

London Borough of Lambeth Local Development Framework Core Strategy

Sustainability Appraisal Adoption Statement

1. Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) background

Sustainability Appraisals are a requirement of the Planning and Compulsory Purchase Act (2004) and Strategic Environmental Assessments are required by European Directive EC/2001/42 (SEA Directive), which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes 2004 ('SEA Regulations'). Central government guidance (ODPM, 2005) has merged these processes to allow for a single joint appraisal to be carried out.

The SEA Regulations require local planning authorities to carry out formal strategic environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. The SEA process ensures that opportunities for public involvement are provided and the significant environmental effects arising from policies, plans and programmes are predicted, evaluated, mitigated and monitored, with a view to promoting sustainable development.

Planning Policy Statement 12 requires a Sustainability Appraisal of development plan documents, which incorporates the requirements of the Strategic Environmental Assessment Directive but broadens this to include both social and economic considerations. The purpose of Sustainability Appraisal (SA) is to systematically appraise the social, environmental and economic effects of the strategies and policies in a development plan document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

Throughout the remainder of this statement, reference to SA encompasses the requirements of a merged SA / SEA.

2. Adoption statement requirements

The Lambeth Local Development Framework Core Strategy Development Plan Document was formally adopted by the council on 19 January 2011. In accordance with Regulation 16 (3) and (4) of the SEA Regulations, the council has produced this Sustainability Appraisal (SA) adoption statement. It describes how the SA process has influenced the progression of the Core Strategy, how environmental considerations and consultation responses have been taken into account during the development of the DPD and also outlines the reasons for choosing the Preferred Strategy in light of other reasonable alternatives. It also sets out

measures that will be used to monitor the effects of the DPD. Further information is set out in Annex 1.

3. SA process

The Core Strategy sets out the vision, strategic objectives, spatial strategy and policies for the spatial development of the borough over the next 15 years. The SA of the Core Strategy was undertaken on behalf of the council by CAG Consultants working jointly with ENVIRON. It comprised a number of stages:

- The production of an SA Scoping report, which examined sustainability issues in the borough. 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 was published for consultation in November and December 2008;
- The appraisal of the Core Strategy Issues and Options, the results of which are presented within the SA reports (March 2009 and August 2009);
- The appraisal of the Draft Core Strategy and preparation of the Draft SA report (March 2009) for consultation during April and May 2009;
- The appraisal of the Submission Version Core Strategy and preparation of a revised (final) SA report (August 2009). This presents the results for the whole SA process including information gathered, the method used and the results of the appraisal of the Core Strategy as it has developed.

At each stage, the vision, objectives and policy content of the Core Strategy were assessed against a framework of sustainability objectives, covering social, environmental and economic issues, reflecting both national, regional and local issues as well as environmental considerations set out in the SEA guidance. The table below summarises the key sustainability issues and how these related to the selected SA objectives.

Table 1 Key Sustainability Issues

Lambeth key issue	London key issue	SA objectives
Increase the overall supply and mix of housing , including affordable housing. Capacity for conversions.	Housing: the need for affordable and sustainable housing and different types of dwelling, spiralling housing costs and increased demand.	Objective 6 Housing.
Provide the essential infrastructure to support population growth.		Objective 4 Provision of essential infrastructure, 2 Health and wellbeing and 3 Access to services.
Develop mixed, cohesive, safe communities accessible to all.	Equality and diversity: meeting the needs of a growing population with a changing demography, greater diversity and worsening trends of social inequalities. Safety and security: high levels of	Objectives 1 Crime and safety, 3 Access to services, 5 Equality and diversity and 7 Liveability and place.

Lambeth key issue	London key issue	SA objectives
	crime and perception of crime, the continuing threat of terrorism and the need to make London safe for both visitors and residents.	
Provide good access to local services and community facilities within neighbourhoods.	Accessibility/availability: ongoing pressure to move around London and potential adverse impacts in the form of congestion, increased pressure on public transport systems and so on.	Objectives 3 Access to services and 9 Transport and travel.
Increase the number and variety of jobs in the local economy , including local jobs for local people.	Stable economy: continued high rates of child poverty and the relative impacts on the capacity of Londoners to engage economically and socially. Employment: high levels of unemployment, 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.	Objectives 15 Education and skills, 16 Local economy and 18 Tackling worklessness.
Support the growth of key economic sectors through new business development, business retention and inward investment.		Objective 16 Local economy.
Create viable, safe and well managed town centres.		Objectives 1 Crime and safety, 3 Access to services and 7 Liveability and place.
Support the regeneration and renewal of London Plan Opportunity Areas .	Regeneration and land use: regeneration in the Waterloo and Vauxhall Opportunity areas is expected to maximise densities, taking account of local residential amenity and other needs.	Objectives 3 Access to services, 5 Equality and diversity, 7 Liveability and place and 17 Regeneration and efficient use of land.
Reduce carbon emissions from residents, businesses, public services and buildings. Implement measures to help Lambeth adapt to the consequences of inevitable climate change , including flood risk management	Climate change: 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.	Objectives 11 Climate change and energy and 12 Water resources and flood risk management (and 1 Crime and safety).
Increase public transport accessibility and promote walking and cycling.		Objectives 3 Access to services 7 Liveability and place and 9 Transport and travel.

Lambeth key issue	London key issue	SA objectives
<p>Maximise the efficient use and management of resources, including water, energy and waste.</p>	<p>Natural resources: increasing demand for water, use of energy, pressure on biodiversity and open space arising from population growth and increased economic activity.</p> <p>Waste: 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.</p> <p>Air quality: London still suffers from some of the worst air quality in the UK and is in breach of two EU targets.</p> <p>Health and well-being: 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.</p>	<p>Objectives 10 Biodiversity, 11 Climate change and energy, 12 Water resources and flood risk management, 13 Waste and 14 Air quality.</p>

4. How sustainability and environmental considerations have been integrated into the Core Strategy

The Core Strategy integrates sustainability and environmental issues in the following key ways:

- Increasing the overall supply of housing and increasing the mix and quality of housing (including affordable, key worker and family housing) to meet demand identified through the Strategic Housing Market Assessment.
- Supporting 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.
- Increasing 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.
- Reducing carbon emissions by minimising the need to travel and maximising energy efficiency and renewable energy generation in buildings and area regeneration schemes.

- Safeguarding and increasing biodiversity through co-ordinated implementation of the Lambeth Biodiversity Action Plan.
- Enabling 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 of water.
- Provision of 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.
- Working 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.
- Providing 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.
- Contributing 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.
- Increasing 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.
- Contributing 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.
- Developing and sustaining 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).
- Increasing 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.

- Creating and sustaining distinctive local places through excellent design of buildings and the public realm, valuing heritage, identity, cultural assets and the natural environment.
- Protecting and enhancing 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.
- Supporting 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.
- Maintaining and developing 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.

5. How the consultation findings have been taken into account

The SA of the Core Strategy was an iterative process, with the SA process informing policy formulation at every stage. The following sections explain how the SA and consultation have been taken into account, and the reasons for choosing the Core Strategy as adopted, rather than the alternative options proposed.

Consultation throughout the SA process has been undertaken in accordance with Article 6 of the SEA Directive, the SEA Regulations, the Town and Country Planning (Local Development) (England) Regulations 2004, the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 and Lambeth's adopted Statement of Community Involvement (April 2008).

Work on the Core Strategy began in January 2008. The table below summarises the key stages in the development of the Core Strategy, the timetable and the opportunities for comment during the process. At each stage the Core Strategy was revisited to ensure that comments received could be addressed, as appropriate.

Table 2 Key Stages in the Development of the Core Strategy

Stage	Timetable	Opportunity to comment?
Non-statutory consultation on initial issues for the Core Strategy	February to March 2008	Yes
Statutory consultation on Issues and Options	April to June 2008	Yes
Statutory consultation on Sustainability Appraisal Scoping Report	November to December 2008	Yes

Non-statutory consultation on a draft Core Strategy and consultation on the draft Sustainability Appraisal and Habitats Regulations Assessment Screening Report	April to May 2009	Yes
Corporate EIA Panel	May and July 2009	Yes – in relation to impact on equality groups and socio-economic factors
Statutory pre-submission publication	November 2009	Yes – in relation to ‘soundness’
Submission to the Secretary of State	March 2010	No
Examination by an independent planning inspector	September 2010	Yes – if representations were made at pre-submission publication stage
Receipt of binding Inspector’s report	December 2010	No
Adoption of the Core Strategy	January 2011	No

The aim of the first two stages of consultation was to understand public and stakeholder views and to invite feedback on the Issues and Options for the Core Strategy so that a preferred approach could be developed. The aim of the third stage of consultation was to obtain feedback and test the preferred approach reflected in the Draft Core Strategy. In addition, this stage sought views on the recommendations of the Sustainability Appraisal of the Draft Core Strategy and the extent to which respondents thought that these had been adequately addressed.

The LDF Core Strategy Consultation Statement, published in November 2009, describes how the council has undertaken community participation and involvement in the development of the Core Strategy.

Details of the consultation undertaken at two key stages in the preparation of the Core Strategy (Issues and Options and publication of the Draft Core Strategy), and the results of this have also been published in two separate consultation reports:

- Preparing the Lambeth Local Development Framework: Core Strategy Issues and Options Consultation Final Report (July 2008)
- Preparing the Lambeth Local Development Framework: Draft Core Strategy Consultation Report (June 2009)

A schedule of all written representations received during consultation on the Draft Core Strategy and a statement of how these have been considered and dealt with are contained in the Draft Core Strategy Consultation – Schedule of Written Responses (September 2009). This identifies where changes were made during redrafting to the Core Strategy as result of representations received. Similarly, a Statement of Representations received at Pre-Submission Publication Stage was produced and published in March 2010.

These reports and schedules of written responses are available to view on the council's website (www.lambeth.gov.uk).

The following sections detail the consultation undertaken in relation to the SA.

5.1 Scoping Report consultation

Consultation on the Scoping Report was carried out in November and December 2008. Three key bodies are required to be consulted on the Scoping Report – the Environment Agency, English Heritage and Natural England. The guidance states that it is also desirable for other bodies to be consulted, as the Council considers appropriate. Therefore, in addition to the three statutory consultees, the following bodies were also actively consulted: London Wildlife Trust; Greater London Authority; Government Office for London; Thames Water; Lambeth Primary Care Trust (PCT); and the neighbouring boroughs of Wandsworth, Croydon, Southwark, Westminster, Merton, Bromley and the City of London. The Scoping report was also published on the Lambeth website giving other interested parties an opportunity to comment.

Responses were received from the three statutory consultees plus: Lambeth PCT; Thames Water; a Planning Consultancy; Transition Town Brixton; Guy's and St. Thomas' NHS; and Wandsworth Council.

A number of amendments were made to the Scoping Report as a result of comments received, including:

- strengthened policy context and appraisal objectives on water on flooding issues in response to EA and Thames Water comments;
- strengthened built heritage baseline information and commentary in response to English Heritage and protection and enhancement of built heritage assets added as a key issue;
- added new prompt question '*promoting the highest standards of energy and environmental performance for new and existing buildings*', partially in response to stakeholder comments;
- amended key health documents and health evidence base in response to Lambeth PCT and new prompt question added on health infrastructure in response to Guys and St. Thomas';

- amendments made to sections on transport, schools and parks as a result of comments received from internal LB Lambeth staff.

5.2 Preferred Options consultation

The Draft SA was issued for consultation alongside the Draft Core Strategy during April and May 2009. Comments on the SA were received from a variety of stakeholders, with substantial responses from English Heritage, the Environment Agency, Natural England and NHS Lambeth (Planning Policy Team). These resulted in the following action:

- Changes to indicators recommended for monitoring purposes;
- Comments on baseline data, evidence base and methodology noted for consideration when Scoping Report reviewed/applied to other DPDs;
- Various issues noted to action in relation to SA of related DPDs.

5.3 Submission consultation

The Submission SA went out for public consultation with the Core Strategy Proposed Submission during November to December 2009. Comments on this version of the SA were only received from English Heritage and a local Councillor. No further changes were made to the SA as a result of these comments.

5.4 Examination

The Core Strategy was submitted to the government for examination by an independent Planning Inspector on 26 March 2010. The examination involved a public hearing which took place over four days during September 2010.

The Inspector's report was received on 6 December 2010, finding the Core Strategy sound. The Inspector's report endorsed a number of minor changes to wording of the Core Strategy that had been proposed by the council. None of the changes represented a significant change to the Core Strategy, such that further public consultation or sustainability appraisal would be required.

6. Key changes brought about by the SA process

The SA process was integral to the Core Strategy preparation, commencing with the production of the SA Scoping Report. This involved identifying the sustainability issues and objectives for the Core Strategy (the SA framework), as well as identifying relevant baseline information and indicators.

The Core Strategy went through three distinct iterations. At each stage the Core Strategy was tested against the SA framework so that the social, economic and environmental implications of different policy options could be taken into consideration in its development. The Core Strategy approach was developed and modified, as appropriate, in line with the findings of the SA.

Some of the key changes made to the Core Strategy as a result of SA comments are set out below. In addition, the SA has been instrumental in contributing to improved policy

content on a range of other important sustainability issues in the borough, such as provision of school places. 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.

For full details of the outcomes of the appraisal process please refer to the SA Report, August 2009.

7. Options - Reasons for choosing the Core Strategy as adopted in light of other reasonable alternatives dealt with

The Issues and Options Report presented a number of options and reasonable alternatives on the spatial strategy to be pursued, including options for housing, flat conversions, employment, waste management and tall buildings.

An Issues and Options SA Briefing Paper was produced by CAG / ENVIRON in December 2008, which outlined the results of the sustainability appraisal of the issues and options report. This report examined the sustainability effects of the issues and options put forward for consideration and this report provided recommendations to the Council as to how to develop the preferred options in a sustainable manner.

These key spatial issues and options related to:

- the additional opportunities for the development of new homes
- the mix of affordable and market-priced housing

- the mix of dwelling sizes to meet housing need
- the level of density for new residential development
- where to allow new conversion of houses into flats
- how to increase the number and variety of jobs in the borough
- how to achieve an adequate supply of affordable business premises
- how to increase the borough's sustainable waste management capacity
- where to locate tall buildings.

Following consideration of the SA recommendations alongside the consultation results, a preferred approach was developed and reflected in the Core Strategy. This process has helped to ensure that the Core Strategy proposes the most appropriate strategy for the spatial development of the borough, given reasonable alternatives. In summary, the preferred approach involves:

- promotion of both economic and housing growth across the borough, with housing supply supporting economic growth by helping to ensure an appropriate supply of labour at both local and sub-regional levels;
- a focus for growth and development on Waterloo and Vauxhall (supporting the London Plan Opportunity Areas) and town centres – including through the regeneration of Brixton and other centres –addressing the issues of transport capacity and other physical infrastructure in key locations;
- town centre regeneration to include housing in appropriate locations;
- the mix, balance and diversity of residential neighbourhoods to be maintained, with an emphasis on increasing choice in the type and location of affordable housing overall;
- keeping the existing requirement for 50 per cent affordable housing across the borough, with flexibility only in very clearly defined circumstances to enable housing estate regeneration;
- dwelling mix for affordable housing to be defined through housing needs/market assessment data;
- a limitation on flat conversions, using clearly defined criteria;
- an approach to density that reflects the London Plan approach;

- making clear the Council's support for tall buildings in appropriate locations to deliver regeneration and economic objectives in accordance with London Plan and national policies;
- strengthening the existing policy approach to Key Industrial and Business Areas (KIBAs), removing 'mixed use employment areas' in these locations;
- support for community facilities both to enable local service delivery at neighbourhood level and to meet the changing needs of Lambeth's communities, including the need for assembly space for faith groups.

8. Monitoring

The SEA Directive requires the significant environmental effects of implementing the plan to be monitored "*in order, inter alia, to identify [...] unforeseen adverse effects and to be able to undertake remedial action*" (Article 10(1)). Local planning authorities should adopt an integrated approach to monitoring local development frameworks that takes full account of the monitoring needs of sustainability appraisal and the SEA Directive.

Delivery of the Core Strategy will be monitored annually through a framework of performance indicators and periodic reviews of the infrastructure schedule. This information will be published in the statutory Annual Monitoring Report, produced in December each year. Where, as a result of monitoring, indicators show that a policy is not working or key targets are not being met this remedial action may be taken or it may give rise to a review of the Core Strategy or other parts of the Local Development Framework.

The table on page 110 (section 6.26 onwards) of the Core Strategy sets out the framework of performance indicators and includes targets where these apply. The majority of the performance indicators are statutory 'Core Output Indicators' and the reference numbers refer to the Department of Communities and Local Government's 'Regional Spatial Strategy and Local Development Framework Core Output Indicators – Update 2/2008' and start with the prefix COI. Some are National Indicators also reported in Lambeth's Local Area Agreement, and in these cases the reference starts with the prefix NI. The remainder are Local Output Indicators and start with the prefix LOI.

Annex 1 Adoption statement requirements

The CLG Plan Making Manual <http://www.pas.gov.uk/pas/core/page.do?pagelId=152871> states:

When the Core Strategy is adopted (incorporating any changes required by the Inspector), the local authority must issue a statement summarising:

- sustainability considerations - how these have been integrated into the development plan document;
- options and consultation responses - how any received on the development plan document and sustainability appraisal reports (at all stages) have been taken into account (building on or integrating the information provided as part of the statement for submission under Regulation 30(1)(d));
- alternatives - reasons for of the choice of alternatives in light of other reasonable alternatives considered;
- monitoring sustainability effects - measures to be taken to monitor the significant sustainability effects of implementing the development plan document (noting that the sustainability appraisal report and any revisions to it at earlier stages should already have documented proposed monitoring arrangements).

The SEA regulations require:

- 'a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Art. 5, the opinions expressed pursuant to Art. 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with';