



# Sustainability Appraisal and SEA of London Borough of Lambeth Submission Core Strategy

Sustainability Appraisal Report

August 2009

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London Borough of Lambeth Local Development Framework  
Core Strategy  
**Sustainability Appraisal Report**

A report by **CAG Consultants and ENVIRON** for London  
Borough of Lambeth

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# Non-Technical Summary

## Background

The Lambeth Local Development Framework (LDF) will replace the current Unitary Development Plan adopted in 2007. The LDF is a collection of documents (Local Development Documents or LDDs) containing policies and proposals to guide future development in the area.

One of the key Local Development Documents within the LDF is the Core Strategy, which sets out the long term vision, objectives and spatial strategy for the future development of Lambeth.

As part of the preparation of the LDF the Council is required to undertake a process of Sustainability Appraisal. The appraisal has enabled the Council to take the social, economic and environmental implications of different policy options into consideration in developing their Core Strategy. This report describes the results of the Sustainability Appraisal process and how it has influenced the Core Strategy policies.

**Please note:** A separate set of appendices should be viewed alongside this summary report. These are:

- Appendix 1: Review of plans, programmes and policies;
- Appendix 2: Baseline data;
- Appendix 3: Policy appraisal matrices; and
- Appendix 4: Council's proposed response to the SA findings and recommendations.
- Appendix 5: Consultation audit.

## The appraisal process

Sustainability appraisal runs alongside the development of the LDD. This report describes the different stages of the process and the results. In summary these are:

<b>Plan Development Stage</b>	<b>Appraisal Stage</b>	<b>Where found in report</b>
Prior to drafting plan	Setting the context for the appraisal, collecting baseline information about the area, identifying sustainability issues/problems.	Section 3 and Appendices 1 and 2
	Developing a set of social, economic and environmental objectives for the appraisal (appraisal framework).	Section 3 and Appendices 1 and 2
Developing objectives for the plan	Testing the sustainability of plan objectives using the appraisal framework.	Section 5
Developing options for achieving these objectives	Testing the effect of the options using the appraisal framework.	Section 4
Developing a set of policies for the Core Strategy.	Testing the effect of the policies using the appraisal framework.	Section 5 and Appendix 3

### **The Sustainability Appraisal framework**

Analysis of other plans, programmes and policies, baseline data and identified social, economic and environmental issues has been used to develop a framework of sustainability objectives against which the plan and the options considered in the development of the plan have been tested. This framework of objectives is called the Sustainability Appraisal framework and it has been updated following consultation on the SA Scoping Report. The updated SA Framework is presented in the table below.

<b>The Sustainability Appraisal Framework</b>	
<b>SA Objectives</b>	
<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	
6. Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	
<b>ENVIRONMENTAL</b>	

8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.
14. Air quality. To improve air quality.
<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.

## The likely significant effects of the plan

The process of testing the policies looked at the most important or significant effects of the Council's Core Strategy policies on the key social, economic and environmental objectives which have been identified for the Borough (the Sustainability Appraisal framework). The details of this assessment are provided in Section 5 of the main report and Appendix 3. A summary of the key significant effects of the Core Strategy and proposed mitigation to offset negative effects is provided below. Other recommendations for the policies are included in Section 5.

### Vision and strategic objectives

The vision and strategic objectives 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 to tackle climate change (mitigation and adaptation), address infrastructure issues, provide local jobs and services and promote sustainable modes of travel. The vision and strategic objectives have taken on board many of the issues highlighted previously by the SA. However, there remain uncertainties about the delivery of essential infrastructure required for growth, in particular:

- Timing: there is a danger that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front;
- Funding (and land required?) for some of the proposed infrastructure schemes has not been identified (e.g. some of the school place provision);
- The proportion of open space per resident ('green infrastructure') is likely to reduce as the population increases whilst new open space opportunities are extremely limited.

The strategic objectives and Core Strategy policy should also target the regeneration of London Plan Areas of Regeneration.

### **Policy S1 – Delivering the vision and objectives**

The policy concerns the delivery of the Strategy's vision and objectives, including the social, green and physical infrastructure required to accommodate the proposed growth. It targets key areas of the borough to deliver development and regeneration, which scores well over the range of social and economic objectives. The intention to respect local distinctiveness scores well on protection of the built heritage. There is no detail in the policy on the suite of environmental objectives (including climate change), sustainable design or sustainable transport. Environmental standards/ targets are set to be addressed in other DPDs. However, there is an uncertainty regarding the delivery of much needed infrastructure, such as school places and health care provision, and what impact this might have on quality of life issues within the Borough. Greater specificity on infrastructure provision would be helpful in order to explain what improvements are necessary to enable the planned scale of growth to be delivered. Annex 2 could clarify whether proposed infrastructure schemes are in providers' programmes and whether they are funded. There is then the issue of how much growth/development could occur if the uncommitted schemes did not come to fruition.

### **Policy S2 - Housing**

The previous SA recommendation to add the affordable housing breakdown of 70% social housing and 30% intermediate provision to the policy has been taken on board. The policy sets out plans to deliver 7,700 net additional dwellings across the borough between 2010/11 and 2016/17 in line with London Plan targets, and a further 8,800 more homes by 2024/25. It is therefore difficult to differentiate between short, medium and long term as the benefits of housing provision and other benefits that will come with this, such as affordable housing provision and homes built to Lifetime Homes standards should be provided throughout this period of time. The policy is considered to support the achievement of SA Objectives relating health and well being, equality and diversity, built and historic environment, local economy, and regeneration and efficient use of land. The policy does not refer to sustainable construction but Policy S7 Sustainable Design and

Construction deals with some of these issues and the Development Management DPD will need to deal with these issues in detail. Although it is not recorded in the matrix, it should be noted that there could be some uncertainty relating to the delivery of housing by private house builders, due to the current market forces. However, this is beyond the control of the policy. It is assumed that Development Management policies and supporting SPD will address the potential impact of housing development.

### **Policy S3 – Economic Development**

The policy lends support to existing businesses, regeneration and employment programmes and therefore effects identified in the matrix in Appendix 3 should apply over the short, medium and long term. However, uncertainty has been identified, particularly in the long term, as market forces beyond the control of the policy will affect employment rates and the local economy. The policy performs well with regard to a number of the social, economic and environmental SA objectives, in particular with regard to objectives about tackling worklessness, regeneration and efficient use of land, local economy, education and skills, transport and travel, liveability and place and access and services. It also performs well in relation to air quality, waste, climate change and energy, built and historic environment, equality and diversity, provision of essential infrastructure, health and well being, and crime and safety.

The policy should make reference to seeking high quality public green space in connection with public areas such as in town centres and making use of previously developed land.

### **Policy S4 – Transport**

The policy performs well against the SA Framework, and in particular in relation to objectives about transport and travel, climate change and energy, air quality, and provision of essential infrastructure. The policy also supports the achievement of SA objectives relating to access and services, health and well being, liveability and place, built and historic environment, biodiversity, education and skills, local economy, regeneration and efficient use of land and tackling worklessness. The policy supports identified transport infrastructure programmes which will take place in the short term, such as the South London Route Utilisation Strategy (2008) and some underground upgrades (Victoria Line upgrade, Northern line upgrade part 1 and Vauxhall over-ground station platform improvements. Other infrastructure programmes / schemes referred to in the policy do not have funding in place and are longer term aspirations. These include the Cross River Tram, the Croydon Tramlink extension to Crystal Palace and the potential for an east London line station at Brixton. There is therefore some uncertainty recognised in the performance of the policy in the long term with regard to SA Objective Provision of Essential Infrastructure. Providing for a network of electric vehicle charging points and the need for development to provide travel plans or transport assessments in

accordance with the Transport for London requirements should be included within the Development Management DPD.

### **Policy S5 - Open space**

The appraisal team welcomes the inclusion of a green infrastructure core policy which addresses biodiversity, trees and open space together, across the whole Borough. The policy performs well against most of the social, economic and environmental objectives in the SA Framework, in particular, biodiversity, climate change and water resources and flood risk management. Effects on biodiversity are recorded in the matrix (see Appendix 3) as more positive in the medium and long term as it is recognised that it may take a couple of years for new green roofs and other green spaces to be developed and to become established. Similarly, for other SA Objectives, the effect identified in the short term is neutral, such as for climate change and water resources, as the delivery of new open space and green roofs may take a few years to be put in place. Access to green space for people of different abilities / ages etc is not mentioned within the policy and it should be made clear how this will be dealt with.

### **Policy S6 –Flood Risk**

This policy contributes to the achievement of a number of the SA Objectives with regard to water resources and flood risk management. In line with the SFRA the policy sets out how flood risk will be managed in accordance with PPS25 and how the sequential test will be applied. The policy has been made more robust through consultation with the Environment Agency. For example, it now seeks to steer development towards areas of lowest flood risk which is an improvement on the Draft Core Strategy policy, which was not as explicit with regards to sequential testing. There is some uncertainty in the short term as improvements of flood defences (particularly on the banks of the River Thames) and the delivery of new SUDS / water attenuation measures are dependent on new development and it is therefore not certain that these will be delivered in the short term. It is recommended that the Development Management DPD includes the avoidance of pollution and the protection of water quality within policy.

### **Policy S7 – Sustainable Design and Construction**

The policy amalgamates previous Draft Core Strategy policies S11 Sustainable Design and Construction and S9 Sustainable Energy Use, with some other additions / alterations. The policy should have a positive performance with regard to most of the SA Objectives, although there is uncertainty because the policy itself does not set out any targets or specific requirements (apart from making reference to London plan carbon reduction targets), but instead these will be detailed within a Development Management DPD and/or relevant SPD. Uncertainty particularly applies in the short term because the Development Management DPD and SPD will be adopted after the Core Strategy.

## **Policy S8 – Sustainable Waste Management**

The policy sets out measures to ensure adequate land and facilities for waste management over the LDF period, however it does not set out in detail how waste will be managed in a sustainable manner. Cross reference is required to another policy or document which sets out what adequate facilities might be – will this be in the Lambeth Waste Strategy or the Sustainable Design and Construction SPD? The location of new waste management sites will be allocated through an allocation DPD and are as yet unknown. The performance against the air quality objective (no. 14) is uncertain as the impact of this policy on transport is unknown (although the policy does set out some requirements relating to the location of new waste management sites which includes rail and water access) and it is also unclear whether the types of waste management facility to be developed in the Borough could have any positive or negative effect on local air quality. The policy should make reference to achieving the waste management targets of the London Plan, such as achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and 80% recycling of that waste as aggregates in London by 2020)

## **Policy S9 – Quality of the Built Environment**

Several of the SA recommendations previously made (in relation to Draft Core Strategy policy S12 Quality of the Built Environment) have been taken on board within the Submission Core Strategy policy S9 Quality of the Built Environment, which has improved the performance of the policy. The policy generally performs well against the social and economic SA Objectives and performs very positively with regard to crime and safety, health and well being, liveability and place, built and historic environment, transport and travel and local economy. The policy also contributes positively to access and services, equality and diversity, biodiversity, regeneration and efficient use of land and tackling worklessness. The policy is deemed to have a neutral performance with regard to climate change and energy, water resources and flood risk management, air quality and waste because although these issues are generally covered by other core policies and forthcoming DPDs, there is an opportunity to link these issues with good design in this policy. The Development Management DPD should refer to the need to design/ retrofit new/existing buildings to cope with future climates, particularly in relation to impacts other than flooding.

## **Policy S10 – Planning Obligations**

The policy paves the way for the preparation of a Planning Obligations SPD. The policy performs well against objectives which relate to provision of services and facilities, health and well-being, transport and other essential infrastructure because there is some confidence that these will be included within the Planning Obligations SPD. There is potential for positive effects against a number of other objectives such as in relation to biodiversity, crime and safety, built and historic environment, climate change and energy, liveability and place, water resources and flood risk management, waste, education and skills and tackling worklessness.

The policy does not set out the types of projects, facilities, services etc that contributions may be put towards and therefore the appraisal records some uncertainty. There is some uncertainty in the short term as benefits of the policy will be dependent on development coming forward, and therefore it could take a few years for benefits to be realised.

A number of recommendations have been identified to improve the policy and to be taken into consideration in the preparation of the Planning Obligations SPD and in the area based SPDs.

### **Policy PN1 Waterloo**

Whilst the policy scores well on the social and environmental SA objectives, including transport and the built environment, it could give more attention to the needs of identified equality target groups. There are a number of issues relating to some of the environmental objectives where the policy could be tightened up or clarified, in particular waste management and retrofitting existing buildings to help tackle climate change. Recommendations are made to improve the impact of the policy.

### **Policy PN2 Vauxhall**

The policy aims to deliver London Plan targets for 3,500 new dwellings and 8,000 new jobs in a London Plan Opportunity Area. Therefore, it scores positively on issues relating to health (as homes and jobs are key determinants of health), housing, liveability and economic issues. The main concern with the policy is whether the new jobs proposed are capable of being supported by concomitant public transport capacity and improvements. The policy is far less convincing than the Waterloo policy in terms of enabling essential infrastructure (physical, social) to keep pace with growth: it may improve access to jobs and housing – but there is little detail on other essential infrastructure such as schools, health facilities and services, water and sewerage. If the policy results in greater road travel, particularly private car use it could worsen existing congestion and contribute to air quality and climate change problems. There is no reference to waste management facilities: whilst the area is not a Preferred Industrial Location in the London Plan, it presumably is a Local Employment Area and therefore would be suitable (in London Plan terms) as a broad location for much needed waste management facilities. The area falls within Flood Zone 3a and therefore we would expect reference to flood risk and the need to maximise opportunities to strengthen defences when opportunities arise. It also fails to address the issue of retrofitting: how the bulk of the areas existing buildings will reduce their impact on carbon emissions. In addition, the area lies within a London Plan Area for Regeneration, meaning it suffers some of London's/Lambeth's worst levels of deprivation: this status should be referred to with the associated London Plan policy 2A.7 requirements (these include improvements to learning and skills, health, safety, access, employment, environment and housing). Although the supporting text to the policy refers to the area supporting a number of gay

nightlife venues, the needs of this and other equality target groups are not referred to in the policy.

### **Policy PN3 Brixton**

Generally this policy scores well across most objectives. In strengthening Brixton's role as a town centre, with an increased offer related to employment (including cultural and green businesses), housing and various town centre facilities, it should reduce people's need to travel more widely. In addition, the commitment to an energy strategy, the promotion of green businesses, and the adoption of 'One Planet Living' principles should all help to make Brixton a sustainable centre (and we note local initiatives such as 'Brixton Green' and 'Transition Town Brixton', which should assist in the development of this new green identity).

The only significant negative involves a question mark over the provision of appropriate physical and social infrastructure to support its expanded role. There is a need for more school places in Brixton, yet the policy does not address this issue. It also omits to address issues around water infrastructure. Climate change adaptation is not addressed, nor is the built/historic environment particularly well dealt with.

### **Policy PN4 Streatham**

The policy scores negatively, or uncertain, on a number of objectives due to lack of attention to: energy and climate change (mitigation or adaptation), physical and social infrastructure, the needs or equality target groups, sustainable design and construction, water issues, waste management, training and skills, and child care facilities. The policy aims to strengthen the retail and entertainment offer, but appears to provide little else for local people. The main concern is that existing road traffic problems will worsen and the proposals will foster greater reliance on the private car, thus worsening congestion and air quality issues.

### **Policy PNS Clapham**

The policy seeks limited change in seeking to reinforce the character and nature of the area. There will be some limited social benefits, but there is no reference to a suite of environmental issues. The Submission version has improved policy content in relation to local transport improvements.

### **Policy PN6 Stockwell**

The policy scores positively on many of the social objectives, as its main focus is in improving the local environment of existing housing estates. Public transport is already good and although the policy seeks to retain existing employment and seek opportunities for new jobs, it is likely that the vast majority of working residents will still commute out of the area to work. The vast majority of these journeys are by public transport.

### **Policy PN7 Oval**

The main focus of the policy is to secure enhanced local community benefits from The Oval Stadium: therefore it scores positively on most social objectives, given it lies in a London Plan Area for Regeneration (area of high deprivation). However, more detail on the need for various social infrastructure (e.g. schools, health care etc) would be desirable. The policy scores less well on the environmental sustainability objectives, where there is no mention of issues around climate change (mitigation or adaptation), water conservation or waste management. As the area lies in Flood Zone 3a, the policy should reference flood risk issues and opportunities.

### **Policy PN8 West Norwood and Tulse Hill**

The policy scores well on a range of social and economic objectives, especially in terms of providing a wide range of community facilities, including meeting educational and training needs. Transport is likely to remain an issue in an area currently suffering heavy congestion and with few significant transport proposals to improve the situation: again, this is likely to have a knock on impact on air quality. Whilst there is mention of the creation of local energy CCHP energy networks – which is very welcome – other aspects of environmental sustainability (sustainable design and construction, water and waste issues, climate change adaptation) are missing. This may result in missed opportunities, e.g. in the construction of new sustainable schools, provision of much needed waste management facilities within the commercial areas or in retrofitting housing estates as part of refurbishment programmes. Again, child care facilities are ignored. Whilst the issue of housing conversions is raised in the supporting text, this is not supported by any policy content.

### **Policy PN9 Herne Hill**

The policy seeks to develop the area as a community focussed district centre, with relatively modest proposals that revolve around improvements to the public realm and transport (including road junction improvements) and maintenance of retail. There is insufficient detail in the policy to enable many of the objectives to be scored positively: many have been left as uncertain, whereas others have been scored negatively as it is unlikely that the policy would make a positive contribution to tackling significant social and environmental issues.

### **Policy PN10 Local centres**

The policy is aimed as a general catch all for other parts of the borough not addressed by the specific area policies. However, there is insufficient information to make a judgement on many of the objectives. In as much as local centres are supported, then this may contribute to greater local access to a (limited?) number of services and facilities: as such there may be benefits in terms of reducing the need to travel (and knock on benefits for CO<sub>2</sub> emissions and air quality).

## Proposals for monitoring

Lambeth Council will include significant sustainability effects in future Annual Monitoring Reports for the LDF. The significant sustainability effects indicators have been drawn from the issues identified from the baseline data review and are linked to the potential adverse effects identified within the appraisal of policies. The indicators aim to:

- Concentrate on the key sustainability issues identified in the appraisal;
- Provide information to identify when problems, including unexpected ones, arise; and
- Contribute to addressing gaps in data availability identified in this appraisal.

Monitoring will allow the Council to identify whether the recommended mitigation measures from the SA have been effective and develop further mitigation proposals that may be required where unforeseen negative effects are identified. In some cases monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the Core Strategy, or for further policy guidance to be developed (for example an SPD).

The table below sets out the agreed monitoring indicators.

### Monitoring Indicators

Issue	Potential Monitoring Indicators
<b>Contextual indicators based on key issues identified in the Scoping Report (indicators highlighted in green are included in the LDF Annual Monitoring Report, with reference number shown)</b>	
Access to good, affordable housing.	COI H5 – Gross affordable housing completions LOI 2 – Number of new-build affordable dwellings completed LOI 3 – Proportion of all new-build dwellings completed (on sites to which Policy S3(d) applies) that are affordable Housing need in relation to NI 155 (number of affordable homes delivered) and information on changing needs. COI H1 - Plan period and housing targets COI H2(a) – Net additional dwellings in previous years COI H2(b) – Net additional dwellings for the reporting year COI H2(c) – Net additional dwellings in future years COI H2(d) – Managed delivery target  COI H6 – Housing quality building for life assessments Percentage of new homes built to Lifetime Homes standards.
Housing mix and types.	LOI 4 – Proportion of completed homes with 3 or more bedrooms COI H4 – Net additional gypsy and traveller pitches
Infrastructure provision, including healthcare services	LOI 12 - Level and type of planning obligations received Annual update of infrastructure programmes schedule

and facilities; and schools	
Cohesive communities and meeting the needs of diverse communities.	Index of multiple deprivation
Tackling crime and addressing fear of crime.	Number of criminal offences
	LOI 11 – Percentage of planning approvals for ten or more residential units receiving Secured by Design accreditation
Good local access to services and facilities.	Proximity of housing development to services, facilities and employment
Increasing jobs, particularly local jobs for local people.	Overall employment rate
	Jobs density
Addressing high rates of child poverty.	Children in poverty
Economic development	Net additional serviced bedrooms (visitor accommodation).
	New business registrations
	Proportion of major office development in preferred locations
	COI BD1 – Total amount of additional employment floor-space, by type
	COI BD 2 – Total amount of employment floor-space on previously developed land, by type
	COI BD 3 – Employment land available, by type
Viable, safe and well managed town centres	Road traffic casualty rates
	Retail vacancy in town and district centres
	COI BD 4 – Total amount of floor-space for 'town centre uses'.
Reducing CO <sub>2</sub> emissions and the efficient use and management of energy.	COI E3 – Renewable energy generation
	NI 186 Per capita CO2 emissions in local authority area.
Climate change adaptation, including flood risk management	COI E1 – Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.
Tackling congestion and increasing public transport use, cycling and walking.	Main mode for journey to work
	The numbers of 'Green Travel Plans' submitted for large/major developments
	LOI 6 – Number of passengers using rail and underground stations
	School travel
	Car ownership
	LOI 7 – Public Transport Accessibility Levels

Efficient use and management of resources.	COI H3 – New and converted dwellings on previously developed land
	COI BD2 Total amount of employment floorspace on previously developed land, by type.
Efficient use and management of water.	COI E1 – Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds
Pressure on biodiversity	Percentage increase / decrease in Local BAP habitats (ha)
	COI E2 – Change in areas of biodiversity importance.
Pressure on open spaces	Unrestricted open space per 1,000 persons
	LOI 8 (and LAA stretch target) – Parks with Green Flags awards
Improving air quality (and meeting EU targets).	Concentrations of nitrogen dioxide and fine particulates
Addressing health inequalities	Life expectancy of males and females
	Deaths from heart disease < 75 years for males and females
Sustainable waste management	COI W1 – Capacity of new waste management facilities
	COI W2 – Amount of municipal waste arising and managed, by management type

**Significant effects indicators (indicators highlighted in green are included in the LDF Annual Monitoring Report, with reference number shown)**

Biodiversity	Percentage increase / decrease in Local BAP habitats (ha)
	COI E2 – Change in areas of biodiversity importance
Tackling climate	NI 186 – Per capita CO <sub>2</sub> emissions in local authority area

change and reducing greenhouse gases	
Water conservation	COI E1 – Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds. (see also Sustainable Design and Construction below)
Flood risk management	COI E1 – Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.
Sustainable waste management	COI W1 – Capacity of new waste management facilities COI W2 – Amount of municipal waste arising and managed, by management type
Air quality	Concentrations of nitrogen dioxide and fine particulates
The setting of historical assets and impacts on townscape/cityscape and valued views	LOI 9 – Number of listed buildings and buildings on 'at risk' register LOI 10 – Number of conservation areas with up to date character appraisal
Sustainable design and construction	Percentage of Homes given planning permissions achieving Code for Sustainable Homes levels 3, 4, 5 and 6 (to be revised in 2013) Percentage of Non-residential development given planning permission achieving BREEAM 'Excellent' and 'Very Good' scores.

## The difference the SA process has made to date

This report sets out our findings and recommendations of the appraisal of the Proposed Submission Core Strategy. The Council have considered these recommendations presented in this SA Report and have made amendments accordingly: the Council's proposed response to recommendations made on the Submission Core Strategy is set out in Appendix 4 (a separate document).

Some key changes have included:

- Affordable housing breakdown proportions of 70% social housing and 30% intermediate provision have been taken on board;
- References to London Plan Areas of Regeneration have been added;
- The vision and objectives have been revised regarding ethnic and faith groups;
- Added references to ensure development is designed to take account of the impacts of climate change over its lifetime;
- Improvements in relation to protection of biodiversity in new development, plus the incorporation of ecological features into the public realm;
- Greater support for the waste hierarchy and in particular the efficient use of resources, the reuse of materials and resources, and the recovery of energy from materials;

- Ensuring that improvements to the quality of the public realm are child-friendly and encourage physical activity;
- Ensuring that safe and attractive pedestrian and cycle routes within and through neighbourhoods are linked to green spaces and public transport nodes and interchanges.

### **Delivery and implementation**

More detailed policies and guidance will be contained in other LDF documents to be prepared after the Core Strategy and in accordance with it. These will include:

- A Site Allocations DPD – this will identify the sites required to achieve the spatial strategy set out in the Core Strategy;
- A Development Management DPD (DM DPD)– this will set out detailed policies for the management of development in the borough
- Supplementary Planning Documents (SPDs)– these will elaborate on particular aspects of policy in the Core Strategy and DM DPD

These documents will be important in terms of addressing a number of key infrastructure and target issues including:

- Identifying sites for essential infrastructure, including schools, through the Site Allocations DPD and other means as appropriate;
- Land will be safeguarded for existing and future public transport infrastructure where necessary through the Site Allocations DPD and other appropriate means;
- Setting Lambeth specific targets on environmental performance. More specific targets will be set out in the Development Management DPD and detailed guidance will be provided in a Supplementary Planning Document
- Additional sites for both sustainable waste management use and operational use will be allocated in the Site Allocations DPD (3.7 hectares of extra land required).

Annex 2 of the Core Strategy ('Infrastructure Programmes and Schedule') sets out various infrastructure requirements and proposals, some of which do not have current funding e.g. new primary schools. It is important that infrastructure keeps pace with proposed growth. Ideally, essential social and physical infrastructure needs to be phased up front.

In relation to environmental standards, such as energy and CO<sub>2</sub> emissions, we note that PPS1 Climate Change Supplement encourages a proactive and evidence based approach to tackling climate change through local authority Core Strategies:

*In developing their core strategy and supporting local development documents, planning authorities should provide a framework that promotes and encourages renewable and low carbon energy generation. Policies should be designed to promote and not restrict renewable and low-carbon energy and supporting infrastructure.*

In relation to Policy S7, the Core Strategy states that '*more specific [environmental performance] targets will be set out in the Development Management DPD and detailed guidance will be provided in a Supplementary Planning Document*'. PPS1 Supplement on Climate Change states that LPAs must be able to demonstrate clearly the local circumstances that their approach to energy target setting.

# 1. Introduction

## 1.1 Background

The preparation of the Lambeth Local Development Framework (LDF) Core Strategy has been subject to an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in line with the requirements of:

- Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004 (which requires a environmental assessment to be carried out on certain plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment); and
- The Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12 (PPS12) (which requires Sustainability Appraisal (SA) of all emerging Development Plan Documents and Supplementary Planning Documents).

The Sustainability Appraisal is being carried out by CAG and ENVIRON using a team of consultants experienced in SA and SEA of local authority spatial planning documents.

This report is the final Sustainability Appraisal (SA) Report of the Lambeth Local Development Framework Submission Core Strategy. It presents the results for the whole SA process including information gathered, the method used and the results of appraisal of the Core Strategy as it has developed to date.

## 1.2 What is Sustainability Appraisal?

Sustainability Appraisal should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability Assessment should inform the evaluation of alternatives. Sustainability Assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.

*Planning Policy Statement 12 – Local Development Frameworks (June 2008)*

The aim of Sustainability Appraisal is to make sure that plans are doing as much as they can to support the delivery of social, economic and environmental objectives at the same time. Although planning authorities do their best to address these issues, it is easy to miss opportunities for better supporting social, economic and environmental objectives, and for reducing any conflicts. Sustainability Appraisal offers a systematic way for checking and improving on plans as they are being developed. Ideally, as a result of the appraisal, conflicts with sustainability objectives will be removed, but this is not always possible. The conflicts and the decisions made must be explained in the SA report. As a result the public and other stakeholders will find it easier to appreciate the pros and cons of the plan and to make up their own minds about whether the planning authority has made good decisions.

### **1.3 Purpose of the Sustainability Appraisal**

The purpose of the Sustainability Appraisal is to promote sustainable development by integrating sustainability considerations into the plan making process. This is done through a number of stages:

- The production of an SA scoping report (in October 2008), which examined the sustainability issues in the area. The issues identified in the scoping report were used to produce a Sustainability Appraisal framework against which the plan could be measured. The scoping report can be accessed here:  
<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/LocalDevelopmentFramework%28LDF%29-SustainabilityAppraisalScopingReportConsultation.htm>;
- Appraisal of the issues and options assessment and the production of a briefing paper which outlines the results of the Sustainability Appraisal of the LDF Core Strategy issues and options report (see below for more details). The SA team examined the sustainability effects of the issues and options put forward for consideration and a briefing paper provides recommendations to the Council officers as to how to develop the Core Strategy in a sustainable manner. This briefing paper has not been subject to consultation but the results of the appraisal of issues and options are presented within Section 4 of this report.
- The appraisal of the draft Core Strategy and preparation of the SA report (the formal SA report under the terms of the SEA Regulations). The results of the draft Core Strategy appraisal were used by the council to develop the final submission draft of the plan.
- This SA Report on the Submission Core Strategy was prepared following consultation in April and May 2009 on the preferred option Core Strategy and

its accompanying SA. This SA Report will be submitted with the Submission version of the Core Strategy.

- There were a few changes made to the Submission Core Strategy text between August 2009 and October 2009 as it passed through Council Cabinet: we have assessed these changes and concluded that none were significant enough to have any impact on the SA.

## 1.4 The Lambeth Local Development Framework

Spatial planning in Lambeth is currently guided by *The London Plan* (consolidated with Alterations since 2004, published February 2008) and *Lambeth Unitary Development Plan* (2007). The process is also influenced by a variety of specific strategy and policy documents at the national, regional and local level which relate to specific issues such as employment land, open space, biodiversity etc.

The Government has introduced comprehensive changes to the development planning system via the Planning and Compulsory Purchase Act 2004. Under the terms of this Act, Local Planning Authorities (LPAs) are obliged to replace their adopted Local Plans with new-style plans, to be known as a Local Development Framework (LDF).

Local Development Frameworks comprise of a series of Local Development Documents. Local Development Documents include Development Plan Documents (DPDs), which are part of the statutory development plan, and Supplementary Planning Documents (SPDs), which expand on policies set out in a DPD or provide guidance for the development of sites or areas.

The London Borough of Lambeth has begun the preparation of the Local Development Framework (LDF) Core Strategy and Site Allocations Development Plan Documents (DPDs). The Development Control Policies (Development Management) and the Proposals Map DPDs will be progressed when the Core Strategy has reached a more advanced stage. Collectively, these will perform the role of the spatial planning framework for the area. Figure 1.1 shows the Local Development Framework and how it relates to other planning policy.

The Core Strategy is the first and most important document in the LDF 'folder' of Development Plan Documents (DPDs). It sets out:

- the national, regional and local policy context;
- the evidence base and a summary of the spatial issues affecting the borough;
- the spatial strategy, vision and strategic objectives to be achieved;

- a limited number of strategic policies that provide a framework for the spatial strategy;
- policies for shaping individual places and neighbourhoods; and
- the process and mechanisms for delivery and monitoring of the strategy.

More detailed policies and guidance will be contained in other LDF documents to be prepared after the Core Strategy and in accordance with it. These will include:

- A Site Allocations DPD – this will identify the sites required to achieve the spatial strategy set out in the Core Strategy;
- A Development Management DPD (DM DPD) – this will set out detailed policies for the management of development in the borough; and
- Supplementary Planning Documents (SPDs) – these will elaborate on particular aspects of policy in the Core Strategy and DM DPD.

## **Vision and strategic objectives**

The Spatial Vision for the Core Strategy is:

By 2025 Lambeth will be a key part of, and contributor to, central London's thriving economy and the benefits of this will be shared throughout the borough. It will be home to a skilled workforce and a growing number of businesses and jobs providing opportunities for local people. The achievements of Lambeth's young people will be widely celebrated and the levels of worklessness in the borough will have significantly declined. Lambeth will be at the forefront of tackling and adapting to climate change.

At least 16,500 additional dwellings will have been developed along with additional shops, offices and visitor accommodation. Fifty percent of new residential dwellings will be affordable. Growth in housing and jobs will be mainly focussed on the Waterloo and Vauxhall (linked to Battersea/Nine Elms) Opportunity Areas and the major town centres of Brixton and Streatham.

This growth will be supported by approximately 5,460 additional primary school places and 2,294 additional secondary school places, a network of new Neighbourhood Resource Centres for primary health care, reconfigured hospital and further education premises and new facilities for policing across the borough. The capacity of the public transport infrastructure, including the inter-changes at Waterloo, Vauxhall and Brixton, will have increased sufficiently to accommodate all those travelling to, from and through the borough for work, shopping, recreation and tourism.

Lambeth will be known for its flourishing and distinctive business neighbourhoods in Waterloo, Vauxhall, Brixton, Streatham, Clapham, Oval, Stockwell, Herne Hill and Tulse Hill/West Norwood, for its cutting edge culture and creativity, its access

to the River Thames and to views of central London, and its international cultural and tourist destination on the South Bank. There will be a world class new public open space at Waterloo City Square.

Lambeth's residential neighbourhoods will house mixed, cohesive, stable communities that thrive on the diversity of their population, including different ethnic groups, faiths and sexual orientations, the young, the elderly and people with disabilities. They will be green, safe, accessible areas that enable healthy and sustainable lifestyles and foster well-being. Although high in density, they will excel in the sustainable design and management of their built environment and public spaces, with a strong focus on liveability, community safety, enhanced historic buildings and spaces with an improved sense of place.

This vision will be delivered jointly by the partners of Lambeth First through its theme partnerships, strategies and programmes and in consultation with all stakeholders, supported by the policies contained in this Core Strategy and Lambeth Council's powers as a local planning authority.

This is supported by a number of strategic objectives:

**A. Accommodating population growth**

1. Increase the overall supply of housing by at least 16,500 additional dwellings, and increase mix and quality of housing (including affordable, key worker and family housing) to meet demand identified through the Strategic Housing Market Assessment.

**B. Achieving economic prosperity and opportunity for all**

2. Support the growth of key economic sectors through the development of new shops, offices and visitor accommodation, by maintaining a varied supply of business premises and through plans for town centre regeneration.

3. Increase the number and variety of job opportunities for local people by protecting land for commercial use within neighbourhoods and seeking contributions to employment and skills support programmes.

**C. Tackling and adapting to climate change**

4. Reduce carbon emissions by minimising the need to travel and maximising energy efficiency and renewable energy generation in buildings and area regeneration schemes.

5. Safeguard and increase biodiversity through co-ordinated implementation of the Lambeth Biodiversity Action Plan.

6. Enable Lambeth to adapt to the effects of climate change, including drought and flood risk, through the design of the built environment, retention of existing trees, urban greening, and sustainable urban drainage and protection of the supply or water.

#### **D. Providing essential infrastructure**

7. Provide the essential physical, social and green infrastructure to support population and economic growth through the co-ordinated delivery of infrastructure programmes by Lambeth First partners and statutory undertakers.

8. Work in partnership with government, Transport for London, Network Rail and major developers to increase public transport capacity and accessibility, reduce reliance on the private car, promote walking and cycling, and provide alternatives to road-based freight transport.

9. Provide approximately 5,460 new primary school places and 2,294 new secondary school places of good quality to meet existing and future demand in Lambeth, by enabling a supply of land for new schools and seeking contributions to education from developers of family housing; and support the reconfiguration of further education premises.

10. Contribute to improving health and well-being and reducing health inequalities by delivering a network of Neighbourhood Resource Centres for primary health care, supporting the reconfiguration of hospital premises, and by encouraging healthy lifestyles in the design of the built environment.

11. Increase the quality of open space in Lambeth by safeguarding, linking and upgrading existing open space, improving access and retaining existing trees (through delivery of the Lambeth Open Spaces Strategy), and seek new open space where-ever possible including through an extension to Jubilee Gardens.

12. Contribute to the delivery of Lambeth's Sustainable Waste Management Strategy by maintaining an appropriate supply of land for waste management and operational use and seeking the most effective waste management facilities within new developments.

#### **E. Promoting community cohesion and safe, liveable neighbourhoods**

13. Develop and sustain stable neighbourhoods with a high quality, liveable residential environment, respect for local amenity, good access to local services and transport, and mixed populations (including different ethnic groups, faiths and sexual orientations, the young, the elderly and people with disabilities).

14. Increase community safety and resilience to terrorism by designing out crime and fear of crime in the built environment and through joint working within the Safer Lambeth Partnership.

#### **F. Creating and maintaining attractive, distinctive places**

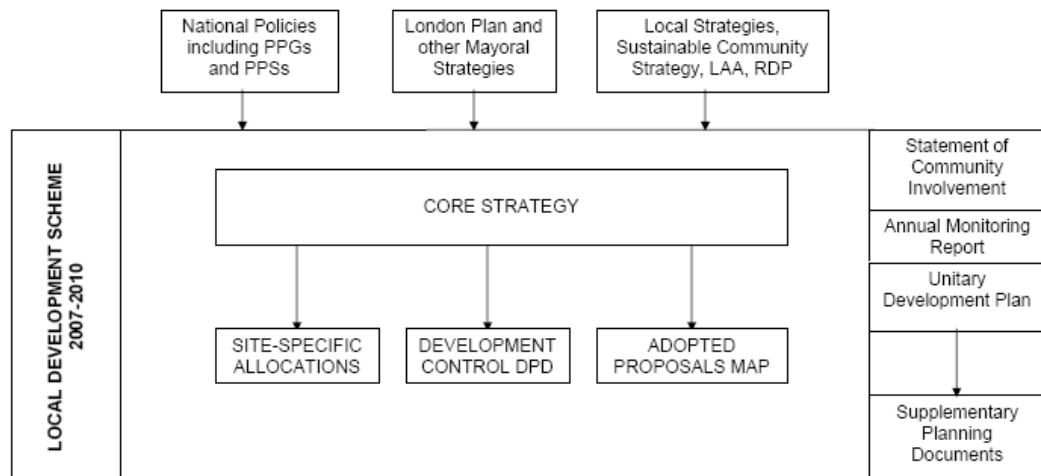
15. Create and sustain distinctive local places through excellent design of buildings and the public realm, valuing heritage, identity, cultural assets and the natural environment.

16. Protect and enhance the historic built environment, the setting of the Palace of Westminster World Heritage site and strategic views by working in partnership with English Heritage, neighbouring boroughs and community groups.

17. Support the regeneration and renewal of the London Plan Opportunity Areas at Waterloo and Vauxhall/Nine Elms/Battersea to reflect their role in central London, working in close partnership with the neighbouring boroughs of Southwark and Wandsworth and all key stakeholders.

18. Maintain and develop Lambeth's strength in arts and culture and the role of the South Bank as one of London's leading international cultural and tourist destinations reflecting its status as part of the South Bank/Bankside Strategic Cultural Area.

**Figure 1.1. Lambeth Local Development Framework**



## **1.5 Compliance with the SEA Directive/Regulations**

The Sustainability Appraisal has been carried out in conformity with SA guidance (mainly the ODPM guidance on Sustainability Appraisal)<sup>1</sup> and meets the requirements of the Planning and Compulsory Purchase Act 2004 and the SEA Regulations (Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004). This SA report includes the required elements of an environmental report as required by the SEA Regulations. Table 1.1 signposts the relevant sections of the SA report that represent the required contents of the environmental report.

**Table 1.1: The Environmental Report requirements**

<b>SEA regulations requirement for an environmental report</b>	<b>Where covered in SA report</b>
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole report does this.
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Sections 1 and 3 and Appendix 1
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 3 and Appendix 2
The environmental characteristics of areas likely to be significantly affected.	Section 3 and Appendix 2
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 3
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those	Section 3 and Appendix 2

<sup>1</sup> ODPM (2005): Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents.

<b>SEA regulations requirement for an environmental report</b>	<b>Where covered in SA report</b>
objectives and any environmental considerations have been taken into account during its preparation.	
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Sections 4 and 5
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 5
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Sections 4
A description of measures envisaged concerning monitoring in accordance with Article 10.	Section 6
A non-technical summary of the information provided under the above headings.	See NTS embedded in this report
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	The whole report does this.
Consultation  Authorities with environmental responsibility and the public shall be given an early and effective opportunity	Appendix 5. The public and environmental authorities were given 6 weeks to comment on both the draft

<b>SEA regulations requirement for an environmental report</b>	<b>Where covered in SA report</b>
within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).	SA Report and the Preferred Option Core Strategy document as a best practice measure.

## 1.6 Links with other appraisals

### Habitats Regulations Assessment

The Core Strategy policies have also been screened for their impact on the integrity of European sites<sup>2</sup> as required under Articles 6(3) and 6(4) of the Habitats Directive<sup>3</sup>. The Habitats Regulations Assessment Screening Report is presented as a separate document and is available on the Council's website ([www.lambeth.gov.uk](http://www.lambeth.gov.uk)).

### Equalities Impact Assessment

The Sustainability Appraisal includes an assessment of the impact of the strategy on equalities groups through SA Objective 5. However, it is recognised that a more detailed assessment is required and a full Equalities Impact Assessment of the Core Strategy has been undertaken by Lambeth Council. An Equalities Impact Assessment Report has been prepared and will be published alongside the Submission Version Core Strategy.

## 1.9 Structure of this Report

This section provides an introduction to the plan and related SA process. The rest of this report is structured as follows:

**Section 2** outlines the methodology used in the Sustainability Appraisal

**Section 3** presents the main sustainability problems and opportunities identified and the SA Framework of sustainability objectives. It also discusses the evolution of the baseline without the plan. This section refers to the plan's relationship with other plans, programmes and environmental / sustainability objectives and the

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<sup>2</sup> European sites are Special Areas of Conservation designated under the Habitats Directive, Special Protection Areas designated under the Conservation of Wild Birds Directive, and Ramsar sites, wetlands of international importance designated under the Ramsar Convention.

<sup>3</sup> Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora.

baseline environmental and sustainability conditions within Lambeth which are presented within the Final Scoping Report in Appendix A.

**Section 4** presents the results of the appraisal of issues and options.

**Section 5** sets out the results of the appraisal of the final policies included in the Submission Core Strategy.

**Section 6** outlines initial proposals for monitoring the sustainability effects of the Strategy.

## 2. Appraisal Methodology

### 2.1 The SA Process

Sustainability Appraisal is being carried out as an integral part of the LDF Core Strategy preparation and has a number of iterative stages. These are shown in Table 2.1 below.

**Table 2.1: SA Stages**

SA Stage	Purpose of the SA Stage
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>	
A1: Identifying other relevant policies, plans and programmes and sustainability objectives	To document how the plan is affected by outside factors and suggest ideas for how any constraints can be addressed
A2: Collecting baseline information	To provide an evidence base for sustainability issues, effects prediction and monitoring
A3: Identifying sustainability issues and problems	To help focus the SA and streamline the subsequent stages, including baseline information analysis, setting of the SA Framework, prediction of effects and monitoring
A4: Developing the SA framework	To provide a means by which the sustainability of the plan can be appraised
A5: Producing scoping report and consulting on the scope of the SA	To consult with statutory bodies with social, environmental, or economic responsibilities to ensure the appraisal covers the key sustainability issues
<b>Stage B: Developing and refining options and assessing effects</b>	
B1: Testing the DPD objectives against the SA framework	To ensure that the overall objectives of the DPD are in accordance with sustainability principles and provide a suitable framework for developing options

<b>SA Stage</b>	<b>Purpose of the SA Stage</b>
B2: Developing the DPD options	To assist in the development and refinement of the options, by identifying potential sustainability effects of options
B3 and B4: Predicting and evaluating the effects of the DPD	To predict the significant effects of the DPD and assist in the refinement of the DPD
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	To ensure that all potential mitigation measures and measures for maximising beneficial effects are considered and as a result residual effects are identified
B6: Proposing measures to monitor the significant effects of implementing the DPD	To detail the means by which the sustainability performance of the DPD can be assessed
<b>Stage C: Preparing the Sustainability Appraisal Report</b>	
C1: Preparing the SA report	To provide a detailed account of the SA process (in a format suitable for public consultation and decision makers), including the findings of the appraisal and how it influenced the development of the DPD
<b>Stage D: Consulting on the draft Core Strategy and SA report</b>	
D1: Public participation on the draft Core Strategy of the DPD and the SA report	To provide the public and statutory bodies with an effective opportunity to express their opinion on the SA report and to use it as a reference point when commenting on the DPD.
D2 (i) Appraising significant changes	To undertake further appraisal, if required, where significant changes have been made since Preferred Options. This may take the form of an annex to the existing SA, or a revised SA.
D2 (ii) Appraising significant changes resulting from representations	To undertake any further appraisal on significant changes suggested by the Inspector following Examination.

<b>SA Stage</b>	<b>Purpose of the SA Stage</b>
D3 Making decisions and providing information	The Local Planning Authority must produce an SA adoption statement to accompany the adopted DPD outlining how they have taken the findings of the full SA process into account.
<b>Appraisal stage E: Monitoring the significant effects of implementing the Core Strategy</b>	
E1 Finalising aims and methods for monitoring	The measures envisaged for monitoring the DPD should be set out in the SA report and these should be finalised once the DPD is adopted.
E2 Responding to adverse effects	The SEA Directive specifically requires monitoring to identify, amongst other things, unforeseen adverse effects arising from the plan to enable remedial action to be taken.

The scoping phase of the SA (Stage A) resulted in the production of a SA framework which has been used to test the various stages of the plan. This is shown in Table 3.2 in Section 3.

## 2.2 The testing process

Testing the objectives, alternatives and draft policies is a central part of the appraisal process. This involved assessing the impact of the objective, option or policy against each of the sustainability objectives. This was done using a formal matrix. The impact of the option or policy on the SA objective was scored as follows: Major positive ✓✓; positive ✓; major negative XX; negative X; uncertain ?; or neutral O. In testing the plan objectives we used the same symbols, except that no double tick or cross was used because this test was intended to test consistency and conflict between the plan objectives and the SA objectives rather than to assess the significance of potential effects. The testing process assessed the impact in the short, medium and long term, and included a commentary on the reasons for making the judgement. An example of part of a testing matrix is shown in the box below.

**Table 2.2 Testing matrix example**

<b>Example of testing matrix</b>
<b>Policy S4 – Economic Development</b>

The Council will support local economic development, Lambeth's contribution to the central London economy and a range of local business and job opportunities, by giving priority to a diverse range of economically beneficial uses in appropriate locations. The Council will achieve this by:

- (a) Safeguarding Key Industrial and Business Areas (KIBAs) for business, industrial, storage and waste uses and other compatible commercial uses.
- (b) Maintaining a stock of other sites and premises (not in KIBAs) in commercial use across the borough to meet demand for premises from small businesses, creative industries, social enterprises and the voluntary sector. Where appropriate, this can include mixed use development or work-live units to increase the commercial viability of a scheme, subject to retaining the same quantity of commercial floor-space or making available in perpetuity a proportion of business units at affordable levels (less than local market levels).

Etc.

	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>SOCIAL</b>				
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	✓	✓	✓	The policy supports this SA Objective through making improvements to and maintenance of community safety, which is a particular priority with regards to the regeneration of Lambeth's town centres.

The SEA Directive requires the appraisal to identify significant impacts. In our appraisal, major positive, positive, major negative and negative impacts are all defined as "significant". Significance is assessed in terms of the **size** of the impact (e.g. whether a development will use a large or small amount of greenfield space) and the **importance** (e.g. will it take place on an important biodiversity site). The third factor is the **cumulative** effect of a number of small impacts, which when taken together can produce a significant impact (e.g. the effect on landscape of a number of small developments in the countryside).

The assessment was based on expert opinion of the consultants, supplemented by information from planners, drawing on the baseline data and analysis of key sustainability issues, and relevant research where available. The reason for undertaking this mainly qualitative approach (i.e. based on opinions rather than data) was the lack of existing research to quantify the likely effects of the plan, and the costs and practical difficulties in undertaking any new research in the timescale required. The uncertainties inherent in appraising a strategic plan of this nature mean that it is in fact impossible to quantify the majority of the potential impacts.

In the testing matrices, the conclusions, concentrating on the significant impacts are summarised at the bottom, along with recommendations for changes to mitigate negative impacts of the policies. In some cases this involves

recommendations for issues that need to be addressed in other DPDs or development consents. Any uncertainties or assumptions that have been identified through undertaking the appraisal are also summarised. In all cases, unless otherwise stated, the effects identified are direct and permanent.

## **2.3 Testing SA objectives and Plan objectives**

Guidance<sup>4</sup> states that it is important for the objectives of the DPD to be in accordance with sustainability principles. The Core Strategy objectives have therefore been tested for compatibility with the SA objectives: see the table below (symbols are the same as for the main appraisal).

This table shows that there is a high degree of compatibility between Core Strategy objectives and sustainability objectives. The only possible areas of incompatibility concern the location of new waste management facilities and their impact on housing and the local economy. Given the highly urban residential nature of the borough, it will be a challenge to locate new facilities in places that do not impact on residential areas. In addition, given the competition for land, allocating land for waste management facilities could compete with the need for housing land and land for economic development (jobs).

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<sup>4</sup> DCLG 2005

**Table 2.3 SA objectives and Strategy objectives compatibility matrix**

SA objectives →	DPD objectives ↓	1. Safety	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Livability	8. Built Heritage	9. Travel	10. Biodiversity	11. C.Change	12. Water	13. Waste	14. Air quality	15. Ed & Skills	16. Local economy	17. Regeneration	18. Worklessness
1. Housing	✓	✓	?	✓	✓	✓	✓	✓	✓	?	?	?	✓	✓	✓	✓	✓	✓	✓
2. Economy	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	?	?	?	✓	✓	✓	✓	✓	✓
3. Jobs	✓	✓✓	✓	✓	✓✓	✓	✓	✓	✓	0	?	?	?	✓	✓	✓	✓	✓	✓
4. CC Mitigation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓✓	✓	✓	0?	✓✓	✓	?	?	?	?
5.Biodiversity	0	✓	✓	✓	0	✓	0	✓	✓	✓✓	✓	✓	0	✓	0	0	0	?	0
6. CC Adaptation	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	✓	0	✓✓	✓	?	0	0	✓	0
7.Infrastructure	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	✓	✓	✓
8.Transport	✓	✓	✓	✓	✓	✓	0	✓	0	✓✓	✓	✓	0	0	✓✓	0	?	?	?
9.Schools	0	✓	✓	✓✓	✓	✓	?	✓	0	✓	0	✓	0	0	✓✓	✓	✓	✓	✓
10.Health	✓	✓✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	✓	?	✓	?	✓
11.Open Space	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	0	✓
12.Waste	0	?	✓	✓	0	x?	?	?	?	✓?	?	?	?	✓✓	?	0	✓/x?	?	✓

13.Cohesion	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	?	✓	✓	?	0	0	✓	✓	✓	✓
14.Safety	✓✓	✓	0	?	✓	✓	✓	✓	✓	0	0	0	0	0	0	?	0	?	?
15.Public Realm	✓	?	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	0	✓	?	✓	0	0	0	0	0	✓
16.Built Heritage	0	0	0	0	0	?	✓✓	✓✓	0	0	0	0	0	0	0	0	0	0	0
17.Opp Areas	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	?	?	✓	✓✓	✓✓	✓✓
18.Arts/ Culture	0	0	✓	✓	0	✓	✓	✓	✓	?	0	0	0	?	0	✓	✓	✓	✓

## **2.4 Testing cumulative impacts**

Part of the testing process also involves consideration of secondary, cumulative and synergistic effects. Secondary effects are indirect effects, for example health impacts of air pollution from transport. Cumulative impacts, mentioned above in relation to individual policies, also apply to the accumulation of the effects of all the policies in the plan. Synergistic effects are those which interact to produce a total effect greater than the sum of the individual effects, for example progressive fragmentation of a wildlife habitat leading to areas too small to support wildlife.

In the appraisal, secondary, synergistic and cumulative effects of individual policies were considered in the testing process where relevant. Potential cumulative effects have been summarised separately in Section 5.

## **2.5 Difficulties encountered in compiling information or carrying out the appraisal**

Uncertainties have been identified in the appraisal of the Core Strategy. When appraising the policies of the Core Strategy some of these uncertainties have related to policies that will be implemented through other DPDs which will be adopted after the Core Strategy. The effect of these policies on some of the SA Objectives have been recorded as uncertain because it is difficult to make assumptions about the effects of a plan that has yet to be written. In these cases, recommendations have been made for the lower tier DPDs as appropriate.

Where difficulties have been encountered in the collection of baseline data, these have been recorded as data gaps and can be found in Appendix 2.

## **2.6 Consultation**

In order to meet the requirements of the SEA Directive, the Planning Authority must seek the views of designated environmental consultation bodies on the scope of the appraisal and on the draft report. It must also consult with the public on the draft report. The table below shows the consultation process to date.

<b>Stage of Appraisal</b>	<b>Date</b>	<b>Consultation methods</b>
Draft Scoping report: tasks A1-A4	November and December	As required by the Strategic Environmental Assessment (SEA) Directive (Article 6(2)), the Scoping Report was referred to the Consultation

	2008	Bodies with environmental responsibilities namely, Natural England, English Heritage, and the Environment Agency. The Report was also issued for consultation to other statutory consultees and key stakeholders. In addition, the report was published on the Council's website and copies were available at the Lambeth Town Planning Advice Centre, and at all public libraries in Lambeth.
Draft SA Report (including appraisal of draft policies)	April and May 2009	The draft SA Report was published for consultation alongside the draft Core Strategy. Comments were invited from the public, stakeholders and statutory consultees.

Appendix 5 sets out the consultation audit.

A document called a SA adoption statement must be produced when the plan is adopted. This SA adoption statement will include details of what consultation has been carried out on the SA and the plan and how all comments received have been taken into account.

# **3. Sustainability objectives, baseline and context**

## **3.1 Introduction**

This section presents information that was presented in the Scoping Report and has subsequently been updated in response to the comments received during consultation on the report. Additional information is presented within Appendices 1 and 2.

## **3.2 Review of Plans, Programmes, Policies and Sustainability Objectives relevant to London Borough of Lambeth**

What the SEA Regulations say...

*Information for Environmental Reports...*

- 1. An outline of the plan's relationship with other relevant plans and programmes; and*
- 5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation. (N.B. ODPM guidance (2005) extends this to include other sustainability objectives).*

The Context review is Stage A1 of the process outlined in the ODPM's Guidance on Sustainability Appraisal. The Guidance explains that a plan may be influenced in various ways by other plans or programmes and sustainability objectives, such as those laid down in policies or legislation. These relationships should be explored to:

- identify any external social, environmental or economic objectives that should be reflected in the SA process;
- identify external factors, such as sustainability issues, that might influence the preparation of the plan; and
- determine whether the policies in other plans and programmes might lead to cumulative effects when combined with policies in the plan that is subject to the SA.

The Context review meets the requirements of the SEA Directive to provide an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.

Relevant documents at international, national, regional and local level have been reviewed. For each document the following information has been collated:

- key objectives relevant to the LDDs and SA;
- key targets and indicators relevant to the LDDs and SA;
- implications for the LDDs; and
- implications for SA.

This information has been used to inform the subsequent stages of the process, which are covered in later sections of this document.

- identification of sustainability issues (stage A3);
- development of SA framework (stage A4); and
- baseline review (stage A2).

The full review is included as Appendix 1 to this report. The review has been updated since the publication of the Scoping Report, to include policies, plans and programmes issued in the interim and those suggested by consultees.

### 3.3 Baseline data review

What the SEA Regulations say...

*Information for Environmental Reports...*

2. *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.*
3. *The environmental characteristics of those areas likely to be significantly affected*
4. *Any existing problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and Habitats Directive.*

The baseline review describes the current social, economic and environmental conditions in the Borough. The Guidance notes that baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems. Collecting baseline information therefore contributes to the effectiveness of the appraisal. The aim is to collect information relating to each of the sustainability objectives. However, in reality there will be gaps in data availability. The Guidance notes that where there are gaps, it is important to record any resulting uncertainties or risks in the appraisal. Provisions should also be made to fill any major gaps for future programmes or reviews.

The baseline review meets the requirements of the SEA Directive to provide information on *the environmental characteristics of the area likely to be affected*.

The Baseline review for London Borough of Lambeth is included in Appendix 2. The SEA Directive requires difficulties in collecting data and limitations of the data to be presented. In practice, the difficulties in collecting data are usually associated with certain data not being available and/or assumptions being made about data. Data gaps and assumptions have therefore been identified for each topic presented within Appendix 2.

It should be noted that the baseline review is based on existing evidence, including that gathered specifically for the Borough's LDF documents. This evidence base can be viewed via the following link:

<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/LocalDevelopmentFramework%28LDF%29evidencedocuments.htm>

The Council is undertaking further evidence gathering and it is intended that this will feed into the baseline when the Scoping Report is reviewed. Studies currently underway include:

- House Conversions Study;
- Affordable Housing Policy Viability Study;
- GLA Housing Capacity and Strategic Housing Land Availability Assessment; and
- Strategic Housing Market Assessment.

### **3.4 Likely evolution of the baseline without the Core Strategy**

Trends data collected in order to understand the baseline characteristics of Lambeth Borough (presented in Appendix 2) can also be used to understand how the baseline is likely to evolve without the Core Strategy in place. Key aspects of this information are presented below:

- Carbon emissions are on the increase and could be exacerbated by proposed levels of growth in the London Plan if not managed in an appropriate way. Climate change could have severe ramifications for London and Lambeth's populations, economy, wildlife, cultural heritage and material assets.
- Increasing population and increased economic activity are placing increasing demand on water supply, biodiversity and open space.
- The majority of waste from London is still being landfilled. London's use of incineration with energy recovery has remained stable with an average of 19%. This figure is higher than UK average of 9% over the same period. The amount

of waste being recycled or composted is increasing. However, London's recycling performance was the lowest in the English regions in 2005/06. The statutory target for recycling in the Lambeth Borough was 14% in 2003/04 which was met. The target for 2007/08 has been set at 21%. Efficient management of waste is needed including increasing recycling rates and self-sufficiency in waste disposal within the Borough. The Borough needs to provide sufficient waste management facilities i.e. land to meet Mayor's waste apportionment for Lambeth otherwise these targets cannot be met.

- Trends during the last 11 years show reductions in concentrations of many air pollutants, apart from ozone (which is a long distance pollutant and is affected by levels in Europe). Although recent trends in air quality show that concentrations of key pollutants have reduced in the last 10 years, it is important to recognise that air quality in London continues to breach the European Union and national health-based targets and to affect Londoner's health and quality of life.
- There is an increasing demand for use of energy arising from population growth and increased economic activity. Intervention is needed to make more efficient use of energy including placing requirements on new developments and finding ways to improve the efficiency of existing buildings. There is a need to increase the proportion of energy from renewable sources and achieving this through new development is a major opportunity. 26% of residents live in fuel poverty.
- 19 listed buildings in the borough are on the 'at Risk' Register in 2007-8. This number is going down however, intervention is needed to save these properties from irredeemable loss.
- There is an increasing demand for housing and especially affordable and sustainable housing within the borough. There are a high proportion of apartments within Lambeth. Different types and sizes of housing are needed and intervention would be required in order to deliver this.
- The delivery of essential infrastructure needed to support population growth is needed. The delivery of infrastructure needs to keep pace with development and population growth, otherwise there could be a shortfall in provision of infrastructure such as sewage, water supply, social facilities such as schools and doctors surgeries and green infrastructure such as parks and nature areas. There is an expected demand for an additional 5460 primary school places by 2020 and an additional 2294 secondary school places by 2015. The amount of open space per person is expected to decrease with population growth and expected new development (and a lack of opportunity for the creation of major open space)
- There are worsening trends of social inequalities within the borough.
- The borough experiences high levels of crime and perception of crime, and there is a continuing threat of terrorism. There is a continuous need to make the borough safe for both visitors and residents.
- The number of walking trips made in London has declined by 13 percent in the past decade. Research shows there are many factors that discourage people from walking. These include concerns about traffic volume, air quality, road safety, personal security, lack of information and the poor quality of the street environment. Walking is rejected as a mode of transport because London's streets are seen as unattractive, dirty, cluttered, inconvenient, badly

maintained, poorly lit and difficult to cross. In addition, people with disabilities often find their needs have not been considered.

- Half of all journeys made in London are under two miles, a distance easily cycled. However, the level of cycling in London is relatively low compared to many other European cities. Road traffic is the primary cause of air pollution in Lambeth, as it is in the rest of London. There is a need to increase public transport accessibility and promote walking and cycling.
- There is an ongoing pressure to move around London and potential adverse impacts in the form of congestion and increased pressure on public transport systems. There is a need to increase public transport accessibility and promote walking and cycling. Intervention is needed in planning developments, new community facilities and regeneration to provide good access by foot, cycle and public transport.
- Health inequalities exist within the Borough. Lambeth has a much higher prevalence of mental health needs than other comparative boroughs of London. Health outcomes that relate to deprivation are relatively poor in Lambeth: life expectancy, infant mortality and premature deaths from cardio vascular diseases and cancer. However, these outcomes have been improving in recent years, despite the worsening relative deprivation of the Borough. Health inequalities will continue to exist without intervention and the improvement of people's quality of life.
- High rates of child poverty continue as do the relative impacts on the capacity of Londoners to engage economically and socially. Lambeth also has a steadily growing and highly mobile population, and a high proportion of working age people, who all need to be accommodated within the workforce. It also suffers from high levels of need, with higher than average proportions of lone parents and Black and Minority Ethnic (BAME) groups who have lower than average employment rates. Other factors within the London labour market include a high level of competition for jobs, putting young people, the lower-skilled and parents at an increasing disadvantage. There are also particular problems in London accessing affordable childcare. There is a need to ensure the provision of jobs for local people, especially those in BAME groups.

### **3.5 The main social, environmental and economic issues and problems identified**

The Guidance comments that *the identification of sustainability problems is an opportunity to define key issues for the DPD and develop sustainable plan objectives and options.*

The identification of sustainability issues also provides useful information for the Sustainability Appraisal process itself. It informed Stage B of the process where options and policies were tested against the appraisal objectives. For example when testing options for development, information that *half of Lambeth's households do not have access to a car* is a sustainability issue that informed the judgements made in the testing process and influenced the choice of options.

The identification of sustainability issues meets the requirements of the SEA Directive to identify *any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance.*

A list of issues was developed from the review of plans, programmes and policies and the baseline data collected. This is shown in the table below.

**Table 3.1 Key Sustainability Issues**

Lambeth key issue	London key issue	KEY ISSUES TO BE ADDRESSED BY THE PLAN
<b>Increase the overall supply and mix of housing</b> , including affordable housing. Capacity for conversions.	<b>Housing</b> : the need for affordable and sustainable housing and different types of dwelling, spiralling housing costs and increased demand.	Access to good housing. Affordable housing. Sustainable housing. Housing mix and types.
<b>Provide the essential infrastructure</b> to support population growth.		Infrastructure provision, including healthcare services and facilities; and schools
<b>Develop mixed, cohesive, safe communities</b> accessible to all.	<b>Equality and diversity</b> : meeting the needs of a growing population with a changing demography, greater diversity and worsening trends of social inequalities.  <b>Safety and security</b> : high levels of crime and perception of crime, the continuing threat of terrorism and the need to make London safe for both visitors and residents.	Mixed communities. Cohesive communities. Safe communities. Accessible communities. Meeting the needs of diverse communities. Addressing social inequities. Tackling crime. Tackling terrorism. Addressing fear of crime.
<b>Provide good access to local services</b> and community facilities within neighbourhoods.	<b>Accessibility/availability</b> : ongoing pressure to move around London and potential adverse impacts in the form of congestion, increased pressure on public transport systems and so on.	Good local access to services and facilities. Tackling congestion.
<b>Increase the number and variety of jobs in the local economy</b> , including local jobs for local people.	<b>Stable economy</b> : continued high rates of child poverty and the relative impacts on the capacity of Londoners to engage economically and socially.  <b>Employment</b> : high levels of unemployment, particularly	Increasing jobs, particularly local jobs for local people. Addressing high rates of child poverty. Addressing worklessness and unemployment among Black, Asian, Ethnic

<b>Lambeth key issue</b>	<b>London key issue</b>	<b>KEY ISSUES TO BE ADDRESSED BY THE PLAN</b>
	among Black, Asian, Ethnic and Minority groups, the removal of barriers to employment, and the key role played by London's economy within the whole UK economy.	and Minority groups. Tackling barriers to employment. London's role in the UK economy.
<b>Support the growth of key economic sectors</b> through new business development, business retention and inward investment.		New business development. Business retention. Inward investment. Targeting key economic sectors.
<b>Create viable, safe and well managed town centres.</b>		Viable, safe and well managed town centres.
Support the regeneration and renewal of <b>London Plan Opportunity Areas</b> .	<b>Regeneration and land use:</b> regeneration in the Waterloo and Vauxhall Opportunity areas is expected to maximise densities, taking account of local residential amenity and other needs.	Regeneration of London Plan Opportunity Areas. 2012 Legacy.
<b>Reduce carbon emissions</b> from residents, businesses, public services and buildings.  Implement measures to help Lambeth <b>adapt to the consequences of inevitable climate change</b> , including flood risk management	<b>Climate change:</b> carbon dioxide emissions are on the increase and could be exacerbated by the proposed level of growth if not managed in an appropriate way. Climate change could have severe ramifications for London's population, economy, wildlife, cultural heritage, and material assets.	Reducing CO2 emissions.  Climate change adaptation, including flood risk management
<b>Increase public transport accessibility and promote walking and cycling.</b>		Increase public transport, cycling and walking.
Maximise the <b>efficient use and management of resources</b> , including water, energy and waste.	<b>Natural resources:</b> increasing demand for water, use of energy, pressure on biodiversity and open space arising from population growth and increased economic activity.  <b>Waste:</b> significant challenges to raise the level of recycling and self-sufficiency for waste disposal from the very low base in 2000. The challenge of maintaining a vibrant retail sector, whilst ensuring that the ethos of sustainable	Efficient use and management of resources.  Efficient use and management of water: addressing increasing demand.  Efficient use and management of energy.  Efficient management of waste: increasing recycling rates and self sufficiency in waste disposal.

Lambeth key issue	London key issue	KEY ISSUES TO BE ADDRESSED BY THE PLAN
	consumption is adhered to, including providing for new directives on waste disposal.	Pressure on biodiversity and open spaces.
	<b>Air quality:</b> London still suffers from some of the worst air quality in the UK and is in breach of two EU targets.  <b>Health and well-being:</b> poor health outcomes and a widening disparity of relative wellbeing across London boroughs (across a range of health issues), high rates of child poverty and the relative impacts on the capacity of Londoners to engage economically and socially.	Improving air quality (and meeting EU targets). Addressing health inequalities.

### 3.6 The SA framework, including objectives, targets and indicators

Sustainability Appraisal is an objective-led process. This means that the potential impacts of a plan are tested against a series of objectives for sustainable development (e.g. an objective might be *to use resources efficiently*).

Along with any associated indicators and targets, the objectives form the SA Framework. The Guidance notes that particularly relevant sources for SA objectives include the UK Sustainable Development Strategy, the Regional Sustainable Development Frameworks, and at the local level, Community Strategies or Plans. Baseline information collected and sustainability issues identified at earlier stages in the SA can also be especially useful in identifying objectives and targets.

It should be noted that the SA objectives are distinct from the LDF objectives though they may in some cases overlap with them.

A set of objectives and sub-objectives was produced, based on the following sources:

- objectives used in the Sustainability Appraisal of the London Plan<sup>5</sup>;
- priorities defined in the London Borough of Lambeth Sustainable Community Strategy (2008-2020);

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<sup>5</sup> *Sustainability Appraisal to the Draft Further Alterations to the London Plan (September 2006)*

- information on issues and objectives from the context review and the baseline data; and
- the objectives have been cross-checked against the priorities in the UK Government Sustainable Development Strategy.<sup>6</sup>

The SA framework is shown in the table below. Targets were identified in the Scoping Report and can be found in the proposed monitoring programme presented in Section 7 linked to sustainability issues. The SA framework was presented in the Scoping Report and has been updated in response to consultation comments received. As a result, the SA Framework presented below is slightly different to that presented in the Scoping Report. This SA Framework has been used to test the issues and options, draft and Submission Core Strategy policies.

**Table 3.2 The SA Framework**

SA Objective	Appraisal prompt questions and targets
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• reduce the opportunities to commit crime and engage in antisocial behaviour?</li> <li>• help address the fear of crime as well as crime itself?</li> <li>• create the conditions for communities to develop which will support a reduction in crime and the fear of crime?</li> <li>• reduce Lambeth's vulnerability to major challenges such as climate change and water shortages?</li> <li>• reduce Lambeth's vulnerability to terrorist action?</li> <li>• reduce the need for motorised travel?</li> <li>• encourage walking and cycling, for instance by reducing traffic accidents to pedestrians and cyclists?</li> </ul>
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• protect health and wellbeing?</li> <li>• reduce poverty, including child poverty?</li> <li>• reduce health inequalities?</li> <li>• improve mental, emotional and physical health, and wellbeing?</li> <li>• encourage the development of healthy neighbourhoods?</li> <li>• make walking and cycling more attractive relative to other alternatives?</li> <li>• improve access to health care services?</li> </ul>
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel? Including: <ul style="list-style-type: none"> <li>◦ Schools</li> <li>◦ Nurseries</li> <li>◦ GPs and hospitals</li> <li>◦ Libraries</li> <li>◦ Places of worship</li> </ul> </li> </ul>

<sup>6</sup> Securing the Future March 2005

	<ul style="list-style-type: none"> <li>○ Food shops (especially those selling fresh, healthy food)</li> <li>○ Community centres</li> <li>○ Children's play areas</li> <li>○ Sports and recreation facilities</li> <li>○ Open spaces and wildlife habitats</li> <li>○ Police and emergency services</li> <li>○ Banking facilities and post offices</li> </ul>
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• Ensure that appropriate infrastructure keeps pace with population growth, in particular: <ul style="list-style-type: none"> <li>○ water and sewerage infrastructure</li> <li>○ health 'infrastructure' (facilities and services)</li> <li>○ schools</li> <li>○ green infrastructure</li> <li>○ transport.</li> </ul> </li> </ul>
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• promote equity, or fairness between population groups?</li> <li>• improve environmental conditions for Lambeth's deprived areas and deprived communities?</li> <li>• reduce poverty and social exclusion?</li> <li>• promote social cohesion within and between population groups?</li> <li>• enable social integration between minority groups and wider society?</li> <li>• ensure equitable outcomes for Lambeth's main 'equalities groups': race, gender, disability, sexual orientation, age and faith?</li> </ul>
6. Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	<p>Will the Strategy:</p> <ul style="list-style-type: none"> <li>• increase access to good housing?</li> <li>• meet affordable housing targets?</li> <li>• meet sustainable housing standards?</li> <li>• increase the mix and type of housing, including family units?.</li> <li>• reduce actual noise levels and disturbances from noise?</li> <li>• tackle homelessness?</li> </ul>
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• enhance the quality and quantity of open space and the public realm?</li> <li>• reduce the proportion of the public realm where noise precludes conversation or where other environmental factors (e.g. fumes) make it unpleasant to be?</li> <li>• promote community engagement?</li> <li>• promote interactions between different sectors of the community?</li> <li>• promote good governance?</li> <li>• promote wellbeing and help to make people feel positive about the area where they live?</li> <li>• promote child-friendly buildings?</li> <li>• promote Lambeth as a place that people want to put down roots rather than just pass through?</li> </ul>
<b>ENVIRONMENTAL</b>	
8. Built and historic environment. Improve	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• protect sites, features and areas of historical,</li> </ul>

<p>the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.</p>	<ul style="list-style-type: none"> <li>• archaeological and cultural value/potential?</li> <li>• enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals)?</li> <li>• aspire to a range of buildings and architecture that reflect the cultural diversity of the borough?</li> <li>• conserve and enhance the townscape/cityscape character, including historical, archaeological and cultural value/potential and its contribution to local distinctiveness?</li> <li>• increase access to, enjoyment of and understanding of, historical, archaeological and cultural sites, features and areas?</li> <li>• protect, enhance or create open space?</li> <li>• protect valued views?</li> </ul>
<p>9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.</p>	<p>Will the Strategy:</p> <ul style="list-style-type: none"> <li>• reduce travel?</li> <li>• encourage a shift to more sustainable forms of travel: walking, cycling and public transport?</li> <li>• encourage greater efficiency in the transport network, such as through higher load factors?</li> <li>• integrate new development, especially residential development, with sustainable transport choices?</li> </ul>
<p>10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.</p>	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• conserve and enhance habitats and provide for the long-term management of natural habitats and wildlife?</li> <li>• protect and enhance access to open space and improve the quality of publicly accessible green space?</li> <li>• increase and enhance the resilience of Lambeth's key priority habitats and species in line with its Biodiversity Action Plan's long term vision and objectives?</li> <li>• encourage replacement of valuable lost habitat?</li> <li>• bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens?</li> </ul>
<p>11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.</p>	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>• reduce emissions of greenhouse gases by reducing energy consumption?</li> <li>• increase the proportion of energy both produced and used from renewable and sustainable resources?</li> <li>• reduce the impacts of climate change? e.g. urban heat island effect, flooding and drought?</li> <li>• ensure adaptation to the future impacts of climate change?</li> <li>• ensure that new and retrofitted development and infrastructure is located, designed and constructed to withstand the effects of climate change over its design life?</li> <li>• promote high quality, appropriate design and sustainable construction methods in all types of building, including new build and retrofit?</li> <li>• promote the highest standards of energy and</li> </ul>

	<p>environmental performance for new and existing buildings?</p> <ul style="list-style-type: none"> <li>minimise embedded carbon in new buildings and development?</li> </ul>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>improve the quality of water and waterbodies (surface and groundwater)?</li> <li>reduce piped water consumption e.g. through reducing demand and encouraging recycling in households?</li> <li>reduce waste water and sewage needing processing?</li> <li>support sustainable urban drainage?</li> <li>minimise the risk of all types of flooding (tidal, fluvial, surface water and sewerage) to people and property and manage flood risks appropriately both now and in the long-term?</li> </ul>
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>minimise the production of waste, maximise recycling and reuse during construction, and decrease the demand for raw materials from unsustainable sources e.g. through reusing demolition material onsite and using products made from recycled materials?</li> <li>make waste avoidance, reuse and recycling easy for residents and visitors?</li> <li>help develop markets for recycled products by using them?</li> <li>enable safe storage of waste and recycling, convenient for both residents and collectors?</li> <li>make appropriate provision for waste management facilities in the Borough to help meet the London Plan apportionment and self sufficiency targets?</li> </ul>
14. Air quality. To improve air quality.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>reduce emissions of PM10, NO2 and ozone depleting substances?</li> <li>help to achieve national and international standards for air quality (e.g. those set out in the Air Quality regulations 2000 and (Amendment) Regulations 2002 as well as local air quality management targets?)</li> <li>support the planting of trees?</li> <li>promote the 'transport hierarchy'?</li> </ul>
<b>ECONOMIC</b>	
15. Education and skills. To maximise the education and skills levels of the population.	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages?</li> <li>contribute to up-skilling and to meeting skills shortages?</li> <li>promote healthy, sustainable living?</li> </ul>
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of	<p>Will the strategy:</p> <ul style="list-style-type: none"> <li>improve the resilience of business and the economy e.g. through supporting indigenous and local business, diversification, corporate social responsibility, accommodating low income workers, supporting and driving the marketplace?</li> <li>support employment opportunities in the most deprived areas and groups and stimulate</li> </ul>

businesses.	<p>regeneration?</p> <ul style="list-style-type: none"> <li>• enable people to live better for a given income by reducing their need for paid goods and services?</li> <li>• contribute to sustainable tourism?</li> </ul>
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	<p>Will the Strategy:</p> <ul style="list-style-type: none"> <li>• maximise regeneration benefits to the most deprived areas and communities?</li> <li>• promote the efficient, innovative and multifunctional use of land?</li> <li>• ensure the provision of adequate quantities and type of public realm?</li> <li>• protect the Borough's soil resource?</li> </ul>
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	<p>Will the Strategy:</p> <ul style="list-style-type: none"> <li>• improve accessibility to employment, especially for local people?</li> <li>• improve employment opportunities among Black, Asian, Ethnic and Minority groups?</li> <li>• protect local employment land and uses?</li> <li>• tackle the causes of worklessness such as provision of affordable childcare?</li> <li>• provide additional housing near places of work?</li> </ul>

# 4. Plan Issues and Options Appraisal

What the SEA Regulations say...

*Information for Environmental Reports...*

6. *The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage) and landscape (and the inter-relationship between the issues above).*

7. *The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.*

8. *An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information.*

## 4.1 The 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.

## **4.2 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.

### **4.2.1 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.

#### **4.2.2 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 CO<sub>2</sub> 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.

#### **4.2.3 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 1,100 additional homes in Lambeth each year until 2016/17;
- 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](http://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 current Lambeth Unitary Development Plan (for further information, see the Lambeth Annual Monitoring Report at [www.lambeth.gov.uk/planning](http://www.lambeth.gov.uk/planning)). 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).

# 5. Core Strategy Policies Appraisal

What the SEA Regulations say...

*Information for Environmental Reports...*

6. *The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage) and landscape (and the inter-relationship between the issues above).*
7. *The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.*
8. *An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information.*

## 5.1 How social, environmental and economic problems were considered in developing the policies

Following the appraisal of the issues and options the draft Core Strategy contained a sixth key overarching issue, regarding the provision of essential infrastructure. Therefore, to achieve sustainable development in Lambeth over the next 15-20 years, the Core Strategy must address six key overarching issues:

- Accommodating population growth;
- Achieving economic prosperity and opportunity for all;
- Tackling and adapting to climate change;
- Providing essential infrastructure;
- Promoting community cohesion and safe, liveable neighbourhoods; and
- Creating attractive, distinctive places.

Therefore, the Draft Core Strategy recognised that 'some areas of infrastructure provision are particularly critical to the success of the Strategy because they are already subject to considerable pressure for resources and/or there are specific strategic policy requirements to be met over the next 15 to 20 years. These

include public transport, school places, health services, open space and waste facilities. As a result, the Core Strategy identifies specific objectives and mechanisms for delivering these types of infrastructure in addition to the overall spatial approach’.

The Draft Core Strategy Vision was expanded with strengthened references to equality groups (young people, the elderly and people with disabilities), climate change (both mitigation and adaptation), public transport capacity, and delivery.

The revised strategic objectives increased from 12 to 18 reflecting many of the recommendations in the SA, in particular:

- Emphasising housing *quality*;
- Reducing greenhouse gas emissions from *transport*;
- Addressing public transport capacity;
- Reducing the need to travel, especially by private car;
- Addressing local biodiversity amenity;
- Promoting renewable energy generation, including on-site generation;
- Adapting to climate change, including flood issues; and
- Planning for sustainable waste management.

The Draft Core Strategy policies reflected a number of the issues identified in the SA. It included specific policies on a range of environmental sustainability issues (climate change/ energy, water/flooding, waste management, greening/ biodiversity) and a general policy on sustainable design and construction. These were all issues raised by the SA. In addition, there was a much stronger emphasis on infrastructure (including a policy), addressing social, physical and green infrastructure. Key social facilities and services needed for sustainable communities and neighbourhoods, such as access to health care, schools and open space/ high quality public realm, featured strongly. The issue of public transport capacity was also addressed, and there was a real emphasis on locating development on sites with good public transport accessibility.

Further changes were made to the Submission Draft as a result of the SA of the Preferred Options policies. These include the consideration of safeguarding existing heat, cooling and power networks, further policy support for the waste hierarchy and in particular the efficient use of resources, the reuse of materials and resources, and the recovery of energy from materials and further safeguarding and promoting improvements to the borough’s heritage assets.

## 5.2 Approach to appraising the submission draft policies

The Preferred Options policies presented within the Draft Core Strategy were appraised in January and February 2009 by consultants from CAG and ENVIRON. Some of these policies have changed in the Submission Draft Core Strategy. Some of the changes are minor and some are more significant. The **strategic policies** were streamlined down from thirteen to ten policies: former policies S2 (sustainable neighbourhoods) and S6 (social infrastructure) were removed, whilst policies on energy and sustainable design and construction were merged. Whilst the **Places and Neighbourhood policies** were broadly unchanged, a new policy PN10 'Local Centres' was added. All of the policies have been re-appraised in light of the changes made.

The policies in the Submission Draft Core Strategy are as follows.

Policy S1 – Delivering the vision and objectives	Policy PN1 Waterloo
Policy S2 - Housing	Policy PN2 Vauxhall
Policy S3 – Economic Development	Policy PN3 Brixton
Policy S4 – Transport	Policy PN4 Streatham
Policy S5 – Open Space	Policy PN5 Clapham
Policy S6 – Flood Risk	Policy PN6 Stockwell
Policy S7 Sustainable design and construction	Policy PN7 Oval
Policy S8 – Sustainable Waste Management	Policy PN8 West Norwood and Tulse Hill
Policy S9 – Quality of the Built Environment	Policy PN9 Herne Hill
Policy S10 – Planning Obligations	Policy PN10 Local Centres

A matrix based on the SA Framework of objectives was used to assess the social, environmental and economic effects of the draft policies. The matrices are presented within Appendix 3. A summary of the performance of the draft policies is presented below. The summaries of the results of the appraisals of policies presented below include uncertainties which limit the appraisal along with recommendations and mitigation.

## **5.3 Results of the appraisal of the Submission Draft policies**

Below we set out our findings and recommendations on the Submission Draft policies.

### **Vision and Strategic Objectives**

The vision and strategic objectives 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 to tackle climate change (mitigation and adaptation), address infrastructure issues, provide local jobs and services and promote sustainable modes of travel. The vision and strategic objectives have taken on board many of the issues highlighted previously by the SA.

**Uncertainties:** There remain uncertainties about the delivery of essential infrastructure required for growth, in particular:

- Timing: there is a danger that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front;
- Funding (and land required?) for some of the proposed infrastructure schemes has not been identified (e.g. some of the school place provision);
- The proportion of open space per resident ('green infrastructure') is likely to reduce as the population increases whilst new open space opportunities are extremely limited.

**Recommendations:** The strategic objectives and Core Strategy policy should also target the regeneration of London Plan Areas of Regeneration.

### **Policy S1 – Delivering the vision and objectives**

The policy concerns the delivery of the Strategy's vision and objectives, including the social, green and physical infrastructure required to accommodate the proposed growth. It targets key areas of the borough to deliver development and regeneration, which scores well over the range of social and economic objectives. Respecting local distinctiveness scores well on protection of the built heritage. There is no detail in the policy on the suite of environmental objectives (including climate change), sustainable design or sustainable transport. Environmental standards/ targets are set to be addressed in other DPDs.

However, there is an uncertainty regarding the delivery of much needed infrastructure, such as school places and health care provision, and what impact this might have on quality of life issues within the Borough.

**Uncertainties:** Delivery of infrastructure, in terms of funding and site allocations.

**Recommendations/Mitigation:** Greater specificity on infrastructure provision would be helpful in order to explain what improvements are necessary to enable the planned scale of growth to be delivered. Annex 2 could clarify whether these schemes are in providers' programmes and whether they are funded. There is then the issue of how much growth/development could occur if the uncommitted schemes did not come to fruition.

## Policy S2 – Housing

The previous SA recommendation to add the affordable housing breakdown of 70% social housing and 30% intermediate provision to the policy has been taken on board.

The policy sets out plans to deliver 7,700 net additional dwellings across the borough between 2010/11 and 2016/17 in line with London Plan targets, and a further 8,800 more homes by 2024/25. It is therefore difficult to differentiate between short, medium and long term as the benefits of housing provision and other benefits that will come with this, such as affordable housing provision and homes built to Lifetime Homes standards should be provided throughout this period of time.

The policy is considered to support the achievement of SA Objectives relating health and well being, equality and diversity, built and historic environment, local economy, and regeneration and efficient use of land. The policy does not refer to sustainable construction but Policy S7 Sustainable Design and Construction deals with some of these issues and the Development Management DPD will need to deal with these issues in detail.

**Uncertainties:** Although it is not recorded in the matrix, it should be noted that there could be some uncertainty relating to the delivery of housing by private house builders, due to the current market forces. However, this is beyond the control of the policy. It is assumed that Development Management policies and supporting SPD will address the potential impact of housing development.

**Recommendations:** Sustainable waste management in relation to new housing construction and operation will need to be dealt with within the Development Management DPD.

## Policy S3 – Economic Development

The policy lends support to existing businesses, regeneration and employment programmes and therefore effects identified in the matrix should apply over the short, medium and long term.

The policy performs well against the SA Framework, in particular with regard to objectives about tackling worklessness, regeneration and efficient use of land, local economy, education and skills, transport and travel, liveability and place and access and services. It also performs well in relation to air quality, waste, climate

change and energy, built and historic environment, equality and diversity, provision of essential infrastructure, health and well being, and crime and safety.

**Uncertainties:** Uncertainty has been identified, particularly in the long term, as market forces beyond the control of the policy will affect employment rates and the local economy.

**Recommendations:** The policy could be improved by adding reference to seeking high quality public green space in connection with public areas such as in town centres, especially where improvements to the public realm are mentioned and where regeneration is being sought.

It is recommended that the policy wording is altered to make reference to developing on previously developed land – could a target be set for 100% of new commercial development to be built on previously developed land?

## Policy S4 – Transport

The policy performs well against the SA Framework, and in particular in relation to objectives about transport and travel, climate change and energy, air quality, and provision of essential infrastructure. The policy also supports the achievement of SA objectives relating to access and services, health and well being, liveability and place, built and historic environment, biodiversity, education and skills, local economy, regeneration and efficient use of land and tackling worklessness. The policy supports identified transport infrastructure programmes which will take place in the short term, such as the South London Route Utilisation Strategy (2008) and some underground upgrades (Victoria Line upgrade, Northern line upgrade part 1 and Vauxhall over-ground station platform improvements. Other infrastructure programmes / schemes referred to in the policy do not have funding in place and are longer term aspirations. These include the Cross River Tram, the Croydon Tramlink extension to Crystal Palace and the potential for an east London line station at Brixton. There is therefore some uncertainty recognised in the performance of the policy in the long term with regard to SA Objective Provision of Essential Infrastructure.

The policy performs similarly to the former Policy S5 Transport within the Draft Core Strategy (March 2009), however it is slightly weaker in terms of Access and Services and Equality and Diversity and because it no longer explicitly seeks to maximise the use of public transport by people with disabilities, the elderly, young children and others for whom public transport accessibility is a barrier. This is now included within the supporting text for the policy (paragraph 4.25). The policy is also contains less detail, which it is intended will now be dealt with within the Development Management DPD. This includes providing for a network of electric vehicle charging points (which would be favoured by the SA and is also in accordance with London Plan guidance (the Mayor of London's Sustainable Design and Construction Supplementary Planning Guidance (2006)). The need for development to provide travel plans or transport assessments in accordance with the Transport for London requirements will also now be dealt with in the Development Management DPD.

**Uncertainties:** The delivery of public transport infrastructure programmes in the long term.

**Recommendations:** Providing for a network of electric vehicle charging points and the need for development to provide travel plans or transport assessments in accordance with the Transport for London requirements should be included within the Development Management DPD.

## Policy S5 – Open Space

The appraisal team welcomes the inclusion of a green infrastructure core policy which addresses biodiversity, trees and open space in a holistic and strategic way. The policy performs well against most of the SA Objectives, in particular, biodiversity, climate change and water resources and flood risk management. Effects on biodiversity are recorded as more positive in the medium and long term as it is recognised that it may take a couple of years for new green roofs and other green spaces to be developed and to become established. Similarly, for other SA Objectives, the effect identified in the short term is neutral, such as for climate change and water resources, as the delivery of new open space and green roofs may take a few years to be realised.

**Uncertainties:** The policy does not make reference to any targets or open space standards per head of population or standards for new developments. Will these be set out within another DPD?

Access for people of different abilities / ages etc is not mentioned within the policy. Will an open space strategy address access issues?

**Recommendations:** It is recommended that text is added to the policy to require developers to demonstrate the effects on ecology and biodiversity are in the first instance avoided, or if effects could occur, these are fully mitigated and an overall residual effect of a net biodiversity enhancement is achieved in major developments (including previously developed land if appropriate).

The policy or supporting text should cross refer to specific design guidance, tree planting programmes, or other policy documents as appropriate, which set out requirements for developers to contribute to tree planting programmes.

If another document will address access to open space for different users, such as cyclists and Lambeth's main equalities groups, it should be referred to in the policy. If access to open space is not addressed within another document, it should be addressed in this policy.

## Policy S6 –Flood Risk

Policy S6 contributes to the achievement of a number of the SA Objectives with regard to water resources and flood risk management. In line with the SFRA the policy sets out how flood risk will be managed in accordance with PPS25 and how the sequential test will be applied.

The policy has been made more robust through consultation with the Environment Agency. For example, it now seeks to steer development towards areas of lowest flood risk which is an improvement on the Draft Core Strategy policy, which was not as explicit with regards to sequential testing.

**Uncertainties:** There is some uncertainty recorded in the matrix in the short term as improvements of flood defences (particularly on the banks of the River Thames) and the delivery of new SUDS / water attenuation measures are dependent on new development and it is therefore not certain that these will be delivered in the short term.

**Recommendations:** It is recommended that the Development Management DPD includes the avoidance of pollution and the protection of water quality within policy.

### **Policy S7 – Sustainable Design and Construction**

The policy amalgamates previous Draft Core Strategy policies S11 Sustainable Design and Construction and S9 Sustainable Energy Use, with some other additions / alterations.

The policy should have a positive performance with regard to most of the SA Objectives, although there is uncertainty because the policy itself does not set out any targets or specific requirements (apart from making reference to London plan carbon reduction targets), but instead these will be detailed within a Development Management DPD and/or relevant SPD. Uncertainty particularly applies in the short term because the Development Management DPD and SPD will be adopted after the Core Strategy.

The Council has responded to the previous SA recommendations made regarding sustainable development targets (with regard to Draft Core Strategy Policy S11) and has stated that they are too detailed for the Core Strategy and will be addressed through the preparation of the Development Management DPD and/or relevant SPD. Some of the recommendations made previously are therefore repeated below with reference to the Development Management DPD and the relevant SPD to be developed.

The policy does not mention sustainable waste management and it is felt that this is an omission from the last paragraph of the policy, even though sustainable waste management is dealt with strategically in Policy S8 Sustainable Waste Management.

**Uncertainties:** As mentioned above, although the policy is potentially in accordance with most of the policies, there is uncertainty because the policy itself does not set out any targets or specific requirements. These will be detailed within the Development Management DPD with guidance provided within a Supplementary Planning Document (SPD). Uncertainty particularly applies in the short term because the Development Management DPD and SPD will be adopted after the Core Strategy.

## **Recommendations/Mitigation**

### Recommendations for the Submission Core Strategy

The last paragraph of the policy should mention sustainable waste management, even though sustainable waste management is dealt with strategically in Policy S8 Sustainable Waste Management.

What constitutes a major development needs to be identified within the Core Strategy and/or within the Development Management DPD.

### Recommendations for the Development Management DPD and supporting SPD

It needs to be ensured that safeguarded existing heat, cooling and power networks are low carbon or carbon neutral and have been subject to an appropriate environmental risk assessment and method statement. Development Management may provide the best mechanism for ensuring this.

If it is the case that sustainable development targets will only be set within the Development Management DPD, the DPD should either set out the timeframes for achievement of the mandatory Code for Sustainable Homes or BREEAM Levels for private developers:

For example:

2010 – minimum Code level 3

2013 – minimum Code level 4

2016 – minimum Code level 6

Or alternatively, should state that the Code level targets to be achieved are those as set by the Government (in the event that these target dates should change).

The policy should state an aspiration for large scale housing developments within the Borough to achieve Code level 4 prior to 2013.

Sustainability Assessments should be required for all developments. The thresholds at which a sustainability assessment is required should be stated and indication of the level of detail required for different scales of development should be provided. For example, the minimum topics that should be covered could be listed, or it should be a requirement of the policy that the sustainability assessment should be in line with the Mayor's Sustainable Design and Construction SPD and that this should be followed for major developments. Specific guidance for smaller developments will need to be provided as a minimum. This could consist of a sustainability checklist for householder and minor developments. This checklist should be aligned with the SA objectives within this report. In addition, the Development Management DPD and the SPD should be in accordance with all of the SA Objectives.

The Development Management DPD and SPD referred to in the policy should require developers to demonstrate that provision has been made for the necessary infrastructure needed for their development to take place and that it will be delivered in pace with development.

## **Policy S8 – Sustainable Waste Management**

The policy sets out measures to ensure adequate land and facilities for waste management over the LDF period, however it does not set out in detail how waste will be managed in a sustainable manner. Cross reference is required to another policy or document which sets out what adequate facilities might be – will this be in the Lambeth Waste Strategy or the Sustainable Design and Construction SPD?

**Uncertainties:** The policy does not define what 'appropriate waste and recycling storage and collection facilities in all new development' might be or where these requirements will be set out.

The location of new waste management sites will be allocated through an allocation DPD and are as yet unknown.

The performance against the air quality objective (no. 14) is uncertain as the impact of this policy on transport is unknown (although the policy does set out some requirements relating to the location of new waste management sites which includes rail and water access) and it is also unclear whether the types of waste management facility to be developed in the Borough could have any positive or negative effect on local air quality.

**Recommendations:** Cross reference is required to another policy or document which sets out what is required in new developments with regard to appropriate waste and recycling storage – will this be in the Lambeth Waste Strategy or the Sustainable Design and Construction SPD?

The policy should make reference to achieving the waste management targets of the London Plan, such as achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and 80% recycling of that waste as aggregates in London by 2020)

## **Policy S9 – Quality of the Built Environment**

Several of the SA recommendations previously made (in relation to Draft Core Strategy policy S12 Quality of the Built Environment) have been taken on board within the Submission Core Strategy policy S9 Quality of the Built Environment. These include:

- Inclusion of references to ensuring that the public realm is child-friendly and encourages physical activity.
- Inclusion of text within sub-section (e) "...and includes safe and attractive pedestrian and cycle routes within and through neighbourhoods, linked to green spaces and public transport nodes and interchanges."

- Sub-section (e) now includes a reference to incorporating ecological features into the public realm.
- S9 (a) now states that "Innovation in design will be supported and encouraged, particularly where this...creates new high quality areas of public realm."

These amendments have improved the performance of the policy.

The policy generally performs well against the social and economic SA Objectives and performs very positively with regard to crime and safety, health and well-being, liveability and place, built and historic environment, transport and travel and local economy. The policy also contributes positively to access and services, equality and diversity, biodiversity, regeneration and efficient use of land and tackling worklessness. The policy is deemed to have a neutral performance with regard to climate change and energy, water resources and flood risk management, air quality and waste because although these issues are generally covered by other core policies and forthcoming DPDs, there is an opportunity to link these issues with good design in this policy.

**Uncertainties:** Some uncertainty has been identified in the short term as some of the benefits of the policy, such as improved safety, are dependent on new development and may take a few years to be realised.

**Recommendations:** The Development Management DPD should refer to the need to design/ retrofit new/existing buildings to cope with future climates, particularly in relation to impacts other than flooding.

The Development Management DPD should encourage public art.

## Policy S10 – Planning Obligations

The policy provides a 'hook' on which to hang a Planning Obligations SPD. The policy performs well against objectives which relate to provision of services and facilities, health and well-being, transport and other essential infrastructure because there is some confidence that these will be included within the Planning Obligations SPD. There is potential for positive effects against a number of other objectives such as in relation to biodiversity, crime and safety, built and historic environment, climate change and energy, liveability and place, water resources and flood risk management, waste, education and skills and tackling worklessness. However, there is some uncertainty regarding this effect as these elements may or may not be included within the Planning Obligations SPD or the area-based SPDs.

**Uncertainties:** The policy does not set out the types of projects, facilities, services etc that contributions may be put towards and therefore the appraisal records some uncertainty as there is potential for the policy to contribute to some of the SA Objectives but it depends on what is set out within the SPD. There is some uncertainty in the short term as benefits of the policy will be dependent on development coming forward, and therefore it could take a few years for benefits to be realised.

**Recommendations:** No mitigation has been identified in order to offset any potential negative effects of this policy. A number of recommendations have been identified to improve the policy and to be taken into consideration in the preparation of the Planning Obligations SPD and in site specific area based SPDs. The recommendations are as follows:

- If appropriate, the policy could set out the types of services and facilities that contributions will be used for. This will help demonstrate how the developer contributions will be used to address some of the identified sustainability issues within the Borough.
- The policy makes reference to controlling phasing but could make it clearer that facilities and infrastructure would need to be put in place at an appropriate time to meet the needs of new development in order to ensure that there is no time lag between need and delivery of facilities.
- The SPDs should enable planning obligations to be used to improve environmental conditions in deprived areas and communities.
- The SPDs should include taking contributions for enhancing the quality and quantity of open space and the public realm and promoting community engagement, such as contributing towards a community co-ordinator in regeneration areas.
- The SPDs should include taking contributions for enhancing the quality and character of the built and historic environment and the provision of cultural facilities.
- The SPDs should include taking contributions towards maintaining and enhancing the biodiversity of the Borough to contribute to the BAP and green infrastructure.
- Consideration should be given to the need for the SPDs to contribute to the retrofitting of existing buildings or energy infrastructure needed to support new development.
- There could be potential for the SPDs to take contributions towards off-site SUDs for example and this should be considered when the SPD is prepared.
- There could be potential for the Planning Obligations SPD to take contributions towards sustainable waste management facilities, such as a recycling centre and this should be considered when the SPD is prepared.
- The Planning Obligations SPD could also support the planting of trees and this should be considered in its preparation.

## Place policies

The appraisal matrices for the place policies are also set out in Appendix 3. The Submission draft contains only minor changes to the Draft Core Strategy, so these

have not been reappraised. However, the summaries below reflect any minor changes made at Submission stage, including improvements made as a result of our recommendations on the Draft strategy. However, policy PN10 is a new policy.

## Policy PN1 Waterloo

Whilst the policy scores well on the social and environmental objectives, including transport and the built environment, it could give more attention to the needs of identified equality target groups. The Submission version has been improved in relation to climate change adaptation and flooding issues. There are a number of issues relating to some of the environmental objectives where the policy could be tightened up or clarified, in particular with relation to waste management and retrofitting existing buildings to help tackle climate change. Whilst the policy scores well on sustainable transport, it is not clear how much of a positive impact it will have on the areas air quality. In addition, there may also be a tension between the cultural/ tourism/ entertainment uses of the area and residential amenity which could be managed via partnership working (for example).

**Uncertainties:** It is not clear what the needs are of particular equality target groups within the area.

### Recommendations:

- Clarify how the area contributes to the Borough's waste management approach;
- Ensure that water and sewerage infrastructure keeps pace with development.

## Policy PN2 Vauxhall

The policy aims to deliver London Plan targets for 3,500 new dwellings and 8,000 new jobs in a London Plan Opportunity Area. Therefore, it scores positively on issues relating to health (as homes and jobs are key determinants of health), housing, liveability and economic issues. The main concern with the policy is whether the new jobs proposed are capable of being supported by concomitant public transport capacity and improvements. The policy is far less convincing than the Waterloo policy in terms of enabling essential infrastructure (physical, social) to keep pace with growth: it may improve access to jobs and housing – but there is little detail on other essential infrastructure such as schools, health facilities and services, water and sewerage. If the policy results in greater road travel, particularly private car use it could worsen existing congestion and contribute to air quality and climate change problems. There is no reference to waste management facilities: whilst the area is not a Preferred Industrial Location in the London Plan, it presumably is a Local Employment Area and therefore would be suitable (in London Plan terms) as a broad location for much needed waste management facilities. The area falls within Flood Zone 3a and therefore we would expect reference to flood risk and the need to maximise opportunities to strengthen defences when opportunities arise. It also fails to address the issue of retrofitting: how the bulk of the areas existing buildings will reduce their impact on carbon emissions. In addition, the area lies within a London Plan Area for

Regeneration, meaning it suffers some of London's/Lambeth's worst levels of deprivation: this status should be referred to with the associated London Plan policy 2A.7 requirements (these include improvements to learning and skills, health, safety, access, employment, environment and housing). Although the supporting text to the policy refers to the area supporting a number of gay nightlife venues, the needs of this and other equality target groups are not referred to in the policy.

**Uncertainties:** These relate to: the degree to which new jobs and housing are supported by essential physical and social infrastructure, in particular public transport capacity; and whether there are specific needs relating to identified equality target groups and how these could be met.

#### **Recommendations:**

- Need to make reference to the potential negative impacts of flood risk and the need for appropriate improvement measures, particularly in relation to any opportunities offered by development on riparian sites (e.g. improvements to flood defences);
- Clarify how the area contributes to the Borough's waste management approach;
- Ensure that water and sewerage infrastructure keeps pace with development;

### **Policy PN3 Brixton**

Generally this policy scores well across most objectives. In strengthening Brixton's role as a town centre, with an increased offer related to employment (including cultural and green businesses), housing and various town centre facilities, it should reduce people's need to travel more widely. In addition, the commitment to an energy strategy, the promotion of green businesses, and the adoption of 'One Planet Living' principles should all help to make Brixton a sustainable centre (and we note local initiatives such as 'Brixton Green' and 'Transition Town Brixton', which should assist in the development of this new green identity).

The only significant negative involves a question mark over the provision of appropriate physical and social infrastructure to support its expanded role. There is a need for more school places in Brixton, yet the policy does not address this issue. It also omits to address issues around water infrastructure. Climate change adaptation is not addressed, nor is the built/historic environment particularly well dealt with.

**Uncertainties:** None identified

#### **Recommendations:**

- Add policy wording on social and physical infrastructure needed to keep pace with Brixton's development, particularly schools and water/ sewerage;

- Clarify One Planet Living principles;
- Address climate change adaptation issues, both in the design of new development and in seeking to retrofit existing buildings;
- Seek biodiversity opportunities in the public realm, pocket park developments, where appropriate.

## **Policy PN4 Streatham**

The policy scores negatively, or uncertain, on a number of objectives due to lack of attention to: energy and climate change (mitigation or adaptation), physical and social infrastructure, the needs or equality target groups, sustainable design and construction, water issues, waste management, training and skills, and child care facilities. The policy aims to strengthen the retail and entertainment offer, but appears to provide little else for local people. The main concern is that existing road traffic problems will worsen and the proposals will foster greater reliance on the private car, thus worsening congestion and air quality issues.

**Uncertainties:** what are the needs of equality target groups – are there any and how have they been addressed?

### **Recommendations:**

- Define how built and historic heritage issues will be addressed; and
- Define the role sustainable design and construction will play.

## **Policy PNS Clapham**

The policy seeks limited change in seeking to reinforce the character and nature of the area. There will be some limited social benefits, but there is no reference to a suite of environmental issues. The Submission version has improved policy content in relation to local transport improvements.

**Uncertainties:** None identified

### **Recommendations:**

- Better address public transport capacity issues for existing and future residents/ uses;
- Address sustainable infrastructure issues (water, waste, new build etc);
- Clarify the issue of school place need;
- Address the need to improve social cohesion in such a socio-economically diverse area.

## **Policy PN6 Stockwell**

The policy scores positively on many of the social objectives, as its main focus is in improving the local environment of existing housing estates. Public transport is already good and although the policy seeks to retain existing employment and seek opportunities for new jobs, it is likely that the vast majority of working residents will still commute out of the area to work. The vast majority of these journeys are by public transport.

**Uncertainties:** include whether there are current capacity issues with public transport in the area, especially with growth expected in other parts of the Borough/ system; and any specific needs of equality target groups that may be unaddressed.

**Recommendations:** None.

## **Policy PN7 Oval**

The main focus of the policy is to secure enhanced local community benefits from The Oval Stadium: therefore it scores positively on most social objectives, given it lies in a London Plan Area for Regeneration (area of high deprivation). However, more detail on the need for various social infrastructure (e.g. schools, health care etc) would be desirable. The policy scores less well on the environmental sustainability objectives, where there is no mention of issues around climate change (mitigation or adaptation), water conservation or waste management. As the area lies in Flood Zone 3a, the policy should reference flood risk issues and opportunities.

**Uncertainties:** Whether there are current capacity issues with public transport in the area, especially with growth expected in other parts of the Borough/ system; and any specific needs of equality target groups that are unaddressed.

**Recommendations:**

- Refer to to Flood Zone 3a and appropriate measures set out for new build and existing vulnerable uses;
- Refer to sustainable design and construction techniques.
- Address school, health, water and transport capacity issues.

## **Policy PN8 West Norwood and Tulse Hill**

The policy scores well on a range of social and economic objectives, especially in terms of providing a wide range of community facilities, including meeting educational and training needs. Transport is likely to remain an issue in an area currently suffering heavy congestion and with few significant transport proposals to improve the situation: again, this is likely to have a knock on impact on air quality. Whilst there is mention of the creation of local energy CCHP energy networks – which is very welcome – other aspects of environmental sustainability (sustainable design and construction, water and waste issues, climate change

adaptation) are missing. This may result in missed opportunities, e.g. in the construction of new sustainable schools, provision of much needed waste management facilities within the commercial areas or in retrofitting housing estates as part of refurbishment programmes. Again, child care facilities are ignored. Whilst the issue of housing conversions is raised in the supporting text, this is not supported by any policy content.

**Uncertainties:** none.

**Recommendations:**

- It is suggested that the housing core policy (S3) is amended to control house conversions to retain larger family units, where there is an identified need.
- Include wording around sustainable design and construction and consider retrofitting low carbon solutions as part of estate refurbishment.

### **Policy PN9 Herne Hill**

The policy seeks to develop the area as a community focussed district centre, with relatively modest proposals that revolve around improvements to the public realm and transport (including road junction improvements) and maintenance of retail. There is insufficient detail in the policy to enable many of the objectives to be scored positively: many have been left as uncertain, whereas others have been scored negatively as it is unlikely that the policy would make a positive contribution to tackling significant social and environmental issues.

**Uncertainties:** the policy does not contain sufficient information on a number of sustainability areas to allow the objectives to be scored.

**Recommendations:** More detail is required within this policy in relation to the uncertainty and the negative effects identified.

### **Policy PN10 Local centres**

The policy is aimed as a general catch all for other parts of the borough not addressed by the specific area policies. However, there is insufficient information to make a judgement on many of the objectives. In as much as local centres are supported, then this may contribute to greater local access to a (limited?) number of services and facilities: as such there may be benefits in terms of reducing the need to travel (and knock on benefits for CO<sub>2</sub> emissions and air quality).

Uncertainties See above.

Recommendations

More detail is required within this policy in relation to the uncertainty and the effects identified.

## **5.4 Potential for Cumulative Effects**

Potential for negative cumulative effects on local air quality has been identified in association with new on-site renewable energy generation. Not all technologies may be suitable for a built up area such as Lambeth (AEA Energy and Environment 2007<sup>7</sup>) with regard to potential air quality effects of wood fuelled biomass in London.

The suggested mitigation for this potential cumulative effect is that sub-section (f) of Policy S9 should be amended to clarify that new energy developments must be developed in appropriate locations with regard to the local physical environment, sensitive receptors and local air quality. The potential cumulative effect of a new biomass boiler on local air quality will need to be assessed at the planning application level and this should be included within the Development Control DPD.

There is potential for positive cumulative effects on biodiversity, as Policy S7 promotes the creation of new habitats and creating better connections between green spaces. Opportunities to enhance this potential cumulative effect should be maximised through encouraging development to incorporate appropriate species and create suitable habitats which link into the wider biodiversity network. This could be achieved through the inclusion of specific targets within the Sustainable Design and Construction SPD.

There is a potential for a negative cumulative effect in relation to the provision of school places because the area policies appear to address the delivery of school places in an inconsistent manner. This could result in a lack of schools places in some areas and overcrowding in others.

The supporting text for some of the area policies acknowledges public transport capacity issues. There is a potential negative cumulative effect of development in Lambeth and neighbouring boroughs on the capacity on public transport networks, arising from the resultant population increase. Capacity issues in Lambeth could be exacerbated by development in neighbouring areas, for example, further down the Victoria and Northern Lines. This could in turn exacerbate capacity issues elsewhere in central London.

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<sup>7</sup> AEA Energy & Environment (2007) Review of Potential Impact on Air Quality from Increased Wood Fuelled Biomass Use in London.

# 6. Implementation

## 6.1 Proposals for monitoring

What the SEA Regulations say...

*Information for Environmental Reports...*

9. A description of the measures envisaged concerning monitoring in accordance with regulation 17, which states:

*17 (i) The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*

*17 (ii) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with 17(i).*

The monitoring undertaken on the plan will help to:

- Monitor the significant effects of the plan;
- Track whether the plan has had any unforeseen effects;
- Ensure that action can be taken to reduce / offset the significant effects of the plan; and
- Provide baseline data for the next SA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

The requirements of the SEA Regulations focus on monitoring the effects of the plan. This equates to both the plan's significant effects and also unforeseen effects. As the ODPM (2005) guidance states it may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to the implementation of the Core Strategy when they occur. Due to this difficulty we have suggested a number of more general monitoring indicators and then, where possible linked them to the issues within the plan area.

The Good Practice Guide on Local Development Frameworks advises that<sup>8</sup> the monitoring of significant sustainability effects should be integrated with other monitoring of Local Development Frameworks. For this reason, Lambeth Council will report significant sustainability effects in future Annual Monitoring Reports published each December. The significant sustainability effects indicators have been drawn from the indicators in the baseline data of this Sustainability Appraisal (contextual indicators) and are also linked to the potential adverse effects identified within the appraisal of policies (significant effects indicators). The indicators aim to:

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<sup>8</sup> Para 2.4

- Concentrate on the key sustainability issues identified in the appraisal;
- Provide information to identify when problems, including unexpected ones, arise; and
- Contribute to addressing deficiencies in data availability identified in this appraisal.

Monitoring will allow the Council to identify whether the recommended mitigation measures from the SA have been effective and develop further mitigation proposals that may be required where unforeseen adverse effects are identified. In some cases monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the Core Strategy, or for further policy guidance to be developed (for example an SPD).

It will be up to the Council to consider the practicalities of monitoring and what might be achievable.

Table 7.1 below sets out the monitoring programme.

**Table 7.1: Monitoring Programme**

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
Access to good, affordable housing.	<p>London Plan borough housing target: 11,000 additional homes (2007/8 to 2016/17) or 1,100 per annum.</p> <p>50% should be affordable and within this 70% social housing and 30% intermediate provision.</p> <p>'Mayor's Strategic Housing Investment Plan will set out the timetable for moving from Code for Sustainable Homes level 3 to higher levels'.</p> <p>Targets set for Opportunity Areas employment capacity and minimum homes (Waterloo; and Vauxhall)</p> <p>Lambeth Sustainable Community Strategy (2008-2020):</p> <p>Aiming to achieve the council's policy for 50% affordable housing with subsidy and 40% without subsidy wherever possible in development proposals</p> <p>Lambeth LAA target – number of affordable homes delivered:</p> <ul style="list-style-type: none"> <li>• 480 – 2008/09</li> <li>• 550 09/10</li> <li>• 570 10/11</li> </ul>	<p>COI H5 – Gross affordable housing completions</p> <p>LOI 2 – Number of new-build affordable dwellings completed</p> <p>LOI 3 – Proportion of all new-build dwellings completed (on sites to which Policy S3(d)</p>	<p>Annual</p> <p>Annual</p> <p>LBLC</p>	<p>Lambeth Borough Council (LBLC)</p>

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
		Housing need in relation to NI 155 (number of affordable homes delivered) and information on changing needs.	Annual	LBLC
		COI H1 - Plan period and housing targets	Annual	LBLC
		COI H2(a) – Net additional dwellings in previous years	Annual	LBLC
		COI H2(b) – Net additional dwellings for the reporting year	Annual	LBLC
		COI H2(c) – Net additional dwellings in future years	Annual	LBLC
		COI H2(d) – Managed delivery target	Annual	LBLC
		COI H6 – Housing quality building for life assessments	Annual	LBLC
		Percentage of new homes	Annual	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
Housing mix and types.	built to Lifetime Homes standards.	LOI 4 – Proportion of completed homes with 3 or more bedrooms COI H4 – Net additional gypsy and traveller pitches	Annual	LBLC
Infrastructure provision, including healthcare services and facilities; and schools	London Plan performance indicator: An increase in the provision of childcare places per 1000 under 5s, particularly in Areas for Regeneration.	LOI 12 - Level and type of planning obligations received	Annual	LBLC
Cohesive communities and meeting the needs of diverse communities.	London Plan performance indicators: % of lone parents to be no higher than for the UK average by 2016, 50% reduction of the difference by 2011.	Index of multiple deprivation	Annual	LBLC
Tackling crime and addressing fear of crime.	None.	Number of criminal offences	Annual	LBLC, data from police force
		LOI 11 –	Annual	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
Good local access to services and facilities.	None.	Percentage of planning approvals for ten or more residential units receiving Secured by Design accreditation	Proximity of housing development to services, facilities and employment	Annual LBLC
Increasing jobs, particularly local jobs for local people.	South west sub region of London projected to provide 70,000 more jobs by 2026.  London Plan performance indicator: Age specific unemployment rates for black and minority ethnic groups to be no higher than for the white population by 2016, 50% reduction of the difference by 2011.		Overall employment rate	Annual LBLC
Addressing high rates of child poverty.	National Government target: To eradicate child poverty by 2020		Jobs density Children in poverty	Annual LBLC
Economic development	London Plan targets: Achieve 40,000 net additional hotel bedrooms by 2026		Net additional serviced bedrooms (visitor accommodation )	Annual LBLC
			New business registrations	Annual LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
		Proportion of major office development in preferred locations	Annual	LBLC
		COI BD1 – Total amount of additional employment floor-space, by type	Annual	LBLC
		COI BD 2 – Total amount of employment floor-space on previously developed land, by type	Annual	LBLC
		COI BD 3 – Employment land available, by type	Annual	LBLC
		Road traffic casualty rates	Annual	LBLC
		Retail vacancy in town and district centres	Annual	LBLC
		COI BD 4 – Total amount of floor-space for 'town centre uses'.	Annual	LBLC
Reducing CO2 emissions and the efficient use and	London Plan targets: 60% reduction of CO2 emissions by 2050: • 15% by 2010	COI E3 – Renewable energy	Annual	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
management of energy.	<ul style="list-style-type: none"> <li>• 20% by 2015</li> <li>• 25% by 2020</li> <li>• 30% by 2025. (against 1990 base)</li> </ul> <p>20% reduction in CO2 emissions from on site renewable energy generation for new developments.</p> <p>Identify sites for zero carbon developments.</p> <p>99 MW installed capacity electricity generated from renewable by 2010 rising to 375.1MW by 2020.</p> <p>London Plan performance indicator: Production of 945GWh of energy from renewable sources by 2010 including at least 6 large wind turbines.</p> <p>Lambeth LAA: Per capita Co2 emissions reductions of 2% (08/09), 5% (09/10) and 10% (10/11) on baseline of 5.5 tonnes per capita.</p> <p>Lambeth SPD on Sustainable Design and Construction:</p> <p>UDP Policy 34 requires all major development of more than 1,000 square metres or providing 10 dwellings or more to incorporate equipment for renewable power generation so as to provide at least 10% of their predicted energy requirements. This should be assessed in terms of CO2 emissions. The 10% predicted energy requirement will be assessed in terms of carbon dioxide emissions as this is now the standard approach taken to this issues in national policy and by the Mayor of London. It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10% through on site renewable energy generation, Policy 4A.7 in the London Plan aims to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The</p>	generation  NI 186 – Per capita CO2 emissions in local authority area.		

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
Climate change adaptation, including flood risk management	Council encourages and supports this aim for all applications.	COI E1 – Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.	Annual	LBLC
Tackling congestion and increasing public transport use, cycling and walking.	<p>London Plan targets: Increasing the capacity of public transport in London by up to 50% by 2026.</p> <p>Reduce weekday traffic by 15% in central London where congestion charging applies; Achieve zero growth across the rest of inner London.</p> <p>However, London Plan targets were adjusted through TfL's Local Implementation Plan guidance. London Plan stated a traffic reduction of zero growth across Inner London but LIP guidance adjusted this to -2 for the Central sub region (which includes Lambeth).</p> <p>Therefore Lambeth's target is a 2% reduction of weekday traffic. However, the target applies at a London-wide level. Boroughs must publish a target in their LIP setting out their contribution to the London-wide target, taking account of local factors.</p> <p>London Plan performance indicators:</p> <ul style="list-style-type: none"> <li>A 5% increase in passengers and freight transported on the blue ribbon network from 2001-2011</li> <li>Maintain at least 50% of B1 development in PTAL zones 5-6 and at least 90% of B2 and B8 development in zones 0-2.</li> </ul>	Main mode for journey to work	Census data every 10 years	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
	Efficient use and management of resources.	<p>The numbers of 'Green Travel Plans' submitted for large/major developments</p> <p>LOI 6 – Number of passengers using rail and underground stations</p> <p>School travel</p> <p>Car ownership</p> <p>LOI 7 – Public Transport Accessibility Levels</p> <p>COI H3 – New and converted dwellings on previously developed land</p> <p>CO1 BD2 – Total amount of employment floorspace on previously developed land,</p>	<p>Annual</p> <p>Annual</p> <p>Annual</p> <p>Census data every 10 years</p> <p>Annual</p> <p>Annual</p>	<p>LBLC</p> <p>LBLC</p> <p>LBLC</p> <p>LBLC</p> <p>Data from Transport for London</p> <p>LBLC</p>

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
Efficient use and management of water.	<p>Lambeth SPD on Sustainable Design and Construction:</p> <p>The Council aspires to BREEAM "Excellent" and seeks "Very Good" as a minimum standard.</p> <p>In line with the Energy Saving Trust's minimum recommendation, the Council seeks the achievement of Code Level 3 as a minimum standard and aspires to Code Level 4 in the majority of developments.</p> <p>Lambeth SPD on Sustainable Design and Construction:</p> <p>Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day (also a London Plan target, to be reviewed in light of Code for Sustainable Homes targets, essential standard of 80 litres/ person / day by 2016 at latest).</p> <p>Achieve 50% attenuation of the undeveloped site's surface water run off at peak times: (this is a minimal target -London Plan policy 4a.14 states that developers should aim to achieve Greenfield run off from sites through incorporating rainwater harvesting and sustainable drainage.</p> <p>Lambeth SPD on Sustainable Design and Construction:</p> <p>Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a</p>	COI E1 – Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds  by type	Annual	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
Pressure on biodiversity	<p>minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day.</p> <p>London Plan targets: (those appropriate to Lambeth's BAP priority habitats): Conservate/Increase by 2015:</p> <ul style="list-style-type: none"> <li>• 1300 ha/ 20ha acid grassland</li> <li>• 12,800ha/ 20ha woodland</li> <li>• 2,300 ha/ 1 saltmarsh or mudflat of Tidal Thames;</li> <li>• 1744 ha conserved ponds, lakes and reservoirs;</li> <li>• 185 ha conserved or created wasteland (equivalent to Lambeth's built environment habitat?)</li> </ul>	Percentage increase / decrease in Local BAP habitats (ha)	Annual	LBLC
Pressure on open spaces	<p>Lambeth Open Space Strategy recommended that Lambeth should aim to double the number of good quality open spaces in the Borough.</p>	COI E2 – Change in areas of biodiversity importance.	Unrestricted open space per 1,000 persons	Annual
Improving air quality (and meeting EU targets).	<p>Air quality objectives have been set within London. For two pollutants – Particles (<math>PM_{10}</math>) and Polycyclic Aromatic Hydrocarbons (PAHs), further objectives have been set within the local air quality management framework. Details of the objectives can be found in the LBLC Annual Air Quality Report And Action Plan Updates, which can be accessed here:</p> <p><a href="http://www.lambeth.gov.uk/Services/Environment/Pollution/Air.htm">http://www.lambeth.gov.uk/Services/Environment/Pollution/Air.htm</a></p>	Concentrations of nitrogen dioxide and fine particulates	Annual	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
Addressing health inequalities	<p>London Plan performance indicators:</p> <p>By 2026 reducing by at least 10% the gap between life expectancy at birth in Areas for Regeneration and the average for London as a whole;</p> <p>By 2015 reducing by at least 10% the gap between the age standardised death rate from coronary heart disease per 100,000 population in Areas for Regeneration and the average for London as a whole</p>	Life expectancy of males and females	Annual	LBLC, data from Lambeth PCT
Sustainable waste management	<p>London Plan borough apportionment: 345,000 tonnes per annum by 2020 (municipal solid waste and commercial/ industrial waste). Current existing licensed capacity: 11,000 tonnes.</p> <p>Ensuring facilities to manage 75% (15.8 million tonnes) of waste arising in London provided by 2010 rising to 80% (19.2 million tonnes) by 2015 and 85% (20.6 mt) by 2020.</p> <p>Exceed recycling or composting levels in municipal waste of 35% by 2010 and 45% by 2015.</p> <p>Achieve recycling or composting levels in commercial and industrial waste of 70% by 2020</p> <p>Achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and 80% recycling of that waste as aggregates in London by 2020)</p> <p>(Boroughs need to ensure land resources available to implement the above).</p> <p>Boroughs in their DPDs should identify range of wm facilities to</p>	Deaths from heart disease < 75 years for males and females	Annual	LBLC, data from Lambeth PCT

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
<b>Significant effects indicators</b>	manage a capacity of 13mt municipal and commercial/ industrial waste to be provided 2005-2020.			
Biodiversity	<p>London Plan targets: (those appropriate to Lambeth's BAP priority habitats):</p> <p>Conserve/Increase by 2015:</p> <ul style="list-style-type: none"> <li>• 1300 ha/ 20ha acid grassland</li> <li>• 12,800ha/ 20ha woodland</li> <li>• 2,300 ha/ 1 saltmarsh or mudflat of Tidal Thames;</li> <li>• 1744 ha conserved ponds, lakes and reservoirs;</li> <li>• 185 ha conserved or created wasteland (equivalent to Lambeth's built environment habitat?)</li> </ul>	<p>Percentage increase / decrease in Local BAP habitats (ha)</p> <p>COI E2 – Change in areas of biodiversity importance</p>	<p>Annual</p> <p>Annual</p>	<p>LBLC</p> <p>LBLC</p>
Tackling climate change and reducing greenhouse gases	<p>London Plan targets: 60% reduction of CO<sub>2</sub> emissions by 2050:</p> <ul style="list-style-type: none"> <li>• 15% by 2010</li> <li>• 20% by 2015</li> <li>• 25% by 2020</li> <li>• 30% by 2025.</li> </ul> <p>(against 1990 base)</p> <p>20% reduction in CO<sub>2</sub> emissions from on site renewable energy generation for new developments.</p> <p>Identify sites for zero carbon developments.</p> <p>99 MW installed capacity electricity generated from renewable by 2010 rising to 375.1MW by 2020.</p> <p>London Plan performance indicator: Production of 945GWh of energy from renewable sources by 2010 including at least 6 large wind turbines.</p> <p>Lambeth LAA: Per capita Co<sub>2</sub> emissions reductions of 2% (08/09), 5% (09/10)</p>	<p>NI 186 – Per capita CO<sub>2</sub> emissions in local authority area</p>	<p>Annual</p>	<p>LBLC, data obtainable from DEFRA (although only 2006 data available at present)</p>

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
	<p>and 10% (10/11) on baseline of 5.5 tonnes per capita.</p> <p>Lambeth SPD on Sustainable Design and Construction:</p> <p>UDP Policy 34 requires all major development of more than 1,000 square metres or providing 10 dwellings or more to incorporate equipment for renewable power generation so as to provide at least 10% of their predicted energy requirements. This should be assessed in terms of CO2 emissions. The 10% predicted energy requirement will be assessed in terms of carbon dioxide emissions as this is now the standard approach taken to this issues in national policy and by the Mayor of London. It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10% through on site renewable energy generation, Policy 4A.7 in the London Plan aims to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The Council encourages and supports this aim for all applications.</p>			
Water conservation	<p>Lambeth SPD on Sustainable Design and Construction:</p> <p>The Council aspires to BREEAM "Excellent" and seeks "Very Good" as a minimum standard.</p> <p>In line with the Energy Saving Trust's minimum recommendation, the Council seeks the achievement of Code Level 3 as a minimum standard and aspires to Code Level 4 in the majority of developments.</p> <p>Lambeth SPD on Sustainable Design and Construction:</p> <p>Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day (also a London Plan target, to be reviewed in light of Code for Sustainable Homes targets, essential standard of 80 litres/ person / day by 2016 at</p>	COI E1 – Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds. (see also Sustainable Design and Construction below)	Annual	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
	<p>latest).</p> <p>Achieve 50% attenuation of the undeveloped site's surface water run off at peak times: (this is a minimal target –London Plan policy 4a.14 states that developers should aim to achieve Greenfield run off from sites through incorporating rainwater harvesting and sustainable drainage.</p> <p>Lambeth SPD on Sustainable Design and Construction:</p> <p>Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day.</p>			
Flood risk management	<p>Achieve 50% attenuation of the undeveloped site's surface water run off at peak times: (this is a minimal target –London Plan policy 4a.14 states that developers should aim to achieve Greenfield run off from sites through incorporating rainwater harvesting and sustainable drainage.</p>	COI E1 – Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.	Annual	LBLC
Sustainable waste management	<p>London Plan borough apportionment: 345,000 tonnes per annum by 2020 (municipal solid waste and commercial/ industrial waste). Current existing licensed capacity: 11,000 tonnes.</p> <p>Ensuring facilities to manage 75% (15.8 million tonnes) of waste arising in London provided by 2010 rising to 80% (19.2 million tonnes) by 2015 and 85% (20.6 mt) by 2020.</p> <p>Exceed recycling or composting levels in municipal waste of 35%</p>	COI W1 – Capacity of new waste management facilities	Annual	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
	<p>by 2010 and 45% by 2015.</p> <p>Achieve recycling or composting levels in commercial and industrial waste of 70% by 2020</p> <p>Achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and 80% recycling of that waste as aggregates in London by 2020)</p> <p>(Boroughs need to ensure land resources available to implement the above).</p> <p>Boroughs in their DPDs should identify range of wmt facilities to manage a capacity of 13mmt municipal and commercial/ industrial waste to be provided 2005-2020.</p>			
Air quality	<p>Air quality objectives have been set within London. For two pollutants – Particles (<math>\text{PM}_{10}</math>) and Polycyclic Aromatic Hydrocarbons (PAHs), further objectives have been set within the local air quality management framework. Details of the objectives can be found in the LBLC Annual Air Quality Report And Action Plan Updates, which can be accessed here:</p> <p><a href="http://www.lambeth.gov.uk/Services/Environment/Pollution/Air.htm">http://www.lambeth.gov.uk/Services/Environment/Pollution/Air.htm</a></p>	COI W2 – Amount of municipal waste arising and managed, by management type	Annual	LBLC
The setting of historical assets and impacts on townscape/cityscape	<p>Reduce number of listed buildings at risk.</p> <p>Ensure all Conservation Areas are covered by Character Area Appraisals that are no more than 5 years old.</p>	LOI 9 – Number of listed buildings and buildings on 'at	Annual	LBLC

Issue	Target (if set)	Potential Monitoring Indicators	Frequency of collection	Responsible party
Local and valued views		Risk' register LOI 10 – Number of conservation areas with up to date character appraisals	Annual	LBLC
Sustainable design and construction	<p>Government targets:            2010 – minimum Code level 3            2013 – minimum Code level 4            2016 – minimum Code level 6</p> <p>In line with the Energy Saving Trust's minimum recommendation, the Council seeks the achievement of Code Level 3 as a minimum standard and aspires to Code Level 4 in the majority of developments.</p> <p>LBL target:            The Council aspires to BREEAM "Excellent" and seeks "Very Good" as a minimum standard.</p>	<p>Percentage of Homes given planning permissions achieving Code for Sustainable Homes levels 3, 4, 5 and 6 (to be revised in 2013)</p>	Annual	LBLC

## **7.2 Next Steps**

A Sustainability Appraisal (SA) adoption statement will be published in accordance with the SEA Regulations (Statutory Instrument 2004 No. 1633 on The Environmental Assessment of Plans and Programmes). These regulations state that as soon as reasonably practicable after the adoption of the plan a statement should be produced and published setting out how environmental considerations and opinions expressed through consultation have been taken into account in the planning process.

The SEA Regulations set out the particulars that should be covered by the statement as follows:

- How environmental (sustainability) considerations have been integrated into the Core Strategy;
- How the Environmental (SA) Report has been taken into account;
- How opinions expressed in response to consultation have been taken into account;
- The reasons for choosing the Core Strategy as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental (sustainability) effects of the implementation of the Core Strategy.

For further information on the timetable with regard to the next steps in the production of Core Strategy please contact the Planning Policy team on 020 7926 1258 or email [planningpolicy@lambeth.gov.uk](mailto:planningpolicy@lambeth.gov.uk)

## 8. Glossary

<b>Acronym and title</b>	<b>Explanation</b>
AAP (Area Action Plan)	A Development Plan Document that provides a detailed planning policy framework for a part of the Council's area that is a key area for change or conservation
AMR (Annual Monitoring Report)	A document within the LDF that monitors progress in implementing the Local Development Scheme and the effectiveness of the Council's adopted policies
Core Strategy	A Development Plan Document that sets out the key elements of the planning framework, including strategic objectives and core policies, with which other DPDs must be in conformity
Development Plan	The statutory framework for planning decisions, comprising the Regional Spatial Strategy and the Development Plan Documents prepared by local planning authorities (including the County Council and District Councils)
DPD (Development Plan Document)	The main type of Local Development Document which form part of the Development Plan, and include a Core Strategy, site specific allocations, development control policies and area action plans
LDD (Local Development Document)	The main group of documents within the LDF, comprising Development Plan Documents and Supplementary Planning Documents
PPG (Planning Policy Guidance)	Government planning guidance notes on a number of different topics, now being incrementally replaced by Planning Policy Statements
PPS (Planning Policy Statement)	Government planning policy statements on a number of different topics which are being introduced to replace Planning Policy Guidance notes
Proposals Map	A map accompanying the LDF showing areas of protection and identifying locations for land use and development proposals included in the adopted Development Plan Documents
SA (Sustainability Appraisal)	A systematic process, required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development
SCI (Statement of Community Involvement)	A document within the LDF setting out the County Council's proposals for involving the local community and other stakeholders in the preparation of LDDs and the determination of planning applications
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) for the formal strategic assessment of certain plans and programmes which are likely to have significant effects on the environment
UDP (Unitary Development Plan)	A plan prepared by a Metropolitan District or Borough and some Unitary Local Authorities, which contains policies equivalent to those in both a structure plan and local plan but which is being superseded by Development Plan Documents



# Sustainability Appraisal and SEA of London Borough of Lambeth Core Strategy

Sustainability Appraisal Report

Appendix 1 – Review of Plans,  
Programmes and Policies

August 2009

August 2009

# **London Borough of Lambeth Local Development Framework Core Strategy**

## **Sustainability Appraisal Report**

A report by **CAG Consultants and ENVIRON** for London Borough of Lambeth

Written by: Joanna Peacock, Kaye Lyon, Chris Day, Emma Jones, Niall Machin and Denny Gray

Reviewed by: Johanna Curran

August 2009

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# Introduction

The review of plans, programmes and policies presented in this appendix is reproduced from Appendix 2 of the London Borough of Lambeth Local Development Framework Core Strategy Sustainability Appraisal Scoping Report, which has been subject to a five-week consultation with statutory consultees (Natural England, the Environment Agency and English Heritage) and other key stakeholders. The consultation period ran from Monday 3 November to Monday 8 December 2008. CAG Consultants and Environ, under the guidance of Lambeth Borough Council have since taken on board, as appropriate, the comments received during this consultation period. This version of the review of plans, programmes and policies reflects the changes made as a result of the consultation responses.

# Review of Plans, Programmes and Policies

**Table A1 - International Plans, Programmes and Environmental Protection Objectives**

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<b>Environment 2010: Our Future, Our Choice - EU Sixth Environment Action Programme (European Commission, 2002)</b>  The latest Environment Action Programme gives a strategic direction to the Commission's environmental policy over the next decade, as the Community prepares to expand its boundaries. The new programme identifies four environmental areas to be tackled for improvements: <ul style="list-style-type: none"><li>• Climate Change;</li><li>• Nature and Biodiversity;</li><li>• Environment and Health and Quality of Life; and</li><li>• Natural Resources and Waste.</li></ul>	Under the EAP framework, Thematic Strategies are being developed on: <ul style="list-style-type: none"><li>• Air quality;</li><li>• Soil Protection;</li><li>• Sustainable use of Pesticides;</li><li>• Marine Environment;</li><li>• Waste Prevention and Recycling;</li><li>• Sustainable Use of Natural Resources; and</li><li>• Urban Environment.</li></ul>	The themes that make up the EAP should be used, where applicable for the SA.  <b>Relevant to various SA objectives</b>
<b>European Sustainable Development Strategy (European Commission, 2006)</b>  This is a rolling programme which sets out how the EU will effectively live up to its longstanding commitment to meet the challenges of sustainable development. It reaffirms the need for global solidarity and the importance of strengthening work with partners outside of the EU.	The document provides a strategic framework for the Commission's environmental policy up to 2012.	The SA should ensure that an appraisal of sustainability and the issues addressed in this plan are fully integrated into the Lambeth Core Strategy.  <b>Relevant to various SA objectives</b> <ul style="list-style-type: none"><li>• Climate change and clean energy</li><li>• Sustainable transport</li><li>• Sustainable consumption and production</li><li>• Conservation and management of natural resources</li><li>• Public Health</li><li>• Social inclusion, demography and migration</li><li>• Global poverty and sustainable</li></ul>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<b>World Summit on Sustainable Development, Johannesburg (United Nations, 2002)</b>	<p>The World Summit reaffirmed the international commitment to sustainable development. The key outcomes were the Johannesburg Declaration and a key outcomes statement. The summit sought to:</p> <ul style="list-style-type: none"> <li>▪ Accelerate the shift towards sustainable consumption and production with a 10-year framework of programmes of action</li> <li>▪ Reverse the trend in loss of natural resources</li> <li>▪ Urgently and substantially increase the global share of renewable energy</li> <li>▪ Significantly reduce the rate of loss of biodiversity by 2010</li> </ul>	<p>There are no specific targets or indicators. However, key actions include:</p> <ul style="list-style-type: none"> <li>▪ Greater resource efficiency</li> <li>▪ Support business innovation and take up of best practice in technology and management</li> <li>▪ Waste reduction and producer responsibility</li> <li>▪ Sustainable consumer consumption and procurement</li> <li>▪ Create a level playing field for renewable energy and energy efficiency</li> </ul> <p><b>Relevant to various SA objectives</b></p>
<b>EU Sustainable Development Strategy (European Commission, 2006)</b>	<p>This document sets out a single coherent strategy on how the EU will meet long-standing commitments to sustainable development. This document presents a renewed version of the 2001 EU Sustainable Development Strategy (SDS). The aim of the SDS is to identify and develop actions to enable the EU to achieve continuous improvement of quality of life both for current and for future generations, through the creation of sustainable communities able to manage and use resources efficiently and to tap the ecological and social innovation potential of the economy, ensuring prosperity, environmental protection and social cohesion.</p>	<p>The key objectives of the strategy are:</p> <ul style="list-style-type: none"> <li>• Environmental protection;</li> <li>• Social equity and cohesion;</li> <li>• Economic prosperity; and</li> <li>• Meeting our international responsibilities.</li> </ul> <p>The guiding principles are:</p> <ul style="list-style-type: none"> <li>• Promotion and protection of fundamental rights;</li> <li>• Solidarity within and between generations;</li> <li>• Open and democratic society;</li> <li>• Involvement of citizens;</li> <li>• Involvement of businesses and social partners;</li> <li>• Policy coherence and governance;</li> <li>• Policy integration;</li> <li>• Use best available knowledge;</li> <li>• Precautionary principle; and</li> <li>• Making polluters pay</li> </ul> <p><b>Relevant to various SA objectives - all the objectives of the Strategy are relevant to the SA objectives. The guiding principles are more relevant to objectives related to crime and safety, equality and diversity, housing, climate change and energy, liveability, employment and, air quality.</b></p>
<b>Environmental Liability Directive (2004/35/EC)</b>	<p>The Directive is based on the polluter pays principle. Polluters are responsible for remediating the damage they cause to the</p>	<p>Annex I of the Directive includes criteria for determining whether effects are significant.</p> <p>The principles of environmental protection are of direct relevance to the SA and the Lambeth Core Strategy. The SA framework</p>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
environment or of measures to prevent imminent threat of damage.		should include a number of objectives addressing environmental protection in particular recognising the need to prevent pollution to air, land and water.
<b>Water Framework Directive (2000/60/EC)</b>	<p>The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which:</p> <ul style="list-style-type: none"> <li>• Prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems</li> <li>• Promotes sustainable water use based on a long-term protection of available water resources</li> <li>• Aims to enhance protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances</li> <li>• Ensures the progressive reduction of pollution of groundwater and prevents its further pollution</li> <li>• Contributes to mitigating the effects of floods and droughts</li> </ul>	<p>Objectives for surface and coastal waters:</p> <ul style="list-style-type: none"> <li>• Achievement of good ecological status and good surface water chemical status by 2015</li> <li>• Achievement of good ecological potential and good surface water chemical status for heavily modified water bodies</li> </ul> <p>The SA should include objectives that promote the protection and enhancement of the water environment. This includes the need to assess indirect effects such as dependent aquatic and terrestrial ecosystems and flooding. Information about the water environment needs to be gathered through the baseline data collation process, for example in relation to the location of main rivers and floodplain.</p> <p><b>SA Objective: Water quality and resources</b></p>
<b>Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)</b>	The main objectives of the Convention are to conserve wild flora and fauna and their natural habitats, especially those species and habitats whose conservation requires the co-operation of	There are no specific objectives, targets or indicators of relevance.

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
several States. Particular emphasis is given to endangered and vulnerable species, including migratory species. In order to achieve this the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1000 wild animal species. Each Contracting Party is obliged, in its planning and development policies and in its measures against pollution, to have regard to the conservation of wild flora and fauna.	<b>Conservation of Natural Habitats and Wild Fauna &amp; Flora (Directive 92/43/EC) (The Habitats Directive)</b>  The directive requires each Member State to prepare and propose a national list of sites for evaluation in order to form a European network of Sites of Community Importance (SCIs). Once adopted, these are designated by Member States as Special Areas of Conservation (SACs), and along with Special Protection Areas (SPAs) classified under the EC Birds Directive.	<p><b>Objectives</b></p> <ul style="list-style-type: none"> <li>The aim of this Directive shall be to contribute towards ensuring bio-diversity through the conservation of natural habitats and of wild fauna and flora in the European territory of the Member States to which the Treaty applies.</li> <li>Measures taken pursuant to this Directive shall be designed to maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest.</li> <li>Measures taken pursuant to this Directive shall take account of economic, social and cultural requirements and regional and local characteristics.</li> </ul> <p><b>Targets</b> Does not contain any targets.</p>
<b>Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)</b>	The Convention on the Conservation of Migratory Species of Wild Animals (also known as the Bonn Convention or CMS) is an intergovernmental treaty under United Nations Environment Programme. The aim is for contracting parties to work together to conserve terrestrial, marine and avian migratory species and their habitats (on a global scale) by providing strict protection for	<p><b>SA Objectives: Biodiversity, water quality and resources</b></p> <p>The SA should include objectives protecting and enhancing biodiversity and protected species.</p> <p><b>SA Objectives: Biodiversity, water quality and resources</b></p>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<p>endangered migratory species. The overarching objectives are:</p> <ul style="list-style-type: none"> <li>▪ Promote, co-operate in and support research relating to migratory species.</li> <li>▪ Endeavour to provide immediate protection for migratory species included in Appendix I.</li> <li>▪ Endeavour to conclude Agreements covering the conservation and management of migratory species included in Appendix II.</li> </ul>		
<p><b>Directive on the Conservation of European Wild Birds (79/406/EEC)</b></p> <p>This Directive relates to the conservation of all species of naturally occurring birds in the wild state in the European territory of the Member States to which the Treaty applies, including the designation of certain habitats as Special Protection Areas. It covers the protection, management and control of these species and lays down rules for their exploitation, and also the prevention of pollution / deterioration of habitats or any disturbances affecting the birds. The main provisions are the maintenance of favourable conservation status of all wild bird species, the identification and classification of Special Protection Areas for rare/vulnerable species and the establishment of schemes for the protection of wild birds.</p>	<p>Member States are required to define Special Protection Areas for rare or vulnerable species listed in the Directive. There are no specific targets or indicators of relevance.</p> <p><b>SA Objective: Biodiversity</b></p>	<p>The Lambeth CS should seek to avoid significant adverse impacts on wild birds and their vulnerable habitats including SPAs.</p>
<p><b>Directive on the Conservation of European Wildlife and of Wild Fauna and Flora (92/43/EEC)</b></p> <p>The objective of the Directive is to contribute towards ensuring the conservation of natural habitats and of wild fauna and flora within the European Community.</p>	<p>The target for Member States is to take measures to maintain or restore at favourable conservation status, natural habitats and species of Community importance. This includes Special Areas of Conservation, Special Protection Areas and it is usually accepted as also including Ramsar sites. These are known as European Sites.</p>	<p>The SA should include objectives that address issues such as protection of biodiversity and habitats. The Lambeth CS should have regard to the objectives of the Directive and the strength of protection given to European Designated Sites.</p> <p><b>SA Objective: Biodiversity, Water quality and resources</b></p>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<b>EU Biodiversity Strategy (European Commission, 1998)</b>	are required to take account of economic, social and cultural requirements and regional and local characteristics. Plans that may adversely affect the integrity of European Sites may be required to be subject to Appropriate Assessment under the Directive.	The strategy aims to anticipate, prevent and attack the causes of significant reduction or loss of biodiversity at the source, which will help both to reverse present trends in biodiversity decline and to place species and ecosystems, including agro-ecosystems, at a satisfactory conservation status, both within and beyond the territory of the EU.
<b>UN Convention on Biological Diversity (United Nations, 1992)</b>	There are no specific targets or indicators of relevance.	This convention was agreed among the vast majority of the world's governments and sets out their commitments to maintaining the world's biodiversity so to achieve a more sustainable economic development. The achievement of the objectives in the Convention relies heavily upon the implementation of action at the national level.
<b>Directive on the Assessment and Management of Flood Risks (2007/60/EC)</b>	Key articles refer to the need to:	This Directive requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. This Directive also reinforces the rights of the public to access this information and to have a say in the planning process. The purpose of the Directive is to establish a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods in the Community.
	<b>SA Objective: Biodiversity</b>	The SA should assess the impact that the Lambeth CS could have on biodiversity and habitats. The Lambeth CS should carefully consider the location of known potential sites and consider other effects which could impact upon biodiversity.
	<b>SA Objective: Biodiversity</b>	The protection of biodiversity sources should be a key theme of the SA and the SA should assess the impact that the Lambeth Core Strategy could have on biodiversity and ecosystems.
	<b>SA Objective: Biodiversity</b>	The SA should include an objective on reducing flood risk in the north of the Borough. The Lambeth Core Strategy could be a key development in the flood management plans of London and the Thames Estuary.
	<b>SA Objective: Water quality and resources</b>	Key articles refer to the need to:

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<b>European Landscape Convention (European Commission, 2000)</b>  The aims of the European Landscape Convention are to promote European landscape protection, management and planning, and to organise European co-operation on landscape issues. The Convention is part of the Council of Europe's work on natural and cultural heritage, spatial planning, environment and local self government, and establishes the general legal principles which should serve as a basis for adopting national landscape policies and establishing international co-operation in such matters.	There are no specific indicators and targets of relevance.	The SA framework should include objectives that relate to townscape protection, and information should be gathered about the location of areas of high townscape quality.  <b>SA Objective: Built and historic environment</b>
<b>Aarhus Convention (Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters) (1998)</b>  The Convention addresses the need to guarantee the rights of access to information, public participation in decision-making and access to justice in environmental matters. There is a requirement for these provisions to be implemented in the Member States.	There are no specific objectives, targets or indicators of relevance.	The SA process has to comply with the principles of the Convention. Enough time needs to be provided for in the SA process to permit consultation in accordance with Aarhus requirements. The Lambeth CS will also be subject to public consultation.  <b>SA Objective: Access and Services</b>
<b>EU European Employment Strategy (European Commission, 2005)</b>  The EES is a five year rolling programme based on five key principles: <ul style="list-style-type: none"><li>• Subsidiarity (balance between European Union level and the Member States)</li><li>• Convergence (concerted action)</li><li>• Mutual learning (exchanging of good practice)</li><li>• Integrated approach (structural reforms also extend to social, educational, tax, enterprise and regional policies)</li><li>• Management by objectives.</li></ul>	Strategic goals to 2010: <ul style="list-style-type: none"><li>• To become the most competitive and dynamic knowledge-based economy in the world, capable of sustainable economic growth with more and better jobs and greater social cohesion;</li><li>• To regain the conditions for full employment and to strengthen cohesion by 2010;</li><li>• To raise the overall EU employment rate to 70%; and</li><li>• To increase the number of women in employment from an average to more than 60% by 2010.</li></ul>	The Lambeth CS should promote economic growth and development in Lambeth and the SA should assess how the CS may impact (both positively and negatively) on economic activity.  <b>SA Objectives: Local economy; Employment</b>

**European Transport Policy for 2010: A Time to Decide (European Commission, 2001)**

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
The policy outlines the need to improve the quality and effectiveness of transport in Europe. A strategy has been proposed which is designed to gradually break the link between transport growth and economic growth to reduce environmental impacts and congestion. The policy advocates measures that promote an environmentally friendly mix of transport services.	There are no specific indicators or targets of relevance.	<p>The SA framework should include objectives which address the need to reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.</p> <p>The baseline data collation process should also identify the main strategic transport links including roads, railway stations, airports and ports.</p>
		<b>SA Objective: Transport and Travel</b>
		<b>The European Spatial Development Perspective (ESDP) (European Commission, 1999)</b>
	<p>The document includes a series of principles that should be used as guidelines when considering initiatives for the spatial development of Europe. Policies and decisions especially economic ones with implications for spatial development, concerning mainly human settlements, agriculture, transport, energy, tourism and industry must not have negative impacts on sustainable development and its objectives. To achieve this, and before making such decisions with spatial implications, it will be necessary to undertake SEAs on long term ecological effects and to monitor ecological changes with appropriate indicators.</p>	<p>There are no specific objectives, targets or indicators of relevance.</p> <p>The SA should include objectives that complement the principles of the ESDP. This would include the topics of ecology, flooding, land erosion, soil, water and air contamination, geomorphology, landscape, culture and the interactions between all of these topics and indirect effects on climate change. It is also important to use the precautionary principle when undertaking the assessment.</p>
		<b>Relevant to various SA objectives</b>
		<b>The European Environment and Health Action Plan 2004 – 2010 (European Commission, 2004)</b>
	<p>The action plan is designed to give the EU scientifically grounded information needed to help EU member States to reduce the adverse health impacts of certain environmental factors and to endorse better co-operation between actors in the environment, health and research fields.</p>	<p>There are no specific targets or indicators of relevance.</p> <p>The SA framework should include an objective addressing the need to protect human health. The potential effects of the Lambeth CS on health may include access to better health care services and reduction of the causes of ill health.</p>
		<b>SA Objectives: Health and well being; Access and services</b>
	<b>Together for Health: A Strategic Approach for the EU 2008 – 2013 (European Commission, 2007)</b>	<p>The document acknowledges that health policy at the community level should foster good</p> <p>The SA framework should include an objective addressing the need to protect</p>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<p>across the EU and health in all policies. The strategy is based around the following principles:</p> <ul style="list-style-type: none"> <li>• A strategy based on shared health values</li> <li>• Health is the greatest wealth</li> <li>• Health in all policies</li> <li>• Strengthening the EU's voice in global health</li> </ul>	<p>health, protect citizens from threats and support sustainability. To meet these challenges the strategy identifies three objectives as key areas for the future years.</p> <ul style="list-style-type: none"> <li>• Objective 1 – Fostering good health in an ageing Europe</li> <li>• Objective 2 – Protecting citizens from health threats</li> <li>• Objective 3 – Supporting dynamic health systems and new technologies</li> </ul>	<p>human health. The potential effects of the Lambeth CS on health may include access to better health care services and reduction of the causes of ill health.</p> <p><b>SA Objectives: Health and well being; Access and services</b></p>
<b>UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), The Athens Charter (1931) and The Venice Charter on the Conservation and Restoration of Monuments and Sites (1964)</b>		
<p>These charters and convention aims to protect and enhance the world's cultural heritage.</p> <p>In terms of the UNESCO convention, each Party to the Convention recognizes the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage; and will ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage situated on its territory.</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<p>The Lambeth CS could impact upon heritage through the designation of sites either as areas of significance terms of archaeology or heritage, or for development. It will be important that the SA assess the potential impact of the Lambeth CS on heritage features.</p> <p><b>SA Objective: Built and historic environment</b></p>
<b>The Charter for the Conservation of Historic Towns and Urban Areas (International Council on Monuments and Sites, 1987)</b>		
<p>The Charter concerns historic urban areas including cities, towns and historic centres or quarters, together with their natural and man-made environments. In order to be most effective, the conservation of historic towns and other historic urban areas should be an integral part of coherent policies of economic and social development and of urban and regional planning at every level.</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<p>It is important that any development arising from the Lambeth CS is sensitive in terms of conservation of (especially historic) towns.</p> <p><b>SA Objective: Built and historic environment</b></p>
<b>Adapting to Climate Change in Europe - Options for EU Action – (European Commission, 2007)</b>		
<p>This EC Green Paper is a consultation document that sets out how Europe should respond and adapt to the changing climate. The Green Paper considers response based around four pillars:</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<p>The SA should assess the implications of the Lambeth CS on climate change emissions, particularly in relation to the reduction of greenhouse gases and the implementation of</p>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<ul style="list-style-type: none"> <li>• Early action in the EU</li> <li>• Integrating adaptation into EU external actions</li> <li>• Reducing uncertainty by expanding the knowledge base through integrated climate research</li> <li>• Involving European society, business and public sector in the preparation of coordinated and comprehensive adaptation strategies.</li> </ul>		<p>adaptation methods.</p> <p><b>SA Objective: Climate change and energy</b></p>
<b>Energy for the Future: Renewable Sources of Energy - White Paper for a Community Strategy and Action Plan (European Commission, 1997)</b>		<p>The SA should assess the implications of the Lambeth CS on the UK's renewable energy targets. However, it should be remembered that this objective should be assessed in association with energy efficiency and the minimisation of energy consumption. It is not appropriate to maximise the energy output of a scheme without reference to other constraints.</p> <p><b>SA Objective: Climate change and energy</b></p>
<b>Directive to Promote Electricity from Renewable Energy (2001/77/EC)</b>	<p><u>Target</u></p> <ul style="list-style-type: none"> <li>• To double the share of renewable energies in gross domestic energy consumption in the European Union by 2010 (from the present 6% to 12%).</li> </ul>	<p>The SA should assess the implications of the Lambeth CS on the UK's renewable energy targets. However, it should be remembered that this objective should be assessed in association with energy efficiency and the minimisation of energy consumption. It is not appropriate to maximise the energy output of a scheme without reference to other constraints.</p> <p><b>SA Objective: Climate change and energy</b></p>
<b>Kyoto Protocol to the UN Framework Convention on Climate Change (United Nations, 1992) and UN Framework Convention on Climate Change (United Nations, 2007)</b>		<p>The Kyoto Protocol agreed in 1997 was designed Developed countries agreed to reduce their The SA should assess the implications of the</p>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<p>to address the fact that greater cuts in emissions were needed to prevent serious interference with the climate. It has been ratified by over 166 countries. It sets legally binding emissions reductions targets on the developed countries that have ratified it (including the UK). In December 2007, the United Nations Framework Convention on Climate Change took place and brought together over 180 countries. Under the 2007 convention governments have to:</p> <ul style="list-style-type: none"> <li>• Gather and share information on greenhouse gas emissions</li> <li>• Launch national strategies for climate change</li> <li>• Co-operate in preparing for adaptation to the impacts of climate change.</li> </ul>	<p>collective emissions of greenhouse gases by 5.2% from 1990 levels by the period 2008 to 2012. The UK target is to reduce emissions to 12.5% below 1990 levels by 2012 (note that the UK has imposed further targets upon itself since then).</p>	<p>Lambeth CS on climate change emissions.</p> <p><b>SA Objective: Climate change and energy</b></p>
<p>The conference resulted in the adoption of the Bali Roadmap which consists of a number of forward-looking decisions that represent the various tracks that are essential to reaching a secure climate change future. Included in the Roadmap is the Bali Action Plan which charts the course for negotiating a new process designed to tackle climate change with the aim of completing this by 2009.</p>	<p>The second phase of the European Climate Change Programme (ECCP II) was launched on 24 October 2005. The ECCP II consists of several working groups:</p> <ul style="list-style-type: none"> <li>• ECCP I review (with 5 subgroups: transport, energy supply, energy demand, non-CO<sub>2</sub> gases, agriculture) <ul style="list-style-type: none"> <li>• Aviation</li> <li>• CO<sub>2</sub> and cars</li> <li>• Carbon capture and storage</li> <li>• Adaptation</li> <li>• EU Emission Trading Scheme review</li> </ul> </li> </ul>	<p>The SA should assess the implications of the Lambeth CS on climate change emissions, particularly in relation to the reduction of greenhouse gases and the implementation of adaptation methods.</p> <p><b>SA Objective: Climate change and energy</b></p>
		<p><b>Waste to Landfill Directive 99/31/EC</b></p>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
The objective of the Directive is to prevent or reduce as far as possible negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements for waste and landfills.	Targets The directive also establishes guidelines and targets for the quantity of biodegradable waste being sent to landfill which are legally binding. These include: <ul style="list-style-type: none"><li>• No later than 2006, biodegradable municipal waste going to landfills must be reduced to 75% of the total amount (by weight) of biodegradable municipal waste produced in 1995</li><li>• By 2010 biodegradable municipal waste going to landfills must be reduced to 50%</li><li>• By 2015 biodegradable municipal waste going to landfills must be reduced to 35%</li></ul>	The SA should include an objective relating to the minimisation of the production of waste and increasing re-use, recycling, remanufacturing and recovery rates. <b>SA Objective: Waste</b>
<b>EU Waste Framework Directive (91/156/EEC)</b>	The WFD requires Member States of the EU to establish both a network of disposal facilities and competent authorities with responsibility for issuing waste management authorisations and licenses.	Article 4: Member States shall take the necessary measures to ensure that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment, and in particular: <ul style="list-style-type: none"><li>• Without risk to water, air, soil and plants and animals;</li><li>• Without causing a nuisance through noise or odours; and without adversely affecting the countryside or places of special interest.</li></ul>
<b>Directive on Waste (2006/12/EC)</b>	The Directive establishes a framework for the management of waste across the European Community. It requires Member States to <ul style="list-style-type: none"><li>• Give priority to waste prevention and encourage re-use and recovery of waste</li><li>• Establish an integrated network of disposal installations</li><li>• Prepare waste management plans</li><li>• Ensure that waste is recovered or disposed of without endangering human health.</li></ul>	The SA should include an objective relating to the minimisation of the production of waste and increasing re-use, recycling, remanufacturing and recovery rates. <b>SA Objective: Waste</b>
<b>Hazardous Waste Directive 91/689/EEC</b>	There are no specific targets or indicators of relevance.	The SA should include an objective relating to the minimisation of the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
The Directive sets the framework for the management of hazardous waste arisings. The aim is to ensure the correct and proper management of hazardous waste. A definition of hazardous waste is also provided.	There are no specific targets or indicators of relevance.	The directive has no direct influence over the Lambeth CS.  <b>SA Objective: Waste</b>
<b>EU Thematic Strategy on Soil (European Commission, 2006)</b>	There are no specific targets or indicators of relevance.	The SA framework should include an objective addressing the protection of the soil resource (this is also one of the SEA Directive topics)  <b>SA Objective: Soil and natural resources</b>
The thematic strategy calls for a framework directive and hence advocates higher levels of protection to the soil resource. Eight main threats to soil are identified which are:  <ul style="list-style-type: none"> <li>• Erosion</li> <li>• Organic matter decline</li> <li>• Contamination</li> <li>• Salinisation</li> <li>• Compaction</li> <li>• Soil biodiversity loss</li> <li>• Sealing</li> <li>• Landslides and flooding</li> </ul>		
<b>Air Quality Framework Directives (96/62/EC) and Daughter Directives (1999/30/EC), (2000/69/EC), (2002/3/EC), (2004/107/EC)</b>	Thresholds for pollutants are included in the Directives. The list of atmospheric pollutants includes sulphur dioxide, nitrogen dioxide, particulate matter, lead, ozone, benzene, carbon monoxide, poly-aromatic hydrocarbons, cadmium, arsenic, nickel and mercury.	The SA framework should include an objective that addresses the improvement of air quality.  <b>SA Objectives: Air Quality, Climate change and energy</b>
The Framework Directive establishes a framework under which the EC will agree air quality limit values or guide values for specified pollutants in a series of Daughter Directives. The Directives contain limit values relating to the pollutants and it is necessary for these targets to be translated into UK legislation.	Following on from the work carried out under the CAFE Programme, the Commission has fixed targets for reducing certain pollutants (SO <sub>2</sub> , NO <sub>x</sub> , VOCs, ammonia and PM2.5) and is strengthening the legislative framework for combating air pollution in two ways, firstly by improving Community environmental legislation and, secondly, by taking account of concerns about air quality in related policies.	The SA framework should include objectives that address the protection of air quality. The development of renewable power generation has the potential to contribute to a reduction in certain air emissions by reducing the reliance on other energy facilities which might typically contribute to adverse air quality.  <b>SA Objectives: Air Quality, Climate change and energy</b>

<b>Key objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<b>Directive on Environmental Noise (2002/49/EC)</b>  The aim of the Directive is to define a common approach intended to avoid, prevent or reduce the harmful effects including annoyance due to exposure to environmental noise. Each Member State should determine exposure to environmental noise through noise mapping, ensure that information on environmental noise and its effects is made available to the public and to adopt action plans based upon noise mapping results with a view to preventing and reducing environmental noise where necessary and particularly where exposure effects could induce harmful effects on human health.	There are no specific objectives, targets or indicators of relevance.	The SA should assess the effects of the plan on noise including from disturbance to local populations and also wildlife.  <b>SA Objective: Noise and air pollution</b>
<b>Directive on Integrated Pollution Prevention and Control (96/61/EC)</b>  The Directive provides an integrated approach to pollution prevention. It seeks to ensure a high level of protection to the environment through measures to prevent or reduce emissions to air, water and land. It addresses issues relating to waste, wastewater, energy use and environmental accidents. The Directive is based upon several principles including best available techniques.	There are no specific objectives, targets or indicators of relevance.	The principles of environmental protection are of direct relevance to the SA and the Lambeth Core Strategy. The SA framework should include a number of objectives addressing environmental protection in particular recognising the need to prevent pollution to air, land and water.  <b>SA Objectives: Built and historic environment; Biodiversity; Water quality and resources; Air quality</b>

**Table A2 – UK Plans, Programmes and Environmental Protection Objectives**

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<b>Planning for a Sustainable Future: White Paper (Department of Communities and Local Government, 2007)</b>  This White Paper sets out detailed proposals for reform of the planning system. The vision is for a planning system which supports vibrant, healthy	There are no specific targets or indicators of relevance.	The principles of the planning reform will have to be considered during the development of the Lambeth CS.

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>		
sustainable communities, promotes the UK's international competitiveness, and enables the infrastructure which is vital to our quality of life to be provided, in a way that is integrated with the delivery of other sustainable development objectives, and ensures that local communities and members of the public can make their views heard.	It proposes reforms on how decisions are taken on nationally significant infrastructure projects including energy, waste, waste-water and transport, responding to the challenges of economic globalisation and climate change.	SA objectives should be developed which will enable a full and comprehensive assessment of the potential strategic environmental effects of the Lambeth CS.  <b>Relevant to various SA objectives</b>		
	<b>Planning Bill (UK Government, 2007)</b>	The Planning Bill was introduced in November 2007 and builds upon the 2007 Planning White Paper. The Bill introduces a new system for approving major infrastructure of national importance including energy developments. The objective is to streamline decisions and avoid long public inquiries. Decisions for major infrastructure projects would be undertaken by a new Infrastructure Planning Commission and would be based on new National Policy Statements. The Bill states that for National Policy statements an appraisal of sustainability must be carried out.	There are no specific targets or indicators of relevance.  There is still uncertainty regarding the Planning Bill reforms and hence the development of the Lambeth CS will need to take account of any amendments to the Planning Bill. The SA is being undertaken in tandem with the development of the Lambeth CS.  <b>Relevant to various SA objectives</b>	The SA should include objectives that complement the priorities and principles of this Strategy.  <b>Relevant to various SA objectives</b>

**UK Government Sustainable Development Strategy: Securing the Future (UK Government, 2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (UK Government and Devolved Administrations, 2005)**

The strategy for sustainable development aims to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. As a result of the 2004 consultation to develop new UK sustainable development strategy, the following issues have been highlighted as the main priority areas for immediate action:

- Sustainable consumption and production –
- Greenhouse gas emissions: Kyoto target

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<ul style="list-style-type: none"> <li>• working towards achieving more with less</li> <li>• Climate change and energy - confronting the greatest threat</li> <li>• Natural resource protection and environmental enhancement - protecting the natural resources on which we depend</li> <li>• From local to global - building sustainable communities</li> <li>• Creating places where people want to live and work, now and in the future</li> </ul> <p>The following principles will be used to achieve the sustainable development purpose, and have been agreed by the UK Government, Scottish Executive, Welsh Assembly Government, and the Northern Ireland Administration:</p> <ul style="list-style-type: none"> <li>• Living within environmental limits</li> <li>• Ensuring a strong, healthy, and just society</li> <li>• Achieving a sustainable economy</li> <li>• Promoting good governance</li> <li>• Using sound science responsibly</li> </ul>	<ul style="list-style-type: none"> <li>▪ and CO2 emissions</li> <li>▪ CO2 emissions by end user: industry, domestic, transport (excluding international aviation), other</li> <li>▪ Renewable electricity: renewable electricity generated as a percentage of total electricity</li> <li>▪ Energy supply: UK primary energy supply and gross inland energy consumption</li> <li>▪ Water resource use: total abstractions from non-tidal surface and ground water sources</li> <li>▪ Waste: arisings by (a) sector (b) method of disposal</li> <li>▪ Bird populations: bird population indices (a) farmland birds (b) woodland birds (c) birds of coasts and estuaries (d) wintering wetland birds</li> <li>▪ Biodiversity conservation: (a) priority species status (b) priority habitat status</li> <li>▪ River quality: rivers of good (a) biological (b) chemical quality</li> <li>▪ Air quality and health: (a) annual levels of particles and ozone (b) days when air pollution is moderate or higher</li> </ul>	<p><b>UK Forestry Standard: The Governments Approach to Sustainable Forestry (Forestry Commission, 2004)</b></p> <p>The purpose of the strategy is to set standards for the sustainable management of all forests and woodlands in the UK. The standard is linked to developing international protocols for sustainable forestry. It is used in the UK for the development of forest monitoring and is the basis from which</p> <p>There are no specific objectives, targets or indicators of relevance.</p> <p>The plan has no direct influence over the Lambeth CS.</p>

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<p><b>Conserving Biodiversity – The UK Approach (Department for the Environment, Food and Rural Communities, 2007)</b></p> <p>The purpose of the document is to set out the vision and approach to conserving biodiversity within the UK's devolved framework. It sets out an approach to biodiversity conservation that is designed to meet the commitment to halt the loss of biodiversity by 2010 but also to guide action into the second decade of the 21st century. The statement emphasises an ecosystem approach.</p>	<p>In June 2007 the UK Biodiversity Partnership published 18 indicators that can be used to monitor biodiversity progress across the UK. They will be used as part of a wider evidence base to determine whether the target to halt biodiversity loss is being achieved. The indicators are listed below:</p> <ul style="list-style-type: none"> <li>▪ Trends in populations of selected species (birds)</li> <li>▪ Trends in populations of selected species (butterflies)</li> <li>▪ Plant diversity</li> <li>▪ UK BAP Priority Species</li> <li>▪ UK BAP Priority Habitats</li> <li>▪ Genetic diversity</li> <li>▪ Protected areas</li> <li>▪ Sustainable woodland management</li> <li>▪ Area of agri-environment land</li> <li>▪ Sustainable fisheries</li> <li>▪ Ecological impact of air pollution</li> <li>▪ Invasive species</li> <li>▪ Spring Index</li> <li>▪ Marine trophic index</li> <li>▪ Habitat connectivity</li> <li>▪ River quality</li> <li>▪ Expenditure on UK biodiversity</li> <li>▪ Expenditure on global biodiversity</li> <li>▪ Conservation volunteering.</li> </ul>	<p>The protection of biodiversity should be an important theme of the SA and SA objectives relating to the protection of biodiversity resources should be included. Information about designated sites and nature conservation should be obtained through the baseline review.</p> <p><b>SA Objective: Biodiversity; Water quality and resources</b></p>
<p><b>UK Biodiversity Action Plan (Various Partners, 1994)</b></p> <p>This Plan has been prepared in response to Article 6 of the Biodiversity Convention, to develop national strategies for the conservation of biological diversity and the sustainable use of biological resources. The Action Plan is monitored, reviewed and updated when required. The overall goal of the UKBAP is 'To conserve and enhance</p>	<p>The plan contains 391 action plans for 381 priority species and 10 priority species-groups. Individual plans have been developed for 45 priority habitats. Specific targets are established for each of these action plans which are considered too detailed for this PPP review.</p>	<p>The protection of biodiversity should be an important theme of the SA and SA objectives relating to the protection of biodiversity resources should be included. Information about designated sites and nature conservation should be obtained through the baseline review.</p>

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<p>biological diversity within the UK and to contribute to the conservation of global biodiversity through all appropriate mechanisms'. Its underlying principles are:</p> <ul style="list-style-type: none"> <li>▪ Where biological resources are used, such use should be sustainable</li> <li>▪ Wise use should be ensured for non-renewable resources</li> <li>▪ The conservation of biodiversity requires the care and involvement of individuals and communities as well as Governmental processes</li> <li>▪ Conservation of biodiversity should be an integral part of Government programmes, policy and action</li> <li>▪ Conservation practice and policy should be based upon a sound knowledge base</li> <li>▪ The precautionary principle should guide decisions</li> </ul>	<p><b>SA Objective: Biodiversity; Water quality and resources</b></p>	
<p><b>Countryside and Rights of Way Act (CROW) (Office of the Deputy Prime Minister, 2000)</b></p> <p>CROW extends the public's ability to enjoy the countryside whilst also providing safeguards for landowners and occupiers. It creates a new statutory right of access to open country and registered common land, modernising the rights of way system, give greater protection to Sites of Special Scientific Interest (SSSIs), provide better management arrangements for Areas of Outstanding Natural Beauty (AONBs), and strengthen wildlife enforcement legislation. Emphasises the public's right of access to open country and common land, and gives additional protection to SSSI.</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<p>The promotion of rights of way and access routes should be an important theme of the SA and SA objectives relating to rights of way and access should be included.</p> <p><b>SA Objectives: Access and services; Health and well being; Liveability and place</b></p>
<p><b>Natural Environment and Rural Communities Act (UK Government, 2006)</b></p> <p>The act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering government policy. The act created a new integrated agency called</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<p>The SA should include objectives on the protection of biodiversity and on bringing nature closer to people.</p> <p><b>SA Objectives: Biodiversity;</b></p>

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Natural England, to act as a champion for the natural environment.		<b>Regeneration and efficient use of land</b>
<b>Government Urban White Paper: Our Towns and Cities: the Future - Delivering an Urban Renaissance (Department for the Environment, Transport and the Regions, 2000)</b>	<p>This White Paper explains how our towns and cities can function as economic powerhouses, helping to achieve the Government's core objective of increasing sustainable growth and employment for all and bringing benefits not just to their own population but to the surrounding region. It also targets those areas that are striving to renew their economic identity and which are seeking to take full advantage of the rapid growth in the new industries.</p>	<p>The central purpose of the paper is to arrest urban decline and it starts with a recognition of an holistic approach to policy ("joined up thinking") which recognises the need to link together a range of initiatives on housing, planning, education, transport and law and order issues.</p> <p><b>SA Objective: Regeneration and efficient use of land</b></p>
<b>Government Rural White Paper: Our Countryside - the Future - a Fair Deal for Rural England (Department for the Environment, Transport and the Regions, 2000)</b>	<p>Outlines the government's vision of a living, working, protected and vibrant countryside. The paper sets out 10 key actions which are intended to meet the vision:</p> <ul style="list-style-type: none"> <li>• Support vital village services</li> <li>• Modernise rural services</li> <li>• Provide affordable homes</li> <li>• Deliver local transport solutions</li> <li>• Rejuvenate market towns and a thriving rural economy</li> <li>• Set a new direction for farming</li> <li>• Preserve what makes rural England special</li> <li>• Ensure everyone can enjoy an accessible countryside</li> <li>• Give local power to country towns and villages</li> <li>• Think rural</li> </ul>	<p><b>Objectives</b></p> <p>The Paper lists the Government's rural policy objectives:</p> <ul style="list-style-type: none"> <li>• Objective 1: To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.</li> <li>• Objective 2: To maintain and stimulate communities, and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.</li> <li>• Objective 3: To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).</li> <li>• Objective 4: To increase opportunities for people to get enjoyment from the countryside. To open up public access to mountain, moor, heath and down and registered common land by the end of 2005.</li> <li>• Objective 5: To promote government</li> </ul> <p><b>SA Objective: Biodiversity, Water quality and resources</b></p>

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<b>Rural Strategy (Department for the Environment, Food and Rural Affairs, 2004)</b>	<p>Although the Rural White Paper (2000) vision still remains at the heart of rural policy, much has been achieved and many lessons have been learnt since, and as a result new challenges facing rural areas have been identified. To meet these challenges a new Government approach was needed, which is set out in this Strategy. The Strategy identifies three key priorities for rural policy:</p> <ul style="list-style-type: none"> <li>• Economic and Social Regeneration – supporting enterprise across rural England, but targeting greater resources at areas of greatest need.</li> <li>• Social Justice for All – tackling rural social exclusion wherever it occurs and providing fair access to services and opportunities for all rural people.</li> <li>• Enhancing the Value of our Countryside – protecting the natural environment for this and future generations.</li> </ul>	<p>There are no specific targets or indicators of relevance.</p> <p>The SA should include objectives that address issues such as protection of biodiversity and habitats. The Lambeth CS should have regard to the objectives of the Directive and the strength of protection given to European Designated Sites.</p> <p><b>SA Objective: Biodiversity, Water quality and resources</b></p>
<b>Good Practice Guide on Planning for Tourism (Department of Communities and Local Government, 2007)</b>	<p>This document replaces PPG21 on tourism. It aims to:</p> <ul style="list-style-type: none"> <li>• Ensure that planners understand the importance of tourism and take this fully into account when preparing development plans and taking planning decisions.</li> <li>• Ensure that those involved in the tourism industry understand the principles of national planning policy as they apply to tourism and how these can be applied when preparing individual planning applications.</li> <li>• Ensure that planners and the tourism industry</li> </ul>	<p>There are no specific objectives, targets or indicators of relevance.</p> <p>The SA should address potential impacts on the built and historic environment and should seek to protect it from such impacts. The quality of the built and historic environment has a major impact upon the tourist industry.</p> <p><b>SA Objective: Built and historic environment</b></p>

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work together effectively to facilitate, promote and deliver new tourism development in a sustainable way.		
<b>UK Fuel Poverty Strategy (Department for Business, Enterprise and Regulatory Reform, 2001)</b>		
The strategy identifies the main causes of fuel poverty in the UK (a combination of poor energy efficiency in homes and low incomes) and outlines its effects on quality of life and health. The strategy aims to reduce fuel poverty especially of vulnerable members of society, such as children and the elderly.	There are no specific objectives, targets or indicators of relevance.	The SA should assess the implications of the Lambeth CS on the UK's renewable energy targets. It should also aim to minimise energy consumption, increase energy efficiency and the use of renewable energy.  <b>SA Objective: Climate change and energy</b>
<b>10 Year Transport Plan (Department for Transport, 2000)</b>		
Transport 2010 is the long-term strategy for delivering a quicker, safer, more punctual and environmentally friendly transport system. The goal is to transform the transport system over the next 10 years, tackling congestion and pollution, increasing choice and raising standards to make travel safer, more attractive and accessible to all.	The document makes reference to Public Service Agreement targets: <ul style="list-style-type: none"><li>• To improve air quality by meeting our Air Quality Strategy targets for carbon monoxide, lead, nitrogen dioxide, particles, sulphur dioxide, benzene and 1,3 butadiene</li><li>• To reduce greenhouse gas emissions by 12.5% from 1990 levels, and move towards a 20% reduction in carbon dioxide emissions by 2010</li></ul>	The SA framework should include objectives which address the need to protect the efficiency of the transport system and also aim to reduce the need to travel. The baseline data collation process should also identify the main strategic transport links including roads, railway stations, airports and ports.  <b>SA Objective: Transport and travel; Air quality</b>
<b>The Future of Transport White Paper – A Network for 2030 (Department for Transport, 2004)</b>		
This White Paper builds on the progress that has already been made since the implementation of the 10 Year Plan for transport, and sets out the vision for transport for the next 30 years. It is a long-term strategy for a modern, efficient and sustainable transport system backed up by sustained high levels of investment. The aim is for a transport network that can meet the challenges of a growing economy and the increasing demand for travel, but that can also achieve environmental objectives.	The document indicates a number of Public Service Agreement objectives. Those of relevance include: <ul style="list-style-type: none"><li>• Reduce greenhouse gas emissions to 12.5% below 1990 levels in line with our Kyoto commitment and move below 1990 levels by 2010, through measures including energy efficiency and renewables.</li><li>• Improve air quality by meeting the Air Quality Strategy targets for carbon monoxide, lead, nitrogen dioxide, particles, sulphur dioxide, benzene and 1,3 butadiene.</li></ul>	The SA framework should include objectives which address the need to protect the efficiency of the transport system and also aim to reduce the need to travel. The baseline data collation process should also identify the main strategic transport links including roads, railway stations, airports and ports.  <b>SA Objective: Transport and travel; Air quality</b>

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<b>Heritage Protection Review White Paper (Department for Culture, Media and Sport, 2007)</b>	<p>This is a white paper for England and Wales with some UK-wide elements. The paper sets out a vision of a unified and simpler heritage protection system which will have more opportunities for public involvement and community engagement.</p> <ul style="list-style-type: none"> <li>• Maximising opportunities for inclusion and involvement</li> <li>• Supporting sustainable communities by putting the historic environment at the heart of an effective planning system</li> </ul>	<p>The proposals in the document are based on three core principles:</p> <ul style="list-style-type: none"> <li>• The need to develop a unified approach to the historic environment</li> <li>• Maximising opportunities for inclusion and involvement</li> <li>• Supporting sustainable communities by putting the historic environment at the heart of an effective planning system</li> </ul> <p><b>SA Objective: Built and historic environment</b></p>
<b>Climate Change – The UK Programme 2006: Tomorrow's Climate Today's Challenge</b>	<p>This programme contains further commitments to help to achieve the national goal of reducing carbon dioxide by 20% below 1990 levels by 2010 and, in the long-term, reduce emissions by 60 per cent by 2050. The Programme therefore sets out the Strategy for both international and national action and is based on a number of principles:</p> <ul style="list-style-type: none"> <li>▪ The need to take a balanced approach with all sectors and all parts of the UK playing their part</li> <li>▪ The need to safeguard, and where possible enhance, the UK's competitiveness, encourage technological innovation, promote social inclusion and reduce harm to health</li> <li>▪ The need to focus on flexible and cost effective policy options which will work together to form an integrated package</li> <li>▪ The need to take a long-term view and considering the need for the UK to adapt to the impacts of climate change</li> <li>▪ The need for the Programme to be kept under review.</li> </ul>	<p>The document outlines that the national goal is to reduce carbon dioxide emissions by some 60% by 2050.</p> <p>The Lambeth CS should help the UK to reach its carbon targets.</p> <p><b>SA Objective: Climate change and energy</b></p>
<b>UK Climate Change Bill (Department for Environment, Food and Rural Affairs, 2007)</b>	<p>The UK Government is committed to addressing the causes and the consequences of climate change and has introduced a Climate Change Bill. The Bill will establish a new approach to</p>	<p>The Government has a target to reduce the UK's carbon dioxide emissions by at least 60% by 2050.</p> <p>The SA should assess the implications of the Lambeth CS on the UK's renewable energy targets. It should also aim to minimise energy consumption, increase energy</p>

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managing and responding to climate change in the UK by setting ambitious targets, taking powers to achieve them, strengthening the institutional framework, enhancing the UK's ability to adapt to the risks posed by climate change and to establish accountability to the UK.	The Government announced in February 2008 that a review of this target will be a statutory duty under the Climate Change Bill. Other amendments have been proposed by the Government to strengthen compliance with the target and increase accountability and transparency.	efficiency and the use of renewable energy. An important objective of the Lambeth CS should be that embedded carbon inherent in the building and running of any development should be minimised.
<b>Stern Review of the Economics of Climate Change (HM Treasury and the Cabinet Office, 2006)</b>	<b>SA Objective: Climate change and energy</b>	
The review examines the evidence on the economic impacts of climate change and explores the economics of stabilizing greenhouse gases in the atmosphere. The second part of the review considers the complex policy challenges involved in managing the transition to a low-carbon economy and in ensuring that societies are able to adapt to the consequences of climate change. The document clearly identifies that adaptation is the only available response for impacts that will occur over the next few decades.	There are no specific targets or indicators of relevance.	The SA should assess the implications of the Lambeth CS on climate change emissions and seek to reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.
<b>Energy White Paper: Meeting the Energy Challenge (Department for Business, Enterprise and Regulatory Reform, 2007)</b>	<b>SA Objective: Climate change and energy</b>	
This White Paper sets out a framework for action to address the following long-term energy challenges, and helps to manage the risks of:	The government sets out four energy policy goals:	The SA framework should include an objective relating to the reduction of greenhouse gas emissions. An important objective of the Lambeth CS should be that embedded carbon inherent in the building and running of any scheme should be minimised.
<ul style="list-style-type: none"> <li>▪ Tackling climate change by reducing carbon dioxide emissions both within the UK and abroad</li> <li>▪ Ensuring secure, clean and affordable energy as we become increasingly dependent on imported fuel</li> </ul>	<ul style="list-style-type: none"> <li>• To put ourselves on a path to cutting CO<sub>2</sub> emissions by some 60% by about 2050, with real progress by 2020.</li> <li>• To maintain the reliability of energy supplies.</li> <li>• To promote competitive markets in the UK and beyond.</li> <li>• To ensure that every home is adequately and affordably heated.</li> </ul>	
<b>UK Renewable Energy Strategy Consultation (Department for Business, Enterprise and Regulatory Reform, 2008) CONSULTATION DOCUMENT</b>		
This consultation seeks views on how to drive up the use of renewable energy in the UK, as part of the overall strategy for tackling climate change,	The government have proposed the following objectives; <ul style="list-style-type: none"> <li>• Additional financial incentives for</li> </ul>	The SA should assess the implications of the Lambeth CS on the UK's renewable energy targets. It should also aim to minimise

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<p>and to meet our share of the EU target to source 20% of the EU's energy from renewable sources by 2020. Responses to this consultation will help shape the UK Renewable Energy Strategy, which will be published in spring 2009, once the UK's share of the target has been agreed. This consultation considers a number of measures that have the potential to achieve 15% of UK energy consumption from renewables by 2020. The measures aim to stimulate the market to deliver the necessary investment in the most cost effective way by providing a clear long term framework and removing the obstacles to increasing renewable generation - while ensuring that sustainability concerns are minimised.</p>	<ul style="list-style-type: none"> <li>• electricity – extending and raising the level of the RO for large scale electricity and using either feed in tariffs or enhanced RO for microgeneration;</li> <li>• New financial incentives for heat – to encourage rapid growth in relatively low cost renewable energy technologies in homes and industry;</li> <li>• The contribution from the transport sector, including the contribution from biofuels given sustainability concerns and the role of electric cars;</li> <li>• Removing grid barriers to renewables – new incentives for National Grid to build grid infrastructure and reforming access arrangements;</li> <li>• Reducing planning consent barriers – providing strong guidance on training to local decision makers through a National Policy Statement, creating an expert body to advise planners and setting regional renewable targets that shape local economic strategies;</li> <li>• Using more energy from waste – discouraging biomass from being landfilled that can be used to generate energy and encouraging the use of food waste to generate energy;</li> <li>• Stimulating innovation and the supply chain – by setting a clear, long-term framework and considering how efforts to meet the 2020 target will impact on incentives to develop emerging renewable technologies.</li> </ul>	<p>energy consumption, increase energy efficiency and the use of renewable energy.</p> <p><b>SA Objective: Climate change and energy</b></p>
<p><b>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Department for Environment, Food and Rural Affairs, 2007)</b></p> <p>This Air Quality is an update of the 2000 strategy and sets objectives for eight main air pollutants to protect health. Performance against these</p>	<p><b>Objectives</b></p> <p>The strategy includes detailed objectives relating to all of the objectives relate to the</p>	<p>The air quality objectives are too detailed to base a SA on. However, the SA framework should include objectives that address the</p>

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objectives will be monitored where people are regularly present and might be exposed to air pollution and where vegetation may be affected.	protection of human health apart from those marked with a * that also have separate objectives related to the protection of vegetation and ecosystems: • Particles - PM10 and PM2.5 • Nitrogen dioxide (*for nitrogen oxides) • Ozone* • Sulphur dioxide* • Polycyclic aromatic hydrocarbons • Benzene • 1, 3 butadiene • Carbon monoxide • Lead	protection of air quality. <b>SA Objective: Air quality</b>
This latest strategy does not remove any of the objectives set out in the previous strategy or its addendum, apart from replacing the provisional 2010 PM10 objective in England, Wales and Northern Ireland with the exposure reduction approach (the focus here is improving the level in the country as a whole not just in localised hotspots).		
<b>Air Quality and Climate Change: A UK perspective (Department for Environment, Food and Rural Affairs, 2007)</b>	There are no specific objectives, targets or indicators of relevance.	The SA framework should include objectives that address the protection of air quality. <b>SA Objective: Air quality</b>
This report by the Air Quality Expert Group (AQEG) looks at the scientific background to interactions and synergies between air quality and climate change from the perspective of policy measures developed to address both or either, focusing on the UK and Europe in the period to 2022.	Recommendations highlighted the need to consider the linkages between climate change and air quality mitigation / improvement measures in policy development and to concentrate on measures that result in benefits for both air quality and climate.	
<b>Planning Policy Statement 1: Delivering Sustainable Development (Department for Communities and Local Government, 2005)</b>	There are no specific targets or indicators of relevance.	The SA framework should cover a broad range of sustainability topics. <b>Relevant to various SA objectives</b>
<b>The Countryside in and Around Towns: A Vision for Connecting Town and Country in the Pursuit of Sustainable Development (Countryside Agency and Groundwork, 2005)</b>		

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The document presents a new vision for a very extensive and often overlooked resource – the countryside in and around England's towns and cities. It promotes sustainable living through a number of provisions relating to the countryside (e.g. links between urban and countryside areas, health benefits and sustainable waste management). The vision at the heart of the challenge to reduce the pressures that urban life places on the local and global environment is: 'the need to ensure a high quality of life for all while at the same time reducing our collective impact on the resources we share'.	There are no specific targets or indicators of relevance.	The SA should contain objectives that address the relevant issues identified in the document, in particular the need to protect human health and quality of life.  <b>Relevant to various SA objectives</b>
<b>Planning Policy Statement 7: Sustainable Development in Rural Areas (Department for Communities and Local Government, 2004)</b>  This PPS sets out the Government's national policies on sustainable development in rural areas. The policies apply to the rural areas, including country towns and villages and the wider, largely undeveloped countryside up to the fringes of larger urban areas.	<u>Objectives</u> <ul style="list-style-type: none"> <li>• PPS 7 follows four of the Government's Objectives for rural areas:</li> <li>• To raise the quality of life and the environment in rural areas;</li> <li>• To promote more sustainable patterns of development;</li> <li>• Promoting the development of the English regions by improving their economic performance so that all are able to reach their full potential;</li> <li>• To promote sustainable, diverse and adaptable agricultural sectors.</li> </ul>	The SA should include objectives that address issues such as protection of biodiversity and habitats. The Lambeth CS should have regard to the objectives of the PPS.  <b>SA Objective: Biodiversity, Water quality and resources</b>
<b>Securing the Regions' Futures – Strengthening the Delivery of Sustainable Development in the English Regions (Defra, DTI and ODPM 2006)</b>  The five guiding principles and four priorities set out in the UK Sustainable Development Strategy provide the framework within which the English regions work to improve quality of life. This document sets out an additional 20 commitments (with clear guidance) in order to help regions make a step change in their contribution to delivering sustainable development. The key elements of this approach are: <ul style="list-style-type: none"> <li>• Using the sustainable development</li> </ul>	There are no specific targets or indicators of relevance.	This plan is primarily concerned with delivery of sustainable development at the regional level. Whilst not all elements are of relevance to this study, ensuring sustainable development in the regions is essential.  <b>Relevant to various SA objectives</b>

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<p>priorities and principles to underpin the refreshed or updated high-level regional strategies.</p> <ul style="list-style-type: none"> <li>Creating a strengthened role for regional sustainable development roundtables as champion bodies.</li> <li>Maximising the contribution which city-regions, subregions and inter-regional strategies can make to delivering sustainable development through innovative ways of working at these levels.</li> <li>Embedding sustainable development within the work of Government Offices and across their organisations and operations so as to become exemplars in the regions.</li> <li>Supporting the role of Regional Assemblies in delivering sustainable development through all their functions.</li> <li>Working with Regional Development Agencies to help them deliver economic productivity, which delivers sustainable development at the same time - and to ensure that this contribution is fully reflected in Regional Development Agency assessments.</li> </ul>	<p>This forms the Environment Agency's strategy for water resource management for the next 25 years. The focus of the strategy is on understanding the present state of water resources and planning for the management of water resources to prevent long-term environmental damage and degradation. The strategy highlights where water abstractions are unsustainable and where further water is needed. The issue of climate change and its impact upon our water resources are also considered. Thirty</p> <p>There are no specific targets or indicators of relevance.</p> <p>The SA should include objectives that promote the protection and enhancement of the water environment. This includes the need to achieve wise management and the sustainable use of water resources. Information about the water environment needs to be gathered through the baseline data collation process, for example in relation to the location of main rivers and floodplain.</p>	

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<p>action points are identified to deliver the strategy which include developing leakage control, encouraging good practice when using water and promoting the value of water.</p> <p><b>Future Water - The Government's water strategy for England (2008)</b></p> <p>The Government's new water strategy for England, <i>Future Water</i> was published 7 February 2008.</p> <p>This strategy sets out the Government's long-term vision for water and the framework for water management in England.</p> <p>Future Water builds on and replaces the previous strategy for water, <i>Directing the Flow</i>2 and its action points. This new strategy will help the government to realise all water commitments while contributing to two key Public Service Agreements:</p> <ul style="list-style-type: none"> <li>• securing a healthy natural environment for the future, for which water availability and quality are key, and for which the government have developed an ecosystems approach action plan to ensure integrated delivery; and</li> <li>• leading the global effort to avoid dangerous climate change.</li> </ul> <p>Future Water outlines a strategic and integrated approach to the sustainable management of water resources, for the public water supply as well as for the provision of healthy ecosystems and the services they provide. Achieving the vision will have social, environmental and economic implications, which needs to be addressed.</p>	<p>The vision for water policy and management is one where, by 2030 at the latest, there is:</p> <ul style="list-style-type: none"> <li>• improved the quality of the water environment and the ecology which it supports,</li> <li>• continued high levels of drinking water quality from taps;</li> <li>• sustainably managed risks from flooding and coastal erosion, with greater understanding</li> <li>• more effective management of surface water;</li> <li>• ensured a sustainable use of water resources, and implemented fair, affordable and cost reflective water charges;</li> <li>• cut greenhouse gas emissions; and</li> <li>• embedded continuous adaptation to climate change and other pressures across the water industry and water users.</li> </ul>	<p><b>SA Objective: Water quality and resources</b></p> <p>The SA should include objectives that promote the protection and enhancement of the water environment. This includes the need to achieve wise management and the sustainable use of water resources.</p> <p>Information about the water environment needs to be gathered through the baseline data collation process, for example in relation to the location of main rivers and floodplain.</p> <p><b>SA Objective: Water quality and resources</b></p>
<p>PPS25 sets out Government policy on development and flood risk. Its aims are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of</p> <p><b>PPS25 Development and Flood Risk (Department for Communities and Local Government, 2006) and Practice Guide (June 2008)</b></p>	<p>There are no specific targets or indicators of relevance. Effective monitoring and review is essential to managing flood risk. The Environment Agency monitors planning decisions regarding flood risk.</p>	<p>The SA should include an objective on reducing flood risk.</p> <p><b>SA Objective: Flood risk</b></p>

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<p>flooding, and to direct development away from areas of highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Regional Planning Bodies and local planning authorities should prepare and implement planning strategies that help to deliver sustainable development.</p> <p>The guide complements PPS25 by offering guidance on how to implement its policies in practice. It draws on existing good practice, through case studies and examples, to show how regional planning bodies and local planning authorities can deliver the national policies in PPS25 in the light of their own varying circumstances</p>	<p>The Practice Guide further develops the appraise, manage and reduce flood risk approach into the following hierarchy: assess; avoid: substitute: control: mitigate..</p>	<p>The SEA should assess the impact that the Lambeth CS could have on biodiversity and ecosystems.</p> <p><b>SA Objective: Biodiversity</b></p> <p><b>Planning Policy Statement 9: Biodiversity and Geological Conservation (Department for Communities and Local Government, 2005)</b></p> <p>This sets out the Government's national policies for the conservation of biodiversity and geodiversity. In the context of the PPS, biodiversity is the variety of life in all its forms as discussed in the UK Biodiversity Action Plan and geological conservation relates to sites that are designated for their geology and/or geomorphological importance.</p> <p>It sets out key principles which LPAs should adhere to, to ensure that the potential impacts of planning decisions on biodiversity and geological conservation are fully considered: LPAs should consider whether proposed developments can be accommodated without causing harm to biodiversity and geological conservation interests.</p> <p>Where development will result in unavoidable and significant adverse impacts on biodiversity and</p>

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<p>geological conservation, planning permission for it should only be granted where adequate mitigation measures are put in place.</p> <p>Development policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development.</p>		
<p><b>A Strategy for England's Trees, Woodlands and Forests (Department for Environment, Food and Rural Affairs, 2007)</b></p> <p>The strategy has a 10 – 15 year timescale and strives to achieve sustainable forest management. There are five aims identified for Government intervention in trees, woods and forests. The aims are:</p> <ul style="list-style-type: none"> <li>• To provide a resource of trees, woods and forests where they can contribute most in terms of environmental, economic and social benefits now and in the future.</li> <li>• To ensure that existing and newly-planted trees, woods and forests are resilient to the impacts of climate change and also contribute to the way in which biodiversity and natural resources adjust to climate change.</li> <li>• To protect and enhance the environmental resources of water, soil, air, biodiversity and landscapes and the cultural and amenity values of trees and woodland.</li> <li>• To increase the contribution that trees, woods and forests make to the quality of life for those living, working and visiting England.</li> <li>• To improve the competitiveness of woodland businesses and to promote new or improved markets for sustainable woodland products.</li> </ul>	<p>There are no specific targets or indicators of relevance.</p> <p>The SEA should assess the impact that the Lambeth CS could have on biodiversity and ecosystems.</p> <p><b>SA Objective: Biodiversity</b></p>	
<p><b>Working with the Grain of Nature: A Biodiversity Strategy for England (Department for Environment, Food and Rural Affairs, 2002)</b></p> <p>The Strategy seeks to ensure biodiversity considerations become embedded in all main sectors of public policy and sets out a programme for five years to make the changes necessary to</p>		<p>The Government is already committed, in its Quality of Life Counts indicators, to using key indicators to measure progress with sustainable development in the UK. Those</p> <p>The SEA should assess the impact that the Lambeth CS could have on biodiversity and ecosystems.</p>

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<p>conserve, enhance and work with the grain of nature and ecosystems rather than against them. The Strategy sets out a series of actions that will be taken by the Government and its partners to make biodiversity a fundamental consideration in (amongst other things):</p> <ul style="list-style-type: none"> <li>Marine and coastal management: so as to achieve the sustainable use and management of our coasts and seas using natural processes and the ecosystem-based approach.</li> </ul>	<p>particularly relevant to biodiversity and of relevance to this study are:</p> <ul style="list-style-type: none"> <li>The populations of wild birds</li> <li>The condition of Sites of Special Scientific Interest</li> <li>Progress with Biodiversity Action Plans</li> <li>Area of land under agri-environment agreement</li> <li>Biological quality of rivers</li> <li>A key Defra objective is to protect and improve the rural, urban, marine and global environment and lead on the integration of these with other policies across Government and internationally.</li> <li>Under this objective, key targets are: <ul style="list-style-type: none"> <li>To care for our natural heritage, make the countryside attractive and enjoyable for all and preserve biological diversity by:</li> <li>Reversing the long-term decline in the number of farmland birds by 2020, as measured annually against underlying trends</li> <li>Bringing into favourable condition by 2010 95% of all nationally important wildlife sites.</li> </ul> </li> </ul>	<p><b>SA Objective: Biodiversity</b></p>
<p><b>State of Nature: Lowlands – Future Landscapes for Wildlife (English Nature, 2004)</b></p>	<p>This report describes the state of nature in lowland England, and examines how a variety of pressures impact upon habitats and species. It identifies conservation successes achieved through positive action, and stresses the importance of working in partnership. It demonstrates that a landscape-scale approach to nature conservation is essential, but can only be delivered by involving people more actively, through integrating policies more effectively, and through successful partnership at regional and local levels. It illustrates how the approach</p> <p><b>Objectives</b></p> <p>Does not contain any objectives, but does refer to the ten most critical actions required to deliver environmentally sustainable management in the English lowlands:</p> <ul style="list-style-type: none"> <li>Invest in better environmental management and wildlife recovery on farms</li> <li>Stimulate appropriate management of farmland and woodland</li> <li>Improve water management</li> <li>Restore wetland habitats</li> </ul>	<p>The SEA should assess the impact that the Lambeth CS could have on biodiversity and ecosystems.</p> <p><b>SA Objective: Biodiversity</b></p>

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described in the England Biodiversity Strategy of delivering wildlife gains through working in partnership across sectors, can be put into action.	<ul style="list-style-type: none"> <li>• Reduce the threats and impacts from non-native invasive species</li> <li>• Reduce the cumulative impacts of development</li> <li>• Reduce the adverse effects of transport</li> <li>• Reduce atmospheric pollution</li> <li>• Adapt to the impacts of climate change</li> <li>• Improve management of the impacts of access and recreation</li> </ul>	
<b>PPG2: Green Belts (Department for Communities and Local Government, 1995, amended 2001)</b>  The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. The objectives of the policy are to:	<p>There are no specific targets or indicators of relevance.</p> <ul style="list-style-type: none"> <li>• provide opportunities for access to the open countryside for the urban population;</li> <li>• provide opportunities for outdoor sport and outdoor recreation near urban areas;</li> <li>• retain attractive landscapes, and enhance landscapes near to where people live;</li> <li>• improve damaged and derelict land around towns;</li> <li>• secure nature conservation interest; and</li> <li>• retain land in agricultural forestry and related uses.</li> </ul>	<p>The SEA should assess the impact that the Lambeth CS could have on biodiversity and ecosystems. It should also address the sustainability of the built environment by protecting open space, valued views and historic assets.</p> <p><b>SA Objectives: Biodiversity; Built and historic environment.</b></p>
<b>Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation (Department for Communities and Local Government, 2002)</b>  Open spaces, sport and recreation all underpin people's quality of life. Well designed and implemented planning policies for open space, sport and recreation are therefore fundamental to delivering broader Government objectives.	<p>Objectives</p> <p>Does not contain a specific set of objectives, but does state that Open spaces, sport and recreation all underpin people's quality of life. Well designed and implemented planning policies for open space, sport and recreation are therefore fundamental to delivering broader Government objectives.</p>	<p>The SEA should assess the impact that the Lambeth CS could have on biodiversity and ecosystems. It should also address the sustainability of the built environment by protecting open space, valued views and historic assets.</p> <p><b>SA Objectives: Biodiversity; Built and historic environment.</b></p>
<b>Sustainable Communities: Building for the Future (Department for Communities and Local Government, 2003)</b>  The plan proposed measures to tackle the	<p>There are no specific targets or indicators of</p>	<p>The SA should include objectives addressing</p>

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<p>housing provision mis-match between the South-East and parts of the North and the Midlands. It is part of the Government's wider drive to raise the quality of life in communities through increasing prosperity, reducing inequalities, providing more employment, better public services, better health and education, tackling crime and antisocial behaviour, and much more.</p> <p>It reflects the key principles for public service reform: raising standards, devolving and delegating decision-making, providing greater flexibility over use of resources and choice for customers.</p>	<p>relevance.</p>	<p>the protection of biodiversity and other environmental attributes, as the quality of the environment is an important factor affecting overall quality of life.</p> <p><b>Relevant to various SA objectives</b></p>
<p><b>The Egan Review: Skills for Sustainable Communities (Department for Communities and Local Government, 2004)</b></p> <p>Sustainable communities are defined as:</p> <p>"Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice. They achieve this in ways that make effective use of natural resources, enhance the environment, promote social cohesion and inclusion and strengthen economic prosperity."</p> <p>The key components of sustainable communities are:</p> <ul style="list-style-type: none"> <li>• Governance – effective and inclusive participation, representation and leadership.</li> <li>• Transport and connectivity – Good transport services and communications linking people to jobs, schools, health and other services.</li> <li>• Services – a full range of appropriate, accessible public, private community and voluntary services.</li> <li>• Environmental – providing places for people to live in an environmentally friendly way.</li> <li>• Economy – A flourishing and diverse local economy.</li> </ul> <p>Housing and the Built Environment – a quality built and natural environment</p> <p>Social and cultural – vibrant, harmonious and</p>	<p>A series of indicators are defined for each of the key components in the plan in order to monitor progress. Key indicators of relevance to this SEA include:</p> <ul style="list-style-type: none"> <li>• Percentage of residents surveyed who are concerned about different types of noise in their area covering road traffic, aircraft, trains, industrial/commercial premises, road works, construction and demolition.</li> <li>• Average no. of days where air pollution is moderate or high for nitrogen dioxide, sulphur dioxide, ozone, carbon monoxide and PM10.</li> <li>• Percentage of listed building of Grade I and II* at risk of decay.</li> <li>• Percentage of residents surveyed finding it easy to access key local services.</li> <li>• Percentage of people of working age in employment (with Black Minority Ethnic breakdown).</li> <li>• Average life expectancy.</li> </ul> <p><b>Relevant to various SA objectives</b></p>	

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<p><b>Planning Policy Statement 3: Housing (Department for Communities and Local Government, 2006)</b></p> <p>This PPS is the government's planning policy on housing and underpins the delivery of the Government's strategic housing policy objectives. It provides guidance on planning the provision of new housing on a regional basis and on the allocation of land for housing by local authorities.</p> <p>It also relates to the character of the built environment, stating that good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted</p> <p>Similarly, in Conservation Areas and other local areas of special character where, if proper attention is paid to achieving good design, new development opportunities can be taken without adverse impacts on their character and appearance.</p>	<p>The Government's key objective for housing is to ensure everyone has the opportunity to live in a decent, affordable home, in a community where they want to live.</p>	<p>The SA should include a policy relating to the provision of affordable housing.</p> <p><b>SA Objectives: Housing and Built and Historic Environment</b></p>
<p><b>Planning Policy Guidance 13: Transport (Department for Communities and Local Government, 2001)</b></p> <p>The objectives of this PPG13 are to integrate planning and transport at the national, regional, strategic and local level to:</p> <ul style="list-style-type: none"> <li>• promote more sustainable transport choices for both people and for moving freight;</li> <li>• promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and reduce the need to travel, especially by car.</li> </ul>	<p>The document does not contain any targets.</p>	<p>The SA framework should include objectives which address the need to protect the efficiency of the transport system. The baseline data collation process should also identify the main strategic transport links including roads, railway stations, airports and ports.</p> <p><b>SA Objective: Transport and travel</b></p>
<p><b>Planning Policy Guidance Note 15: Planning and the Historic Environment (Department for Communities and Local Government, 1994)</b></p> <p>This PPG provides a full statement of Government policies for the identification and protection of historic buildings, conservation areas, and other</p>	<p>Does not contain a specific set of objectives, but does state that 'the protection of the historic environment, whether individual listed</p>	<p>It will be important that the SA assesses the impact of the Lambeth CS on known built heritage features.</p>

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elements of the historic environment. It explains the role played by the planning system in their protection	buildings, conservation areas, parks and gardens, battlefields will need to be taken fully into account both in the formulation of authorities' planning policies and in development control'.	<b>SEA Objective: Built and historic environment</b>
<b>Planning Policy Guidance Note 16: Archaeology and Planning (Department for Communities and Local Government, 1990)</b>		
PPG16 gives advice on the handling of archaeological remains and discoveries under the development plan and control systems, including the weight to be given to them in planning decisions and the use of planning conditions. (Although separate controls exist for scheduled monuments).	Objectives To promote positive planning and management to bring about sensible solutions to the treatment of sites with archaeological remains and reduce the areas of potential conflict between development and preservation.	It will be important that the SA assesses the impact of the Lambeth CS on known built heritage features. <b>SEA Objective: Built and historic environment</b>
<b>Historic Environment: A Force For the Future (Department for Culture, Media and Sport, 2001)</b>		
This guidance sets actions to protect and sustain our heritage for future generations. The government vision is:  Public interest in the historic environment is matched by effective partnerships and the development of a sound base from which to develop policies.  Maximising the full potential of the historic environment as a learning resource.  Ensuring the historic environment is accessible to everybody and is seen as a something with which the whole of society can identify and engage with.	There are no specific targets or indicators of relevance.  The historic environment is protected and sustained for the benefit of our own and future generations.  The historic environment is an economic asset that is well harnessed.	It will be important that the SA assesses the impact of the Lambeth CS on known built heritage features. <b>SEA Objective: Built and historic environment</b>
<b>Planning Policy Statement 22: Renewable Energy (Department for Communities and Local Government, 2003)</b>		

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This PPS replaces PPG 22 (Renewable Energy). It sets out the Government's planning policies for renewable energy, which planning authorities should have regard to when preparing local development documents and when taking planning decisions.	<p>Objectives In light of Government objectives to cut carbon dioxide emissions and increase the generation of electricity from renewable energy sources, this planning policy statement looks to positive planning which facilitates renewable energy developments to contribute to all four elements of the Government's sustainable development strategy.</p> <p>Targets To generate 10% of UK electricity from renewable energy sources by 2010. The 2003 Energy White Paper ('Our energy – creating a low carbon economy') sets out the Government's aspirations to double that figure to 20% by 2020.</p>	The SA should assess the implications of the Lambeth CS on the UK's renewable energy targets. It should also aim to minimise energy consumption, increase energy efficiency and the use of renewable energy.  <b>SA Objective: Climate change and energy</b>
<b>Planning Policy Statement 1 Supplement: Planning and Climate Change – Supplement to PPS1 (Department for Communities and Local Government, 2007)</b>	<b>PPS1 – Planning and Climate Change – Supplement to PPS1 (Department for Communities and Local Government, 2006)</b>	<b>Planning Policy Statement 1 Supplement: Planning and Climate Change – Supplement to PPS1 (Department for Communities and Local Government, 2007)</b>
This PPS sets out how spatial planning (in providing for the new homes, jobs and infrastructure needed by communities) should contribute to reducing emissions and stabilising climate change (mitigation) and take into account the unavoidable consequences (adaptation).	There are no specific targets or indicators of relevance.	<p>The SA should assess the implications of the Lambeth CS on climate change emissions, particularly in relation to the reduction of greenhouse gases and the implementation of adaptation methods.</p> <p><b>SA Objective: Climate change and energy</b></p>
<b>PPS3 – Housing (Department of Communities and Local Government, 2006)</b>	<b>PPS3 – Housing (Department of Communities and Local Government, 2006)</b>	<b>PPS3 – Housing (Department of Communities and Local Government, 2006)</b>
We must help the Council to meet its obligations to housing provision as set out in PPS3. It requires that local councils plan to meet the requirements for housing opportunity, choice and mix and seek to create mixed communities:	<ul style="list-style-type: none"> <li>- provide sufficient housing land in sustainable locations</li> <li>- Make more efficient use of land</li> <li>• Promote good design</li> </ul>	<p>Lambeth Borough Council and London Government are already planning to implement many of these recommendations. The Lambeth CS should detail the location of homes and flats which are already being planned for this sustainable location.</p> <p><b>SA Objectives: Housing; Regeneration and efficient use of land</b></p>

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<p><b>PPS6 Town Centres (Department of Communities and Local Government, 2005)</b></p> <p>The objectives for town centres, which our strategy must support, are:</p> <ul style="list-style-type: none"> <li>- Location of major generators of travel in existing centres, where access by a choice of means of transport not just the car is easy and convenient</li> <li>- Enable town, district and local centres to meet the needs of residents of their area</li> <li>- Safeguard and strengthen existing centres in both urban and rural areas which offer a range of everyday community, shopping and employment opportunities</li> <li>- Maintain and improve choice for people to walk, cycle or catch public transport, and</li> <li>- Ensure an appropriate supply of attractive, convenient and safe parking for shopping and leisure trips</li> </ul>	<p>The SA framework should cover a broad range of sustainability topics, in particular in relation to maintaining sustainable communities. Establishing a sustainable community is influenced by a number of factors including accessibility to employment and also the quality of the built and natural environment</p> <p><b>Relevant to various SA objectives</b></p>	<p>The SA will be a key mechanism for helping to deliver these objectives particularly in helping to identify environmental limits, policies that help or hinder strong communities, and policies that promote lasting economic growth.</p> <p>Furthermore SA will encourage the use of sound science through the collection of an evidence base and is a key tool for helping to achieve better governance.</p> <p><b>Relevant to various SA objectives</b></p>
<p><b>Securing the future: Delivering the UK Sustainability Development Strategy ODPM 2005</b></p> <p>The strategy reiterates the purpose and goal of the framework but further defines the strategy for sustainable development in the UK including shared priorities for UK action including:</p> <ul style="list-style-type: none"> <li>- Sustainable consumption and production;</li> <li>- Climate change and energy;</li> <li>- Natural resource protection and environmental enhancement; and</li> <li>- Sustainable communities</li> </ul> <p>The strategy further develops the indicators discussed in 'A better quality of life' (1999), adding new indicators and refining existing ones. Baseline information for these indicators is due to be released summer 2005.</p> <p>As a result of the Sustainable Development Commission's review of progress since 1999 entitled 'Shows promise but must try harder', the strategy has created more focus on key areas which will help to achieve sustainable</p>	<p><b>Securing the future: Delivering the UK Sustainability Development Strategy ODPM 2005</b></p> <p>The strategy reiterates the purpose and goal of the framework but further defines the strategy for sustainable development in the UK including shared priorities for UK action including:</p> <ul style="list-style-type: none"> <li>- Sustainable consumption and production;</li> <li>- Climate change and energy;</li> <li>- Natural resource protection and environmental enhancement; and</li> <li>- Sustainable communities</li> </ul> <p>The strategy further develops the indicators discussed in 'A better quality of life' (1999), adding new indicators and refining existing ones. Baseline information for these indicators is due to be released summer 2005.</p> <p>As a result of the Sustainable Development Commission's review of progress since 1999 entitled 'Shows promise but must try harder', the strategy has created more focus on key areas which will help to achieve sustainable</p>	<p><b>Securing the future: Delivering the UK Sustainability Development Strategy ODPM 2005</b></p> <p>The strategy reiterates the purpose and goal of the framework but further defines the strategy for sustainable development in the UK including shared priorities for UK action including:</p> <ul style="list-style-type: none"> <li>- Sustainable consumption and production;</li> <li>- Climate change and energy;</li> <li>- Natural resource protection and environmental enhancement; and</li> <li>- Sustainable communities</li> </ul> <p>The strategy further develops the indicators discussed in 'A better quality of life' (1999), adding new indicators and refining existing ones. Baseline information for these indicators is due to be released summer 2005.</p> <p>As a result of the Sustainable Development Commission's review of progress since 1999 entitled 'Shows promise but must try harder', the strategy has created more focus on key areas which will help to achieve sustainable</p>

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<p>development. This includes the new integrated framework goal and a renewed push on delivering rather than talking about it.</p> <p>A challenge for authorities will be to take on board the framework goal, talking the four objectives of Sustainable Development simultaneously. Additionally, ensuring that policies meet the 5 guiding principles:</p> <ul style="list-style-type: none"> <li>- living within environmental limits;</li> <li>- Ensuring a strong, healthy and just society;</li> <li>- achieving a sustainable economy;</li> <li>- promoting good governance; and</li> <li>- using sound science responsibility.</li> </ul> <p>For a policy to be 'sustainable' it must respect all five of the principles set out above</p>		
	<p><b>Waste Strategy for England (Department for Environment, Food and Rural Affairs, 2007)</b></p> <p>The strategy highlights that significant progress has been made since the 2000 strategy. However, performance still lags behind other European countries. The Government's key objectives are:</p> <ul style="list-style-type: none"> <li>• to decouple waste growth from economic growth and put more emphasis upon waste prevention and re-use;</li> <li>• meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020;</li> <li>• increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste;</li> <li>• secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste; and</li> <li>• get the most environmental benefit from investment through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.</li> </ul>	<p>The SA should include an objective relating to the minimisation of the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p> <p><b>SA Objective: Waste</b></p> <p>The strategy includes targets for reducing household waste production but these are not relevant to this review. The strategy expects a reduction of commercial and industrial waste going to landfill by at least 20% by 2010 compared to 2004. A number of indicators are used in the strategy to characterize current waste management in England.</p>

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The strategy address hazardous waste and states that policies will be pursued to reduce hazardous waste arising. The Government is seeking to identify ways to recover material and energy resources from hazardous waste.		
<b>Planning Policy Statement 10: Planning for Sustainable Waste Management (Department for Communities and Local Government, 2005)</b>	<p>PPS 10 sets out the national policy for land use planning issues relating to waste management.</p> <p>Objectives:</p> <ul style="list-style-type: none"> <li>The statement sets out a number of key planning objectives that aim to Drive waste management up the waste hierarchy;</li> <li>Provide sufficient and timely provision of waste management facilities that meet the needs of their communities;</li> <li>Implement the national waste strategy and support European legislation;</li> <li>Secure the recovery and disposal of waste does not harm the human health or the environment</li> <li><input type="checkbox"/> Ensure waste is disposed of as near as possible to the place of production</li> <li>Reflect the concerns and interests of local communities, needs of waste collection/disposal authorities and business and encourages competition</li> <li>Protect the Green Belt, but, recognise that some types of waste management facilities have wider environmental and economic benefits of waste management are a material consideration</li> <li>Ensure that the layout and design of new development supports sustainable waste management</li> <li>Self-sufficiency that represents the volume and composition of waste generated at the regional level</li> </ul>	<p>The SA should include an objective relating to the minimisation of the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p> <p><b>SA Objective: Waste</b></p>

**The First Soil Action Plan For England: 2004-2006 (Department for Environment, Food and Rural Affairs, 2004)**

The Action Plan contains 52 actions on issues There are no specific objectives, targets or The SA framework should include an

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
ranging from soil management on farms to soils in the planning system, soils and biodiversity, contamination of soils and the role of soils in conserving cultural heritage and landscape. All of the actions make a step towards more sustainable soil use and protection.	indicators of relevance.	objective addressing the protection of the soil resource (this is also one of the SEA Directive topics). The Lambeth CS could have implications on the remediation of contaminated soils through the regeneration of brownfield sites.
		<b>SA Objective: Soil and natural resources</b>
<b>Planning Policy Statement 23 Planning and Pollution Control (Department for Communities and Local Government, 2004)</b>		
The PPS requires that international environmental and pollution control obligations are met, whilst at the same time meeting sustainable development objectives and applying the precautionary principle in considering development documents. This Statement advises that any consideration of the quality of land, air or water and leading to impacts on health, is capable of being a material planning consideration, in so far as it arises or may arise from or may affect any land use.	There are no specific targets or indicators of relevance.	The SA should examine the effects of the Lambeth CS on emissions to air, land and water.
		<b>SA Objectives: Air Quality; Water quality and resources; Waste</b>
<b>Planning Policy Guidance Note 24 Planning and Noise (Department for Communities and Local Government, 1994)</b>		
This PPG gives guidance to local authorities in England on the use of their planning powers to minimise the adverse impact of noise and builds on the advice previously contained in DOE Circular 10/73.	There are no specific targets or indicators of relevance.	The SA should assess the effects of the plan on noise including from disturbance to local populations and also wildlife.
		<b>SA Objective: Noise and air quality</b>
<b>CABE/English Heritage Tall Buildings Guidance (revised July 2007)</b>		
This revised document sets out how CABE and English Heritage evaluate proposals for tall buildings, including criteria. It also offers advice on good practice in relation to tall buildings in the planning process.		<b>SA Objective: Built and Historic Environment.</b>
<b>CABE Better Places By Design: A companion Guide PPG3 National</b>		
This document outlines key principles of good urban design, as follows:	This document outlines key principles of good urban design, as follows:	This document outlines key principles of good urban design, as follows:
<ul style="list-style-type: none"> <li>• Continuity and Enclosure</li> <li>• Quality of Public Realm</li> </ul>	<ul style="list-style-type: none"> <li>• Continuity and Enclosure</li> <li>• Quality of Public Realm</li> </ul>	<ul style="list-style-type: none"> <li>• Continuity and Enclosure</li> <li>• Quality of Public Realm</li> </ul>

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<ul style="list-style-type: none"> <li>• Ease of Movement</li> <li>• Legibility</li> <li>• Adaptability</li> <li>• Diversity</li> </ul>	<ul style="list-style-type: none"> <li>• Ease of Movement</li> <li>• Legibility</li> <li>• Adaptability</li> <li>• Diversity</li> </ul>	<ul style="list-style-type: none"> <li>• Ease of Movement</li> <li>• Legibility</li> <li>• Adaptability</li> <li>• Diversity</li> </ul>
<p><b>DCLG/Home Office. Safer Places: Planning System and Crime Prevention</b></p> <p>The guide focuses on 7 attributes of sustainability that are particularly relevant to crime prevention. Although not to be applied to all situations, they should be considered as means to thinking about crime prevention, and promoting community safety through the planning system. The attributes of safe, sustainable places are:</p> <ul style="list-style-type: none"> <li>• <u>Access and Movement</u>: places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security;</li> <li>• <u>Structure</u>: places that are structured so that different uses do not cause conflict</li> <li>• <u>Surveillance</u>: places where all publicly accessible spaces are overlooked</li> <li>• <u>Ownership</u>: places that promote a sense of ownership, respect, territorial responsibility and community</li> <li>• <u>Physical Protection</u>: places that include necessary, well-designed security features</li> <li>• <u>Activity</u>: places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times</li> <li>• <u>Management and Maintenance</u>: places that are designed with management and maintenance in mind, to discourage crime in the present and the future</li> </ul>	<p>The guide focuses on 7 attributes of sustainability that are particularly relevant to crime prevention. Although not to be applied to all situations, they should be considered as means to thinking about crime prevention, and promoting community safety through the planning system. The attributes of safe, sustainable places are:</p> <ul style="list-style-type: none"> <li>• <u>Access and Movement</u>: places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security;</li> <li>• <u>Structure</u>: places that are structured so that different uses do not cause conflict</li> <li>• <u>Surveillance</u>: places where all publicly accessible spaces are overlooked</li> <li>• <u>Ownership</u>: places that promote a sense of ownership, respect, territorial responsibility and community</li> <li>• <u>Physical Protection</u>: places that include necessary, well-designed security features</li> <li>• <u>Activity</u>: places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times</li> <li>• <u>Management and Maintenance</u>: places that are designed with management and maintenance in mind, to discourage crime in the present and the future</li> </ul>	<p>The guide focuses on 7 attributes of sustainability that are particularly relevant to crime prevention. Although not to be applied to all situations, they should be considered as means to thinking about crime prevention, and promoting community safety through the planning system. The attributes of safe, sustainable places are:</p> <ul style="list-style-type: none"> <li>• <u>Access and Movement</u>: places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security;</li> <li>• <u>Structure</u>: places that are structured so that different uses do not cause conflict</li> <li>• <u>Surveillance</u>: places where all publicly accessible spaces are overlooked</li> <li>• <u>Ownership</u>: places that promote a sense of ownership, respect, territorial responsibility and community</li> <li>• <u>Physical Protection</u>: places that include necessary, well-designed security features</li> <li>• <u>Activity</u>: places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times</li> <li>• <u>Management and Maintenance</u>: places that are designed with management and maintenance in mind, to discourage crime in the present and the future</li> </ul>
<p><b>Historic Environments: A Force for our Future DCMS/DTLR National Policy</b></p> <p>The document sets out the Government's principles for 'protecting and sustaining' historic</p>	<p>The document sets out the Government's principles for 'protecting and sustaining'</p>	<p>The document sets out the Government's principles for 'protecting and sustaining'</p>

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<b>build assets.</b> In order to deliver more attractive towns and cities, a prosperous and sustainable countryside, would class tourist attractions, new jobs and learning, vibrant and self confident communities, for us and future generations.	historic build assets. In order to deliver more attractive towns and cities, a prosperous and sustainable countryside, would class tourist attractions, new jobs and learning, vibrant and self confident communities, for us and future generations.	historic build assets. In order to deliver more attractive towns and cities, a prosperous and sustainable countryside, would class tourist attractions, new jobs and learning, vibrant and self confident communities, for us and future generations.
<b>Guidance on the Management of Conservation Areas (EH 2005) National Guidance/material consideration</b>	The document gives specific guidance for types of policies where heritage will be an issue. It includes advice on the production of Area Action Plans. These documents should clearly set out action plans based on Conservation Area Appraisals or go into extra detail for specific areas where development control will be needed to benefit a conservation area.	The document gives specific guidance for types of policies where heritage will be an issue. It includes advice on the production of Area Action Plans. These documents should clearly set out action plans based on Conservation Area Appraisals or go into extra detail for specific areas where development control will be needed to benefit a conservation area.
<b>CLG's 'Building a Greener Future' (CLG Policy Statement July 2007)</b>	This policy statement confirms the Government's intention for all new homes to be zero carbon by 2016.	Major progressive tightening of the energy efficiency building regulations - by 25 per cent in 2010 and by 44 per cent in 2013 - up to the zero carbon target in 2016.
<b>EER – South East of England Regional Assembly</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
The South East Plan applies requirements for Sustainable Development to regional issues. It provides a framework for sustainable development for this strategic region until 2026. Its core strategy aims to balance substantial economic and housing development with rising	The Plan contains more than 100 policies on key issues for regional planning. The main topics are: economy; housing; transport and communications; natural resource management; waste and minerals; countryside and urban management; town centres; tourism and related sport and recreation; and deprivation and social inclusion.	The SA should include objectives addressing the protection of biodiversity and other environmental attributes, as the quality of the environment is an important factor affecting overall quality of life.

**Table A3 – Regional and London Policy**

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme <b>Relevant to various SA objectives</b>
<p>standards of environmental management and resource use and reduced levels of social exclusion and natural resource consumption.</p> <p>By 2026, the result is intended to be a healthier region</p>	<p><b>Sustainable Development Framework for London</b></p> <p>The commission's Sustainable Development Framework for London was endorsed by the Mayor at its launch on 5<sup>th</sup> June 2003. The London Framework sets out a sustainable vision for the capital and its aim is to:</p> <ul style="list-style-type: none"> <li>• Provide the context for policy development and decision-making;</li> <li>• Undertake sustainability appraisals of projects, plans and strategies; and</li> <li>• Monitor progress towards a more sustainable city.</li> </ul>	<p>The London Framework includes a set of objectives to guide decision making, as follows:</p> <ul style="list-style-type: none"> <li>• Responsibility – aware of our impacts on UK and beyond. Take a work lead;</li> <li>• Capability – ensuring everyone has the ability and understanding to contribute;</li> <li>• Creativity – Seeking new and creative ways to overcome constraints to being more sustainable;</li> <li>• Ownership – Build a sense of ownership and responsibility towards the city;</li> <li>• Fulfilment – culture of fairness and respect for people and the environment;</li> <li>• Diversity – celebration of diversity and freedom from discrimination;</li> <li>• Safety – a city where people feel at ease – free from the threat of violence, crime or intrusion</li> <li>• Vibrancy – Communities which are dynamic, stable, adaptable, innovative, progressive;</li> <li>• Environment – Protect and improve city's natural ecosystems, biodiversity, open spaces and build environment and wider systems London in linked to;</li> <li>• Resources – limit and deal with pollution and use energy and material resources prudently efficiently and effectively including reuse and recycling of waste;</li> <li>• Progress – consistent economic progress – not necessarily always growth – to enable wider economic – social and environmental benefits.</li> <li>• Ethical business standards;</li> <li>• Innovation – New technology and ideas will be invested in all sectors of the economy to help</li> </ul>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
	<ul style="list-style-type: none"> <li>• achieve sustainable development;</li> <li>• Esteem – all forms of work will be recognized and valued – paid employment will be plentiful; and</li> <li>• Access – Healthy and fulfilled through living in good housing with wide opportunities to develop as communities with access to good quality food, green space, cultural, sporting and leisure activities.</li> </ul>	<p><b>The London Plan (Consolidated with Alterations since 2004, published February 2008<sup>1</sup>)</b></p> <p>The London Plan is the spatial development strategy for London establishing the strategic context for London's social, economic and physical development in 2016.</p> <p>The vision for London that it describes is to develop the city as an exemplary, sustainable world city, based on the three balanced and interwoven themes of a strong, long term and diverse economic growth, social inclusivity and fundamental improvements in the environment and use of resources.</p> <p>Six specific objectives stem from this vision:</p> <ul style="list-style-type: none"> <li>• to accommodate London's growth within its boundaries without encroaching on open spaces;</li> <li>• to make London a more prosperous city with strong and diverse economic growth;</li> <li>• to promote social inclusion and tackle deprivation and alienation</li> <li>• to improve London's accessibility; and</li> <li>• to make London a more attractive, well – designed and green city</li> </ul>
		<p><b>Sustainable Design and Construction SPG (May 2006)</b></p> <p>This SPG provides additional information to support the implementation of the London Plan. As SPG this document cannot set new policy, but has weight as a formal supplement to the London Plan.</p>
		<p>The SPG is applicable to all building types and associated spaces, with specific information on different building types provided where relevant. London Plan Policy 4B.6 relates to sustainable design and construction and sets the context for this SPG. The SPG provides guidance on the way that the seven measures identified in the policy can be implemented to meet the London Plan objectives.</p> <p>Sets essential standards including:</p> <p>100% of development on previously developed land, unless very special circumstances can be demonstrated</p>

<sup>1</sup> Adopted 2008

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
	<p>Carbon emissions from the total energy needs (heat, cooling and power) of the development should be reduced by at least 10% by the onsite generation of renewable energy.</p> <p>50% timber and timber products from Forest Stewardship Council (FSC) source and balance from a known temperate source</p> <p>Residential developments to achieve average water use in new dwellings of less than 40m<sup>3</sup> per bedspace per year (approximately 110 litres/head/day)</p> <p>Achieve 50% attenuation of the undeveloped site's surface water run off at peak times: (this is a minimal target – London Plan policy 4A.14 (Sustainable drainage) states that developers should aim to achieve Greenfield run off from their sites)</p> <p>All residential development should meet Lifetime Home standards and 10% should meet wheelchair accessibility standards</p> <p>No net loss of publicly accessible open space</p> <p>No net loss of biodiversity and access to nature on the development site</p> <p>Provide facilities to recycle or compost at least 25% of household waste by means of separated dedicated storage space. By 2010 this should rise to 35%.</p>	<p><b>Industrial capacity SPG (March 2008)</b></p> <p>The SPG is focused on the implementation of London Plan Policies 2A.10 and 3B.4 to manage, promote and, where appropriate, protect Strategic Industrial Locations (SILs) as London's main reservoir of industrial capacity</p> <p>The SPG provides guidance to ensure an adequate stock of industrial capacity to meet the future needs and functional requirements of different types of industrial and related uses in different parts of London. Also to plan, monitor and manage the</p>

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
to accommodate industry and other activities with similar land use needs (including logistics, waste management, utilities and transport functions). It also provides guidance on the implementation of strategic policy to manage the protection, release or enhancement of industrial sites outside the SIs including Locally Significant Industrial Sites (LSIS) and other industrial sites not categorised as SII or LSIS.	<p>release of surplus industrial land so that it can better contribute to strategic and local planning objectives, especially those to provide more housing (including affordable housing) and in appropriate locations provide social infrastructure and contribute to town centre renewal</p> <p>Includes 'benchmark' figures for releasing industrial land in the London sub regions.</p>	<p>Lambeth classified in the 'restricted transfer of industrial sites' category. Boroughs in this category typically have low levels of industrial land relative to demand (particularly for waste management or land for logistics) and/or low proportions of industrial land within the SII framework. Boroughs in this category are encouraged to adopt a more restrictive approach to the transfer of industrial sites to other uses. This does not preclude the possibility of smaller scale release where boroughs have made adequate provision of industrial land in their DPDs in particular for waste management and logistics uses.</p>
	<p><b>GLA London View Management Framework Draft Regional SPG</b></p> <p>This SPG sets out strictly geometrically defined, cross border height limits across London which protect views of St. Paul's Cathedral, the Houses of Parliament and the Tower of London from various vantage points. These restrictions protect views of internationally significant historic sites from being blocked by new buildings.</p> <p>The Draft Framework sets out a number of other strategic views. Namely River Prospects and Townscape views. These are not protected to the same extent as views to St. Paul's and the Houses of Parliament, but buildings appearing in these views must take account of a number of requirements.</p>	<p>This SPG sets out strictly geometrically defined, cross border height limits across London which protect views of St. Paul's Cathedral, the Houses of Parliament and the Tower of London from various vantage points. These restrictions protect views of internationally significant historic sites from being blocked by new buildings.</p> <p>The Draft Framework sets out a number of other strategic views. Namely River Prospects and Townscape views. These are not protected to the same extent as views to St. Paul's and the Houses of Parliament, but buildings appearing in these views must take account of a number of requirements.</p>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<p><b>Sustainable Communities in London. ODPM 2003</b></p> <p>This plan reiterates the Sustainable Communities Plan specifically targeting London. The plan seeks to promote communities that:</p> <ul style="list-style-type: none"> <li>• Are prosperous;</li> <li>• Have decent homes for sale or rent at a price people can afford;</li> <li>• Safeguard green and open space;</li> <li>• Enjoy a well-designed, accessible and pleasant living and working environment; and</li> <li>• Are effectively and fairly governed with a strong sense of community.</li> </ul> <p>The plan has set the following targets to achieve by 2016:</p> <ul style="list-style-type: none"> <li>• Need to accommodate a population growth of 700,000</li> <li>• Employment growth of a net 636,000 jobs</li> <li>• The need for 345,000 additional homes</li> <li>• Urgent need for affordable homes to accommodate growing population</li> <li>• Tackle unemployment in ethnic minority groups especially where rate is twice the national average</li> <li>• Tackle differences in life expectancy which, between worst and best London boroughs is 6 years for men and 4 for women</li> <li>• Provide housing, tackle homelessness and ensure decent homes for all</li> <li>• Improvements in Planning – achieving greater housing density in well designed development. Low density developments now have to be referred to the Secretary of State</li> <li>• Better construction methods</li> <li>• Tackle Overcrowded public transport which sits alongside severe road congestion</li> <li>• Education and skills – educational attainment and low skills. Many areas have some of the worst performing LEAs in the country</li> <li>• Crime – highest crime rate for any region 14,800 offences per 100,000 and 44% of the robbery in England and Wales</li> </ul> <p><b>SA Objectives: Housing; Transport and travel; Access and services</b></p>	<p>these views must take account of a number of requirements.</p> <p>The SA framework should include objectives specifically relating to the provision of affordable housing, tackling homelessness, improving the walking environment and providing additional housing near work places, and increasing the population density only in well connected areas to encourage sustainable transport choices.</p> <p><b>SA Objectives: Housing; Transport and travel; Access and services</b></p> <p>The SA framework should include objectives which address the need to reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public</p>	

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
air, and riverbus services. Interchange occurs when people transfer from one of these modes of transport to another, or between two services of the same mode. In addition, people join or leave the public transport system on foot, by bicycle, motorcycle, and car.	<ul style="list-style-type: none"> <li>• interchanges are developed and improved in line with a clear and consistent set of principles;</li> <li>• Providing operational guidelines; and</li> <li>• Setting out some initial guidance on the development of joint funding packages.</li> </ul> <p>This document provides best practice guidelines to encourage the many organisations responsible for planning, funding, managing, and representing the users of interchanges in London to improve and enhance their joint working.</p>	<p><b>GLA Strategies (various)</b>. The spatial aspects of the Mayor of London's strategies should be reflected in the London Plan. However, some have been produced since the last London Plan alterations (e.g. in revised drafts) and have relevance to Borough LDFs, e.g.:</p> <p><b>London Climate Change Adaptation Strategy (draft August 2008)</b></p> <p>To help London and Londoners prepare for the impacts of climate change and extreme weather</p> <p>Proposes priority actions to address flooding, drought and heat waves.</p> <p><b>SA Objective: Transport and Travel</b></p> <p>transport.</p> <p>The baseline data collation process should also identify the main strategic transport links including roads, railway stations, airports and ports.</p>
		<p><b>SA Objective: Transport and Travel</b></p> <p>SA Framework needs to design new development to best address flood, drought and overheating issues (including urban greening), and promote water conservation and efficiency.</p> <p><b>SA Objective: climate change and energy.</b></p>
	<p><b>London Water Strategy (Draft March 2007)</b></p> <p>Addresses options for tackling problems of water supply in London.</p>	<p>2008 Further Alterations to London Plan contain a new policy on water use and conservation. Water Strategy includes a proposal that developers should demonstrate adequate water supply to serve the development and that there is adequate capacity to dispose of the waste water generated at the site.</p> <p><b>SA Objective: water quality and resources.</b></p>
	<p><b>Health Inequalities Strategy (draft 30<sup>th</sup> Jan 2008)</b>.</p> <ul style="list-style-type: none"> <li>• To reduce income inequalities and minimise the consequences of relative poverty</li> <li>• To increase opportunities for people to</li> </ul>	<ul style="list-style-type: none"> <li>• increasing the supply of affordable housing and ensuring new developments are designed and constructed in ways that improve health and reduce health inequalities</li> </ul> <p>The SA Framework should mainstream these health issues throughout the objectives.</p>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme <i>Relevant to various SA objectives</i>
<ul style="list-style-type: none"> <li>access the potential benefits of work and other forms of meaningful activity</li> <li>• To empower individuals and communities to take action to improve their health and well-being</li> <li>• To improve the health of people living with illness or impairment</li> <li>• To develop and promote London as a healthy place for all – from neighbourhoods to the city as a whole</li> <li>• To develop London as a world leader in the creation of knowledge about health inequalities and the use of shared learning to achieve sustained change</li> </ul>	<ul style="list-style-type: none"> <li>• bringing physical improvements to areas of London that are deprived, physically run-down and not conducive to good health</li> <li>• promoting places that are safe, accessible and promote social cohesion</li> <li>• making more explicit links between planning and actions on the environment and those on health and well-being, prioritising climate change adaptation and mitigation.</li> </ul>	<p><b>SA Objective Transport and Travel</b></p> <p>Mayor's Transport Strategy (2001), revised 2004 (introduced Central Congestion Charging Zone) and 2006 (Low Emission Zone). Also Transport Strategy Implementation Targets (July 2004)</p> <p>Ten key transport priorities.</p> <p>The Strategy aimed to:</p> <ul style="list-style-type: none"> <li>• Reducing traffic congestion.</li> <li>• Overcoming the backlog of investment on the Underground so as to safely increase capacity, reduce overcrowding, and increase both reliability and frequency of services.</li> <li>• Making radical improvements to bus services across London, including increasing the bus system's capacity, improving reliability and increasing frequency of services.</li> <li>• Better integration of the National Rail system with London's other transport systems to facilitate commuting, reduce overcrowding, increase safety and move towards a London-wide, high frequency 'turn up and go' Metro service.</li> <li>• Increasing the overall capacity of London's transport system by promoting: major new cross-London rail links including improving</li> </ul> <p>Alongside this, the Strategy supported the principle of a central London congestion charging scheme. This, together with the Strategy's improvements in public transport, aimed to significantly ease congestion over the next ten years, with:</p> <ul style="list-style-type: none"> <li>• a 15 per cent reduction in traffic in central London;</li> <li>• reduction of traffic growth in inner London to zero;</li> <li>• reduction of traffic growth in outer London by a</li> </ul> <p>Transport Strategy and London Plan guidance modified by LIP Guidance.</p>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<ul style="list-style-type: none"> <li>access to international transport facilities, improved orbital rail links in inner London; and new Thames river crossings in east London.</li> <li>Improving journey time reliability for car users, which will particularly benefit outer London where car use dominates, whilst reducing car dependency by increasing travel choice.</li> <li>Supporting local transport initiatives, including improved access to town centres and regeneration areas, walking and cycling schemes, Safer Routes to School, road safety improvements, better maintenance of roads and bridges, and improved co-ordination of streetworks.</li> <li>Making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts.</li> <li>Improving the accessibility of London's transport system so that everyone, regardless of disability, can enjoy the benefits of living in, working in and visiting the Capital, thus improving social inclusion.</li> <li>Bringing forward new integration initiatives to: provide integrated, simple and affordable public transport fares; improve key interchanges; enhance safety and security across all means of travel; ensure that taxis and private hire vehicles are improved and fully incorporated into London's transport system; and provide much better information and waiting environments.</li> </ul>	<p>third.</p> <p>In the context of preparation of guidance to the London boroughs on development of their Local Implementation Plans (LIPs) for the Mayor's Transport Strategy (MTS), certain new statutory targets have been set by the Mayor relating to delivery of local transport improvements by Transport for London (TfL) and the London boroughs. These are set out in the 2004 Target document and below:</p> <ol style="list-style-type: none"> <li>1. <b>Road Safety:</b> TfL and boroughs (obtaining the support of the Police where appropriate) are to achieve a reduction of 40% in numbers Killed and Seriously Injured by 2010 compared with 1994-1998 overall and separately for pedestrians, cyclists and motorcyclists; a reduction of 50% in the number of children killed or seriously injured and a reduction of 10% in the slight casualty rate per 100 million vehicle kilometres. (Existing target set in table following Paragraph 4G,44 of the Transport Strategy; also referenced in the London Road Safety Plan). Target applies at London wide and individual borough level.</li> <li>2. <b>School Road Safety:</b> Boroughs are to review road safety* around all primary and secondary schools in London by 2008. (New target). Target applies at London wide and individual borough level. *Where the reviews show these to be necessary, 20mph zones or other safety measures must be implemented by 2011 to support achievement of Target 1 (road safety).</li> <li>3. <b>Bus Excess Wait Time:</b> TfL are to reduce bus excess wait time (EWT) to 1.3 minutes per passenger journey by 2009/10. (New target). Target applies at London wide level.</li> <li>4. <b>Borough Bus Target:</b> An additional target will be</li> </ol>	

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
	<p>Set for boroughs' contribution to improving bus journey times through the management of their road space. This will be discussed with boroughs over the next 12 months, with the aim of setting the Target in summer 2005.</p> <p>5. Traffic volumes: TfL and boroughs are to achieve, between 2001 and 2011, an absolute reduction in weekday traffic of 15% in central London, zero growth across the rest of inner London, and a reduction in growth in outer London by a third, with the aim of achieving zero growth in outer London town centres<sup>1</sup>. (Existing target set in Proposal 4.G.12 of the Transport Strategy).</p> <p>Target applies at London wide level. Boroughs must publish a local traffic volume reduction target in their LIP setting out their contribution to the London wide target, taking account of local factors and of the sub-regional analysis.</p> <p>6. General Traffic Journey Time Reliability: TfL and boroughs are to ensure disruption and variability of journey times for general traffic on 'A' roads and busy bus routes is reduced, or not increased, year on year. (New target). Target applies at London wide and individual borough level.</p> <p>7. Modal Shift: TfL and boroughs are to maintain or increase the proportion of personal travel made by means other than car. (New target). Target applies at London wide level.</p> <p>8. School Travel Plans: Boroughs are to work with schools or groups of schools to review travel to all schools by March 2008, with significant progress having been made by March 2006*. (New target, with regard to national DfT/DfES 'Travelling to School: an action plan' target). Target applies at London wide and individual borough level. *Travel plans should be developed and implemented where required to support the achievement of Target 7 (modal shift).</p>	

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	<p>9. Compliance: boroughs are to achieve improvements in compliance with parking and loading regulations from a baseline to be agreed between boroughs and TfL by December 2004. Target applies at London wide level.</p> <p>10. Access: TfL and boroughs are to achieve year on year improvements in the proportion of trips made by equality and inclusion target groups under-represented in the public transport travel market, particularly disabled people and women travelling at night. (New target). Target applies at London wide level.</p> <p>11. Taxicard: Boroughs are to ensure that their Taxicard scheme conforms to an agreed all-London standard in terms of service quality, eligibility assessment and entitlement by 2006. (New target). Target applies at individual borough level.</p> <p>12. Walking: TfL and boroughs are to achieve an increase of at least 10% in journeys made on foot per person in London between 2001 and 2015. (New target). Target applies at London wide level.</p> <p>13. Cycling: TfL and boroughs are to achieve an increase of at least 80% in cycling in London between 2001 and 2011. (New target). Target applies at London wide level.</p> <p>14. Roads: TfL and boroughs are to bring all 'A' roads and busy bus routes up to serviceable standard – that is, a UK PMS score of 70 or below – by 2010. (New target, reflecting national target set by central government). Target applies at London wide and individual borough level.</p>	<p>EA Thames Catchment Flood Management Plans; and EA Thames Estuary 2100 Project.</p> <p>The Environment Agency is currently finalising its Thames Catchment Flood Management Plans (CFMP), the main aims of which are to:</p> <p>Through the CFMP the EA have recommend broad policies and approaches for the current and future management of flood risk. They have divided the</p> <p><b>Reflect in SA objective water and flooding.</b></p>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<ul style="list-style-type: none"> <li>• understand the factors that contribute to flood risk within a catchment, such as how the land is used;</li> <li>• recommend the best ways of managing the risk of flooding within the catchment over the next 50 to 100 years.</li> </ul> <p>Lambeth is also within the Environment Agency's Thames Estuary 2100 project, which covers future management of flood risk from the tidal Thames – from Teddington to the outer Thames Estuary. The objective of this work is to develop a tidal flood risk management plan for London and the Thames Estuary for the next 100 years.</p>	<p>Thames region up into 43 geographical areas called policy units. For each policy unit we have proposed a broad flood risk management policy and identified a range of approaches to deliver the selected policy. Most of Lambeth falls outside of these policy units as it is only subject to tidal flooding, however, parts of the south of the borough fall into policy unit 4 'Take further action to sustain current scale of flood risk into the future (responding to potential increases in flood risk from urban development, land use change, and climate change)'.</p>	<p><b>SA Objective Health and well being.</b></p> <p>This report's recommendations are based on these five principles.</p> <ul style="list-style-type: none"> <li>• Services focused on individual needs and choices. Provision should, wherever possible, be tailored to the particular needs of each individual. Patients should feel in control of their care and be able to make informed choices.</li> <li>• Localise where possible, centralise where necessary. Routine healthcare should take place as close to home as possible. More complex care should be centralised to ensure it is carried out by the most skilled professionals with the most cutting-edge equipment.</li> <li>• Truly integrated care and partnership working, maximising the contribution of the entire workforce. Better communication and co-operation is needed – between the community and the hospital, between urgent and planned care, between health and social care – to stop people from falling through the gaps. Care should be multidisciplinary,</li> </ul>
	<p><b>Health Care for London. A Framework for action. Second Edition.</b></p> <p>This report makes recommendations for change. It is based on a thorough, practitioner-led process, and rooted in evidence – gathered from a wide range of people and organisations from the world of healthcare and from the NHS's partners in local government and beyond, from thorough reviews of the literature and data, and from the use of a range of analytical modelling techniques. It also reflects a major exercise to hear what Londoners say they want from their healthcare system. It sets out a compelling ten-year vision for healthcare in London.</p>	

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
	<p>bringing together the valuable contributions of practitioners from different disciplines. The NHS should be committed to working in partnership with other organisations, including local government and the voluntary and private sectors.</p> <ul style="list-style-type: none"> <li>• Prevention is better than cure. Health improvement, including proactive care for people with long-term conditions, should be embedded in everything the NHS does. Close working with local authority partners is needed to help people stay mentally and physically healthy.</li> <li>• A focus on health inequalities and diversity. As discussed above, the most deprived areas of London, with the greatest health needs, need better access to highquality highquality healthcare. The whole thrust of this report is to tackle health inequalities by improving services across London, giving everybody access to the best possible care. Healthcare should be intelligently commissioned to tackle health inequalities. Preventative and outreach work should focus on the most deprived populations and new facilities should be located in the areas of greatest need. Improvements also need to take into account London's rich ethnic and cultural diversity. We are advocating that patients have more information to make choices about their care and this should be accessible to all.</li> </ul>	<p>Proposes seven models of provision for the future:</p> <ul style="list-style-type: none"> <li>• more healthcare should be provided at home</li> <li>• new facilities – polyclinics – should be developed that can offer a far greater range of services than currently offered in GP practices, whilst being more accessible and less medicalised than hospitals</li> </ul>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<ul style="list-style-type: none"> <li>• local hospitals should provide the majority of inpatient care           <ul style="list-style-type: none"> <li>• most high-throughput surgery should be provided in elective centres</li> <li>• some hospitals should be designated as major acute hospitals, handling the most complex treatments</li> <li>• existing specialist hospitals should be valued and other hospitals should be encouraged to specialise</li> <li>• Academic Health Science Centres should be developed in London to be centres of clinical and research excellence.</li> </ul> </li> </ul>	<p><b>Improving Londoner's Access to Nature – London Plan Implementation Report' (February 2008)</b></p> <p>Provides more detail on London Plan policies in relation to improving people's access to nature.</p> <p>To ensure Londoners have ready access to wildlife and natural green spaces, especially where there is an existing shortage of green space and in Areas for Deprivation or Regeneration.</p>	<p>Localities where people are further than 1 km walking distance from a publicly accessible Site of Borough or higher level of significance for nature conservation are defined as Areas of Deficiency in access to nature.</p> <p>Reducing the number of existing AODs in Lambeth</p> <p>Reducing the net area (m<sup>2</sup>) of existing AODs in Lambeth</p> <p>Alleviating deficiency in access to nature in Lambeth</p> <p>Increasing access to key Sites of Borough Importance for Nature Conservation in Lambeth</p> <p>Lambeth contains two Areas of Deficiency for Access to Nature for London (AODs) covering approximately 40% of the borough</p> <p>Lambeth has two London Priority Opportunity Sites for reducing AODs (Kennington Park and Norwood Park), and five Priority Sites for improving access to nature (Archbishop's Park, Brockwell Park, Myatt's Fields Park, Rush Common, Waterloo Millennium Green.</p> <p>Improving access to natural greenspace in Lambeth can be improved by:</p> <ul style="list-style-type: none"> <li>• Making places more attractive and safer, increasing information about and access to open spaces (especially in AODs).</li> <li>• Enhancing or creating new wildlife habitats and opening up access to existing habitats.</li> <li>• Wherever appropriate, new developments should include new or enhanced habitat or design (e.g. green roofs or walls) and landscaping which promotes biodiversity.</li> <li>• Improved standards of management to increase biodiversity value of existing/new open spaces</li> </ul> <p><b>SA Objectives: Regeneration and Efficient Use of Land; Liveability and Place; Biodiversity</b></p>

**Table A4 – Borough Level Policy**

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<p><b>The London Plan – Sub-Regional development framework for Central London May 2006</b></p> <p>The Sub-Regional Development Framework (SRDF) provides guidance on the implementation of policies in the London Plan in the <b>Central London</b> sub-region, which is formed by the boroughs of Camden, City of Westminster, Islington, Kensington and Chelsea, Lambeth, Southwark and Wandsworth.</p> <ul style="list-style-type: none"> <li>• Housing;</li> <li>• Employment and offices;</li> <li>• Industry and warehousing;</li> <li>• Retail;</li> <li>• Culture, leisure and tourism;</li> <li>• Night-time economy;</li> <li>• Social infrastructure; and</li> <li>• Utility and infrastructure services.</li> </ul>	<p>Key issues have been listed under the following criteria:</p> <ul style="list-style-type: none"> <li>• Housing;</li> <li>• Employment and offices;</li> <li>• Industry and warehousing;</li> <li>• Retail;</li> <li>• Culture, leisure and tourism;</li> <li>• Night-time economy;</li> <li>• Social infrastructure; and</li> <li>• Utility and infrastructure services.</li> </ul>	<p>The SA framework should include objectives relating specifically to the provision of affordable housing, employment, improving the walking environment and providing additional housing near work places, and increasing the population density only in well connected areas to encourage sustainable transport choices.</p> <p><b>SA Objectives: Housing; Employment; Access and services; Health and well being</b></p>
<p><b>Adopted UDP August 2007</b></p> <p><b>Vision:</b> To make Lambeth a great place to live, work and visit by promoting high quality, sustainable development. The spatial priorities for development, planning obligations and regeneration will be:</p> <ul style="list-style-type: none"> <li>• Maximising the opportunities for residents and others from Lambeth's location at the heart of a world city through improved employment opportunities, better public transport links and improved access on foot and by bicycle; and</li> <li>• Ensuring healthy, safe, inclusive, mixed, liveable and balanced communities – giving priority to protecting residential amenity, ensuring adequate provision of community facilities, providing more housing (in particular more affordable housing), protecting and improving Lambeth's heritage, character and open spaces, and the regeneration of Lambeth's most</li> </ul> <p>Strategic policies:</p> <ol style="list-style-type: none"> <li>A. The Council will ensure that all development proposals contribute to safer communities.</li> <li>B. Through the planning process, the Council will promote a healthy borough with better health care services, reduced health inequalities and reduced causes of ill health.</li> <li>C. The Council will make best use of the borough's limited land resources and will seek to encourage, through good design, higher densities and more mixed and intensive development in appropriate locations.</li> <li>D. The Council will seek the provision of at least 20,500 net additional homes over the period 2002-2016 (including 8,200 affordable dwellings).</li> <li>E. The Council will promote access for all sections of the community.</li> <li>F. The Council will integrate planning and transport decisions to reduce the overall need to travel.</li> <li>G. Through the planning process, the Council will seek to establish a safe, accessible and attractive transport network, and prioritise walking, cycling and public</li> </ol>		

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<p>deprived communities.</p> <p>Applications should be accompanied by adequate supporting information showing how the proposal contributes positively to sustainable design and construction objectives and comprehensively addresses any potential adverse environmental or other impacts, having regard to the policies of the plan. Planning obligations will be secured to mitigate any negative impact.</p>	<p>transport.</p> <p>H Through the planning process, the Council will sustain a diverse and strong local economy and maximise education, skills and training opportunities for Lambeth residents.</p> <p>I The Council will promote the viability and competitiveness of the borough's town centres and district centres.</p> <p>J Through the planning process, the Council will ensure that there are sufficient local facilities to meet community and cultural needs.</p> <p>K The Council will protect and enhance the borough's built and historic environment, promote better and more sustainable design of development, and protect residential amenity.</p> <p>L The Council will protect and enhance the borough's natural environment and biodiversity.</p> <p>M The Council will protect and enhance the borough's open spaces, and ensure that recreational, sporting and play needs are met.</p> <p>N The Council will minimise pollution and seek sustainable management of the borough's energy, water and other resources (including waste).</p>	<p>The SA framework should include objectives relating to climate change, water use and energy, and assess the ability of the Lambeth CS to encourage the incorporation of renewable energy technology, maximise energy efficiency and promote sustainable design of new-build developments.</p> <p><b>SA Objectives: Built and historic environment; Climate change and energy; water quality and resources; biodiversity.</b></p>
	<p><b>Sustainable Design &amp; Construction SPD July 2008</b></p> <p>Aims to provide interpretation and guidance about the implementation of policy aimed at securing the highest standards of sustainability (from the Council's UDP; and the London Plan).</p>	<p>All development proposals in Lambeth are expected to meet high sustainable design and construction standards in accordance with the planning policies in the UDP, the London Plan, and Government objectives. All planning applications should be submitted with a sustainability assessment. The sustainability assessment should explain how these standards will be met and how the proposed development incorporates the sustainability principles set out in this SPD.</p> <p>The Council aspires to BREEAM "Excellent" and seeks "Very Good" as a minimum standard.</p> <p>In line with the Energy Saving Trust's minimum</p>

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
	<p>recommendation, the Council seeks the achievement of Code Level 3 as a minimum standard and aspires to Code Level 4 in the majority of developments.</p> <p>UDP Policy 34 requires all major development of more than 1,000 square metres or providing 10 dwellings or more to incorporate equipment for renewable power generation so as to provide at least 10% of their predicted energy requirements. This should be assessed in terms of CO<sub>2</sub> emissions. The 10% predicted energy requirement be will be assessed in terms of carbon dioxide emissions as this is now the standard approach taken to this issues in national policy and by the Mayor of London. It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10% through on site renewable energy generation, Policy 4A.7 in the London Plan aims to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The Council encourages and supports this aim for all applications.</p>	
	<p>Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day.</p>	<p>Use of SUDS</p>
	<p><b>Guidance and Standards for Housing Development and House Conversions SPD (July 2008)</b></p> <p>Provides detailed guidance on housing and conversions</p> <p><b>Safer Built Environments SPD (March 2008)</b></p> <p>The promotion of safe, secure and accessible developments is a key part of the planning process. Lambeth Council is committed to securing the highest quality</p>	<p>E.g. for new houses, the minimum area required as private amenity/garden space is 30m<sup>2</sup> per house.</p> <p><b>SA Objective Housing.</b></p> <p><b>SA Objective Crime and safety.</b></p>

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
or urban design, layout and building design. A clear aim of new development should be to create a sense of place & ownership and to ensure public safety and security.		
<b>S106 Planning Obligations SPD (July 2008)</b>  Links Lambeth Sustainable Community Strategy (2008-2020) outcomes with planning obligations.	<b>Various SA Objectives, including objective Housing</b>	
<b>LBL Sustainable Community Strategy Our 2020 Vision (2008-2020)</b>  Vision: Lambeth is a diverse, dynamic and enterprising borough at the heart of London.	<p>Underpinning the vision are seven long term outcomes that this strategy will deliver. These are as follows:</p> <ul style="list-style-type: none"> <li>• Lambeth is a great place to do business with higher levels of investment and business growth</li> <li>• Greater wellbeing for households through higher numbers of residents in employment</li> <li>• Even more children and young people are on the path to success through the provision of good quality education, training and jobs which reduces the risk of exclusion and offending</li> <li>• Safe and cohesive places where people are empowered and have the confidence to play active roles in their communities</li> <li>• Improved health and wellbeing of people which enables them to live active and independent lives</li> <li>• Lower levels of poverty and social exclusion in Lambeth by helping more of our socially excluded adults into employment, education and training</li> <li>• Mixed and sustainable communities with an increased supply of new homes, improved existing dwellings and a high quality physical environment.</li> </ul>	<p>The SA framework should cover a broad range of sustainability topics, in particular in relation to maintaining sustainable communities. Establishing a sustainable community is influenced by a number of factors including accessibility to employment and also the quality of the built and natural environment</p> <p><b>Relevant to various SA objectives</b></p> <p>A number of indicators and targets are related to these statements, many of which are Lambeth LAA indicators/ targets. Many are not directly related to spatial planning. Some that are include:</p>

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<p><b>LBL. Lambeth's Housing Strategy Statement 2004-2007</b></p> <p>Lambeth's Housing Strategy sets out Lambeth's commitment to ensuring everyone in the Borough has access to a decent, affordable home.</p> <ul style="list-style-type: none"> <li>• Increasing the number of affordable homes delivered (gross)</li> <li>• Reducing the number of households living in temporary accommodation</li> <li>• Reducing per capita CO2 emissions in the local authority area</li> <li>• Reducing the percentage of non-decent homes (local PI)</li> </ul>	<p>The Strategy is based on a "housing needs survey of 2002", which showed that 21% of households (24,246) were living in unsuitable housing of which 57.2% require alternative housing to meet their housing needs. The largest problems identified were disrepair, overcrowding and lack of affordability. The survey estimated that 4,213 affordable homes are needed each year until 2009. The annual supply of social letted property to meet demand is 2,268, leaving a shortfall of 1,945 affordable homes a year.</p> <p><b>SA Objective: Housing</b></p>	

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<p>designated as an Opportunity Area in the London Plan.</p> <ul style="list-style-type: none"> <li>Residents in the south of the Borough, the majority of whom do not have access to a car and rely on public transport, face a number of difficulties in trying to undertake local trips or access central London. They are generally restricted to using buses, which are slow due to a lack of priority measures, and being focused on north-south radial routes do not adequately serve some of the housing estates.</li> </ul>	<p>for action away from the car and towards pedestrians and cyclists;</p> <ul style="list-style-type: none"> <li>parking plans to meet the indigenous needs of the area – that is those most closely associated with the essential operational requirement of approved land uses – but discourage commuter parking and other less essential car trips;</li> <li>safer routes to school and school travel plans;</li> <li>improve the accessibility of the Borough's transport system so that all residents and visitors can enjoy the benefits of living in, working in and visiting the capital;</li> <li>achieve the Mayor's objective of making London one of the world's most walking friendly cities by 2015;</li> <li>The Council supports the Mayor's target for 10% of all London trips to be made by cycle by 2010;</li> <li>The Council recognises that improving Air Quality is a core task. Lambeth fully support the development of the London Wide Emission Zone (LEZ) and will work proactively to implement it. The whole of Lambeth has been designated an Air Quality Management Area (AQMA) where the required standards for nitrogen dioxide and fine particles will not be achieved unless additional action is taken. The Lambeth Air Quality Action Plan identifies that London-wide measures such as the LEZ, congestion charging and fleet conversion are the measures most likely to achieve cost effective improvements in air quality in Lambeth;</li> </ul>	

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme <i><b>SD Objectives on water (12) and climate change (11).</b></i>
<p>A Level 1 SFRA was undertaken for the London Borough of Lambeth which identified the need for a Level 2 SFRA to analyse specific locations where development is proposed in areas at risk of flooding. SFRA Level 2 objectives:</p> <ul style="list-style-type: none"> <li>• An appraisal of the current condition of flood defence infrastructure and of likely future policy with regard to its maintenance and upgrade;</li> <li>• An appraisal of the probability and consequences of failure of flood risk management infrastructure, including an appropriate allowance for climate change;</li> <li>• Mapping to illustrate the distribution of flood risk across flood zones to enable a sequential approach to site allocation within flood zones;</li> <li>• Identify policies and practices required to ensure development satisfies the Exception Test;</li> <li>• Guidance on the preparation of FRAs for sites of varying risk across the flood zone.</li> </ul>	<p>In accordance with PPS25, a specific policy on flood risk should be included in the London Borough of Lambeth Core Strategy to ensure:</p> <ul style="list-style-type: none"> <li>• Development is located in the lowest risk area where possible;</li> <li>• New development is flood-proofed to a satisfactory degree and does not increase flood risk elsewhere;</li> <li>• Surface water is managed effectively on site.</li> </ul> <p>The Level 2 SFRA highlights high residual flood risk in the development opportunity area of Waterloo. Therefore a sequential approach needs to be undertaken as part of the masterplanning process for this area, to place higher vulnerability uses in lower residual risk areas.</p> <p>In order to promote good practice and encourage sustainable development the following measures could be used in development areas behind flood defences such as Waterloo and Vauxhall:</p> <ul style="list-style-type: none"> <li>• Redevelopment must ensure that residual flood risk is reduced in areas benefiting from flood defence measures through effective mitigation.</li> <li>• The natural floodplain must be used upstream and downstream of areas benefiting from flood defences in order to accommodate additional floodwater.</li> </ul>	<p>Numerous recommendations are made including:</p> <p>Sustainable Drainage Systems must be included in new developments where possible as a way to manage surface water.</p> <p>Flood risk assessments should be undertaken for all developments in Flood Zone 2 and 3. Sites in Flood Zone 1 also require flood risk assessments if they are residential developments sites greater than 0.5 ha or greater than 10 dwellings and commercial development sites greater than 1</p>

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<p>been provided for the tidal River Thames. The Level 1 SFRA identified the tidal and fluvial floodplains associated with the River Thames and River Graveneys. The flood zones for the River Graveneys are currently in draft as the River Wandle modelling (of which the River Graveneys is a tributary) is currently being finalised. Therefore development in this area should consult the Environment Agency for the most up to date information.</p> <p>The Level 1 and Level 2 SFRA reports should be used in conjunction with each other to provide a more detailed overview of the flood risks to the London Borough of Lambeth, to assist in the development of policies, strategic planning and flood risk management.</p> <p>Policy recommendations should be reviewed in line with the Core Strategy to ensure flood risk considerations are included as part of the LDF process and future strategic planning.</p>	<p>ha or with a floor area greater than 1000 m<sub>2</sub>, to ensure that flood risk is not increased to other properties due to increased site runoff;</p> <p>Runoff rates from new development on greenfield sites should be restricted to Greenfield runoff rates as required by the London Plan. The London Plan aims for an essential standard of 50%, and desirable 100% standard for attenuation of current runoff rates when considering redevelopment, including an appropriate allowance for climate change;</p>	<p>The SA framework should include objectives which address the need to reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.</p> <p>The baseline data collation process should also identify the main strategic transport links including roads, railway stations, airports and ports.</p>
	<p><b>CRP – Light at the End of the Tunnel Regional Policy</b></p> <p>Light at the End of the Tunnel (LET) is both a regeneration and a transport project, promoting growth and development of the area and creating safe transport routes. LET was launched by Cross River Partnership in 2002 to tackle the severing effect of the ten kilometre stretch of disused Victorian viaducts.</p>	<p>The SA framework should include objectives which address the need to reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.</p> <p>The baseline data collation process should also identify the main strategic transport links including roads, railway stations, airports and ports.</p>

<b>Primary objectives or requirements of the plan, programme or environmental objective</b>	<b>Key targets and/or indicators relevant to the plan or programme (if applicable)</b>	<b>How objectives might be taken on board in SA and/or plan/programme</b>
<b>Lambeth Open Space Strategy, 2004 (Updated 2007)</b>	The Strategy provided information on open space deficiency, areas of deprivation, open space accessibility and quality of the open spaces (based on a matrix of criteria). From the series of outcomes of the open space audit of the Borough, a list of priority open spaces for improvement were recommended.	The SA framework should include an objective relating the assessment of open space provision, and the protection of existing open spaces in the Lambeth CS.  <b>SA Objectives: Regeneration and efficient use of land; Liveability and place; Biodiversity.</b>
<b>Lambeth Biodiversity Action Plan 2005</b>	The BAP contains a set of action plans for named wildlife habitats and species which are important to Lambeth and the people who live and work in the borough.	Priority habitats: woodlands; tidal Thames; built environment; railway line sides; private gardens; ponds and open water; parks and greenspace; churchyards and cemeteries; allotments and community gardens; acid grassland.  Priority species: stag beetle; reptiles; mistletoe; house sparrow; crucian carp; blackbird; bats.
<b>Lambeth PCT strategies: Strategic Service Development Plan (2008/09 refresh); Operations Plan 2008/09, Promoting Mental Health and Wellbeing in Lambeth (2005), Lambeth Healthy Weight – Healthy Lives Strategy (2008-11) and Updated Estates Strategy (March 2008)</b>	The Strategic Service Development Plan (SSDP) reviews the health needs of the local population, and sets out a service vision to address these needs, and to inform the capital development programmes of the three PCTs (Lambeth, Southwark and Lewisham). Based on this analysis, the plan sets out priorities for the development of facilities to support primary care and other locally based healthcare services:	<p>Operations Plan Proposed local targets for 2008/09</p> <ol style="list-style-type: none"> <li>Tier 3 vital signs where LPCT is in the lowest decile VSC 12 : timeliness of social care assessments.</li> <li>LPCT local targets associated with delivery of the Lambeth Local Area Agreement. Discussions underway – to be confirmed in line with final LAA agreement – June 2008. Will include a number of national requirements/priorities (NI 55 (obesity primary school children), 112 (under 18 conception rate), 120 (all cause mortality &lt; 75s)) plus the PCTs contribution to indicators that contribute to the delivery of the overall LAA strategic theme of worklessness. Likely to include PCT targets related to the following NIs :</li> </ol> <ul style="list-style-type: none"> <li>• reviews the state of existing primary care and community based services, sets out the case for change. This</li> </ul> <p>In addition affordable housing is an important issue for PCT and NHS staff.</p>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<p>reflects a number of national policy initiatives, including the need to establish consistent standards of quality, to expand choice and flexibility and to devolve decision making to local level; and an expectation that primary care will play a larger role in managing demand through tighter referral thresholds and other measures to avoid hospital admission. The intention is that by providing a wider range of more locally based services in properly equipped buildings, inappropriate visits and admissions to hospital will be reduced.</p> <ul style="list-style-type: none"> <li>The local drivers for change include the need to respond to population changes, and to address the inadequacies in quality or location of some existing primary care premises.</li> <li>Sets out a service model for the provision of locally based services across the three boroughs.</li> </ul>	<p>independent living. NI 151 : Adults in contact with secondary care MH services in employment.</p> <p>With a likely link to the following Tier 3 vital signs indicators :</p> <p>VSC07 : Adults with learning disabilities in employment. VSC05 : Adults with learning disabilities in settled accommodation. VSC06 : Adults in contact with secondary care MH services in settled accommodation. VSC08 : Adults in contact with secondary care MH services in employment.</p> <p>3. LPCT local targets associated with delivery of Lambeth Commissioning Strategy Plan</p> <p>3.1. Tier three vital signs indicator targets VSC04 : Achieving independence through rehabilitation. VSC27 : Patients on a practice register with a HbA1c of less than or equal to 7.5%. VSC23 : Number of patients using a PCT supported CVD risk register.</p> <p>3.2. Locally identified indicators, where we wish to develop Lambeth specific indicators</p> <p>Psychological therapies: sessions offered by neighbourhood, waiting times by neighbourhood, take up rates by age, gender and ethnicity.</p> <p>End of life care: % of people dying at home where home is the preferred place of death..</p> <p>Delayed transfers of care: Delayed discharge target for adults and older people in a mental health inpatient bed who are fit for discharge.</p> <p>Alcohol: the numbers of patients assessed in primary care using the FAST tool.</p>	<p>Health service and facilities need to keep pace with population growth and demand.</p> <p><b><i>Health issues should be integrated into all SD objectives, where relevant. Has direct impact on SD objectives in relation to:</i></b></p> <ul style="list-style-type: none"> <li><b><i>Access to key services,</i></b> <ul style="list-style-type: none"> <li><b><i>including health services</i></b></li> <li><b><i>Transport and travel</i></b></li> <li><b><i>Health and wellbeing</i></b></li> <li><b><i>Safety and security</i></b></li> <li><b><i>Housing</i></b></li> <li><b><i>Employment</i></b></li> <li><b><i>Air quality</i></b></li> </ul> </li> </ul> <p>Lambeth PCT's vision for its Commissioning Strategy Plan is: <i>'Improving health throughout the diverse communities we serve and ensuring consistently high quality services.'</i></p> <p>To help define what is meant by health improvement and high quality services the PCT has articulated a number of strategic goals, underpinned by expected outcomes</p> <p>The Mental Health and Wellbeing Strategy sets out priorities in the form of 9 Directional Statements:</p>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<p>from both a population and a service perspective. The PCT's strategic commissioning goals are:</p> <ul style="list-style-type: none"> <li>• To improve health and well being and reduce health inequalities in the population of Lambeth.</li> <li>• To work collaboratively with partners to deliver integrated and seamless services for Lambeth residents.</li> <li>• To ensure the delivery of excellent, high quality, evidence based services that provide the right care at the right time in the right place.</li> <li>• To deliver patient centred services that are responsive to service users and local communities.</li> <li>• To improve the PCT's commissioning capability to deliver World Class Commissioning in Lambeth, and to ensure the delivery of a balanced budget, national and local targets and priorities.</li> </ul>	<p>Partnership Reducing stigma and discrimination Communities Children and young people Promoting mental health Employment practice Arts and creativity Spiritual and cultural values and Prevention of suicide</p>	<p>Focuses on 6 priorities: staying healthy, mental health, long term conditions, children and young people, sexual health and end of life care.</p> <p>Summarises the Healthcare for London strategic themes stating 'we believe a good fit and consistency with our own locally developed goals'.</p> <ul style="list-style-type: none"> <li>• <b>Reducing health inequalities</b></li> </ul>

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<ul style="list-style-type: none"> <li>• <b>Health improvement and well being.</b></li> <li>• <b>Regionalisation of relevant services.</b></li> <li>• <b>Localisation of relevant services.</b></li> <li>• <b>Personalisation of services.</b></li> <li>• <b>Development of integration and connected services.</b></li> </ul> <p>The Updated Estates Strategy gives an overview on the condition of Lambeth PCTs estate, including investment over 2007/08 based on the service vision and premises development opportunities as set out in the Strategic Service Development Plan (SSDP) 2005. It also looks forward to 2008/09, detailing investment priorities including planned disposals.</p> <p>The Mental Health Promotion Strategy sets out that Lambeth people and organisations want to take action to reduce the things in life that threaten mental health whether in the workplace, at school, in the community and at home. It suggests that people want to see change a change of culture across all aspects of community life and work whereby promoting mental health and wellbeing is part of everything we do; education, health and social care, policing, housing services, employment practice, provision of leisure services, regeneration activities and so on.</p>		

Primary objectives or requirements of the plan, programme or environmental objective	Key targets and/or indicators relevant to the plan or programme (if applicable)	How objectives might be taken on board in SA and/or plan/programme
<b>NHS Modernisation Initiative</b>	<p>The Modernisation Initiative is a major transformational project working in South London to improve healthcare services within the inner London boroughs of Lambeth and Southwark.</p> <p>At the heart of the Modernisation Initiative's improvement work is the involvement of service users and patients who have an active role in helping to shape services to better meet their needs.</p>	





# Sustainability Appraisal and SEA of London Borough of Lambeth Core Strategy

Sustainability Appraisal Report

Appendix 2 – Baseline Data

March 2009

March 2009

# **London Borough of Lambeth Local Development Framework Core Strategy**

## **Sustainability Appraisal Report**

A report by **CAG Consultants and ENVIRON** for London Borough of Lambeth

Written by: Joanna Peacock, Kaye Lyon, Chris Day, Emma Jones, Niall Machin and Denny Gray

Reviewed by: Johanna Curran

March 2009

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# Introduction

The baseline data presented in this appendix is reproduced from Appendix 2 of the London Borough of Lambeth Local Development Framework Core Strategy Sustainability Appraisal Scoping Report, which has been subject to a five-week consultation with statutory consultees (Natural England, the Environment Agency and English Heritage) and other key stakeholders. The consultation period ran from Monday 3 November to Monday 8 December 2008. CAG Consultants and Environ, under the guidance of Lambeth Borough Council have since taken on board, as appropriate, the comments received during this consultation period. This version of the Baseline Data reflects the changes made as a result of the consultation responses.

# Baseline Information

## Environmental Issues

### Climate Change

#### Greenhouse Gases

The Mayor's Climate Change Action Plan shows that since 1990, London's overall CO<sub>2</sub> emissions have decreased from just over 45 million tonnes / year to approximately 44 million tonnes / year in 2006. This is despite a rise in population of 0.7 million people, and a rise in employment of 0.4 million over the same period. This change is largely due to a halving of industrial emissions, as industrial activity has relocated to other parts of the UK or offshore, along with a significant shift in the UK's electricity generating mix, with a reduced contribution from coal and more from natural gas.

Energy use in existing homes is the largest single source of CO<sub>2</sub> emissions in London. The breakdown of emissions and energy consumption by fuel and sector shows that the majority of emissions from the domestic sector are from the use of natural gas, most likely used for space heating and cooling and hot water provision.

Compared with the domestic sector, a larger proportion of emissions in the commercial sector come from electricity usage. This is primarily due to greater energy consumption for purposes such as lighting and computing. Since current electricity provision has 125% higher carbon intensity than for heating, the carbon emissions from the commercial sector are amplified.

Unlike other sectors, transport emissions in London have stayed static since 1990 despite the rapid growth of London's population and economy. This is due to high long-term levels of public transport use and, since 2000, unprecedented investment in the public transport network, alongside the implementation of policies like the congestion charge to combat congestion and manage traffic.

The existing UK Government aspiration is a 60% carbon emission reduction from 2000 levels by 2050. To meet this target the Mayor's London Plan sets out the following interim targets for reductions in CO<sub>2</sub> from London as a whole:

- 15% reduction from 1990 levels by 2010;
- 20% reduction from 1990 levels by 2015;
- 25% reduction from 1990 levels by 2020; and
- 30% reduction from 1990 levels by 2025.

The latest findings from the Stern Review indicated that a 30% reduction in emissions by 2025 will not be sufficient to prevent catastrophic climate change. In response to the review the London Mayor has proposed a new target for London, to stabilise CO<sub>2</sub> emissions in 2025 at 60% below 1990 levels, with steady progress towards this over the next 20 years. This target is greater than the UK Government's current aspiration of a 60% reduction from 2000 levels by 2050.

Based on the projected population and economic growth for London, demand for transport will increase over the period to 2025. The State of Environment Report (SoE) predicts that without intervention, car kilometres in London could increase by as much as 8% and freight traffic rise by 30% from 2007 levels. Additional public transport capacity in the form of more buses and underground trains will also be needed to meet demand.

The SoE predicts that CO<sub>2</sub> emissions from ground transport could increase by 2 million tonnes to 11.7 million tonnes / year in 2025, an increase of nearly 25%. The Climate Change Action Plan sets out a series of measures to help combat CO<sub>2</sub> emissions from the transport sector, with priority focused on reducing emissions from car and freight traffic, as these represent nearly three quarters of emissions in this sector. Actions include a major programme of increased investment in public transport, promoting low-carbon vehicles and fuels and more widespread carbon pricing for transport.

The most common method used to travel to work in Lambeth is the underground. The second most common form of transport is private car, but the proportion is low when compared to the national level of private car commuting. Train and coach are the third most common method of work travel. The distance travelled to work data from the 2001 Census shows that in Lambeth the majority of people travel 5 km – 10 km which is slightly above the London average and about 10% above the national average. At the national level most workers travel between 2-5 km to work.

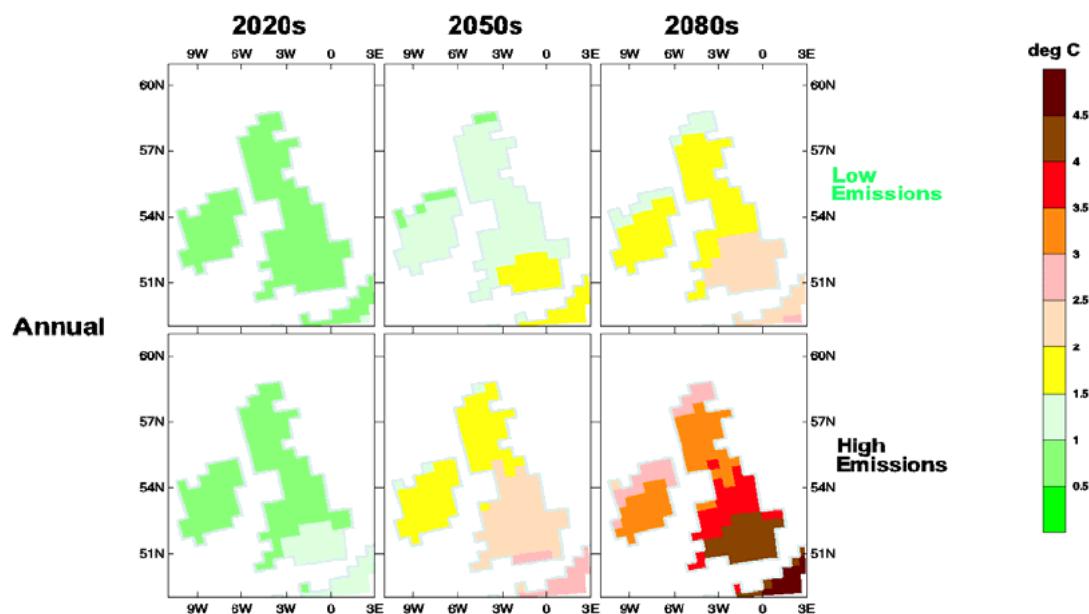
### **Implications of Climate Change**

The SoE identified the following key climate change impacts for London:

- higher average temperatures in summer and winter;
- wetter winters with more heavy downpours;
- drier summers and additional pressure on London's water resources;
- an increase in the intensity and frequency of extreme weather events such as heat waves; and
- tidal surges and torrential rain.

The South East of England is predicted to experience greater changes than the rest of the UK as its climate is affected by the European continental landmass as illustrated in the figure below.

### Predicted summer temperatures for the UK (UKCIP 02)



Issues relating to flooding are discussed in the Water section below.

### Key Issues

London Key Issue	SA Issue for Lambeth
Climate Change: carbon emissions are on the increase and could be exacerbated by the proposed level of growth if not managed in an appropriate way. Climate change could have severe ramifications for London's population, economy, wildlife, cultural heritage and material assets.	<p>Reducing CO<sub>2</sub> emissions (aim to stabilise CO<sub>2</sub> emissions in 2025 at 60% below 1990 levels)</p> <p>Implement measures to help Lambeth adapt to the consequences of inevitable climate change.</p>

### References

Greener London – The Mayor's State of the Environment Report (2007)  
<http://www.london.gov.uk/mayor/environment/soereport.jsp>

United Kingdom - 2001 Census

## **Water**

London has a good quality water supply. However, the effects of a changing climate, with reductions in river flows during summer periods and increased surface flooding, is likely to reduce the amount of water available for public water supply.

The natural recharge of aquifers from which groundwater is abstracted is likely to start later in the season, which may also impact on water availability. There will be a greater demand for water placed on the supply from the mains network, and therefore the environment.

The role of water in London's natural environment needs to be recognised to ensure water usage and wastewater disposal does not put excessive stress on water supplies or cause pollution, and that new developments do not compromise existing water and sewerage services.

### **Domestic water supply**

During most summers, there is sufficient water in the rivers Thames and Lee to meet London's demand for water. It is periods of low rainfall that threaten the security of supply which means restrictions such as hosepipe bans could be used more frequently or for longer periods. Low rainfall over the winter months limits the refill of groundwater stocks, which in turn lead to low river flows in the following spring and summer. Typically it takes two winters of below average rainfall to initiate drought actions, as was seen in the winters of 2004/05 and 2005/06.

80% of London's public water supplies come from the rivers Thames and Lee. The water companies store this water in reservoirs around the capital. The most significant reservoirs are in west London and in the Lee Valley. The remainder comes from water trapped in chalk layers under London and surrounding areas.

The Water Act 2003 requires all water companies to have sound drought plans, so that they can continue to supply water to their customers, when sources are depleted. In 2006, Thames Water, Three Valleys Water and Sutton & East Surrey Water all imposed hosepipe bans. In addition, Sutton & East Surrey restricted its customers' non-essential use of water through a drought order. These have subsequently been lifted following above average rainfall and recovery of groundwater levels.

Water consumption varies year-on-year depending on the weather e.g. in the drier, hotter summer of 2003 the demand for water rose above normal. Ignoring these annual variations, the longer-term trend paints another picture. From 1961 to the 1990s water consumption rose from about 90 litres per person per day to nearly 150 litres. Yet since the 1990s, water use has more or less stayed the same. In 2004/05 (no hosepipe ban in this period) each Londoner used on average 156 litres of water a day. This is only slightly higher than the national average but higher than most other north European cities.

The London Plan sets a target for maximum water use of 105 litres per person per day for residential development. However, it states that this will be reviewed in light of Code for Sustainable Homes targets, with a view to adopting an 'essential standard' of 80 litres/ person / day by 2016 at the latest.

## **Groundwater**

London's rising groundwater levels, which followed the cessation of large public abstractions from the 1950s onwards have, until recently, left London's underground infrastructure at a real risk from inundation. In 1999 the General Aquifer Research, Development and Investigation Team started to investigate how best to resolve the problem. It concluded that abstractions from London's groundwater should increase by 50 million litres of water a day. Since then, the Environment Agency has granted licenses to take the surplus groundwater. It is the EA's view that since groundwater levels appear stable, they no longer pose a significant threat to the underground infrastructure.

## **Flooding**

London is vulnerable to flooding from four sources:

- tidal Thames;
- fluvial tributaries to the Thames and the non-tidal Thames;
- surface water flooding from heavy rainstorms; and
- overflowing sewers.

Flood risk management is as a key issue for Lambeth. A large section to the north of the borough is located within Flood Zone 3a. Whilst this zone is namely with regards to tidal influences from the River Thames, the risk of flooding in the borough can occur from many sources: fluvial flooding from the main river Graveney in the south, tidal flooding from the river Thames, sewer flooding and surface water flooding. Often these types of flooding happen in combination and it is difficult to distinguish between the different types. The management of the drainage systems and associated flooding is the responsibility of several bodies, making the risks of flooding even more complex. The floodplain is defended by the Thames Barrier and built flood defences, but it is necessary to manage the residual risk of flooding (see annex G of PPS25 and its associated Practice Guide Companion) and flooding from other sources. The Environment Agency note:

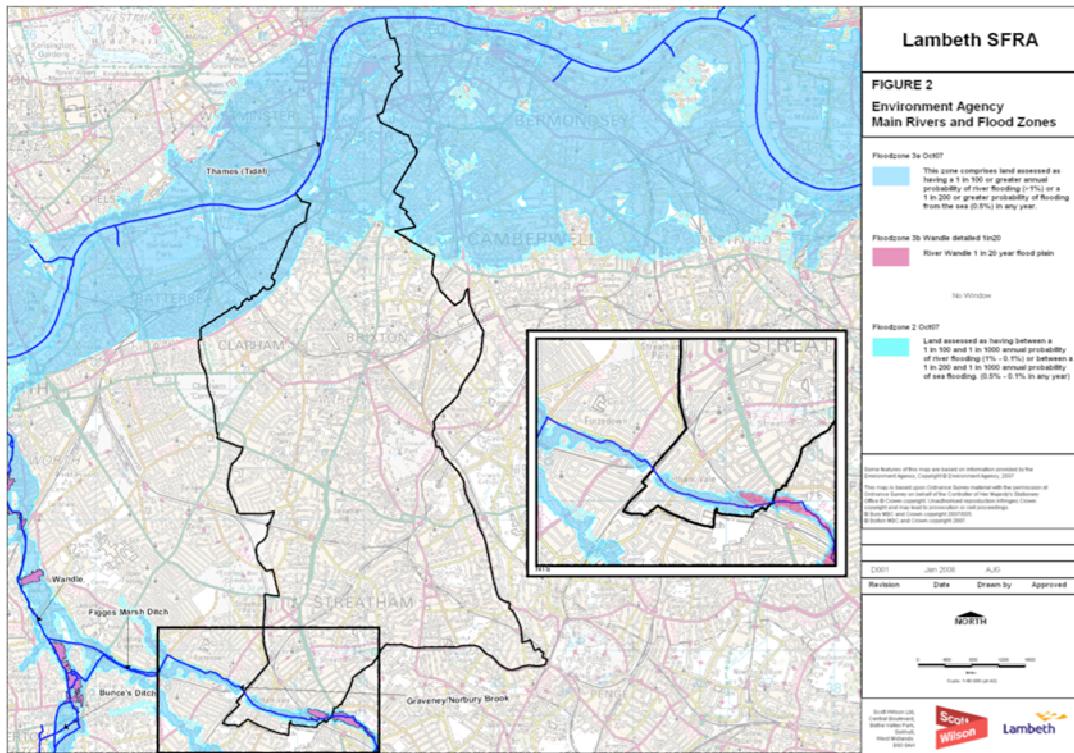
*'Whilst much of the Thames Tidal defences along these frontages in the borough are in relatively good condition there are sections with some defects. Remediation and improvements to the flood defence walls should be required when riparian sites are redeveloped'.*

Climate change will increase the probability of all these forms of flooding, whilst London's growth (more people, more assets and more valuable assets) will increase the consequence of any flood. The Thames Tidal Defences comprise the Thames Barrier, 185 miles of floodwalls, 35 major gates and over 400 minor gates. A significant part of London lies within the tidal floodplain, and if London did not have the current defences many of these areas would flood twice a day with every tide.

The likelihood of flooding by means of overtopping of the flood defences is considered to be 1 in 1000 (given their design height) however a breach of the defences within the area could potentially pose a significant threat and rapid inundation of the surrounding area.

The sort of tidal flood event that could seriously affect central London might occur in excess of a once in a 10,000-year return period. This is because whilst the walls and banks downstream of the barrier would have been over-topped, the defences upstream of the barrier would still be able to contain a large volume of water. The defences are well maintained and regularly inspected (the operational costs of Thames Tidal Defences is around £8m per year with about £5m annual capital investment on maintaining / enhancing defences) further decreasing the risk of failure.

The map below shows the areas in the Lambeth Borough which are at greatest risk of flooding.



Source: London Borough of Lambeth Level 1 Strategic Flood Risk Assessment

The rivers within the London boundary are predominantly urban rivers, which respond quickly to intense rainfall, but also fall again quickly when the rain ceases. The principal source of fluvial flooding in London is when intense rainfall in a short period overwhelms the drainage capacity.

The rapid rate of surface water runoff from hard surfaces of built-up areas exacerbates the problem. Many of the river channels in London have been modified or diverted, particularly through urban areas. They are typically straight concrete lined channels with many culverts. This often increases the rate of flow and decreases the time taken for water to travel through a catchment. Culverts and bridge crossings can cause restrictions to flow or be prone to blockage.

Managing flooding through spatial planning and allowing water to flow on to low-lying land can enhance the environment and recreation opportunities. This may include storing water in parks or playing fields, and allowing rivers and streams to revert to more natural courses, creating wetland and other habitats.

The London Plan seeks to ensure that surface water run off is managed as close to its source as possible and in line with the following hierarchy:

- store water for later use
- use infiltration techniques, such as porous surfaces in non clay areas
- attenuate rainwater in ponds or open water features for gradual release to a water course
- attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse
- discharge rainwater direct to a watercourse
- discharge rainwater to a surface water drain
- discharge rainwater to the combined sewer.

### **Key Issues**

<b>London Key Issue</b>	<b>SA Issue for Lambeth</b>
<b>Natural resources:</b> increasing demand on water arising from population growth and increased economic activity.	Efficient use and management of water: addressing increasing demand.  Manage the risk from flooding and surface water run-off.

### **Data Gaps and Assumptions**

Borough level information on mains water capacity and foul drainage issues.

### **References**

Greener London – The Mayor’s State of the Environment Report for London (2007)-  
<http://www.london.gov.uk/mayor/environment/soereport.jsp>

London Borough of Lambeth – Vauxhall Supplementary Planning Document, Sustainability Appraisal Scoping Report (January 2008).

London Borough of Lambeth – Level 1 Strategic Flood Risk Assessment (June 2008), prepared by Scott Wilson.

London Borough of Lambeth – Level 2 Strategic Flood Risk Assessment (August 2008), prepared by Scott Wilson.

Water Matters: The Draft London Water Strategy, 2007.

<http://www.london.gov.uk/mayor/environment/water/docs/la-draft-water-strategy.pdf>

## Biodiversity and Open Space

The Borough is home to many different plant and animal species, which use places like gardens, parks, allotments and railway linesides as 'habitats' for shelter, feeding and travel. All these wild plants, animals and habitats add to the biodiversity of Lambeth.

Many wild plants and animals found in Lambeth are common and easy to find; however, others are quite rare or under threat from habitat loss, inappropriate development, pollution or climate change.

Some of Lambeth's wildlife habitats are also abundant, like grassland and buildings, but others such as woods and ponds are not and have to be protected or carefully managed. If wildlife habitats are damaged or lost, then the many wild plants and animals that use them are also threatened or could be lost.

The Lambeth Biodiversity Action Plan (BAP) adopted by Lambeth Council in October 2005, is the Council's commitment to protect Lambeth's wildlife and biodiversity. The BAP contains a set of action plans for named wildlife habitats and species which are important to Lambeth and the people who live and work in the Borough. The habitats and species described in the BAP are either common but popular with the public, or are threatened and need urgent protection. These habitats and species are also 'flagships' which help to make people more aware of biodiversity and the needs of nature, to show what can be done to protect wildlife biodiversity in general, not just for those named in the BAP.

Lambeth also contains a number of wildlife habitats and species that are relatively uncommon in London or the UK, or are even declining in area or abundance due to changes in the way we manage the environment or other factors. Some of these rare or threatened habitats and species have important historical or social links with London and Lambeth, such as the house sparrow, or act as important 'indicators' of the health of our natural and physical environment, and so arresting or reversing their decline or loss could result in improvements to the quality of lives and that of future generations living or working in Lambeth.

The Biodiversity Action Plan (BAP) contains a set of action plans for named wildlife habitats and species which are important to Lambeth and the people who live and work in the Borough and include the following:

- Woodlands
- Allotments and Community Gardens
- Crucian Carp
- Tidal Thames
- The Built Environment
- Blackbird
- Railway Sidelines
- Ponds and Open Water
- Bats
- Private Gardens
- Parks and Green Spaces
- Stag Beetle

- Acid Grassland
- Churchyards and Cemeteries
- Reptiles
- House Sparrow
- Mistletoe

Acid grassland is a key habitat within the borough. It develops over acidic soils originating from sands and gravels that are freely draining and low in nutrients which are not only essential for many plants but also maintain an alkaline or neutral pH in the soils. There are a number of locations in Lambeth where the surface geology is dominated by sands and gravels, and where soils are 'acidic' as a result.

Acid grasslands in London are very important for their insect and spider populations, often colonised by distinctive groups of such invertebrates. This is due not just to the specific grass and nectar-rich flower species present, but also the loose and often bare soils, plus the dry and sun-exposed locations that acid grasslands are found in.

Prominent invertebrate species in acid grasslands include hole-nesting bees, wasps, many species of butterfly and moth, meadow ants, and birds such as meadow pipit, skylark and green woodpecker. The UK distribution of these species is restricted, and this unique assemblage, along with their association with acid grasslands, is termed the 'Thames Terrace Invertebrate Fauna'.

There are approximately 6 hectares of acid grassland in Lambeth, which is about 0.22% of the total land area of the Borough. The main site is Streatham Common (TQ 307 709), with minor areas at Eardley Road Sidings (TQ 292 703) and Peabody Hill (TQ 320 736). All three acid grassland sites are physically isolated from each other, with no 'green connections' between them, which restricts the opportunity for plants and invertebrates to move between sites.

Lambeth's three acid grassland sites are not only protected through inclusion in the Lambeth Unitary Development Plan (UDP) but also through notification as Sites of Importance for Nature Conservation (SINC) for the Borough. Streatham Common is also a Metropolitan Common and so the acid grassland is protected under legislation which confers protection for the whole of the Common. Eardley Road Sidings is a proposed Local Nature Reserve (LNR) and as such will be protected under the National Parks and Access to the Countryside Act 1947.

There are a number of BAPs for individual species. For example, London is nationally significant for the UK stag beetle population. Over 3,000 adult beetles were recorded in London during 1998 national survey records, which is approximately 30% of the total recorded British population. Stag beetles have been recorded across London, but key boroughs are Croydon, Lewisham, Bromley, Greenwich, Southwark, Lambeth, Bexley, Ealing, Hounslow, Richmond, Kingston, Merton and Wandsworth. The beetle is far more common in the South and West of London in areas like Beckenham, Dulwich, Wandsworth, and Richmond. Gardens seem to be the most important habitat for stag beetles in London and the same applies to Lambeth.

The reduction of dead wood habitat is a major threat to future stag beetle populations. Dead wood was once reduced through intensive management or loss of woodlands. Although some 'tidying up' still continues, site managers are now more aware of the need to retain dead wood as part of woodland ecosystems this will certainly benefit stag beetles. Changes in parks management in London has also led to retention of dead wood for landscape and nature conservation purposes. Habitat suitable for stag beetles has been steadily lost in London through suburban expansion in the inter-war years. Although the introduction of the Green Belt led to restrictions on suburban expansion, development will continue to result in the loss of stag beetle habitat, especially as there is a lack of awareness of the beetle's presence on sites. Stag beetles are very vulnerable to direct human impacts.

Bats are known to be in decline both nationally and at the London level. For example, at least eight bat species are known to breed in London. Pipistrelles (*Pipistrellus pipistrellus* and *Pipistrellus pygmaeus*) are the most abundant, occurring in all London Boroughs, and are known to be the commonest species in Lambeth. Noctule and Daubenton's bats are regularly recorded and known to be widespread, probably also in Lambeth. Little is known about the current status of bat species in Lambeth, although available evidence suggests an overall decline in London populations. A recent repeat bat survey in London found a statistically significant decline in the bat population of London since the mid-1980s. Both species of pipistrelle are thought to have declined by 70% between 1978 and 1993.

The declines have been attributed to a number of causes. For example, changes in land use can result in the loss of insect-rich feeding habitats such as wetlands, woodlands and grasslands. Disturbance to bat commuting routes to and from feeding areas and roosts, through loss of flight line features like green corridors, or introduction of features like artificial lighting is a major concern.

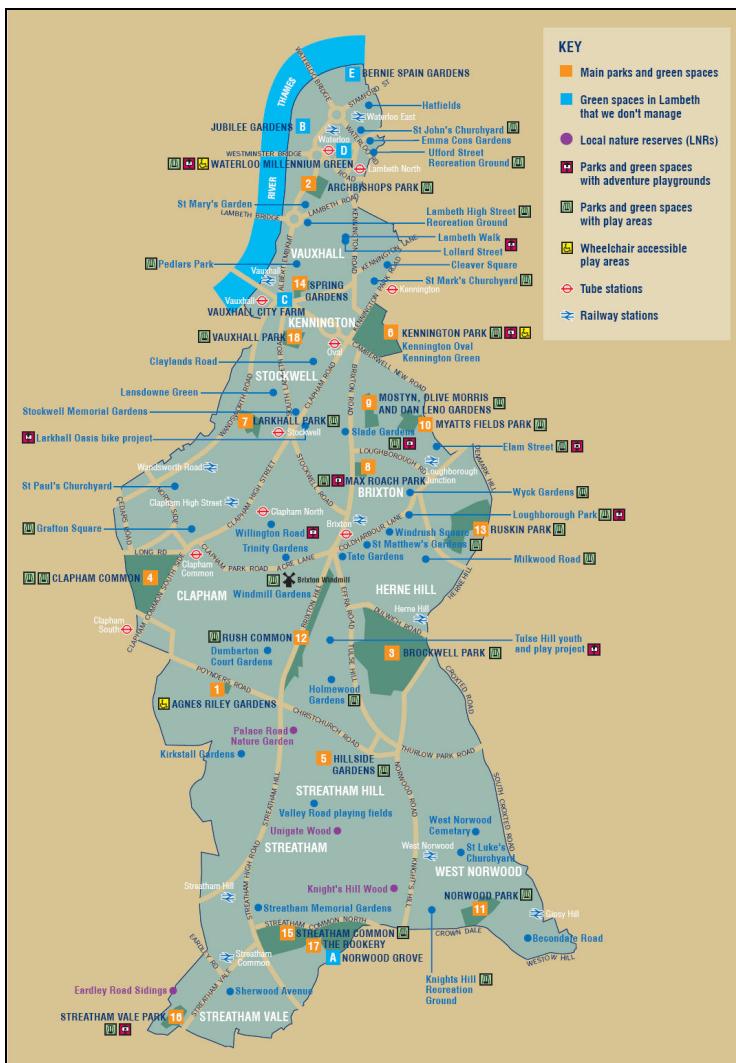
Similarly, the population of house sparrows both nationally and across London is in decline. The National Breeding Birds Survey showed a significant decline of 7% between 1994 and 2002 in Britain in house sparrow populations. Within London, the BBS decline was even more substantial, with a fall of about 70% from 1994-2002 the highest decline for any English Region. When the survey began in 1994 the house sparrow was the most numerous species in the London samples. By 1999 it had been overtaken by feral pigeon, wood pigeon, blackbird, carrion crow and starling. By 2002 statistics from the Common Birds Census and Breeding Bird Survey show that over 25 years the decline in the UK population of house sparrow had reached over 60% and the species was placed on the Red List of Species of Conservation Concern.

A reduction in insect food supply for young house sparrows in early spring may be a major factor in house sparrow decline. There is also a theory that lead-free petrol might contain chemicals which reduce the supply of aphids and other invertebrates. Changes in agricultural practice might affect London's house sparrow population especially in late summer/autumn, when birds leave nesting territories in residential areas and move off in flocks to more rural or suburban locations. Changes in

agricultural practice such as a switch to autumn sowing of cereals and lack of stubble may have some impact. In both London and the suburbs there has been a reduction in brownfield land in recent decades. Given the importance of wasteland in providing a resource for seed-bearing plants, there may be a net reduction in the available autumn seed supply at a critical time for house sparrows. House sparrow declines may also relate to recent increases in predation by sparrowhawk and magpie in cities and urban areas, however, no link has been proven. Another significant predator is the domestic cat.

Changes in availability of nest sites, driven by changes in roof design may be an issue in some areas of older housing undergoing renovation, as modern roof repairs prevent access to the roof space for birds. In addition, roofs are subject to pesticide treatment and this may also have an effect. Changes to gardens are probably an important factor in the decline of house sparrows as gardens are 'tidied up' and lost to provide parking. This means that there are fewer weedy corners providing seed food, and fewer old bushes and rambling ivy providing roosting cover and nest sites.

Lambeth has 64 officially designated 'parks and public greenspaces' which are managed by Lambeth Parks and Greenspaces Unit. These sites make up about 270 ha of the total land area for Lambeth which amounts to about 9.9% of the area of the Borough. There are also a number of small sites which, although privately owned, are managed as parks for the public to use and enjoy. The location of the green spaces and local nature reserves are shown on the map below.



All 64 parks and greenspaces managed by Lambeth Parks are protected from development or loss by inclusion in the Lambeth Unitary Development Plan (UDP), which also recognises the importance of parks and greenspaces for nature conservation and biodiversity.

Many of the larger parks are designated Metropolitan Open Land (MOL) or Urban Open Space, and a number of public gardens and squares in Lambeth are listed in English Heritage's register of historic landscapes.

Natural areas of woodland and scrub in parks and greenspaces have a poor public perception with concerns over personal security, especially for women and lone people. Long grass suggests neglect, poor management or an 'uncared for' attitude. People complain that long grass or scrub areas accumulate litter and hide dog or hazardous wastes, so the pressure to remove the perceived problem can obliterate or damage many natural areas. Many parks and greenspaces suffer frequent attacks from vandalism and dumping, which can impact upon wildlife areas, such as deliberate arson of meadow grassland. An annual resident's survey undertaken by Lambeth Council

shows that the resident satisfaction with open spaces has increased from 45% in 2003 to 64% in 2007. Satisfaction levels for Lambeth remain consistent with rates for London as a whole (63%) and inner London boroughs (67%).

Dumping or disposal of garden or horticultural waste can introduce invasive or alien plants, like Japanese Knotweed, Giant Hogweed, Sycamore, Rhododendron, Cherry Laurel or Buddleia, to parks and greenspaces. These dominate indigenous wild plant species or shade out the normal ground flora, so affecting species richness and distribution in the open space.

Many of Lambeth's parks and greenspaces are also within Conservation Areas, and this confers protection from inappropriate developments, both surrounding and within the open space, some of which could adversely affect their landscape and nature conservation value. Many parks and open spaces in Lambeth are also Sites of Importance for Nature Conservation (SINCs), which both recognises their importance for biodiversity and people's access to wildlife, and also confers protection to these sites from loss or inappropriate use or development through the Lambeth UDP.

Based on the information from the BAPs, the greatest threats to the quality of open spaces and biodiversity appear to come from unsuitable management regimes, vandalism, pollution, loss of habitat and habitat fragmentation.

### **Key Issues**

<b>London Key Issue</b>	<b>SA Issue for Lambeth</b>
<b>Natural resources:</b> pressure on biodiversity and open space arising from population growth and increased economic activity.	Pressure on biodiversity and open spaces. Habitat fragmentation / opportunities increasing habitat connectivity.

### **Data Gaps and Assumptions**

Status of bat populations within Lambeth.

### **References**

Lambeth Map of Parks and Green Spaces –

<http://www.lambeth.gov.uk/NR/rdonlyres/6D36C076-AD17-422C-BD42-ADFF45625894/0/BoroughMapOfParksAndGreenSpaces0505.pdf>

Lambeth BAPs –

<http://www.lambeth.gov.uk/Services/Environment/ParksGreenSpaces/BAPdocuments.htm>

Connecting with London's nature: the Mayor's Biodiversity Strategy, 2002.

[http://www.london.gov.uk/mayor/strategies/biodiversity/docs/strat\\_full.pdf](http://www.london.gov.uk/mayor/strategies/biodiversity/docs/strat_full.pdf)

## **Waste**

London's households produced 3.326 million tonnes of waste in 2005/06, which is enough to fill an Olympic-sized swimming pool every hour. This, together with just under another million tonnes (0.886 million tonnes) of waste collected from businesses, litter and from municipal parks and gardens, is managed by London's waste authorities and is called municipal waste. 64% of municipal waste was buried in landfill sites and 18% was burnt in incinerators in 2005/06, both of which have negative effects on the environment.

London's municipal recycling performance has improved since the last SoE report in 2003. However, it was not enough to ensure that London met the national household waste recycling target of 25% in 2005/06.

The way in which London's waste is managed and how Londoners use resources has a huge impact on London's contribution to climate change because of the emission of greenhouse gases from landfill and incineration and from the transportation of waste and recycled materials.

Managing waste sustainably within London will require significant infrastructure development. The development of the green industries sector will lead to new training and employment opportunities for Londoners and contribute to London's sustainable economic growth. Additionally, the provision of an extended and consistent recycling service across London is a key part of creating a more equal and inclusive capital.

London's present capacity for managing municipal waste within London itself is small. Of the municipal waste landfilled in 2005/06 (2.7 million tonnes) over 82% (2.2 million tonnes) was deposited in landfill sites outside the Greater London area, predominantly in the East and South East of England with just 16% (0.44 million tonnes) being landfilled in sites within London.

The table below shows the trends in municipal waste arisings between the periods 2000/01 and 2005/06.

Thousand tonnes (% of MSW total)							
Household waste from:	2000/01 (%)	2001/02 (%)	2002/03 (%)	2003/04 (%)	2004/05 (%)	2005/06 (%)	% change 2000/01 to 2005/06
Regular household collection	2,231 (50)	2,262 (51)	2,216 (50)	2,201 (51)	2,081 (48)	2,112 (50)	-5
Other household sources	336 (8)	310 (7)	298 (7)	274 (6)	306 (7)	277 (7)	-18
Reuse and Recycling Centres	520 (12)	519 (12)	497 (11)	411 (9)	328 (8)	250 (6)	-52
Household recycling	304 (7)	317 (7)	367 (8)	445 (10)	581 (13)	687 (16)	+126
<b>Total household</b>	<b>3,390 (76)</b>	<b>3,408 (77)</b>	<b>3,379 (76)</b>	<b>3,331 (77)</b>	<b>3,297 (75)</b>	<b>3,326 (79)</b>	<b>-2</b>
Non household waste	1,008 (23)	996 (22)	1,024 (23)	962 (22)	1,011 (23)	810 (19)	-20
Non household recycling	40 (1)	33 (1)	43 (1)	49 (1)	62 (1)	76 (2)	+90
<b>Total municipal waste</b>	<b>4,438 (100)</b>	<b>4,438 (100)</b>	<b>4,446 (100)</b>	<b>4,342 (100)</b>	<b>4,370 (100)</b>	<b>4,213 (100)</b>	<b>-5</b>

Source: Greener London (2007)

The quantity of materials collected from households for recycling has increased significantly – by 126% between 2000 and 2005. However, 22 of London's 37 waste authorities failed to achieve their statutory household recycling targets and, collectively, London failed to achieve the national household recycling target of 25% in 2005/06. The statutory target for recycling in the Lambeth Borough was 14% in 2003/04 which was met. The target for 2007/08 has been set at 21%.

Several local authorities are already taking active steps to help householders reduce waste; running schemes such as offering subsidies or awards for not using disposable nappies and running waste exchange programmes. Such schemes are an important way of minimising waste arisings in accordance with the waste hierarchy.

The introduction of improved and extended services has contributed to the increase in recycling, as well as awareness raising campaigns encouraging Londoners to recycle more, which is an encouraging sign of progress towards sustainable waste management. However, taken overall waste continues to grow nationally at about 2% each year.

The table below shows the methods of waste management used in London. It shows that the majority of waste is still being landfilled. London's use of incineration with energy recovery has remained stable with an average of 19%. This figure is higher than UK average of 9% over the same period. The amount of waste being recycled or composted is increasing. However, London's recycling performance was the lowest in the English regions in 2005/06.

## Municipal waste management method from 2000/01 to 2005/06 (London)

Method	Tonnes of Waste					
	2000/01	2001/02	2002/03	2003/04	2004/05 <sup>1</sup>	2005/06
Landfill (percentage)	3,207 72%	3,244 73%	3,163 71%	3,021 70%	2,856 65%	2,692 64%
Incineration with energy from waste (percentage)	886 20%	842 19%	872 20%	826 19%	869 20%	767 18%
Incineration without energy from waste (percentage)	1 0%	2 0%	1 0%	1 0%	1 0%	0 0%
Recycled/composted (percentage)	344 8%	351 8%	410 9%	494 11%	643 15%	763 18%
<b>Total<sup>23</sup></b>	<b>4,438</b>	<b>4,438</b>	<b>4,446</b>	<b>4,342</b>	<b>4,370</b>	<b>4,223</b>

### Key Issues

London Key Issue	SA Issue for Lambeth
<b>Waste:</b> Significant challenges to raise the level of recycling and self-sufficiency for waste disposal from the very low base in 2000. The challenge of maintaining a vibrant retail sector, whilst ensuring that the ethos of sustainable consumption is adhered to, including providing for new directives on waste disposal.	Efficient management of waste: increasing recycling rates and self-sufficiency in waste disposal.  Provision of sufficient waste management facilities to meet Mayor's waste apportionment for Lambeth.

### Data Gaps and Assumptions

None identified.

### References

Greener London – The Mayor's State of the Environment Report for London (2007)-  
<http://www.london.gov.uk/mayor/environment/soereport.jsp>

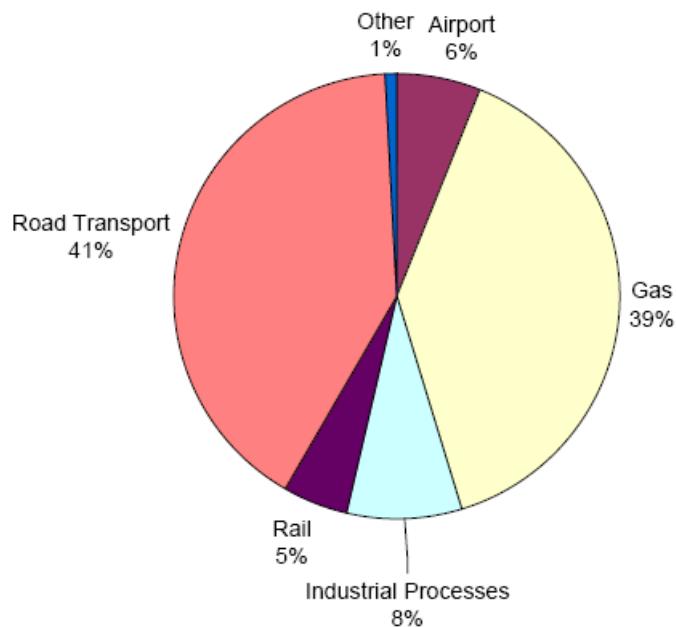
London Borough of Lambeth -  
<http://www.capitalwastefacts.com/LondonFacts/NewAuthorityFactFiles/LondonBoroughofLambeth/tabid/124/Default.aspx>

### Air Quality

Road traffic is the primary cause of air pollution in Lambeth, as well as the rest of London. The vehicle emissions of greatest concern are nitrogen dioxide, fine particulates (PM<sub>10</sub>), carbon monoxide and volatile organic compounds (VOC's) such as benzene. High levels of any of these pollutants can affect health, making breathing problems, such as asthma, and heart problems worse.

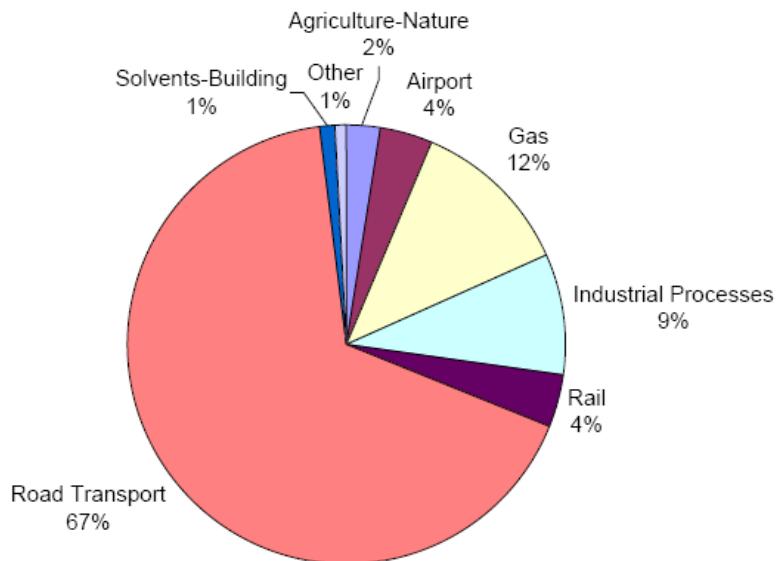
An inventory of all air pollution emissions in London was compiled by the London Research Centre. The inventory estimates that vehicles in Lambeth emit over 20,000 tonnes of the above pollutants every year. This represents 90% of air pollution emissions in the borough. In addition vehicles in Lambeth create nearly a quarter of a million tonnes of the greenhouse gas carbon dioxide which contributes to global warming. The sources of NO<sub>x</sub> and PM<sub>10</sub> emissions in greater London are presented below.

### **NO<sub>x</sub> emission sources in Greater London 2003**



*Source: London Atmospheric Emissions Inventory 2003  
(GLA)*

### **PM<sub>10</sub> emission sources in Greater London 2003**



*Source:* London Atmospheric Emissions Inventory 2003  
(GLA)

The broad trends in annual mean concentrations of air pollutants between November 1996 and November 2006 are:

- NO<sub>x</sub> concentrations declined by around 37% and NO<sub>2</sub> concentrations fell by 13%
- O<sub>3</sub> concentrations rose by 50%
- PM<sub>10</sub>, CO and SO<sub>2</sub> concentrations decreased by 24%, 64% and 75% respectively, with the greatest reductions occurring prior to 2000.

Trends during the last 11 years show reductions in concentrations of many pollutants, apart from ozone (which is a long distance pollutant and is affected by levels in Europe). Although recent trends in air quality show that concentrations of key pollutants have reduced in the last 10 years, it is important to recognise that air quality in London continues to breach the EU and national health-based targets and to affect Londoner's health and quality of life.

Modelled air quality for NO<sub>2</sub> and PM<sub>10</sub> for 2003 is shown on the maps below. Areas that exceed the National Air Quality Strategy Objectives are shown in yellow and red. The maps for both pollutants show predicted reductions in areas of excess, but some areas still exceed the objectives particularly near busy roads, in central London and around Heathrow Airport.

**Map of the modelled annual mean NO<sub>2</sub> concentrations (g/m<sup>3</sup>)<sup>8</sup> in 2003, compared to the National Air Quality Strategy Objective of 40 g/m<sup>3</sup> (applicable from 2005)**

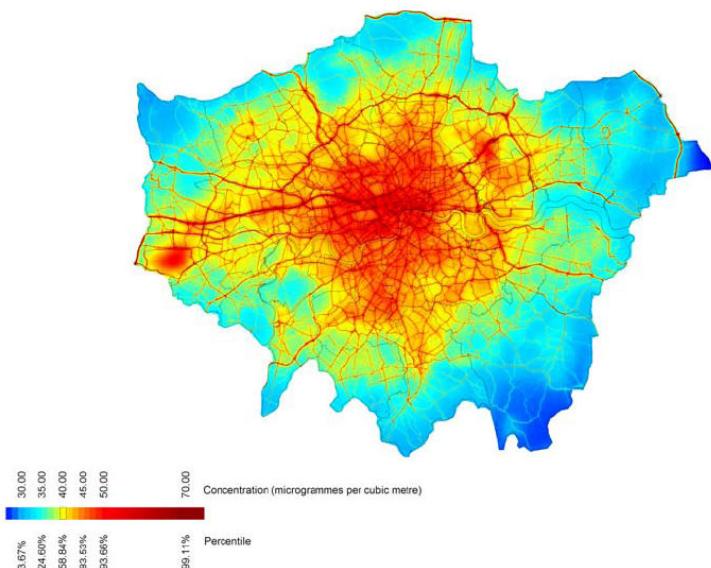


Figure 4. 6

Source: LAEI 2003, GLA 2006, OS data © crown copyright. All rights reserved (GLA) (LA100032379)

**Map of the modelled number of excesses (days) above the daily mean PM<sub>10</sub> concentrations of 50 g/m<sup>3</sup> in 2003, compared to the National Air Quality Strategy Objective, which allows 35 excesses (applicable from 2004)**

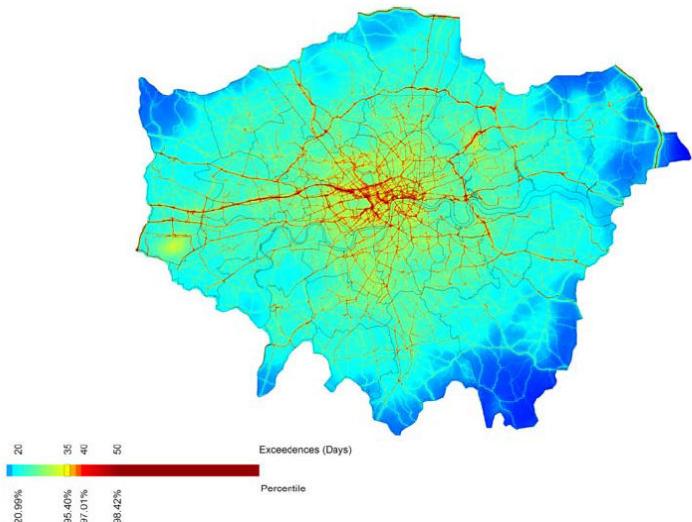


Figure 4. 8

Source: LAEI 2003, GLA 2006 OS data © crown copyright. All rights reserved (GLA) (LA100032379)

Lambeth Council has been monitoring air pollution throughout the borough since 1993. In addition, the Council operates five continuous air quality monitoring stations which monitor for nitrogen dioxide ( $\text{NO}_2$ ), sulphur dioxide, fine particulates ( $\text{PM}_{10}$ ) and carbon monoxide (at one site only).

In order to tackle the problem the Council has been carrying out a detailed air pollution study of the whole borough. The review and assessment of air quality in Lambeth looked at the pollution monitoring results, for seven key pollutants, from a large number of sites across the borough and the whole of London. This information together with data on traffic levels and weather conditions was used to predict future air pollution levels in the borough. The results showed that, despite improvements in air quality in Lambeth over the next 4 to 5 years, two pollutants, nitrogen dioxide and fine particulates, are likely to fail Government targets. Similarly, London is predicted to fail the European limit values for  $\text{PM}_{10}$ ,  $\text{NO}_2$  and Ozone ( $\text{O}_3$ ).

The most recent air quality monitoring report produced by Lambeth Council found that in 2006 there were, as in previous years, a number of pollution incidents recorded over Greater London as a whole. The United Kingdom Automatic Urban and Rural Network (AURN) of air pollution monitors measured high levels of air pollution across Southern England during June and July 2006. This was due to record-breaking levels of sunshine and temperature that together resulted in the formation of higher than average ozone and nitrogen dioxide concentrations. A further spell of fine weather in September and October also led to several clearly definable pollution episodes. However not all of the 15 total recorded episodes over London impacted at each of the Lambeth air quality monitoring sites.

The air quality monitoring report concludes that the Borough continues to suffer from high levels of  $\text{PM}_{10}$  and  $\text{NO}_2$ . Although roadside  $\text{NO}_2$  levels show some signs of improvement the 2006 data point to possible increasing levels borough wide. The main 2006 findings are summarised below:

- average  $\text{NO}_2$  levels exceeded the Government's targets at all 3 of the Lambeth automatic road and kerbside sites as well as at Crystal Palace which is close to the Borough boundary on Crystal Palace Parade. The  $\text{NO}_2$  standard was exceeded by a very significant margin at the Lambeth 4 site which recorded the highest number of exceedances for  $\text{NO}_2$  within the whole of the London Air Quality Network. Nitrogen Dioxide was also monitored using diffusion tubes at 15 sites in the Borough. 8 of these sites had concentrations that exceeded the annual average air quality objective. Overall 2006 concentrations were slightly less than recorded for 2005 but the results point to a trend in increasing levels of  $\text{NO}_2$  borough-wide;
- the results for  $\text{PM}_{10}$  show little change for the automatic monitoring stations with the Lambeth 4 kerbside sites again failing to meet the Government's targets. However, the 2006 results continued a trend of year on year decreasing concentrations; the number of days exceedance of the 24 hr mean standard reducing by 47% when compared to the 2004 result. Annual mean levels at the Lambeth 4 monitoring sites

also shows a slow year on year decrease although the 2006 levels were still significantly above the 2010 target levels.

- O<sub>3</sub> was monitored using diffusion tubes at 2 of the 15 sites in the Borough. Average 2006 results showed a slight decrease in 2005 levels to 34µgm/m<sup>3</sup> and were well within the annual mean EC levels for information and warning.
- Carbon monoxide was monitored at the Crystal Palace automatic station. Levels continued to be low and well within the 8hr rolling average limits set by the Government.
- Sulphur Dioxide was monitored at all the Lambeth automatic stations as well as at the 15 diffusion tube sites. 2006 levels remained low and the national objectives were met at all of the automatic monitoring stations. The diffusion tube sites met the EC target values for the protection of ecosystems from Sulphur Dioxide.
- Benzene was monitored at all 15 diffusion tube sites across the Borough. Concentrations were within the national objectives. Concentrations were slightly higher overall than in 2005 but the overall trend is a decline in levels of benzene since monitoring began in 1997, which reflects the national pattern.

In April 2007, 75% of London (1,175 km<sup>2</sup>) was covered by Air Quality Management Areas (AQMA). This compares to approximately 50% of London (770 km<sup>2</sup>) being covered in AQMAs in 2003.

In 2001 Lambeth declared an initial AQMA for the northern part of the borough for NO<sub>2</sub> (both the annual mean and hourly mean objectives were found to be regularly breached) as well as PM<sub>10</sub> (24 hour objective only). By 2003, it had become clear that predicted improvements in motor vehicle engine emission technology were unlikely to give the benefits originally anticipated. In 2003 Lambeth undertook its Stage 4 Review and Assessment of local air quality which indicated a likelihood of national air quality objectives continuing to be exceeded. As a result the whole of the Lambeth borough area was declared an AQMA (for the NO<sub>2</sub> annual mean objective only). Lambeth is not the only borough which is wholly covered by an AQMA, other boroughs that were declared AQMAs since 2003 are shown on the map below.

## Location of Air Quality Management Areas declared in London (as of April 2007)



Source: <http://www.london.gov.uk/mayor/environment/soereport.jsp>

### Key Issues

London Key Issue	SA Issue for Lambeth
<b>Air Quality:</b> London still suffers from some of the worst air quality in the UK and is in breach of two EU targets.	Improving air quality (and meeting EU targets).

### Data Gaps and Assumptions

None identified.

### References

Greener London – The Mayor's State of the Environment Report for London (2007).  
<http://www.london.gov.uk/mayor/environment/soereport.jsp>

Lambeth Borough Council-

<http://www.lambeth.gov.uk/Services/Environment/Pollution/Air.htm>

Annual Air Quality Report 2007 -Lambeth Borough Council -  
<http://www.lambeth.gov.uk/NR/rdonlyres/ABE39C5E-EA6F-4FD2-831E-5AB5FB9D06F5/0/AirQualityReport2007.pdf>

London Atmospheric Emissions Inventory 2003 (GLA)

## **Energy**

London uses as much energy as some whole countries, for example Greece, Portugal and Ireland. The Energy Strategy produced by the Mayor of London aims to move away from 'dirty' power supplied by fossil fuels, towards a greater use of renewable energy, such as solar energy, wind power and other clean sources.

Climate change is affecting and will continue to affect London, as summers become hotter and drier and winters become wetter. In addition, the chances of London flooding will increase over the coming decades, particularly in the area around the Thames. The Mayor's Energy Strategy is committed to delivering the Energy White Paper target of reducing carbon dioxide emissions by 60% by 2050.

The way the UK's energy is supplied is changing. Over the past few decades, and the last ten years in particular, there has been a move in the UK away from electricity generators that use solid fuels and oil. There has been a corresponding shift towards natural gas and an increase in the use of nuclear fuel. This trend has led to a significant decrease in the carbon intensity (the average amount of carbon emitted when a unit of energy is consumed) of energy used in the UK.

Between 1965 and 1999, energy consumption in Greater London increased overall by around 16%, despite a net fall in population of 7%. The per capita rate of energy consumption has risen significantly. London's population has been growing again since 1983 and it is now growing faster than in the UK as a whole. This is driving increases in energy consumption in domestic buildings, offices, and the transport system that outstrip the national rate of growth in energy demand. There are no signs of this growth slowing: projections in the London Plan indicate a net population increase of some 800,000 people (equivalent to a city bigger than Leeds) by 2016.

Without concerted action to reduce both the carbon intensity of energy and the amount of energy consumed, it is likely that carbon dioxide emissions from London will only continue to decline until 2005, and will then start rising again.

One of the most important issues resulting from current energy supply and consumption patterns is climate change. Climate change is discussed in the section above and so is not covered in further detail in this section.

Fuel poverty represents a critical social problem associated with energy use. A significant number of people in London and the UK have to spend a large part of their income on energy for their home. As a result, many are unable to maintain healthy

indoor temperatures. Households in this situation are defined as 'fuel-poor', and in 1996, this applied to at least one in six of households in the capital.

Fuel poverty is caused by a combination of low income, poorly insulated and/or under-occupied housing, inefficient heating equipment, and energy pricing and payment structures that tend to penalise consumers who use less energy. Living with temperatures below the recommended minimum can damage people's health and even result in death. These risks are greater for people on lower incomes, children, older people, and people with disabilities. Of the 70,000 deaths that occur in London each year, some 6,000 more occur during the winter than would otherwise be expected. Fuel poverty also affects the wider community, as it can increase health expenditure and damage local economies. The Mayor has defined an Energy hierarchy:

- use less energy;
- supply energy efficiently; and
- use renewable energy.

Maximising the use of renewable energy conserves natural resources, and reduces the amount of carbon dioxide released when energy is used. Finally, by supplying the remaining energy demand efficiently, for example from combined heat and power, the use of fossil fuels is minimised, further reducing overall carbon dioxide emissions.

The Mayor believes that there should be at least one zero-carbon development in every London borough by 2010. To achieve this, he expects each borough to identify at least one suitable site for such a development, use their powers as landowners or partners with others to bring about its development, and include the identified sites in their Development Plan Documents.

A significant number of homes in London are very energy inefficient, as reflected in their low SAP (standard assessment procedure) ratings. 16% of London homes have a SAP rating of less than 30. However, the Mayor wants there to be no occupied dwelling in London with a SAP rating of less than 30 by 2010, and less than 40 by 2016.

The commercial and public sectors account for approximately 30 per cent of London's energy consumption and carbon dioxide emissions. New offices and retail outlets tend to require more energy than older buildings, owing to higher levels of illumination and air conditioning. Growth in new office space in London remains prolific, so that the energy efficiency of new buildings affects London's overall office energy demand. However, new buildings can incorporate natural lighting and ventilation, and efficient supply technologies such as combined heat and power, to contribute to reducing energy demand further cost-effectively.

The Mayor's Energy Strategy states that a huge opportunity exists for London to obtain heat and power, by using urban renewables across the capital and purchasing green

power generated outside the capital. The Mayor wants renewables to make a major contribution to London's future economy and energy supply mix.

London should aim to generate at least 665 GWh of electricity and 280 GWh of heat, from up to 40,000 renewable energy schemes by 2010. This would generate enough power for the equivalent of more than 100,000 homes and heat for more than 10,000 homes. To meet this target, London should aim to install at least 7,000 (or 15 MW peak capacity) domestic photovoltaic installations; 250 (or 12 MW peak capacity) photovoltaic applications on commercial and public buildings; six large wind turbines; 500 small wind generators associated with public or private sector buildings; 25,000 domestic solar water heating schemes; 2,000 solar water heating schemes associated with swimming pools; and more anaerobic digestion plants with energy recovery and biomass-fuelled combined heat and power plants. These capacities should then be at least tripled by 2020.

The previous SoE report (2003) provided details on renewable energy capacity and output for renewable electricity and heat for the year 2001 which stood at 158000 MWh electricity and 46,300 MWh heat. The latest statistics, reproduced in the table below, indicate preliminary data for renewable energy capacity and output as at March 2007. New technologies included in the latest survey include micro-wind, biomass and commercial and domestic heat pumps.

	2001	2007	2001	2007	2001	2007	2001	2007
Technology	Output Electricity (MWh)		Output Heat (MWh)		Capacity Installed (MW <sub>e</sub> )		Capacity Installed (MW <sub>t</sub> )	
PV <50kWe	338 (combined)	3,086				4.101		
PV >50kWe		80				0.114		
Solar heating			3,840	4,305- 14,985				10.683- 37.464*
Biomass				3,979				0.2
Biodegradable fraction of MSW incineration	256,000	302,610				64		
Sewage Sludge Incineration	44,900	47,071				17.3		
Small/Micro Hydro	44							
Landfill Gas	64,000	119,358				18.182		
Sewage Gas	49,000	21,102	42,500	30,600		6.78		14.571
Wind <50kWe	0.2	255				0.083		
Wind >50kWe		9,466				3.6		
Commercial and Domestic Heat Pumps				180				0.079
Total excluding MSW** incineration	158,300	200,418	46,300	39,063 – 49,744		50.397		25.533- 52.314
Total including MSW incineration	414,300	503,207	46,300	39,063 – 49,744		114.397		25.533- 52.314

Table 1. 4

\* London estimate (from national figures) for solar heating installed as an output of government funding schemes

\*\* Municipal Solid Waste

Source: London Renewable Energy Capacity Study (Draft) SEA/RENUC April 2007

## Renewable Energy

According to the Mayor of London's SoE report there has been a steady increase in the installation of renewable generation capacity in London and output of electricity and heat generated by renewables. Total renewable electricity generation in London (excluding the biodegradable fraction of MSW incineration) has increased by 42,118 MWh or 26.6%. Renewable heat has however, remained approximately at the same level due to the closure of sewage gas plant. Small-scale photovoltaic installations, solar heating and landfill gas schemes have, experienced significant increases in overall capacity. New technologies installed since 2001 include large-scale wind (a single 3.6MW scheme) and biomass heat plant.

Planning applications referable to the Mayor are required to incorporate renewable energy technologies, and applications for major developments are required to generate

a proportion of their energy needs from renewables on site where feasible. The London Plan sets a target for new development to achieve a 20% reduction in CO2 emissions through on site renewable energy generation.

Recent government funding programmes aimed at micro-renewable technologies have helped drive forward the use of PV, solar thermal and micro-wind schemes in London amongst both commercial and residential users. A precise breakdown on the proportion of these schemes installed in London and at the borough level is not available at present.

### Key Issues

London Key Issue	SA Issue for Lambeth
<b>Energy:</b> Increasing demand for use of energy arising from population growth and increased economic activity.	Efficient use and management of energy. Increase proportion of energy from renewable sources.

### Data Gaps and Assumptions

Lambeth energy information.

### References

Green Light to Clean Power - The Mayor's Energy Strategy (2004) -  
<http://www.gos.gov.uk/497417/docs/199952/200905.pdf>

Mayor's Climate Change Action Plan, 2007.

[http://www.london.gov.uk/mayor/environment/climate-change/docs/ccap\\_fullreport.pdf](http://www.london.gov.uk/mayor/environment/climate-change/docs/ccap_fullreport.pdf)

### Built heritage

The Borough contains a diverse and extensive range of building and spaces of historic and architectural interest, both statutorily and non-statutorily protected. The 2007 UDP notes that: *Lambeth has an outstanding heritage, spanning over 500 years of development, and the effective management, preservation and enhancement of this historic townscape is a major challenge.* A particular challenge is that the Borough is experiencing significant pressure for change which will have an impact upon Lambeth's historic environment as well as features of historic and architectural importance beyond its borders, such as the Westminster World Heritage Site.

### Historic Development

Lambeth is one of a ring of local authorities which constitute Inner London. It is a Linear Borough stretching from the banks of the Thames at its North to Streatham and Norwood at the South.

The physical development of Lambeth, as that of London, has happened in bursts beginning in the 18<sup>th</sup> Century when the area was in the rural hinterland of London and ending in the early 20<sup>th</sup> Century when virtually no rural land remained.

In the late 18<sup>th</sup> Century rural Lambeth comprised hamlets, villages, rural estates and farms. Old Lambeth, with Lambeth Palace, St Mary's church and other associated development strung along the South side of the Thames 'Lambeth Marsh' was the most noticeably urban settlement while another was Clapham village which, linked to London by a regular coach service, was developing as a convenient retreat from the city for wealthy gentlefolk. The construction of Westminster Bridge in the 1750s and Blackfriars Bridge in the 1760s had improved connections into the city but development was still slow and piecemeal due to land ownership and a difficulty in securing long leases for development. The first 90 year leases were granted in Kennington in the 1770s.

Up until the 1850s it was the laying out of a good road network that drove new development. Many of the old established roads were improved by the Turnpike Trustees; these routes still constitute the main framework of roads in Lambeth. Numerous Acts of Parliament allowed for the enclosure of common, the laying of new roads or the development of private land in the 1800s and the opening of Waterloo Bridge in 1817 and Lambeth Bridge in 1818 further improved connections to the city.

Ribbon development in the form of smart villas and grand terraces is characteristic of the first half of the 19<sup>th</sup> Century; serving large upper middle-class households. At first these lined the main roads and then in relatively modest, newly laid-out housing estates. With the exception of Clapham most of the residential development at this time was focused in the North of the borough which was most convenient for its residents who wished to be close to London.

By the arrival of the railways in the mid 1850s piecemeal development lined the main roads but many of the new housing estates in the north and centre of the borough still sat amongst tracts of still undeveloped rural land. The Crystal Palace and West End Line of 1856 allowed for the erection of a station at Streatham Hill. Streatham Common Station opened in 1862 and a station opened in Brixton the following year. Initially development spurred yet more suburban villas allowing the upper middle classes to abandon the North of the borough for healthier districts of Streatham and Norwood. However, suburban development in the subsequent decades tended to be denser and terraced and aimed at the growing lower-middle and working classes. Such was the nature of development until the First World War by which time Lambeth was almost completely urbanised with the exception of its parks, surviving commons and other public open spaces. From the then on reconstruction, redevelopment and regeneration have been the predominant themes. Initially, in the 1950s and 1960s, with government sponsored area renewal schemes and latterly with more private sector and housing association led schemes.

## Lambeth's Heritage Assets

### Listed buildings

Around 2,500 buildings in Lambeth are listed. The first were added to the list in 1951 with ad hoc additions to the list continuing through the 1960s and '70s. A great many buildings were added to the list in March 1981 following a borough-wide survey and there have been regular additions since then. The vast majority of historic buildings are 19<sup>th</sup> Century residential dwellings reflecting the historic development of Lambeth. Typically two or three buildings are added to the statutory list each year.

The Annual Monitoring Report (AMR) sets out performance against listed building indicators<sup>1</sup>. No buildings were added or removed from the Listed Buildings register in 2007-8. The number of 'at risk' buildings in the borough has fallen since 2000: 29 buildings were in this category in 2000, with 19 listed buildings in the borough on the 'at Risk' Register in 2007-8. Two buildings were added to the 'at Risk' Register in 2007-8 and two were removed.

### Conservation areas

There are 61 conservation areas in Lambeth; the first being designated in 1969 and the most recent in 2007. Again, as with listed buildings, they are mostly residential in character with some notable exceptions including South Bank (characterised post-war cultural and civic buildings) and West Norwood (characterised by the 19<sup>th</sup> Century Cemetery and its many fine monuments).

Conservation Area statements are prepared by the council to provide a clear indication of their approach to the preservation and enhancement of each individual Conservation Area. The statements illustrate the unique qualities of the area and promote an awareness of its character and special interest. Each statement contains an **Appraisal** that summarises the location and historical development of an area, describes its character and provides an outline of the key issues and identifies development pressures that are currently a cause of concern. The statements also identify any sites that have a negative impact on the Conservation Area or where an opportunity may exist for improvement of the area by redevelopment of a building or site. The statement also formulates specific **Management Proposals** for the area identifying how the council thinks the area can be best managed to preserve or enhance its special character or appearance.

The AMR<sup>2</sup> notes that 10 conservation areas in Lambeth have up-to-date appraisals. No additional character appraisals have been completed since the last AMR. This is

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<sup>1</sup> Source: Lambeth Planning Division, 2008

<sup>2</sup> Source: Lambeth Planning Division, 2008

principally due to significant staff shortages in the Conservation and Urban Design team during 2007-8. It is anticipated that further character appraisals will be completed before the next AMR, with appointments to the vacant posts having been made in Autumn 2008.

More details on the conservation areas are included in the table and map below. It can be seen that they cover a significant proportion of the borough, more than a quarter in fact.

## Details of conservation areas

Name	Date of Designation	Brief Description
<b>Abbeville Road</b>	First designated: 27 October 2003	This Conservation Area comprises a cluster of 19th century commercial properties (shops with residential accommodation over) in short terraces or 'parades'. Consistent building heights and a select palette of materials gives a unified general appearance although interest is added by the variety and contrast of detailing between the blocks. Some surviving traditional shopfronts add further interest.
<b>Albert Embankment</b>	First designated: 26 November 2001	This conservation area comprises mostly large office buildings, the majority of which date from the 20th century, fronting the River Thames along the Albert Embankment. The Embankment walls, lamp standards and benches - along with a small minority of the buildings - date from the 19th century.
<b>Albert Square</b>	First designated: September 1976 Boundary extended: February 1997 Article 4 Direction	The conservation area is characterised by formal terraces of middle class 19th Century housing with unified architectural detailing. The formality of the buildings and their arrangements along conventional streets and a square is of particular interest so too is the mature landscaping of the square and the presence of rear gardens.
<b>Brixton</b>	First designated: 20 October 1980 Boundary changes: March 1982 and February 1999	A 19th Century town centre conservation area containing numerous early-mid 20th Century commercial, civic, residential and retail premises along with Brixton Town Hall, the Tate Library, Ritzy Cinema, St Matthew's Church and Brixton's well known covered markets.
<b>Brixton Road</b>	First designated: Brixton Road - 1968; Angell Town - 1981. Boundary extended: Merged and Extended 2003	Brixton Road is a linear conservation area of mostly early-mid 19th century development, terraced houses and commercial premises, of varying character and appearance.
<b>Brixton Water Lane</b>	First designated: 1969	The Brixton Water Lane Conservation Area is characterised by early-19th century suburban villas and contains a landmark late-19th century public house on the corner of Effra Road.
<b>Brockwell Park</b>	First designated: 10 December 1983 Boundary extended: 24 March 1999	Early 19th century landscaped parkland serving Brockwell House, turned into a public park in the 1890s. The Conservation Area includes all of Brockwell Park and also adjoining residential properties to the south and east boundaries of the park. The conservation area extension in 1999 slightly

		enlarged and consolidated these boundaries.
<b>Clapham</b>	First designated: 1968 Boundary extended: 1969, 1976, 1980, 1997 Boundary redefined: 2002	Clapham Conservation Area, centred on Clapham Common, has many historic buildings dating from the 18th and 19th centuries. There is also a great deal of mid-late 19th century residential development beyond the common's edges which is deemed to be of interest..
<b>Clapham High Street</b>	First designated: 23 October 1997	The buildings on Clapham High Street reflect its 19th century evolution from residential to commercial uses. At first the 18th and early 19th century terraces were converted from houses to shops but later whole new blocks were erected in the late 19th and early 20th centuries. There are good surviving examples of buildings from all these periods.
<b>Clapham Park and Northbourne Road</b>	First designated: Clapham Park - 9 August 1974; Northbourne Road - 27 September 1974.	A conservation area of mainly 19th century suburban development of residential character. It incorporates parts of Clapham Park Road, Northbourne Road, Park Hill, and West Road. Originally designated as two parts, the areas have been merged because they adjoin one another and have similar character.
<b>Clapham Road</b>	First designated: 1 September 1981	A cohesive collection of housing from the Georgian and Victorian period, mostly in terraces along with the impressive St John the Evangelist Church.
<b>Elderwood</b>	First designated: 1976	One of the boroughs smallest conservation areas. Linear in shape and covering some 400 metres, the conservation area includes Elderwood Place, terraced housing, The Park Pub and St Luke's School. It has a suburban character.
<b>Ferndale Road</b>	First designated: 22 September 1994 Extended: 21 July 1997	A street of 19th century terraced houses erected by Joseph George Jennings using his own range of brick and terracotta products. The extension to the Conservation Area in 1997 added numbers 118a to 164 Ferndale Road, and the Ferndale Centre (formerly the Brixton School of Building).
<b>Garrads Road</b>	First designated: 1969 Boundary extended: 1999, 2002	The Garrads Road Conservation Area is characterised by suburban development which began in the 1880s on the Streatham Park Estate and continued through to the inter-war period. The Streatham Park Estate has a very strong Queen Anne style character and the other development, much of it looking over Tooting Bec Common, reflects the architectural tastes of the early 20th century.
<b>Gipsy Hill</b>	First designated: 1974	The Gipsy Road Conservation Area is characterised by piecemeal 19th century suburban development which rises up Gipsy Hill.

	Boundary extended: 1982 Boundary revised: 1999	It includes Gipsy Hill Station, the landmark tower of Christ Church and the former Police Station.
<b>Hackford Road</b>	First designated: 25 June 1974	A small conservation area of early-mid 19th century semi-detached and terraced houses. No. 87 Hackford road was, for a short time, the home of Vincent Van Gogh.
<b>Herne Hill</b>	First designated: December 2007	Commercial and residential development around 1900 fronting the West side of Herne hill around its junction with Half Moon Lane. Buildings of particular note include the former fire station and former postal sorting office which are complemented by buildings of similar age and complementary materials and detailing. Much of the development on the East side of Herne Hill Road is within London Borough of Southwark's Stradella Conservation Area.
<b>Hyde Farm</b>	First designated: 13 February 1996	Developed by Emmanuel College Cambridge between 1896 and 1916, the Hyde Farm Estate has a marked Edwardian character. The builder, Ernest Dashwood, created a coherent and consistent built form which gives the area its special interest.
<b>Kennington</b>	First designated: 1968 Boundary extended: 1979 and 1997	The Kennington Conservation Area is characterised by smart terraced housing which developed from the late 18th century onwards. It also incorporates the impressive Duchy of Cornwall Estate, which was laid out in the 1910s to a very high standard of design and layout.
<b>La Retraite</b>	First designated: 29 March 1982 Boundary altered: 22 February 1999	A conservation area of varied character with former Victorian villas (now La Retraite school) on Atkins Road and early-mid 19th century terraced houses on Cavendish Road.
<b>Lambeth Palace</b>	First designated: 1968 Boundary extended: 1975, 1980 and 1985	The Lambeth Palace Conservation Area has at its heart the exceptionally important Lambeth Palace, a complex of buildings dating from the medieval period. The conservation area also includes the former St Mary's Church, the Victorian buildings of St Thomas Hospital and historic development along Lambeth Road.
<b>Lambeth Walk and China Walk</b>	First designated: 30 June 1998	A conservation area comprising two distinct areas. The Lambeth Walk includes surviving Victorian and Edwardian terraced buildings. China Walk includes the 1920s, Neo-Georgian China Walk London County Council Estate.
<b>Lancaster</b>	First designated: 17	A street of 19th century detached and semi-detached houses reflecting the changing tastes of

<b>Avenue</b>	October 1994	suburban buildings from the 1840s to 1900s. The 1880s houses, with their foliated detailing, are of particular note. A wide road (60ft) gives a spacious character further enhanced by trees and mature garden planting.
<b>Lansdowne Gardens</b>	First designated: 1968 Boundary extended: 1981 Article 4 Direction	The conservation area is characterised by 19th Century middle class villas in mature gardens. They can be detached, semi-detached or set in small terraces and generally have neo-Classical or Italianate detailing. A formal 'circus' with axial streets adds greatly to the character of the area; so too do the church, numerous mature trees and reinstated traditional railings present in the area.
<b>Larkhall</b>	First designated: 8 June 1981 Extended: 1 September 1981 Extended: 24 May 2001	The Conservation Area was later extended westward along Lansdowne Way to include later 19th century residential terraces. In 2002 the extreme west end of the Conservation Area, fronting Wandsworth Road and into Lansdowne Way, was removed from this designation and included in the Wandsworth Road Conservation Area.
<b>Leigham Court Road (North)</b>	First designated: 4 November 2002	A late 19th Century development of upper class housing. The large houses are well-designed and beautifully executed; and their spacious, mature gardens give a pleasing suburban character.
<b>Leigham Court Road (South)</b>	First designated: 18 February 1981	Leigham Court Road (known as St Julian's Road for some time), dates from the 19th century. Its south end exhibits a number of impressive suburban houses from that period. With its wide road and mature planting the area retains much of its original arcadian character.
<b>Leigham Court Estate</b>	First designated: 18 February 1981	Leigham Court Road, for sometime known as St Julian's Road, dates from the 19th Century. Its south end exhibits a number of impressive suburban houses from that period. With its wide road and mature planting the area retains much of its original arcadian character.
<b>Loughborough Park</b>	First designated: 30 March 1981 Extended: 15 January 1987	An attractive and well-planned development of mostly detached and paired mid to late 19th century houses. The buildings are of high architectural quality and the area retains much of its original character.
<b>Lower Marsh</b>	First designated: 4 June 1984	Lower Marsh is an ancient route linking Westminster Bridge Road and Waterloo Road. Today it is lined with mostly 19th Century commercial development and some re-fronted 18th Century buildings. The commercial character continues along park of Westminster Bridge Road. This Conservation Area also includes Baylis Road, where it merges with Lower Marsh and the former Fire Station fronting Waterloo Road.

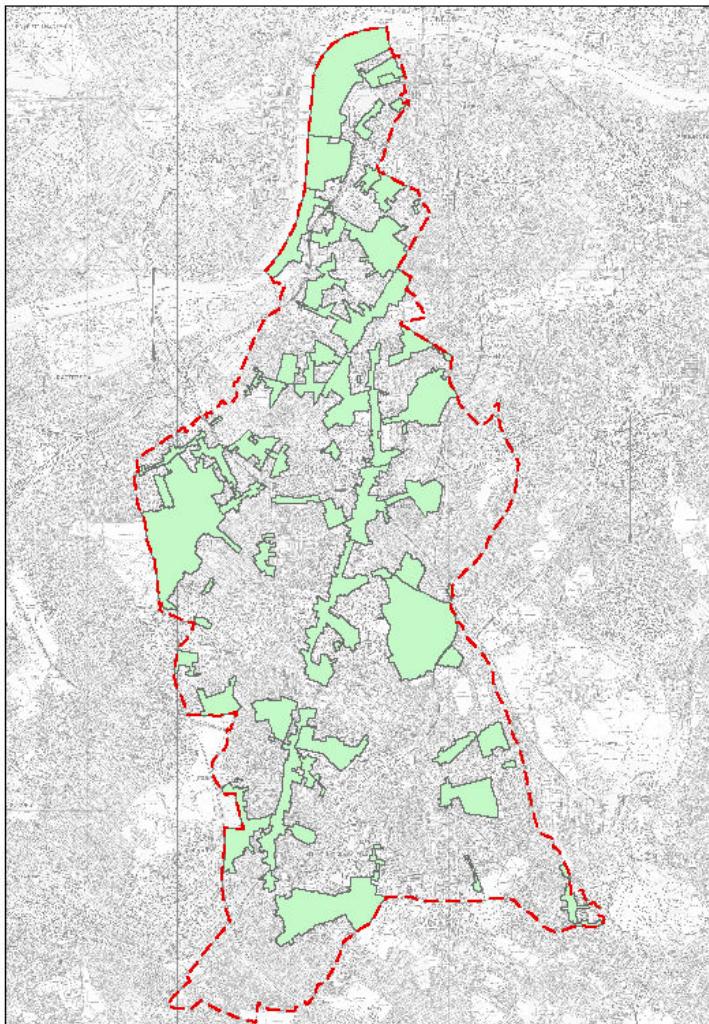
<b>Minet Estate</b>	First designated: 20 October 1980 Boundary extended: 1 December 1982	A late 19th century private housing estate. The estate is uniquely 'self sufficient' with schools, community hall, library, churches and a public park. The residential buildings have a strong character with unifying materials and common detailing. Good garden planting and mature trees add to the special character.
<b>Mitre Road and Ufford Street</b>	First designated: 30 June 1998	A small but very pleasing development of flats and terraced houses erected by the Church Commissioners in the 1900s. Both Mitre Road and Ufford Street benefit from very unified architectural treatments: repetitive building types and common materials provide a strong character. A small recreation ground and mission hall on the corner of Ufford Street and Webber Street is also included in this Conservation Area.
<b>Oaklands Estate</b>	First designated: 7 December 1999	A 1930s London County Council housing estate designed by E. P. Wheeler. The Oaklands Estate has a strong modern architectural style and is set within landscaped grounds. There are 185 flats in two large, five-storey blocks.
<b>Park Hall Road</b>	First designated: 1974 Article 4 Direction	A small conservation area of eight pairs of mid 19th Century villas fronting Park Hall Road. They represent some of the earliest suburban development in the locality.
<b>Peabody Estate - Rosendale Road</b>	First designated: 24 March 1999	A 20-acre development of social housing dating from 1901 onwards, in a mixture of blocks of flats and terraced houses. The flats are in red brick with gault brick detailing and the houses have a 'garden city' aesthetic. Pleasant, mature landscaping throughout. The site incorporates a tenants' hall and war memorial.
<b>Poet's Corner</b>	First designated: 12 October 1998	A mid-late 19th Century residential development of speculative housing for the middle classes. The house styles and detailing vary depending on the date of construction. There is a range of typical suburban detailing, including brickwork, stucco, and design features influenced by various historical styles. Small front gardens and larger rear gardens have, in many cases, reached attractive maturity.
<b>Rectory Grove</b>	First designated: 1968 Boundary extended: 1976, 1979, 1986 and 2001	The conservation area is of a principally linear form containing Rectory Grove, St. Paul's Churchyard and part of Turret Grove including Larkhall Rise to the railway bridge and also the entire length of Clapham Manor Street to its junction with Clapham High Street. The buildings are mostly 19th Century in date and predominantly residential although there are shops and two impressive churches. There are two distinct character areas: Rectory Grove and Larkhall Rise are both informal, intimate and leafy; while Clapham Manor Street is straight, wide and much more formal, which is reflected in its architecture.
<b>Renfrew Road</b>	First designated: 28 October 1985	An interesting collection of 19th and early 20th Century public buildings, including the Workhouse (formerly Lambeth Hospital), Magistrates Court, and the Fire Station fronting just off Renfrew Road. The public house at 42 Renfrew Road is included for its contribution to the area's townscape.

<b>Rosendale Road</b>	First designated: 15 June 1995	Four residential streets representing a good example of late 19th Century development. Red and yellow brick walls, slate roofs and Gothic details predominate. The houses are further enhanced by mature planting in gardens, and street trees.
<b>Roupell Street</b>	First designated: 1 November 1976	John Palmer Roupell developed the Lambeth Estate from the 1820s to 1840s. The development has uniform terraced houses incorporating corner shops and a public house. The streets, Theed St, Roupell St and Whittlesey St, represent an impressive and little altered example of their type.
<b>Rush Common and Brixton Hill</b>	First designated: 27 August 1997	A linear Conservation Area which includes much of Brixton Hill and the surrounding area. The area is characterised by layers of development from different historical periods – especially the 19th century. With commercial properties and public buildings to Brixton Hill and residential development in the adjoining side streets.
<b>Sibella Road</b>	First designated: 11 December 2001	A development of smart suburban houses dating from the mid-late 19th Century. The houses, mostly in stock brick, typically exhibit good Gothic or Italianate detailing in stucco. Small front gardens and longer rear gardens often contain good mature planting and trees.
<b>South Bank</b>	First designated: 27 July 1982 Boundary extended: 12 October 1998	A nationally important collection of 20th Century buildings fronting the South bank of the Thames. The earliest significant building is County Hall, dating from the 1920s. The majority of buildings date from the post-war reconstruction. The Royal Festival Hall (Grade I), the centrepiece of the Festival of Britain site, acted as a catalyst for the development of the whole area.
<b>South Lambeth Road</b>	First designated: 29 March 1982	Two historic routes – South Lambeth Road and Clapham Road - meet to form this conservation area. The buildings are predominantly date from the 19th Century, with notable exceptions including Stockwell Terrace, Beulah House and the War Memorial. Stockwell Bus Garage (1950s) is also included.
<b>St Marks</b>	First designated: 1969 Boundary extended: 1988	The St Marks Conservation Area is characterised by smart terraced housing dating from the early 19th Century onwards; of particular note is Hanover Square. The imposing St Marks Church is its principal landmark.
<b>Stockwell Green</b>	First designated: June 1986	Stockwell Green is a small but dense collection of around 80 properties bounded by Stockwell Road, Landor Road and Combermere Road. Stockwell Green itself is a slightly curving road fronted by early-mid 19th Century houses. Much of the rest of the area has slightly later development, including St Andrew's Church, Landor Road.
<b>Stockwell Park</b>	First designated:	The Stockwell Park Conservation Area is characterised by smart early 19th Century villas mostly

	1968 Boundary extended: 1972 and 1980 Boundary Redefined: 2003	with Neo-Classical detailing. These houses - detached, semidetached and in short terraces - sit within pleasant mature gardens, giving them a pleasing sylvan quality. Landmark buildings, mature trees and a general unaltered appearance contribute to the special character of the area.
<b>Streatham Common</b>	First designated: 16 June 1994	Streatham Common is a centuries-old open space that forms the heart of this conservation area. It is complemented by the adjoining, overlooking buildings. The common has an open landscaped character, becoming wilder as it rises from Streatham High Road. The perimeter buildings - commercial, residential and institutional - reflect the 19th Century development of the district. The Rookery and Park Hall, both historic landscapes of merit adjoining the common, are also included in this Conservation Area.
<b>Streatham High Road and Streatham Hill</b>	First designated: 7 December 1999	One of London's major arterial roads, Streatham High Road and Streatham Hill are ancient routes into the city. Development along Streatham High Road is mostly late 19th century in character, while much of the development along Streatham Hill is early-mid 20th century. There is a bustling town-centre character to the area, with many retail and entertainment buildings alongside churches and residential mansion-blocks.
<b>Sunnyhill Road</b>	First designated: 2 April 1973 Boundary extended: 1982 De-designation: part de-designation 7 December 1999.	An area of modest semi-detached and terraced 19th Century housing in stock brick.
<b>Telford Park</b>	First designated: 9 September 1994	A development of suburban houses along Criffel Avenue, Killieser Avenue, Telford Road and parts of Kirkstall Road and Thornton Avenue, laid out 1878-82. The architect was EJ Tarver, who skilfully ensured that no two of his Queen Anne style houses on the estate were identical. The lawn tennis club, also within the conservation area, was opened in 1880 and is the second oldest in England after Wimbledon.
<b>The Chase</b>	First designated: 7 December 1981	Originally a drive linking Wandsworth Road and Clapham Common North Side. Developed with substantial houses in the 1870s, there are detached, semidetached and terraced properties displaying a range of architectural styles.
<b>Trinity Gardens</b>	First designated: August 1978	The Trinity Gardens Conservation area has three distinct character parts. The first area has imposing early 19th century residential development along Acre Lane, the second area has more modest terraces leading to and enclosing Trinity Gardens and the third is the late Victorian City of

		London Almshouses.
<b>Vassal Road</b>	First designated: 1968 Boundary extended: 1981	The Vassal Road conservation area is characterised by smart terraced, semi-detached and detached housing dating from the 1820s onwards, with sympathetic infill development from the late 1970s and early 1980s. At the centre of the area stands the imposing Church of St John the Divine.
<b>Vauxhall</b>	First designated: 8 June 1981 Boundary extended: May 1984 and June 1998	A substantial conservation area stretching from Kennington Lane through Harleyford Road and down to Vauxhall Park. There are numerous sub-areas, with an 18th and 19th century urban mixed residential and commercial character.
<b>Vauxhall Gardens</b>	First designated: 26 November 2001	An area of working class development that retains characterful industrial and residential sub-areas dating from the late 19th and early 20th centuries. The industrial development is mostly to the West side of the Conservation Area (including Glasshouse Walk, Tinworth Street and Vauxhall Walk). The residential development, in the form of Neo-Georgian London County Council blocks of flats (including Jonathan Street, Tyers Street Vauxhall Street and Worgan Street), is found to the East side
<b>Walcot</b>	First designated: 1968 Boundary extended: 1980	The Walcot Conservation Area is characterised by smart terraced housing dating from the late 18th Century onwards and includes squares at Walcot Square, St Mary's Gardens.
<b>Wandsworth Road</b>	First designated: 14 October 2002	A mostly 19th Century development, in three separate sub-areas along Wandsworth Road. The area is linear in character and contains a building types ranging from housing to commercial and industrial (the former Plough brewery). The buildings are typically two or three storeys with narrow frontages in the traditional manner. Numbers 335-355 Wandsworth Road and 139-149 Lansdowne Way were previously included within the Larkhall Conservation Area (CA 29).
<b>Waterloo</b>	First designated: 19 October 1981	Waterloo Conservation Area represents more than a century of development located close to the south bank of the Thames. It reflects the changing fortunes of the area through the late 18th, 19th and early 20th centuries. The Conservation Area includes parts of Cornwall Road, Stamford Street and Waterloo Road. The mix of building types and uses ranges from former terraces to large commercial buildings.
<b>West Norwood</b>	First designated: June 1978 Boundary extended:	The second of eight London cemeteries established by Act of Parliament between 1832 and 1847. A designed landscape of historical interest containing numerous structures of interest, the cemetery forms the heart of the conservation area with adjoining 19th century public, commercial and

<b>Westow Hill</b>	October 2003 First designated: 16 February 1998	residential buildings also being included.  A linear development of 19th century commercial and retail properties laid as the area developed on the success of the Crystal Palace. Opposite is the London Borough of Croydon's Upper Norwood Triangle Conservation Area. To the east is London Borough of Bromley's Crystal Palace Park Conservation Area and to the West is Lambeth's Gipsy Hill Conservation Area.
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Conservation Areas in Lambeth

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Source: Lambeth Planning Division

### Other designated areas

The borough has a number of Archaeological Priority Areas where development proposals may require investigation and recording of archaeological evidence.

There are no scheduled ancient monuments in Lambeth.

There are eight sites on the English Heritage register of Historic parks and gardens ranging from former private estate or gardens to public parks and cemeteries. Most are open for public enjoyment and all are cherished by local people not just for the heritage value but for amenity and nature conservation.

### Data Gaps and Assumptions

Conservation Area Statements

## **References**

Lambeth Unitary Development Plan 2007,  
<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/AdoptedUnitaryDevelopmentPlan2007.htm>.

Lambeth Local Development Framework Annual Monitoring Report 2007/08,  
<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/AnnualMonitoringReport.htm>.

## **Key Issues**

<b>London Key Issue</b>	<b>SA Issue for Lambeth</b>
	Protect and enhance heritage assets, their settings and the wider historic environment

## **Social**

### **Housing**

Affordable housing can be divided into three categories: social housing is housing provided by a landlord where rent is no higher than government/housing association targets and access is on the basis of housing need; intermediate housing is sub-market housing where rents are between target rents and open market levels (e.g. key worker housing); and market housing is that which is owner-occupied or rented from a private landlord.

Growth in the number of households and the incomes of house buyers have combined to intensify pressure on house prices in London. Affordable housing supply has failed to keep up with demand. The London Plan Annual Monitoring Report (2007) shows that affordable housing output increased between 2003/4 and 2004/5 and fell back slightly in 2005/6 to 7653 or 31% of total conventional provision(new build and rehabilitation). The trend between 2002 and 2004, as London Plan policy emerged, was for boroughs to increase their affordable housing targets. Since the publication of the London Plan, several more boroughs have adopted or proposed borough-wide targets of 50%. 16 boroughs now have borough-wide affordable housing targets of 50% or more and four other boroughs seek 50% affordable housing on some sites.

There is a need for more affordable homes in London. The affordability of housing in the owner-occupied sector has been declining since beginning of 1990s as a result of escalating house prices, such that house price to income level has now reached historically high levels. House prices in London in 2004 were currently 1.6 times the average for England and Wales and average private sector rents more than three times the UK average. The lack of affordable homes to rent or purchase is an especially acute

issue for first-time buyers and key workers such as teachers and bus drivers, contributing to problems of recruitment and retention in the public sector. Many people have to live longer in temporary or overcrowded accommodation, move further out of London or live elsewhere.

The importance of this issue to people living and working in London is highlighted in the Annual London Survey 2003 (MORI/GLA, January 2004) in which 94 percent of interviewees agreed that housing in London was too expensive, including 68 percent who agreed strongly. 48 percent of interviewees thought that affordable housing/property prices was a top priority to improve London as a place to live and work. The best available estimate in 2004 was that 25,700 additional affordable homes, from all sources, are needed in London per annum to meet demand.

This is made up of:

- 5,000 natural growth;
- 11,200 to meet past unmet need;
- 2,000 to replace losses of stock due to right to buy;
- 2,500 additional households unable to afford increasing house prices; and
- 5,000 'intermediate' homes.

Lambeth is dominated by single person households and London is dominated primarily by single person households and households with one married couple with children. England as a whole has a significantly higher proportion of households occupied by one married couple with children<sup>3</sup>.

Lambeth is dominated by houses with 3, 4 and 5 habitable rooms. This does not include bathrooms, toilets, halls or landings but includes all other rooms such as kitchens, living rooms and bedrooms. London has a high number of 4 and 5 room houses. England as a whole is dominated by dwellings with 5 rooms, has a significant proportion of dwellings with 6 rooms and has far less dwellings sized between 1 and 3 rooms.<sup>3</sup>

At almost 70% of the total, Lambeth is dominated by people living in flats, maisonettes or apartments. The remaining 30% is mostly attributed to persons living in a house or bungalow. In London there is an almost equal split between the two categories of dwelling and England as a whole features an entire contrast to Lambeth where some 80% of the total dwellings are houses or bungalows.<sup>3</sup>

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In England as a whole, almost 70% of dwellings are privately owned. Similarly, the amount of housing in London that is privately owned exceeds 50%. However, in Lambeth, less than 40% of housing is privately owned.<sup>3</sup>

### Data Gaps and Assumptions

None.

### References

London Plan Annual Monitoring Report 2007.

London Plan Sustainability Appraisal 2004

Annual London Survey 2003 (MORI/GLA, January 2004)

### Key Issues

London Key Issue	SA Issue for Lambeth
The need for affordable and sustainable housing and different types of dwelling Spiralling housing costs Increased demand	The need to increase the overall supply and mix of housing, including affordable housing and capacity for conversions.

## Infrastructure

### Transport

London was founded on trade and remains at its heart a city of commerce, where its economic strength and its centres of activity are dependent upon an efficient transport network that enables the workforce to access employment. Alongside this London is home to over 7 million people and is predicted to grow by a further 800,000 by 2016. The quality of life for residents and their ability to access opportunities, health, education and leisure also depend upon an efficient, integrated and inclusive transport system.

Most activities in London ultimately require the collection and delivery of goods and the provision of services. Industries such as manufacturing, construction and retailing are particularly dependent on the physical movement of goods. Although the key financial and business services sector does not generate regular bulk movement, it is dependent on the prompt delivery of office supplies, documentation, services and personnel. Moreover, the retail industry is again taking on more of the responsibility for the carriage of goods with increasing home delivery. Hospitals and other public services are similarly dependent on the efficient delivery of goods and services, and all premises need efficient, timely maintenance services that involve transporting materials and equipment. Freight is carried by road, rail, water and air but road dominates.

Historically, London's record on investment in transport does not compare favourably with other European cities. Substantial levels of investment are required to maintain and improve the transport infrastructure and to sustain London's projected growth, as highlighted by many organisations during the lead-in to the Government Spending Review 2004. There are a number of major projects that will act as a catalyst for change within London including:

- Thameslink 2000;
- Crossrail and Crossrail 2;
- East London Line Extension; and
- transport measures arising from the Olympics.

Whilst the step change that will be provided is welcomed in terms of enhancing London's status as a World City these projects will have only a peripheral impact on Lambeth. The Mayor's Transport Strategy highlights the critical nature of transport links in supporting regeneration and promoting social inclusion, by improving access for people in deprived areas and helping all parts of the city share in its prosperity. Recent research in London confirms the close link between accessibility and employment potential. The levels of poverty and exclusion in Lambeth are some of the highest in Britain and large groups of people find it hard to get work or gain the skills needed to enter the job market.

Investment that is focused on the above major schemes will, in the absence of appropriate investment in local solutions in Lambeth, only serve to exacerbate these social inequalities. As a result the three most critical elements of transport investment are the delivery of the Cross River Tram and Croydon Tramlink extensions and the delivery of local improvements. The Lambeth Transport Local Implementation Plan (2005 - 2011) therefore strongly argues that significant levels of funding are needed in Lambeth in order to address both existing social inequalities and to balance the uplift that will occur across other parts of London with the delivery of these major projects.

The Government's 10 Year Plan for Transport reported a 22 percent growth in rail freight nationally over the past three years, and looked forward to an 80 percent increase over the next ten years. The Strategic Rail Authority (SRA) has forecast that 16-17 percent of this increase could arise in London, with the majority of this being non-bulk items transferred from other modes. The Hatfield accident and its aftermath has affected confidence in rail freight. The period following Hatfield saw a seven percent reduction in the amount of freight carried compared to the corresponding period of the previous year. Rail freight is expected to recover from Hatfield, helped by the Rail Regulator's recent near halving of track access charges for freight.

The Strategic Rail Authority's Freight Strategy recognises that achieving the targets of the 10 Year Plan will be harder than was the case when the 10 Year Plan was

published. To achieve growth in London's rail freight of the scale envisaged would require substantial increases in handling facilities. It indicates that three or four inter-modal freight handling facilities would be required, along with a number of smaller facilities within the urban area. The use of some Central London rail terminals for freight distribution at night has also been suggested.

London is served by the Port of London Authority, which is the UK's biggest port, handling 52.4 million tonnes of cargo, and is a vital gateway for international trade. Although serving London, much of the port is physically located outside the GLA boundary. The River Thames provides significant opportunities for sustainable freight access into the heart of the Capital. The Thames is particularly suited to the transport of bulk materials, such as waste and aggregates. The movement of waste by river is largely dependent on the continued availability of waste disposal (landfill or incineration) on the Thames.

In the future there is potential for the transport of recyclables by water, though not necessarily at the same levels at which waste is currently transported. Existing and prospective use is also limited by the difficulties inherent in getting the materials transported to and from loading and unloading sites along the River. A collaborative approach is needed across London, which focuses in particular on encouraging new facilities and protecting existing facilities, supporting water-borne freight movement through the planning regime.

### **Green Infrastructure**

London's open spaces include green spaces such as parks, allotments, commons, woodlands, natural habitats, recreation grounds, playing fields, agricultural land, burial grounds, amenity space and children's play areas (including hard surfaced playgrounds), and accessible countryside in the urban fringe. Civic spaces, such as squares, piazzas and market squares also form part of the open space network. The variety and richness of London's open spaces contribute hugely to its distinctive and relatively open character. Open spaces provide a valuable resource and focus for local communities, can have a positive effect on the image and vitality of areas and can encourage investment. They provide a respite from the built environment and an opportunity for recreation. They promote health, well being and quality of life. They are also vital facilities for developing children's play and social skills.

The Mayor's State of the Environment Report for London notes that Green Belt forms 22 percent of the area within the Greater London boundary, whilst 9.6 percent of Greater London is Metropolitan Open Land (MOL). The designation of MOL is unique to London and protects strategically important open spaces within the urban area (e.g. Richmond Park). There is also a large variety of locally important open spaces that form part of the wider network, such as recreational open space and allotments.

As London becomes more compact and intensive in its built form, the value of open spaces will increase. Access is particularly important where open spaces are in short

supply. This is often the case in areas of regeneration, where lack of local green spaces is exacerbated by fewer private gardens and fewer opportunities for people to travel large distances to access green areas.

The London plan categorises spaces according to their size and sets out a desirable distance that Londoners should travel in order to access each size of open space. For example, the hierarchy suggests that all Londoners should have easy access to a local park or open space within 400 metres from their home. Using these standards to map public open space provision, the hierarchy should provide an overview of the broad distribution of public open space provision across London, highlight areas where there is a shortfall and facilitate cross borough planning and management of open space.

Lambeth's Open Spaces Strategy and the GLA report 'Improving Londoner's Access to Nature' both contain information on open space and wildlife site potential improvements and priorities.

### **Data Gaps and Assumptions**

None.

### **References**

The Mayor's Transport Strategy (GLA, July 2001)

The Lambeth Transport Local Implementation Plan (2005 - 2011)

The Government's 10 Year Plan for Transport

Greener London – The Mayor's State of the Environment Report for London (2007).  
<http://www.london.gov.uk/mayor/environment/soereport.jsp>

'Improving Londoner's Access to Nature' (GLA, 2008)

Lambeth Open Space Strategy (updated 2007).

### **Key Issues**

<b>London key issue</b>	<b>SA Issue for Lambeth</b>
Infrastructure Provision	Provide the essential Infrastructure to support population growth

### **Equality and Diversity**

London is a diverse and cosmopolitan city made up of people from many different backgrounds. More languages and cultures are represented in London than in any other city in the world. London's children speak one or more of over 300 languages, a third of the population is of black and minority ethnic origin, 13 percent of the population is

aged over 65, one in ten Londoners have some form of disability and London has the largest population of lesbian and gay people in Britain.

Many of London's communities share the same needs. The Annual London Survey 2003, a major annual opinion survey of Londoners conducted for the GLA (MORI/GLA 2004), showed that the top priorities for living in London were safety/crime and affordable housing/property prices. For working in London the top priorities were job opportunities and affordable housing/property prices. Inability to access many of London's opportunities and attractions, including the opportunity to work, restricts the independence of disabled people and means that instances of poverty, social exclusion and isolation amongst disabled people is higher than average, with many disabled people restricted to certain local areas.

Thirteen percent of London's population is aged over 65 or above and three percent of London's total population is aged over the age of 80. Yet the proportion of people aged 65 or over living in London is less than in many parts of England, where older people make up an estimated 16 percent of the population. Many pensioners in London live in households without a car. Convenient, safe and reliable public transport is therefore a priority for them. Many older people would be more predisposed to remaining in London after retirement if London's environmental quality was perceived to be higher, and the provision of basic facilities such as accessible places to meet, public toilets and street furniture were greater.

Poverty affects children and young people in many ways. It may mean suffering overcrowded and poor quality housing conditions, poor health and nutrition, lower levels of education attainment and restricted recreational choices and mobility. London has the highest rates of teenage drug dependency, homelessness and pregnancy in the United Kingdom as well as a high proportion of other groups with key needs such as refugees, young carers and disabled children, who are often doubly disadvantaged by poverty and discrimination. Children, young people and their parents are very concerned about crime and safety. The provision of high quality childcare, play, leisure, cultural and educational facilities across London is undoubtedly a determinant of children's future life chances. These combined with inadequate provision of safe play space restrict children's activities and affect their physical and mental development.

Women are significant contributors to London's economy; they represent 46 percent of all taxpayers in London. However many women's experiences of London are affected by concerns about the gender pay-gap, child care, health facilities and personal safety, particularly in the public realm but also on public transport. They are more likely to do the shopping and ferrying children alongside working, mainly part-time. Because of the inadequacy of public transport and because women often make a range of complex local journeys, many feel obliged to acquire cars. Those that cannot afford to are further restricted in job opportunities. Women need convenient, affordable and safe public transport.

Nearly a third of all Londoners are from black and minority ethnic (BME) groups. Many black and minority ethnic groups have distinct spatial needs. The Government's Social Exclusion Unit recently reported that: "While there is much variation within and between different ethnic groups, overall, people from minority ethnic communities are more likely than others to live in deprived areas and in unpopular and overcrowded housing. They are more likely to be poor and to be unemployed, regardless of their age, gender and qualifications."<sup>4</sup>

London has the largest gay, lesbian, bisexual and trans people population in the country. Discrimination at work is a common problem. Same sex partners frequently do not receive the same benefits (e.g. travel concessions or special leave) as heterosexual couples and have different legal rights. Many people in this group are victims of violent crime but are less likely to report it to police; early results from a national survey of lesbians and gay men found that 25 percent said they had suffered homophobic assaults serious enough to be considered criminal offences.

Interaction between communities in London is encouraged by large scale events such as the Respect Festival, which promotes respect and diversity through music, and numerous faith group or cultural festivals which celebrate different communities and encourage tolerance.

The London Borough of Lambeth has a Race Equality Scheme (May 2008 - 2009). Socially and culturally, the borough is one of the most diverse in the country. It has a population of approximately 272,000 people, 38% of which are members of Black and Minority Ethnic (BME), communities. The Black Caribbean (12%) and the Black African (11.6%) communities form the largest ethnic groups in the borough, though communities from all over the world have settled in the borough and the Race Equality Scheme suggests that the "mixed" ethnic category will increase in the future. Lambeth's cultural and ethnic diversity is unusual. Most boroughs with significant ethnic minority communities are home to a limited number of different ethnic groups. By contrast, Lambeth has a plethora of small groups living alongside established, mainly African-Caribbean communities. The borough has the largest Portuguese community in Europe outside Portugal and an increasing number of refugees from Vietnam, Somalia, Eritrea and Angola.

Lambeth is a relatively young borough; 22% of the population are under 18 and 45% between 20 and 39. There are approximately 40,000 residents with physical, sensory or learning disabilities and long-term health problems, and approximately 30,000 people spend a substantial amount of their time caring for relatives and friends.

Lambeth is a borough of stark contrasts, with conspicuous wealth and extreme poverty side by side. In terms of its relative socio-economic position, Lambeth occupies 19th

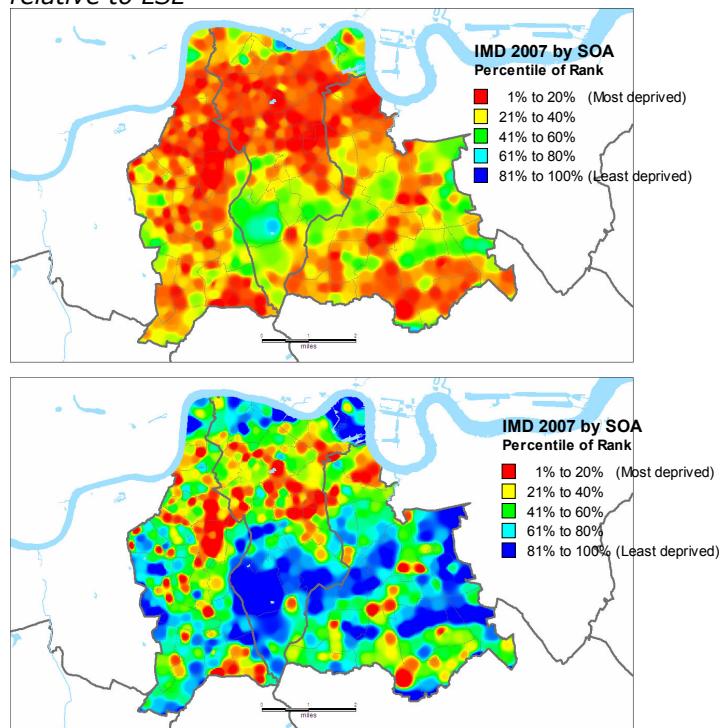
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<sup>4</sup> Social Exclusion Unit/ODPM  
<http://www.socialexclusionunit.gov.uk/publications/reports/html/bmezip/summary.htm> Strategic Service Development Plan (SSDP), Lambeth, Southwark and Lewisham March 2008.

place out of a total of 354 on the level of deprivation scale for England, and 7th amongst the other London Authorities. Unemployment is a major barrier to economic prosperity, with the borough experiencing nearly double the rate for London as a whole. Addressing this is one of the primary goals within Lambeth's Sustainable Community Strategy (2008-2020) with a target set for 70% of residents in work by 2012. This is significant challenge given the low rates of literacy and high number of residents with no formal qualifications compared with the national average.

The maps below show deprivation by SOA relative to England, and relative to Lambeth, Southwark and Lewisham<sup>5</sup>

*Deprivation (IMD 2007) by SOA relative to England and Deprivation (IMD 2007) by SOA relative to LSL*



In terms of its relative socio-economic position, 11 of the borough's 22 wards fall within the 5% most deprived in England. These wards are concentrated in the north and centre of the borough (Source: Government Office for London). The Sustainable Community Strategy 2008-2020 embodies Lambeth's vision for social and economic prosperity for the borough and its residents and the key improvements needed to improve the quality of life and life-chances for those that live and work within the borough. It is recognised that more can be achieved by working in partnership.

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Lambeth also has a Gender Equality Scheme (2007 – 2010) which analysed of a range of surveys and information in order to put together a snapshot list of gender inequalities under 6 categories:

- Children and young people;
- Healthier communities and older people;
- Safer and stronger communities;
- Economic development and enterprise;
- Active communities and neighbourhoods; and
- Transforming and supporting the organisation.

### **Children and young people in Lambeth**

At Key Stage 2 (ages 7 – 11), girls outperform boys in English, maths and science; the gap in relation to English-based subjects has been 10%-plus every year since 2003.

At Key Stage 3 (ages 11 – 14), boys generally outperform girls in maths and science; girls still achieve better results than boys in English, although the gap has narrowed from an 18% difference in 1999 to 9% in 2006.

At Key Stage 4 (14 – 16), more girls than boys achieve five good GCSEs but boys have narrowed the gap from a 7% difference in 1998 to just 2% in 2006.

77% of Lambeth pupils who are permanently excluded are boys and boys are three times more likely to be permanently excluded than girls. Black Caribbean boys are highly represented in exclusion statistics.

Lambeth has significantly high levels of teenage conceptions.

Homeless 16 – 17-year-olds accounted for 14% of all households accepted as homeless in Lambeth in 2005/06.

Young black men in Lambeth are three times more likely to enter the criminal justice system than white people.

### **Healthier communities and older people in Lambeth**

33,110 people are over 60 – 12.4% of the population and 7,418 of over-60s have a long term limiting illness. 11.4% of women and 19.2% of men over 60 are permanently sick or disabled.

More than 22,000 people provide care on an unpaid basis for a child, family member(s), partner or friend(s). 12,500 people – nearly 5% of Lambeth residents - provide up to 19 hours per week unpaid care for one or more adults. 3,500 residents – 1.3% of the borough's population - provide over 50 hours of unpaid care.

Over 10% of Lambeth households are headed by lone parents, compared with 6.4% nationally.

The council spends more than £1 million per annum on buying in services for older people from the voluntary sector.

### **Safer and stronger communities in Lambeth**

59% of Lambeth residents name crime as the issue of greatest personal concern to them; the next most important issue – the level of council tax – is nominated by only 36% of residents.

17% of women and 12% of men feel unsafe in the area where they live during the day and 39% of women and 28% of men feel unsafe in the area where they live after dark.

Men are more concerned than women about car theft and general theft, women more concerned about sexual harassment as a crime.

Lambeth has a higher rate of domestic violence than any other London borough and domestic violence costs Lambeth almost £30 million per year. These costs take no account of the enormous pain and suffering caused to victims and their families.

Families with children/pregnant women account for over 60% of all households accepted as homeless and 74% of all households in temporary accommodation.

### **Economic development and enterprise in Lambeth**

Overall, Lambeth is the 23rd most deprived of the 354 boroughs in England. Lambeth falls below the Inner London employment average for both men and women: the most affected age groups for men are 16 – 19s, 35 – 49s and over-50s; for women it is the 20 - 24, 25 - 34 and over-50 age groups.

Lambeth is below the London average for self-employment; barriers include business start-up support services which do not meet the needs of groups such as women, young people and black communities.

Self-employment amongst BME residents is less than half the Inner London average.

### **Active communities and neighbourhoods in Lambeth**

88% of Lambeth's citizens agree that it is a place where people from different backgrounds get on well together but residents feel that the council could do more to empower communities to develop their neighbourhoods.

There are no statistics to show how many residents who do voluntary work are women, and how many are men.

The council's Community Voice initiative is designed to improve engagement with individuals and communities, with the aim of increasing participation in public life.

### **Transforming and supporting the organisation in Lambeth**

56% of council staff are women, but only 36% of the top 5% of earners in the council are female. 56% of disabled staff are female.

81% of female staff and 77% of male staff feel that flexible working would or does improve their performance at work, and 82% and 78% respectively believe that it would/does benefit their personal life.

Of the 53 members of staff who responded to a 2006 survey on disability, 25% were carers and 6% were themselves disabled as well as being a carer; 85% of carers were women.

LGBT staff have expressed concern that there is very limited visibility of policies on equality for LGBT staff and service-users; the lack of information available to managers and staff about employment issues relating to sexual orientation or gender identity is also of particular concern.

### **Data Gaps and Assumptions**

None.

### **References**

Annual London Survey 2003 (MORI/GLA 2004)

Social Exclusion Unit/ODPM

<http://www.socialexclusionunit.gov.uk/publications/reports/html/bmezip/summary.htm>

London Borough of Lambeth Race Equality Scheme (May 2008 - 2009)

### **Key Issues**

<b>London key issue</b>	<b>SA Issue for Lambeth</b>
Meeting the needs of a growing population with a changing demography, greater diversity and worsening trends of social inequalities	Develop mixed, cohesive, safe communities accessible to all

## Safety and Security

There are two key elements of crime and safety; actual crime and the fear of crime. Statistics from the Metropolitan Police reveal that Lambeth has seen a dramatic decrease in crime since 2000, with total crimes falling by some 80%. The table below contains a breakdown of crimes by nature and shows the percentage change between 2000/2001 and 2006/2007.

<b>Crime Statistics for Lambeth: Comparison 2000/2001 – 2006/2007</b>				
<b>Crime</b>	<b>2000/2001</b>	<b>2006/2007</b>	<b>Difference</b>	<b>% Change</b>
Violence Against the Person	7904	2540	-5364	-67.86
Sex Offenders Total	561	132	-429	-76.47
Robbery Total	4961	364	-4597	-92.66
Burglary total	6150	364	-5786	-94.08
Theft and Handling Total	19412	1074	-18338	-94.47
Fraud or Forgery Total	4059	225	-3834	-94.46
Criminal damage Total	6384	587	-5797	-90.81
Drugs Total	1367	3171	+1804	+131.97
Other Notifiable Offences Total	422	418	-4	-0.95
<b>Grand Total</b>	<b>50950</b>	<b>8875</b>	<b>-42075</b>	<b>-82.58</b>

Source: information extracted and adapted from  
<http://www.met.police.uk/crimestatistics/index.htm#1999>

The second aspect of crime is the fear of crime. This refers to when a person experiences the fear that they will be a victim of crime regardless of any specific threats, and is frequently related to the actual chance of them becoming a victim. While the records show a significant reduction in crimes in Lambeth, the fear of crime can remain a significant issue if the public realm is characterised by uninviting underpasses, blank edges, poorly lit areas and a lack of natural surveillance etc. Enhancement of the public realm should be addressed in order to not only improve ease of movement in the area, but also quality of life, an important element of which is reducing opportunities for and fear of crime.

## Data Gaps and Assumptions

None.

## References

Information extracted and adapted from  
<http://www.met.police.uk/crimestatistics/index.htm#1999>

## **Key Issues**

<b>London key issue</b>	<b>SA Issue for Lambeth</b>
High levels of crime and perception of crime, the continuing threat of terrorism and the need to make London safe for both visitors and residents	Develop mixed, cohesive, safe communities accessible to all

## **Accessibility / Availability of Local Services and Facilities**

London Plan policy 3A.18 states that

*"DPD policies should assess the need for social infrastructure and community facilities in their area, including children's play and recreational facilities, services for young people, older people and disabled people, as well as libraries, community halls, meeting rooms, places of worship and public toilets. Adequate provision of these facilities is particularly important in major areas of new development and regeneration. Policies should seek to ensure that appropriate facilities are provided within easy reach by walking and public transport routes of the population that use them".*

National Indicator 175 'Access to services and facilities by public transport, walking and cycling' monitors the fostering of social inclusion through access to core services and facilities via non-private modes of transport. Core services are defined as:

- Healthcare – Hospitals and GP surgeries;
- Education – primary, secondary and higher education sites;
- Food shops; and
- Employment sites.

In recent years the pressure on reception places throughout Lambeth has been extreme and is projected to increase. As an emergency measure, the council has added temporary classrooms in primary schools in 2007 and 2008 and is projecting to have to do the same for the next few years whilst a more strategic expansion programme is instigated. It is therefore important that any proposed housing developments or regeneration programmes are sensitive to the issue of community sustainability with regard to primary education, and provision for additional primary places is built into any framework. Lambeth's Children's and Young Persons Scheme is looking closely at the capacity of the primary school estate to expand but the likelihood is that in the future additional primary schools will be required and the sites for the school(s) necessary to meet the increased demand created must be provided as part of housing schemes and funding to build the schools come from S106 payments.

School provision in Lambeth has been the subject of Council scrutiny as well as local campaigns for additional secondary schools.

## Data Gaps and Assumptions

None.

## References

Lambeth Education Scrutiny Committee, Report of Secondary School Review Commission, Feb 2003.

## Key Issues

London key issue	SA Issue for Lambeth
Ongoing pressure to move around London and potential adverse impacts in the form of congestion, increased pressure on public transport systems etc.	Good access to services and facilities. Tackling congestion

## Viable and Safe Town Centre Management

Whilst many of the appraisal objectives are qualitative in nature this objective is particularly subjective. There is no single definition of what constitutes a high quality of urban design, particularly in the context of a city as complex as London. The Government's Urban White Paper described good urban design as:

- the creation of lively places with distinctive character;
- the creation of places that are easy and safe to move within and through;
- the creation of streets and public spaces that are safe, accessible, pleasant to use and human in scale;
- the regeneration of run down areas;
- enabling more sustainable patterns of development through the more efficient use of land; and
- making places that are visually attractive.

The objectives of the Millennium Community projects, including development at Greenwich, demonstrate the breadth of this topic. The objectives are listed below:

- minimise resource consumption;
- protect and enhance local environment capital;
- maximise design quality;
- improve construction quality and efficiency;

- increase social inclusion and participation;
- maximise quality of life; and
- achieve long term economic viability.

In the context of London issues relating to tall buildings and maintenance of existing views and vistas are also relevant urban design issues.

The Government's Strategy for Sustainable Construction 'Building a Better Quality of Life' (DETR 2000) identifies ten themes that the concept of sustainable construction embraces:

- re-use existing buildings wherever possible rather than new-build;
- design for minimum waste during the construction, operation and decommissioning of the building;
- aim for lean construction - seeking continuous improvement across the other themes;
- minimise energy in construction - both in relation to production and transportation of materials;
- do not pollute;
- preserve and enhance biodiversity;
- conserve water resources - design for increased water efficiency;
- respect people and their local environment - be responsive to the community in planning and undertaking construction, consider the workforce; and
- set targets - measure performance and benchmark against others.

The GLA's Architecture and Urbanism Unit has stated:

*"Like many of the UK's cities, London has suffered from poor quality development in the past. We need a better skills base and a new culture, which values design and improves the skills of its design practitioners and its clients, especially in the public sector. We will look at how international and European models of design procurement, partnering and delivery can be translated to work in the UK, and will promote the value of open and competitive design processes, as a key to securing inclusive and high quality strategies and designs.*

*London's public realm comprises everything from our doorsteps, to our great squares, parks and the River Thames. While there have been many examples of high quality building development in London, many of our public spaces have become hostile and shabby environments, underused or avoided by Londoners. This underuse is not just wasteful; it is also harmful to local communities and local economies.*

*London has many fine residential buildings and public spaces – like the Georgian squares of Chelsea and Notting Hill - but precious few have been created in recent years."*

### **Data Gaps and Assumptions**

None.

### **References**

Government's Strategy for Sustainable Construction 'Building a Better Quality of Life' (DETR 2000)

### **KEY ISSUES**

<b>London key issue</b>	<b>SA Issue for Lambeth</b>
Viable, safe and well managed town centres	Create viable, safe and well managed town centres

### **Public Transport, Cycling and Walking**

Features of Lambeth taken from the Local Implementation Plan (2005):

- A high proportion of residents use public transport and car ownership is low. Lambeth has the highest proportion of population who travel to work by public transport – 58.6% compared with 14.1% nationally.
- Air quality is a significant issue across Lambeth with road traffic the main source of pollution.
- Lambeth is served by fourteen overland rail stations that are evenly spread throughout the Borough, and nine Underground stations predominantly in the north, providing vital links into central London.
- The London Bus Network has seen a significant increase in patronage in the last few years. It offers an extensive network of local scheduled services that provide links to key transport interchanges. Brixton High Street in particular is one of London's busiest transport interchanges with bus, rail and Underground connections.
- Residents living in Streatham and Norwood without direct access to the Underground are dependent on rail connections and buses for their needs. With bus routes tending to be focused on the main north-south radial routes into central London and a lack of east-west services some housing estates continue to have low levels of accessibility.
- Meanwhile, 50.9% of households have no access to a car – one of the highest proportions in the country – again highlighting the importance of, and reliance on good public transport in the Borough.

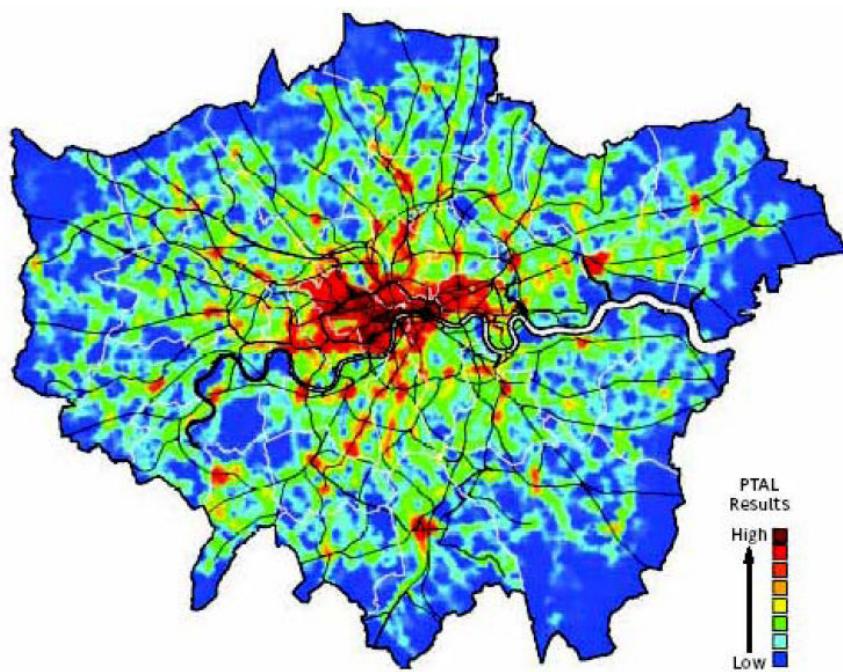
The concentration of development in areas that have good public transport provision should encourage a reduction in dependence on the private car. There is a close relationship between the density of development and the methods of travel used, with higher density developments and improved local facilities and services encouraging public transport use, walking and cycling. A mix of different uses, located close together, can help reduce the distance people need to travel. Parking provision (both residential and non residential) also significantly affects whether people choose to drive.

Development that will generate large numbers of trips should be located at places accessible by public transport and with existing or planned capacity in time to meet need. In determining applications for development and any conditions attached to implementation, including those relating to the phasing of developments, account should be taken of the availability of adequate public transport access and capacity, and the development's transport impact.

A significant problem in Lambeth, as in much of London, is poor public transport capacity (the number and rate of people it can carry). This includes lack of fixed link lines, lack of stations, lack of capacity at stations and on the lines themselves. The Government's 10 Year Transport Plan, and the Mayor's Transport Strategy, are designed to solve some of these, however in some cases significant developer contributions will be needed to secure them/bring them forward. Individual developments may not, in themselves, have a significant impact on public transport capacity but may add to existing problems, or impact on future predicted problems. The Council's adopted UDP therefore states that *each individual development needs, therefore, to be assessed in light of existing and future predictions of capacity*. Policy 9 of the UDP advises refusal of planning permission for development which contributes to a transport capacity shortfall, unless measures are secured as part of the application to make this acceptable.

The figure below illustrates the different levels of access provided by public transport in London. Locational planning will be informed by consistent Londonwide public transport access mapping (the PTAL calculator), which has been developed by Transport for London (TfL), in conjunction with the boroughs. Access is very good in Central London but there are significant areas in East London, Inner North East London and South London where public transport accessibility is inadequate, presenting a barrier to economic growth and regeneration. Much of London's periphery is also poorly served by public transport.

**Figure 1 – Access to Public transport in London**



Source: The Mayor's Transport Strategy (GLA, July 2001)

The Mayor's Transport Strategy provides information on current transport use in London. The table below summarises transport use by different modes as published in the Mayor's Transport Strategy. Car and public transport use varies in different parts of London. The car is the most dominant form of transport in Outer London, accounting for four out of every five vehicular trips. Car use is roughly balanced with the use of other modes in Inner London, whilst most travel in, from and to Central London is by public transport.

Buses and underground travel account for a broadly similar number of trips (4.7 and 4.5 million daily passenger boardings respectively) but Underground use is for longer trips primarily to, from and within Central London, whilst buses are the most used public transport mode outside Central London. National Rail has the primary role for travel into Central London from beyond Greater London, and its large proportion of peak trips reflect its focus on commuters.

Walking accounts for about a quarter of all trips and bicycles account for two percent of all journeys. Results from TfL's London Residents Transport Survey suggest that cycling everyday is most common in Central London. Infrequent or leisure cycling is most popular in south-west suburban areas of London.

Although car ownership in London is lower than in the rest of the UK (36 percent of London households currently do not own a car compared with 28 percent in the rest of the UK), more journeys need to be made by public transport to reduce road traffic. Road traffic accounts for over half of London's nitrogen oxides emissions and two-thirds of fine particles, the two pollutants of greatest concern for health. Heavy traffic flows reduce the reliability of bus services, disrupt servicing and delivery movements for business, lead to traffic accidents and contribute to noise pollution. Areas where these are particular problems include Central London, Inner London, West London (especially Heathrow) and along major roads.

<b>Travel in London by Different Modes</b>										
<b>Mode of travel</b>	<b>Daily trips (million)<sup>1</sup></b>	<b>Average trip length (km)</b>	<b>Network speed [kph (mph)]</b>	<b>Trips for work (%)</b>	<b>Trips in period (%)</b>					
<b>Underground<sup>2</sup></b>	4.7	7.7	32(20)	51	57					
<b>National Rail</b>	1.6	27.4	56(45)	55	60					
<b>Docklands Light Rail</b>	0.1	5.1	29(18)	61	60					
<b>Bus</b>	4.5	3.4	18(11)	28	36					
<b>Walk</b>	7.0	0.8	5(3)	12	35					
<b>Car / Motorcycle</b>	11.0	11.7	31(19)	26	45					
<b>Bicycle</b>	0.3	5.0	16(10)	34	24					
<b>Dial-a-ride and Taxicard</b>	0.01 million trips per day									
<b>Coach</b>	0.2 millions trips per day									
<b>Croydon Tramlink</b>	0.05 million trips per day (October 2000 levels)									
<b>Minicabs</b>	Approximately 0.2 millions trips per day									
<b>River</b>	0.01 millions trips per day									
<b>Heavy Goods Vehicles</b>	3% of vehicles on major roads									
<b>Light Goods Vehicles</b>	11% of vehicles on major roads									
<b>Motorcycles</b>	2% of the 11 million car/motorcycle total									
Notes										
Trips on a midweek day: 2000 estimate for Underground and Tramlink; 1999 estimate for other modes										
<sup>1</sup> Daily trips based on passenger boardings (including interchanges) for Underground, National Rail and bus										
<sup>2</sup> Underground trips are often quoted as journeys excluding Underground to Underground interchanges										

Source: The Mayors Transport Strategy (GLA, July 2001)

The numbers of trips on the Underground and National Rail Services have been growing rapidly since the early 1990s. Underground crowding is increasingly severe; the Central, Victoria, Piccadilly and Northern Lines all have sections of line that are classified as severely crowded at peak times. On National Rail services in Inner London,

passengers frequently experience much more intense overcrowding than average figures suggest.

The proportion of scheduled bus kilometres not operated more than doubled from 1.8 percent in 1995/1996 to 4.3 percent in 1999/2000. The proportion of low frequency (timetabled) services departing on time fell from 71 percent in 1995/1996 to 67 percent in 2000/2001. Traffic congestion was the cause of almost half of the bus kilometres not run. Violations of bus lane and parking regulations are additional major causes of service unreliability. 92 percent of scheduled kilometres were operated on the Underground in 2000/2001. In the summer of 2000 reliability for National Rail services in London varied between 84 percent and 91 percent of trains departing on time, before reducing significantly after Hatfield.

London's bus, Underground and National Rail services are insufficiently integrated; lack enough good interchanges; often have inadequate information (notably minute-by-minute service information); and too often have poorly co-ordinated service timings. The wide range of means of travel available and the common need to interchange, show that integration within and between modes is of particular significance in London.

Public transport fares in London rose rapidly over a period of 15 years, which in contrast to the relatively static cost of running a car has provided a disincentive to the use of public transport. However, more recently the level of the average fare paid in real terms has remained constant on the underground and declined for bus journeys.

The number of walking trips made in London has declined by 13 percent in the past decade. Research shows there are many factors that discourage people from walking. These include concerns about traffic volume, air quality, road safety, personal security, lack of information and the poor quality of the street environment. Walking is rejected as a mode of transport because London's streets are seen as unattractive, dirty, cluttered, inconvenient, badly maintained, poorly lit and difficult to cross. In addition, people with disabilities often find their needs have not been considered.

Half of all journeys made in London are under two miles, a distance easily cycled. However, the level of cycling in London is relatively low compared to many other European cities. There are many reasons why people do not cycle including safety issues, poor cycling environment and lack of information or skills.

A significant proportion of those who travel to work in Lambeth do so via the means of the underground and high proportion use bus, mini bus or coach. These proportions far exceed that of London and England as whole illustrating the importance of the Underground and Bus Stations. The proportion which use the train is also higher than in London or England as a whole. A significant proportion, but one that is far below that of London and England, travel to work driving a car or van demonstrating the importance of public transport to the study area. The majority of the workplace population within Lambeth travel up to 20km to get to work or work from home.

Road traffic is the primary cause of air pollution in Lambeth, as it is in the rest of London. The vehicle emissions of greatest concern are Nitrogen Dioxide, Fine Particulates (PM10), Carbon Monoxide and Volatile Organic Compounds (VOC's) such as Benzene. High levels of any of these pollutants can affect health, making breathing problems, such as asthma, and heart problems worse. An inventory of all air pollution emissions in London was compiled by the London Research Centre. The inventory estimates that vehicles in Lambeth emit over 20,000 tonnes of the above pollutants every year. This represents 90% of air pollution emissions from all sources in the Borough. In addition vehicles in Lambeth create nearly a quarter of a million tonnes of the greenhouse gas carbon dioxide, which contributes to global warming.

Borough analysis shows that, despite expected improvements in air quality in Lambeth over the next few years, two pollutants, nitrogen dioxide and fine particulates, are likely to fail government targets. As a result of the most recent (stage 4) air quality assessment the Council has revised the extent of its designated Air Quality Management Area (AQMA) to cover the entire Borough. This is in line with neighbouring Boroughs Southwark and Croydon who are extending their AQMAs to cover their whole Boroughs as a result of their stage 4 assessments.

### Data Gaps and Assumptions

None.

### References

The Mayor's Transport Strategy (GLA, July 2001).

### Key Issues

London key issue	SA Issue for Lambeth
Increase public transport, cycling and walking	Increase public transport accessibility and promote walking and cycling

### Health and Well Being

In some health indicators London performs well. For instance, although it is a big killer, coronary heart disease mortality rates are lower in London than in other parts of England<sup>6</sup>. However, London faces specific health challenges such as HIV, substance abuse and mental health. London has 57 per cent of England's cases of HIV. As many as 27 per cent of those infected with HIV may be undiagnosed, which would mean 8,600 Londoners are not receiving treatment. One in four adult drug users live in London. One million Londoners have had mental health problems<sup>7</sup>. Suicide is the most common cause

<sup>6</sup> 6 National Centre for Health Outcomes Development  
Indicators and subsequent statistics in reason one taken from London Healthcare Observatory, *Health and Healthcare in London – Key Facts*, September 2006, <http://www.healthcareforlondon.nhs.uk/rs>

<sup>7</sup>

of death for men under 35 years old, and London is not on track to meet its target of a twenty per cent reduction in suicide rates by 2010.

Londoners also need more help to adopt healthy lifestyles. Twenty-two per cent of Londoners smoke. As a result, one Londoner dies every hour from a smoking-related disease and smoking costs the NHS in London over £100 million a year.

London has higher rates of childhood obesity than the rest of England. Every year in London, obesity accounts for 4,000 deaths. London is far away from the "fully engaged" scenario envisaged by Sir Derek Wanless, where everything is done to prevent ill health<sup>8</sup>.

Whilst overall life expectancy in London is similar to national levels there are very significant differences within London. Just eight stops on the Jubilee line takes you from Westminster to Canning Town where life expectancy is seven years lower.

This discrepancy means that raising life expectancy for the bottom half of London boroughs to the current London average would save 1,300 lives every year<sup>9</sup>.

Other examples of health inequality include:

- the infant mortality rate in Haringey (8.1 per 1,000 births) is three times that of Richmond (2.7 per 1,000 births)
- Hammersmith and Fulham has twice the proportion of smokers of Harrow (34.5 per cent compared with 17.5 per cent)
- two thirds of children in Kensington and Chelsea consume three or more portions of fruit and vegetables a day, compared with one third in Barking and Dagenham<sup>10</sup>
- there are twice as many binge drinkers in Wandsworth (21.1 per cent) as in Newham (9.3 per cent)
- the teenage conception rate for Lambeth at 98 per 1,000 females aged fifteen to seventeen is almost four times that of Richmond (24 per 1,000)
- mental health inpatients are more than twice as likely to come from the twenty per cent most deprived London electoral wards as from the twenty per cent least deprived<sup>11</sup>.

For many Londoners the benefits of living in this cosmopolitan capital city are outweighed by poverty and disadvantage. For a variety of interrelated reasons some people are excluded from, or unable to take advantage of, the opportunities that exist. These inequalities are illustrated most dramatically by differential health outcomes. In a single London borough average life expectancy can vary by as much as ten years

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<sup>8</sup> Wanless D, *Securing our Future Health: Taking a longterm view* (The Wanless Report), April 2002

<sup>9</sup> *The London Health Inequalities Forecast*, London Health Observatory, November 2006.

<sup>10</sup> All taken from the *National Centre for Health Outcomes Development Indicators*

<sup>11</sup> 19 Dr Foster, *Availability of Mental Health Services in London*, April 2005

between people living in the most and least deprived neighbourhoods. Across the city average life expectancy declines as you move from richer to poorer neighbourhoods, and at an individual level, chances of good health decrease for those lower down the income and social gradient. Levels of obesity, mental illness and smoking are higher in poorer neighbourhoods. 600,000 children in London live in poor households, and in inner London boroughs over half of all children live in relative poverty. All the evidence suggests that these children's poor start in life will damage their long-term chances of leading a healthy life.

'Cardiovascular diseases' is a broad category that covers a number of specific health problems related to the circulatory system. In terms of mortality, coronary heart disease (CHD)<sup>110</sup> and cerebrovascular disease (stroke) are particularly important. CHD is the leading cause of death among Londoners, accounting for 10,679 deaths in London in 2001. In the same year stroke was responsible for the deaths of 5,765 Londoners<sup>14</sup>. Estimates suggest that in London there are around 80-90 new diagnoses of CHD and 24 acute strokes per 10,000 population each year<sup>15</sup>. Cardiovascular diseases are also linked with other conditions such as diabetes and respiratory diseases that are themselves responsible for a significant amount of morbidity and mortality in London.

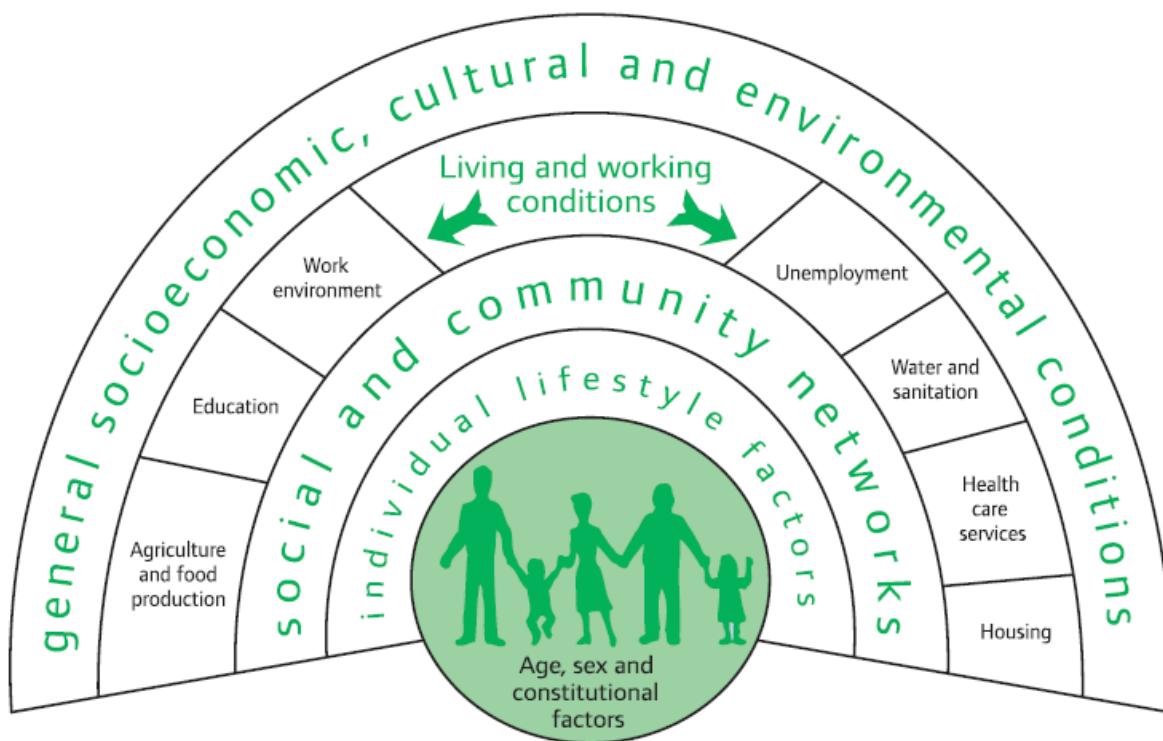
The London Health Strategy (London Health Commission 2000) uses a series of high-level health indicators to measure the health of London. These are:

- unemployment;
- ethnicity and unemployment;
- educational attainment;
- proportion of homes judged unfit to live in;
- domestic burglary rate;
- air quality;
- road traffic accidents;
- life expectancy at birth;
- infant mortality rate; and
- proportion of people with self-assessed good health.

The figure below presents the determinants of health in terms of layers of influence, starting with the individual and moving to wider society. Included in these layers are the first seven of the ten indicators of the London Health Strategy. The indicators have

been designed to highlight significant aspects of the key factors affecting health. The final three indicators, life expectancy at birth, infant mortality rate and the proportion of people with self-assessed good health, are rather different in nature and purpose, and fall outside the scope of this particular diagram. They offer a means of judging health outcomes themselves, that is, the results for individuals and communities of the interplay of the different influences shown in the diagram.

### Determinants of Health (in terms of layers of influence)



Source: Policies and strategies to promote social equity in health (Dahlgren and Whitehead 1991)

The table below summarises recent trends for the ten indicators in London. All seven health determinants have improved since the mid-1990s but for unemployment and burglary, there has been a slight deterioration compared to the previous year. The unemployment figures reflect the recent economic slowdown. Life expectancy is generally increasing nationally and in London. Infant mortality is decreasing as well. There is insufficient information to determine trends in self-assessed health status, although a previous report showed it had remained constant.

The general improvement since the mid 1990s must be weighed against doubts about the value of some of the indicators (e.g. GCSE performance), and setbacks in other respects (ozone increases, ethnic inequality). Any economic slowdown could have a negative effect on some of the determinants.

<b>Determinants of health and health outcomes for London : Recent trends</b>	
<b>Indicator</b>	<b>London Trend</b>
Unemployment rate	Rose in 2002, after an eight year fall
Unemployment rate among black and ethnic minority people	New categories - not comparable with earlier years. Effects of 2002 economic slowdown not yet known. Gap with white people has widened since 1985.
Percentage of pupils achieving 5 GCSE grades A*-C	Still improving
Proportion of homes judged unfit to live in	Falling slowly since 1997 (improved fitness)
Burglary rate per 1000 resident population	Rose or stabilised in 2001/02, after a seven year fall.
Air quality indicators - NO2 and PM10	Subject to weather changes; improved for most pollutants since 1996, but ozone concentrations worse.
Road traffic casualty rate per 1000 resident population	Improved in 2001 over previous year, and 6% below 1994-1998 average
Life expectancy at birth expectancy	The previous report showed that life is generally increasing nationally and in London. However, these trends need to be revisited when new population estimates for 1991-2000 based on the 2001 Census are available.
Infant mortality rate decreasing in London and nationally.	Decreasing in London and nationally.
Proportion of people with self-assessed good health.	Remained more or less constant from 1999-2001

Source: *Health in London - Review of the London Health Strategy Indicators, 2003 Update*  
*(London Health Commission 2003)*

The health gap between the rich and the poor in terms of life expectancy and infant mortality is widening not closing in the capital, a trend that is reflected across the country as a whole.

A report by the London Health Observatory, 'Mapping Health Inequalities Across London' (Fitzpatrick and Jacobson 2001), pointed out that the Government and local agencies had a difficult task to meet their targets to close the health gap between rich and poor.

The report concluded:

*"Inequalities in life expectancy and infant mortality within London have been increasing throughout the 1990s and therefore, if these current trends continue, by 2010 inequalities will be even greater than they are today."<sup>12</sup>*

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<sup>12</sup> Fitzpatrick J. and Jacobson B. (2001). Mapping Health Inequalities Across London. London Health Observatory, London.

Currently, the Health Inequalities Strategy is being developed as part of new responsibilities given to the Mayor of London by the Government within the 2007 Greater London Authority Act (see Appendix I for more details). The Act requires the Mayor to develop a strategy setting out ‘proposals and policies for promoting the reduction of health inequalities between persons living in Greater London.’ This strategy aims to improve the well-being of all Londoners and narrow the gap between those with the best and worst health by:

- raising awareness about health inequalities, their causes, why they matter to all of us, and what we can do to reduce them;
- tackling the barriers to opportunity and inclusion that affect mental, physical, and social well-being;
- acting now to help those Londoners bearing the greatest burden of ill-health; and
- developing and promoting London as an exemplar healthy city where all individuals and communities can thrive and flourish.

Tackling health inequalities is key to delivering the Mayor’s vision for London. The Mayor believes action to reduce health inequalities must be delivered in collaboration with communities and individuals – not imposed on them.

Priorities for this strategy have been developed to reflect both the Mayor’s ambition for London and the knowledge, expertise, and health-related goals of a wide range of partners.

The Mayor is publishing this strategy for consultation with the London Assembly and the functional bodies of the GLA. It sets out some evidence on health inequalities in London and a series of proposed high-level actions. At this stage it does not include a detailed delivery plan. The Mayor intends to use this phase of consultation to discuss with key partners which agencies are best placed to lead on delivery of key elements of the strategy.

In terms of the borough picture<sup>13</sup>:

- Lambeth is one of the most diverse boroughs of the country and also one of the most deprived. It is also the most densely populated areas boroughs in the country. The population is also highly mobile with a significant ongoing level of migration in and out of the borough.
- Lambeth as the 5th most deprived borough in London and 19th most deprived in England, hence poverty and social exclusion are some of the key social challenges in the borough. One in twenty Lambeth residents live in fuel poverty and the proportion

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<sup>13</sup> Lambeth PCT 5 year commissioning strategy 2008/09 refresh

of children and young people living in poverty is higher than average. It is estimated that 40% of Lambeth workers are well qualified and the average income is above national average. However, there are also high proportions of economically inactive people living here and among those adults seeking jobs, 60% have no qualifications or low level qualifications.

- Lambeth has a high proportion of young people compared to the rest of the country with approximately 50% individuals in the 20-44 age group. The birth rate has been rising and the resident population is projected to grow by a further 15% to 317,000 by 2028.
- Unsurprisingly, health outcomes that relate to deprivation are relatively poor in Lambeth: life expectancy, infant mortality and premature deaths from cardio vascular diseases and cancer. However, these outcomes have been improving in recent years, despite the worsening relative deprivation of the Borough.
- Other major health challenges primarily relate to unhealthy lifestyles: teenage pregnancy, high smoking prevalence, childhood obesity, improper alcohol intake and substance misuse... These are associated with poorer health outcomes in areas such as chronic liver disease, renal disease and diabetes.
- Lambeth has a much higher prevalence of mental health needs than other comparative boroughs of London.
- Significant health inequalities exist in areas such as infant mortality, teenage pregnancy and childhood obesity.
- Crime remains the number one concern for Lambeth residents. Air pollution is also a problem as Lambeth is currently not meeting air quality standards. Accidents and unintentional injuries are the third main cause of premature mortality in Lambeth. However, local health services are perceived positively by local residents.

Hence, Lambeth is an extremely challenging environment for improving health needs due to its mobile, diverse population and increasing deprivation. However, despite the challenges, there have been significant improvements in the population's health in recent years in areas such as male life expectancy, teenage pregnancy rates, infant mortality, cancer mortality and deaths from heart disease.

Whilst adult obesity levels in Lambeth may be less than the national average, The 'Healthy Weight – Healthy Lives' strategy<sup>14</sup> states that a conservative estimate for the future prevalence of obesity among children under 15 is that the proportion will rise to over 36% in 2010. This is similar to the childhood obesity levels seen in many parts of the USA. There is almost no difference between the projection for boys and girls and this

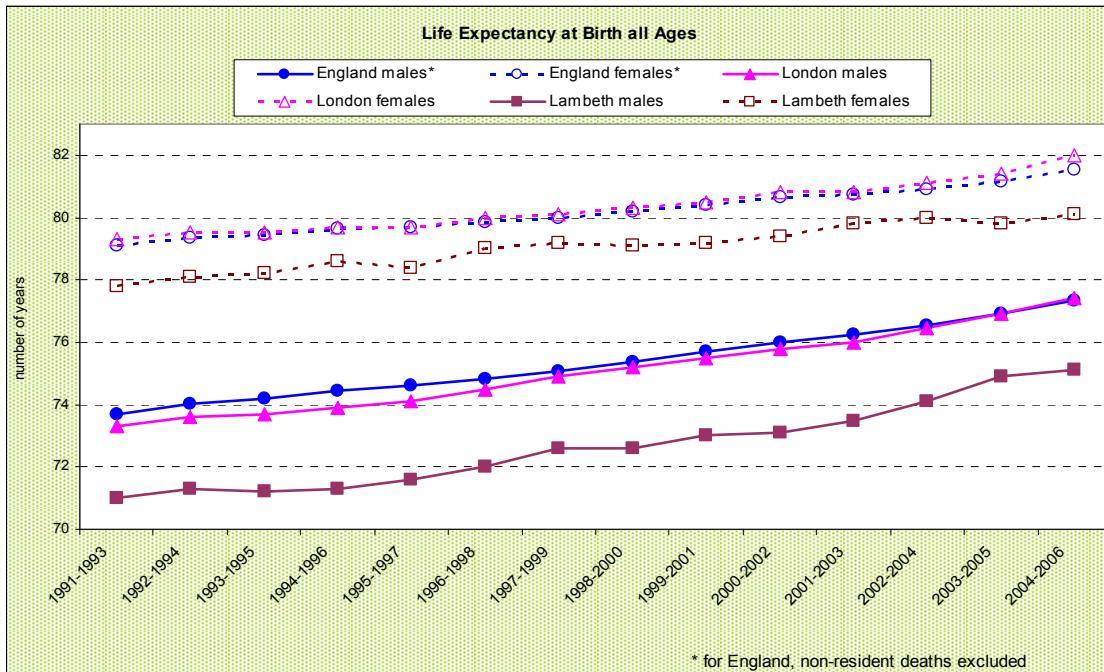
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<sup>14</sup> Lambeth Healthy Weight – Healthy Lives Strategy 2008-11, Lambeth PCT

increase of three fold since 2001 raises the importance of ensuring that healthy eating and physical activity are promoted consistently through childhood and effective weight management options are available for children.

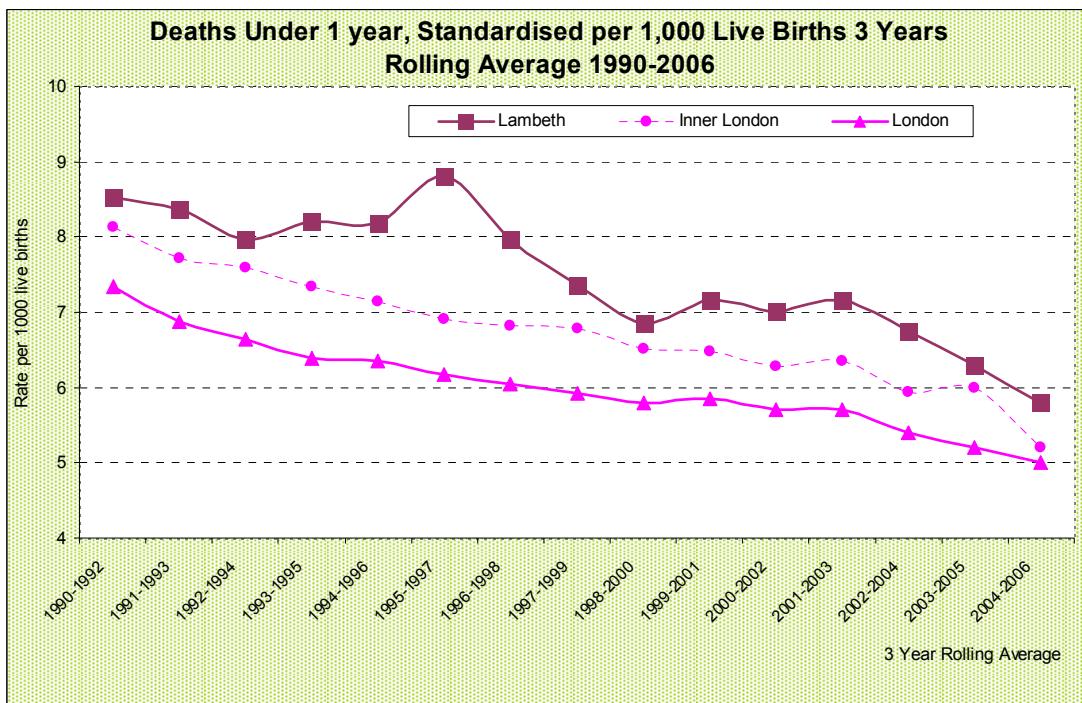
Two of the most commonly used health indicators are life expectancy and infant mortality.

Lambeth male **life expectancy** has shown improvement compared to the female life expectancy, although nationally, life expectancy is improving at a faster rate compared to the spearhead PCTs. These are the 20% of PCTs in England with the highest levels of deprivation. Lambeth is one of these spearhead PCTs.



Source: Estimated Resident Population Mid-2006, ONS

**Infant mortality** (deaths of infants aged under 1 year) has dropped from 8.8 per 1000 live births in 1995-97 to 6.3 per 1000 live births in 2004-06 which is a reduction of over 26%; however there is still a gap when compared to the London rate as seen in the graph below.



Source: Office for National Statistics (ONS). NCHOD – National Compendium of Health Outcomes Development. ([www.nchod.nhs.uk](http://www.nchod.nhs.uk))

## Data Gaps and Assumptions

None.

## References

- Mayor's Draft Health Inequalities Strategy, 2008.  
<http://www.london.gov.uk/mayor/health/strategy/docs/health-inequalities-text.pdf>
- 'Mapping Health Inequalities Across London' (Fitzpatrick and Jacobson 2001)
- Health in London - Review of the London Health Strategy Indicators, 2003 Update (London Health Commission 2003)
- Policies and strategies to promote social equity in health (Dahlgren and Whitehead 1991)
- The London Health Strategy (London Health Commission 2000)

## Key Issues

London key issue	SA Issue for Lambeth
Poor health outcomes and a widening	Addressing health inequalities

disparity of relative wellbeing across London boroughs (across and range of health issues), high rates of child poverty and the relative impacts on the capacity of Londoners to engage economically	
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## Economy

There are different ways of defining and measuring poverty. The approach taken in the Mayor's consultation document 'London Divided - Income Inequality and Poverty in the Capital' (GLA, November 2002) is to use disposable household incomes as a proxy measure for standards of living. This approach is based on the assumption that the standards of living of individuals are in the main determined by the income of the household in which they live rather than, for example, by their own individual income. This approach is particularly relevant to London where the polarisation of incomes is more extreme than in other parts of Great Britain.

Clearly, standard of living will depend on the number of people in the household. It is therefore necessary to convert household income into an equivalent income which takes account number of individuals in the household and the ages of children. Whether disposable income is measured before or after housing costs makes a major difference to income distribution in London and can distort comparisons with other regions in the UK. It is therefore important to specify which measure is being used.

The income poverty threshold used is 60 percent of the national median disposable household income.

Income poverty affects one in four of London's population. It is particularly prevalent in Inner London, where the scale of income poverty for children, working age adults and pensioners is significantly greater than for any region in Great Britain.

The Mayor's consultation document 'London Divided – Income inequality and poverty in the capital' (GLA, November 2002) identifies the following characteristics:

After housing costs 41 percent of children in London are living in income poverty. This means that London has the highest incidence of child poverty (after housing costs) of any region in Great Britain. In Inner London this rises to 53 percent of children, compared to 33 percent in Outer London and 31 percent nationally. The North East has the next highest incidence of child poverty at 37 percent.

Thirty percent of working age adults are in income poverty after housing costs in Inner London compared to 19 percent in both Outer London and Great Britain as a whole. The North East has the next highest incidence of poverty after housing costs for working age adults, at 23 percent.

Thirty six percent of pensioners in Inner London are in poverty after housing costs compared to 25 percent nationally and 21 percent in Outer London. Again the North East has the next highest rate after Inner London, at 28 percent.

The incidence of income poverty is highest for children in workless lone parent and couple families. The high child poverty rate registered in London is to a large extent due to the fact that 33 percent of children in London are living in workless families, compared to 22 percent nationally.

73 percent of Pakistani and Bangladeshi children and 55 percent of black children are living in income poverty after housing costs.

More recent economic deprivation figures for Lambeth taken from the Office for National Statistics are shown in the table below.

<b>Key Figures for Economic Deprivation In Lambeth</b>		<b>Lambeth</b>	<b>London</b>	<b>England</b>
<b>Economic Activity Rate (Persons, Apr06-Mar07)</b>	<b>%</b>	71.7	75.0	78.6
<b>Employment Rate (Persons, Apr06-Mar07)</b>	<b>%</b>	65.1	69.3	74.3
<b>Unemployment Rate (Persons, Apr06-Mar07)</b>	<b>%</b>	9.6	7.6	5.5
<b>All People of Working Age Claiming a Key Benefit (Persons, Aug05)</b>	<b>%</b>	18	15	14
<b>Job Seekers (Persons, Aug05)</b>	<b>%</b>	4	3	2
<b>Incapacity Benefits (Persons, Aug05)</b>	<b>%</b>	7	6	7

Source: Office for National Statistics

Lambeth is a diverse and vibrant inner London borough. It is home to around 270,000 residents and nearly 10,000 businesses. The north of the borough includes two significant gateways to London at Waterloo and Vauxhall, both key transport interchanges, and hosts a number of headquarters of leading international companies, as well as the cultural and creative industries of the South Bank complex and the Cut. But the dynamism and prosperity exhibited by that area is not replicated across the borough. Lambeth is among the most socially and economically deprived local authority districts in the country. The population is young and diverse, unemployment remains relatively high and nearly a fifth of all residents have no qualifications.

The role of local authorities in developing local economies and in leading and facilitating the partnerships that deliver economic growth has been emphasised in recent government policies and initiatives. These include the local government white paper, Strong and Prosperous Communities, which emphasised that it is through authorities

prioritising economic development to create sustainable, thriving and cohesive communities that changes leading to increasing prosperity will be delivered. The Review of Sub-National Economic Development and Regeneration seeks to provide greater flexibilities, powers and incentives to respond to economic change and contribute to and benefit from economic growth. Lambeth Council and its partners in Lambeth First are now determined to transform the fortunes of the borough through working together within the coordinated framework established through the Regeneration Delivery Plan and the Economic Development Strategy.

The South Bank is one of central London's leading business districts, home to international companies such as Shell and IBM. It is also a flourishing global cultural quarter containing the Royal Festival Hall, the National Theatre, the Old and Young Vic theatres, the BFI and the London Eye. Vauxhall is home to a number of gay venues in this dynamic area. Redevelopment is taking place in this area at a tremendous rate, and North Lambeth currently accommodates 61,500 jobs, almost 45% of the borough's total. Infrastructure and public realm improvements are needed to further develop and regenerate the more deprived parts of the north of the borough.

Brixton is at the heart of Lambeth and is a major town centre. At the centre of the African-Caribbean community in London, it has developed a reputation as a diverse cultural and creative force. Brixton's economy has suffered as a result of a deteriorating physical environment, an inadequate retail offer and the highest levels of deprivation in the borough. Brixton contains highly significant development opportunities, and Tesco and the new owners of the indoor markets are considering further investment. Coordinated public sector support for the regeneration of the town centre will be fundamental to maximising its potential.

Clapham is a popular residential location and the High Street's restaurants, pubs and clubs attract visitors from across London, as do sport and live music events on Clapham Common. Regeneration is being led by the redevelopment of Mary Seacole House, the leisure centre and library. Stockwell is home to one of Britain's largest Portuguese communities, and many Caribbean and East African people also live in the area. Business growth has taken place in the area, in other business sectors, hotels and restaurants, education and retail.

Streatham's High Road has nearly 2.5 kilometres of shops and leisure attractions, with some major development opportunities. Norwood is a mainly residential area, but contains the borough's remaining industrial area. Its centre is under-performing and regeneration of a number of key sites and facilities will be crucial to improving its vitality.

### **Data Gaps and Assumptions**

None.

## References

'London Divided – Income inequality and poverty in the capital'(GLA, November 2002)

Lambeth Economic Development Strategy (2007-2010)

Economic deprivation figures for Lambeth taken from the Office for National Statistics

## Key Issues

London key issue	SA Issue for Lambeth
Continued high rates of child poverty and the relative impacts on the capacity of Londoners to engage economically and socially	Increase the number of jobs in the local economy, including local jobs for local people

## Employment

Lambeth, in common with other areas in London, has achieved continuing growth in jobs in recent years, but also suffers from a high rate of economic inactivity. Lambeth's economically active population was 67.6% in comparison to a London figure of 74.3%<sup>15</sup> and a national figure of 78.4% from October 2005 to September 2006. Lambeth also has a steadily growing and highly mobile population, and a high proportion of working age people, who all need to be accommodated within the workforce. It also suffers from high levels of need, with higher than average proportions of lone parents and BAME groups who have lower than average employment rates. Other factors within the London labour market include a high level of competition for jobs, putting young people, the lower-skilled and parents at an increasing disadvantage. There are also particular problems in London accessing affordable childcare.

At the same time the nature of employment is likely to change in the future, with increasingly high levels of skills demanded by employers. Most occupations already require greater levels of skills than in the past. Skills that were once seen as specialist and technical, such as ICT, have become core requirements for most jobs. In 2012 there will be increased demand for more highly skilled occupations, while lower and some intermediate-skilled occupations will provide a smaller share of employment. By 2014, two-thirds of jobs could be filled by those with at least intermediate-level skills. By 2020, more than 40% of jobs could be filled by graduates, up from 30% in 2004<sup>16</sup>.

Between January 2007 and January 2008, the number of people in Lambeth claiming Job Seekers allowance fell from 8853 to 7250, a 0.8% fall. The London employment rate currently stands at 69% and the working age benefit claim rate at 14.7%. The picture in Lambeth is of a weak labour market but showing ongoing signs of strong and stable improvement. The Lambeth employment rate currently stands at 66.7% July 06 – June 07 (63.1% Jan 06 – Dec 06)<sup>1</sup>, the working age benefit claim rate at May 2007 is 17.2 % (18.0% May 2006) is higher than the London average but has shown

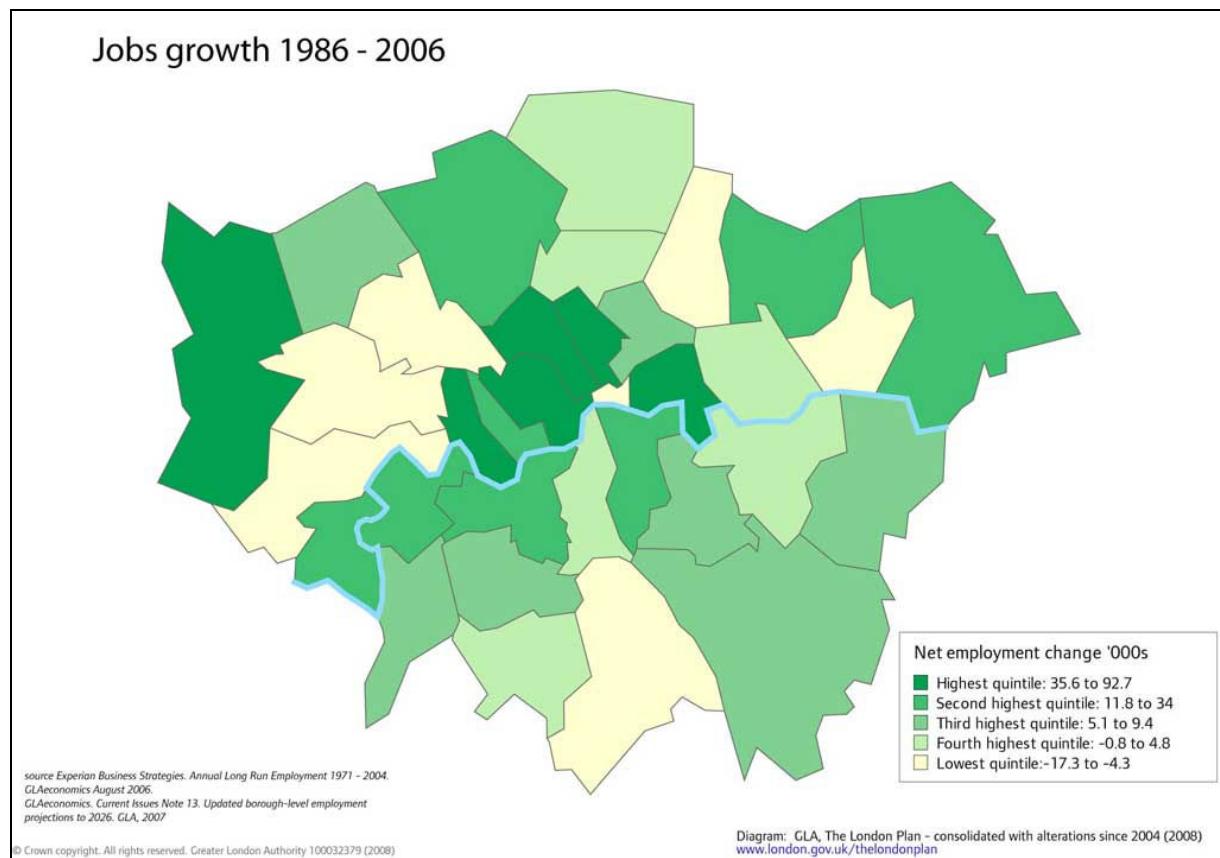
<sup>15</sup> Nomis web data for October 2005–September 2006

<sup>16</sup> Prosperity for All in the Global Economy – World Class Skills, HMSO December 2006

approximately 1% reduction within a 12 month period. In the neighbourhoods displaying the highest benefit claim rates, the number of claimants have reduced by approximately 2.4% from January 2007 to January 2008.

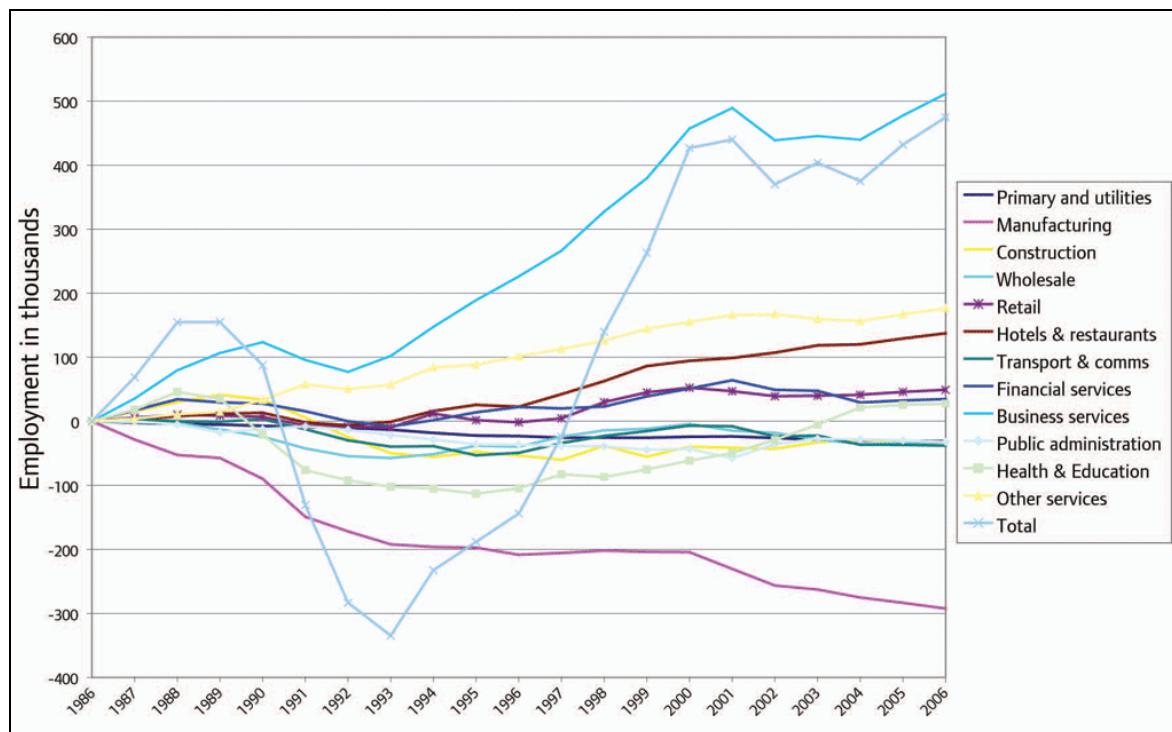
The effect of an increased gross value added for London over the past year up to current quarter 3 – 2007 and welfare benefit changes has stimulated greater demand for labour which has in turn improved the overall employment rate and the benefit rate decrease. But undoubtedly, supply side measures of better targeting, coordination, and referral arrangements between providers has had a positive bearing on the improving employment rate and the overall decrease in the benefit claim rate.

### Greater London Jobs Growth



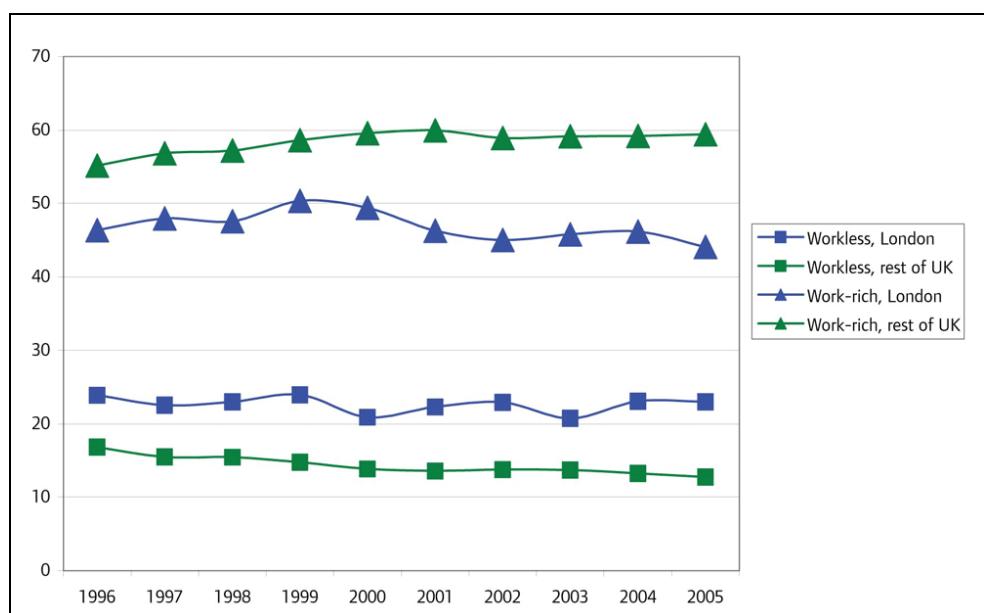
Source: Experian Business Strategies. Annual Long Run Employment 1971 – 2004. GLA economics August 2006

## Change in Employment Category, London 1986 - 2006



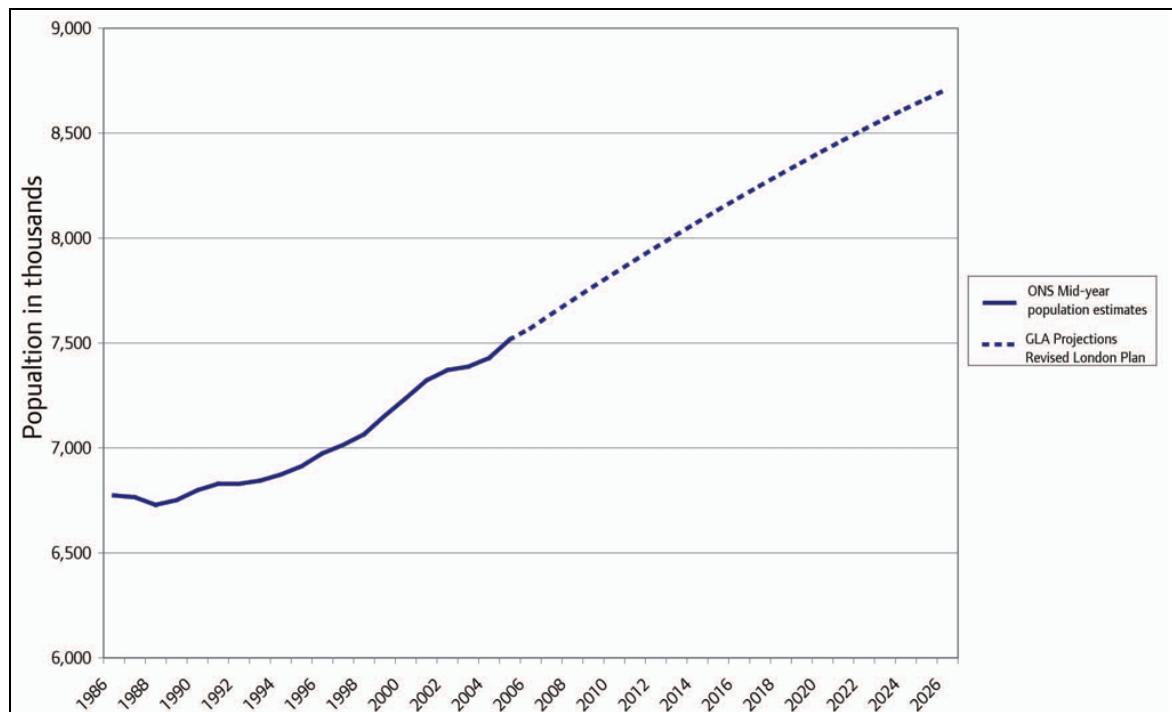
Source: Experian Business Strategies 2006 op cit. GLA economics Working Paper 20, 2007 op cit

## Households with Dependent Children by Employment Status



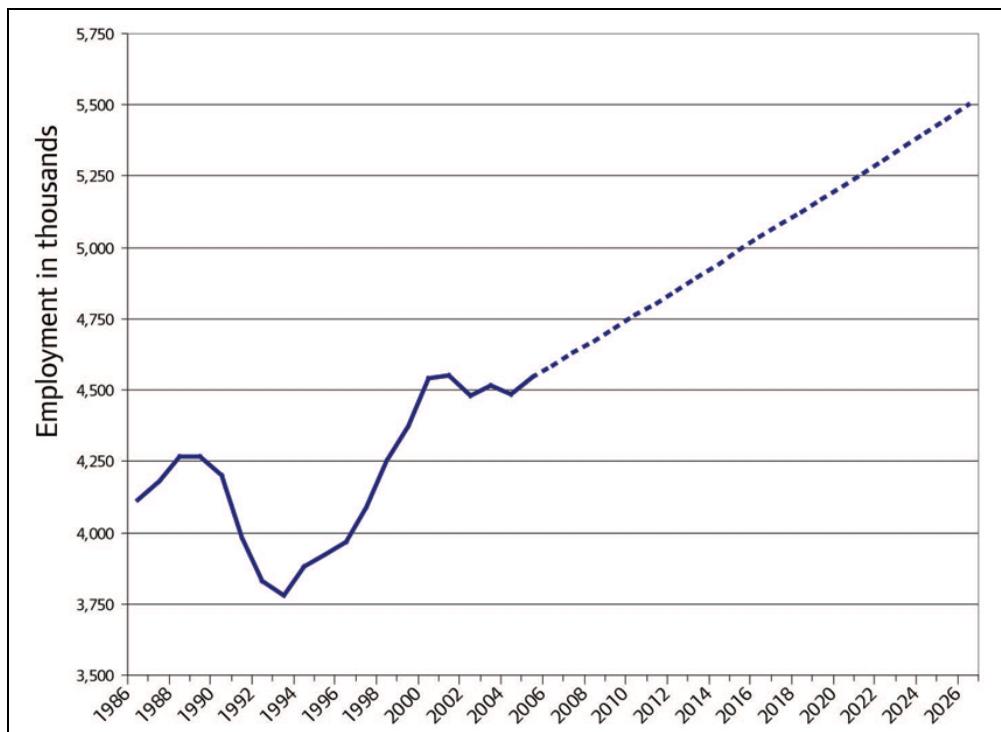
Source: Labour Force Survey

## **London's Population Change: actual and predicted 1986 - 2026**



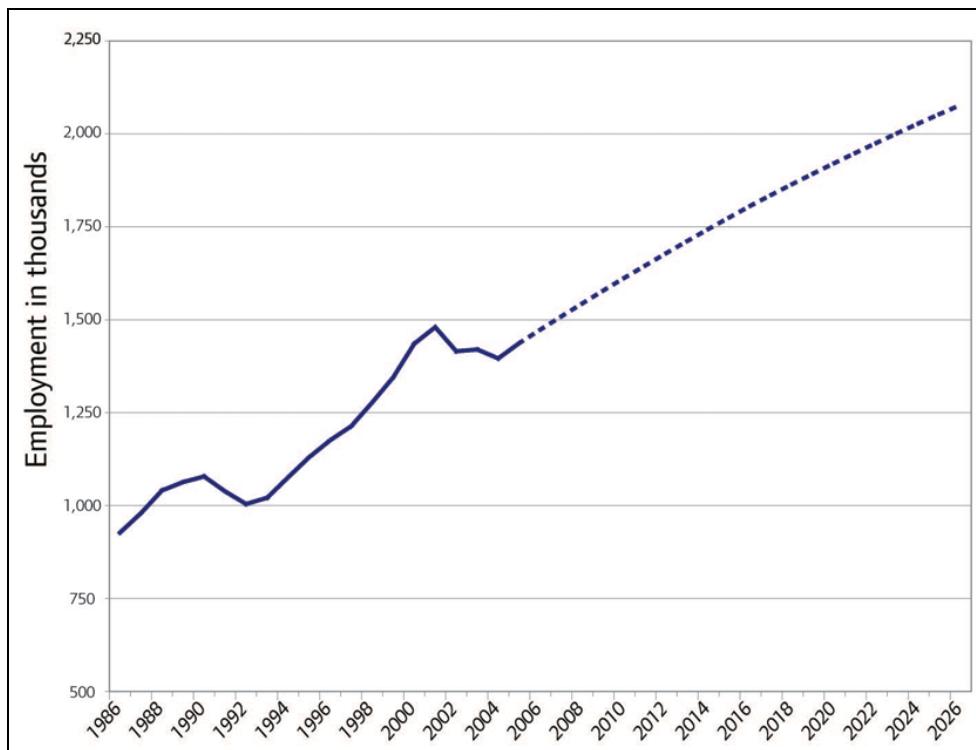
Source: GLA DMAG. 2006 Round Demographic Projections. DMAG Briefing 2006/32.  
GLA 2006. ONS Mid Year Estimates

## Total Employment, London 1986 - 2026



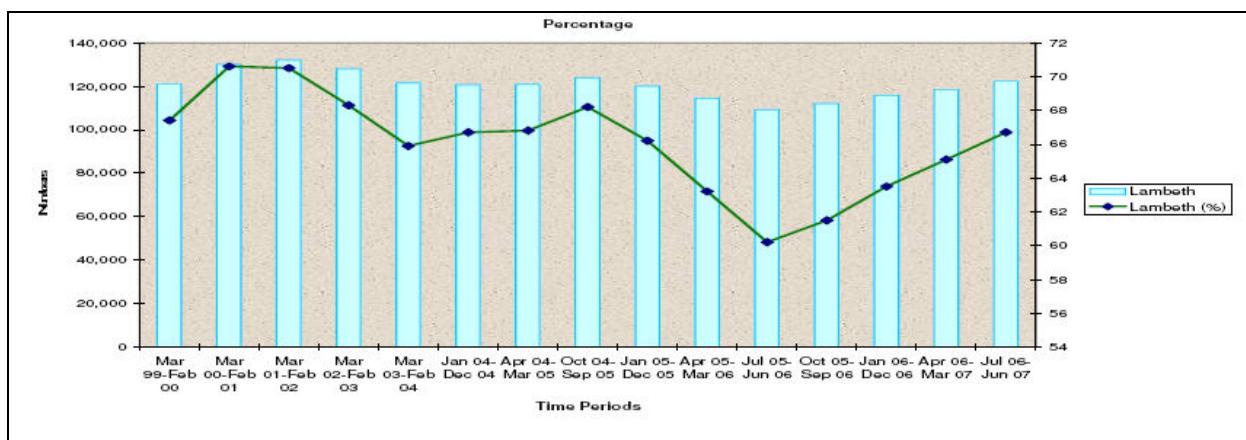
Source: Experian Business Strategies 2006 op cit. GLA economics Working Paper 20, 2007 op cit

**Figure 2 – Financial and Business Services Employment, London 1986 - 2026**



Source: Experian Business Strategies 2006 op cit. GLA economics Working Paper 20, 2007 op cit

### Lambeth's Employment

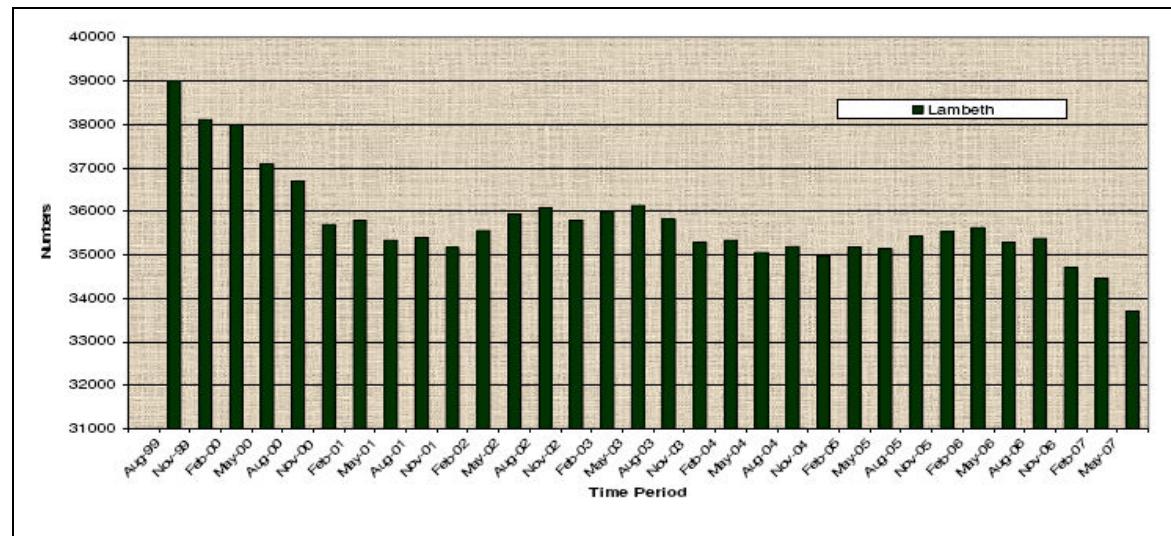


Source: Lambeth Employment and Skills Plan (2008-2009)

Lambeth's employment rate has shown some improvement, moving from a position of 65.1% in 2006 to 66.7% in June 06 – July 07. The overall employment rate for Lambeth since 2004 had dropped dramatically in 2005 & 2006, and has since improved over the 2006/2007 period, producing an upward trend at present.

Source: NOMIS

### **Lambeth Claimants**



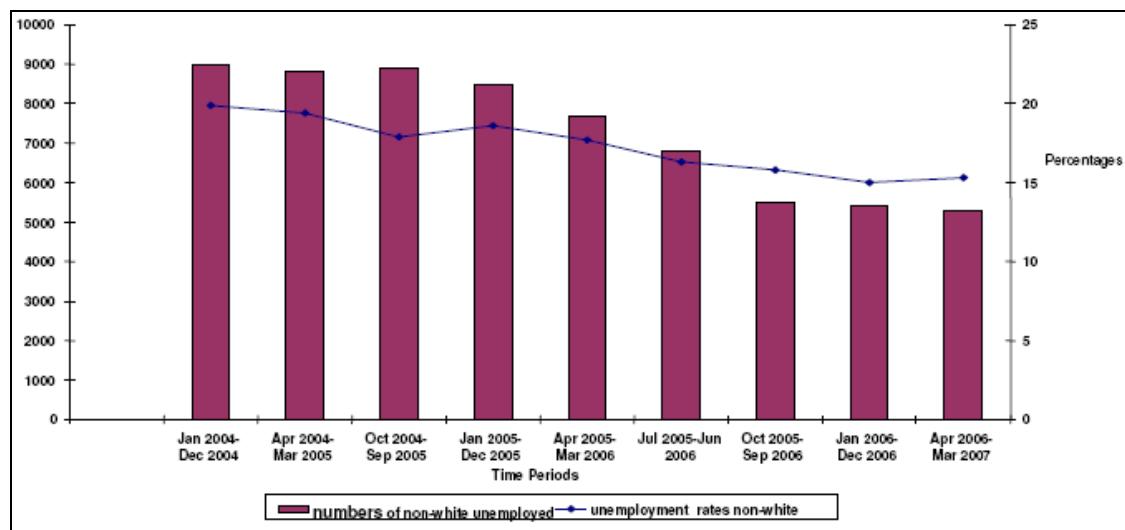
Source: Lambeth Employment and Skills Plan (2008-2009)

Total claimant counts has dropped slightly in Lambeth however the volume of people claiming lone parents and incapacity benefit remains high relative to the rest of London.

The overall trend appears to be downward, however in light of recent history there is a year on year equalising effect in terms of numbers of claimants over the period 2004 – 2007.

Source: NOMIS

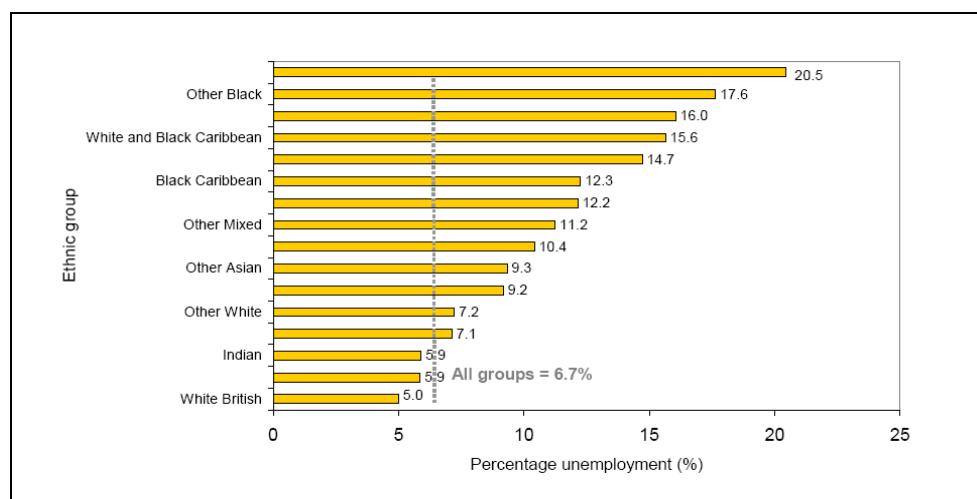
## Lambeth's Non-White Employment Rate



Source: Lambeth Employment and Skills Plan (2008-2009)

The non-white and/ or BME employment rate was in decline since 2005, and has historically been lower than the white employment rate. Since October 2006, the BME employment has levelled off with neither falls nor improvements to the overall BME employment rate.

## Unemployment rates of Greater London residents by ethnic group (census data), 2001



Source: GLA (Based on 2001 Census data)

Worklessness: Summary Statistics, April 2006 - March 2007			
	Lambeth	London	England

	<b>London Borough</b>	<b>Region</b>	<b>Country</b>
<b>Population Aged 18-24</b> No of Persons	24500	721200	4706200
<b>Population Aged 25-49</b> No of Persons	140000	3234300	17957500
<b>Population Aged 50-64 (male) and 50-59 (female)</b> No of Persons	25700	903600	7640400
<b>Economically Active</b> No of Persons	128600	3660900	24120800
<b>Economic Activity Rate</b> % of people	71.7	75	78.6
<b>Economic Activity Rate Confidence Interval</b> % of people	3.8	0.6	0.2
<b>In Employment</b> No of Persons	116900	3383300	22805200
<b>Employment Rate</b> % of people	65.1	69.3	74.3
<b>Employment Rate Confidence Interval</b> % of people	4	0.7	0.2
<b>Unemployed</b> No of Persons	12500	277500	1315500
<b>Unemployment Rate</b> % of people	9.6	7.6	5.5
<b>Unemployment Rate Confidence Interval</b> % of people	1.9	0.5	0.1
<b>Economically Inactive</b> No of Persons	50800	1219800	6581600
<b>Economic Inactivity Rate</b> % of people	28.3	25	21.4
<b>Economic Inactivity Rate Confidence Interval</b> % of People	3.8	0.6	0.2
<b>All Claimants</b> No of People	9043	165144	794231
<b>All Claimants – Rate</b> % of People	4.6	3.3	2.5
<b>Claimants Aged 18-24</b> No of Persons	2140	43575	236070
<b>Claimants Aged 18-24 Rate</b> % of People	8.7	6	5
<b>Claimants Aged 25-49</b> No of Persons	5505	94740	417050
<b>Claimant Aged 25-49 Rate</b> % of People	3.9	2.9	2.3
<b>Claimants Aged 50+</b> No of Persons	1270	24600	128530

<b>Worklessness: Summary Statistics, April 2006 - March 2007</b>			
	<b>Lambeth</b>	<b>London</b>	<b>England</b>
	<b>London Borough</b>	<b>Region</b>	<b>Country</b>
<b>Claimants Aged 50+ Rate</b> % of People	4.9	2.7	1.7
<b>Claimants for Less than 12 Months</b> No of Persons	7140	131225	660515
<b>Claimants for Less than 12 Months – Rate</b> % of People	80	80	84
<b>Claimants for Over 12 Months</b> No of Persons	1830	32820	129950
<b>Claimants for Over 12 Months – Rate</b> % of People	20	20	16

Source: Office for National Statistics

### Data Gaps and Assumptions

None.

### References

Office for National Statistics

2001 Census

Lambeth Employment and Skills Plan (2008-2009)

Experian Business Strategies 2006. GLA economics Working Paper 20, 2007

Experian Business Strategies. Annual Long Run Employment 1971 – 2004. GLA economics August 2006

GLA DMAG. 2006 Round Demographic Projections. DMAG Briefing 2006/32. GLA 2006. ONS Mid Year Estimates

Labour Force Survey

Nomis web data for October 2005–September 2006

### Key Issues

<b>London key issue</b>	<b>SA Issue for Lambeth</b>
High levels of unemployment and worklessness, particularly among Black, Asian, Ethnic and Minority groups, the removal of barriers to employment and the key role played by London's economy within the whole UK economy.	Increase the number of jobs in the local economy, including local jobs for local people





# Sustainability Appraisal and SEA of London Borough of Lambeth Submission Core Strategy

Sustainability Appraisal Report

Appendix 3 –Policy Appraisal  
Matrices

August 2009

August 2009

**London Borough of Lambeth Local Development  
Framework Core Strategy**  
**Sustainability Appraisal Report**

A report by **CAG Consultants and ENVIRON** for London Borough of Lambeth

Written by: Vicky Pearson, Emma Jones and Gerard Couper

Reviewed by: Niall Machin

August 2009

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# Introduction

This appendix presents the appraisal matrices used to appraise the following elements of the draft Core Strategy:

- Policy S1 – Delivering the vision and objectives Policy PN1 Waterloo
- Policy S2 - Housing Policy PN2 Vauxhall
- Policy S3 – Economic Development Policy PN3 Brixton
- Policy S4 – Transport Policy PN4 Streatham
- Policy S5 – Open Space Policy PN5 Clapham
- Policy S6 – Flood Risk Policy PN6 Stockwell
- Policy S7 Sustainable design and construction Policy PN7 Oval
- Policy S8 – Sustainable Waste Management Policy PN8 West Norwood and Tulse Hill
- Policy S9 – Quality of the Built Environment Policy PN9 Herne Hill
- Policy S10 – Planning Obligations Policy PN10 Local Centres

The impact of each of the policies/ preferred options on the SA objective is scored as follows:

Major positive	vv
Positive	✓
Major negative	XX
Negative	X
Uncertain	?
Neutral	O

The assessment is based on the current situation and trends for each objective, including where there are particular problems. This information is contained in the LDF Core Strategy SA Scoping Report, and has been referred to throughout the process of compiling the matrices. Unless specified otherwise, the potential effects identified within the matrices are direct and permanent.

Many of the SD objectives in relation to environmental sustainability seek an improvement to the current situation, e.g.

- 'improve the quality of surface waters and groundwater, and to achieve the wise management and sustainable use of water resources'.
  - 'ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates'.
- Therefore, faced with worsening trends on many environmental sustainability issues, where Core Strategy policies do not contain policy content to improve the current situation, then they have been scored as negative. This is based on the proposed population growth and its associated impact and the expectation that worsening trends will be continued in the absence of any indication to the contrary.

Vision and Strategic Objectives		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement		
SA Objectives		Short term	Med term	Long term	SOCIAL		
1. Crime and safety.	Ensuring safe communities with reduced crime and disorder.	✓✓	✓✓	✓✓	The vision and strategic objectives seek to improve safety in the borough, for example creating safer environments, town centres and communities, designing out crime, tackling and adapting to climate change and increasing resilience to terrorism.		
2. Health and well being.	Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓✓	✓✓	✓✓	The vision and strategic objectives seek to create healthy neighbourhoods, with excellent local health services. There is a strategic objective specifically on health which seeks to improve health and well-being and reduce health inequalities by delivering a network of Neighbourhood Resource Centres for primary health care, support the reconfiguration of hospital premises, and by encourage healthy lifestyles in the design of the built environment. Other objectives which address the key determinants of health or related issues, include:		
					<ul style="list-style-type: none"> <li>• More affordable housing and better quality housing;</li> <li>• Improving safety;</li> <li>• Improving employment opportunities;</li> <li>• Promoting active travel (walking and cycling); and</li> <li>• Improving public transport reducing reliance on the car.</li> </ul>		
3. Access and services.	Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓✓	✓✓	✓✓	<p>Strategic objective 13 seeks to develop and sustain stable neighbourhoods with a high quality, liveable residential environment, respect for local amenity, good access to local services and transport, and mixed populations (including different ethnic groups, faiths and sexual orientations, the young, the elderly and people with disabilities).</p> <p>Accessibility is also stressed in the vision.</p> <p>Objectives 9 and 10 refer to the education and health infrastructure required to meet growth.</p>		
4. Provision of essential infrastructure.	To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	✓?	✓?	✓?	<p>Infrastructure provision is stressed in the vision and various objectives seek to address infrastructure issues in relation to growth:</p> <ul style="list-style-type: none"> <li>• Objective 7 seeks to provide the essential physical, social and green infrastructure to support population and economic growth through the co-ordinated delivery of infrastructure programmes by Lambeth First partners and statutory undertakers.</li> <li>• Objective 6 addresses sustainable urban drainage and water supply issues.</li> <li>• Objective 8 seeks to improve public transport capacity.</li> <li>• Objectives 9 and 10 refer to the education and health infrastructure required to</li> </ul>		

<b>Vision and Strategic Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
				<p>meet growth.</p> <ul style="list-style-type: none"> <li>• Objective 11 seeks new open space where-ever possible including through an extension to Jubilee Gardens.</li> </ul> <p>PPS12 places a strong emphasis on infrastructure planning. However, there remain uncertainties about the delivery of such infrastructure, in particular:</p> <ul style="list-style-type: none"> <li>○ Timing: there is a danger that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front<sup>2</sup>;</li> <li>○ Funding (and land required?) for some of the proposed infrastructure schemes has not been identified (e.g. some of the school place provision);</li> <li>○ The proportion of open space per resident ('green infrastructure') is likely to reduce as the population increases whilst new open space opportunities are extremely limited.</li> </ul> <p>Area policies should provide greater clarity on local need.</p>
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	✓	✓	✓	<p>Diversity is recognised as a key strength, and there are references to specific equality groups such as different ethnic groups, faiths and sexual orientations, the young, the elderly and people with disabilities</p> <p>Tackling worklessness will greatly assist this objective. A number of the strategic objectives will help to ensure equitable outcomes for all communities (particularly those most liable to experience discrimination, poverty and social exclusion), including:</p>

<sup>1</sup> We note the PINs comments on this issue: Much greater clarity is thus needed to explain what [infrastructure] improvements are necessary, by when, to enable the planned scale of growth to be delivered, whether these schemes are in providers' programmes and whether they are funded and how much development could take place if the uncommitted schemes did not take place and so on. ... Where it is known that additional significant new infrastructure is needed in particular places eg new schools I would suggest that such need (and broad timing) is included in the place shaping policy for that area'.

<sup>2</sup> For example, Lambeth Infrastructure Programme (2009) highlights the time taken to plan and deliver water and sewerage infrastructure: 'It is important not to under-estimate the time required to deliver the necessary infrastructure. Local network upgrades typically take about 18 months, and upgrades to treatment works can take between three and five years. ... It is essential to ensure that water and sewerage infrastructure is in place ahead of development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems. Thames Water has no statutory powers to require developers to provide the additional water supply and sewerage infrastructure capacity, and is therefore reliant on Local Planning Authority powers to ensure that infrastructure is provided ahead of development through policies in the LDF and phasing or conditions in relation to planning applications'.

<b>Vision and Strategic Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
				<ul style="list-style-type: none"> <li>• More affordable housing;</li> <li>• Improving safety;</li> <li>• Improving employment opportunities (particularly local jobs for local people);</li> <li>• Providing good access to local and community services;</li> <li>• Regenerating the London Plan Opportunity Areas.</li> <li>• The promotion of cohesive and mixed communities should assist in promoting equity and fairness between groups.</li> </ul> <p>Improving design, including sustainable design and open spaces will also improve the local environment for all communities, including those suffering disadvantage.</p> <p>Increasing the overall supply, mix and quality of housing, including affordable housing and key worker and family housing, will positively contribute to this objective.</p> <p>The promotion of 'high density' environments could compromise local amenity: design will be important (equally promoting high densities in certain parts of the borough could serve to protect 'lower density' amenity elsewhere).</p>
5. Housing: Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	✓	✓	✓	
6. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓✓	✓✓	✓✓	<p>The vision and strategic objectives appear to be geared to the delivery of this objective.</p>

## **ENVIRONMENTAL**

<b>Vision and Strategic Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
7. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓✓	✓✓	✓✓	<p>Objectives 15 and 16 aim to:</p> <ul style="list-style-type: none"> <li>• Create and sustain distinctive local places through excellent design of buildings and the public realm, valuing heritage, identity, cultural assets and the natural environment.</li> <li>• Protect and enhance the historic built environment, the setting of the Palace of Westminster World Heritage site and strategic views by working in partnership with English Heritage, neighbouring boroughs and community groups.</li> </ul> <p>Elsewhere in the vision there are references to excelling in sustainable design as well as the management of the built environment and open spaces.</p> <p>The vision highlights the issue of seeking high density development whilst also ensuring sustainable design and good management of the built environment and open space.</p>

<b>Vision and Strategic Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
8. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓	✓	✓	<p>The vision and strategic objectives contain a number of aspirations and policies which should contribute positively to this objective. In particular:</p> <ul style="list-style-type: none"> <li>• The capacity of the public transport infrastructure, including the inter-changes at Waterloo, Vauxhall and Brixton, will have increased sufficiently to accommodate all those travelling to, from and through the borough for work, shopping, recreation and tourism</li> <li>• Work in partnership with government, Transport for London, Network Rail and major developers to increase public transport capacity and accessibility, reduce reliance on the private car, promote walking and cycling, and provide alternatives to road-based freight transport</li> <li>• Promotion of local jobs for local people</li> <li>• Promotion of good access to local services and facilities,</li> <li>• Encouragement of healthy lifestyles in the design of the built environment; and</li> <li>• Seeking carbon emission reductions through minimising the need to travel.</li> </ul> <p>The objectives referred to above and the promotion of high density developments, presuming these are located in areas well served by public transport, should assist in promoting more sustainable forms of transport and reducing the need to travel. Therefore, in determining applications for development and any conditions attached to implementation, including those relating to the phasing of developments, account should be taken of the availability of adequate public transport access and capacity, and the development's transport impact.</p> <p>Public transport capacity is a key issue in Lambeth, including lack of fixed link lines, lack of stations, lack of capacity at stations and on the lines themselves. In some cases significant developer contributions will be needed to secure them/bring them forward. Individual developments may not, in themselves, have a significant impact on public transport capacity but may add to existing problems, or impact on future predicted problems.</p> <p>As the Scoping Report highlights, road traffic is the primary cause of air pollution in Lambeth, as well as the rest of London, affecting health, making breathing problems, such as asthma, and heart problems worse. The results of the Council's own research showed that, despite improvements in air quality in Lambeth over the next 4 to 5 years, two pollutants, nitrogen dioxide and fine particulates, are likely to fail Government targets. Similarly, London is predicted to fail the European limit values for PM10, NO2 and Ozone (O3). In 2007 75% of Lambeth was covered by Air Quality Management Areas (AQMA) compared to approximately 50% of London (2003).</p>

<b>Vision and Strategic Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
9. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	√?	√?	√?	<p>Objective 5 seeks to safeguard and increase biodiversity through co-ordinated implementation of the Lambeth Biodiversity Action Plan. However, the drive for higher density development and the push to meet housing targets is likely to place a strain on green spaces of wildlife value that provide local nature conservation amenity. Design policies and other policies to protect local biodiversity will need to address this possible tension.</p>
10. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	√	√	√√	<p>The vision commits the borough to be at the forefront of tackling and adapting to climate change through a variety of means.</p> <p>Strategic objectives 4 and 6 state:</p> <ul style="list-style-type: none"> <li>• Reduce carbon emissions by minimising the need to travel and maximising energy efficiency and renewable energy generation in buildings and area regeneration schemes.</li> <li>• Enable Lambeth to adapt to the effects of climate change, including drought and flood risk, through the design of the built environment, retention of existing trees, urban greening, and sustainable urban drainage and protection of the supply or water</li> </ul> <p>Other strategic objectives which will also assist in achieving this objective are</p> <ul style="list-style-type: none"> <li>• High density living and sustainable design;</li> <li>• Various initiatives which should reduce the need to travel, reduce reliance on cars or promote more sustainable travel modes.</li> </ul> <p>Flood risk is dealt with by objective 15.</p>
11. Water quality and resources. To improve the quality of surface waters and groundwater, and to achieve the wise management and sustainable use of water resources.	√?	√?	√?	<p>Strategic objective 6 addresses water issues as part of adapting to climate change. Objective 7 seeks to provide the essential physical infrastructure to support population and economic growth. Whilst not referring to water and sewerage specifically, we would expect this objective to address these infrastructure needs. Objective 5 addresses biodiversity and will protect the value of wetland wildlife sites.</p>

<b>Vision and Strategic Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
12. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates.	✓?	✓?	✓?	<p>Strategic objective 12 seeks to contribute to the delivery of Lambeth's Sustainable Waste Management Strategy by maintaining an appropriate supply of land for waste management and operational use and seeking the most effective waste management facilities within new developments.</p> <p>The London Plan borough apportionment of waste to be managed in Lambeth of 345,000 tonnes per annum by 2020 (municipal solid waste and commercial/industrial waste) will be a challenge given that the current existing licensed capacity is 11,000 tonnes. The LDF will need to identify and allocate waste management sites to meet this apportionment. Given the borough's strong desire to maintain its employment base, this may create tensions as the London Plan identifies employment sites as being broadly appropriate for additional waste facilities.</p>
13. Air quality. To improve air quality.	✓	✓	✓	<p>Air quality or pollution issues are not referred to in the vision or strategic objectives. However, as referred to in the transport and travel objective above (9), the vision and objectives should contribute to the promotion of more sustainable transport modes and to a reduction in the need to travel. As poor air quality is primarily caused by road traffic, these initiatives should help to improve air quality. As the Scoping Report highlights, road traffic is the primary cause of air pollution in Lambeth, as well as the rest of London, affecting health, making breathing problems, such as asthma, and heart problems worse. The results of the Council's own research showed that, despite improvements in air quality in Lambeth over the next 4 to 5 years, two pollutants, nitrogen dioxide and fine particulates, are likely to fail Government targets. Similarly, London is predicted to fail the European limit values for PM10, NO2 and Ozone (O3). In 2007 75% of Lambeth was covered by Air Quality Management Areas (AQMA) compared to approximately 50% of London (2003).</p>

**ECONOMIC**

<b>Vision and Strategic Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
14. Education and skills. To maximise the education and skills levels of the population.	✓	✓	✓	<p>The vision provides a clear aspiration for a skilled workforce and for excellent local education services for Lambeth's communities. This is emphasised by the sentence: 'the achievements of Lambeth's young people will be widely celebrated'. Strategic objective 9 seeks provision for school places, whilst objective 3 seeks contributions to skills support programmes.</p> <p>The provision of local schools has been identified as an issue in Lambeth and provision of sufficient school places is an important aspect of sustainability, not only in terms of educational achievement, but also in terms of reducing the need to travel (the school run being a significant contributing factor to congestion and CO<sub>2</sub> emissions).</p>
15. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓	✓	✓	<p>Strategic objectives 2 and 3 would contribute positively to this objective and there is a particular emphasis on 'local jobs for local people'.</p> <p>There is nothing in the vision and objectives about the social and environmental performance of businesses but these issues are perhaps too detailed for this strategy.</p>
16. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	?	?	?	<p>Strategic objective 17 supports the regeneration and renewal of London Plan Opportunity Areas. These areas have been identified as being capable of accommodating substantial new jobs or homes, rather than on any deprivation criteria. The London Plan identifies 'Areas for Regeneration' as being those areas where there is substantial deprivation (within the 20% most deprived wards in London) and in need of regeneration. Most of the northern half of the borough comes into this category. The strategic objectives should also target the regeneration of such areas of regeneration.</p> <p>There is nothing in the vision and objectives about re-using previously developed land and buildings.</p>
17. Employment. Increase the amount of and access to employment generating activities and offer everyone the opportunity for rewarding, well-located and satisfying employment.	✓	✓	✓	<p>Strategic objectives 2 and 3 would contribute positively to this objective and there is a particular emphasis on promotion of local employment and business retention.</p> <p>Could be a possible tension with the competing use for land, especially from housing, but also other essential infrastructure such as waste management facilities.</p>

<b>Vision and Strategic Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b> The vision and strategic objectives 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 to tackle climate change (mitigation and adaptation), address infrastructure issues, provide local jobs and services and promote sustainable modes of travel. The vision and strategic objectives have taken on board many of the issues previously highlighted by the SA.				
<b>Uncertainties</b> There remain uncertainties about the delivery of essential infrastructure required for growth, in particular:				
	<ul style="list-style-type: none"> <li>○ Timing: there is a danger that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front;</li> <li>○ Funding (and land required?) for some of the proposed infrastructure schemes has not been identified (e.g. some of the school place provision);</li> <li>○ The proportion of open space per resident ('green infrastructure') is likely to reduce as the population increases whilst new open space opportunities are extremely limited.</li> </ul>			
				<b>Recommendations / Mitigation</b>
				<ul style="list-style-type: none"> <li>• The strategic objectives and Core Strategy policy should also target the regeneration of London Plan Areas of Regeneration.</li> </ul>

Policy S1 – Delivering the vision and objectives		What is the predicted effect on each SA objective?				Justification for assessment and recommendations for mitigation/improvement	
SA Objectives		Short term	Med term	Long term	SOCIAL		
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	✓	✓	✓	✓	Will help tackle crime and the fear of crime through: <ul style="list-style-type: none"><li>• Regeneration schemes;</li><li>• Improving the public realm;</li><li>• Meeting community needs; and</li><li>• Rigorous planning enforcement.</li></ul>		
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓?	✓?	✓?	✓?	Will help promote health and well being through: <ul style="list-style-type: none"><li>• Regeneration: targeting Areas for Regeneration will assist in combating health (and wider, including child poverty) inequalities as these areas are the most deprived parts of London/Lambeth;</li><li>• Improving the public realm;</li><li>• Meeting community needs and infrastructure provision.</li></ul> We are assuming that health care providers are included under point (d) in terms of service providers, in terms of securing the necessary health care facilities to accommodate growth. In terms of health care infrastructure, funding for the new Neighbourhood Resource Centres has not yet approved by the NHS Lambeth Board.		
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓	✓	✓	✓	Includes partnership working to deliver social infrastructure, as well as local regeneration schemes. Provision of a variety of physical, social and green infrastructure is a key theme of the plan, as is promoting liveable neighbourhoods.		
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to	✓?	✓?	✓?	✓?	Provision of physical, social and green infrastructure in order to keep pace with proposed growth is a key theme of the plan. Point (d) aims to work in partnership with service providers to ensure the delivery of additional infrastructure required, including securing financial contributions. Information about the delivery of essential infrastructure is set out in the Infrastructure Schedule in Annex 2. In the case of some types of infrastructure, delivery does not appear to be certain,		

		e.g. primary school places. The need for an additional primary 5460 places has been identified through to 2020: aimed to be met by a combination of expanding existing schools and building new ones. The CS states that 'more land and funding are required to build additional schools (both primary and secondary) to meet projected future demand over the next ten years. The Infrastructure Programme states:	<i>Timescales will depend on site identification and funding. Sources will include Basic Needs Funding, and the Council's capital programme.</i>
		In terms of health care infrastructure, funding for the new Neighbourhood Resource Centres has not yet approved by the NHS Lambeth Board.	
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	✓	✓	This policy should promote the delivery of equitable outcomes for all, including Lambeth target equality groups by: <ul style="list-style-type: none"> <li>• supporting local distinctiveness;</li> <li>• delivering regeneration, especially in London Plan 'Areas for Regeneration' which contain the most deprived parts of London/Lambeth; and</li> <li>• working with partners to deliver social infrastructure (as well as physical and green infrastructure).</li> </ul> The policy doesn't reference equality target groups beyond the needs of faith groups (new community premises).
6. Housing. Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	✓	✓	The policy does not specifically refer to housing. However, a number of aspects of delivery should work positively towards this objective, including: <ul style="list-style-type: none"> <li>• provision of essential infrastructure (social, physical, green);</li> <li>• building on the local distinctiveness of neighbourhoods;</li> <li>• regeneration and public realm improvements.</li> </ul>
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term sustainable lifestyles and a sense of place.	✓?	✓?	The policy scores positively on this objective as it aims to deliver improvements to the public realm, build on local distinctiveness and provide essential social, physical and green infrastructure. The partnership approach should also assist community engagement and good governance, and contribute to social cohesion. However, there is uncertainty regarding the delivery of new infrastructure and the impact this might have on liveability and place.

ENVIRONMENTAL			
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓ ✓	✓	The policy aims to deliver development that builds on local distinctiveness, deliver green infrastructure and improve the public realm. Attention to planning enforcement may also assist in terms of this objective.
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓? ?	✓? ?	The policy aims to strengthen the role of town centres and assist in the delivery of essential physical infrastructure (which must include transport infrastructure) which should contribute positively to this objective. It contains nothing on sustainable travel or reducing the need to travel. However, we note that sustainable transport is dealt with by other Core Strategy policies.
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	?	?	Assisting in the delivery of green infrastructure should contribute to biodiversity. Improving public access can sometimes impact negatively on certain valued wildlife habitats and species. This is less likely to be the case in Lambeth where improving people's access to nature is a relevant objective.

11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	?	?	?	As worded, this policy would not contribute to tackling climate change and reducing greenhouse gases. On the contrary, development without any sustainability or low carbon caveats could be said to increase carbon emissions (from building construction, building use and increased travel). However, we note that policies elsewhere in the Core Strategy address climate change issues, and targets/ standards are set to be addressed by other DPDs.
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	?	?	?	As worded, this policy would not contribute to water conservation or flood risk management. On the contrary, development without any sustainability caveats could be said to increase water use and demand (from building construction and building use). Physical infrastructure presumably includes water and sewerage infrastructure. However, policies elsewhere in the Core Strategy address water issues and targets/ standards are set to be addressed by other DPDs.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	?	?	?	As worded, this policy would not contribute to sustainable waste management. The scale of waste to be handled in Lambeth to 2026 needs to be established with consequent assessment of the additional land needed for its handling. Physical infrastructure includes waste management infrastructure, but there is a lack of clarity in this and other policies about how the Borough will meet its waste needs. We note that policies elsewhere in the Core Strategy address waste issues and targets/ standards are set to be addressed by other DPDs.
14. Air quality. To improve air quality.	?	?	?	As worded, this policy would not contribute to improvements in air quality. On the contrary, development without any sustainability caveats could be said to worsen air quality through increased development and travel. However, policies elsewhere in the Core Strategy address air quality issues.

## ECONOMIC

<p>15. Education and skills. To maximise the education and skills levels of the population.</p>	<p><input checked="" type="checkbox"/>?</p> <p><input checked="" type="checkbox"/>?</p> <p><input checked="" type="checkbox"/>?</p> <p><input checked="" type="checkbox"/>?</p>	<p>Nothing specific on education or skills, but social infrastructure will include the provision of more schools and more school places (but see our comments on objective 4, above).</p> <p>However, the policy to expand existing schools could pose a risk to educational quality as local opinion demonstrates:</p>
		<p><i>'But now Lambeth's response to the places shortage is causing great anger among Rosendale parents. The council is demanding an extra class for this autumn's intake at the school - four-form entry in a school that already has more than 620 pupils. Parents are justifiably worried that such expansion will put at risk its success; all the research shows that on average schools do better when they stay small'</i> (Herne Hill Forum, June 2009).</p>
		<p>The policy of seeking contributions from developers for the provision of local infrastructure should assist in improving the job prospects of local people.</p>

18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓?	✓?	✓?	The policy of seeking contributions from developers for the provision of local infrastructure should assist in improving the job prospects of local people.
<p><b>Conclusions</b> The policy concerns the delivery of the Strategy's vision and objectives, including the social, green and physical infrastructure required to accommodate the proposed growth. It targets key areas of the borough to deliver development and regeneration, which scores well over the range of social and economic objectives. Respecting local distinctiveness scores well on protection of the built heritage. There is no detail in the policy on the suite of environmental objectives (including climate change), sustainable design or sustainable transport. Environmental standards/ targets are set to be addressed in other DPDs. However, there is an uncertainty regarding the delivery of much needed infrastructure, such as school places and health care provision, and what impact this might have on quality of life issues within the Borough.</p>				

### Uncertainties

Delivery of infrastructure, in terms of funding and site allocations.

### Recommendations/Mitigation

Greater specificity on infrastructure provision would be helpful in order to explain what improvements are necessary to enable the planned scale of growth to be delivered. Annex 2 could clarify whether these schemes are in providers' programmes and whether they are funded. There is then the issue of how much growth/development could occur if the uncommitted schemes did not come to fruition.

Policy S2 – Housing		What is the predicted effect on each SA objective?				Justification for assessment and recommendations for mitigation/improvement			
SA Objectives		Short term	Med term	Long term	SOCIAL				
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	O	O	O	✓	Policy S9 Quality of the Built Environment deals with designing out crime in new developments.				
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓	✓		✓	The policy requires new homes to be built to Lifetime Homes standards, which will ensure that new homes are suitable for peoples' changing needs over their lifetime. 10% of new homes need to have wheelchair access.				
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓			✓	This policy seeks levels of residential density consistent with London Plan guidelines, having regard to the provision of other uses on the site, availability of local services, and access to and capacity of public transport.				
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	O	O	O		This policy does not mention provision of essential infrastructure but other policies within the Submission Core Strategy deal with this.				
5. Equality and	✓	✓	✓	✓	The policy requires new homes to be built to Lifetime Homes standards, which will				

<b>Policy S2 – Housing</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.				ensure that new homes are suitable for peoples' changing needs over their lifetime. 10% of new homes need to have wheelchair access. Policy S1 also deals with diversity of communities and ensuring maximum access for people with disabilities and a child-friendly environment.
6. Housing. Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	✓✓	✓✓	✓✓	The policy will help the achievement of this SA Objective. The policy will help achieve the London Plan borough housing targets and the 50% target for affordable housing provision. The policy stipulates the London Plan breakdown of the affordable housing of 70% social housing and 30% intermediate provision. The policy does not make reference to tackling homelessness but this is discussed in the supporting text.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	O	O	O	This is not mentioned within the policy but design is dealt with elsewhere in the Core Policies.

<b>Policy S2 – Housing</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued open space, valued views and historic assets.	O	O	O	The quality of the built environment is not addressed within this policy but is dealt with in Policy S9.
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	O	O	O	Travel and transport is not dealt with in this policy but it is dealt with in policy S4
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	O	O	O	The impact of housing developments on biodiversity is not mentioned within this policy but it is dealt with in part within policies S5 and S9.

<b>Policy S2 – Housing</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	O	O	O	The policy does not mention sustainable design or construction which will be essential in new housing developments, particularly of the scale proposed. However, these issues are dealt with within policy S7 Sustainable Design and Construction.
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	O	O	O	The policy does not mention sustainable design or construction, however, this is dealt with within policy S7 Sustainable Design and Construction.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	O	O	O	The policy does not mention sustainable waste management or the impact on waste arising from new housing development. Sustainable waste management in relation to new housing construction and operation will need to be dealt with within the Development Management DPD.
14. Air quality. To improve air quality.	O	O	O	The policy does not mention impacts of housing development on traffic or impacts on air quality from construction. Transport is dealt with within policy 4. It is assumed that the environment impacts of housing developments, including in relation to air quality, will be dealt with within the Development Management DPD.

<b>Policy S2 – Housing</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
15. Education and skills. To maximise the education and skills levels of the population.	O	O	O	This policy does not address skills and education but this is dealt with under policy S4 and policy S1.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓	✓	✓	This policy aims to meet local housing needs, including those of families. Through ensuring the provision of a range of housing this policy supports the achievement of this SA Objective by providing housing for people working within the Borough.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓	✓	✓	New housing developments could regenerate some areas.

<b>Policy S2 – Housing</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	O	O	O	This policy does not address worklessness but this is dealt with under policy S3.
<p><b>Conclusions</b></p> <p>The previous SA recommendation to add the affordable housing breakdown of 70% social housing and 30% intermediate provision to the policy has been taken on board.</p> <p>The policy sets out plans to deliver 7,700 net additional dwellings across the borough between 2010/11 and 2016/17 in line with London Plan targets, and a further 8,800 more homes by 2024/25. It is therefore difficult to differentiate between short, medium and long term as the benefits of housing provision and other benefits that will come with this, such as affordable housing provision and homes built to Lifetime Homes standards should be provided throughout this period of time.</p> <p>The policy is considered to support the achievement of SA Objectives relating health and well being, equality and diversity, built and historic environment, local economy, and regeneration and efficient use of land. The policy does not refer to sustainable construction but Policy S7 Sustainable Design and Construction deals with some of these issues and the Development Management DPD will need to deal with these issues in detail.</p>				

#### **Uncertainties**

Although it is not recorded in the matrix, it should be noted that there could be some uncertainty relating to the delivery of housing by private house builders, due to the current market forces. However, this is beyond the control of the policy. It is assumed that Development Management policies and supporting SPD will address the potential impact of housing development.

#### **Recommendations / Mitigation**

Sustainable waste management in relation to new housing construction and operation will need to be dealt with within the Development Management DPD.

<b>Policy S3 – Economic Development</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	<b>SOCIAL</b>		
1. Crime and safety.	Ensuring safe communities with reduced crime and disorder.	✓	✓	✓	The policy supports this SA Objective through making improvements to and maintenance of community safety, which is a particular priority with regards to the regeneration of Lambeth's town centres.		
2. Health and well being.	Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓	✓	✓ / ?	The policy supports the regeneration of town centres including specialist shops and market space and safeguards local shops and public houses which all help to maintain community spirit and social interaction.		
3. Access and services.	Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓✓	✓✓	✓✓	The policy supports the regeneration of Lambeth's town centres and safeguards local shops. The policy seeks improvements to the public realm in town centres, including increased pedestrian and public transport accessibility. It also supports mixed use development and the location of major office developments, large hotels, major leisure and cultural activities, tourist attractions and retail development in key accessible locations.		
4. Provision of essential infrastructure.	To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	✓	✓	✓	The policy is not directly concerned with the provision of what is classed as essential infrastructure; however, it complements the provision of public transport services and social infrastructure.		
5. Equality and diversity.	To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	✓	✓	✓ / ?	The policy promotes the regeneration of town centres within Lambeth including seeking improvements to the public realm for pedestrians. The policy seeks to safeguard local shops, public houses, specialist shops and markets, which will support different cultural retail sectors. It also supports a range of employment opportunities which could provide opportunities for all sectors of the community and training schemes to maximise local employment opportunities, through the Lambeth Employment and Skills Programme.		

<b>Policy S3 – Economic Development</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>			
6. Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	O	O	O	O	There is no relationship with this SA Objective.		
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓✓	✓✓	✓✓	The policy supports mixed use developments and encourages walking, cycling and promotes opportunities for social interaction such as at markets and public houses. It also supports the regeneration of Lambeth's town centre including improvements to the public realm. In addition, the policy could also make reference to seeking high quality public green space in connection with public areas such as in town centres, especially where improvements to the public realm are mentioned and where regeneration is being sought.			
<b>ENVIRONMENTAL</b>							
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓	✓	✓	The policy seeks the regeneration of Lambeth's town centres and will direct major development, including tourist attractions and leisure and cultural activities, to existing major centres, such as the Central Activities zone. This should help protect the historic environment although any new development will be subject to Development Control policies which will also help control development design and impact.			
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓✓	✓✓	✓✓	The policy directs major office developments, large hotels and apart-hotels, major leisure and cultural activities and tourist attractions to key central areas and areas with good public transport. This accords with London Plan targets to maintain at least 50% of B1 development in PTAL zones 5-6. The policy seeks the improvement of the public realm within town centres, including public transport accessibility and supports mixed use development and live-work units in relation to B or D class uses, which will help reduce the need to travel.			

<b>Policy S3 – Economic Development</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	O	O	O	<p>The policy does not work against this SA Objective but the policy could be improved by adding reference to seeking high quality public green space in connection with public areas such as in town centres, especially where improvements to the public realm are mentioned and where regeneration is being sought. The Lambeth Open Space Strategy recommends a doubling of the number of good quality open spaces in the Borough and this policy could help achieve this if the wording is altered slightly, as above.</p>
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	✓	✓	✓	<p>The policy seeks to reduce travel through the promotion of mixed use developments and live-work units, and also directs major commercial, retail, leisure etc developments to key centres with good public transport accessibility. This strategy works towards the achievement of this SA Objective and meeting London Plan targets for CO<sub>2</sub> reduction of:</p> <p>A 60% reduction of CO<sub>2</sub> emissions by 2050:</p> <ul style="list-style-type: none"> <li>• 15% by 2010</li> <li>• 20% by 2015</li> <li>• 25% by 2020</li> <li>• 30% by 2025.</li> </ul> <p>(against 1990 base)</p>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	O	O	O	<p>There is no relationship with this SA Objective.</p>
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	✓	✓	✓	<p>The policy safeguards key industrial and business areas for uses including waste management which should help the Borough achieve the waste management targets set out within the London Plan, which will require land for facilities.</p>

<b>Policy S3 – Economic Development</b>		<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
14. Air quality. To improve air quality.	✓	✓		✓	The policy promotes measures to reduce the need to travel and promotes the use of public transport which should help reduce the reliance on the private car and emissions from road transport. The policy should make reference to tree planting and improvements to greenspace (or cross refer to policy S7), particularly in relation to regeneration or town centres.
					<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	✓✓	✓✓		✓✓	The policy supports employment and training schemes to maximise local employment opportunities and help address skills deficits in the local population.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓✓/?	✓✓/?		✓✓/?	The policy supports both large and small businesses and enterprise through making provision for major developments and smaller businesses, markets, the retail sector, including specialist retail, the cultural sector and public houses. The policy will help in the achievement of the London Plan policy to achieve 40,000 net additional hotel bedrooms by 2026. In accordance with government guidance development within centres will be encouraged in accordance with national policy to provide 15,000m <sup>2</sup> convenience and 17,500m <sup>2</sup> comparison retail floor-space across the borough by 2020.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓	✓		✓	The policy supports the regeneration of Lambeth's town centres and supports mixed use developments and live-work units. It also seeks improvement to the public realm but does not make reference to building on previously developed land. It is recommended that the policy wording is altered to make reference to developing on previously developed land – could a target be set for 100% of new commercial development to be built on previously developed land? Some contaminated land may not be suitable for residential development but could be suitable for some commercial uses.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓✓/?	✓✓/?		✓✓/?	The policy supports employment and training schemes to maximise local employment opportunities and help address skills deficits in the local population. The policy will also help to create a diverse range of employment opportunities within the Borough by providing premises for a range of different types of business.

<b>Policy S3 – Economic Development</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b> The policy lends support to existing businesses, regeneration and employment programmes and therefore effects identified in the matrix should apply over the short, medium and long term. However, uncertainty has been identified, particularly in the long term, as market forces beyond the control of the policy will affect employment rates and the local economy. The policy performs well against the SA Framework, in particular with regard to objectives about tackling worklessness, regeneration and efficient use of land, local economy, education and skills, transport and travel, liveability and place and access and services. It also performs well in relation to air quality, waste, climate change and energy, built and historic environment, equality and diversity, provision of essential infrastructure, health and well being, and crime and safety.				

**Uncertainties**  
Uncertainty has been identified, particularly in the long term, as market forces beyond the control of the policy will affect employment rates and the local economy

**Recommendations/ Mitigation**

- The policy could be improved by adding reference to seeking high quality public green space in connection with public areas such as in town centres, especially where improvements to the public realm are mentioned and where regeneration is being sought.
- It is recommended that the policy wording is altered to make reference to developing on previously developed land – could a target be set for 100% of new commercial development to be built on previously developed land?

<b>Policy S4 – Transport</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	<b>SOCIAL</b>
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	✓	✓	✓	The policy encourages walking and cycling and a reduction in reliance on the private car which should help improve safety for pedestrians and cyclists.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓	✓	✓	The policy encourages walking and cycling and a reduction in reliance on the private car which should encourage people to take physical exercise and will support the London Plan target that by 2015 reduce by at least 10% the gap between the age standardised death rate from coronary heart disease per 100,000 population in Areas for Regeneration and the average for London as a whole.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓	✓	✓	This policy should improve access through supporting public transport improvements and improving access to public transport and walking and cycling routes. The policy no longer refers to maximising use of public transport by people with disabilities, the elderly, young children and others for whom public transport accessibility is a barrier but this is now included in the policy supporting text (paragraph 4.25). The performance of this policy against this objective is therefore weaker because it does not address accessibility of public transport for these groups of users.
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	✓✓	✓ / ?	✓ / ?	The policy seeks improvements for better connectivity, quality and capacity in public transport including a number of specific public transport infrastructure schemes. Information regarding these schemes is provided within Annex 1. The policy supports identified transport infrastructure programmes which will take place in the short term, such as the South London Route Utilisation Strategy (2008) and some underground upgrades (Victoria Line upgrade, Northern line upgrade part 1 and Vauxhall over-ground station platform improvements. Other infrastructure programmes / schemes referred to in the policy do not have funding in place and are longer term aspirations. These include the Cross River Tram, the Croydon Tramlink extension to Crystal Palace and the potential for an east London line station at Brixton. There is therefore some uncertainty recognised in the

<b>Policy S4 – Transport</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
				performance of the policy in the long term with regard to this SA Objective.
				The transport infrastructure schemes supported by this policy were also included in the Council's Transport LIP, which has already been subject to SA/SEA3; this states that:
				<i>The possible implementation of future transport projects such as the East London Line Extension, Crossrail and the Tramlink extension would also be likely to have positive environmental impacts on some of the categories outlined above [Biodiversity, Flora and Fauna; Population and Human Health; Noise; Air and Climatic factors; Soil and Water; Material assets; Cultural Heritage Archaeological and Architectural Heritage and Landscape].</i>
				<i>For instance certain proposals/schemes may have the potential for negative significant effects, in particular during scheme construction. Measures envisaged to prevent, reduce or offset any significant adverse effects (so called mitigation measures) will be proposed on a measure/scheme basis, most of which involve further outlining during project Environmental Impact Assessment.</i>
				The policy also requires financial contributions to planned programmes for increasing public transport capacity in the borough from major residential and commercial development that will have an impact on capacity of public transport.
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	✓	✓	✓	This policy should improve capacity of public transport and supports a number of infrastructure and frequency schemes which may improve accessibility of public transport for all users.
6. Housing. Ensuring everyone has the	0	0	0	This is no relationship with this SA Objective.

<sup>3</sup> Lambeth Transport (2005), SEA Environment Report.

<b>Policy S4 – Transport</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.				
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓	✓	✓	By supporting improvements to public transport services and promoting walkable / cyclable neighbourhoods, the policy supports this SA Objective.
				<b>ENVIRONMENTAL</b>
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓	✓	✓	By promoting modes of transport other than the private car, the policy will support the achievement of this SA Objective through potential improvements to the setting of historic features and enhancing the townscape/cityscape.
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓✓	✓✓	✓✓	The policy performs well against this SA objective and supports all of the appraisal criteria. The policy is in accordance with London Plan targets, for example, relating to secure cycle parking and car parking provision. The policy supports achieving the London Plan targets of increasing the capacity of public transport in London by up to 50% by 2026, a 2% reduction of weekday traffic and a 5% increase in passengers and freight transported on the blue ribbon network from 2001-2011.

<b>Policy S4 – Transport</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>	
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	✓	✓	✓
			<p>The policy supports this SA Objective through promoting car free development, walking and cycling and supporting public transport improvements which should help shift travel away from the private car. Reductions in traffic would be beneficial for wildlife in a number of ways:</p> <ul style="list-style-type: none"> <li>• Improved local air quality would create better environmental conditions for flora and fauna;</li> <li>• Reduced risk of traffic related fatality and injury;</li> <li>• Quieter environments; and</li> <li>• Less disturbance.</li> </ul>
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	✓✓	✓✓	<p>The policy supports this SA Objective through promoting walking and cycling and supporting public transport improvements which should help shift travel away from the private car and therefore reduce the consumption of fossil fuels and reduce greenhouse gas emissions associated with motorised transport. The policy could support alternative fuels in public transport if they are not already used in the Borough, although the policy authors have suggested that the Core Strategy would have limited influence over this and this may be more appropriate dealt with through the Mayor's Transport Strategy. The policy should help the achievement of London Plan targets:</p> <p>60% reduction of CO<sub>2</sub> emissions by 2050:</p> <ul style="list-style-type: none"> <li>• 15% by 2010</li> <li>• 20% by 2015</li> <li>• 25% by 2020</li> <li>• 30% by 2025. (against 1990 base)</li> </ul>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	O	O	<p>O</p> <p>This is no relationship with this SA Objective.</p>

<b>Policy S4 – Transport</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	O	O	O	This is no relationship with this SA Objective.
14. Air quality. To improve air quality.	✓✓	✓✓	✓✓	The policy supports this SA Objective through promoting walking and cycling, car clubs and supporting public transport improvements which should help shift travel away from the private car and therefore reduce the emissions associated with motorised transport.
15. Education and skills. To maximise the education and skills levels of the population.	✓	✓	✓	The policy supports this SA Objective through supporting improvements to accessibility across the Borough via improvements to public transport, and walking and cycling access which should improve access to educational facilities for all ages.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓	✓	✓	The policy supports this SA Objective through supporting improvements to accessibility across the Borough via improvements to public transport, and walking and cycling access facilitating journeys between homes and places of work.

<b>Policy S4 – Transport</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓	✓	✓	Good accessibility across the Borough, in particular by public transport, walking and cycling, which this policy supports, is an important part of successfully regenerating areas through connecting people with facilities and employment and education opportunities.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓	✓	✓	The policy supports this SA Objective through ensuring physical access to places of work through supporting improvements to public transport services and walking and cycling.

<b>Policy S4 – Transport</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b>				<p>The policy performs well against the SA Framework, and in particular in relation to objectives about transport and travel, climate change and energy, air quality, and provision of essential infrastructure. The policy also supports the achievement of SA objectives relating to access and services, health and well being, liveability and place, built and historic environment, biodiversity, education and skills, local economy, regeneration and efficient use of land and tackling homelessness. The policy supports identified transport infrastructure programmes which will take place in the short term, whilst other infrastructure programmes / schemes referred to in the policy do not have funding in place and are longer term aspirations. These include the Cross River Tram, the Croydon Tramlink extension to Crystal Palace and the potential for an east London line station at Brixton. We note that the Council's Transport LIP (2006), which supported these schemes, was subject to SEA. There is therefore some uncertainty recognised in the performance of the policy in the long term with regard to SA Objective Provision of Essential Infrastructure.</p> <p>The policy performs similarly to the former Policy S5 Transport within the Draft Core Strategy (March 2009), however it is slightly weaker in terms of Access and Services and Equality and Diversity and because it no longer explicitly seeks to maximise the use of public transport by people with disabilities, the elderly, young children and others for whom public transport accessibility is a barrier. This is now included within the supporting text for the policy (paragraph 4.25). The policy is also contains less detail, which it is intended will now be dealt with within the Development Management DPD. This includes providing for a network of electric vehicle charging points (which would be favoured by the SA and is also in accordance with London's Sustainable Design and Construction Supplementary Planning Guidance (2006)). The need for development to provide travel plans or transport assessments in accordance with the Transport for London requirements will also now be dealt with in the Development Management DPD.</p>

### **Uncertainties**

The delivery of public transport infrastructure programmes in the long term.

### **Recommendations/Mitigation**

Providing for a network of electric vehicle charging points and the need for development to provide travel plans or transport assessments in accordance with the Transport for London requirements should be included within the Development Management DPD.

<b>Policy S5 – Open Space</b>		<b>What is the predicted effect on each SA objective?</b>		<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	<b>SOCIAL</b>
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	✓	✓	✓	The policy supports walking and cycling through protecting and maintaining existing public open spaces, including the Thames Path.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	O	✓	✓	The policy encourages walking, cycling and outdoor recreational through the protection and maintenance of existing public open space and through seeking opportunities for public new open space. It also intends to protect and maintain allotment space, protect trees and promote new planting schemes and implement the local biodiversity action plan which will all contribute to the well-being of Lambeth's population. The effect is identified as neutral in the short term as it could take a couple of years for improvements to the quantity of open space to be delivered, such as through new developments.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	O	✓/?	✓/?	The policy will enable access to public open spaces and nature conservation areas and aims to improve the quantity of public open space in the Borough, which is line with the recommendation of the Open Space Strategy to double the number of good quality open spaces in the Borough. The policy does not make reference to any targets or open space standards per head of population or standards for new developments. Will these be set out within another DPD? The effect is identified as neutral in the short term as it could take a couple of years for improvements to the quantity of open space to be delivered, such as through new developments.
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	✓/?	✓/?	✓/?	The policy will enable access to public open spaces and nature conservation areas. The policy does not make reference to any targets or open space standards. Will these be set out within another DPD?
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly	?	?	?	The policy is in accordance with this SA Objective. Access for people of different abilities / Lambeth's equalities groups is not mentioned within the policy. Will an open space strategy address access issues? If so, this strategy should be referred to, especially if developers may be asked to

<b>Policy S5 – Open Space</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
those most liable to experience discrimination, poverty and social exclusion.				design open space. If access to open space is not addressed within another document, it should be addressed in this policy.
6. Housing. Ensuring everyone has the opportunity for an affordable, decent home, quiet enjoyment of that home and the protection of local amenity.	✓	✓	✓	The policy aims to protect and maintain gardens, communal spaces and land around housing estates as part of the open space network – this should contribute positively to local amenity and people's enjoyment of their homes.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	O	✓	✓	The protection and maintenance of existing open space and seeking opportunities for more public open space and nature conservation areas will contribute to the achievement of this objective. The effect is neutral in the short term as it is recognised that it may take a couple of years for new green spaces to be developed and to become established.
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓	✓	✓	The policy protects and maintains public open space, including the River Thames, foreshore and Thames path, which will help the achievement of this SA Objective.

<b>Policy S5 – Open Space</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓	✓	✓	<p>The policy will encourage walking and cycling through the protection and maintenance of public open space and through seeking opportunities for new open space.</p>
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	✓	✓✓	✓✓	<p>The policy gives support to the Lambeth Biodiversity Action Plan which in turn supports the London Plan targets. It protects existing trees, supports tree planting programmes, and aims to improve the quality and quantity of open space, including its nature conservation value. The policy also seeks opportunities to link up existing green spaces with new wildlife corridors.</p> <p>The policy does not address potential effects of development on biodiversity and it is recommended that text is added to the policy to require developers to demonstrate the effects on ecology and biodiversity are in the first instance avoided, or if effects could occur, these are fully mitigated and an overall residual effect of a net biodiversity enhancement is achieved in particular for major developments. The effect is more positive in the medium and long term as it is recognised that it may take a couple of years for new green roofs and other green spaces to be developed and to become established.</p> <p>Elsewhere, policies encourage the development of previously developed land. Where previously developed land has developed acknowledged wildlife interest – this should be taken into account and efforts made to preserve and enhance valued features.</p>

<b>Policy S5 – Open Space</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>		
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	✓	✓✓	✓✓		The policy should achieve a network of greenspace including trees, green and brown roofs, gardens, conservation areas, living walls and ground cover plants which will help mitigate the urban heat island effect, absorb carbon dioxide and provide shade which is likely to be more important during summer months in years to come as the climate changes as predicted. The effect is more positive in the medium and long term as it is recognised that it may take a couple of years for new green roofs and other green spaces to be developed and to become established.
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	✓	✓✓	✓✓		The policy should achieve a network of greenspace including trees, green and brown roofs, gardens, conservation areas, living walls and ground cover plants which will help limit surface water runoff and therefore, the risk of flooding. The effect is more positive in the medium and long term as it is recognised that it may take a couple of years for new green roofs and other green spaces to be developed and to become established.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	O	O	O		The performance against this SA Objective is neutral because it neither works towards its achievement or against it.
14. Air quality. To improve air quality.	✓	✓	✓		The policy supports tree planting programmes and therefore contributes to the achievement of this objective. However, the policy or supporting text should cross refer to specific design guidance, tree planting programmes, or other policy documents as appropriate, which set out requirements for developers to contribute to tree planting programmes.

**ECONOMIC**

<b>Policy S5 – Open Space</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
15. Education and skills. To maximise the education and skills levels of the population.	O	✓	✓	The policy contributes to this SA Objective through promoting healthy, sustainable living and through providing educational resources through encouraging access to nature conservation areas. The effect is recorded as neutral in the short term as it is recognised that new green spaces may take a couple of years to be developed and established and therefore the effect on this SA Objective to be realised.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	O	✓	✓	The policy contributes to this SA Objective through seeking more public open space and seeking improvements to existing public open space which will improve the appearance and amenity value of the borough and make it an attractive place to live and work. The effect is recorded as neutral in the short term as it is recognised that new green spaces may take a couple of years to be developed and established and therefore the effect on this SA Objective to be realised.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	O	✓	✓	The policy contributes to this SA Objective through seeking more public open space and seeking improvements to existing public open space which will improve the appearance and amenity value of the borough and make it an attractive place to live and work. The policy supports the multi-functional use of land, such as land which supports buildings and green roofs which improve biodiversity and water attenuation thus reducing the impact of the building. The effect is recorded as neutral in the short term as it is recognised that new green spaces may take a couple of years to be developed and established and therefore the effect on this SA Objective to be realised.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	O	✓	✓	The policy supports this SA Objective through making the Borough an attractive place to live and work and therefore encouraging businesses to locate there and create new jobs. The effect is recorded as neutral in the short term as it is recognised that new green spaces may take a couple of years to be developed and established and therefore the effect on this SA Objective to be realised.

<b>Policy S5 – Open Space</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b>	The appraisal team welcomes the inclusion of a green infrastructure core policy which addresses biodiversity, trees and open space in a holistic and strategic way. The policy performs well against most of the SA Objectives, in particular, biodiversity, climate change and water resources and flood risk management. Effects on biodiversity are recorded as more positive in the medium and long term as it is recognised that it may take a couple of years for new green roofs and other green spaces to be developed and to become established. Similarly, for other SA Objectives, the effect identified in the short term is neutral, such as for climate change and water resources, as the delivery of new open space and green roofs may take a few years to be realised			

<b>Uncertainties</b>
• The policy does not make reference to any targets or open space standards per head of population or standards for new developments.
• Will these be set out within another DPD?
• Access for people of different abilities / ages etc is not mentioned within the policy. Will an open space strategy address access issues?

<b>Recommendations/Mitigation</b>
• It is recommended that text is added to the policy to require developers to demonstrate the effects on ecology and biodiversity are in the first instance avoided, or if effects could occur, these are fully mitigated and an overall residual effect of a net biodiversity enhancement is achieved in major developments (including previously developed land if appropriate).
• The policy or supporting text should cross refer to specific design guidance, tree planting programmes, or other policy documents as appropriate, which set out requirements for developers to contribute to tree planting programmes.
• If another document will address access to open space for different users, such as cyclists and Lambeth's main equalities groups, it should be referred to in the policy. If access to open space is not addressed within another document, it should be addressed in this policy.

<b>Policy S6 – Flood Risk</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>	
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	<b>SOCIAL</b>	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	?	✓		✓	The policy requires development on sites adjacent to the River Thames to improve flood defences if they are in poor condition, which will contribute to safe communities. The effect in the short term is deemed to be uncertain as improvements to flood defences are dependent on new development and as such could take a few years to be put in place.	
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	?	✓		✓	There are likely to be long term health benefits in relation to protecting people and properties from flooding events.	
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	O	O	O	O	There is not considered to be a relationship with this SA Objective.	
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	✓✓	✓✓		✓✓	The policy will ensure that flood defences are put in place and maintained in a timely manner and includes mechanisms for securing delivery of infrastructure.	
5. Equality and diversity. To ensure equitable outcomes for	✓	✓		✓	Paragraph 2.73 refers to vulnerability of particular groups of the population, particularly the elderly. However, the need to make provision for these groups is not stated.	

<b>Policy S6 –Flood Risk</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
all communities, particularly those most liable to experience discrimination, poverty and social exclusion.				
6. Housing. Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	O	O	O	There is not considered to be a relationship with this SA Objective.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	O	O	O	There is not considered to be a relationship with this SA Objective.
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	?	✓	✓	<b>ENVIRONMENTAL</b> Reducing flood risk will help protect historical assets, such as on the banks of the River Thames, where some flood defences may be in poor condition and in need of improvement. The effect is unclear in the short term as some assets may currently be at risk from flooding and there may be a time lag before improved defences are in place.

<b>Policy S6 –Flood Risk</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	O	O	O	There is not considered to be a relationship with this SA Objective.
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	?	✓	✓	The policy requires the management of risk, which may include the use of sustainable urban drainage systems (although these are not explicitly mentioned). The link between water attenuation measures and biodiversity benefit is discussed within paragraph 2.74 of the supporting text. The effect in the short term is uncertain as it may take a few years before SUDS / water attenuation measures are delivered as a part of new development.
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	?	✓	✓	The policy deals with reducing flood risk which is likely to be exacerbated by climate change. The policy does not directly contribute to achieving CO <sub>2</sub> targets. The effect in the short term is uncertain as it may take a few years before SUDS / water attenuation measures are delivered as a part of new development.

<b>Policy S6 –Flood Risk</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>			
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>				
12. Water resources and flood risk management.	To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	?	✓	✓	The policy will contribute to the achievement of this SA Objective and meets most of the appraisal criteria. In line with the SFRA the policy sets out how flood risk will be managed in accordance with PPS25 and how the sequential test will be applied.  The policy no longer deals with water resources and efficiency (now mentioned within policy S7 Sustainable Design and Construction), however, the Core Strategy does not deal with water quality and protecting the quality of water resources at all. The Development Management DPD should include policies that will protect the water environment and avoid pollution within policy. The policy does not make reference to standards, such as the London Plan standard to achieve 50% attenuation of the undeveloped site's surface water run off at peak times. It is assumed that the Sustainable Design and Construction SPD will include requirements to protect water resources during construction and use water efficiently in new developments. There could be some uncertainty regarding the delivery of SUDs in the short term as these could be delivered through new development, which could take a couple of years to be developed.			
13. Waste.	Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	O	O	O	The policy deals only with flood risk and there is no relationship with the policy and waste management.			
14. Air quality.	To improve air quality.	O	O	O	There is not considered to be a relationship with this SA Objective.	<b>ECONOMIC</b>		
15. Education and skills.	To maximise the education and skills levels of the population.	O	O	O	There is not considered to be a relationship with this SA Objective.			

<b>Policy S6 –Flood Risk</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	O	O	O	There is not considered to be a significant relationship with this SA Objective, although improved flood defences would be beneficial for business in terms of reducing risk to assets and reducing disruption.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓	✓	✓	Although it is not made explicit the policy supports the use of SUDs which contribute to the multi-functional use of land.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	O	O	O	There is not considered to be a relationship with this SA Objective.

<b>Policy S6 –Flood Risk</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b> Policy S6 contributes to the achievement of a number of the SA Objectives with regard to water resources and flood risk management. In line with the SFRa the policy sets out how flood risk will be managed in accordance with PPS25 and how the sequential test will be applied.				
The policy has been made more robust through consultation with the Environment Agency. For example, it now seeks to steer development towards areas of lowest flood risk which is an improvement on the Draft Core Strategy policy, which was not as explicit with regards to sequential testing.				
<b>Uncertainties</b> There is some uncertainty recorded in the matrix in the short term as improvements of flood defences (particularly on the banks of the River Thames) and the delivery of new SUDS / water attenuation measures are dependent on new development and it is therefore not certain that these will be delivered in the short term.				
<b>Recommendations /Mitigation</b> It is recommended that the Development Management DPD includes the avoidance of pollution and the protection of water quality within policy.				

Policy S7 – Sustainable Design and Construction		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement	
SA Objectives		Short term	Med term	Long term	SOCIAL	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	?	✓/?		✓/?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements in relation to designing our crime in developments. See summary for recommendations.	
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	?	✓/?		✓/?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements in relation to improving health through design and construction. See summary for recommendations.	
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	?	✓/?		✓/?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.	
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or	?	✓/?		✓/?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. The Development Management DPD should require developers to demonstrate that provision has been made for the necessary infrastructure needed for their development to take place and that it will be delivered in pace with development.	

<b>Policy S7 – Sustainable Design and Construction SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
likely future demands.				
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	?	✓ / ?	✓ / ?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements in relation to improving achieving equitable outcomes for all communities. See summary for recommendations.
6. Housing. Ensuring everyone has the opportunity for an affordable, decent home, quiet enjoyment of that home and the protection of local amenity.	O	O	O	Policy S2 – Housing deals with housing provision, including affordable housing provision. This policy does not relate to the provision of housing but provides support to Policy S2 as housing development will need to be subject to sustainable design and construction techniques.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	?	✓ / ?	✓ / ?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.

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<b>Policy S7 – Sustainable Design and Construction SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	?	✓/?	✓/?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	?	✓/?	✓/?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	?	✓/?	✓/?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.

<b>Policy S7 – Sustainable Design and Construction SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	✓/?	✓/?	✓/?	<p>The policy promotes zero carbon and low-carbon development. It also requires all major development to achieve a reduction in carbon emissions in line with London Plan targets. It also requires safeguarding of existing heat, cooling and power networks although it needs to be ensured that these systems are low carbon or carbon neutral. The policy promotes improvements in the energy efficiency of existing buildings through refurbishment and maintenance and through a variety of promotional measures where planning controls do not apply. The policy requires all developments to be designed to high standards of energy efficiency, although the policy itself sets no specific targets.</p> <p>This policy contributes to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown. See summary for recommendations. There is uncertainty over what constitutes a major development as this is not defined within the policy or supporting text.</p> <p>What constitutes a major development needs to be identified within the Core Strategy and/or within the Development Management DPD. The Development Management DPD needs to set out requirements for developments that are not major developments. See summary for recommendations.</p> <p>This policy encourages the efficient use of water, including rainwater harvesting and recycling and the use of SuDS and permeable surfaces. There is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.</p> <p>The Environment Agency made it clear in their consultation response that there are potential hazard associated with the use of penetrative systems to provide heating/cooling for new developments. There is potential for a negative impact on water quality through the chemicals that are used within the systems as well as the heat that may be introduced into the ground which can be considered a pollutant. According to EA Policy Groundwater protection: Policy &amp; Practice (GP3, 2008), the EA recommend developers undertake appropriate prior investigations for these systems which should include appropriate environmental risk assessment and method statement. This could be highlighted in the policy or the Development Management DPD.</p>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	?	✓/?	✓/?	

<b>Policy S7 – Sustainable Design and Construction</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	?	✓/?	✓/?	✓/?	<p>The policy encourages the re-use of buildings and building materials but does not mention sustainable waste management with regards to construction or operation of developments.</p> <p>There is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.</p>
14. Air quality. To improve air quality.	?	✓/?	✓/?	✓/?	<p>This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements and does not specifically mention the need to improve the air quality within the borough, the whole of which is within an AQMA. The Development Management DPD will address issues in relation to the detailed application of Core Strategy policy including Lambeth-specific targets on environmental performance including air quality. Air quality is no longer mentioned in any of the core policies.</p>
15. Education and skills. To maximise the education and skills levels of the population.	?	✓/?	✓/?	✓/?	<b>ECONOMIC</b> There is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	?	✓/?	✓/?	✓/?	<p>There is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.</p>

<b>Policy S7 – Sustainable Design and Construction SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	?	✓/?	✓/?	The policy promotes the use of new networks of decentralised energy through neighbourhood regeneration programmes. This should ensure that There is uncertainty because the requirements of the Development Management DPD and SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	?	✓/?	✓/?	This policy should contribute to this SA Objective although there is uncertainty because the requirements of the Sustainable Design and Construction SPD are as yet unknown and the policy itself does not set any targets or requirements. See summary for recommendations.

<b>Policy S7 – Sustainable Design and Construction</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b>				The policy amalgamates previous Draft Core Strategy policies S11 Sustainable Design and Construction and S9 Sustainable Energy Use, with some other additions / alterations.
				<p>The policy should have a positive performance with regard to most of the SA Objectives, although there is uncertainty because the policy itself does not set out any targets or specific requirements (apart from making reference to London plan carbon reduction targets), but instead these will be detailed within a Development Management DPD and/or relevant SPD. Uncertainty particularly applies in the short term because the Development Management DPD and SPD will be adopted after the Core Strategy will be adopted after the Core Strategy. <i>The Council has responded to the previous SA recommendations made regarding sustainable development targets (with regard to Draft Core Strategy Policy S11) and has stated that they are too detailed for the Core Strategy and will be addressed through the preparation of the Development Management DPD and/or relevant SPD. Some of the recommendations made previously are therefore repeated below with reference to the Development Management DPD and the relevant SPD to be developed.</i></p> <p>The policy does not mentioned sustainable waste management and it is felt that this is an omission from the last paragraph of the policy, even though sustainable waste management is dealt with strategically in Policy S8 Sustainable Waste Management.</p>

#### **Uncertainties**

As mentioned above, although the policy is potentially in accordance with most of the policies, there is uncertainty because the policy itself does not set out any targets or specific requirements. These will be detailed within the Development Management DPD with guidance provided within a Supplementary Planning Document (SPD). Uncertainty particularly applies in the short term because the Development Management DPD and SPD will be adopted after the Core Strategy.

#### **Recommendations/ Mitigation**

##### Recommendations for the Submission Core Strategy

The last paragraph of the policy should mention sustainable waste management, even though sustainable waste management is dealt with strategically in Policy S8 Sustainable Waste Management.

What constitutes a major development needs to be identified within the Core Strategy and/or within the Development Management DPD.

##### Recommendations for the Development Management DPD and supporting SPD

It needs to be ensured that safeguarded existing heat, cooling and power networks are low carbon or carbon neutral and have been subject to an appropriate environmental risk assessment and method statement. Development Management may provide the best mechanism for ensuring this.

If it is the case that sustainable development targets will only be set within the Development Management DPD, the DPD should either set

<b>Policy S7 – Sustainable Design and Construction</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>	
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>
out the timeframes for achievement of the mandatory Code for Sustainable Homes or BREEAM Levels for private developers:			
<p>For example:</p> <ul style="list-style-type: none"> <li>2010 – minimum Code level 3</li> <li>2013 – minimum Code level 4</li> <li>2016 – minimum Code level 6</li> </ul>			

Or alternatively, should state that the Code level targets to be achieved are those as set by the Government (in the event that these target dates should change).

The policy should state an aspiration for large scale housing developments within the Borough to achieve Code level 4 prior to 2013.

Sustainability Assessments should be required for all developments. The thresholds at which a sustainability assessment is required should be stated and indication of the level of detail required for different scales of development should be provided. For example, the minimum topics that should be covered could be listed, or it should be a requirement of the policy that the sustainability assessment should be in line with the Mayor's Sustainable Design and Construction SPD and that this should be followed for major developments. Specific guidance for smaller developments will need to be provided as a minimum. This could consist of a sustainability checklist for householder and minor developments. This checklist should be aligned with the SA objectives within this report. In addition, the Development Management DPD and the SPD should be in accordance with all of the SA Objectives.

The Development Management DPD and SPD referred to in the policy should require developers to demonstrate that provision has been made for the necessary infrastructure needed for their development to take place and that it will be delivered in pace with development.

Policy S8 – Sustainable Waste Management		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement	
SA Objectives		Short term	Med term	Long term	SOCIAL	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	O	O	O	O	There is not considered to be a relationship with this SA Objective.	
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	O	O	O	O	Managing waste sustainably will have positive health effects.	
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	O	O	O	O	There is not considered to be a relationship with this SA Objective.	
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	✓✓	✓✓	✓✓	✓✓	Waste is not listed as essential infrastructure within the appraisal criteria but this policy will ensure the delivery of waste infrastructure as set out within the Western Riverside Waste Authority's statutory Waste Strategy and the Lambeth Waste Strategy.	
5. Equality and diversity. To ensure	O	O	O	O	There is not considered to be a relationship with this SA Objective.	

<b>Policy S8 – Sustainable Waste Management</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.					
6. Housing. Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	0	0	0		There is not considered to be a relationship with this SA Objective.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	0	0	0		There is not considered to be a relationship with this SA Objective.
					<b>ENVIRONMENTAL</b>
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	?	?	?		The policy provides a 'hook' for the allocation of sites for new waste management facilities, which will be allocated through the Allocations DPD. There could therefore be a potential for negative effects on the built and historic environment, although as the type and location of any new waste facilities is unknown, the potential for adverse effects is unknown. Any proposals for new waste facilities will need to be subject to development control policies, which will be set out within the Development Control DPD.

<b>Policy S8 – Sustainable Waste Management SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	?	?	?	The policy supports the Western Riverside Waste Authority's statutory Waste Strategy and the Lambeth Waste Strategy and the allocation of additional sites for waste management. It is unclear at this stage whether the policy could result in an increase in journeys or road traffic. The encouragement of on-site waste management facilities in major new developments should reduce travel required for waste management.
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	?	?	?	The policy supports the allocation of additional sites for waste management and as such there could be a potential for adverse effects on biodiversity as a result of new development, however, the location of development is not yet known and therefore the performance against this SA objective is uncertain.
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	?	?	?	The policy needs to more clearly support the waste hierarchy and should particularly support the efficient use of resources, the reuse of materials / resources and recovery of energy from materials in order to reduce the Borough's carbon footprint.

<b>Policy S8 – Sustainable Waste Management SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	O	O	O	There is not considered to be a relationship with this SA Objective. Water resources and flooding are dealt with in policy S8 – Water Resources and Flood Risk Management.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	✓	✓	✓	The policy sets out measures to ensure adequate land and facilities for waste management over the LDF period, supports the waste hierarchy and in particular the efficient use of resources, the reuse of materials and resources, and the recovery of energy from materials. However it does not set out how waste will be managed in a sustainable manner, other than to "require appropriate waste and recycling storage and collection facilities in all new developments" and requiring on site waste management facilities in major new developments. Cross reference is required to another policy or document which sets out what is required in new developments with regard to appropriate waste and recycling storage – will this be in the Lambeth Waste Strategy or the Sustainable Design and Construction SPD? It is recommended that the policy itself is amended, such as through the addition of another sub-section / bullet point so that it makes reference to the waste hierarchy, encouraging the reuse of materials, waste minimisation, particularly during construction and during the life and use of buildings. The policy should make reference to achieving the waste management targets of the London Plan, such as achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and 80% recycling of that waste as aggregates in London by 2020)
14. Air quality. To improve air quality.	?	?	?	The performance against this SA objective is uncertain as the impact of this policy on transport is unknown (although the policy does set out some requirements relating to the location of new waste management sites which includes rail and water access) and it is also unclear whether the types of waste management facility to be developed in the Borough could have any positive or negative effect on local air quality.

<b>Policy S8 – Sustainable Waste Management SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
15. Education and skills. To maximise the education and skills levels of the population.	O	O	O	There is not considered to be a relationship with this SA Objective.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	O	O	O	The policy enables the development of new waste facilities which could create new jobs within the Borough, although the numbers of new jobs are likely to be very small and therefore the effect is deemed to be neutral.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	O	O	O	It is not considered that the policy contributes or works against this SA Objective.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	O	O	O	There is not considered to be a relationship with this SA Objective.

<b>Policy S8 – Sustainable Waste Management</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b>				
The policy sets out measures to ensure adequate land and facilities for waste management over the LDF period, however it does not set out in detail how waste will be managed in a sustainable manner. Cross reference is required to another policy or document which sets out what adequate facilities might be – will this be in the Lambeth Waste Strategy or the Sustainable Design and Construction SPD?				
<b>Uncertainties</b>				
<ul style="list-style-type: none"> <li>The policy does not define what 'appropriate waste and recycling storage and collection facilities in all new development' might be or where these requirements will be set out.</li> <li>The location of new waste management sites will be allocated through an allocation DPD and are as yet unknown.</li> <li>The performance against the air quality objective (no. 14) is uncertain as the impact of this policy on transport is unknown (although the policy does set out some requirements relating to the location of new waste management sites which includes rail and water access) and it is also unclear whether the types of waste management facility to be developed in the Borough could have any positive or negative effect on local air quality.</li> </ul>				

#### **Recommendations/Mitigation**

- Cross reference is required to another policy or document which sets out what is required in new developments with regard to appropriate waste and recycling storage – will this be in the Lambeth Waste Strategy or the Sustainable Design and Construction SPD?
- The policy should make reference to achieving the waste management targets of the London Plan, such as achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and 80% recycling of that waste as aggregates in London by 2020)

<b>Policy S9 – Quality of the Built Environment</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	<b>SOCIAL</b>
1. Crime and safety. Ensuring safe communities with	?	✓✓	✓✓	The policy includes a sub-section (f) regarding the creation of safe and secure environments that reduce the scope for crime, fear of crime, anti-social behaviour and fire, having regard to Secured by Design standards and addressing resilience to

<b>Policy S9 – Quality of the Built Environment</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
reduced crime and disorder.				terrorism in major development proposals. There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.
				There is nothing in the policy relating to climate change adaptation. Although flooding is dealt with under policy S8, there are other impacts of climate change which will need to be addressed in new and existing built development, e.g. summer overheating. This should be addressed within the Development Management DPD.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	?	✓✓	✓✓	The policy encourages healthy lifestyles through a commitment to improve the quality of the public realm to ensure that it encourages physical activity.
				There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓/?	✓	✓	The policy aims to improve pedestrian routes within and through neighbourhoods and ensure that the public realm is child-friendly and accessible for people with disabilities.
				There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future	0	0	0	Essential infrastructure provision is not within the remit of this policy.

<b>Policy S9 – Quality of the Built Environment</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	✓/?	✓	✓	<p>The policy aims to improve and maintain the quality of the built environment, particular in the River Thames policy area. The policy encourages innovation in design, particularly where this contributes to local distinctiveness and enhances the existing built environment and heritage. This could contribute to this SA Objective in a minor way through strengthening local community distinctiveness and improving environmental conditions. There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.</p>
6. Housing. Ensuring everyone has the opportunity for an affordable, decent home, quiet enjoyment of that home and the protection of local amenity.	O	O	O	<p>Housing provision is not within the remit of this policy.</p>
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	?	✓✓	✓✓	<p>This policy will contribute directly to this SA Objective by seeking high quality design, improving pedestrian routes and creating safe environments.</p> <p>The policy no longer encourages public art.</p> <p>There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.</p>

## **ENVIRONMENTAL**

<b>Policy S9 – Quality of the Built Environment</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓/?	✓✓	✓✓	<p>This policy will contribute directly to this SA Objective by seeking high quality design, encouraging tall buildings in appropriate places where they are appropriate to the surrounding landscape. The selection of areas suitable for tall buildings is detailed within a separate topic paper accompanying the Core Strategy.</p> <p>Innovation in design will also be supported and encouraged, particularly where this contributes to local distinctiveness. The policy also seeks to protect strategic views, including those that affect the outstanding universal value and setting of the Westminster World Heritage Site.</p> <p>There is some uncertainty in the short term as the benefits of this policy are dependent on new development and may take a few years to be realised.</p>
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓/?	✓✓	✓✓	<p>The policy will improve pedestrian routes within and through neighbourhoods and therefore performs positively. It also seeks to improve pedestrian and cycle routes within and through neighbourhoods, linked to green spaces and public transport nodes and interchanges.</p> <p>There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.</p>
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	✓/?	✓	✓	<p>The policy makes reference to improving biodiversity, linking the public realm with green spaces and incorporating ecological features. There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.</p>

<b>Policy S9 – Quality of the Built Environment</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	O	O	O	This policy includes no reference of sustainable design although this is dealt with in policy S7 Sustainable Design and Construction and it is assumed it will be dealt with in more detail the Development Management DPD and supporting SPD.
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	O	O	O	As above, this policy includes no reference of sustainable design although this is dealt with in policy S7 –Sustainable Design and Construction and it is assumed it will be dealt with in more detail the Development Management DPD and supporting SPD.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	O	O	O	As above, this policy includes no reference of sustainable design although this is dealt with in policy S7 –Sustainable Design and Construction and it is assumed it will be dealt with in more detail the Development Management DPD and supporting SPD.

<b>Policy S9 – Quality of the Built Environment</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
14. Air quality, To improve air quality.	O	O	O	The policy no longer refers to seeking improvements to air quality within Air Quality Management Areas. The Development Management DPD will address issues in relation to the detailed application of Core Strategy policy including Lambeth-specific targets on environmental performance including air quality. Air quality is no longer mentioned in any of the core policies.
				<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	O	O	O	Education and skills is not within the remit of this policy.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	?	✓✓	✓✓	Good standards of design would help contribute to the local economy and competitiveness of the Borough. Enabling tall buildings to be built in appropriate places will also help contribute by providing business premises which should also contribute to the local economy, particularly within Vauxhall and Waterloo London Plan Opportunity Areas, Brixton, Streatham and Tulse Hill. There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	?	✓	✓	The policy encourages innovation particularly where it creates new high quality areas of public realm, which supports the achievement of this SA objective.  There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.

<b>Policy S9 – Quality of the Built Environment</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	?	✓	✓	The ability of this policy to fully contribute to the achievement of this objective is limited, however by supporting the local economy (see SA Objective 16 Local Economy) it is considered that the policy contributes to this SA Objective. There is some uncertainty in the short term as these benefits are dependent on new development and may take a few years to be realised.

<b>Policy S9 – Quality of the Built Environment</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b> Several of the SA recommendations previously made (in relation to Draft Core Strategy policy S12 Quality of the Built Environment) have been taken on board within the Submission Core Strategy policy S9 Quality of the Built Environment. These include:				
<ul style="list-style-type: none"> <li>• Inclusion of references to ensuring that the public realm is child-friendly and encourages physical activity.</li> <li>• Inclusion of text within sub-section (e) "...and includes safe and attractive pedestrian and cycle routes within and through neighbourhoods, linked to green spaces and public transport nodes and interchanges."</li> <li>• Sub-section (e) now includes a reference to incorporating ecological features into the public realm.</li> <li>• S9 (a) now states that "Innovation in design will be supported and encouraged, particularly where this...creates new high quality areas of public realm."</li> </ul>				
These amendments have improved the performance of the policy.				
				<p>The policy generally performs well against the social and economic SA Objectives and performs very positively with regard to crime and safety, health and well being, liveability and place, built and historic environment, transport and travel and local economy. The policy also contributes positively to access and services, equality and diversity, biodiversity, regeneration and efficient use of land and tackling worklessness. The policy is deemed to have a neutral performance with regard to climate change and energy, water resources and flood risk management, air quality and waste because although these issues are generally covered by other core policies and forthcoming DPDs, there is an opportunity to link these issues with good design in this policy.</p>
<b>Uncertainties</b>				<p>Some uncertainty has been identified in the short term as some of the benefits of the policy, such as improved safety, are dependent on new development and may take a few years to be realised.</p>
<b>Recommendations/Mitigation</b>				<p>The Development Management DPD should refer to the need to design/ retrofit new/existing buildings to cope with future climates, particularly in relation to impacts other than flooding.</p> <p>The Development Management DPD should encourage public art.</p>

Policy S10 – Planning Obligations		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement	
SA Objectives		Short term	Med term	Long term	SOCIAL	
1. Crime and safety.	Ensuring safe communities with reduced crime and disorder.	?	✓/?	✓/?	The Planning Obligations SPD (for which this policy forms the basis) could be used to deliver road safety improvements and public realm improvements which could help improve a sense of security. Planning obligations could also be used to support a community support officer or community co-ordinator role which could help address crime and fear of crime issues. There is some uncertainty because it will be for the Planning Obligations SPD to set out what contributions will be taken for and the effect is dependent on planning applications coming forward, and therefore benefits may take a few years to be realised. See summary for recommendations.	
2. Health and well being.	Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	?	✓	✓	The Planning Obligations SPD (for which this policy forms the basis) is likely to be used to deliver health services to meet the needs of new developments. The effect in the short term is uncertain because the effect is dependent on developments coming forward. See summary for recommendations.	
3. Access and services.	Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	?	✓✓	✓✓	The policy will enable planning obligations to be put towards provision of services and facilities. The effect in the short term is uncertain because the effect is dependent on developments coming forward. See summary for recommendations.	
4. Provision of essential infrastructure.	To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	?	✓✓	✓✓	The policy will enable planning obligations to be paid and put towards provision of services and facilities. Even so, the effect in the short term is uncertain because the effect is dependent on developments coming forward. See summary for recommendations.	

<b>Policy S10 – Planning Obligations</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	?	✓/?	✓/?	There is potential for the Planning Obligations SPD (for which this policy forms the basis) to be used to improve equality and diversity in communities. However, the performance is also deemed to be uncertain as it will be for the Planning Obligations SPD and the area SPDs to set out what is required, and particularly in the short term, the benefits are dependent on development coming forward, and therefore it may take a couple of years for benefits to be realised. The SPDs should enable planning obligations to be used to improve environmental and social conditions in deprived areas and communities.
6. Housing. Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	?	✓/?	✓/?	This policy could enable planning obligations to be used to secure affordable housing units offsite. The performance is also deemed to be uncertain as it will be for the Planning Obligations SPD to set out what is required and whether this will include taking contributions for the provision of affordable housing. The effect is uncertain particularly in the short term, because the benefits are dependent on development coming forward, and therefore it may take a couple of years for benefits to be realised.
7. Liveability and place.	?	✓/?	✓/?	This policy could enable planning obligations to be secured in order to enhance the quality and quantity of open space and the public realm and promote community engagement. The performance is also deemed to be uncertain as it will be for the Planning Obligations SPD to set out what is required and therefore what might be delivered. The effect is uncertain particularly in the short term, because the benefits are dependent on development coming forward, and therefore it may take a couple of years for benefits to be realised. The Planning Obligations SPD and area SPDs should include taking contributions for enhancing the quality and quantity of open space and the public realm and promoting community engagement, such as contributing towards a community co-ordinator in regeneration areas.

## **ENVIRONMENTAL**

<b>Policy S10 – Planning Obligations</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	?	✓/?	✓/?	<p>Planning Obligations could be used to secure a programme of public art and other cultural facilities (e.g. museums or exhibitions) and activities. This would contribute towards the achievement of this SA Objective although there are other matters outside of the remit of this policy, such as design, that would also contribute to this objective. There is some uncertainty because it will be for the Planning Obligations SPD to set out what contributions will be taken for. The effect is uncertain particularly in the short term, because the benefits are dependent on development coming forward, and therefore it may take a couple of years for benefits to be realised. The Planning Obligations SPD should include taking contributions for enhancing the quality and character of the built and historic environment and the provision of cultural facilities.</p>
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	?	✓✓	✓✓	<p>Contributions for public transport services and other transport infrastructure such as cycle paths and parking are likely to be secured through the planning obligations SPD. The effect is uncertain in the short term as benefits are dependent on development coming forward and therefore benefits could take a couple of years to be realised.</p>
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	?	✓/?	✓/?	<p>Planning obligations could be used to secure biodiversity improvements required in order for development to go ahead. There is some uncertainty because it will be for the Planning Obligations SPD to set out what contributions will be taken for and in the short term, benefits will be dependent on development coming forward. The Planning Obligations SPD should include taking contributions towards maintaining and enhancing the biodiversity of the Borough to contribute to the BAP and green infrastructure.</p>

<b>Policy S10 – Planning Obligations</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	?	✓/?	✓/?	<p>It is not considered that this policy contributes significantly to this SA objective, because most factors that will influence the achievement of the SA objective will need to be integrated within the design of any development. However, there could be potential for the Planning Obligations SPD to be used to secure retrofitting of existing buildings or energy infrastructure needed to support new development. There is some uncertainty because it will be for the Planning Obligations SPD to set out what contributions will be taken for. and in the short term, benefits will be dependent on development coming forward. Consideration should be given to the need for the Planning Obligations SPD and area SPDs to contribute to this objective such as through retrofitting of existing buildings or energy infrastructure needed to support new development.</p>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	?	✓/?	✓/?	<p>It is not considered that this policy contributes significantly to this SA objective, because most factors that will influence the achievement of the SA objective will need to be integrated within the design of any development. However, there could be potential for the Planning Obligations SPD and area SPDs to take contributions towards off-site SUDs for example and this should be considered when the SPD is prepared. There is some uncertainty because it will be for the Planning Obligations SPD to set out what contributions will be taken for and in the short term, benefits will be dependent on development coming forward.</p>
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	?	✓/?	✓/?	<p>It is not considered that this policy contributes significantly to this SA objective, because most factors that will influence the achievement of the SA objective will need to be integrated within the design of any development. However, there could be potential for the Planning Obligations SPD to take contributions towards sustainable waste management facilities, such as a recycling centre and this should be considered when the SPD is prepared. There is some uncertainty because it will be for the Planning Obligations SPD to set out what contributions will be taken for and in the short term, benefits will be dependent on development coming forward.</p>
14. Air quality. To improve air quality.	?	✓	✓	<p>The policy will contribute to this objective because it is likely that the Planning Obligations SPD will include transport infrastructure and public transport services, which will contribute to improving air quality. In the short term, benefits will be dependent on development coming forward. The Planning Obligations SPD could also support the planting of trees and this should be considered in its preparation.</p>

<b>Policy S10 – Planning Obligations</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
15. Education and skills. To maximise the education and skills levels of the population.	?	✓	✓	The policy could enable planning obligations to be put towards provision of education services and facilities which would contribute towards the achievement of this SA objective. There is some uncertainty because it will be for the Planning Obligations SPD to set out what contributions will be taken for. In the short term, benefits will be dependent on development coming forward. The policy could set out the types of services and facilities that contributions will be required for.  It is not considered that this policy contributes to this objective.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	O	O	O	
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	O	O	O	It is not considered that this policy contributes to this objective.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	?	?	?	There could be potential for the Planning Obligations SPD to include support for tackling worklessness, such as contributions for childcare provision. The performance is deemed to be uncertain as this depends on the content of the SPD.

Policy S10 – Planning Obligations		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement	
SA Objectives		Short term	Med term	Long term		
<b>Conclusions</b>	The policy provides a 'hook' on which to hang a Planning Obligations SPD. The policy performs well against objectives which relate to provision of services and facilities, health and well-being, transport and other essential infrastructure because there is some confidence that these will be included within the Planning Obligations SPD. There is potential for positive effects against a number of other objectives such as in relation to biodiversity, crime and safety, built and historic environment, climate change and energy, liveability and place, water resources and flood risk management, waste, education and skills and tackling worklessness. However, there is some uncertainty regarding this effects as these elements may or may not be included within the Planning Obligations SPD or the area-based SPDs.					
<b>Uncertainties</b>	The policy does not set out the types of projects, facilities, services etc that contributions may be put towards and therefore the appraisal records some uncertainty as there is potential for the policy to contribute to some of the SA Objectives but it depends on what is set out within the SPD. There is some uncertainty in the short term as benefits of the policy will be dependent on development coming forward, and therefore it could take a few years for benefits to be realised.					
<b>Recommendations/Mitigation</b>	No mitigation has been identified in order to offset any potential negative effects of this policy. A number of recommendations have been identified to improve the policy and to be taken into consideration in the preparation of the Planning Obligations SPD and in site specific area based SPDs. The recommendations are as follows:					
	<ul style="list-style-type: none"> <li>• If appropriate, the policy could set out the types of services and facilities that contributions will be used for. This will help demonstrate how the developer contributions will be used to address some of the identified sustainability issues within the Borough.</li> <li>• The policy makes reference to controlling phasing but could make it clearer that facilities and infrastructure would need to be put in place at an appropriate time to meet the needs of new development in order to ensure that there is no time lag between need and delivery of facilities.</li> <li>• The SPDs should enable planning obligations to be used to improve environmental conditions in deprived areas and communities.</li> <li>• The SPDs should include taking contributions for enhancing the quality and quantity of open space and the public realm and promoting community engagement, such as contributing towards a community co-ordinator in regeneration areas.</li> <li>• The SPDs should include taking contributions for enhancing the quality and character of the built and historic environment and the provision of cultural facilities.</li> <li>• The SPDs should include taking contributions towards maintaining and enhancing the biodiversity of the Borough to contribute to the BAP and green infrastructure.</li> <li>• Consideration should be given to the need for the SPDs to contribute to the retrofitting of existing buildings or energy infrastructure needed to support new development.</li> <li>• There could be potential for the SPDs to take contributions towards off-site SUDs for example and this should be considered when the SPD is prepared.</li> <li>• There could be potential for the Planning Obligations SPD to take contributions towards sustainable waste management facilities, such as a recycling centre and this should be considered when the SPD is prepared.</li> <li>• The Planning Obligations SPD could also support the planting of trees and this should be considered in its preparation.</li> </ul>					

Policy PN1 – Waterloo		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement	
SA Objectives		Short term	Med term	Long term	SOCIAL	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	?	✓		✓?	No specific reference to crime, but the policy should contribute positively to crime and fear of crime and safety via: <ul style="list-style-type: none"><li>• High and improved standards of public realm and the pedestrian environment;</li><li>• Provision of social and green infrastructure;</li><li>• Major public transport provision;</li><li>• Local job creation.</li></ul>	Nothing about climate change <i>adaptation</i> : this part of the Borough is within flood zone 3a.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓	✓		✓	The policy should result in positive health and well being benefits via: <ul style="list-style-type: none"><li>• Provision of health facilities and services;</li><li>• Support for St. Thomas's Hospital development;</li><li>• Promotion of public transport;</li><li>• High public realm and pedestrian environment standards;</li><li>• Provision of jobs, including local jobs;</li><li>• Provision of social and green infrastructure for residents.</li></ul>	The policy should help to reduce health inequalities by environmental improvements, support for sustainable transport, provision of affordable housing, local jobs, childcare facilities and training.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓✓	✓✓		✓✓	Should score positively in terms of access to services through provision of social infrastructure such as 'local health, education, childcare, leisure, library and other public services'. In addition it supports: <ul style="list-style-type: none"><li>• Provision of jobs, including local jobs;</li><li>• Provision of cultural facilities;</li><li>• Provision of improved green infrastructure/ public realm/ pedestrian environment.</li></ul>	Should score positively in terms of creating an accessible neighbourhood through high standards of public realm and world city design quality.

<b>Policy PN1 – Waterloo</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	✓?	✓	✓	<p>Commitment to social and green infrastructure for residents, including health education, childcare, leisure, library and other public services. Good public transport infrastructure exists at Waterloo and the policy seeks improvements to public transport capacity and interchange quality.</p> <p><b>Physical infrastructure will need to include water and sewerage capacity.</b></p> <p>Waterloo lies to the north of Lambeth's most deprived areas (London Plan 'Areas for Regeneration').</p> <p>The policy will promote equitable outcomes and social cohesion through:</p> <ul style="list-style-type: none"> <li>• provision of affordable housing and 'local jobs' approach;</li> <li>• provision of local training;</li> <li>• improving public transport capacity;</li> <li>• general environmental improvements including seeking opportunities for additional public open space;</li> <li>• provision of range of social infrastructure, including health education, childcare, leisure, library and other public services;</li> <li>• promotion of mixed residential area.</li> </ul>
5. Equality and diversity.	✓?	✓	✓	<p>To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p> <p><b>There is no specific attention to the needs of identified equality target groups.</b></p>
6. Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	✓?	✓	✓	<p>The policy seeks to meet London Plan housing targets, including affordable housing. It also seeks a mixed residential approach and the highest standards of sustainable design and construction.</p> <p><b>Given the nature of the area as an important cultural and tourist destination, there could be issues about residential quality suffering due to disturbance and noise issues. The policy could promote a partnership approach to minimise any impacts on residents.</b></p>
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of	✓	✓	✓	<p>The policy scores well on good urban design and improvements to the public realm and open space. However, as noted above, measures need to be put in place to ensure that local residential amenity is not diminished by the tourism and cultural operations.</p>

<b>Policy PN1 – Waterloo</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
place.				<b>ENVIRONMENTAL</b>
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓	✓	✓	<p>The policy seeks to protect and enhance the built and historic environment by:</p> <ul style="list-style-type: none"> <li>• improving open space and the public realm;</li> <li>• reinforcing the identity of the four character areas;</li> <li>• respecting strategic views;</li> <li>• respecting local contextual considerations including heritage assets;</li> <li>• applying World City design quality.</li> </ul> <p>Whilst the policy identified an area with potential for a cluster of tall buildings, it ensures that development should be appropriate to its settings and have due regard to strategic views.</p> <p>The policy scores strongly on enhancing cultural facilities.</p>
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓✓	✓✓	✓✓	<p>There is no mention of archeological issues.</p> <p>The policy scores highly on the promotion of sustainable transport and travel. It is an area well served by public transport, and seeks capacity improvement and improvements to interchange quality.</p> <p>Other aspects which contribute positively are:</p> <ul style="list-style-type: none"> <li>• encouraging local jobs for local residents;</li> <li>• provision of staff and student accommodation on site at St.Thomas' and Kings College;</li> <li>• improvements to the pedestrian environment and the public realm.</li> </ul>
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	✓?	✓?	✓?	<p>The policy does not specifically refer to biodiversity – not surprisingly as this is a highly urbanised area with few valued accessible wildlife sites and habitats (with the exception of the River Thames).</p> <p>However, it should result in an improved public space/ public realm offer, and seeks opportunities for the creation of new areas of public open space. Therefore, there could be a slight improvement in relation to biodiversity.</p>

<b>Policy PN1 – Waterloo</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	✓	✓	✓?	<p>The policy should contribute positively to this objective through:</p> <ul style="list-style-type: none"> <li>• adopting high standards of sustainable design and construction for new build;</li> <li>• promoting combined heat and power schemes and other forms of CO<sub>2</sub> reduction;</li> <li>• promoting sustainable transport and compact design.</li> </ul> <p>However, the policy fails to adequately address climate change adaptation – in relation to future climate issues of flooding (this area is within the flood zone), summer overheating etc. This could be explored further in relation to sustainable design and construction (whilst noting that this only applies to new build).</p> <p>It also fails to address the issue of retrofitting: how the bulk of the areas existing buildings will reduce their impact on carbon emissions. In theory this could be covered under the catch all 'other effective forms of CO<sub>2</sub> reduction' but this needs to be more clearly defined.</p> <p>Issues of water conservation would presumably be included under high standards of sustainable design and construction (for new build at least).</p> <p>This part of the Borough is within Flood Zone 3a. The floodplain is defended by the Thames Barrier and built flood defences, but it is necessary to manage the residual risk of flooding (see annex G of PPS25 and its associated Practice Guide Companion) and flooding from other sources. The Environment Agency note:</p> <p><i>'Whilst much of the Thames Tidal defences along these frontages in the borough are in relatively good condition there are sections with some defects. Remediation and improvements to the flood defence walls should be required when riparian sites are redeveloped'.</i></p> <p>The policy should make reference to flooding issues and the need to manage flood risk, particularly in relation to riparian site development.</p>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	x	x	x	

<b>Policy PN1 – Waterloo</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<b>X</b>	<b>X</b>	<b>X</b>	The policy does not refer to waste issues. It should clarify what waste facilities may be needed in the vicinity and whether waste sites should be provided as part of physical infrastructure.
14. Air quality. To improve air quality.	<b>✓?</b>	<b>✓?</b>	<b>✓?</b>	Borough analysis shows that, despite expected improvements in air quality in Lambeth over the next few years, two pollutants, nitrogen dioxide and fine particulates, are likely to fail government targets. As a result of the most recent (stage 4) air quality assessment the Council has revised the extent of its designated Air Quality Management Area (AQMA) to cover the entire Borough.
				The policy should assist in tackling poor air quality by the promotion and improvement of public transport, reducing the need to travel (e.g. local jobs, on site accommodation at hospital and college), and improvements to the public realm and open space.
				<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	<b>✓✓</b>	<b>✓✓</b>	<b>✓✓</b>	The policy seeks to improve opportunities for local training through planning obligations. In addition, it seeks to provide education facilities as part of social infrastructure.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	<b>✓✓</b>	<b>✓✓</b>	<b>✓✓</b>	The policy seeks to support employment opportunities for local residents and promote new training opportunities. Provision of a range of social infrastructure elements should improve the ability of local people to live 'better for a given income'.
				The policy seeks to maintain the area's diverse employment offer relating to its status as an international centre for culture and arts; a pre eminent international, domestic and local tourist/leisure and entertainment area; and as a major location for offices, hotels, healthcare and higher education.
				A significant amount of tourist visitors would arrive by public transport.

<b>Policy PN1 – Waterloo</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓	✓	✓	Whilst the area is not a London Plan Area for Regeneration, it promotes development on previously used land, thus protecting environmental assets. The policy promotes significant improvements to the public realm.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓✓	✓✓	✓✓	The policy promotes a diverse and accessible employment offer for local people, protects existing employment uses, and promotes childcare.

<b>Policy PN1 – Waterloo</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b> Whilst the policy scores well on the social and environmental objectives, including transport and the built environment, it could give more attention to the needs of identified equality target groups. There are a number of issues relating to some of the environmental objectives where the policy could be tightened or clarified, in particular with relation to flooding, climate change adaptation, waste management and retrofitting existing buildings to help tackle climate change. In addition, there may also be a tension between the cultural/ tourism/ entertainment uses of the area and residential amenity which could be managed via partnership working (for example). Whilst the policy scores well on sustainable transport, it is not clear how much of a positive impact it will have on the area's air quality.				

#### **Uncertainties**

It is not clear what the needs are of particular equality target groups within the area.

#### **Recommendations/Mitigation**

- Address climate change adaptation issues, both in the design of new development and in seeking to retrofit existing buildings;
- Address the potential negative impacts of flooding by making reference to flood risk and the need for appropriate improvement measures, particularly in relation to any opportunities offered by development on riparian sites (e.g. improvements to flood defences);
- Clarify how the area contributes to the Borough's waste management approach;
- Identify and address any issues relating to the needs of particular equality target groups within the area;
- Ensure that water and sewerage infrastructure keeps pace with development.

Policy PN2 – Vauxhall		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement		
SA Objectives		Short term	Med term	Long term	SOCIAL		
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	?	?	?	?	The policy does not refer to crime or safety, although it should be part of good urban design. The policy promotes car free development and increases in public transport capacity, which should aid road safety issues. Studies on whether mixed use development is positive or negative in relation to crime are inconclusive.		
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓	✓	✓		The policy does not address climate change adaptation, even though parts of this area lie within Flood Zone 3a.		
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓?	✓?	✓?		The policy seeks a significant amount of new dwellings and new jobs, in line with London Plan targets: both of these are key determinants of health.		
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	XX	XX	XX		It also seeks improvements to the walking and cycling environment.		
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those	✓?	✓?	✓?		There is no reference to health services or facilities being provided as part of any community infrastructure.		
					The policy will improve access to:		
					<ul style="list-style-type: none"> <li>• Jobs</li> <li>• Local services</li> <li>• Public spaces (walking and cycling)</li> <li>• Retail</li> </ul>		
					Local services are not defined and so the policy is scored as providing uncertain benefit to some extent.		
					The policy is unconvincing in terms of provision of essential infrastructure required to keep pace with population growth. There is no reference to any water, sewerage, health, education or green infrastructure.		
					The policy seeks to create 8000 new jobs in an area with public transport limitations and does not set out how this may be addressed in a sustainable manner.		
					The policy will contribute to tackling social exclusion to some degree by the provision of new homes, new jobs and improvements to transport and the public realm.		

Policy PN2 – Vauxhall		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement		
SA Objectives		Short term	Med term	Long term			
most liable to experience discrimination, poverty and social exclusion.					The area lies within a London Plan Area for Regeneration, meaning it suffers some of London's/Lambeth's worst levels of deprivation: this status should be referred to with the associated London Plan policy 2A.7 requirements (these include improvements to learning and skills, health, safety, access, employment, environment and housing).		
6. Housing. Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	✓✓	✓✓	✓✓		Although the supporting text to the policy refers to the area supporting a number of gay nightlife venues, the needs of this and other equality target groups are not referred to in the policy.		
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓	✓	✓		The policy seeks to meet London Plan housing targets, including affordable housing, and supporting the highest standards of sustainable design and construction. It also seeks to preserve and enhance distinct quarters. Given the relatively segmented nature of the area (e.g. caused to some extent by the viaducts), there would be less of an issue relating to potentially incompatible uses such as nightlife, industry and residential.	<p>The policy should contribute to the achievement of this objective by:</p> <ul style="list-style-type: none"> <li>• improvements to the public realm and open spaces;</li> <li>• seeking to create distinctive quarters and neighbourhoods, including a residential-led mixed use quarter.</li> </ul>	
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓	✓	✓		<b>ENVIRONMENTAL</b>	The policy seeks to promote development which is appropriate to the different characteristics and roles of 'distinct character areas', respecting strategic views, local contextual considerations, including heritage assets and protecting the character of the historic environment.	
						The policy identified an area with potential for a cluster of tall buildings. It should state that this should be appropriate to its settings and have due regard to strategic views (as in the Waterloo policy).	There is no mention of archaeological issues.

Policy PN2 – Vauxhall		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
SA Objectives		Short term	Med term	Long term	
9. Transport and travel.	Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	X?	X?	X?	<p>The policy seeks 'substantial improvements in the quality, access and capacity of Vauxhall underground and rail stations, bus services, enhancement of the quality of public transport interchange, highway improvements throughout the Vauxhall area particularly seeking the removal of the one-way traffic system'. It also states that all new development should be car free.</p> <p>However, as the supporting text demonstrates, there is a risk that improvements to public transport capacity may not be capable of being met or delivered. This is particularly concerning given the number of new jobs which are proposed, many of which would be located in areas away from current public transport interchanges. As the draft Core Strategy states:</p> <p><i>'However, public transport capacity is currently limited. There is no spare capacity at the Vauxhall Overland Rail Station without significant improvement works, and station usage is forecast to rise by 20 per cent by 2014. Planned upgrades to the Victoria Line Underground Station at Vauxhall will provide limited extra capacity, but this will also be absorbed by the current demand and the forecast future increase in usage, which does not include significant development in Vauxhall'.</i></p> <p>How feasible is it to deliver 8000 new jobs – all car free?</p> <p>However, we note that the Council has plans to develop a 'tariff based contribution system for planning obligations to provide for necessary transport improvements'.</p> <p>The policy does not specifically refer to biodiversity – not surprisingly as this is a highly urbanised area with few valued accessible wildlife sites and habitats (with the exception of the River Thames).</p> <p>However, it should result in a slightly improved public space/ public realm offer.</p>
10. Biodiversity.	To conserve and enhance biodiversity, and to bring nature closer to people.	0	0	0	

Policy PN2 – Vauxhall		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
SA Objectives		Short term	Med term	Long term	
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.		✓	✓?		<p>The policy should contribute positively this objective through:</p> <ul style="list-style-type: none"> <li>• adopting high standards of sustainable design and construction for new build;</li> <li>• promoting district heating networks and other forms of CO<sub>2</sub> reduction;</li> <li>• promoting car free development.</li> </ul> <p>However, the policy fails to adequately address climate change adaptation – in relation to future climate issues of flooding (this area is within the flood zone), summer overheating etc. This could be explored further in relation to sustainable design and construction (whilst noting that this only applies to new build).</p> <p>It also fails to address the issue of retrofitting: how the bulk of the areas existing buildings will reduce their impact on carbon emissions. In theory this could be covered under the catch all 'other effective forms of CO<sub>2</sub> reduction' but this needs to be more clearly defined.</p>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.		✗	✗	✗	<p>Issues of water conservation would presumably be included under high standards of sustainable design and construction (for new build at least).</p> <p>This part of the Borough is within Flood Zone 3a. The floodplain is defended by the Thames Barrier and built flood defences, but it is necessary to manage the residual risk of flooding (see annex G of PPS25 and its associated Practice Guide Companion) and flooding from other sources. The Environment Agency note:</p> <p><i>'Whilst much of the Thames Tidal defences along these frontages in the borough are in relatively good condition there are sections with some defects. Remediation and improvements to the flood defence walls should be required when riparian sites are redeveloped'.</i></p> <p>The policy should make reference to flooding issues and the need to manage flood risk, particularly in relation to riparian site development.</p>

<b>Policy PN2 – Vauxhall</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/ improvement</b>
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The policy does not refer to waste issues. It should clarify what waste facilities may be needed in the vicinity and whether waste sites should be provided as part of physical infrastructure.
14. Air quality. To improve air quality.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	There is no reference to waste management facilities: whilst the area is not a Preferred Industrial Location in the London Plan, it presumably is a Local Employment Area and therefore would be suitable (in London Plan terms) as a broad location for much needed waste management facilities. Borough analysis shows that, despite expected improvements in air quality in Lambeth over the next few years, two pollutants, nitrogen dioxide and fine particulates, are likely to fail government targets. As a result of the most recent (stage 4) air quality assessment the Council has revised the extent of its designated Air Quality Management Area (AQMA) to cover the entire Borough.
					Given our concerns over improvements in public transport capacity, the policy may not contribute positively to this objective.
					<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The policy makes no reference to skills, training or education.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The policy seeks the creation of 8000 new jobs (including retail, hotel, leisure, entertainment and other commercial uses in line with its Central Activity Zone designation). Given that this is a London Plan Area for Regeneration this scores positively on this objective.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The area is a London Plan Area for Regeneration and the policy promotes development on previously used land, thus protecting environmental assets. The policy promotes significant improvements to the public realm.

<b>Policy PN2 – Vauxhall</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/ improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓	✓	✓	The policy will improve employment opportunities for local people and provide additional housing near places of work.

Policy PN2 – Vauxhall		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
SA Objectives		Short term	Med term	Long term	
<b>Conclusions</b>	The policy aims to deliver London Plan targets for 3,500 new dwellings and 8,000 new jobs in a London Plan Opportunity Area. Therefore, it scores positively on issues relating to health (as homes and jobs are key determinants of health), housing, liveability and economic issues. The main concern with the policy is whether the new jobs proposed are capable of being supported by concomitant public transport capacity and improvements. The policy is far less convincing than the Waterloo policy in terms of enabling essential infrastructure (physical, social) to keep pace with growth: it may improve access to jobs and housing – but there is little detail on other essential infrastructure such as schools, health facilities and services, water and sewerage. If this results in greater road travel, particularly private car use it could worsen existing congestion and contribute to air quality and climate change problems. There is no reference to waste management facilities: whilst the area is not a Preferred Industrial Location in the London Plan, it presumably is a Local Employment Area and therefore would be suitable (in London Plan terms) as a broad location for much needed waste management facilities. The area falls within Flood Zone 3a and therefore we would expect reference to flood risk and the need to maximise opportunities to strengthen defences when opportunities arise. The policy fails to adequately address climate change adaptation (in addition to flooding such as summer overheating). This could be explored further in relation to sustainable design and construction (whilst noting that this only applies to new build). It also fails to address the issue of retrofitting: how the bulk of the areas existing buildings will reduce their impact on carbon emissions. In theory this could be covered under the catch all 'other effective forms of CO <sub>2</sub> reduction' but this needs to be more clearly defined. In addition, the area lies within a London Plan Area for Regeneration, meaning it suffers some of London's/Lambeth's worst levels of deprivation: this status should be referred to with the associated London Plan policy 2A.7 requirements (these include improvements to learning and skills, health, safety, access, employment, environment and housing). Although the supporting text to the policy refers to the area supporting a number of gay nightlife venues, the needs of this and other equality target groups are not referred to in the policy.				

### Uncertainties

Uncertainties relate to:

- the degree to which new jobs and housing are supported by essential physical and social infrastructure, in particular public transport capacity.
- whether there are specific needs relating to identified equality target groups and how these could be met.

### Recommendations/Mitigation

- The policy identified an area with potential for a cluster of tall buildings. It should state that this should be appropriate to its settings and have due regard to strategic views (as in the Waterloo policy).
- Address climate change adaptation issues, both in the design of new development and in seeking to retrofit existing buildings;
- Need to address the potential negative impacts of flooding by making reference to flood risk and the need for appropriate improvement measures, particularly in relation to any opportunities offered by development on riparian sites (e.g. improvements to flood defences);
- Clarify how the area contributes to the Borough's waste management approach;
- Identify and address any issues relating to the needs of particular equality target groups within the area;
- Ensure that water and sewerage infrastructure keeps pace with development;
- Clarify what 'other effective forms of CO<sub>2</sub> reduction' means.

Policy PN3 – Brixton					What is the predicted effect on each SA objective?	Justification for assessment and recommendations for mitigation/ improvement
SA Objectives	Short term	Med term	Long term	SOCIAL		
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	✓	✓	✓	Sensitive and sustainable regeneration of Brixton in the manner described should contribute to a reduction in 'crime opportunities' and fear of crime. Protection of existing employment and creating new employment opportunities should also contribute positively, as will delivery of physical infrastructure.	The policy also seeks transport improvements which could contribute positively to this objective.	The adoption of 'One Planet Living' principles should address some future proofing issues, but it is not stated what these principles are.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓?	✓?	✓?	Health or health facilities are not mentioned specifically, but there are reference to provision of new community facilities and physical infrastructure.	Provision of local jobs and new housing would also contribute positively to health issues.	The sensitive and sustainable regeneration approach should improve health and well-being and contribute to more healthy neighbourhoods, for example by promoting active travel (walking and cycling) and heating networks.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services	✓?	✓?	✓?	There is no indication that access to health care centres would be improved.	The policy seeks to improve local access to: • Shops • Jobs • Leisure, entertainment and nightlife • Public realm • 'community facilities' • Training.	The policy seeks to improve local access to:

<b>Policy PN3 – Brixton</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
and facilities.				Community facilities are not defined, so whilst the supporting text contains considerable detail about the need for more schools in Brixton, this is not reflected in the policy. Similarly, there is no reference to nurseries/ child care facilities, libraries, places of worship, community centres, or police and emergency services.
				The policy could be improved by addressing the schools issue and how additional provision (or that currently in the pipeline) will be addressed. As the text notes:
				<i>'There is an identified shortage of primary school places in Brixton with a requirement for one additional two form entry school. There is also potential to locate an additional new City Academy to meet demand for places in the Brixton Hill/Streatham Hill area, subject to final agreement on a site.'</i>
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	x	x	x	With the exception of transport, these issues are not addressed.
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	✓	✓	✓	Brixton contains the highest levels of deprivation in the borough and suffers from high levels of crime and fear of crime. It is also a place of significance to London's African and Caribbean communities.  The sensitive and sustainable regeneration approach should improve equitable outcomes for all. In particular it should: <ul style="list-style-type: none"> <li>• safeguard and improve the distinctive cultural offer of Brixton;</li> <li>• improve the local environment;</li> <li>• create employment and housing opportunities</li> <li>• encourage social cohesion through vibrant mixed use living.</li> </ul>
6. Housing. Ensuring	✓	✓	✓	However, there are issues about other aspects of social infrastructure which are not addressed, and how these may impact upon equitable outcomes for residents, e.g. school places.  The policy will deliver new housing and commits to 'One Planet Living'

Policy PN3 – Brixton					What is the predicted effect on each SA objective?	Justification for assessment and recommendations for mitigation/improvement
SA Objectives	Short term	Med term	Long term			
everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.						principles, which should ensure sustainable design (see conclusions below). In terms of protecting amenity, the policy seeks the inclusion of housing as part of mixed development: <i>'where it would not displace other priority uses, have acceptable levels of amenity and add to the vitality of the area'.</i>
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓	✓	✓			The strategy should contribute positively to this objective, via: <ul style="list-style-type: none"><li>• improvements to the public realm including new spaces and pocket parks;</li><li>• promote mixed use vibrant living;</li><li>• celebrate and respect distinctiveness;</li><li>• improvement of pedestrian environment;</li><li>• new jobs and housing which should encourage people to put down roots; and</li><li>• public transport improvements.</li></ul>
					<b>ENVIRONMENTAL</b>	
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓?	✓?	✓?			The policy scores strongly on cultural identity and cultural issues (including public art and new centres), improving the public realm and open space and recognising local character.  There is less of a focus on addressing built and historic building issues, hence the uncertainty in the scoring.
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓	✓	✓			The policy seeks further public transport and pedestrian improvements and adopts the 'One Planet Living' principles.  The policy seeks to enhance Brixton's role as a town centre, by safeguarding existing attractions and developing new ones (new employment uses, green businesses, public realm spaces, new retail etc). This should assist in meeting more of people's needs locally.

<b>Policy PN3 – Brixton</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
10. Biodiversity, To conserve and enhance biodiversity, and to bring nature closer to people.	<b>0</b>	<b>0</b>	<b>0</b>	<p>There is little wildlife habitat or green space in Brixton, therefore the policy will have a negligible impact on this objective.</p> <p>It is noted that the public realm will be improved, and pocket parks created; consideration should be given to designing some of these areas with wildlife in mind, if appropriate (i.e. to bring nature closer to people).</p>
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	✓	✓	✓	<p>The policy should contribute well to this objective through:</p> <ul style="list-style-type: none"> <li>• implementing a town centre energy strategy, with energy centres and heating networks;</li> <li>• adopting the 'One Planet Living' principles;</li> <li>• promotion of green industries;</li> <li>• public transport improvements; and</li> <li>• strengthening Brixton's town centre role and functions (meeting needs locally).</li> </ul>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	✓?	✓?	✓?	<p>There is nothing specific on climate change adaptation.</p> <p>Brixton is not in a flood zone. The adoption of 'One Planet Living' principles should assist in water conservation issues, but this is not specified.</p>
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	✓?	✓?	✓?	<p>The policy refers to the possible location of new sustainable waste management facilities at Somerleyton Road. The adoption of 'One Planet Living' principles should also assist in moving waste up the waste hierarchy.</p>

<b>Policy PN3 – Brixton</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
14. Air quality. To improve air quality.	✓	✓	✓	The policy seeks public transport, public realm and walking/ cycling improvements. Meeting needs locally by strengthening Brixton's town centre role and promoting mixed use development should also help to reduce the need to travel. These aspects should assist in tackling poor air quality issues.
				<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	✓✓	✓✓	✓✓	<p>The policy is strong on maximising opportunities for training and up skilling, including:</p> <ul style="list-style-type: none"> <li>• Developing Brixton as a creative hub</li> <li>• Providing affordable workspace;</li> <li>• providing employment and training opportunities.</li> </ul>
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓✓	✓✓	✓✓	<p>Again, the policy is strong in this area, protecting existing employment uses and seeking new opportunities (e.g. in creative arts, green business etc), and creating a range of opportunities for smaller organisations and individuals.</p>
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓✓	✓✓	✓✓	<p>The policy will focus much needed sensitive and sustainable regeneration in an area of high deprivation. It supports innovative opportunities, including in the creative arts and green sectors, and promotes improvements to the public realm. In focusing development in an existing centre and on previously developed land it should contribute to the protection of the Borough's (and London's) soil assets.</p>
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓✓	✓✓	✓✓	<p>This policy should contribute positively to tackling worklessness, through:</p> <ul style="list-style-type: none"> <li>• creating new and innovative employment opportunities, including variable sized units;</li> <li>• encouraging more locally accessible jobs;</li> <li>• creating employment opportunities in an ethically diverse centre.</li> </ul> <p>There is no mention of improving childcare facilities.</p>

<b>Policy PN3 – Brixton</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>Conclusions</b>				<p>Generally this policy scores well across most objectives. In strengthening Brixton's role as a town centre, with an increased offer related to employment (including cultural and green businesses), housing and various town centre facilities, it should reduce people's need to travel more widely. In addition, the commitment to an energy strategy, the promotion of green businesses, and the adoption of 'One Planet Living' principles should all help to make Brixton a sustainable centre (and we note local initiatives such as 'Brixton Green' and 'Transition Town Brixton', which should assist in the development of this new green identity.</p> <p>The only significant negative involves a question mark over the provision of appropriate physical and social infrastructure to support its expanded role. There is a need for more school places in Brixton, yet the policy does not address this issue. It also omits to address issues around health and water infrastructure. Climate change adaptation is not addressed, nor is the built/historic environment particularly well dealt with.</p>

#### **Recommendations/Mitigation**

- Add policy wording on social and physical infrastructure needed to keep pace with Brixton's development, particularly schools, health facilities and water/ sewerage;
- Clarify One Planet Living principles;
- Address climate change adaptation issues, both in the design of new developments and in seeking to retrofit existing buildings;
- Seek biodiversity opportunities in the public realm, pocket park developments, where appropriate; and
- Improve wording in relation to built and historic environment.

Policy PN4 – Streatham		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement	
SA Objectives		Short term	Med term	Long term	SOCIAL	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.		✓?	✓?	✓?	No specific reference to crime or safety, but should be a general benefit through regeneration and public realm improvements.	The High Road is particularly badly congested and various transport improvements assist safety issues.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.		✓?	✓?	✓?	No reference to climate change adaptation.	Regeneration should provide health benefits and various improvements to the pedestrian environment and the public realm, including support for walking and cycling, should also assist. No mention is made of health facilities, although the supporting text refers to a new health PCT facility at Gracefield Gardens. Various community services are referred to but not specified.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.		✓?	✓?	✓?	The policy seeks to improve access to:	<ul style="list-style-type: none"> <li>• New retail facilities;</li> <li>• Jobs</li> <li>• Housing</li> <li>• Leisure, recreation and entertainment facilities;</li> <li>• Library;</li> <li>• Public transport;</li> <li>• Open space/ public realm.</li> </ul>
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.		✗	✗	✗	The policy refers to transport and public open space infrastructure.	<p>The supporting text refers to new healthcare facilities in the area, and two 'over-subscribed' schools.</p> <p>There is nothing on water or sewerage.</p> <p>The policy should address the issues of school places and physical infrastructure (e.g. water and sewerage) needed to accommodate growth.</p>

5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	?	?	?	The area is not an Area for Regeneration in the London Plan. However, there is nothing in the policy to suggest that the specific needs of equality target groups have been identified or addressed. The bulk of the policy concerns strengthening the area's retail, commercial and leisure/entertainment offer.
6. Housing. Ensuring everyone has the opportunity for an affordable, decent home, quiet enjoyment of that home and the protection of local amenity.	✓?	✓?	✓?	The policy includes proposals for housing in certain areas including mixed use development.  There is no mention of family units or sustainable design and construction.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓?	✓?	✓?	The policy supports improvements to the public realm and open spaces, including support for walking and cycling.  However, there is little else to support this objective.
<b>ENVIRONMENTAL</b>				
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	?	?	?	The policy seeks 'appropriate regeneration that is sensitive to the centre's conservation area status and valued heritage assets'. However, it is not clear how this will be achieved. Indeed, taller landmark buildings are envisaged in two locations, plus a wealth of other developments (new large food superstore etc.).
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	x	x	x	Whilst various public and sustainable transport improvements are referred to, the High Road suffers from major congestion. The improvements appear rather minor (e.g. station refurbishment) given the existing problems and the intention to attract more people to this centre: a new town centre car park is proposed along with a major food superstore (presumably with parking facilities).  There is nothing in the policy to suggest that reliance on the private car will be altered nor the level of road transport decreased: in fact quite the reverse.

10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	✓?	✓?	✓?	There may be minor benefits to biodiversity in terms of public realm and open space improvements.
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	✗	✗	✗	There is nothing in the policy to suggest an improvement to the current picture (mitigation or adaptation): in fact, it may lead to worsening in terms of carbon emissions through increased road transport reliance.
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	✗	✗	✗	There is nothing in the policy to suggest an improvement to the current picture in terms of water conservation.  The area lies outside of the flood plain.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	✗	✗	✗	There is nothing in the policy to suggest an improvement to the current picture in terms of sustainable waste management.
14. Air quality. To improve air quality.	✗	✗	✗	There is nothing in the policy to suggest an improvement to the current picture in terms of air quality. Given likely increases in road transport reliance, the local air quality may worsen (the whole of the Borough is an Air Quality Management Zone).
15. Education and skills. To maximise the education and skills levels of the population.	?	?	?	<b>ECONOMIC</b>  There is nothing in the policy to encourage training or up skilling.

16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓?	✓?	✓?	The policy supports the development of the area as a town centre, with more of the same retail and entertainment/ leisure uses.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓?	✓?	✓?	<p>The policy seeks to concentrate development and retail activity at an existing town centre so makes efficient use of land. It also includes improvements to the public realm and walking, cycling.</p> <p>It is difficult to envisage the proposals as 'innovative or multifunctional' use of land.</p>
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓?	✓?	✓?	<p>The policy offers employment opportunities and seeks to protect existing uses in the town centre, including some mixed use residential.</p> <p>There is nothing on child care.</p>

### Conclusions

The policy scores negatively, or uncertain, on a number of objectives due to lack of attention to: energy and climate change (mitigation or adaptation), physical and social infrastructure, the needs or equality target groups, sustainable design and construction, details on heritage conservation, water issues, waste management, training and skills, and child care facilities. The policy aims to strengthen the retail and entertainment offer, but appears to provide little else for local people. The main concern is that existing road traffic problems will worsen and the proposals will foster greater reliance on the private car, thus worsening congestion and air quality issues.

### Uncertainties

The needs of equality target groups

### Recommendations/ Mitigation

If this policy is to improve the sustainability of the area, the following issues need to be clarified:

- details of how built and historic heritage issues will be addressed;
- what role will sustainable design and construction play?.

Policy PNS – Clapham		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/ improvement	
SA Objectives		Short term	Med term	Long term	SOCIAL	
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	✓?	✓?		✓?	No specific reference to crime or safety, but should be a general benefit through regeneration and public realm improvements.	The evening/ night time economy places a strain on local residential amenity.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓	✓		✓	No reference to climate change adaptation.	The policy makes reference to improved health care facilities, and there should be other benefits from new leisure and community facilities and new housing.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓?	✓?		✓?	The policy seeks improved access to: <ul style="list-style-type: none"> <li>• Health care facilities</li> <li>• Community facilities</li> <li>• Leisure</li> <li>• Library</li> <li>• Council customer service centre</li> <li>• Jobs (e.g. creative arts)</li> </ul>	Open space is well served by Clapham Common.  The supporting text refers to school place availability. It is not clear from the text whether there is a shortage of school places in Clapham – if there is then this issue should be addressed in the policy. The SA Scoping Report notes:  <i>'In recent years the pressure on reception places throughout Lambeth has been extreme and is projected to increase. As an emergency measure, the council has added temporary classrooms in primary schools in 2007 and 2008 and is projecting to have to do the same for the next few years whilst</i>

				<p>a more strategic expansion programme is instigated. It is therefore important that any proposed housing developments or regeneration programmes are sensitive to the issue of community sustainability with regard to primary education, and provision for additional primary places is built into any framework. Lambeth's Children's and Young Persons Scheme is looking closely at the capacity of the primary school estate to expand but the likelihood is that in the future additional primary schools will be required and the sites for the school(s) necessary to meet the increased demand created must be provided as part of housing schemes and funding to build the schools come from S106 payments'.</p>
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	X?	X?	X?	<p>See comments above in relation to school places.</p> <p>There is nothing in the policy about improving transport capacity despite acknowledged problems in this area with the Northern Line.</p> <p>There is nothing on water or sewerage infrastructure (although little growth is envisaged for this area).</p> <p>Health issues are addressed.</p>
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	✓?	✓?	✓?	<p>The area has issues of deprivation, including the Clapham Park Estate, the largest housing estate in the Borough. It also has some of the most expensive housing.</p> <p>A number of new or upgraded community facilities are proposed which should contribute to more equitable outcomes.</p>
6. Housing. Ensuring everyone has the opportunity for an affordable, decent home, quiet enjoyment of that home and the protection of local amenity.	✓?	✓?	✓?	<p>The policy seeks the provision of new housing as part of major site redevelopment.</p> <p>There is no reference to the need for family units or of sustainable design and construction.</p>
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social	✓?	✓?	✓?	<p>The policy supports the provision of additional community facilities which should contribute positively to the achievement of this objective.</p> <p>The area has a high socio-economic diversity and beyond new</p>

cohesion, sustainable lifestyles and a sense of place.				community facilities there is little in the policy that seeks to drive improved social cohesion.
<b>ENVIRONMENTAL</b>				
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓	✓	✓	The policy seeks to reinforce the area's distinctive character associated with the Old Town, its historic heritage and Clapham Common, although there is no detail provided.  In addition, it seeks to encourage provision in particular for cultural, creative, visual and performing arts, while controlling the level of food and drink uses.
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✗	✗	✗	There is no reference to transport or travel in the policy, despite acknowledge public transport capacity problems in the area.
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	✓?	✓?	✓?	Clapham Common has biodiversity value and will be safeguarded.
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	✗	✗	✗	There is nothing in the policy to suggest an improvement to the current picture (mitigation or adaptation); in fact, it may lead to worsening in terms of carbon emissions if public transport capacity problems are not addressed.

12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	<b>X</b>	<b>X</b>	<b>X</b>	There is nothing in the policy to suggest an improvement to the current picture in terms of water conservation.  The area lies outside of the flood plain.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<b>X</b>	<b>X</b>	<b>X</b>	There is nothing in the policy to suggest an improvement to the current picture in terms of sustainable waste management.
14. Air quality. To improve air quality.	<b>X</b>	<b>X</b>	<b>X</b>	There is nothing in the policy to suggest an improvement to the current picture in terms of air quality. Given likely existing problems with public transport capacity, the local air quality may worsen (the whole of the Borough is an Air Quality Management Zone).
				<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	<b>?</b>	<b>?</b>	<b>?</b>	There is nothing in the policy to encourage training or up skilling.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓	✓	✓	The policy will support the creative, visual and cultural arts sector, thus contributing to a more diverse economy. It also supports new community/ public sector employment uses.

17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓	✓	✓	The limited development proposed is on previously developed sites, and there will be some limited new job opportunities in an area with deprivation.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	?	?	?	It is unclear whether the policy will have a demonstrable positive impact on worklessness. There may be some limited job and housing opportunities, but there is no reference to improved child care (unless it forms part of the community facilities that are referred to).

#### **Conclusions**

The policy seeks limited change in seeking to reinforce the character and nature of the area. There will be some limited social benefits, but there is no reference to a suite of environmental issues. Despite acknowledged public transport capacity problems in the area, the policy is silent on this issue. As such, the local air quality is likely to worsen.

#### **Recommendations/Mitigation**

- Address public transport capacity issues for existing and future residents/ uses;
- Address sustainable infrastructure issues (water, waste, new build etc);
- Clarify the issue of school place need;
- Address the need to improve social cohesion in such a socio-economically diverse area.

<b>Policy PN6 – Stockwell</b>		<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>		<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	<b>SOCIAL</b>
1. Crime and safety.		✓	✓	✓	The policy aims to tackle the perception of Stockwell as an unsafe, anti-pedestrian area by developing and enhancing its sense of place by improvement to traffic and environmental conditions for pedestrians; and creating public open spaces and linkages throughout the area, including improvements to housing estates and connections to and within housing estates.
					Stockwell is segregated by fast flowing arterial highways serving as transport corridors for Greater London. This hinders pedestrian movement and limits the potential for a cohesive community. As the supporting text states:
					<i>'An over-arching priority is to define gateways to the area and reassert Stockwell's identity as a vibrant district centre. Priorities for improvement include recapturing positive street connections and safe and direct pedestrian routes; unlocking access to and through estates; reintroducing entrances on the street; introducing more active retail frontages; giving positive use and identity to underused open spaces; and generally using various methods to create a pedestrian friendly environment'.</i>
2. Health and well being.		✓	✓	✓	There is no mention of climate change adaptation issues. The supporting text states that:
Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.					<i>'There are a number of smaller community facilities, including the recently built Springfield Centre which combines community meeting space with healthcare facilities.'</i>
					<i>In terms of uses, the Lambeth Primary Care Trust wishes to locate one of its network of Neighbourhood Resource Centres in Stockwell'.</i>
3. Access and services.		✓	✓	✓	Encouraging new commercial and employment uses, improving the public realm and the pedestrian environment and tackling the 'unsafe' image of some of the area will all contribute to improved local health and well-being.
Create an environment					Future development of the area has in part been led by the community itself, as the text states:

that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.					'A master-plan was commissioned in 2008 by the Stockwell Partnership to build on an earlier master-plan prepared in 2001 and a subsequent European funded Urban II regeneration programme. This has involved extensive community engagement, uniquely led by the community itself. The result of this involved an analysis of the current issues facing Stockwell as a place. It has a defined vision and project bank for its future development'.
					The policy should help to improve access to:
					<ul style="list-style-type: none"> <li>• Retail</li> <li>• Jobs</li> <li>• Open space</li> <li>• Transport</li> </ul>
					In addition ,the policy will improve general access through its housing estates.
					An important local concern is that the available shopping in Stockwell is limited, comprising small convenience stores with no major retail outlets. There are various food and drink uses in the centre but residents have to travel out of the area for most shopping requirements. Opportunities to improve this locally will be sought.
					Stockwell High School is a 1,300 place secondary school close to the centre; it is being redeveloped on site to provide replacement new school buildings as part of the Council's Building Schools for the Future programme.
					The supporting text for the policy refers to health and education facilities, although there is no indication if either will meet future requirements (particularly school places).
					The policy may result in small small improvements to open spaces.
					Stockwell is very well serviced by public transport with a tube station at its heart served by the Victoria and Northern lines. Together with the various bus routes, this provides a popular transport interchange at Stockwell Cross. There is nothing in the policy that identifies or seeks to address any future transport capacity issues.
					There is no mention of water or sewerage issues.
					The policy seeks to improve local environmental conditions for some of the most deprived parts of the Borough/ London, and therefore will contribute to

outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.				the achievement of this objective.  However, there is no reference to any particular needs of identified equality target groups.
6. Housing. Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	✓?	✓?	✓?	Whilst there is nothing in the policy or its supporting text about new build (the area is one of the most densely populated in the UK), the emphasis of the policy is on improving conditions for existing housing and residents.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓✓	✓✓	✓✓	The future development of the area appears to be community led, and the policy seeks to improve the public realm and the pedestrian environment, including open space.
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, protecting open space, valued views and historic assets.	?	?	?	<b>ENVIRONMENTAL</b>  Existing Conservation Areas will be protected and the policy seeks to retain and enhance sense of place.  There is nothing specific on built heritage within the policy.

<p>9. Transport and travel.</p> <p>Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.</p>	<p><b>✓?</b></p> <p><b>✓?</b></p> <p><b>✓?</b></p>	<p>As the supporting text states, 'Stockwell is very well serviced by public transport with a tube station at its heart served by the Victoria and Northern lines. Together with the various bus routes, this provides a popular transport interchange at Stockwell Cross'. Car ownership is low.</p> <p>However, most residents travel out of the area for employment, and employment centres in Stockwell have progressively disappeared since 2000 (primarily lost to residential use). The principal remaining local employment opportunities in Stockwell are in shops, education, healthcare and the voluntary sector.</p> <p>Therefore, the policy seeks to safeguard existing employment generating uses and encouraging more such employment opportunities. This should help to reduce the need to travel. Most people will continue to travel out of the area for work, but these journeys are primarily by sustainable modes (public transport, cycling).</p>
		<p>The policy is unclear whether there are public transport capacity issues which need to be addressed to keep pace with growth. Whilst there appears to be minimal residential growth outlined in the policy, growth elsewhere in the system in Lambeth could exacerbate any local capacity issues.</p>
<p>10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.</p> <p>11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.</p>	<p><b>0</b></p> <p><b>0</b></p> <p><b>0</b></p>	<p>No significant relationship.</p>

12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	<b>X</b>	<b>X</b>	<b>X</b>	There is nothing in the policy to suggest an improvement to the current picture in terms of water conservation.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<b>X</b>	<b>X</b>	<b>X</b>	<p>There is no reference to sustainable design and construction techniques or water conservation issues in relation to estate improvements.</p> <p>The area is not in the flood plain.</p>
14. Air quality. To improve air quality.	<b>✓?</b>	<b>✓?</b>	<b>✓?</b>	<p>There is nothing in the policy to suggest an improvement to the current picture in terms of sustainable waste management.</p> <p>There is no reference to sustainable design and construction techniques or waste management issues in relation to estate improvements.</p>
15. Education and skills. To maximise the education and skills levels of the population.	<b>?</b>	<b>?</b>	<b>?</b>	<p>There is nothing in the policy on education or skills.</p>
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	<b>0</b>	<b>0</b>	<b>0</b>	<p>The policy seeks to retain existing employment uses and encourage new opportunities, but these do not appear to be that significant, and the vast majority of working residents will still commute out of the area to work.</p>

17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓	✓	✓	The main regeneration aspects of the policy concern the improvements to existing housing estates, including improvements to the public realm and pedestrian environment, which will benefit some of the most deprived communities in the borough.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓?	✓?	✓?	<p>Most residents travel out of the area for employment and this situation is likely to continue, despite the policy seeking to protect current employment sites and encourage new employment opportunities. There may be a slight improvement.</p> <p>No references to childcare or affordable housing.</p>

#### Conclusions

The policy scores positively on many of the social objectives, as its main focus is in improving the local environment of existing housing estates. Public transport is already good and although the policy seeks to retain existing employment and seek opportunities for new jobs, it is likely that the vast majority of working residents will still commute out of the area to work. The vast majority of these journeys are by public transport. The policy scores less well on the environmental sustainability objectives, where there is no mention of issues around climate change (mitigation or adaptation), water conservation or waste management: this could result in opportunities being missed when improvements are made to existing housing estates.

#### Uncertainties

- whether there are current capacity issues with public transport in the area, especially with growth expected in other parts of the Borough/ system;
- any specific needs of equality target groups.

#### Recommendations/Mitigation

- The policy should ensure that sustainability opportunities are maximised for improvements to existing housing estates, e.g. in relation to low carbon and reduced climate change emissions, climate change adaptation (e.g. addressing summer overheating), water conservation and assisting sustainable waste management and should cross refer to other relevant core policies, such as S9, S10 and S11.

<b>Policy PN3 – Oval</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/improvement</b>		
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	<b>SOCIAL</b>
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	?	?	?	The policy seeks improvements to the public realm, including for traffic and pedestrians.  There is no specific reference to crime, or to climate change adaptation.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓?	✓?	✓?	Some aspects of the policy should contribute to improved health in the long term, including improvements to the public realm and the pedestrian environment, improved community facilities, and maximising opportunities for new employment uses and new housing.  There is no reference to health, or improved local health facilities/ services.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓?	✓?	✓?	The policy seeks to improve access to a range of community facilities, as well as new housing and jobs.  However, there is nothing specific about which elements of social infrastructure will be improved/ provided (e.g. health, schools etc).
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	x	x	x	There is very little in the policy or supporting text to provide assurance that these essential infrastructure needs will be met.  For example, there is no mention of school, health, water or transport capacity issues.
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to	✓?	✓?	✓?	The main element of the policy is to secure greater community benefit from the Oval Stadium, which should make a significant contribution to improving equitable outcomes.  There is no information on the needs of local equality target

experience discrimination, poverty and social exclusion.				groups.
6. Housing. Ensuring everyone has the opportunity for an <u>affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.	✓?	✓?	✓?	The policy seeks opportunities for new housing and also seeks to improve the public realm, the pedestrian environment and local community facilities.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓	✓	✓	The policy seeks improvements to the public realm and pedestrian environment, as well as increased community benefits from the Oval Stadium.
				<b>ENVIRONMENTAL</b>
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	?	?	?	The policy includes supporting and enhancing the heritage quality and attributes of the conservation area and St Mark's church. However, it also supports the use of its churchyard for community and town centre uses.

9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓?  ?	✓?  ?	✓?  ?	The policy includes several aspects which should contribute to a reduction in the need to travel: new and enhanced community facilities, retail outlets, employment opportunities and housing. There are also proposed improvements to the pedestrian environment.
				The centre is very well served by public transport with a tube station at its heart served by the Northern line which together with the various bus routes makes it a popular transport interchange. The roads are very busy.
				There is no indication if there are existing or potential future public transport capacity issues.
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	?	?	?	Kennington Park provides some local nature conservation amenity and is safeguarded.
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	x	x	x	<p>There will be improvements to the public realm.</p> <p>There is nothing in the policy to suggest an improvement to the current picture (mitigation or adaptation).</p> <p>There is no reference to sustainable design and construction techniques and/or cross reference Policy S11.</p>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	x	x	x	<p>There is nothing in the policy to suggest an improvement to the current picture in terms of water conservation.</p> <p>There is no reference to sustainable design and construction techniques and/or cross reference Policy S11.</p> <p>The area is located in flood zone 3a, yet there is no reference to flood risk.</p>

13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<b>X</b>	<b>X</b>	<b>X</b>	There is nothing in the policy to suggest an improvement to the current picture in terms of sustainable waste management.  There is no reference to sustainable design and construction techniques.
14. Air quality. To improve air quality.	✓?	✓?	✓?	There may be a slight beneficial contribution to improving air quality through the various aspects referred to under objective 9 above which would reduce the need to travel.
				<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	?	?	?	There is nothing in the policy on education or skills.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓?	✓?	✓?	The area lies in a London Plan Area for Regeneration and would provide some new opportunities for local employment and housing. Its main focus is on increasing community benefits which may also contribute to this objective.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓?	✓?	✓?	The area lies in a London Plan Area for Regeneration and would provide some new opportunities for local employment and housing. Its main focus is on increasing community benefits which may also contribute to this objective.

18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	✓?	✓?	✓?	The area lies in a London Plan Area for Regeneration and would provide some new opportunities for local employment and housing. Its main focus is on increasing community benefits which may also contribute to this objective.  There is no reference to childcare.
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#### **Conclusions**

The main focus of the policy is to secure enhanced local community benefits from the Oval Stadium: therefore it scores positively on most social objectives, given it lies in a London Plan Area for Regeneration (area of high deprivation). However, more detail on the need for various social infrastructures (e.g. schools, health care etc) would be desirable. The policy scores less well on the environmental sustainability objectives, where there is no mention of issues around climate change (mitigation or adaptation), water conservation or waste management. As the area lies in Flood Zone 3a, the policy should reference flood risk issues and opportunities.

#### **Uncertainties**

- Whether there are current capacity issues with public transport in the area, especially with growth expected in other parts of the Borough/ system;
- any specific needs of equality target groups.

#### **Recommendations/Mitigation**

- reference to Flood Zone 3a and appropriate measures for new build and existing vulnerable uses;
- reference to sustainable design and construction techniques and/or cross reference Policy S11.
- Address school, health, water and transport capacity issues.

Policy PN8 – West Norwood/Tulse Hill SA Objectives		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement	
	Short term	Med term	Long term	SOCIAL		
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	✓?	✓?	✓?	No specific reference to crime or safety, but should be a general benefit through regeneration and public realm improvements. No reference to climate change adaptation.		
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓	✓	✓	The policy would contribute positively to this objective through wider regeneration benefits and specific health service improvements.  Note the supporting text which states:  <i>'The Primary Care Trust has recently opened a new Primary Health Centre within a mixed use development at 214-238 Norwood Road. The PCT is currently exploring with Lambeth Council the potential for redevelopment of Norwood Hall to provide one of its network of Neighbourhood Resource Centres within a new Joint Services Centre. This facility could potentially also incorporate new sport and leisure facilities and meeting spaces to help address the current shortages in the area, particularly for young people.'</i>		
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓✓	✓✓	✓✓	The policy seeks to improve access to a range of services/ facilities, including: <ul style="list-style-type: none"><li>• Retail;</li><li>• Healthcare;</li><li>• Housing;</li><li>• Education;</li><li>• Open space/ public realm;</li><li>• Training;</li><li>• Transport;</li><li>• Jobs;</li><li>• Leisure;</li><li>• 'Joint Services Centre';</li><li>• Youth provision; and</li><li>• Library and theatre.</li></ul>		
4. Provision of essential infrastructure. To	✓?	✓?	✓?	The text refers to a current shortage of primary school places in the area, stating that a new two form entry primary school is required in West Norwood to meet current and projected demand. The policy seeks to		

ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.			'support the development of appropriate sites to meet educational need in the area'.
			Health issues are addressed, as are improvements to the public realm/green space (mostly the cemetery).
			There are some limited transport improvements: the area suffers badly from road congestion, although is fairly well served by radial bus routes.
			Nothing on water or sewerage.
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	✓?	✓?	<p>The area is not in a London Plan Area for Regeneration. However, various aspects of the proposed regeneration will contribute to more equitable outcomes, including:</p> <ul style="list-style-type: none"> <li>• improved healthcare facilities;</li> <li>• employment opportunities</li> <li>• new housing</li> <li>• the regeneration and improvement of existing housing estates;</li> <li>• new educational establishments</li> <li>• training</li> <li>• youth facilities provision.</li> </ul>
6. Housing. Ensuring everyone has the opportunity for an affordable, decent home, quiet enjoyment of that home and the protection of local amenity.	✓?	✓?	<p>The policy provides for mixed use housing and residential led growth, plus the regeneration and improvement of existing housing estates.</p> <p>There is no reference to sustainable design and construction.</p>
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	✓✓	✓✓	<p>The supporting text notes that 'there is concern in some parts of Norwood that a high rate of conversion of family sized houses into flats is changing the character of the area and the balance of communities': however this is not addressed by the policy.</p> <p>Various aspects of the policy will improve the liveability of the area, notably:</p> <ul style="list-style-type: none"> <li>• improvements to the public realm</li> <li>• transport improvements;</li> <li>• mixed use development;</li> <li>• enhanced cultural assets.</li> </ul> <p>The supporting text notes:</p> <p><i>'A master-plan has been prepared for Norwood involving extensive public consultation. This will provide the framework for the co-ordination of the promotion of development and delivery mechanisms for public realm and</i></p>

		<p>other improvements, including those of the council and other public agencies. Government backed Private Finance Initiative schemes as well as other funding streams will be explored for improvements in community assets and facilities. The council will also work in partnership with other service providers, such as the Primary Care Trust, where there is joint responsibility for the provision and enhancement of community assets. The council will also work in partnership with key stakeholders in providing public realm and traffic management enhancements, as well as encouraging local investment and procurement initiatives.</p> <p>A community based Project Bank will be set up comprising of environmental and community facility improvements. This will include schemes that can be implemented to mitigate the impact of development through planning obligations, and can be drawn on when relevant development proposals come forward'.</p>
	<b>ENVIRONMENTAL</b>	The main built heritage features relate to the 'Library and Norwood Hall' area where the policy seeks 'community and cultural intensification with provision of a new leisure centre, Joint Services Centre and youth provision at Norwood Hall; enhancing cultural assets including the library and its theatre, promoting the historic interest and heritage aspects of Norwood cemetery; and supporting public realm enhancements'.
8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	✓	Whilst there are some references to small scale transport improvements, there is acknowledged traffic congestion in the area and poor east-west links.
9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✗	

10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	<b>✓?</b>	<b>✓?</b>	<b>✓?</b>	West Norwood Cemetery has biodiversity value and will be safeguarded.
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	<b>?</b>	<b>?</b>	<b>?</b>	<p>The policy states that planning obligations will be used to secure opportunities for the provision of a CCHP local energy network. This would contribute positively towards this objective.</p> <p>Apart from this, there is nothing in the policy about how new development may assist in tackling climate change, mitigation or adaptation, e.g. policies on new build or retrofitting. Estate refurbishment could offer such retrofitting opportunities.</p> <p>The absence of stronger public transport improvements may also result in increased carbon emissions, if road traffic and east west capacity problems are not addressed.</p>
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	<b>X</b>	<b>X</b>	<b>X</b>	<p>There is nothing in the policy to suggest an improvement to the current picture in terms of water conservation.</p> <p>The area lies outside of the flood plain.</p>
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<b>X</b>	<b>X</b>	<b>X</b>	<p>There is nothing in the policy to suggest an improvement to the current picture in terms of sustainable waste management.</p> <p>Would KIBA1 be suitable for waste management facilities?</p>

14. Air quality. To improve air quality.	<b>XX</b>	<b>XX</b>	<b>XX</b>	There is nothing in the policy to suggest an improvement to the current picture in terms of air quality. Given existing problems with road traffic and east west links, the local air quality may worsen (the whole of the Borough is an Air Quality Management Zone).
			<b>ECONOMIC</b>	
15. Education and skills. To maximise the education and skills levels of the population.	✓	✓	✓	The policy seeks to use planning obligations to provide up skilling opportunities. In addition, appropriate sites for new educational facilities will be sought.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓?	✓?	✓?	The policy seeks to strengthen the existing commercial and employment uses and develop a range of new employment opportunities.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓	✓	✓	The development proposed is on previously developed sites, there will be improvements to the public realm and new job opportunities in the local area.

<p>18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.</p>	<p>✓?</p>	<p>✓?</p>	<p>The policy should have a minor benefit in terms of tackling worklessness, with the creation and strengthening of local job opportunities and mixed use housing development.</p> <p>Whilst educational need will be met, the policy is unclear whether this includes childcare or nursery facilities (although other community facilities are referred to).</p>
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#### **Conclusions**

The policy scores well on a range of social and economic objectives, especially in terms of providing a wide range of community facilities, including meeting educational and training needs. Transport is likely to remain an issue in an area currently suffering heavy congestion and with few significant transport proposals to improve the situation: again, this is likely to have a knock on impact on air quality. Whilst there is mention of the creation of local energy CCHP energy networks – which is very welcome – other aspects of environmental sustainability (sustainable design and construction, water and waste issues, climate change adaptation) are missing. This may result in missed opportunities, e.g. in the construction of new sustainable schools, provision of much needed waste management facilities within the commercial areas or in retrofitting housing estates as part of refurbishment programmes. Again, child care facilities are ignored. Whilst the issue of housing conversions is raised in the supporting text, this is not supported by any policy content.

#### **Uncertainties**

None.

#### **Recommendations/Mitigation**

- It is suggested that the housing core policy (S3) is amended to control house conversions to retain larger family units, where there is an identified need.
- Inclusion of wording around sustainable design and construction and consider retrofittering low carbon solutions as part of estate refurbishment.

Policy PN9 – Herne Hill		What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement		
SA Objectives		Short term	Med term	Long term	SOCIAL		
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	✓	✓	✓	✓	Transport and traffic improvements should increase safety at the busy junction.  There is no reference to climate change adaptation.		
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	✓?	✓?	✓?	✓?	Improvements to the pedestrian environment and public realm should improve health and well-being.  No reference to improved health facilities/ services.		
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	✓?	✓?	✓?	✓?	The policy seeks to safeguard existing uses and encourage the development of the area as a 'small community focused district centre'. The policy will help improve general access through improvements to the public realm and pedestrian environment and access to public transport.  There is no detail about the range of social and physical infrastructure that may be needed or is available.		
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	?	?	?	?	There is no detail about the range of social and physical infrastructure that may be needed to support growth/ development (although the policy does not promote any significant growth).		
5. Equality and diversity. To ensure equitable outcomes for	?	?	?	?	As a small community focussed centre, the improvements referred to should contribute to more equitable outcomes.		

all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	6. Housing. Ensuring everyone has the opportunity for an affordable, decent home, quiet enjoyment of that home and the protection of local amenity.	<b>?</b>	<b>?</b>	<p>Yet there is no detail about the presence, or needs of any equality target groups, and how any needs may be met.</p> <p>The policy does not propose any housing development.</p>
	7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The policy should improve liveability in the area, as it proposes improvements to the public realm, the pedestrian environment and transport. The community appear to be involved in the planning process.</p>
	8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p><b>ENVIRONMENTAL</b></p> <p>The policy seeks to develop and enhance the area's sense of place, and the main historic site is protected and subject to funded improvements (Brockwell Park).</p>

9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	✓?	✓?	✓?	The policy seeks transport improvements to the area. The supporting text states that:
				<p>'Herne Hill has a busy railway station and is at the convergence of a number of important roads and bus routes, providing a convenient opportunity for interchange. However, the centre is split by a railway bridge and busy roads which intersect it, and it is dominated by the presence of traffic. The major issue is the need to improve this road traffic dominated environment and create a sense of place through: junction improvements at the entrance to Brockwell Park; enabling the re-routing of buses; creation of a town square outside of the station; and improvements to connectivity and the public realm to provide a safe and high quality environment for pedestrians and cyclists. Opportunities for improvements to the station will be supported as well as the development potential it and others sites within the centre have for further improvements.'</p> <p>Delivery will involve Transport for London, and Network Rail and partnership working with the London Borough of Southwark. It will also involve a partnership with the local community, which is preparing a community master-plan for the whole of the centre...'</p>
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	0	0	0	The policy does not address biodiversity, but Brockwell Park, the main green space and wildlife habitat is at least protected from development.
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	0	0	0	There is nothing in the policy to suggest any significant improvement to the current picture (mitigation or adaptation): although transport improvements may have slight positive effect.

12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	<b>0</b>	<b>0</b>	<b>0</b>	There is nothing in the policy to suggest any significant improvement to the current picture in terms of water conservation.  The area is not in the floodplain.
13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<b>0</b>	<b>0</b>	<b>0</b>	There is nothing in the policy to suggest any significant improvement to the current picture in terms of sustainable waste management.
14. Air quality. To improve air quality.	✓?	✓?	✓?	Small scale transport and public realm improvements may have a slight benefit in terms of improving local air quality.
				<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	<b>0</b>	<b>0</b>	<b>0</b>	No reference to skills or education.
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓?	✓?	✓?	Safeguarding and encouraging retail uses and other appropriate town centre activities should assist the local economy, but no evidence of improving its social and environmental performance.

<b>Policy PN10 – Local Centres</b>	<b>What is the predicted effect on each SA objective?</b>	<b>Justification for assessment and recommendations for mitigation/ improvement</b>
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	✓? ✓? ✓?	The policy supports minor regeneration measures.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	0 0 0	<p>The policy seeks to retain current retail and related outlets, but would not significantly contribute to tackling worklessness.</p> <p><b>Conclusions</b>            The policy seeks to develop the area as a community focussed district centre, with relatively modest proposals that revolve around improvements to the public realm and transport (including road junction improvements) and maintenance of current retail activities. There is insufficient detail in the policy to enable many of the objectives to be scored positively: many have been left as uncertain, whereas others have been scored negatively as it is unlikely that the policy would make a positive contribution to tackling significant social and environmental issues.</p> <p><b>Uncertainties</b>            See above.</p> <p><b>Recommendations</b>            More detail is required within this policy in relation to the uncertainty and the negative effects identified.</p>

SA Objectives	Short term	Med term	Long term	SOCIAL
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	<b>0?</b>	<b>0?</b>	<b>0?</b>	Not enough information to make a judgement.
2. Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	<b>0?</b>	<b>0?</b>	<b>0?</b>	Not enough information to make a judgement.
3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	<b>✓?</b>	<b>✓?</b>	<b>✓?</b>	The policy should support a range of services and facilities in a range of available locations across the borough.
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	<b>0?</b>	<b>0?</b>	<b>0?</b>	Not enough information to make a judgement.
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty	<b>0?</b>	<b>0?</b>	<b>0?</b>	Not enough information to make a judgement.

and social exclusion.	<b>0?</b>	<b>0?</b>	<b>0?</b>
6. Housing. Ensuring everyone has the opportunity for an affordable, decent home, quiet enjoyment of that home and the protection of local amenity.			Not enough information to make a judgement.
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	<b>0?</b>	<b>0?</b>	Not enough information to make a judgement.

#### **ENVIRONMENTAL**

8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	<b>0?</b>	<b>0?</b>	Not enough information to make a judgement.

9. Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	<b>✓?</b>	<b>✓?</b>	<b>✓?</b>	Support for local centres is likely to reduce people's need to travel further afield to access facilities or services.
10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	<b>0</b>	<b>0</b>	<b>0</b>	
11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	<b>0?</b>	<b>0?</b>	<b>0?</b>	Not enough information to make a judgement, although to the extent that this policy reduces the need to travel – it may assist in reducing transport CO <sub>2</sub> emissions.
12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	<b>0</b>	<b>0</b>	<b>0</b>	

13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<b>0</b>	<b>0</b>	<b>0</b>
14. Air quality. To improve air quality.	<b>0?</b>	<b>0?</b>	<b>0?</b>
			Not enough information to make a judgement, although to the extent that this policy reduces the need to travel - it may assist in reducing transport emissions.
			<b>ECONOMIC</b>
15. Education and skills. To maximise the education and skills levels of the population.	<b>0</b>	<b>0</b>	<b>0</b>
16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	✓	✓	✓
			Support for local centres is likely to benefit the local economy.
17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	<b>0?</b>	<b>0?</b>	<b>0?</b>
			Not enough information to make a judgement.

				Not enough information to make a judgement.
18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	<b>0?</b>	<b>0?</b>	<b>0?</b>	

**Conclusions**  
The policy is aimed as a general catch all for other parts of the borough not addressed by the specific area policies. However, there is insufficient information to make a judgement on many of the objectives. In as much as local centres are supported, then this may contribute to greater local access to a (limited?) number of services and facilities; as such there may be benefits in terms of reducing the need to travel (and knock on benefits for CO<sub>2</sub> emissions and air quality).

**Uncertainties**  
See above.

**Recommendations**  
More detail is required within this policy in relation to the uncertainty and the effects identified.



# Sustainability Appraisal and SEA of London Borough of Lambeth Submission Core Strategy

Sustainability Appraisal Report

Appendix 4 – Council's proposed  
response to the SA findings and  
recommendations

August 2009

August 2009

**London Borough of Lambeth Local Development  
Framework Core Strategy  
Sustainability Appraisal Report**

Response prepared by LB Lambeth

August 2009

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# Introduction

This appendix sets out the Council's proposed response to the findings and recommendations set out in the Sustainability Appraisal.

## SA Recommendations and Responses

Vision and Strategic Objectives	Recommendation	Response
Recommendation R1	The strategic objectives and Core Strategy policy should also target the regeneration of London Plan Areas of Regeneration.	References to London Plan Areas of Regeneration are made in Policy S1(b) and the Vauxhall, Stockwell and Brixton sections.
<b>Policy S1 – Delivering the vision and objectives</b>	Greater specificity on infrastructure provision would be helpful in order to explain what improvements are necessary to enable the planned scale of growth to be delivered.	Noted. Policy S10 on planning obligations and various of the other strategic policies indicate where S106 Agreements will be sought to secure necessary infrastructure.
Recommendation R2	Annex 2 could clarify whether these schemes are in providers' programmes and whether they are funded. There is then the issue of how much growth/development could occur if the uncommitted schemes did not come to fruition.	The Annex aims to address this and identify gaps in programmes of provision and the core strategy will also inform the review by providers of infrastructure programmes.
<b>Policy S2 – Housing</b>	Sustainable waste management in relation to new housing construction and operation will need to be dealt with within the Development Management DPD.	Recommendation noted.
<b>Policy S3 – Economic Development</b>		

Recommendation R5	<p>The policy could be improved by adding reference to seeking high quality public green space in connection with public areas such as in town centres, especially where improvements to the public realm are mentioned and where regeneration is being sought.</p>	<p>This point is addressed in Policy S9 and by references to specific opportunities for town centre improvements within individual policies for places and neighbourhoods.</p>
Recommendation R6	<p>It is recommended that the policy wording is altered to make reference to developing on previously developed land – could a target be set for 100% of new commercial development to be built on previously developed land?</p>	<p>Policy S1 (a) has been amended to include reference to maximising the use of previously developed land.</p> <p>Core Output Indicator BD2 monitors the total amount of employment floor-space on previously developed land, by type. A target for 100% of employment floorspace on previously developed land is set out in Section 6 Delivery and Monitoring.</p>
<b>Policy S4 – Transport</b>		
Recommendation R7	<p>Providing for a network of electric vehicle charging points and the need for development to provide travel plans or transport assessments in accordance with the Transport for London requirements should be included within the Development Management DPD.</p>	<p>Recommendation noted.</p>
Recommendation R8	<p>It is recommended that text is added to the policy to require developers to demonstrate the effects on ecology and biodiversity are in the first instance avoided, or if effects could occur, these are fully mitigated and an overall residual effect of a net biodiversity enhancement is achieved in major developments (including previously</p>	<p>Policy S5(a) deals with this, further detail can be provided in the DM DPD.</p>

	developed land if appropriate).	This cross reference is not considered necessary.
Recommendation R9	The policy or supporting text should cross refer to specific design guidance, tree planting programmes, or other policy documents as appropriate, which set out requirements for developers to contribute to tree planting programmes.	
Recommendation R10	If another document will address access to open space for different users, such as cyclists and Lambeth's main equalities groups, it should be referred to in the policy. If access to open space is not addressed within another document, it should be addressed in this policy.	The words "...and access to ..." have been added to paragraph (c) of the policy.
<b>Policy S6 – Flood Risk</b>		
Recommendation R11	It is recommended that the Development Management DPD includes the avoidance of pollution and the protection of water quality within policy.	Recommendation noted.
<b>Policy S7 – Sustainable Design and Construction</b>		
Recommendation R12	The last paragraph of the policy should mention sustainable waste management, even though sustainable waste management is dealt with strategically in Policy S8 Sustainable Waste Management.	Recommendation accepted.
Recommendation R13	What constitutes a major development needs to be identified within the Core Strategy and/or within the Development Management DPD.	Major development is defined by CLG with different size thresholds for different types of development and is a generally recognised and understood description of the scale of development.
Recommendation R14	<u>Recommendations for the Development Management DPD and supporting SPD</u>  It needs to be ensured that safeguarded existing heat, cooling and power	Recommendation noted. These points will be addressed through the preparation of the Development Management DPD and / or relevant SPD.

	<p>networks are low carbon or carbon neutral and have been subject to an appropriate environmental risk assessment and method statement. Development Management may provide the best mechanism for ensuring this.</p> <p>If it is the case that sustainable development targets will only be set within the Development Management DPD, the DPD should either set out the timeframes for achievement of the mandatory Code for Sustainable Homes or BREEAM Levels for private developers:</p> <p>For example:</p> <table border="0" data-bbox="731 916 842 1338"> <tr> <td>2010 – minimum Code level 3</td> </tr> <tr> <td>2013 – minimum Code level 4</td> </tr> <tr> <td>2016 – minimum Code level 6</td> </tr> </table> <p>Or alternatively, should state that the Code level targets to be achieved are those as set by the Government (in the event that these target dates should change).</p> <p>The policy should state an aspiration for large scale housing developments within the Borough to achieve Code level 4 prior to 2013.</p> <p>Sustainability Assessments should be required for all developments. The thresholds at which a sustainability assessment is required should be stated</p>	2010 – minimum Code level 3	2013 – minimum Code level 4	2016 – minimum Code level 6
2010 – minimum Code level 3				
2013 – minimum Code level 4				
2016 – minimum Code level 6				

	<p>and indication of the level of detail required for different scales of development should be provided. For example, the minimum topics that should be covered could be listed, or it should be a requirement of the policy that the sustainability assessment should be in line with the Mayor's Sustainable Design and Construction SPD and that this should be followed for major developments. Specific guidance for smaller developments will need to be provided as a minimum. This could consist of a sustainability checklist for household and minor developments. This checklist should be aligned with the SA objectives within this report. In addition, the Development Management DPD and the SPD should be in accordance with all of the SA Objectives.</p>	<p>The Development Management DPD and SPD referred to in the policy should require developers to demonstrate that provision has been made for the necessary infrastructure needed for their development to take place and that it will be delivered in pace with development.</p>	<p><b>Policy S8 – Sustainable Waste Management</b></p> <p>Recommendation R15</p> <p>Cross reference is required to another policy or document which sets out what is required in new developments with regard to appropriate waste and recycling storage – will this be in the</p>	<p>A cross-reference is not considered necessary. This will be addressed in the Development Management DPD and / or a relevant SPD.</p>
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Recommendation R16	<p>The policy should make reference to achieving the waste management targets of the London Plan, such as achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and 80% recycling of that waste as aggregates in London by 2020)</p> <p><b>Policy S9 – Quality of the Built Environment</b></p> <p>Recommendation R17</p>	<p>Guidance advises that Core Strategies should cross refer to London Plan policies but not repeat the detail of the policies. A cross-reference to the London Plan waste apportionment is already included in the wording of policy S8.</p> <p>The Development Management DPD should refer to the need to design/ retrofit new/existing buildings to cope with future climates, particularly in relation to impacts other than flooding.</p>	<p>Recommendation noted.</p> <p>The Development Management DPD should encourage public art.</p>
		<p>No mitigation has been identified in order to offset any potential negative effects of this policy. A number of recommendations have been identified to improve the policy and to be taken into consideration in the preparation of the Planning Obligations SPD and in site specific area based SPDs. The recommendations are as follows:</p> <ul style="list-style-type: none"> <li>• If appropriate, the policy could set out the types of services and facilities that contributions will be used for. This will help demonstrate how the developer contributions will be used to</li> </ul>	<p>Recommendation noted. These points will be addressed during the preparation of relevant SPDs.</p>

	<p>address some of the identified sustainability issues within the Borough.</p> <ul style="list-style-type: none"> <li>The policy makes reference to controlling phasing but could make it clearer that facilities and infrastructure would need to be put in place at an appropriate time to meet the needs of new development in order to ensure that there is no time lag between need and delivery of facilities.</li> <li>The SPDs should enable planning obligations to be used to improve environmental conditions in deprived areas and communities.</li> <li>The SPDs should include taking contributions for enhancing the quality and quantity of open space and the public realm and promoting community engagement, such as contributing towards a community co-ordinator in regeneration areas.</li> <li>The SPDs should include taking contributions for enhancing the quality and character of the built and historic environment and the provision of cultural facilities.</li> <li>The SPDs should include taking contributions towards maintaining and enhancing the biodiversity of the Borough to contribute to the BAP and green infrastructure.</li> </ul>
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	<ul style="list-style-type: none"> <li>Consideration should be given to the need for the SPDs to contribute to the retrofitting of existing buildings or energy infrastructure needed to support new development.</li> <li>There could be potential for the SPDs to take contributions towards off-site SUDs for example and this should be considered when the SPD is prepared.</li> <li>There could be potential for the Planning Obligations SPD to take contributions towards sustainable waste management facilities, such as a recycling centre and this should be considered when the SPD is prepared.</li> <li>The Planning Obligations SPD could also support the planting of trees and this should be considered in its preparation.</li> </ul>	
<b>Policy PN1 Waterloo</b>	Recommendation R20	Clarify how the area contributes to the Borough's waste management approach.
<b>Policy PN2 Vauxhall</b>	Recommendation R21	Ensure that water and sewerage infrastructure keeps pace with development.

	negative impacts of flood risk and the need for appropriate improvement measures, particularly in relation to any opportunities offered by development on riparian sites (e.g. improvements to flood defences).	
Recommendation R23	Clarify how the area contributes to the Borough's waste management approach.	The general approach to waste management is covered in Policy S8. Specific sites to be allocated for sustainable waste management will be addressed through the preparation of the Site Allocations DPD.
Recommendation R24	Ensure that water and sewerage infrastructure keeps pace with development.	Policy S1(d) addresses this.
<b>Policy PN3 Brixton</b>		
Recommendation R25	Add policy wording on social and physical infrastructure needed to keep pace with Brixton's development, particularly schools and water/sewerage.	These points are addressed in the strategic policies. The Brixton policy addresses the town centre and specific requirements for new schools and health facilities fall outside the town centre, so it would not be appropriate to mention them in Policy PN3.
Recommendation R26	Clarify One Planet Living principles.	This is explained in the introductory text to the policy.
Recommendation R27	Address climate change adaptation issues, both in the design of new development and in seeking to retrofit existing buildings.	This point is addressed by Policy S7. More specific targets will be set out in the Development Management DPD and detailed guidance will be provided in a Supplementary Planning Document.
Recommendation R28	Seek biodiversity opportunities in the public realm, pocket park developments, where appropriate.	This point is addressed in Policy S9.
<b>Policy PN4 Streatham</b>		
Recommendation R29	Define how built and historic heritage issues will be addressed.	This point is addressed by strategic policy S9. It would not be appropriate to

		add any more detail to the Core Strategy policy. Further detail can be addressed through an area SPD and/or conservation area character appraisals.
Recommendation R30	Define the role sustainable design and construction will play.	This is addressed by strategic policy S7. A cross reference is not necessary as the introduction to the places and neighbourhoods section explains the relationship between the two sets of policies.
<b>Policy PN5 Clapham</b>		
Recommendation R31	Better address public transport capacity issues for existing and future residents/uses.	This is addressed in strategic policy S4.
Recommendation R32	Address sustainable infrastructure issues (water, waste, new build etc).	These issues are addressed by strategic policies S7 and S8.
Recommendation R33	Clarify the issue of school place need.	The issue of school place need does not directly affect the district centre, so it would not be appropriate to include a reference in policy PN5.
Recommendation R34	Address the need to improve social cohesion in such a socio-economically diverse area.	The policy and introductory text now specifically relate to the district centre, not to the wider Clapham area.
<b>Policy PN6 Stockwell</b>	No recommendations.	
<b>Policy PN7 Oval</b>		
Recommendation R35	Refer to Flood Zone 3a and appropriate measures set out for new build and existing vulnerable uses.	This is addressed by strategic policy S6.
Recommendation R36	Refer to sustainable design and construction techniques.	This is addressed by strategic policy S7. A cross reference is not necessary as the introduction to the places and neighbourhoods section explains the relationship between the two sets of policies.
Recommendation R37	Address school, health, water and	These are all addressed by the strategic

	transport capacity issues.	policies.
<b>Policy PN8 West Norwood and Tulse Hill</b>		
Recommendation R38	It is suggested that the housing core policy (S3) is amended to control house conversions to retain larger family units, where there is an identified need.	Policy S3 (e) addresses this point.
Recommendation R39	Include wording around sustainable design and construction and consider retrofitting low carbon solutions as part of estate refurbishment.	This is addressed by Policy S7.
<b>Policy PN9 Herne Hill</b>		
Recommendation R40	More detail is required within this policy in relation to the uncertainty and the negative effects identified.	The council considers that this policy does respond to a number of the SA objectives (for example those relating to access and services, the built and historic environment, transport and travel, liveability and place, and the local economy). Much of the detail is addressed by the strategic policies.
<b>Policy PN10 Local centres</b>		
Recommendation R41	More detail is required within this policy in relation to the uncertainty and the effects identified.	The policy provides a general framework for local centres in the borough. However, the council considers that this policy does respond to a number of the SA objectives (for example those relating to access and services, liveability and place, and the local economy). The council considers that this policy does respond to a number of the SA objectives. Much of the detail is addressed by the strategic policies.



# Sustainability Appraisal and SEA of London Borough of Lambeth Submission Core Strategy

Sustainability Appraisal Report

Appendix 5 Consultation audit

August 2009

August 2009

**London Borough of Lambeth Local Development  
Framework Core Strategy**  
**Sustainability Appraisal Report**

Response prepared by LB Lambeth

August 2009

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# Introduction

This appendix sets out the consultation responses to the SA and how these have been addressed.

Of the 174 written responses received during the consultation on the draft Core Strategy, 39 respondents commented on the Sustainability Appraisal (SA). The majority of these were questionnaire responses.

Comprehensive responses on the SA were also received from four statutory consultees (Natural England, English Heritage, the Environment Agency and Lambeth NHS).

Respondents were asked whether they considered the recommendations of the SA had been adequately addressed. Twenty-three respondents (59%) felt that the recommendations of the SA had been adequately addressed, while twelve either did not know or did not indicate either way. Five respondents felt the recommendations had not been addressed adequately and gave various reasons for this including that further work is needed to assess the impact of Vauxhall/Nine Elms development on local communities and businesses, the Clapham policy does not seem to have addressed how the local public transport capacity issues (overcrowding) are to be overcome, and that although the proposals for Streatham show negative valuing in the appraisal no solutions are provided in the Core Strategy. Concern was also raised that the SA report was too long and overbearing, and that it delivered no clear meaning. However, other respondents felt that the SA reflected a good or excellent approach.

Statutory consultees expressed general support for the content and approach, and made a number of recommendations as to how the SA could be strengthened, for example through further attention to impacts on health and wellbeing, flood risk management, infrastructure and local evidence relating to tall buildings. These detailed comments are summarised and addressed in the table of comments below.

Sustainability Appraisal Report – March 2009		
	Letter author: Graham Saunders, Senior Regional Planning Advisor, LONDON REGION	
	Letter dated: 18th May 2009	
<b>Letter Comments:</b>		<b>Response from SA team:</b>
Thank you for your email dated 27 <sup>th</sup> March 2009 inviting comments on the Strategic Growth Areas Report.	As the Government's adviser on the historic environment we welcome the opportunity to comment on this important document and to ensure that the protection of the historic environment is fully taken into account. On considering the details of the draft Strategy and Sustainability Appraisal Report we have the following comments to make, which also take account of our previous comments on the Core Strategy Issues and Options (April 2008) document as set out in our letter to you dated 13 <sup>th</sup> June 2008.	No action required.
	Details of our comments principally on the draft Core Strategy are set out in the appendix. These essentially focus upon the need for clearer reference to the historic environment in specific policies and the need for clarity on the justification for tall buildings at particular locations.	No action required.
	Once you have considered the points raised then do please contact me with regards to the advice provided.	In the meantime, English Heritage would strongly advise that the Borough's own conservation staff are closely involved throughout the preparation and implementation of the Core Strategy and associated Sustainability Appraisal, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment.
	This opinion is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, have adverse effects on the	No action required.

historic environment.	<p><b>Sustainability Appraisal (SA)</b></p> <p>It is noted that the EH/CABE <i>Tall Buildings Guidance</i> (2007) has been identified as a key document, but it is not clear how the contents of the national guidance have been incorporated into the development of the draft Core Strategy or appraised against the sustainability objectives. For example it is noted that a number of area based studies have been undertaken principally relating to Waterloo and Vauxhall, but there appears to be a lack of a Borough wide study that demonstrates a clear understanding of the character of the Borough the identification of areas appropriate or not appropriate for tall buildings.</p>	<p>Will check baseline data and PPP review for reference</p>
	<p><b>Draft Core Strategy</b></p>	<p>No action required from the SA.</p>
	<p>Pg9 – Delivering and Implementation</p>	<p>No action required from the SA.</p>
	<p>Para1.32 – English Heritage should be identified as a statutory partner. In the case of archaeological matters the Greater London Advisory Archaeology Service should be contacted with regards pre-application and pre-determination stages.</p>	<p>No action required from the SA.</p>

<p>In addition the evidence base should highlight the importance of the wider historic environment, buildings and spaces are of non-designated heritage value, that helps define Lambeth's distinctiveness.</p>	<p><b>Section 5 – Spatial Planning Issues</b></p> <p>B Achieving economic prosperity and opportunity for all Pg27–28 para 5.18-5.21</p> <p>In developing strategies to guide future change it is important to ensure that the economic value generated from an approach of conservation-led regeneration is fully recognised. Many of the areas specifically discussed such as the Vauxhall and Waterloo Opportunity Areas, and Brixton and Streatham town centres are places with significant heritage value, that help define their distinctiveness. Understanding and embracing the heritage qualities of a place can help provide significant economic, social and environmental dividends. The approach of conservation-led regeneration is endorsed by the London Plan (policy 4B.13).</p> <p>C Tackling and adapting to climate change Pg30 para 5.29</p> <p>It is important to ensure that any measures proposed for flood management should take account of the impact such measures may have upon the quality of the wider environment, including the historic environment. This includes careful consideration of mitigation measures in which to introduce sufficient changes that reduce the impact of flooding yet does not compromise the Boroughs historic environment.</p>	<p>No action required from the SA.</p>
<p><b>D Providing essential infrastructure</b></p> <p>Pg31/32 para 5.36</p> <p>In developing improvements in the transport infrastructure of the Borough it is important to ensure that the changes proposed make a positive contribution to the character of the Borough and its streetscapes. This includes seeking opportunities to enhance the Boroughs historic environment and the setting of its heritage assets.</p> <p>Pg32 para 5.39</p> <p>Many of the Borough's existing open spaces are of heritage value. For example some may be registered as parks and gardens of special interest, whilst other open spaces play an integral part of defining the</p>	<p>No action required from the SA.</p>	

character of a designated conservation area or the setting of listed building. This element of the value of open spaces should be recognised and carefully considered as part of the Core Strategy.	No action required from the SA.
<p>F Creating and maintaining attractive, distinctive places Pg35-37 par 5.54-5.56</p> <p>The title of this section could include a reference to the historic environment or Lambeth's heritage as a baseline in which to create and maintain distinctive places. This would then reflect the content of the text that the title refers too.</p>	No action required from the SA.
<p>Para 5.55</p> <p>The Borough's archaeology should also be highlighted as a key asset, which should be protected and interpreted within the built environment.</p>	No action required from the SA.
<p>Para 5.56</p> <p>Mention should be made of the need to protect and enhancement of the Borough's historic environment. At present this key message is not explicitly stated and therefore falls short of the advice provided in PPG15.</p>	No action required from the SA.
<p>Para 5.57</p> <p>It should be recognised that the River Thames and the inter-relationship of the built environment with including its bridges are of heritage value. In many cases many of the features that define the character of the River are heritage assets or are non-designated assets of historic value. This includes the fragile archaeological remains, whether known or yet to be discovered. These facts should be recognised and valued.</p>	No action required from the SA.

	<p>with the Tall Buildings Guidance.</p>	No action required from the SA.
Section 6 – Spatial Vision and Strategic Objectives		
Pg38 Spatial Vision		
4 <sup>th</sup> para – last sentence	The following changes should be made. <i>Although high in density, they will excel in the sustainable design and management of their built environment and public spaces, with a strong focus on liveability, community safety, <u>enhancement of existing historic buildings and spaces</u> and a sense of place.</i>	No action required from the SA.
Pg40 para15-18		
F Creating and maintaining attractive, distinctive places		
We would suggest that the title is amended to reflect our comments on Pg35.		No action required from the SA.
Para16		
	The word 'built' should be deleted, so that the start of the sentence reads as ' <i>Protect and enhances the historic environment, World...</i> '	No action required from the SA.
Section 7- Strategic Policies		
Pg 45 - Policy S2 – Sustainable Neighbourhoods		
point (a)	The first word should be changed to 'optimise' rather than 'maximise' as the word change would reflect more appropriately the need for sensitivity when bring back into use buildings and spaces of heritage value e.g. listed buildings.	No action required from the SA.
point (e)		
	The end of the sentence needs to include the following words ' <i>protection and enhancement</i> ' and ' <i>and spaces</i> ', so it reads as ' <i>...through the retention of trees and protection and enhancement of historic buildings and spaces, and sensitive interpretation of archaeological sites.</i>	No action required from the SA.
Pg54 – Policy S9 – Sustainable Energy Use		
	We would seek to ensure that the significance of the Borough's heritage assets are not undermined by proposals to introduce greater energy efficiency for the built environment. For example there are many cases where the energy efficiency of listed buildings has been improved without compromising its historic and architectural integrity. At present the policy makes no reference to the need for a balanced and sensitive approach to	No action required from the SA.

	<p>these key assets which we believe should be rectified.</p>	No action required from the SA.
Pg56-57 – Policy S12 –Quality of the Built Environment point (b)	<p>The wording needs to be amended so that it covers all heritage assets, the wider historic environment and their settings. The following changes area suggested:</p> <p><i>Protecting and enhancing heritage assets, the wider historic environment and their settings, such as World Heritage Sites, listed buildings, archaeological heritage and their interpretation, the character and appearance of conservation areas and structures on the local list, supported by national policy, management plans and individual conservation area appraisals.</i></p>	No action required from the SA.
point (c)	<p>The wording needs to be amended so that it covers locally important views and the setting of World Heritage Sites. The following changes are suggested:</p> <p><i>Protecting strategic and local views, including those that affect the outstanding universal value of and setting of World Heritage Sites.</i></p>	No action required from the SA.
point (d)	<p>The wording needs to be amended so that it covers the potential effect of tall buildings on the historic environment. The following changes are suggested:</p> <p>First sentence <i>Supporting tall buildings where they are an appropriate development form for the area, particularly where this contributes to area regeneration, local distinctiveness and historic environment, makes the most effective use of land and is consistent with national and London Plan policies.</i></p>	No action required from the SA.
Last sentence	<p><i>The height of buildings should be appropriate to the surrounding townscape and historic context.</i></p>	No action required from the SA.
	<p>Reference is made to Vauxhall and Waterloo Opportunity Areas as being</p>	

<p>appropriate for tall buildings. Where is the borough-wide study to support the identification of those areas as appropriate, and which areas were identified as being not appropriate? EH/CABE <i>Tall Buildings Guidance</i> (paras 2.4 to 2.9) advises on the need for an urban design study to be carried out to help inform the development of planning policy. With regards to the Vauxhall and Waterloo OAPFs, there are several concerns with regards to these documents and their effectiveness in identifying suitable locations for tall buildings. For example the method used for the Waterloo OAPF and reflected in the Waterloo draft SPD appeared weak in that it lacked sufficient detail and justification for the areas considered appropriate for tall buildings (please see our letter dated 5<sup>th</sup> December 2008). Whilst the Vauxhall OA FP is still in draft form and has not been subject to sufficient public consultation for it to be considered as sound evidence. We are aware that a draft SPD for Vauxhall was issued for public comment in October 2008, but as reflected in our comments to this draft we had concerns with regards to the identification and justification of tall buildings (see our letter dated 15<sup>th</sup> December 2008). In addition it appears that both documents have not been undertaken within the wider context of a Borough wide urban design study that analysed appropriate an inappropriate locations for tall buildings.</p> <p>point (f)</p> <p>The wording needs to be amended so that it covers the existing historic context of the public realm. The following changes are suggested:</p> <p><i>Improving the quality of the public realm, ensuring that it is child-friendly, incorporates ecological features, <u>sustains and enhances its historic context, encourages physical activity, is accessible for people with disabilities, and includes safe and attractive pedestrian and cycle routes within and through neighbourhoods, linked to green spaces and public transport nodes and interchanges.</u></i></p>	<p>No action required from the SA.</p>
<p>Pg57 – Policy S13 – Planning Obligations</p> <p>We would urge you to include the historic environment including archaeology as a potential beneficiary of future planning obligations.</p>	<p>No action required from the SA.</p>
<p>Section 8 – Policies for Places and Neighbourhoods</p> <p>Pg59-62 - Waterloo</p> <p>We would draw your attention to our previous letters in response to the</p>	

<p>drafting of the Waterloo OAPF and draft SPD for Waterloo (in connection with the OAPF dated 13<sup>th</sup> August 2004 and 28<sup>th</sup> April 2006, and the draft SPD dated 5<sup>th</sup> December 2008). Concerns raised related to the depth of analysis undertaken in identifying the appropriateness of tall buildings at this location, the consideration given to the impact of tall buildings upon the historic environment, and wider understanding and appreciation of the Borough's heritage assets and wider historic environment in which to inform the areas contextual qualities and its management for change.</p>	<p>Pg61 - Policy PN1 – Waterloo point (c)</p> <p>We are concerned that this point endorses the appropriateness of tall buildings as a 'loose cluster' at Waterloo. We have raised on a number of occasions our concern that there is insufficient evidence to support the appropriateness of this location especially in terms of its potential impact upon the Borough's and beyond heritage assets and wider historic environment. Before endorsing this approach we would urge you to share evidence of the urban design study (as defined by the <i>Tall Buildings Guidance</i>) and to demonstrate that the impact of the proposed 'loose cluster' upon the historic environment has been analysed and given due weight of consideration when drafting this and other relevant policies in the Core Strategy. With regards to the wording of the policy we would seek the following changes.</p>	<p>No action required from the SA.</p>
	<p>However it should be noted that these proposed changes do not imply that we support the current thrust of the policy e.g. appropriate location of tall buildings:</p> <p><i>Promoting and supporting development and uses of an appropriate scale and form to reinforce the distinct identity of the four character areas (Riverside, Railway, Residential and Lower Marsh) respecting strategic and local views, strategic and local contextual considerations including heritage assets and their settings and ensuring that design quality is worthy of a World City. Waterloo Station and the immediately adjoining area has been identified as providing appropriate potential for a loose cluster of tall buildings providing a focal point on the skyline in line with its strategic London-wide role. Development should scale down from the station to the River Thames and be appropriate to its setting, having due</i></p>	<p>No action required from the SA.</p>

	<i>regard to strategic and local views, and its historic environment.</i>	No action required from the SA.
Pg63-66 - Vauxhall Pg64-65 – Policy PN2 - Vauxhall	<p>point (e)</p> <p>The wording needs to be amended so that it covers fully the issue of views and the historic environment. The following changes are suggested:</p> <p><i>Promoting development appropriate to the different characteristics and roles of distinct character areas of Vauxhall – Vauxhall Heart, Albert Embankment and the Riverside; South-East Regeneration Arc; and Vauxhall and Spring Gardens; respecting strategic and local views, local contextual considerations including heritage assets and their settings, building on and protecting existing character and historic environment taking into account amenity and microclimate, and ensuring high quality design. Development and uses should link with the adjoining areas of the London Plan Opportunity Area in the neighbouring borough of Wandsworth and support the overall approach for development in the London Plan Opportunity Area Planning Framework.</i></p>	No action required from the SA.
Pg67-70 – Brixton Pg69-70 – Policy PN3 - Brixton	<p>point (f)</p> <p>We would wish to reiterate our concerns in response to the draft Vauxhall SPD (letter dated 15<sup>th</sup> December 2008). These are that we understand that the main aim for this Quarter is to develop a 'heart' to Vauxhall. However the rationale for a cluster of undefined tall buildings that frame a central public space was not robustly demonstrated. The draft SPD made clear statements in favour of protecting and enhancing the historic environment and key townscape features, but when articulated in the draft SPD, all these important intentions appeared to be secondary considerations against the principle aim of developing a cluster of tall buildings. We are concerned that this issue has not been clearly addressed in the context of this policy and the Core Strategy.</p>	No action required from the SA.

<i>heritage and historic built environment with a specific ...</i>	No action required from the SA.
point (K) We would urge you to include historic environment as a potential beneficiary of the future planning obligations. It is important to recognise that the historic environment is part of the infrastructure of the existing built environment, and that opportunities will exist to direct funds to its enhancement.	No action required from the SA.
Pg71-74 - Streatham Pg73-74 – Policy PN4 - Streatham In general we support the first paragraph in the policy and its reference to sensitivity of the areas heritage assets when developing regeneration proposals. We would encourage you to take this approach a step further forward by placing these assets at the heart of Streatham's regeneration with a strong emphasis upon a conservation-led approach to revitalising and rejuvenating the town centres future.	No action required from the SA.
point (d) The reference to taller landmark buildings raises concerns. Has a robust study been undertaken in line with the <i>Tall Buildings Guidance</i> that provides clarity on the appropriateness of this area for tall buildings? Was there a Borough-wide study which looked at this issue and did it clearly identify areas appropriate and not appropriate for tall buildings? Was this location specifically mentioned as being appropriate? If so where is the evidence? Our concern is the possible impact of promoting taller buildings at this location upon the areas historic context. Without clarity on how this location was decided we would have concerns with regards to its potential impact upon the areas heritage assets (i.e. settings) and the wider historic environment.	No action required from the SA.
Pg75-77 – Clapham Pg76-77 – Policy PN5 – Clapham In general we welcome the policy but for clarity we would include the following amendments to the text - first paragraph, second sentence. <i>It will seek to reinforce its distinctive character associated with the Old Town, its historic heritage, Clapham Common, its historic environment and .....</i>	No action required from the SA.
Pg78-79 – Stockwell	No action required from the SA.

<p>Pg79 – Policy PN6 - Stockwell</p> <p>Reference should be made to Stockwell's heritage assets and its potential as a baseline in which to reinforce its sense of place. The following words should be included.</p> <p><i>The Council will support the role of Stockwell as a district centre with a clear and distinguishable community focus and heart and a clear physical sense of place, supported by its heritage assets. This will be achieved through: safeguarding and encouraging retail uses; encouraging commercial, civic and other employment uses; enhancing its historic environment; developing and enhancing its sense of place by improvement to traffic and environmental conditions for pedestrians; and creating public open spaces and linkages throughout the area, including improvements to housing estates, connections to and within housing estates and measures to reduce carbon emissions and adapt to climate change</i></p>	<p>No action required from the SA.</p>
<p>Pg80-81 – Oval</p> <p>Pg81 – Policy PN7 - Oval</p> <p>point (c)</p> <p>Reference should be made to Kennington Park as a key heritage asset, so the text should be amended to read as follows.</p> <p><i>Supporting and enhancing the heritage quality and attributes of the conservation area, Kennington Park, St Mark's Church and the use of the churchyard for community and town centre uses</i></p>	<p>No action required from the SA.</p>
<p>Pg82-85 – West Norwood/Tulse Hill</p> <p>Pg84-85 – Policy PN8 – West Norwood/Tulse Hill</p> <p>The supporting text identifies West Norwood Cemetery and comments upon is significant heritage value. However the associated policy makes no reference to this or any other heritage assets and the importance they could play in helping to enhance and manage future change. We would suggest a reference to the historic environment as a positive attribute to the future regeneration of these areas is highlighted within the body of the policy.</p>	<p>Pg86-87 – Herne Hill</p> <p>Pg87 – Policy PN9 – Herne Hill</p>

<p>We would urge you to make reference to Herne Hill's heritage assets such as its conservation area within the body of the text. The following words should be included.</p> <p><b>Second sentence</b></p> <p><i>It will support opportunities to further develop and enhance its historic environment and sense of place by improvement of traffic and environmental conditions in partnership with Transport for London....</i></p>	<p>The proposed list of monitoring indicators contains 2 on built heritage assets: this is considered sufficient.</p> <p>We would seek to ensure that the indicators associated with the historic environment are used when monitoring the Core Strategy policies. For example many of the policies make reference to the areas heritage assets or wider historic environment, yet no reference is made in this Section to monitoring how these policies will impact upon these assets. This should be rectified.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #0070C0; color: white; text-align: center; padding: 5px;">Environment Agency</th><th style="background-color: #D9D9D9; color: black; text-align: center; padding: 5px;">Draft Core Strategy and Sustainability Appraisal</th><th style="background-color: #D9D9D9; color: black; text-align: center; padding: 5px;">Letter author: Ms Carly Pannell, Planning Liaison Officer</th><th style="background-color: #D9D9D9; color: black; text-align: center; padding: 5px;">Letter dated: 18th May 2009</th><th style="background-color: black; color: white; text-align: center; padding: 5px;">Response:</th></tr> </thead> <tbody> <tr> <td style="text-align: left; padding: 5px;"><b>Letter Comments:</b></td><td colspan="4" style="padding: 5px;"> <p>Thank you for consulting the Environment Agency on the Lambeth Draft Core Strategy and Sustainability Appraisal, which we received on the 15<sup>th</sup> April.</p> <p>It is good to see how our comments at the Issues and Options stage (in our letter dated 9<sup>th</sup> June 2008, reference SL/2007/101496/CS-01/IS1-L01) have been incorporated into the current draft documents.</p> </td></tr> <tr> <td style="text-align: left; padding: 5px;"><b>Key issue</b></td><td colspan="4" style="padding: 5px;"> <p>Whilst many of our comments have been incorporated into the Submission draft SA report informed by SFR A and takes on board its findings. No further action proposed.</p> </td></tr> </tbody> </table>	Environment Agency	Draft Core Strategy and Sustainability Appraisal	Letter author: Ms Carly Pannell, Planning Liaison Officer	Letter dated: 18th May 2009	Response:	<b>Letter Comments:</b>	<p>Thank you for consulting the Environment Agency on the Lambeth Draft Core Strategy and Sustainability Appraisal, which we received on the 15<sup>th</sup> April.</p> <p>It is good to see how our comments at the Issues and Options stage (in our letter dated 9<sup>th</sup> June 2008, reference SL/2007/101496/CS-01/IS1-L01) have been incorporated into the current draft documents.</p>				<b>Key issue</b>	<p>Whilst many of our comments have been incorporated into the Submission draft SA report informed by SFR A and takes on board its findings. No further action proposed.</p>			
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<p>current draft, flood risk management remains our key issue. In particular the use of the Strategic Flood Risk Assessment (SFRA) to inform the Core Strategy and Sustainability Appraisal, and we have detailed our concerns in the following sections.</p> <p>In addition we have also provided further comment within our remit on the following:</p> <ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Recreation and Navigation</li> <li>• Protection of Groundwater</li> </ul>	<p><b>Flood Risk Management</b></p> <p>The Environment Agency welcomes both Policy S8 and sustainability appraisal objective 12 that encompasses flood risk. Furthermore, climate change and spatial planning policies are closely tied in with flood risk management, and other forms of flooding have also been incorporated within flood risk management.</p> <p>The Core Strategy also gives mention to the Thames Catchment Flood Management Plans and we are wholly supportive of policies that cover Green and Sustainable Infrastructure.</p> <p>However, we are concerned that the Core Strategy and Sustainability Appraisal both fail to refer to the London Borough of Lambeth's Strategic Flood Risk Assessment (SFRA). The information contained within the SFRA should be used as baseline evidence for the Sustainability Appraisal and informing the Core Strategy. It will enable you to apply the Sequential Test for development in high flood risk areas. Since the borough has significant proportion in flood zone, this is a key issue. This is in line with the requirements set out in Annex E of Planning Policy Statement 25 (PPS25).</p>	<p>No action required from the SA.</p> <p>Submission draft SA report informed by SFRA and takes on board its findings. No further action proposed.</p> <p>The draft SFRA provides many recommendations that should be included within Policy S8 could also inform local area policies and other spatial policies. We refer you in particular to section 8.2 which includes specific London Borough of Lambeth recommendations. These recommendations should inform what is included within the Lambeth Core Strategy and at</p> <p>Submission draft SA report informed by SFRA and takes on board its findings. No further action proposed.</p>
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<p>present there is some useful information contained that has been under-utilised thus far.</p> <p><u>Whilst Policy S8-Water Resources and Flood Risk Management refers to the exception test, the sequential test must be passed in the first instance, before the exception test is applied. Section 4 of the SFRA provides a suggested flow chart for the application of the Sequential Test, and it is essential that Lambeth Council develops a strategy for its implementation to ensure proposals comply with PPS25. Please note the Environment Agency will object to major planning applications in Flood Zone 2 and 3 that are not accompanied by a sequential test.</u></p> <p>Finally, any new development in high risk areas should contribute positively to actively reduce flood risk in line with PPS25, through the hierarchical order: avoid, reduce, manage, mitigation. We would strongly support a re-worded policy that emphasises the need to avoid or reduce flood risk before consideration is given to mitigate and manage flood risk.</p>	<p>Comment relates directly to the Core Strategy. No action required from the SA.</p>
<p>We are please to see our comments have been incorporated from previous correspondence. In particular, reference has been made to the Thames foreshore within Policy S7, green infrastructure and urban greening policy.</p> <p>The River Thames has also been include in the overall vision of the Core Strategy, and this ensures the Core Strategy remains locally focused and distinctive.</p>	<p>No action required from the SA.</p>
<h3>Recreation and Navigation</h3>	
	<p>We welcome your acknowledgement of the need for open space by the River Thames to accommodate the fast growing use of the River Thames as a "backdrop" for national events. The Embankment and the status of the Thames Path National Trail are the initial security for these interests but we are pleased to see further commitment by the creation of the River Thames Policy Area for the enhancing of the public realm and links from the River Thames into the wider area of the London Borough of Lambeth.</p>

Links from the river into the Borough may also be a way of positioning tall buildings well back from the river corridor which is something we would encourage.	The Environment Agency wishes to encourage the introduction of facilities for visitor moorings. We would also encourage a presumption against a piecemeal introduction of residential use on the River Thames in central London. To recognise a priority for the leisure and 'touristic' values of river transport and the need for facilities and infrastructure that will support those activities. The 'South Bank' is clearly a lead example for such connectivity with the river. Your strategy may explore further river locations that can benefit from that example.	Comment relates directly to the Core Strategy. No action required from the SA.
		Protection of groundwater
	We welcome the inclusion of Policy S10- Sustainable Waste Management within the Core Strategy.	Comment relates directly to the Core Strategy. No action required from the SA.

We would, however, encourage the introduction of a policy that encourages the use of sustainable remediation techniques when dealing with land contamination. Given the increased pressures on landfill as well as increasing costs, we would encourage the promotion of in-situ remediation technologies wherever appropriate. Alternatively, the use of centrally located facilities to accept and treat waste from sites affected by contamination could provide a more sustainable solution to disposal to landfill. This would also have an additional benefit of a reduction in carbon emissions associated with transportation of waste materials to a suitable landfill site.

Within the Sustainability Appraisal, we do not agree with the appraisal of Policy S8 (Water Resources and Flood Management) and Policy 9 (Sustainable Energy Use) against Sustainability Appraisal Objective 12 (water resources and flood risk management). Assessment of Policy S8 against SA 12 mentions that this policy will have a 'limited influence on water quality'. This is somewhat untrue, however, as SUDS can significantly enhance the quality of surface water through processes such as filtration, settlement and adsorption as the water travels through the system. Whilst the use of infiltration type SUDS may

<p>be constrained where land contamination is an issue, this should not prevent their use if the systems are appropriately designed. Appropriate treatment measures should also be in place should the surface water have the potential to contain contaminants e.g. in car parking areas or vehicle refuelling sites.</p>	<p>Furthermore, the assessment of Policy S9 against SA 12 does not recognise the potential hazard associated with the use of penetrative systems to provide heating/cooling for new developments. There is potential for a negative impact on water quality through the chemicals that are used within the systems as well as the heat that may be introduced into the ground which can be considered a pollutant. According to Policy P10-2 in our Groundwater protection: Policy &amp; Practice (GP3, 2008), we recommend developers undertake appropriate prior investigations for these systems which should include appropriate environmental risk assessment and method statement. A further concern is the risk of creating preferential pathways for contaminants to enter the underlying chalk aquifer should penetrative methods be used. The risks associated with the use of these types of systems should be reflected in the Sustainability Appraisal.</p>	<p>New policy S7 on sustainable design and construction revised and makes no reference to such penetrative systems. No action required.</p>
<p><b>Natural England</b> Public Consultation: Lambeth Local Development Framework Draft Core Strategy</p> <p>Letter author: David Hammond, Planning and Advocacy Adviser, Natural England London Region</p> <p>Letter dated: 19th May 2009</p> <p><b>Letter Comments:</b></p> <p>Thank you for your letter and consultation dated 3<sup>rd</sup> April 2009, requesting Natural England's views and comments on the above Consultation Document. Your consultation has been passed to me as a member of the Future London Team for response.</p> <p>Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations.</p>	<p><b>Response:</b></p> <p>No action required from the SA.</p>	

<b>Draft Core Strategy</b>	The introduction provides clear links to Lambeth's Sustainable Community Strategy together with relevant National Legislation, appropriate Partners have also been identified under the Delivery and Implementation section and this is welcomed and commended.	Comment relates directly to the Core Strategy. No action required from the SA.
<b>Section 2: Evidence Base</b>	Identifies that Lambeth currently has 1.54 hectares of unrestricted open space per 1,000 head of population, whilst recognising areas of deficiency. This can be used as a base for monitoring through the Annual Monitoring Report, no loss of this level of provision, together with any increases in levels of provision per 1,000 head of population.	Comment relates directly to the Core Strategy. Indicator included in SA monitoring indicators. No action needed.
<b>Section 3: Consultation and Engagement Links to the Statement of Community Involvement</b>	Paragraph 3.4 refers and the overall approach is acceptable and appropriate.	No action required from the SA.
<b>Section 4: Sustainability Appraisal</b>	This section sets out the purpose and clarifies the Sustainability Appraisal, which is further explained in the accompanying Sustainability Document itself – this will be commented upon later.	No action required from the SA.
<b>Section 5: Spatial Planning Issues</b>		No action required from the SA.
<b>Accommodation</b>	No formal comment	
<b>Economic Prosperity</b>	Natural England welcomes the Council's recognition of the issues surrounding public transport capacity in opportunity areas such as Waterloo and Vauxhall, and is pleased to see its consideration by the Council.	No action required from the SA.
<b>Tackling and Adapting to Climate Change</b>	Promotion and awareness of walking, cycling and public transport options under this heading is welcomed.	No action required from the SA.

Paragraph 5.28 refers to Biodiversity and recognises its role in alleviating Climate Change, combating Heat Island Effects. Using schemes and policies to safeguard and enhance Lambeth's wildlife habitats and improve its natural environment would be welcomed and supported by Natural England.	No action required from the SA.
Under paragraph 5.30 the inclusion of Sustainable Urban Drainage (SUD's) together with 'Urban Greening' through brown and green roofs as well as living walls is also welcomed and supported.	No action required from the SA.
<b>Providing Essential Infrastructure</b> Paragraph 5.34 refers to Green Infrastructure and its inclusion in this section is welcomed and supported.	No action required from the SA.
The pressure of new developments on the public transport systems and open space provision is acknowledged, paragraph 5.35 refers.	No action required from the SA.
Under paragraph 5.39 there is reference to the levels of open space provision within the Borough and the recognition that there are areas of deficiencies, and the Council's commitment and aspirations to seek wherever possible, new open spaces, together with the safeguarding and improvement to the quality of existing open space is to be commended, encouraged and supported.	No action required from the SA.
<b>Promoting Community Cohesion</b> Paragraph 5.48 recognises areas of deficiency in the provision of Community facilities, including Parks and Open Spaces which is acknowledged.	No action required from the SA.
<b>Creating and Maintaining Attractive Distinctive Places</b> The recognition that Open Spaces can contribute positively to attractive and distinctive places is welcomed, as referenced under paragraph 5.55.	No action required from the SA.
The River Thames is mentioned under paragraph 5.57 and Natural England welcomes the recognition of the Thames Path National Trail. Developments along the River have the potential to impact and ameliorate affects on this Nationally Designated Walking Trail and the Council will need to take this in to consideration in respect of applications and developments within this area. Natural England recommends that contact	No action required from the SA.

<p>is made with the Trails officer as detailed below in respect of any developments within this area, with potential to affect impact or provide amelioration on the Thames Path. Alexandra Rook is the contact point and she can be contacted at the following e-mail address:</p> <p><a href="mailto:Alexandra.rook@walklondon.org.uk">Alexandra.rook@walklondon.org.uk</a></p>	<p>No action required from the SA.</p>
<p><b>Section 6: Spatial Vision and Strategic Objectives</b></p> <p>The Council has set six key overarching issues/themes to which there are eighteen (18) objectives attached in total, all of which can be broadly supported, and in particular the following:</p> <ul style="list-style-type: none"> <li>4) Reduce carbon emissions by minimising the need to travel and maximising energy efficiency and renewable generation in building and area regeneration schemes.</li> <li>5) Safeguard and increase biodiversity through co-ordinated implementation of the Lambeth Biodiversity Action Plan.</li> <li>6) Enable Lambeth to adapt to the effects of Climate Change, including drought and flood risk, through the design of the built environment, retention of existing trees, urban greening and sustainable urban drainage.</li> <li>7) Provide the essential physical, social and green infrastructure to support population and economic growth through co-ordinated delivery of infrastructure programmes by Lambeth First Partners and Statutory Undertakers.</li> <li>8) Work in partnership with Government, Transport for London, Network Rail and major developers to increase public transport capacity and accessibility, reduce reliance on the private car, promote walking and cycling and provide alternatives to road based freight transport.</li> <li>9) Increase the quantity and quality of Open Space in Lambeth by safeguarding, linking and upgrading existing open space, improving access, seeking new open space wherever possible, retaining existing trees and supporting the delivery of the Open Spaces Strategy.</li> </ul>	

<b><u>Section 7: Strategic Policies</u></b>	No action required from the SA.
<u>Policy S1 – Delivering the Vision and Objectives</u> This policy is welcomed and supported especially in relation to Section (d) which refers to 'Green and Social infrastructure'.	No action required from the SA.
<u>Policy S2 – Sustainable Neighbourhoods</u> Reference is made to Climate Change Adaptation and Mitigation – section (i) which is supported.	No action required from the SA.
<u>Policy S3 - Housing</u> No formal comments.	No action required from the SA.
<u>Policy S4 - Economic Development</u> No formal comments.	No action required from the SA.
<u>Policy S5 – Transport</u> Promotion of walking, cycling, car clubs, car free developments and sustainable public transport options is to be welcomed, encouraged and supported.	No action required from the SA.
<u>Policy S6 – Social Infrastructure</u> No formal comments.	No action required from the SA.
<u>Policy S7 – Green Infrastructure and Urban Greening</u> Section (a) refers to the Thames Path, improved access to, biodiversity and ecological potential for the Borough all of which are to be welcomed and supported.	No action required from the SA.
<u>Policy S8 – Water resources and Flood Risk Management</u> Water recycling * grey water) and SUD's provisions are welcomed and supported.	No action required from the SA.
<u>Policy S8 – Water resources and Flood Risk Management</u> Water recycling * grey water) and SUD's provisions are welcomed and supported.	No action required from the SA.
<u>Policy S10 – Sustainable Waste Management</u> No formal comments.	No action required from the SA.
<u>Policy S11 – Sustainable Design and Construction</u> No formal comments.	No action required from the SA.

<u>Policy S 12 – Quality of the Built Environment</u>	Inclusion of references to improving the Thames Path, ecological features and sustainable travel options are recommended and supported.	No action required from the SA.
<u>Policy S 13 – Planning Obligations</u>	Inclusion of Open Spaces, sustainable transport options is welcomed and supported. -	No action required from the SA.
<b><u>Section 8: Policies and Places for Neighbourhoods</u></b>		No action required from the SA.
<u>Waterloo – Policy PN 1</u>	Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<u>Vauxhall – Policy PN 2</u>	Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<u>Brixton – Policy PN 3</u>	Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<u>Streatham – Policy PN 4</u>	Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<u>Clapham – Policy PN 5</u>	Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<u>Stockwell Policy – PN 6</u>	Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<u>Oval – Policy PN 7</u>	Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<u>West Norwood/Tulse Hill – Policy PN 8</u>	Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.

	No action required from the SA.
<u>Herne Hill – Policy PN 9</u> Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<u>Other Centres – Policy PN 10</u> Natural England acknowledges this Policy and will comment as Plans and applications for comment are submitted.	No action required from the SA.
<b>Section 9: Monitoring</b>	See comments below:
The use of the Annual Monitoring Report is appropriate and in line with relevant guidance. In respect of targets for monitoring the Council may wish to consider the following:	Indicator now added to monitoring table.
The numbers of “Green Travel Plans” submitted for large/major developments – Council to determine level of large/major development.	Not considered appropriate as monitoring indicator.
Take up and membership of Car Clubs	Not considered appropriate as monitoring indicator.
Numbers of schemes with living roofs (green/brown roofs) and percentage increase in biodiversity/ecological potential for the Borough.	Not considered appropriate as monitoring indicator.
Percentage or numbers of open spaces fully accessible within the Borough.	Not considered appropriate as monitoring indicator.
Numbers of Green/Open Spaces with agreed management plans in place.	Not considered appropriate as monitoring indicator.
<b>Habitats Regulations Assessment</b>	No action required from the SA.
The approach and methodology used by the Council is appropriate and in line with relevant guidance as well as similar to other London Borough's.	No action required from the SA.
Natural England agrees with the Conclusions reached in paragraph 7.1 of this document, that in this instance an Appropriate Assessment is not required to be carried out in respect of the Draft Core Strategy.	No action required from the SA.
<b>Sustainability Appraisal</b>	No action required from the SA.
The Sustainability Appraisal objectives listed under Social, Environment and Economic headings can all be broadly supported, and in particular the following objectives are supported: Objectives 8, 9, 10 and 11.	No action required – key issues do include environmental issues.
<b>Key Sustainability Issues</b>	

This section appears to make no reference to Environmental issues, covering employment, commercial and transport areas. This needs to be clarified.	
<u>Sustainability Objectives</u>	No action required from the SA.
As stated above the sustainability issues listed are broadly supported, and in particular the following: Objectives 8, 9, 10 and 11.	No action required from the SA.
The above are specific comments related to the Draft Core Strategy as submitted; the Council may find the following information of general use in determining measures to enhance the natural environment of the Borough, as well as in dealing with individual planning applications, in accordance with the planning guidance referenced below.  <u>Biodiversity</u>	No action required from the SA.
Paragraph 14 of PPS9: Biodiversity and Geological Conservation states that “ <i>Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, local planning authorities should maximise such opportunities in and around developments, using planning obligations where appropriate.</i> ”	Comment relates directly to the Core Strategy. No action required from the SA.
As stated in London Plan Policy 3D.14, “ <i>The planning of new development and regeneration should have regard to nature conservation and biodiversity, and opportunities should be taken to achieve positive gains for conservation through the form and design of development. Where appropriate, measures may include creating, enhancing and managing wildlife habitat and natural landscape and improving access to nature.</i> ”	Comment relates directly to the Core Strategy. No action required from the SA.
<u>Access to Nature</u>	Comment relates directly to the Core Strategy. No action required from the SA.
As highlighted in PPG17: Planning for open space, sport and recreation, “ <i>In planning for new open spaces and in assessing planning applications for development, local authorities should seek opportunities to improve the local open space network, to create public open space from vacant land, and to incorporate open space within new development on</i>	

<p><i>previously used land. They should also consider whether use can be made of land which is otherwise unsuitable for development, or procure public use of privately owned areas of land or sports facilities.”</i></p> <p>Additionally, as outlined in Policy 3D.14 of the London Plan, your Council should be aiming to improve people’s access to nature, and priority should be given to sites within or near to areas deficient in accessible wildlife sites.</p>	<p><b>Climate Change Adaptation</b></p> <p>It is important that, in line with ‘Planning Policy Statement: Planning and Climate Change’, your Council takes account of the contribution to be made from existing and new opportunities for green infrastructure to urban cooling, sustainable drainage systems, and conserving and enhancing biodiversity.</p>	<p>Policy 4A.9 of the London Plan also states that “<i>The Mayor will, and other agencies should, promote and support the most effective adaptation to climate change, including protecting and enhancing green infrastructure.</i>”</p> <p>There are a number of resources available to assist you and developers when considering the implications of development proposals on the natural environment in Greater London. For further information please refer to:</p> <ul style="list-style-type: none"> <li>Design for Biodiversity <a href="http://www.d4b.org.uk/">http://www.d4b.org.uk/</a></li> <li>Biodiversity by Design <a href="http://naturalengland.com/unissons.com/naturalenglandshop/docs/TCP1.pdf">http://naturalengland.com/unissons.com/naturalenglandshop/docs/TCP1.pdf</a></li> <li>Improving Londoner’s Access to Nature <a href="http://www.london.gov.uk/mayor/planning/docs/access-to-nature.pdf">http://www.london.gov.uk/mayor/planning/docs/access-to-nature.pdf</a></li> <li>Right Trees for a Changing Climate <a href="http://www.right-trees.org.uk/">http://www.right-trees.org.uk/</a></li> <li>Adapting to Climate Change: A Checklist for Development <a href="http://www.london.gov.uk/lccp/publications/development.jsp">http://www.london.gov.uk/lccp/publications/development.jsp</a></li> <li>The London Rivers Action Plan <a href="http://www.therrc.co.uk/lrap.php">http://www.therrc.co.uk/lrap.php</a></li> </ul>
		<p>Comment relates directly to the Core Strategy. No action required from the SA.</p>

Biodiversity and the Built Environment: A report by the UK-GBC Task Group <a href="http://www.ukgbc.org/site/news/showNewsDetails?id=139">http://www.ukgbc.org/site/news/showNewsDetails?id=139</a>	Monitoring the natural environment  To ensure that your Council's planning decisions are based on the best available evidence on the natural environment your Council should give consideration to entering into an agreement with Greenspace Information for Greater London (GIGL) for the provision of a variety of natural environment and greenspace datasets. This is information essential for making effective planning decisions and for ensuring compliance with planning guidance. You can contact GIGL at: <a href="mailto:enquiries@qigl.org.uk">enquiries@qigl.org.uk</a>	Comment relates directly to the Core Strategy. No action required from the SA.
	I hope that this makes Natural England's position clear but if you have any further questions about this letter or require further information please do not hesitate to contact me.	No action required from the SA.
	<b>NHS Lambeth – Planning Policy Team</b>  Comments on Sustainability Appraisal and SEA of London borough of Lambeth LDF Core strategy  Letter author: Julian Alexander, Head of Estates Management  Letter dated: 21 <sup>st</sup> May 2009	<b>Response:</b>  No action required from the SA.
<b>Letter Comments:</b>  Further to my letter dated 18 <sup>th</sup> May 2009, formally responding to the LDF Core Strategy consultation, I write giving the following comments on behalf of NHS Lambeth to the Sustainability Appraisal of the draft Core Strategy consultation:		<b>Response:</b>  No action required from the SA.
<b>What is sustainability appraisal?</b>  This considers the social, economic and environmental implications of policies and how they are addressed in the core strategy which is the basis for the development of Lambeth Development Plan. It also includes a sustainable appraisal of the core strategy vision and strategic objectives. It was conducted by an external provider.		No action required from the SA.
<b>Which paper was “sustainability appraised”?</b>  Core Strategy which supports the Lambeth Local Development Framework		No action required from the SA.

<b>How much is Health and Well-being considered?</b>	The sustainability appraisal framework includes "Health and Well-being (see page iv) and also access and services. It assessed the vision and strategic objectives and various specific policies (sustainable neighbourhood, housing, economic development, transport, social infrastructure, green infrastructure, urban greening, water resource and flood risk management, sustainable energy use, waste management, design & construction, built environment, planning obligations.	No action required from the SA.
<b>What are the key findings in relation to health?</b>	The appraisal considers wider determinants to health in various areas: - environmental issues including water & sanitation, climate change, biodiversity, open space, waste and air quality - energy use including fuel poverty - social needs such as housing, infrastructure (transport)	No action required from the SA.
Predicted effect of LDF on health and well being in short, medium and long term are assed to be positive ( (see London Borough of Lambeth Local Development Framework Core strategy – Sustainability report) referring to actions addressing wider determinants (housing, safety, employment opportunities, active travel). The vision and strategic objectives of core strategy suggest a focus on neighbourhood "creating healthy neighbourhood", improving access to health and social services and encourage healthy lifestyle in design of built environment. . Key wider determinants addressed: housing, safety, employment opportunities and active travel.	No action required from the SA.	
Issues of unequal opportunities are mentioned in an ad hoc way (for example in relation to transport but not housing. There is a reference to the "determinants of health" Dahlgren and Whitehead 1991 diagram. The consequence of an ageing population is mentioned for transport but did not seem to be systematically appraised.	No action required from the SA.	
Impact of poverty is mentioned for children ("poor health and nutrition") (see page 49 annexe 20).	No action required from the SA.	
Local based data are mainly reported in the section on "Equality and diversity" (page 4-8).	No action required from the SA.	
<b>What are the gaps?</b> This is considered in relation to identifying and addressing the health and	No action required from the SA.	

well being impact of the planned development plans in Lambeth	<p><b>Overall gaps:</b></p> <ul style="list-style-type: none"> <li>- a clear and systematic identification of health and well being consequences of accelerated urban development</li> <li>- a systematic review of the impact of increased birth rate - there is mentioned of the implications for schooling but not for health services (p56) ( Objective of core strategy mentions "improving access to health and social care services...but not clear if the extra demand associated with increased population is specifically mentioned)</li> <li>- Few local data...mainly used London based data</li> </ul> <p><b>Gaps in relation to Health and well being:</b></p> <ul style="list-style-type: none"> <li>- not clear if capacity of health services has been considered in the perspective of growing population</li> <li>- reference to the impact of deprivation on health outcomes, unhealthy lifestyles, the high prevalence of mental health needs</li> <li>- p 70 it mentioned "accident and unintentional injuries as the third main causes of premature mortality" : this is not the case (the third cause after CVD and cancer is respiratory deaths below 75 years when comparing Lambeth to England</li> <li>- infant mortality data (p 71) needs updating: "Infant mortality (deaths of infants aged under 1 year) has dropped from 8.8 per 1000 live births in 1995-97 to 5.8 per 1000 live births in 2004-06 which is an absolute reduction of over 26%; however there is still a gap when compared to the London rate as seen in the graph below. (relative gap 18% compared to England )</li> </ul>	<p>It is considered that the consideration of health and well being at this strategic level of appraisal has been sufficient and has had reference to the sustainability issues identified.</p> <p>There will not be another round of appraisal of the Core Strategy before it is submitted. Comments related to baseline data will be taken on board in the update of baseline data as a part of the next SA of an LDF document that the Council undertakes.</p>	<p>It is considered that the SA has dealt with provision of health infrastructure adequately. Demand for health services needs to be considered in detail by Lambeth Council and Lambeth NHS and delivered through developer contributions which is stated within Policy S10 – Planning Obligations.</p> <p>There will not be another round of appraisal of the Core Strategy before it is submitted. Comments relating to baseline data will be taken on board in the update of baseline data as a part of the next SA of an LDF document that the Council undertakes.</p>	<p><b>Mental well being addressed by SD objective 2, health.</b></p> <p>Binge drinking is a national cultural issue which it is considered the Core Strategy has limited control over. This is an issue to consider in the next SA of LDF documents and should be particularly considered in any AAP or subsequent locational policies. The risk of obesity may not be considered a reasonable</p> <p><b>Other issues:</b></p> <ul style="list-style-type: none"> <li>- in relation to economic development, while deprivation and worklessness are raised as an issue, there is no discussion of the impact on health and well being including mental health. While the assessment acknowledge that regeneration of town centres will be positive for social inter-action, it does not raise the link of some economic activities such as night economy which is associated with binge drinking ; or the multiplication of take away which is a risk factor</li> </ul>
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for obesity	justification for planning in relation to takeaway food outlets (making provision for or otherwise).
- in relation to infrastructure: identify lack of provision for Brixton	There will not be another round of appraisal of the Core Strategy before it is submitted. This comment should be addressed in the Core Strategy rather than the SA. SA makes reference to this issue, e.g. need for additional school places.
- In relation to water no mention of the need to remove lead water pipes, may there is none but it needs to be checked	This has not been identified in the baseline data as an issue. The Environment Agency has also not mentioned issues regarding lead pipes in correspondence.
- Flooding threat mentioned but it is not clear what could be the impact on health ( for example flooding can affect sewage which then could be a public health hazard)	There will not be another round of appraisal of the Core Strategy before it is submitted. This comment should be taken on board in the SA of the Development Control Policies DPD.
Climate change is mentioned in detail. However there is very little about the potential impact on health. We could mention the work being done on understanding seasonal excess deaths and addressing (preventing and minimising, preparedness plan) the vulnerability to extreme weather conditions and this could be integrated with the recommendation “implement measures to help Lambeth adapt to the consequences of inevitable climate change	It is considered that the associated risks of flooding and those who are most vulnerable to flooding has been adequately addressed in the SA. There will not be another round of appraisal of the Core Strategy before it is submitted. The connection between sewage and flooding could be emphasised in the next SA of LDF documents.
- Air pollution is mentioned but not noise pollution. Impact on health is briefly described but little is said about who is most vulnerable to the air pollution. Also there is a recommendation to ensure that community facilities are located near public transport nodes....which would make people more exposed to air pollution. There is a need to	There will not be another round of appraisal of the Core Strategy before it is submitted. These comments in relation to climate change and impacts on health is useful and should be taken on board within the SA of other LDF DPDs, in particular the Development Control Policies DPD.
	Noise issues are considered within the appraisal matrices, particularly in relation to disturbance. The connection between noise and health and vulnerability to air pollution should be considered within the SA of the next LDF DPDs.

plan a buffer zone for community facilities.	<p>We would not agree that there is a need to plan a buffer zone around community facilities. The Core Strategy aims to reduce air quality issues through spatial planning.</p> <ul style="list-style-type: none"> <li>- Mentioned fuel poverty but no reference to the health / well being impact of it and who is more likely to be in that situation</li> </ul>	<p>It is not considered necessary that the SA requires amendment in response to this comment.</p> <p>These comments have been noted and should be taken into account in the development of the Development Control Policies DPD.</p>
	<ul style="list-style-type: none"> <li>- Housing: mentioned of the high risk of people living in overcrowded accommodation however does not seem to link the proposal of "mix housing size" to the differential requirement in the population. There is no mention of the direct health impact of the housing on health: for example Poor design or construction of homes can cause many accidents. Indoor pollutants or mould cause asthma, allergies or respiratory diseases. Use of the proper building materials and construction might prevent these diseases. Appropriate design can prevent both exposure and the risk to health. Thermal comfort and energy as well as residential environments are known to impact on health and well being.</li> </ul>	<p>The Core Strategy makes provision for an ageing population through the requirement for all new homes to be built to Lifetime Homes standards.</p> <p>The need to amend the SA Framework for use in the next SA that the Council undertakes will be considered. There will not be another round of sustainability appraisal of the Core Strategy before it is submitted.</p>
	<ul style="list-style-type: none"> <li>- There is also a need to consider the consequences of an ageing population on various aspect of development including housing. The needs of older people are outlined in the older people strategy "Positive Ageing – an older people's strategy for Lambeth</li> </ul>	<p>There will not be another round of appraisal of the Core Strategy before it is submitted. These comments related to baseline data will be taken on board in the update of baseline data as a part of the next SA of an LDF document that the Council undertakes.</p>
	<ul style="list-style-type: none"> <li>- P50: in relation to equality, they could mention that NHS Lambeth has "Single equality equity scheme". There is no mention of east European or south American as part of BME...also in term of vulnerability, people of mixed heritage should be mentioned</li> <li>- In relation to Waterloo: no mention of the health issues associated with tourism will need to be identified</li> </ul>	<p>This issue could be investigated in the next SA of an LDF document however, further consultation is needed with Lambeth NHS to identify what such issues may be.</p>

<ul style="list-style-type: none"> <li>- In relation to Brixton: no mention of specific health needs associated with business and night economy. also no mention making living cost accessible to local population</li> </ul>	<p>It is considered that the SA has dealt with health infrastructure adequately. Demand for health services needs to be considered in detail by Lambeth Council and Lambeth NHS and delivered through developer contributions which is stated within Policy S10 – Planning Obligations.</p>
<p>Living cost is a national issue which the Core Strategy has little influence over other than through the provision of Affordable Housing and access to public transport.</p> <p>Binge drinking is a national cultural issue which it is considered the Core Strategy has limited control over. This is an issue to consider in the next SA of LDF documents and should be particularly considered in any AAP or subsequent locational policies.</p>	<p>The wider determinants of health are addressed by SD objective 2 and other relevant objectives, e.g. housing, economic development etc.</p>
<ul style="list-style-type: none"> <li>- In relation to town centres, assessment done in term of infrastructure. It did not cover the impact of economic development on health and well being.</li> </ul>	<p><b>Conclusions:</b></p> <ul style="list-style-type: none"> <li>- The sustainable appraisal has assessed the implications of the core strategy on health and well being.</li> <li>- However the sustainable assessment focused on infrastructure and may have not fully considered the direct health impact. There are areas (see above) where public health concerns are not fully assessed such as impact of certain economic activities on health risky behaviour (such as night economy), climate change and demand for health services</li> </ul> <p>See comment below in relation to climate change.</p> <p>Binge drinking is a national cultural issue which it is considered the Core Strategy has limited control over. The potential effects on health of improving access to nightlife is referenced (e.g. PN2 Vauxhall). We should</p>

	<p>note that this is something to consider in the next SA of LDF documents and should be particularly considered in any AAP or subsequent locational policies.</p>
<ul style="list-style-type: none"> <li>- Recommend to complete the assessment with a conduct a health and well being/ mental health impact of climate change and the energy development plan as there are issues of potentially worsening air quality; a mental health and wellbeing impact assessment of strategy for quality of the built environment</li> </ul>	<p>It is considered more appropriate that a study on the well being / mental health issues associated with climate change is something that needs to be addressed at the national or London-wide level. The same applies to an assessment of mental health and wellbeing of a strategy for quality of the built environment.</p> <p>Air quality issues associate with certain types of renewable energy have been considered in the SA and appropriate mitigation put forward in relation to biomass developments.</p>
<ul style="list-style-type: none"> <li>- More in depth review of the implication of increased birth rate and demographic changes on demand for health services</li> <li>- Confirm the absence of relations between waste management and well being</li> </ul>	<p>It is considered that the SA has dealt with health infrastructure adequately. Demand for health services needs to be considered in detail by Lambeth Council and Lambeth NHS and delivered through developer contributions which is stated within Policy S10 – Planning Obligations.</p> <p>This should be considered in the next SAs of the LDF DPDs.</p>
<b>Other consultation responses (numbers follow Council's consultation response table)</b>	
3. Excellent approach	No action.
7. It is an overbearing document of 381 pages written by professionals for professionals. It seems to try to be all things to all people and so couched in qualifications and reservations to be rendered meaningless.	No action.
15. I understand the pressures to provide housing to meet growth targets. Vauxhall/Nine Elms should not be seen as the main area to provide these solutions through the development of tall buildings.	No action.
19. 381 pages is not very sustainable. It is nigh on impossible to 'get into' the core priorities and how they are going to be applied to areas which are not Major Town Centres.	Noted.

34. It seems good to me.	No action.  Noted.
77. The sustainability appraisal covers all aspects of sustainability we would like to see including economic and environmental. We would concur on comments regarding the importance of retro-fitting buildings and combating summer over-heating as south London does suffer from a large number of old buildings which are energy inefficient. It was agreed that alternative fuels could also play a role in helping transport both public and commercial to be more environmentally friendly e.g. reusing waste such as fat from restaurants which can be converted into fuel.	