

APPENDIX 4
SA CONSULTATION COMMENTS FEB 2013

Name	Comment	Para.	SA response	Proposed change
Environment Agency	The EA support SA recommendation 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. The EA further consider this recommendation could be strengthened to incorporate all sites including those privately owned.		Noted.	
Environment Agency	<p>The borough Strategic Flood Risk Assessment (SFRA) should be included in para 5C12.1 relevant policy objectives of the Sustainability Appraisal (SA).</p> <p>Section 5C12.2 Baseline conditions and existing issues – surface water flooding should include the Flood and Water Management Act and the new role of local authorities in flood management.</p> <p>Para 5C12.2.10 should be reviewed in light of the borough Preliminary Flood Risk Assessment which identifies 14 Critical Drainage Areas.</p>	<p>5C 12.1;</p> <p>5C 12.2;</p> <p>5C12. 2.10</p>	Accepted. The updated SA will incorporate these comments.	
Environment Agency	<p>The EA support :</p> <p>Recommendation 149: that policies PN1 and PN2 include recognition of the identified flood risk for Waterloo and Vauxhall areas, and preferably any appropriate design guidance preferred for these areas; and</p> <p>Recommendation 150: that permeable surfaces are provided for all appropriate public realm improvements / new square and public spaces for all places and neighbourhoods policies; and</p> <p>Welcome paragraph 5C12.4.5 which recommends use of open spaces as flood storage areas, reducing the amount of surface water flooding and runoff by allowing infiltration of water into the ground.</p>	<p>5C12. 4.12;</p> <p>5C12. 4.5</p>	Comments noted.	No change.
Natural England	<p>NE recommend the incorporation of the following additional Monitoring Indicators:</p> <ul style="list-style-type: none"> § Percentage of development planning approvals that have incorporated new biodiverse open space § Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls) § The achievement of BAP targets § The change in area and condition of BAP Habitats/Species § The change in area and percentage in positive conservation management of Sites of Importance for Nature Conservation 		Noted.	The SA will be updated to include these comments.
Natural England	NE agree with the conclusions of the HRA Screening Analysis that there are no likely significant effects of this Local Plan on Natura 2000 sites.		Noted.	
Lambeth and Southwark Public Health Directorate	Need to refer to Financial Resilience Strategy; Older People's Strategy and other health and well being strategies.		Noted.	Lambeth Cooperative Health and Well-being Strategy – A transitional

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				strategy for 2013-14 and Lambeth Older Persons Housing Strategy will be reviewed in the revised pre-submission SA.
Lambeth and Southwark Public Health Directorate	Support recommendation 176 that all major developments must have a Health Impact Assessment		Noted.	
Lambeth and Southwark Public Health Directorate	Planning to ensure that they engage with Lambeth CCG/CSU and Propco (re. health service solution) as well as Public Health.		Noted	
Lambeth and Southwark Public Health Directorate	'The key issues relating to health and wellbeing are loss of green space, density/size of housing leading to potential overcrowding and infectious disease, and difficulty in providing the necessary infrastructure, how the plan is going to mitigate against health inequalities (e.g. regeneration schemes can inadvertently lead to greater gap between rich and poor, how much affordable housing will be built etc.'		Noted. The SA concluded that positive effects are likely from Local Plan policies in protecting open space (policy EN1), positive effects are also likely in terms of density and size of housing as the local plan contains policies on housing mix (policy H4), affordability (policy H2), protection of family sized homes (policies H3 - H6), houses in multiple occupation (policy H9). Infrastructure delivery policies and the Infrastructure schedule seek to ensure there is appropriate social, physical and green infrastructure to support population and economic growth.	
Lambeth and Southwark Public Health Directorate	Unclear what is meant by 'characteristics' in Table 3 on page (x) if the non-technical summary.		The Characteristics heading in Table 3 refers to key topic areas/features (social, economic and environmental) that Lambeth Councils seeks to pursue.	No change necessary.
Lambeth and Southwark Public Health Directorate	The following comments are made in relation to Table 2: Key baseline statistics in Lambeth (non-technical summary): <ul style="list-style-type: none"> § Gaps in relation to wellbeing, life satisfaction and self-reported health data (available from the Residents' Survey); § Gaps in the information about intra borough inequality and the distribution of wider determinants; § Not always helpful to state the averages as Lambeth is a borough of the extremes (e.g. crime, who is it that feels the least safe? Why?; § Missing information on disability, age, LGBT, socioeconomic profile; 		The comments made by Lambeth and Southwark Public Health Directorate only refer to the Non-technical Summary (NTS), which only summarises the findings of the full SA. Accordingly, Table 2 of the NTS only highlights some key baseline statistics in Lambeth. For full baseline data and analysis of the sustainability of Local Plan policies, one	No change necessary, although if more updated information is available in the preparation of the pre-submission version SA; then this will be incorporated accordingly.

	<ul style="list-style-type: none"> § Missing the distribution of rented sector (i.e. what proportion is social housing, private rented and rented for social housing) and level of overcrowding and who is affected; § Noise and fuel poverty; § Consider commercial waste as there is potential for resource minimisation here as well as residential recycling; § What about cycling, walking; leisure opportunity; § Average not useful in relation to safety and crime; § No reference to disability including mental health; § Refer to welfare benefit reforms and potential impact; § More information about make up of businesses including employment through voluntary sector and type of work available in the borough; § No information about number of young people not in employment, education or training. 		<p>must refer to the whole SA document.</p> <p>Updated baseline data is provided in relevant topic areas in the SA. For example:</p> <ul style="list-style-type: none"> § crime data, including spatial data and results on when residents feel safe is provided in section 5C1.0 Crime of the SA; § data on equality groups is clearly set out in section 5C.5 Equality and Diversity, and concludes data on disability, race, gender, LBGT, sexual orientation, age, religion, socio-economic and languages. This section also provides spatial data on vulnerable households in the borough; § Housing data is provided in section 5C6 Housing and includes percentages claiming housing benefit, overcrowding statistics, social housing vs. private rented information, homelessness; § Data on the environment is provided throughout the SA such as sections 5C11 Energy and Climate Change (and this includes spatial analysis of fuel poor households), 5C14 Air Quality, 5C13 Waste; 5C12 Water, 5C10 biodiversity. § Data on the economy including NEETs and the make up of businesses (including spatial disparities) is provided in sections 5C14, and 5C16&18. The relationship between unemployment and mental health is recognised in the SA particularly in sections 5C2 and 5C5. 	
Lambeth and Southwark Public Health Directorate	<p>The following comments are made in relation to Table 3: Key sustainability issues:</p> <p>Housing: Having to deliver the London plan is putting stress on the borough and is likely to affect wellbeing by increasing density and impact on infrastructure. There is specific evidence about negative impacts of</p>	Table 3 NTS	<p>Table 3 of the NTS highlights key sustainability issues, and it is not exhaustive. It is also not an analysis or appraisal of the Local Plan policies. Most of the comments and impacts raised in</p>	

<p>high rise buildings (eg. Shell Centre redevelopment). What about the 'older older' age group (80 y+), their housing and impact on their ability to get around the borough and access services? The security of tenure would need to be considered as price of housing is going up which pushes up the rent. Should also refer to the proportion of social housing required, especially in new developments. Consideration should also be given to implications on quality of life during the construction phase (eg. noise, pollution, waste, access to infrastructure).</p> <p>Employment: important to identify the type of work as not all work will lead to better wellbeing and health. There is no reference to young people's unemployment. Should also link with information about skills availability within existing populations (ie Portuguese speaking community in construction and hospitality). Need to set a target for % of local people to be employed on new development sites as condition of planning using Planning Agreements. Should also set London Living Wage as minimum.</p> <p>Environment: impact depends on who gets to live in these houses. Need to check evidence of wellbeing impact of mixed use development (ie bar in a residential building and any quality of life issues). Will require regulations. Include fuel poverty statistics. Needs to consider affordability of transport if taking into consideration reducing inequalities (eg. People from lower socio-economic groups may not benefit from extension to tube line as many use bus). Increasing bus lanes and signage to encourage walking and cycling. And consequence on noise of type of occupation and increased density of housing</p> <p>Transport: extension of northern line tube likely to increase flow of people going through the area and the risk associated with increased crowd (traffic accidents for example</p> <p>Equalities and accessibility: This issue should run through as well as health and wellbeing. Needs to specific who is not well / do not have healthy living conditions in Lambeth. This section is missing data on age, disability, LGBT, ethnicity.</p> <p>Health and wellbeing:</p> <p>What about "dust" associated also with building work? Also some people are more affected by air pollution such as people with asthma, chronic pulmonary diseases</p> <p>What about industrial sites , large builders yards, recycling sites and their impact on the surrounding neighbourhood esp. if in close proximity to residential areas?</p> <p>Health facilities are not the only solution to mitigate the impact of health inequalities. Addressing health inequalities is everybody's business and requires addressing wider determinants of health (housing, education, access to employment) . In particular, there is little mention of issues relating to education (eg. Lack of school places). What about conditions of access to health facilities such as transport and opening hours? And</p>	<p>the representation are addressed in the SA under the appraisal section i.e. Section 5, most specifically section 5C.</p> <p>Health is a complex matter that involves a wide range of factors. As such the Local Plan has been thoroughly and systematically appraised with regards to health and wellbeing, and this is evidenced particularly, but not exclusively in sections 5C2 and 5C5.</p> <p>Nonetheless, some additional information in Table 3 may be appropriate (for example reference to proliferation of betting shops, pawn brokers in town centres and locations of hot food takeaways (the Local Plan contains policies on these)) and therefore Table 3 will be reviewed in this respect in the pre-submission SA.</p>
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	<p>health facilities aren't just GP surgeries, but community health services and increase capacity needed in hospitals, ambulance service and A & E. No mention of social care services.</p> <p>Need to link planning policy to the Public Health Outcomes framework and check it is going to help achieve these.</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/127177/Improving-outcomes-and-supporting-transparency-part-1A.pdf.pdf (in particular, improving the wider determinants of health) these could be indicators to help to monitor the policy rather than those listed on p68.</p> <p>Town centres and regeneration: Need to include something about managing use of shops and containing proliferation of fast food outlets, gambling and money lenders. Planning should seek to preserve and protect areas for small scale community projects, local food production and diversity of shopping facilities. This section needs to include statistics on road traffic accidents and pedestrian safety. Needs to include something about how to involve residents more creatively in regeneration plans (and in particular those from under-represented groups) and on deciding how CIL/community development trust monies are spent and producing neighbourhood plans (eg. as in Loughborough Junction) as there is good evidence to show that participation in local democracy improves wellbeing. Could also ensure the creation of 'pocket parks' in regeneration schemes to mitigate against the impact of loss of open space elsewhere.</p> <p>Open space and recreation: Particular attention needs to be given to the loss of open green space as there is good evidence that access to green space is good for mental wellbeing and outdoor play is very good for children's development. There is less evidence around green space and uptake in physical activity, but it should still be noted. Opportunities should be found to protect existing green space and ensure new developments comply with the recommended Accessible Natural Greenspace Standard (ANGsT) insofar as is practicable. This is that all people should have access to natural green space of:</p> <ul style="list-style-type: none"> ○ At least 2 ha within 300m of their home ○ At least 20ha within 2kms ○ At least 100ha within 5kms ○ At least 500ha within 10kms <p>There are alternative options to achieve this (eg. by organising dual use of school playing fields or facilitating public use of private open spaces, ensuring existing parks achieve Green Flag status). In addition, there should be some reference to those groups that are currently not accessing the parks. Loss of open space in general will limit opportunities for physical activity. Developments that do not facilitate wider community interaction can lead people to have sedentary lives and contribute towards</p>			
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	<p>poor mental health. Also need to consider opportunities for local food growing.</p> <p>The Built Environment: As mentioned before, need to pay heed to evidence re. high rise/high density residential developments and impact on health and wellbeing.</p> <p>Infrastructure: Needs to be more specific about which areas of infrastructure are under the most pressure – schools, transport? In health and wellbeing terms this actually raises the question – at what density levels does population expansion harm health and wellbeing? Do the housing targets themselves have a negative impact on the health and wellbeing of the borough and how can these be mitigated?conducting systematic impact assessment on new development would help to identify infrastructure issues taking into consideration the specificity of the area and project</p> <p>There is limited mention of social cohesion and social capital in the appraisal. Planning can have a positive impact by ensuring safe permeable environments where people from all backgrounds can mix. Mixed use developments in town centres and residential areas can help widen social options. Social cohesion can be impacted upon by roads severing community links, loss of community facilities (eg. a local pub, places of worship). Social infrastructure should not be limited in terms of public sector services.</p> <p>Air quality is flagged, but we think noise and neighbourhood amenity in general should be looked at in more detail. The availability of amenity space can facilitate physical activity. If residents are living close to busy roads, industrial sites etc. then they can be subject to noise, dust and fumes. The visual amenity of an area can also impact on general sense of wellbeing and whether people go outdoors. This is more critical when planning new residential facilities for people with high social support needs or the elderly.</p>			
Lambeth and Southwark Public Health Directorate	Replace NHS Lambeth with 'Lambeth and Southwark Public Health Directorate'.	1.3.1	Accepted.	All references to NHS Lambeth in both Local Plan and SA should be replaced with 'Lambeth and Southwark Public Health Directorate'.