

Appendix 5 provides a summary of the SA results of the broad strategic options and policy alternatives identified and assessment as part of the development of the adopted Core Strategy and this new Lambeth Local Plan.

The Core Strategy Issues and Options Paper

One of the first stages of the development of the Core Strategy was to develop options for achieving the strategic objectives described in the previous sections. An Issues and Options Paper was produced by the Council in June 2008. It contained 5 key overarching issues that the council felt needed to be addressed over the next 10-15 years. These were developed following a review of the evidence base and earlier consultation on issues during February-March 2008 and comprised:

- accommodating population growth;
- promoting community cohesion and strong, safe neighbourhoods;
- achieving economic prosperity and fairness for all;
- tackling climate change; and
- creating attractive, distinctive places.

The Options Paper then set out a **Vision**, a set of strategic spatial **objectives** (12 in total) and an initial set of **options** for how to achieve these objectives. These initial options related to questions of broad strategic location. They were grouped under 9 themes. Lambeth residents were asked to indicate which options they preferred, or to suggest other options the Council should consider.

The SA first commented on the Vision and strategic spatial objectives, set out in the Issues Paper. It concluded:

'The vision and strategic objectives broadly portray a sustainable approach to the Borough's future development. There is a balanced approach to social, environmental and economic issues and a real desire for a low carbon future based on sustainable design, efficient use of resources, provision of local jobs and services and promotion of sustainable modes of travel. This is reflected by the broad support for this vision in the consultation'.

The SA highlighted a number of issues for the Council to consider for inclusion within the strategic objectives, or address elsewhere in the Core Strategy or DPDs. These were:

- Quality of housing is important and should be referenced (not just supply and affordability);

- The design of high density environments should respect local amenity;
- Protecting valued views, especially in view of the push for high density development;
- Reducing carbon emissions from transport as well as other sources;
- Increasing public transport capacity;
- The need to reduce the need to travel by private car;
- Addressing any possible tension between development and protection of local wildlife amenity;
- The provision of renewable energy, including on-site generation;
- Preparing the Borough to adapt to climate change;
- Consideration should be given to incorporating flood defences into all new housing developments in northern Lambeth;
- The identification and allocation of waste management sites to meet the London Plan apportionment; and
- Targeting the regeneration of London Plan Areas of Regeneration.

Appraisal of the Options

The next stage of the appraisal process, task B2, was to appraise the options. The results of the appraisal of options were taken into account by the Council officers in the development of the draft Core Strategy.

Purpose of appraising options

The purpose of appraising alternative options was to compare the sustainability impacts of alternative ways of addressing the same issue. The conclusions from the appraisal were designed to assist both decision-makers and those commenting on the Options Paper to compare the potential impacts of alternative options and to assist in defining the draft Core Strategy. The aim therefore was to help inform decision-making.

The purpose of appraising alternative options is *not* to identify which option is more sustainable. In almost every case options will have both positive and negative impacts on the sustainability objectives. Therefore it is not possible to be definitive about whether one option is more

sustainable than another. However, sustainability impacts should be given greater weight where they impinge on the key sustainability issues that have been identified for Lambeth. Therefore the conclusions for each option discuss the impact of the option on the key sustainability issues.

The purpose of appraising options was to give guidance to the planners in the development of policies.

In the following section we report on the results of the appraisal of the broad strategic options. As mentioned, the full results of the appraisal are contained in Appendix 5.

Summary of appraisal results for key strategic options

The numbering below relates to the numbering in the Options Paper.

Issue 1 - There is a need to identify additional opportunities for the development of new homes. In addition to existing policies this could be achieved through various means.

- A. Allowing the release of currently safeguarded employment sites where these sites are surplus.
- B. Allowing the release of currently safeguarded employment sites regardless of whether they are surplus (which will have implications for Issue 6 below)
- C. Promoting redevelopment on certain housing estates that require modernisation.
- D. Allow more intensive mixed development schemes on commercial sites if these include housing.
- E. Accept higher densities for housing in town centres and other locations with high public transport accessibility.

Appraisal conclusions

The appraisal found that overall, Options C and E are the most sustainable, although consideration should be given to enhancing and maintaining the public realm in order to increase safety and reduce the fear of crime. Options A, B and D should be carefully planned, with consideration given to public transport links and access to employment opportunities. Residents had also highlighted a lack of certain types

of infrastructure in certain places (i.e. Waterloo needs open space, West Norwood needs new family facilities) and the SA recommended that these issues should be dealt with if possible through the policy. Any preferred option should include: provisions for public realm; the promotion of social cohesion; and the integration of public transport availability.

Issue 2 – How can we achieve the right mix of affordable and market-priced housing?

A. Apply the London Plan threshold and percentages consistently in every part of the borough.

B. Vary the locations in which we apply the London Plan threshold and percentages in relation to the level of affordable housing already in each neighbourhood. This could facilitate the introduction of more market-priced housing through housing estate regeneration, and the introduction of a higher proportion of affordable housing in parts of the borough where there is little there at the moment.

Appraisal conclusions

Option A and B could be equally as successful in providing numbers of affordable homes. However, both approaches could lead over time to similar levels of affordable housing in every area of the Borough (depending on how option B is implemented – it appears to be advocating an equalisation in proportions of affordable housing in the different areas in the Borough). This is positive in that it would give people a wider choice as to where they can live and would provide more mixed communities generally. However, it does not necessarily address the concern of Lambeth residents that there are particular shortfalls of affordable housing in particular areas (and these might be areas that already have high levels of affordable housing). A flexible approach is needed (Option B) to reflect the views of residents, but one that does not necessarily seek to equalise the proportions of affordable houses across the different areas of the Borough. This needs to be based more on needs and levels of services available. If a flexible approach is taken forward, it needs to be based on needs and levels of services available. Developers should be required to undertake this research to ensure that needs are met and the facilities are available to service all housing. It is vital that if affordable housing is being built as part of a development the design and quality should be the same as the market housing in order to foster community cohesion. Best practice guidance and London policy guidance should be followed in this regard.

Issue 3 – How should we achieve a mix of dwelling sizes to meet housing need (e.g. mix of one and two bedroom flats and larger family homes)?

A. Encourage a mix of dwellings in every new major housing development but not be prescriptive about the proportions of each size.

B. Prescribe proportions of each dwelling size for every major housing development irrespective of location in the borough.

C. Identify any shortfalls in the supply of dwellings of particular sizes in each local neighbourhood, and require a proportion of all future residential development in that area to contribute to meeting this shortfall.

Appraisal conclusions

The achievement of a mix of dwelling sizes contributes to mixed communities ensuring greater diversity of residents. This has a number of benefits. However, out of the three options, option C is most likely to lead to a true mix of residents because it is likely to be better at identifying and resolving particular shortfalls. Option A may lead to a mix but possibly not enough to solve particular shortfalls and option B may lead to an oversupply of certain types of development in certain areas and an undersupply in others. The sustainability of each of the options is broadly similar and is dependent on how other (particularly development control) policies are developed in the plan. Issues which should be addressed irrespective of the option chosen were: ease of access to various healthcare facilities; access to green space; how flat conversions can be balanced with the provision of family housing; access to shops and services; and energy efficiency (recommending a policy on sustainable design and construction more generally). In some areas, a proportion of all dwellings should be designed for elderly and/or disabled residents.

Issue 4 – How should we decide the right level of density for new residential development?

A. Broadly reflect the existing level of residential density in the area (i.e. relatively low densities in low density areas and high densities in high density areas).

B. Direct high density residential development away from existing high density areas and towards lower density areas with good public transport provision.

Appraisal conclusions

The main impact of both of the options is likely to depend on the ability of the planning system to ensure that adequate services are available for everyone and this access to services is going to be vital in deciding where to locate high density development. This could be achieved in both options. However, there is more of a risk with Option A that needed facilities are over-subscribed in already high density areas. It will also be important for housing to be near to public transport links. Option B explicitly states this but the effect of Option A is more uncertain as it depends on the access to public transport in the particular areas where development is taking place. If Option A is taken forward access to public transport should be a factor in deciding where to locate development. Option B, which scored more highly in the appraisal, is a sustainable option as long as adequate services can be provided.

Issue 5 - Where should we allow new conversions of houses into flats?

- A. Allow them anywhere in the borough, subject to an appropriate minimum floor area and meeting design requirements.
- B. Restrict conversions in areas which already have high levels of converted flats (as established through survey data).
- C. Allow conversions in areas where there is a specific housing need and according to the dwelling mix required in each residential neighbourhood.

Appraisal conclusions

The main concerns related to flat conversions are the lack of infrastructure available to service the increased number of people in the area (especially parking) and the fact that they can contribute to (especially with rented accommodation) “churn” in the housing stock. Both of these factors can contribute to an unhealthy and unsustainable housing environment. Option A could potentially have a negative effect on both these factors. Option B could have a positive effect in that it seeks not to overload certain communities with flat conversions. However, it will not be positive in addressing the very real housing shortfall in some areas that can only be solved by allowing flat conversions in some circumstances. Therefore, Option C is seen as the most positive option as it can address both factors. Whichever option is chosen, consideration should be given to how flat conversions can be balanced with the provision of family housing and how much needed infrastructure will be provided. The sustainability of each of the options is broadly similar and is dependent on how other (particularly development control) policies are developed in the plan. Issues which should be addressed irrespective of the option chosen were: how flat conversions can be balanced with the provision of family housing and how much needed infrastructure will be provided; parking issues (particularly in relation to Options A and C) and impact on valued townscape; access to green space; energy efficiency; design for biodiversity.

Issue 6 – How should we increase the number and variety of jobs in the borough?

- A. Identify the broad locations appropriate for commercial development, without being specific about which economic sectors will be encouraged.
- B. Identify the broad locations appropriate for commercial development and specify the key economic sectors to be encouraged within the borough.
- C. Same as A, but also introduce a requirement to include different types of commercial space in developments.

D. Same as B, but also introduce a requirement to include different types of commercial space in developments.

Appraisal conclusions

Options B and D scored more favourably from a sustainability perspective given that they are more likely to deliver the type and variety of employment that the Borough wants to attract and the Council may have more of an influence over the sectors involved and could influence the wider environmental and social sustainability of future employers. Key growth sectors (options B and D) have the added advantage of being specifically supported by policies in the London Plan and the London Development Agency's Economic Development Strategy and funding schemes. Option D would perhaps be the most favourable given that it would provide a range of commercial premises, in terms of size and affordability and so help to foster the smaller companies (e.g. SME and self employed) as well as the larger companies. This would provide improved social benefits, especially to equality target groups and in terms of health, as access to employment is a key determinant of health. Broad locations identified for commercial development should be well served by public transport, cycling and walking. They should serve to meet the needs of Areas for Regeneration identified in the London Plan.

Issue 7 - How can we achieve an adequate supply of affordable business premises?

A. Encourage new affordable business premises but not be prescriptive about the type, size, location and cost.

B. Require a proportion of affordable business premises in all new office and light industrial development (to be secured through a legal agreement).

C. Same as B, but only in certain parts of the borough where demand for affordable premises is highest.

Appraisal conclusions

Option A is unlikely to deliver the affordable units required by the Council. Option B is likely to present risks in terms of unwanted and unused units (which could have negative crime and liveability impacts) and be a waste of scarce resources. Option C would provide the most favourable sustainable option given that: it meets identified need; it would reduce the need to travel, reduce CO₂ emissions and is preferable from an air quality perspective; and it makes the best use of scarce resources, including land and environmental resources.

Issue 8 – How should we increase Lambeth's sustainable waste management capacity?

A. Find as much land as possible to develop new facilities, which may involve the loss of other employment-generating uses.

B. Integrate waste collection, treatment and disposal as far as possible within major new residential and commercial development, so that the overall land-take across the borough is minimised.

Appraisal conclusions

Option B gives a more efficient use of land. Option A may take land from much needed employment uses. However, both options are likely to be needed so options need to be developed which minimise land take from new larger facilities. Managing waste sustainably in London will require significant infrastructure development and the Core Strategy needs to ensure that the appropriate infrastructure is in place within the borough to maximise recycling, composting and waste disposal at source, as well as for the effective operation of the waste collection service. A combination of both options is likely to be needed. All waste sites are likely to have some sustainability effects but the extent of these is dependent on the size of the sites and the particular waste management method used on site. Smaller neighbourhood facilities (Option B) could have more impact on issues like noise and amenity because sites are located nearer to residential areas. However, the nature of the facilities located on such sites are likely to be smaller and more “neighbourhood friendly” than larger sites. Smaller sites are also likely to reduce the distance waste travels to be treated, thus reducing greenhouse emissions. Larger sites may have more visual impact because of their size and HGV movements are also likely to be higher. However, because they are more likely to be located in industrial type areas, the impact may be less. In addition, larger facilities might have more space to build in mitigation (especially habitat mitigation). Both options are likely to be positive in terms of employment and skills as the development of a green industries sector will lead to new training and employment opportunities for Londoners and contribute to sustainable economic growth. Both options are likely to be positive but it is important that people with the right skills are trained especially with the move to new waste management technologies. Sensitive design of facilities is key for both options and should be built into policy. Siting waste management facilities in an AQMA is likely to give rise to some air quality issues which will need to be addressed for each site.

Issue 9 - Where should we locate tall buildings, subject to safeguarding protected views and World Heritage Sites?

- A. Allow them anywhere in the borough, subject to design, proximity to public transport and the individual circumstances of the site.
- B. Identify particular areas of the borough where they definitely should not be located.
- C. Identify areas of the borough where tall buildings should be particularly encouraged.

Appraisal conclusions

Option A is very reactive to planning applications and would not give local people any certainty about the future location of tall buildings. Options B and C give more opportunity to plan proactively and a combination of the two would enable the council to consider the factors that are necessary for successful high rise development (and the areas that most successfully fulfil these) and also the areas which (for any reason) would not be able to sustain such levels of development. Two factors that are important in making tall buildings a success are good design (and management) and location of tall buildings in areas where adequate public services are available. Option A in particular poses a risk that tall buildings will be located in areas where public services are already over-subscribed. More consideration can be given to adequate services through Options B and C. There is a concern that high rise buildings don't work well with social housing (especially when not built to a high standard), particularly in relation to elderly and other vulnerable people. Any policy should take this into account, for example limiting tall buildings to mainly private development or offices or through design and management policies.

National and regional requirements

In addition to the issues and options outlined above, the Council identified a number of other issues, for which no alternative options were identified, i.e. accepting that there were some things that the Council should not change. These included the following 'London Plan requirements':

- the target of a minimum of 1,195 additional homes in Lambeth each year until 2020/21;
- the target to provide at least 50 per cent affordable housing in new housing developments of ten or more units;
- that all new homes are built to lifetime homes standards and that 10 per cent of new housing is designed to be wheelchair accessible or easily adaptable for wheelchair users;
- to protect Metropolitan Open Land and open space;
- to reduce carbon emissions by specified levels;
- to manage as much of Lambeth's waste as possible within the borough;

- to protect safeguarded views and World Heritage Sites; and
- to follow specified density criteria for different types of area.

The Council must also take account of the requirements of national planning policy (see www.communities.gov.uk/planning) such as:

- to locate major shopping developments, and other uses that attract a lot of people, in town centres;
- not to locate new housing within flood risk zones;
- that every major development should undergo an Environmental Impact Assessment;
- to apply prescribed maximum parking standards to different types of development; and
- to protect and enhance historic assets.

Many of these requirements are reflected in the Lambeth Unitary Development Plan. In addition, there are some spatial issues which the Council felt should be partly addressed through other areas of policy, such as:

- housing allocations policy;
- other elements of economic development policy (e.g. business advice, job brokerage, skills training, town centre management);
- management of the public realm, parks, open spaces and natural areas; and
- other elements of sustainable waste management policy (e.g. measures to encourage waste reduction, re-use and re-cycling).

Draft Local Plan Reasonable Alternatives Feb 2013

Table A below provides a summary assessment of the reasonable alternatives considered for draft Local Plan policies and the SA analysis of the alternatives identified.

Table A: Reasonable Alternatives draft Local Plan policies

Policy	Reasonable Alternatives	SA Summary
H2 – Delivering affordable housing	<p>(1) <i>Always requiring affordable housing on site even if this means accepting a lower proportion (based on feasibility);</i></p> <p>(2) <i>Always allowing affordable housing offsite; clearly defined criteria as to when off site would be allowed (proposed approach); and/or</i></p> <p>(3) <i>Payment in lieu in exceptional circumstances to feed into existing stock of affordable housing (proposed approach).</i></p> <p><i>There were also alternatives considered relating to the percentage of affordable housing required (i.e. a lower threshold); varying the threshold across the Borough and not requiring affordable housing provision or payment on sites providing less than 10 units.</i></p>	<p><i>It is considered that varying the percentage threshold for different parts of the Borough or the other alternative of always allowing affordable housing offsite may not result in best effect for mixed communities, health, fully inclusive communities, equalities, opportunity for a decent home or promote social cohesion or social interactions between different sectors of the community. Therefore it is considered this option could have significant detrimental effects on SA Objectives 2, 3, 5, 6, 7. In addition the Viability Assessment does not support this approach. It is considered that always requiring affordable housing onsite (even if this reduced the amount) limits flexibility of the policy and therefore could have adverse impacts on provision of affordable housing and consequentially adverse mental and physical health of residents to access decent affordable homes. Requiring a lower percentage threshold (for example 30% rather than the proposed 50%) effectively reduces the target for developers and will result in less affordable housing being delivered in the Borough. In the interests of SA Objectives 2, 5, 6 and 7 in particular it is considered more appropriate to set a higher target and then if necessary negotiate with developers on the most viable scheme proposed for the site.</i></p>
H3 - Safeguarding existing housing	<p>(1) <i>Not allow exceptional loss of residential units for nursery or childcare use.</i></p>	<p><i>While this alternative may result in more net housing in the Borough; the proposed policy only allows loss of housing in exceptional circumstances, and for a cause that will help local families. Provision of local nursery or childcare can help parents with their work/life balance which has beneficial health impacts on parents and families (can help tackle child poverty), improved accessibility, and more liveable environments encouraging a better sense of place for families. It is therefore considered that the alternative of not allowing in exceptional circumstances the loss of residential housing for childcare would likely result in some adverse impacts for local communities with regards to SA Objectives 2, 3, 5, 6, and 7 in particular.</i></p>
H4 - Housing mix in new	<p>(1) <i>No percentage targets for</i></p>	<p><i>The risk of not setting percentage targets for affordable housing would be that family size dwellings</i></p>

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developments	<i>affordable housing; and setting percentage targets for market housing.</i>	<i>may not always be delivered in schemes and this would likely result in significant adverse effects in terms of health, mixed communities, accessibility, equalities, provision of decent affordable homes, and liveability / sense of place. SA Objectives 2, 3, 5, 6 and 7. Setting targets for market housing was considered unreasonable by the policy team who consider that such housing should be left to the market to determine. The policy encourages family size housing though and it is considered this is an appropriate approach with regards to SA Objectives 2, 3, 5, 6 and 7.</i>
H5- Housing standards	<ol style="list-style-type: none"> (1) <i>Produce Lambeth housing standards;</i> (2) <i>Adopt London Plan housing standards or;</i> (3) <i>Use a combination of both (i.e. London Plan for internal standards and Lambeth standards for external standards (as proposed).</i> 	<i>London Plan housing standards for external open space requires as a minimum less open space than the proposed Lambeth standard and the London Plan standard states open space should 'be overlooked by surrounding development' .It is considered that the higher standards of open / communal amenity space included in the Lambeth standards offer increased likelihood of more beneficial effects with regards to mental, emotional and physical health and wellbeing of all residents, including children and the amount of play space. Similarly more positive effects are expected through the Lambeth standards in terms of increased likelihood of accessibility to open space and children's play areas for all to use and enjoy bringing positive effects for SA Objectives 1, 2, 3, 5, 6, 7, 10.</i>
H7 - Student housing	<ol style="list-style-type: none"> (1) <i>Include capping student housing levels when certain levels are met in certain areas; and</i> (2) <i>Setting a cap on student housing in Lambeth as a whole.</i> 	<i>Depending on the level of the cap; it is considered that these alternatives may not be conducive to creating an environment that is fully inclusive with respect to students and providing everyone (which includes students) opportunity for an affordable home – if the cap is too low, then students will be adversely affected, and if the cap is too high other household types may be limited in supply. However, for other SA Objectives, such as transport and travel, provided that student housing is located in areas of good public transport accessibility, the alternative approaches to capping student housing numbers is unlikely to have significant impact on SA Objective 9.</i>
H8 - Housing to meet specific community needs	(1) <i>include not resisting the loss of these housing types</i>	<i>In terms of health, accessibility and inclusiveness, equalities, social cohesion and supply of all forms of housing, this alternative would result in significant adverse impacts in the Borough, particularly exacerbating issues for more vulnerable groups of society and limiting housing options. Therefore, this alternative would likely result in significant adverse effects on achievement of SA Objectives 2, 3, 5, 6, and 7.</i>
H9 - Hostels and houses in multiple occupation	(1) <i>include not resisting the loss of these housing types</i>	<i>In terms of health, accessibility and inclusiveness, equalities, social cohesion and supply of all forms of housing, this alternative would result in significant adverse impacts in the Borough, particularly exacerbating issues for more vulnerable groups of society and limiting housing options. Therefore, this alternative would likely result in significant adverse effects on achievement of SA Objectives 2, 3, 5, 6, and 7.</i>
ED1 - KIBAs	<ol style="list-style-type: none"> (1) <i>Included not having any KIBAs;</i> (2) <i>Allowing schools in KIBAs;</i> (3) <i>Allowing housing in KIBAs; and</i> (4) <i>Retaining KIBAs but reviewing boundaries based on the Employment Land Review and removing the exception of schools</i> 	<i>In terms of health and particularly the impact employment has on people's health; it is considered important to retain employment generating land in the Borough. Retaining KIBAs is also likely to reduce poverty and social exclusion of local residents by providing the employment opportunity. However, it is recognised that for some deprived areas that currently have a number of KIBAs in the locality, the release of KIBA land may result in an improved environment, for example Loughborough Junction. In terms of climate change and energy; losing all or many KIBAs may result in lower carbon emissions in the Borough but it would depend of the replacement land use.</i>

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	<p><i>(as permitted by UDP).</i></p>	<p><i>of the KIBA. Domestic emissions account for a large percentage of emissions in the Borough (around 41%). Any loss of KIBAs and any associated reduction in carbon emissions needs to be weighed against the benefits of employment generating land in the Borough to both the Borough and wider London economy. In terms of infrastructure and waste management, loss of KIBAs would have an adverse impact on SA Objective 13. The Borough may not meet its waste apportionment targets as outlined in the London Plan.</i></p> <p><i>Allowing housing in KIBAs gives rise to conflicts in amenities / reverse sensitivity issues / bad neighbour uses which may have adverse impacts on residents' health. It also dilutes the cluster effect of KIBAs and therefore may have a detrimental effect in attracting inward investment and new businesses. However, in some areas the loss of KIBA land may be perceived as an improvement to the local area, but this needs to be balanced against the wider impacts associated with the loss of KIBAs, e.g. loss of employment. It is also possible that areas that include a number of KIBAs can be regenerated or improved without the loss of KIBA land.</i></p> <p><i>Allowing schools in KIBAs may increase risk of road and pedestrian traffic incidents and the location of schools in some KIBAs may not be conducive to a safe environment for learning (heavy vehicle movements, noise, vibration, odour etc). Allowing schools in KIBAs may result in fewer emissions than business or industrial operations on the site, although the reduction is considered to be de minimus, particularly when weighed against the adverse effects of allowing schools in KIBAs (on employment and health and accessibility for example). Releasing more land for schools would likely help meet the demand for school places. However, the appropriateness of schools in KIBAs would be dependent on the location and environment and existing landuse of each individual KIBA. Some KIBAs may be more appropriate than others. Policy ED2 does allow exception to the protection land currently in employment generating use for school places (D1 uses) where there is an identified need. The RA identified for ED2 is to not allow this exception. It is considered that this would result in adverse impacts on the achievement of SA Objective 15 – education and skills.</i></p> <p><i>In terms of the local economy and worklessness, it is considered that these alternatives would significantly adversely affect achievement of SA Objectives 16 and 18. The alternatives seek to reduce or eliminate land specifically designated for business use and loss of such land could have a detrimental effect on the local economy, particularly if such loss is not controlled.</i></p> <p><i>In terms of SA Objective 17; it is considered that loss of KIBAs may not necessarily maximise benefits to most deprived areas and communities if this results in loss of employment for local residents. However, loss of unused or underused KIBAs to other uses may prove a more efficient use of land at least in the short term, but it is possible this may not prove sustainable economically or socially in the long term.</i></p>
<p>ED2 - Business uses outside KIBAs</p>	<p>(1) <i>To allow loss of employment generating uses;</i> (2) <i>Not have the exception of loss for D1 uses; and</i></p>	<p><i>In terms of SA Objectives 2 and 5, it is considered that not controlling loss of employment generating uses would lead to adverse impacts related to health and employment (including child poverty, fuel poverty and mental illness associated with unemployment). In terms of waste, it is considered that not controlling loss of employment generating uses would limit sites available in the</i></p>

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	<p>(3) <i>Increasing the length of time a site must be marketed for B1 use before allowing residential use.</i></p>	<p><i>Borough for waste management, which would lead to adverse effects on the achievement of SA Objective 13. Again, in terms of SA Objectives 16 and 18, it is considered that not controlling loss of employment generating uses would lead to significant adverse impacts related to the economy and employment. In terms of SA Objective 17, loss of employment generating land or floorspace is unlikely to benefit most deprived areas and communities.</i></p> <p><i>In some circumstances it may be beneficial for health and other objectives (such as equalities, accessibility) to allow loss of employment generating land use for a local community or cultural use (D1 use) that meets an identified local need. In terms of SA Objective 4, it is considered that not having the exception of loss for D1 uses may result in some adverse impacts on provision of social infrastructure where there is an identified need for such infrastructure. The alternative of not allowing the exceptional loss of employment land for D1 uses may result in positive impacts for the economy, provided there is demand for employment and business generating land. Similarly, not allowing the exception for local community or cultural uses (where there is an identified need) is unlikely to benefit deprived communities and areas.</i></p> <p><i>In terms of health and equalities it may be more beneficial to extend the length of time for marketing to ensure that the site is no longer suitable for employment generating uses, before allowing residential use into areas previously used for business or industrial uses (B1). Allowing more residential use of sites may also result in increased demand for infrastructure. In terms of economy and given the current recession it may be more beneficial to extend the length of time for marketing to ensure that the site is no longer suitable for employment generating uses. However, equally retaining empty commercial or business sites for extended periods of time is not financially viable for landowners and the wider economy (for example much needed house building could spark localised economic growth). Increasing the length of time for marketing may delay regeneration when it is clear there is no demand for business use on sites. In these situations, increasing the marketing time would be contrary to SA Objective 17.</i></p>
<p>ED5 - Railway arches</p>	<p>(1) <i>only allow industrial uses and/or car parking in the arches.</i></p>	<p><i>It is considered that this alternative would be contrary to other Council policy on discouraging private vehicle car use. In terms of SA Objectives 1 and 16/18 (crime and the economy), it is considered that the proposed policy approach provides more positive effects on crime reduction, fear of crime, and sustainable and prosperous economy than these alternative approaches. These limited uses of the arches are not considered the most efficient or innovative uses of railway arches which could otherwise be used for a wider range of uses (including creative arts) that would be more beneficial to local communities, particularly those areas seeking regeneration.</i></p>
<p>ED6 – Town centres</p>	<p>(1) <i>The RA for policy ED6 Town Centres is to not require re-provision on affordable terms for independent shop premises as part of major redevelopment;</i> (2) <i>whether each town centre should have its own policies tailored to its</i></p>	<p><i>It is considered that this alternative would likely result in adverse impacts on several SA Objectives including 2, 3, 5, 7, 16, 17 and 18. Adverse effects would be likely in terms of accessing local food (particularly of different cultures), reduced social cohesion and connectedness of residents to their local centre, and adverse secondary effects associated with loss of local independent businesses. Town centres usually have good transport links and it is therefore preferable that small independent shops fulfilling local needs are provided in such centres. These smaller independent shops often promote interactions between different sectors of community and contribute to long-</i></p>

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	<p><i>own needs or;</i></p> <p>(3) <i>whether to take the more traditional approach of having policies for town centres which were applied borough-wide.</i></p>	<p><i>term social cohesion, sustainable lifestyle and sense of place of our local town centres. The analysis of centres in the Lambeth Retail Study demonstrates the important role independent traders play in providing diversity and maintain the health and vitality of centres. It is considered that this alternative would likely result in adverse impacts on SA Objective 18 as it could result in worklessness and liquidation / bankruptcy of locally owned and run business. The alternative is unlikely to result favourably in improved social performance of business. Loss of independent shop premises would likely reduce diversity, detract from a dynamic local economy and adversely affect communities socially. It is considered that this alternative would likely result in adverse impacts on SA Objective 17 as it does not maximise benefits to most deprived area and communities who may rely on such independent shops for particular local services / goods.</i></p>
<p>ED7 – Evening economy and food and drink uses</p>	<p>(1) <i>Clause (c) to any major or district centre rather than just Waterloo and Vauxhall Opportunity Areas.</i></p> <p>(2) <i>To allow different percentage thresholds in different parts of the Borough.</i></p> <p>(3) <i>To allow a higher percentage of food and drink uses on ground floor units in primary shopping areas (i.e. increased from 25% frontages). It was considered however that most of Lambeth's town centres had totals for A3/A4/A5 uses which were well below this threshold and that raising the threshold for these centres were unnecessary. The only exception was Clapham High Street where the limit had been reached some years ago.</i></p> <p>(4) <i>Lowering the thresholds but considered that this was too restrictive approach and might lead to more vacant units appearing in town centres if further A3/A4/A5 uses were not allowed to locate there.</i></p> <p>(5) <i>Whether to tailor individual</i></p>	<p><i>Effects of the first alternative would mean there would be less control on the number of food and drink uses in major and district centres in the Borough which may have detrimental effects for SA Objectives 1, 2, 3, 7, 16.</i></p> <p><i>The second alternative was dismissed as being too difficult/complex and had no supporting evidence base. However since the draft Local Plan an evidence base has been produced which supports different percentage thresholds for different parts of the borough. This approach results in more positive effects for each place / neighbourhood / town centre in the borough as it recognises existing individual issues for each centre, for example, food and drink uses are at saturation point in Clapham and no further pubs and drinking establishments should be permitted. Any increase in food and drink uses would likely alter the built environment, particularly through use of pavements and public realm (e.g. cafés and pubs). Secondary effects associated with littering and the way people use public spaces adjacent to food and drink establishments (for example smokers) would also impact on the character of the built environment. It is considered that the proposed policy approach is likely to result in more positive effects for the specific town centres than the previous Draft Local Plan policy approach (which had a blanket approach across all town centres). In terms of SA Objective 16 these alternatives may impact on town centre viability, and any proposed policy should be informed by robust and up-to-date evidence base. In terms of SA Objective 18, the alternatives may effectively tackle worklessness and the food and drink, and night time economy does employ significant numbers of people. A tailored approach for individual town centres is more likely to result in more positive effects, and more likely to mitigate potential negative effects specific to each different town centre.</i></p>

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	<p>(6) <i>policies for different town centres formulate alternative policies for A3, A4 and A5 uses, recognising that their function in a town centre was different.</i></p>	
<p>Draft Local Plan policy ED9 – Hot food takeaways (now incorporated into policy ED7 evening economy and food and drink)</p>	<p>(1) <i>to not have a policy on this issue at all and;</i> (2) <i>to apply it in town centres.</i></p>	<p><i>In terms of SA Objective 2, it is considered important to control hot food takeaways near schools. Further, the SA has identified that the policy should apply in town centres as most schools are located near to town centres. Similarly, it is considered that town centres are large enough for A5 uses to still locate within town centres but also be at least 400m away from primary or secondary schools. Therefore, in terms of SA Objective 2, it is considered that the RA to apply the policy within town centres would result in more positive effects with regards to health, particularly childhood obesity levels.</i></p> <p><i>It is considered the first alternative does not directly impact on SA Objectives 16 or 18. The second alternative may have a localised impact on the economy, but without further examination it is uncertain whether such impact would be significant.</i></p>
<p>ED9 – A2 Uses</p>	<p>(1) <i>to apply different percentages in different areas of the Borough and/or vary the definition of 'over concentration' (being defined as 25%).</i></p> <p>However <i>these approaches were dismissed by the policy team as too difficult and there is no supporting evidence base. A further alternative approach is to have a policy specifically on pawn brokers and betting shops. However, these are A2 uses and it would be difficult to enforce particular uses within the A2 use class</i></p>	<p><i>These approaches were dismissed as too difficult and there is no supporting evidence base. A further alternative approach is to have a policy specifically on pawn brokers and betting shops. However, these are A2 uses and it would be difficult to enforce particular uses within the A2 use class.</i></p> <p><i>In terms of SA Objective 7, policy ED9 can have a significant impact on sense of place of an area. Any increase on the current 25% threshold would need to be carefully derived in order to achieve the right balance of A2 uses to other town centres uses.</i></p> <p><i>It is considered probable that there is likely to be some effect of the alternative on SA Objectives 16 and 18. However, in the absence of an evidence base, it is difficult to determine the magnitude of any such impact. Therefore, effects of this alternative are considered uncertain. This also applies to the proposed Pre Submission policy approach which has redefined 'over concentration' to 15% or more of total ground floor units or 2 in 5 consecutive units.</i></p>
<p>ED11 – Hotels and other visitor accommodation</p>	<p><i>The alternative for policy ED12 is to not control the loss of visitor accommodation.</i></p>	<p><i>This would not necessarily result in more housing opportunity in the Borough.</i></p> <p><i>It is considered that effects of this alternative on SA Objective 7 would be de minimus. It may result in a different atmosphere in certain areas of the Borough and different times of day, for example fewer tourists perhaps, which may have secondary impacts on the local economy which in turn may change liveability and sense of place of particular areas.</i></p> <p><i>Given visitor accommodation needs to be located in areas of good public transport accessibility, any loss of visitor accommodation to a different landuse (for example mixed use development, residential, office, community etc) is likely to be in a location close to existing public transport. Accordingly, the alternative is unlikely to have significant adverse impacts on SA Objective 9, although any replacement use should be such that it maximises its public transport accessibility.</i></p>

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ED14 – Employment and training	<p>(1) <i>to require a financial contribution from developers for training schemes.</i></p> <p>However, this was dismissed as this would make the cumulative impact of policies unviable, and too onerous for the developer</p>	<p><i>If this could be a viable requirement in future, it is considered that such a financial contribution would have a positive impact with regards to SA Objectives 2, 5, 15 and 18 in particular.</i></p>
S3 - Schools	<p>(1) <i>to allow schools in KIBAs.</i></p>	<p><i>Given the nature of landuses in KIBAs and associated vehicle types that may be present (e.g. heavy lorries) this alternative may increase likelihood of accidental injuries to school children if schools are permitted in KIBAs particularly if the site is within a larger industrial area or part of the site remains in KIBA use. Also, effects of industrial processes and the like from business operations (e.g. noise, vibration, odour) may adversely impact on children and their concentration levels (depending on surrounding land use). Therefore, in terms of SA Objectives 1,2 and 7 the proposed policy approach likely results in less adverse effects than the identified RA. However, dependent upon the location of KIBAs to residential areas, this alternative may in some circumstances improve accessibility to schools for parents and school children with a reduced need to travel and therefore help promote more sustainable, healthier lifestyles (SA Objectives 2, 3, 5 9). This alternative may also provide more opportunities and a wider site selection for the new school placements so critically needed (SA Objective 4).</i></p>
T7 - Parking	<p>(1) <i>to devise our own parking standards rather than rely of London Plan parking standards.</i></p>	<p><i>If car parking numbers are significantly less than London Plan standards for developments then the alternative would be supportive of SA Objective 9. Parking numbers higher than London Plan standards may not be considered in conformity with a number of London Plan policies, and would likely result in significant adverse effects including on air quality, health and safety, climate change mitigation. Similarly, requiring higher numbers of disabled car parking would likely result in more positive effects in terms of accessibility, inclusiveness, equalities, but a balance would need to be struck to avoid underused land space.</i></p>
EN2 – Local food growing and production	<p>(1) <i>to not have a policy on food growing</i></p>	<p><i>It is considered this would be a lost opportunity with regards to SA Objectives 2, 3, 5, 7, 10, 11, and 17. The alternative would reduce extent of green infrastructure in the borough (and the many benefits this provides other than food – such as climate change mitigation and adaption, biodiversity, improved air quality), and does not maximise opportunity to innovatively address poverty and social isolation that communal food growing projects provide.</i></p>
EN7 – waste management	<p>(1) <i>to allocate sites for waste management rather than indicate broad locations (as proposed).</i></p>	<p><i>It is considered that the alternative risks blighting an area (which may in fact never be used by a waste operator) and this could have adverse impacts on local communities if pride of place and amenities are eroded. Sites identified by the Council may not be desirable to waste operators; similarly sites identified today may not be suitable to operators in future. Therefore, allocating sites for waste use may not most efficiently or effectively achieve SA Objective 13. In terms of SA Objective 4, it is considered more appropriate to provide more flexibility in site selection to waste operators, to provide a more effective waste service in the Borough.</i></p>

Table B below provides a review of approach for policies having no reasonable alternative identified. This is additional to Appendix XX which shows Core Strategy strategic objectives and strategic policies that have not been subject to a review of approach in the formulation of the Lambeth Local Plan 2013.

Table B: Review of approach for new policies having no reasonable alternative

Policy	Policy reason for no RA identified	SA review of approach
H10 – Gypsy and traveller needs	Being deterred to a Gypsy and Traveller DPD	Approach is considered reasonable and sufficient
ED3 – large offices	For reasons of sustainability and the need to locate high trip generating uses near to public transport hubs, thereby reducing or even eliminating the need to travel by car; no alternative was looked at.	Approach is considered reasonable and sufficient
ED4 – work-live development	Alternative policy approaches were not considered because these would potentially cut across the Council's employment protection policies	Approach is considered reasonable and sufficient
ED12 – Visitor attractions, leisure, arts and culture uses	These uses tend to be high trip generators and need to be near good public transport facilities, in areas such as Waterloo and Vauxhall Opportunity Areas and Brixton and Streatham town centres. For sustainability reasons no alternative approach was considered.	Approach is considered reasonable and sufficient
ED14 – Markets	The policy relates to matters that need to be considered when determining planning applications for markets. There are no reasonable alternatives to consider.	Approach is considered reasonable and sufficient
S1 – Safeguarding existing community facilities	There is a continuous need for community facilities in the borough, as population continues to grow and demand for social infrastructure grows with it. With this in mind no other policy approach, other than protected existing assets was considered.	Approach is considered reasonable and sufficient
S2 – new or improved community facilities	There is a continuous need for community facilities in the borough, as population continues to grow and demand for social infrastructure grows with it. With this in mind no other policy approach, other than promoting new assets was considered.	Approach is considered reasonable and sufficient
EN4 – Sustainable Design and Construction	Following London Plan approach so no alternatives were considered	Approach is considered reasonable and sufficient
EN5 - Flood risk	This policy is informed by an up-to-date SFRA and engagement with the Environment Agency so no alternatives were considered.	Approach is considered reasonable and sufficient
Q1 – Q27	The approach to tall building was not reviewed (in line with Core Strategy). Other policies cover detailed matters relating largely to the determination of planning applications and the appearance of new developments.	Approach is considered reasonable and sufficient
PN1 – PN11	Brixton and Vauxhall policies were the subject of review. The approach reflects the work done on the SPDs which involved extensive public consultation leading to a	Approach is considered reasonable and sufficient

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	consideration of alternatives approaches. New policies for Loughborough Junction and Upper Norwood were introduced due to public consultation responses.	
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