriate re-use of the Oval House Theatre as necessary , as well as sites in the wider area, to improve the range and quality of housing and employment....”
R 159: The policy team may wish to review policy PN10 Loughborough Junction on how it is envisaged that existing KIBA sites and other sites used for industrial purposes, including waste management like recycling centres will be included in the proposal to improve Loughborough Junction.	11	PN10		This issue is addressed in the Loughborough Junction Framework Plan, the content of which is reflected in policy PN10.	No change.
R 16: That the policy provides <i>at least</i> 10 percent units that are wheelchair accessible.	5	H5	H5(a)(ii) and 5.25	The policy reflects the wording in the London Plan (ref. Policy 3.8 Housing Choice and para. 3.48).	No change.
R 160: That electric cars are identified as distinct from private cars on the road hierarchy of policy T1.	8	T1		While electric cars can contribute to improving air quality in	No change

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
				Lambeth, the road hierarchy also reflects use of space and road danger. Electric cars have a more sustainable fuel source but still take up space and are a source of road danger in the same way as conventional cars.	
R 161: The policy team consider including environmental quality as a consideration in proposing new taxi ranks under policy T9(a).	8	T9		This is covered by T9b.	-
R 162: Clause (b) could be amended from 'improve vehicle movement' to 'reduce the dominance of traffic' to better align with supporting text and SA Objective 14.	11	PN5		The wording "improve vehicle movement" is considered to be more specific that "reduce the dominance of traffic", and therefore more appropriate in the specific context of describing the change required in Clapham town centre. Improvement of vehicle movements in this location will contribute to the objective of reducing the dominance of traffic.	No change
R 163: that the policy team consider incorporating details on the provision of trees in particular, (but also vegetation generally and living roofs and walls) appropriate for each town centre.	11	All places and neighbourhood policies		Trees are addressed in policies Q7 (urban design: public realm), Q10 (landscaping) and Q11 (trees). There is no need to repeat the content of these policies in the place specific policies.	No change.
R 164: that the policy team review the necessity of car parking provision in Brixton given the existing provision in place and the exceptional public transport accessibility of the town centre. If additional car parking is required, the policy should be guidance on the maximum level acceptable.	11	PN3		Specific references to provision of town centre car parking in the policy arise from area specific consultation findings (Brixton Area SPD). Maximum parking levels for new development are defined in the	No change

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
				London Plan, as set out in draft Local Plan policy T7.	
R 165: That policy PN3 is reviewed in terms of explicit student housing provision given the proposed expansion of Lambeth College.	11	PN3		It is not considered that the proposed expansion of Lambeth College would result in increased demand for student accommodation, as it mostly caters to students already living in the area.	No change.
R 166: That policies ED2 (d), ED3(b) ED7(c) and ED11(a) are amended to ensure evidence is submitted that demonstrates active and continuous marketing evidence over a one year period, and that the site is marketed at an independently assessed market value price by a agent that specialises in commercial land sales.	6	ED11		Accepted.	Reference to active and continuous marketing and using an agreed realistic valuation of the premises will be inserted into the new policy dealing with public houses. Similar wording will be added to the policy dealing with local centres and dispersed local shops.
R 166: That policies ED2 (d), ED3(b) ED7(c) and ED11(a) are amended to ensure evidence is submitted that demonstrates active and continuous marketing evidence over a one year period, and that the site is marketed at an independently assessed market value price by a agent that specialises in commercial land sales.	6	ED2&ED3		This is already clear in the introduction to the ED policies.	No change.
R 166: That policies ED2 (d), ED3(b) ED7(c) and ED11(a) are amended to ensure evidence is submitted that demonstrates active and continuous marketing evidence over a one year period, and that the site is marketed at an independently assessed market value price by a agent that specialises in commercial land sales.	6	ED7		Accepted.	Reference to active and continuous marketing and to the use of an independently assessed market value price will be inserted into these policies
R 168: that the policy team review Local Plan policies and supporting text in light of Local Services Planning	6	ED11		The Bill failed to complete its passage through Parliament	No change.

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
Bill HC58.				before the end of the session. This means the Bill will make no further progress.	
R 169: That new visitor accommodation is encouraged in town centres only, rather than 'elsewhere where PTAL is good or above'.	6	ED13		Smaller scale visitor accommodation (e.g. B&B's) would be accepted outside town centres where public transport accessibility is 'Good' or above.	No change.
R 17: That the last word of policy H5 (b) (ii) is amended from 'space' to 'garden' and supporting text is amended to reflect this. Alternatively, the term 'communal gardens' in (b) (ii) could be amended to 'communal space'.	5	H5	H5(b)(ii)	Accepted.	Amend the term "communal gardens" under Policy H5 (b) (ii) to "communal amenity space".
R 170: that the policy team consider including hotel provision in the Brixton town centre policy.	11	PN3		Noted	Add a reference to section (a) of the policy
R 171: that clause (c) is reviewed to allow for change of use from work-live to residential, subject to marketing evidence.	6	ED4		This was intentional to set out a clear deterrent. Historically changes of use from work-live have resulted in an incremental loss of employment uses to residential.	
R 172: that the policy team review clause (ii) and determine the appropriateness of encouraging re-use of dilapidated / derelict buildings and spaces.	10	Q5		N/A Policy Q5 deleted.	
R 173: the policy team consider amending the policy so that demolition is only permissible where it has been demonstrated that the building cannot be viably re-used or refurbished for functional / intended use.	10	Q23		No accepted. This would not accord with established best practice – we only seek to retain positive contribution buildings. Their demolition is covered in the NPPF so not duplicated here.	
R 174: Telecommunications should not be sited in a way that makes them vulnerable to flood damage.	8	T10		Agreed	

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
R 18: Remove the words 'Outside of town centres' and replace 'minimise' with 'contribute to reducing' in the last line of paragraph 6.29. Reconsider use of term 'hot food' with 'fast food' to include foods such as donuts, ice-cream. Provide enforceable definition of fast food.	6	ED9		Point noted. However the policy applies to all uses falling within the A5 use class category. The use classes order describes A5 uses as "hot food takeaways" and for consistency this term should be retained. Using the term "fast food" would be open to interpretation – we could not (and would not wish to) control the sale of particular food items (e.g. donuts and ice-creams) from A1 or A3 premises.	No change.
R 19: reference to Policy S1(a) in paragraph 7.14 should read S2(a).	7	S2	7.14	Accepted, this is an error.	Amend wording to read "S2(a)" as recommended.
R 2: Provide definition for 'sensitive uses' in the supporting text of policy ED8.	6	ED8		Accepted. Definition to be inserted into supporting text.	Sensitive uses include nursing homes, old people's accommodation, hospitals, hospices and places of worship.
R 20: amend policy S2 to ensure new facilities address identified needs spatially, especially regarding health inequalities.	7	S2		It is for infrastructure providers, through their strategies, to ensure that an appropriate spatial distribution of services across the borough is achieved. Paragraph 7.11 states that new or improved premises to provide a community service should make reference to the relevant infrastructure strategy listed in Annex 2.	No change.
R 21: Clause (c) add the word 'safe' to the last sentence: ...'and provide safe, direct and attractive routes to accommodate these flows'.	8	T2		Agree	Amend T2a to to read: "development proposals should assess existing and predicted

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
					pedestrian flows and make <u>safe</u> , direct and attractive routes to accommodate these flows.”
R 22: Clause (c), include provision of secure <u>and covered</u> cycle parking facilities; and include the words ‘appropriate to the number of cycle parking provided’ to the end of the last sentence.	8	T3		Agree	Amend T3c: “In considering development proposals, Lambeth will require the provision of secure <u>and covered</u> cycle parking facilities.....and lockers for cyclists <u>appropriate to the number of cycle parking spaces provided.</u> ”
R 23: Paragraph 8.11 - include reference to students with regards to cycle parking spaces.	8	T3		Reference not necessary – policy requires cycle parking provision appropriate to proposed use.	-
R 24: That the policy team review policy T5 to ensure that any new development / addition to the riverside walk results in a continuous route along the river (joined with existing riverside walkway). Also the policy should be clear that riverside walk would need to be wheelchair accessible from the development, as well as existing riverside walk and adjoining street pattern.	8	T5		Agree	Amend para 8.19 to read “The Council will secure the provision of a continuous riverside walk and will secure necessary connecting routes through planning obligations.”
R 25: Clarification that all bullet points of policy T6 clause (b) should be met. Further, it is recommended that ‘for all users’ is added to the end of the second bullet point.	8	T6		R5 above clarifies that all parts of T6b must be met. It should be taken as read that safety of all users will be considered.	-
R 26: The policy team review policy EN2 to more robustly provide for community gardens / food growing areas in major residential developments (for example through use of the word ‘should’ rather than ‘encourage’); and allow provision of food growing areas in non-residential developments where appropriate.	9	EN2	EN2(b)	Accepted in part.	Amend Policy EN2 as follows: “(b) The incorporation of community gardens and innovative spaces for growing food, including green roofs, will be encouraged and supported in major new residential developments where compatible with residential amenity.”

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
R 27: Review policy EN3 to provide stronger emphasis on provision of renewable energy in developments.	9	EN3	EN3	The supporting text to Policy EN3 states that London Plan targets for carbon dioxide emissions reduction will be applied. This includes the target set out in Policy 5.7 relating to renewable energy.	No change.
R 28: Amend policy to include provision of CEEQUAL 'excellent' rating for infrastructure, public realm and open spaces.	9	EN4	EN4(a)	Accept in part.	Add to supporting text, "For infrastructure, public realm and open space developments, schemes will be encouraged to reach a Civil Engineering Environmental Quality Assessment rating of 'Excellent'."
R 29: Amend the second sentence of clause (b) so that applications for 'all new developments, including refurbishments, conversions and change of use' are accompanied by CSH or BREEAM pre-assessment.	9	EN4	EN4(b)	Part (ii) of the policy relates only to conversions, extensions and refurbishments – not "all new developments". Other types of development are covered by parts (i) and (iii) of the policy.	No change.
R 3: That the word 'or' is added to the end of clauses (i), (ii) and (iii).	6	ED10		Accepted. Policy ED10 will be amended accordingly.	The word 'or' has been added to the end of clauses (i), (ii) and (iii).
R 30: After April 2014 dwellings should achieve a high CSH Level 4 rating which should be defined as a minimum as the mid point between levels 4 and 5 (i.e. 76 percentage points).	9	EN4	EN4(b)(i)	Accepted.	Amend policy in line with recommendation.
R 31: Policy EN4 clause (b)(ii) should be amended to incorporate incremental change for higher standards, for example by requiring BREEAM Excellent by 2016.	9	EN4	EN4(b)(ii)-(iii)	Accepted.	Require BREEAM 'Excellent' subject to viability / feasibility and if not 'Very Good' with a minimum score of 63%.
R 32: That targets are set for energy and water efficiency when developments cannot achieve BREEAM Domestic Refurbishment standard of 'very good'.	9	EN4	EN4(ii)	Accept in part. The energy standards set out in Policy EN3 would apply – it is not	Include a cross-reference to London Plan Policy 5.15 at para. 9.25: "New dwellings should be

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
				considered necessary to include a further energy target in this policy.	designed to ensure that a maximum of 105 litres of water is consumed per person per day, in accordance with London Plan policy.”
R 33: Policy EN4 clause (b)(iii) should be split so that different standards apply to new build non-residential developments (i.e. ‘Excellent’ rating) and refurbishment and conversion of existing non residential buildings (‘Very Good’ rating to start with incremental change to higher standards for later stages on the plan period).	9	EN4	EN4(b)(iii)	Accept in part.	Require BREEAM ‘Excellent’ subject to viability / feasibility and if not ‘Very Good’ with a minimum score of 63%.
R 34: That the policy team carefully consider policy implications of use of words ‘must’ and ‘should’.	9	EN4	EN4	Noted.	
R 35: Review EN4(c) in light of supporting text paragraph 9.24. Either remove the words ‘and appropriate to the character and context of the development’ from the policy, or include guidance on what this means and when this might apply in the supporting text.	9	EN4	EN4(c)	Accepted.	Add explanatory text to para. 9.24: “Where applications affect heritage buildings or are sited in particularly sensitive locations, consideration will be given to whether the design is appropriate to the character and context of the development, having regard to other policies in this plan.”
R 36: That clauses (ii) and (iii) protect both amenity of the development proposed and that of existing adjacent properties. Specifically clause (ii) should be amended to ‘an acceptable standard of privacy results...’ or alternatively, ‘acceptable standards of privacy are provided...’ and clause (iii) should be amended to ‘an adequate outlook results...’ or alternatively ‘adequate outlooks are provided...’.	10	Q2		No objection.	Accepted.
R 37: Review the purpose and intent of the word ‘existing’ in clause (iv). It should be clear that the clause applies to vacant adjoining properties also.	10	Q2		The wording is ambiguous. The reference to vacant premise is unnecessary.	‘Existing’ should be best replaced by <i>‘the host building’</i> .

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
R 38: Clause (vi) is amended to read: ‘...does not cause unacceptable noise or disturbance through its operation.’	10	Q2		An amendment can be considered in order to avoid misinterpretation.	Use text noise ‘ and / or ’ disturbance
R 39: clause (iii) is amended as follows: maintain and create publicly accessible spaces and routes along the river that provide for a continuous riverside walkway.	10	Q25		Accepted.	As requested.
R 4: Incorporation of safety aspect to Policy T5(c) as follows: ‘Proposals must be in keeping and appropriate to their context and include arrangements for <u>safe</u> maintenance, management <u>and access</u> which will be secured through planning obligations’	8	T5		Agree	Amend T5c: ‘Proposals must be in keeping and appropriate to their context and include arrangements for <u>safe</u> maintenance, management <u>and access</u> which will be secured through planning obligations’
R 40: Policy may benefit from making specific provision for healthcare in this area (in addition to Annex 2).	11	PN2		Accepted	Insert a reference in the penultimate paragraph of the policy.
R 41: Policy PN5 – review supporting text to provide explicit meaning for clause (b) particularly with reference to ‘improve vehicle movements’.	11	PN5		The context for the reference in paragraph (b) is already explained in supporting text paragraph 11.52, which refers to the partnership between the council and Transport for London specifically addressing the programme of public realm improvements in Clapham Old Town. Reference is already made to reducing the dominance of traffic in the seventh line of the policy.	No change.
R 43: Clarify whether the 30m2 of external amenity space for new houses should be private or not.	5	H5	H5(b)(i)	For clarity, it is recommended that the policy is re-worded in line with guidance set out in the London	Remove “Family housing should normally have direct access to a private garden” from (b)(i). Add:

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
				Plan Housing SPG.	"(b)(iii) Houses, ground floor flats, and family sized units should preferably have direct access to a private garden".
R 44: Amend clause (a) (v) as follows 'Is located in an area with good public transport access (<i>PTAL of 4 or more</i>), and <i>easy</i> access to local shops, workplaces, services and community facilities'.	5	H7	H7(a)(v)	Accepted.	Amend Policy H7(a)(v) as follows: "Is located in an area with good public transport access (<u>PTAL of 4 or more</u>), and <u>easy</u> access to local shops, workplaces, services and community facilities".
R 45: Amend clause (b) (ii) so that existing accommodation is re-provided...'on site or elsewhere within the Borough'.	5	H8	H8(b)(ii)	Accepted.	Amend Policy H8(b)(ii) as follows: "the existing accommodation will be adequately re-provided to an equivalent or better standard on site or elsewhere <u>in the borough.</u> "
R 45: Amend clause (b) (iii) so that existing accommodation is re-provided...'on site or elsewhere within the Borough'.	5	H9		Accepted.	Amend Policy H8(b)(ii) as follows: "the existing accommodation will be adequately re-provided to an equivalent or better standard on site or elsewhere <u>in the borough.</u> "
R 46: supporting text – provide guidance on how 'reasonable distance' would be defined.	5	H10	H10(b)(iv)	Accepted.	Add to supporting text: "A reasonable walking distance is considered to be around 400 metres, which is approximately 10 minutes' walk. This will be assessed based on a case by case basis and in consultation with the Gypsy and Traveller community."
R 47: That clause (a)(i) is amended as follows: 'the site or buildings are appropriate for their intended use <i>and are fully inclusive</i> and accessible to the community;'. '	7	S2		The wording of this clause relates to sites and buildings and the word 'inclusive' is not considered appropriate or relevant in this regard. Reference is already made to sites and buildings being	No change.

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
				"accessible to the community" and this is considered sufficient to convey the intended meaning.	
R 48: That the policy team review the benefit of cross referencing policy S3(b) with policy H8.	7	S3		A cross reference is not considered necessary. The policy approach is consistent.	No change.
R 49: Clause (a)(iii) - insert the word 'public' before toilets.	9	EN1		Not all open space is publicly accessible, for example private sports facilities, school playgrounds etc.	No change.
R 5: Policy T6(b) add the word 'and' to the end of bullet point three so it is clear that all elements of clause (b) are required.	8	T6		Agree	Add "and" to the end of bullet point 3 of T6b
R 50: add 'for all users' to end of clause (iii)	10	Q7		No objection	As requested.
R 51: amend supporting text of policy Q1 as follows: 'The Council will expect applicants to use documents such as Planning and Access for Disabled People (DCLG) 2006 and CABE's 'The principles of inclusive design', 2006 <i>or any relevant updated replacement</i> to inform their design approach and proposals.'	10	Q1		No objection.	Accepted.
R 52: Amend clause (b) first bullet point to read as follows: 'provision of infrastructure, for example transport, education, health, libraries, sport and leisure, emergency services, and cultural and community provision.'	4	D4	(b)	Accepted in part. Infrastructure provision must be secured on site.	Amend Policy D4 (b) first bullet point as follows: "on site provision of infrastructure, <u>such as</u> transport, education..."
R 53: paragraph 7.8 bullet point three should be amended as follows: 'market and advertise the vacancy for D1 or D2 use <i>continuously</i> for a twelve month period...'	7	S1	7.8	Accepted	Insert the word "continuously" as recommended.

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
R 54: that the policy team reviews paragraph 7.16 in light of the test of policy ED2 (that only provides for D1 use not D2).	7	S2	7.16	The reference to D1 uses in policy ED2 relates to an exception to the loss of B class floorspace; this exception does not apply to D2 uses. However, other clauses in the policy would apply to D2 uses. Paragraph 7.16 refers to “the tests of policies ED2 and ED3”. There is not considered to be an issue with this wording.	No change.
R 55: that the policy team revisit policies T1(c) and T6(b) in terms of their necessity, compatibility and implementation (in particular level of contribution to public transport capacity) given they are similar / repeated.	8	T1		No change required – T1 .	-
R 55: that the policy team revisit policies T1(c) and T6(b) in terms of their compatibility and implementation (in particular level of contribution to public transport capacity) given they are similar.	8	T6		No change – policies T1c and T6b are compatible.	-
R 56: that the policy team consider amending Policy EN1 to ‘The Council <i>will manage</i> open space by...’.	9	EN1		The current policy wording is considered to be satisfactory.	No change.
R 57: that the policy team define ‘major planning priorities’ with respect to policy EN1.	9	EN1		It will be for applicants to demonstrate that proposals meet major planning priorities as set out in the Plan that cannot be achieved in any other way.	No change.
R 58: that policies EN1, EN2 and EN4 are reviewed with the aim of better incorporating provision of living roofs and walls in all development proposals.	9	EN1		Provision for living roofs and walls is covered in policy EN4.	No change.

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
R 58: that policies EN1, EN2 and EN4 are reviewed with the aim of better incorporating provision of living roofs and walls in all development proposals.	9	EN1 EN2 EN4	EN4(c)	The draft policies are considered to give appropriate support to the provision of living roofs and walls while providing a safeguard in the event such development is proposed in a particularly sensitive location where it might not be felt appropriate (for example to a listed building).	No change.
R 59: That clause (g) is rewritten as follows: 'Developments proposals on sites abutting the River Thames and River Graveney will safeguard existing flood defence walls and regular maintenance, remediation and improvements to the flood defence walls will be required to ensure these remain in good condition. In addition, developments on sites adjacent to defences and culverts should demonstrate that their development will not undermine the structural integrity or detrimentally impact upon its intended operation.'	9	EN5		The existing policy wording is considered acceptable. Maintenance, remediation and improvements would only be required where necessary.	No change.
R 6: could include reference to parking areas being well lit and monitored by CCTV or passive surveillance to help address motor vehicle crime in the Borough.	8	T7		No change – covered by Community Safety policy Q3.	-
R 60: Review the use of the word 'consider' in clause (i)	9	EN6		Accepted.	Substitute the word 'consider' with the word 'implement'.
R 61: Remove the words 'where appropriate' from clause (vi)	9	EN6		Accept in part.	Substitute "appropriate" with "practical".
R 62: That clause (vii) is amended to include the words 'and the surrounding area' at the end.	9	EN6		This has now been addressed through other changes (re-wording) to Policy EN6 (vii).	
R 63: Amend policy to include all users of footpaths, including those with disabilities. The policy should also	8	T2		Agree with the point – but this should be added to 8.4 to make	Amend end of 8.4: "Provision for pedestrians should include <u>all</u>

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
require good accessibility for all users. For example, clause (a) could be amended to: 'Lambeth will improve conditions for all pedestrians, including those with disabilities, and make the walking environment safer, quicker, more direct, accessible and more attractive for all users.				the point that pedestrians means all pedestrians including disabled people – to make clear that the policy applies to everyone.	pedestrians, <u>including those with disabilities</u> . “
R 63: that the policy team review and rewrite clause (h) as it is currently poorly worded	11	PN2		Noted. The word 'by' is missing.	Amend as follows: (h) Ensure supporting infrastructure is provided to create a truly memorable place paid for <u>by</u> new development where it is necessary to allow growth to proceed or mitigate the impact of development.
R 64: Review clause (a)(ii) as to whether parking spaces specifically for car clubs and pool-car schemes should be provided in developments. Supporting text suggests that only 'contributions' are required and policy suggests just provision of such schemes.	8	T7		Amend supporting text to make clear preference for on-site provision – but contribution accepted where on site provision not possible.	Amend 8.26, line 7 – replace “contributions to car clubs and pool car schemes will be required...” with “provision of car club spaces and pool car schemes will be required...”
R 65: insert the word 'accessible' to (c)(i) before 'open space'	9	EN1		This is already addressed in Policy Q1.	No change.
R 66: Review policy and/or its supporting text in providing more clarification on what makes a site 'capable' of accommodating 10 dwellings, and what size or type do these houses need to be? For example would the policy apply to sites capable of accommodating 10 one bed units or studios?	5	H2(i)	H2(i)	Accepted.	Add to supporting text: “The Council will have regard to the density guidance set out in Policy 3.4 and Table 3.2 of the London Plan when assessing whether a site has capacity to provide 10 or more dwellings.”
R 67: Terminology across all policies and supporting text	5	H1	All	The terms 'homes', 'units' and	No change.

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
should be consistent unless it is specified that there is a difference in interpretation (homes, units, dwellings, houses).				'dwellings' are interchangeable. In the case of references to 'houses' and 'flats' (which are not interchangeable), the distinction is clear.	
R 68: Clause (e) – it is unclear what 'priority will be given' means or the value it adds to the policy. It is recommended that this is revisited by the policy team. A potential amendment is suggested: '(e) Affordable housing should comply with the preferred mix set out in policy H4 and rental levels should meet the needs of low income households within the borough, particularly with regard to family sized accommodation.'	5	H2	H2(e)	Accepted.	Amend policy H2 (e) wording as follows: " Priority will be given to delivering a Affordable housing that complies <u>should comply</u> with the preferred mix set out in policy H4 and at rental levels that should meet the needs of low income households within the borough, particularly with regard to family sized accommodation.'
R 69: It is recommended that green infrastructure provision is included in the supporting text of paragraph 5.21.	5	H2	5.7	Presumably the comment relates to paragraph 5.7 rather than 5.21. Accepted.	Add reference to green infrastructure in para. 5.7 as recommended: "...and be supported by appropriate social, physical <u>and green</u> infrastructure".
R 7: clause (a) (i) is amended as follows: ' <i>design-out opportunistic crime, anti-social behaviour, and fear of crime in a site-specific manner, based on an understanding of the locality and likely crime and safety issues it presents</i> '. Also, supporting text paragraph 10.6 should be included in policy.	10	Q3		No objection.	Accepted.
R 70: That the word 'normally' is removed from clause (a)(ii).	5	H4	H4(a)(ii)	The policy seeks to maximise the provision family accommodation, however the current wording ("normally") recognises there may be instances where family-sized market accommodation is not	No change.

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SA Recommendation	Section	Policy	Para.	Council response	Proposed change
				appropriate – for example due to site constraints, or where due to scheme viability smaller market units would deliver higher levels of affordable housing.	
R 71: that work-live developments is defined either in the glossary or supporting text of policy ED4 (glossary currently defined live-work spaces – is this the same?)	6	ED4		Accepted. A definition will be inserted into the explanatory text.	
R 72: that supporting text is included	6	ED4		Accepted. Supporting text will be introduced.	
R 73: that clause (d)(ii) is amended as follows: ‘the nature and form of the work activity would not have an unacceptable impact on the residential amenity of the area through, for example, noise, servicing, good deliveries, traffic generation or hours of activity that would be likely to cause nuisance.’	6	ED4		Accepted.	Policy ED4 clause (d) (ii) is amended to read: ‘the nature and form of the work activity would not have an unacceptable impact on the residential amenity of the area through, for example, noise, servicing, good deliveries, traffic generation or hours of activity that would be likely to cause nuisance.’
R 74: It is recommended that the Local Plan make provision for residential use above ground floor in town centres. If this is the intention of clause (c) policy ED7 then the supporting text should make this clearer.	6	ED6		Accepted. New clause on promotion of residential use above shops to be inserted into the Policy ED6.	Policy ED6 Clause (a) is amended to read: “delivering the regeneration of Lambeth’s town centres <u>including through encouraging residential development on appropriate sites.</u> ”
R 74: It is recommended that the Local Plan make provision for residential use above ground floor in town centres. If this is the intention of clause (c) policy ED7 then the supporting text should make this clearer.	6	ED7		Not accepted. This point has been addressed with the proposed amendment to Policy ED6 above.	Policy ED7 has now been deleted, with some parts moved to Policies ED2 and ED6.

APPENDIX 2
SCHEDULE OF SA RECOMMENDATIONS (FEB 2013) AND COUNCIL RESPONSE

SA Recommendation	Section	Policy	Para.	Council response	Proposed change
R 75: That the policy team review policy ED13 on whether there is other forms of visitor accommodation that are not included under C1 uses or hostels, or should the word 'other' in the second sentence of the policy be removed? If there are other forms of visitor accommodation that are not C1 class, the supporting text should be amended.	6	ED13		Noted.	Amend policy wording: " Other visitor accommodation <u>Smaller scale provision</u> will be supported elsewhere in the borough..."
R 76: Clause (b) is amended as follows: 'exceptionally the loss of residential accommodation for a nursery or childcare use may be acceptable where:...'	7	S2		The current wording ("...the use of residential accommodation...") is considered to convey the intended meaning clearly.	No change.
R 77: It is recommended that the last part of clause (a) is amended as follows: '...appropriate and acceptable in terms of impact on amenity of <i>adjacent</i> properties and road and traffic conditions of the location.' The supporting text should be amended to reflect this proposed change, and also to ensure that the Construction Logistics Plan covers the surrounding area in terms of environmental, traffic and amenity impacts.	8	T8		The policy wording covers the concern to protect residential amenity of adjacent properties – the supporting text explains the reason. No need to change.	-
R 78: That the supporting text makes it clear that the policy will be regularly reviewed during the plan period with the aim of increasing sustainability standards.	9	EN4	EN4	The policy refers to further detailed guidance being provided in a Sustainable Design and Construction SPD.	No change.
R 79: Last line of clause (b)(v) is amended to '...or harm the character or appearance of a conservation area.'	10	Q15		Accepted	As requested.
R 8: clarification of what is meant by 'untidy sites' is recommended.	10	Q5		N/A Policy Q5 deleted.	

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SCHEDULE OF SA RECOMMENDATIONS (FEB 2013) AND COUNCIL RESPONSE

SA Recommendation	Section	Policy	Para.	Council response	Proposed change
R 80: Clause (v) replace 'stench' with 'odour'	10	Q2		No objection	Accepted.
R 81: Clarify whether housing is appropriate in Oval local centre and if so, amend supporting text.	11	PN8		Housing is potentially an appropriate use within Oval local centre, as it is in all town centres, subject to relevant town centre policies. It is not considered that this needs to be clarified in the supporting text.	No change.
R 82: That the policy team review the interaction of policies ED6, ED7 and ED10 with the view of perhaps including references to policy ED10 in policies ED6 and ED7, or within their supporting text.	6	ED6		Accepted.	These policies have been reviewed.
R 82: That the policy team review the interaction of policies ED6, ED7 and ED10 with the view of perhaps including references to policy ED10 in policies ED6 and ED7, or within their supporting text.	6	ED7		Accepted.	This has been reviewed. Policy ED7 has now been deleted, with some parts moved to Policies ED2 and ED6.
R 83: That policy ED8(c)(ii) is reviewed by the policy team in light of the appraisal comments (that relate to food and drink uses (includes cafes, pubs, restaurants) providing opportunities for community engagement, social cohesion, and interactions).	6	ED8		Policy ED8(c)(ii) has been deleted as this is now addressed in centre specific policies.	
R 84: Clarification that off street uncovered markets are protected (in particular under clause (b)).	6	ED14		The term 'street markets' encompasses all uncovered markets.	No change.
R 85: that the policy team review clause (vi) with the view of removing at least the word 'increased' and potentially also 'identified' and including vibration so that the clause reads (for example): <i>'an impact assessment is submitted setting out the scheme in a visually clear way and identifying measures to overcome any noise or</i>	8	T10		Agreed	

APPENDIX 2
SCHEDULE OF SA RECOMMENDATIONS (FEB 2013) AND COUNCIL RESPONSE

SA Recommendation	Section	Policy	Para.	Council response	Proposed change
<i>vibration arising as a result of the operation of the equipment or any associated with its operation.'</i>					
R 86: The draft Local Plan should favour dual aspect residential units	5	H5	H5(a)(iii)	Accepted.	Add criterion Policy H5(a)(iii): "provide dual aspect accommodation, unless exceptional circumstances are demonstrated."
R 86: the draft Local Plan should favour dual aspect residential units or a presumption against north facing units although this design consideration is included in some site allocations.	10	Q2		Accept the point but do not agree that this belongs in policy Q2. An amendment is best placed in H5	Suggested test in Policy H5 (a) <i>iii use good design to minimise the provision single-aspect flats; avoiding the provision of any purely north facing units.</i>
R 87: That decommissioned art work should be relocated elsewhere in the locality (of the art work), or wider locality rather than elsewhere within the Borough.	10	Q4		No objection.	For clarification also insert <i>...relocated 'to a public place' elsewhere within the locality</i>
R 88: clarification is sought on the implementation of clause (c)(ii). It is recommended that clause (c)(ii) is amended as follows: 'Large-scale redevelopment schemes; and'	10	Q4		No objection	Accepted.
R 89: The policy also states that an audit of public art works of 'sufficient special interest' will be prepared by the Council. It is unclear how these will be identified, but these should include all types of art from different groups, including equality groups, and should include such art as graffiti.	10	Q4		Noted	This is best addressed through the preparation of the audit – a criteria will be prepared at that stage.
R 9: that the word 'adjoining' in clause (viii) is amended to 'adjacent' so that vehicular access, parking and servicing is designed to be well related to the	10	Q8		No objection	As requested.

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SCHEDULE OF SA RECOMMENDATIONS (FEB 2013) AND COUNCIL RESPONSE

SA Recommendation	Section	Policy	Para.	Council response	Proposed change
surrounding area, including across the road.					
R 90: Clarification is also sought on whether there is a difference in the terms 'gaps' and 'spaces' (between buildings) that would affect implementation of the policy.	10	Q7		(v) yes there is a difference. A gap is the vertical void between buildings. A space is an area of land – open space, amenity space etc.	
R 90: For consistency, it is considered that the word 'sustainable' is removed from the first line of policy Q7.	10	Q7		Accepted.	
R 91: That the word 'adjoining' in clause (viii) is replaced with 'adjacent to'.	10	Q7		No objection	As requested.
R 92: Policy Q8 is on the urban design of new development, and policy Q12 is on building alterations and extensions. Clarification is sought on the design policy applicable for major refurbishments.	10	Q12		Accepted.	Insert clarification text in policy Q12 "this policy will also be applied to significant refurbishment schemes."
R 92: Policy Q8 is on the urban design of new development, and policy Q12 is on building alterations and extensions. Clarification is sought on the design policy applicable for major refurbishments.	10	Q8		Policy Q8 will also be applied to significant schemes.	
R 93: Insert the words 'for example' in clause (a)(ii) at the beginning of the plant equipment listed in the brackets.	10	Q12		Accepted.	As requested
R 93: Insert the words 'for example' in clause (v) at the beginning of the plant equipment listed in the brackets.	10	Q8		No objection	As requested.
R 93: policy Q8(v) refers to 'important elevations' while policy Q12(a)(ii) refers to 'publically visible elevations'. It is considered that the latter term is less ambiguous and	10	Q8		No accepted – some elevations, whilst not publically visible, will enclose gardens and amenity	No change

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SCHEDULE OF SA RECOMMENDATIONS (FEB 2013) AND COUNCIL RESPONSE

SA Recommendation	Section	Policy	Para.	Council response	Proposed change
therefore policy Q8(v) should be amended.				spaces. The use 'important' is a catch-all term which will interpretation.	
R 94: That clause (iv) is be reviewed by the policy team, particularly with reference to the second sentence.	10	Q8		Accepted.	Review policy.
R 95: That the word 'is' of the first line is removed to clause (i).	10	Q10		Text amended.	
R 96: Clause (ii) refers to retaining 'existing planting and landscape features <i>of interest</i> ' (emphasis added), but there is no guidance on how this might be defined. It is recommended this is reviewed by the policy team.	10	Q10		Accepted. However, this is a qualitative judgement which will have to made at application stage by suitably qualified offices.	Change text to ' <i>of value</i> '
R 97: provision for permeable surfaces/paving should also be included with respect to hard landscaping features.	10	Q10		No objection	Change text
R 98: that paragraph 10.29 is amended so that a landscape design scheme and management/maintenance programme is provided for all landscaping proposals for all developments	10	Q10		Objection. Not all schemes require this level of information.	No change.
R 99: It is considered that policies of the draft Local Plan could be improved to more effectively ensure there is a net increase of vegetation and trees resulting from new developments. There appears to be more of an emphasis on retention rather than new provision (policies Q7, Q10, Q11).	10	Q10 & Q11		Accept recommendation.	Add criterion to Policy Q10 – Landscaping: "Development will be supported where landscaping: <u>(iv) maximises opportunities for greening, such as through planting of trees and other soft landscaping.</u> "

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SCHEDULE OF SA RECOMMENDATIONS (FEB 2013) AND COUNCIL RESPONSE

SA Recommendation	Section	Policy	Para.	Council response	Proposed change
					Add criterion to Policy Q11 – Trees: “(e) <u>Wherever appropriate, the planting of additional trees should be included in new developments.</u> ”
R 99: It is considered that policies of the draft Local Plan could be improved to more effectively ensure there is a net increase of vegetation and trees resulting from new developments. There appears to be more of an emphasis on retention rather than new provision (policies Q7, Q10, Q11).	10	Q7		No objection	:Q7 (v) ‘new or enhanced open space...’ Q10 (ii) ‘retains and enhances existing...’
R 99: It is considered that policies of the draft Local Plan could be improved to more effectively ensure there is a net increase of vegetation and trees resulting from new developments. There appears to be more of an emphasis on retention rather than new provision (policies Q7, Q10, Q11).	10	Q7		Policy Q7 (v) already refers to supporting development that provides new landscaping and trees.	No change.
R176: That the Local Plan contain policy that requires Health Impact Assessments for all major development in the Borough.				Noted.	<i>Add a reference in supporting text (location tbc) stating that inclusion of health impact assessments in Design and Access statements for major developments is best practice and strongly encouraged.</i>
Supporting text paragraph 5.22 should reference policy H2 (a)(ii) rather than H3 (a)(ii).	5	H2	5.8	Presumably the comment relates to paragraph 5.8 rather than 5.22. Accepted, this is an error.	Amend wording to read “H2(a)(ii)” as recommended.