

NON-TECHNICAL SUMMARY
Sustainability Appraisal Lambeth Local Plan
Proposed Submission

October 2013



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1. Introduction

1.1 This Non-Technical Summary summarises the findings of the Sustainability Appraisal (SA) of the Lambeth Local Plan for the London Borough of Lambeth. An SA promotes sustainable development through the integration of social, environmental and economic considerations into the preparation of new planning documents. It is required by Section 39 of the Planning and Compulsory Purchase Act 2004.

1.2 The Non-Technical Summary is part of the Sustainability Report for the Lambeth Local Plan Proposed Submission November 2013 (referred to as the Local Plan). The SA report has been produced alongside the Local Plan to provide guidance on its development. This report presents the key findings to date of the Sustainability Appraisal on the Local Plan and provides background and relevant additional information.

2 The Local Plan

2.1 A new Local Plan for Lambeth includes the existing Core Strategy 2011 and new detailed planning policies for development management and sites. The vision, strategic objectives and spatial strategy of the Core Strategy has not changed (other than factual updating), as they have been recently developed and adopted.

2.2 The Local Plan sets out the general approach and specific policies for development. It identifies sites for development within Lambeth to cover the period up to 2030. It is based on the social, economic and environmental aims of the Lambeth Community Plan 2013 – 2016 together with other relevant plans, programmes and strategies.

2.3 Proposed updates or highlights of new Local Plan policy include:

- § Developments of less than 10 new homes to make a financial contribution to affordable housing
- § New ways of assessing proposals for student housing such as being part of a mixed use development and linked to a college or university
- § Controls on the number of betting shops, pawn brokers, and money shops (A2 uses) in one area
- § Protection of public houses
- § Key Industrial Business Areas (KIBAs) only allowed for business and industrial uses and the exception to allow schools is removed
- § Preventing new hot food takeaways opening within 400m of a primary or secondary school.

3 The Sustainability Appraisal

3.1 The purpose of the SA is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response. It aims to make sure that the final version of the Local Plan takes a more sustainable planning approach to development in the borough.

3.2 Sustainability Appraisals must follow Government guidance on Sustainability Appraisal, and must meet the requirements of the European Strategic Environmental Assessment Directive. A summary of the method used to undertake the SA on the Local Plan is set out below in Table 1.

Table 1: SA process thus far

Date	Actions
SA Stage A: Setting the context and objectives, establishing the baseline and deciding on scope	
November 2008	The first Scoping Report was published for consultation over a five-week period from early November 2008 and provided a summary of the current environmental, social and economic conditions in Lambeth. This baseline information of the Scoping Report assisted in the development of the Sustainability Appraisal Framework.
September 2010	The Scoping Report March 2009 was updated in preparation of producing other Development Plan Documents. The Sustainability Framework was reviewed at this time and was broadly found to remain relevant for the development management policies however; it was considered that the Framework should be adapted for appraising the site allocations
October and November 2010	A joint consultation exercise was carried out on the updated SA scoping in October and November 2010. Consultation responses were received from the following organisations: <ul style="list-style-type: none"> • English Heritage; • Environment Agency; • Lambeth Primary Care Trust; • Coal Authority; • Highways Agency; • Lambeth Council ecologist; and • Lambeth police/community safety
Stage B: Developing and refining alternatives and assessing their effects; and Stage C: Preparing the Sustainability Appraisal Report	
March 2009	A Sustainability Appraisal was carried out on the draft Core Strategy which made 60 recommendations to the Council for consideration into the Core Strategy. Many recommendations were included in the Submission Version Core Strategy, demonstrating the meaningful influence the SA has had on plan preparation in Lambeth.
August 2009	An SA Report on the Submission Core Strategy was prepared following consultation in April and May 2009 on the draft Core Strategy and its accompanying SA. Recommendations made in this SA generally fell into two categories: <ul style="list-style-type: none"> • identification of issues within policies that were considered to be addressed in other policies; or • identification of issues that will be helpful in the preparation of the development management policies.
January 2011	The August 2009 SA Report was submitted with the Submission Version Core Strategy which was adopted in January 2011. On adoption of the Core Strategy, the Council published its SA Adoption Statement.
February 2013	A SA was prepared on the draft Local Plan. This made 176 recommendations to improve policy performance of the Plan (i.e. maximise positive effects or reduce negative effects). The policy team considered each recommendation and where appropriate, changes were made to policy in the revised Local Plan.
October 2013	This SA Report predicts and evaluates the significant effects of the latest version of the Local Plan. Where appropriate, recommendations have been made to reduce adverse effects and maximise beneficial effects.
Stage D: Consulting on the Local Plan and SA Report	
March 2013	The SA Report (Feb 2013), along with the draft Local Plan were both available for public consultation for 6 weeks. The feedback received from this consultation was considered for the final Local Plan document.
October 2013	This SA Report (October 2013) is available as a supporting document to the Lambeth Local Plan Proposed Submission November 2013.
Stage E: Monitoring the significant effects of implementing the Local Plan	
October 2013	The Sustainability Appraisal makes recommendations for how significant and uncertain effects of the Local Plan should be monitored.

- 4.1 The London Borough of Lambeth covers an area of about ten and a half square miles, including Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse Hill, West Norwood and Gypsy Hill. Located in the southwest of London, Lambeth has approximately 3.2 kilometres of Thames frontage, and is situated on the southern bank of the Thames neighbouring the boroughs of Southwark, Croydon, and Wandsworth and Merton to the east south and west respectively, and Westminster and the City of London to the north across the Thames. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character.
- 4.2 Lambeth is an area of contrasts. The northern part of the borough features internationally-significant central London activities centred around Waterloo and South Bank area, including the South Bank Centre, major corporate offices, the London Eye and Oval Cricket Ground. South are the varied centres of Brixton and Clapham with their unique blend of entertainment, speciality retail and cultural industries, surrounded by a culturally-diverse residential population. Further south again are the suburbs of Streatham and Norwood which also feature locally important town centres. With no strategic industrial locations in Lambeth, locally significant sites known as Key Industrial Business Areas are protected and these are scattered throughout the Borough providing a total area of 47.9 hectares.
- 4.3 The Borough has an important historic environment with 62 Conservation Areas covering approximately 30 per cent of the Borough including circa 2,500 listed buildings, the vast majority of which are nineteenth century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.
- 4.4 Table 2 below lists key statistics in Lambeth for sustainability topic areas.

Table 2: Key sustainability statistics in Lambeth

Social	
Crime	<ul style="list-style-type: none"> § For the financial year 2012/13 total number of crimes decreased by 6.2 percent to 34,841 total crimes § Total Notifiable Offences (TNOs) fell for eight successive years between 2001 and 2009. Even following a small rise in 2009/10, TNOs were still more than 30% below the figure for 2000. § A recent survey found that 69% of residents feel safe when outside in the area they live after dark, up from 54% in November 2009.
Health	<ul style="list-style-type: none"> § Lambeth fares comparatively worse for health inequalities when compared nationally § Lambeth male life expectancy is 77 years compared with England average of 78.5 years; Lambeth female life expectancy is 81 years compared with 82.5 year England average § Healthy lifestyle issues still a concern (smoking, obesity, lack of physical activity, alcohol, drug misuse) § About 18% of Lambeth households are estimated to be in fuel poverty
Infrastructure	<ul style="list-style-type: none"> § Existing transport infrastructure is very well used and over capacity in places § Number of school places currently insufficient to meet future demand § Insufficient capacity in Lambeth cemeteries to deal with future demand for burials § Lambeth has 270 hectares of open space which is about 10% total land area.
Equality	<ul style="list-style-type: none"> § 14th most deprived borough in England, comparable with Southwark, Lewisham and Haringey, but less deprived than most deprived boroughs of Newham, Tower Hamlets and Hackney § very diverse constantly evolving Borough ethnically, culturally, socially and economically § Lambeth has one of the highest Black African and Black Caribbean populations in London (11.5% and 9.8% of total borough population respectively) as well as sizeable Portuguese, Polish and Vietnamese communities. § 55% of Lambeth residents identify themselves as Christian, 6% as Muslim and 33% say they do not have a religion
Housing	<ul style="list-style-type: none"> § 73% of stock is flats – typical of inner London

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	<ul style="list-style-type: none"> § Approx 67% households live in rented accommodation; 30% own their own home (amongst lowest nationally for occupiers and mortgagees) § Urgent need for more affordable housing, especially for families § 130,000 households in Lambeth
Liveability	<ul style="list-style-type: none"> § Population churn is at around 22-24% for last few years; about 88% of population remains same each year § Some communities feel their neighbourhoods lack stability and that not enough households stay long enough to put down roots.
Heritage	<ul style="list-style-type: none"> § In 2012 there were 40 buildings on the Heritage at Risk register
Environmental	
Biodiversity	<ul style="list-style-type: none"> § 10 priority habitats and 7 priority species in Borough § 45 Sites of Importance for Nature Conservation; 96% in positive management.
Carbon emissions	<ul style="list-style-type: none"> § Lambeth's total CO₂ emissions within the scope of influence of the Local Authority was 1290.4 kilotonnes CO₂ for 2009 § Industry and commercial uses accounted for 39%, domestic accounted for 41% and the remaining 20% was attributed to road transport. § Lambeth has achieved a 12% per capita reduction in emissions since 2005
Flood risk	<ul style="list-style-type: none"> § Much of north of Borough is within flood zone 3a for 1 in 100 year flooding from Thames § Some flood risk around River Wandle
Water	<ul style="list-style-type: none"> § Average household water consumption in 2010/11 was 166.5 litres per person per day
Waste	<ul style="list-style-type: none"> § Total amount of waste arising in Lambeth has continued to decrease periodically § Household waste recycled has increased from 10% in 2001/02 to almost 28% 2010/11 § Current shortfall of 197,417 tonnes per annum between capacity of existing waste sites in Lambeth and London Plan apportionment to 2031
Air	<ul style="list-style-type: none"> § Whole Borough in Area Quality management Area § Borough continues to suffer from high levels of fine particles (PM10) and Nitrogen Dioxide – much like London as a whole
Economic	
Economy	<ul style="list-style-type: none"> § Around 10,000 business in Lambeth of which 75% have fewer than 5 employees § Over 99% of businesses in Borough are small and medium enterprises § Relatively high levels of unemployment – October 2012 it was 5.6% of the population (a11830 residents) and was 1.4 percentage points higher than London average of 4.2% § Unemployment rate for ethnic minorities was 17% based on Annual Population Survey results for 2009/10. This was 10.5 percentage points higher than the unemployment rate for white residents (6.5%) and higher than the BME unemployment rate across London (13.6%). However, Lambeth's ethnic minority employment (61%) is higher than the London average (58.1%).
Regeneration	<ul style="list-style-type: none"> § A number of regeneration projects current in Borough including Lower Marsh Regeneration Project; Shell Centre site Masterplan Streatham and West Norwood High Streets; Vauxhall Nine Elms / Battersea Opportunity Area; Waterloo Opportunity Area; and Future Lambeth projects: Brixton, Clapham, Kennington, Norwood, Streatham.

5 What would happen without the Local Plan

- 5.1 The SA is required to look at what the effect on the current conditions would be if there was no Local Plan. In general it is considered that there would be little difference, as there are already policies in place to protect Lambeth in the current Core Strategy and saved UDP policies. However, if there was no Local Plan there would be a risk that policies within these documents may be considered 'out-of-date' under the National Planning Policy Framework (NPPF). In this situation decisions would be made following national and regional policies, which may not always be appropriate for the local context of Lambeth.
- 5.2 For example, as long as development proposals meet the NPPF definition of sustainable development, applications must be approved. This may result in more student housing than desired for the Borough, or loss of employment generating land or lower than desired standards of sustainability of the built form.
- 5.3 Another issue is that there is an increasing demand for housing and especially affordable and sustainable housing within the Borough. Absence of the Local Plan would not be likely to provide the amount of affordable housing needed in the right locations in the Borough. There are a high proportion of apartments within Lambeth. Different types and sizes of housing are needed and this may not be achieved

without the Local Plan.

- 5.4 In general development agreed without a Local Plan may not fit local needs. For example, the right development may not happen in our town centres and the right services and facilities might not be developed for the expected growth in population.

6 Key sustainability issues

- 6.1 The diverse character of Lambeth has resulted in a number of complex sustainability issues (see Table 3 below).

Table 3: Summary of key sustainability issues in Lambeth

Characteristics	Key sustainability issues (summary)
<p>Housing</p> <ul style="list-style-type: none"> • Access to good housing. • Affordable housing. • Sustainable housing. • Housing mix and types. 	<ul style="list-style-type: none"> • Cost of housing is a major issue. • Shortage of affordable family sized accommodation • Shortages of housing suitable for people with extra care needs, mental health needs, learning disabilities, substance misusers and ex-offenders
<p>Employment and Economy</p> <ul style="list-style-type: none"> • Increasing jobs, particularly local jobs for local people. • Addressing high rates of child poverty. • Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups. • Tackling barriers to employment. • London's role in the UK economy. • Managing evening economy and food and drink uses • New business development. • Business retention. • Inward investment. • Targeting key economic sectors. • School placements 	<ul style="list-style-type: none"> • Not enough variety of local businesses • Range of difficulties stopping people find work. Problems include: <ul style="list-style-type: none"> ○ low skill levels and low levels of educational attainment ○ reluctance to take 'low quality' jobs in some cases, ○ difficulty finding suitable work within easy travelling distance ○ difficulty finding affordable childcare ○ a history of offending, substance misuse or mental illness, physical or learning disabilities ○ lack of space to start businesses from home in very high density housing • The new 'green industries' are a growth sector covering construction, energy and waste management that will bring new jobs opportunities and skills for local people • The number of school places in the Borough is currently insufficient to meet future demand, both at secondary and primary level. • There is a need to control the location of new betting offices, pawnbrokers and pay-day lenders. Too many in one area can lead to a negative impact on the vitality and viability of a town centre. • Evening economy and food and drinks uses bring investment and vitality into areas however, this has also brought some problems in terms of its impact on local residents. • Pubs are being lost at an alarming rate. Pubs can provide a valuable community asset and are a hub for social interaction. They also have a valuable economic role, contributing to local employment generation.
<p>Environment and Climate Change</p> <ul style="list-style-type: none"> § Reducing CO2 emissions. § Climate change adaptation, including flood risk management § Efficient use and management of resources. § Efficient use and management of water: addressing increasing 	<ul style="list-style-type: none"> § Flood risk is a key issue in some parts of the Borough § A large part of the north of the Borough is located within the highest flood risk zone (level 3a), with the principal risk from tidal flooding of the River Thames. § Additional risk of fluvial flooding close to the river Graveney in the south of the

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<p>demand.</p> <ul style="list-style-type: none"> § Efficient use and management of energy. § Efficient management of waste: increasing recycling rates and self sufficiency in waste disposal. § Pressure on biodiversity and open spaces. 	<p>Borough.</p> <ul style="list-style-type: none"> § Further risks arise across the Borough from sewer and surface water flooding. § Development s need to minimise energy consumption, contribute toward renewable energy production and help improve the environment through sustainable design and construction. § Mixed use development will work to minimise travel to work. § The domestic sector accounts for over half of energy consumption in the borough and gas is the main fuel type (82 per cent of total domestic consumption). § About 26% of Lambeth residents are in fuel poverty.
<p>Transport</p> <ul style="list-style-type: none"> § Good local access to services and facilities. § Tackling congestion. § Increase public transport accessibility, cycling and walking. 	<ul style="list-style-type: none"> § Public Transport provision in the borough is generally good, with 14 overground railway stations evenly spread throughout the borough and nine underground stations predominantly in the north. § Much of Lambeth's public transport infrastructure is extremely busy during peak hours. This situation will worsen with increasing living and working populations. § There are many bus routes, with major interchanges at Waterloo, Vauxhall and Brixton. § Public transport accessibility is good in north and central Lambeth. § Residents in Streatham and Norwood are without direct access to the underground and depend on rail and bus connections for their needs.
<p>Equalities and Accessibility</p> <ul style="list-style-type: none"> § 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. 	<ul style="list-style-type: none"> § Some communities feel that their neighbourhoods lack stability and that not enough households stay long enough to put down roots and contribute positively to community life. § A number of Lambeth's neighbourhoods are currently struggling with: <ul style="list-style-type: none"> ○ high levels of ill-health (including mental ill-health), ○ educational under-achievement ○ child poverty, ○ worklessness ○ crime and fear of crime ○ gang-related violence and anti-social behaviour • Community facilitates are unevenly spread across the Borough, with some neighbourhoods experiencing big shortages of useable space, while others apparently have too many under-used facilities. • The most deprived areas are spread throughout the Borough but are particularly concentrated in Coldharbour ward, in Brixton, and in the Crown Lane area of Knights Hill ward in the south of the Borough.
<p>Health and Well Being</p> <ul style="list-style-type: none"> § Improving air quality (and meeting EU targets). • Addressing health inequalities and the health needs of Lambeth's existing and new 	<ul style="list-style-type: none"> • Road traffic is the primary cause of air pollution in Lambeth • The vehicle emissions of greatest concern are Nitrogen Dioxide, Fine Particulates (PM10), Carbon Monoxide and Volatile Organic Compounds (VOC's) such as

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<p>residents.</p> <ul style="list-style-type: none"> Develop healthy communities and help improve and protect the health and well being of residents.' 	<p>Benzene. High levels of any of these pollutants can affect health.</p> <ul style="list-style-type: none"> It is estimated that vehicles in Lambeth emit over 20,000 tonnes of the above pollutants every year. This contributes about 90% of air pollution emissions in Lambeth. In addition vehicles in Lambeth create nearly a quarter of a million tonnes of the greenhouse gas carbon dioxide which contributes to global warming. Health facilities need to be able to deliver services to the increasing population. Access to leisure and recreation facilities needs to be improved for all residents in the Borough, but particularly for those in more deprived neighbourhoods. The health of local residents is a key concern of the Council. The location of hot food takeaway shops near schools is a concern for the Council as it provides easy access for children to access unhealthy food
<p>Town centres and Regeneration Viable, safe and well managed town centres:</p> <ul style="list-style-type: none"> Brixton Streatham Clapham Stockwell West Norwood / Tulse Hill <p>Regeneration of Vauxhall and Waterloo Opportunity Areas.</p>	<ul style="list-style-type: none"> Regeneration of Waterloo and Vauxhall is expected to maximise use of land, taking account of local residential amenity and other needs. New shops should support rather than undermine Lambeth's existing town centres, and be in areas of high public transport accessibility. Maintaining active streets and window displays with an appropriate mix of ground floor uses (shops etc) are also key issues along with the need to maintain and improve the environment, public realm and community safety. Brixton and Streatham, both have big potential for new commercial and residential development. Lambeth's local centres and street markets need strong protection given the essential contribution they make to neighbourhoods and communities, to local character and to reducing the need to travel.
<p>Open Space and Recreation</p> <ul style="list-style-type: none"> § Better use of open space § Biodiversity 	<ul style="list-style-type: none"> § Some areas, especially in the north of the Borough, have limited access to unrestricted open space. § The current amount of public open space will probably reduce as a result of more people in the borough. § Therefore, pressures on open space will become even more intense across the Borough, including burial spaces. § There is a need to protect and enhance the wide range of habitats and species that contribute to the Borough's biodiversity.
<p>The Built Environment</p> <ul style="list-style-type: none"> § Location of tall buildings § Built heritage 	<ul style="list-style-type: none"> § The Borough has a highly valued historic environment, including values views which must continue to be protected and enhanced.
<p>Infrastructure</p> <ul style="list-style-type: none"> § Infrastructure provision, including healthcare services and facilities; and schools 	<ul style="list-style-type: none"> § Lambeth's future housing growth, economic development and environmental sustainability cannot be achieved without a wide range of essential infrastructure. § Some areas of infrastructure provision are extra important over the next 15 years because they are already under much pressure, for example public transport school places, health and social care services, open space, facilities for policing the Borough and waste facilities.

7. Sustainability Appraisal Framework

7.1 The SA Framework is a way of considering the effects of the Local Plan. It is a list of social, economic and environmental objectives that the Plan is tested against. The

framework used is shown in the table below, which also shows how each objective meets SEA topic requirements. The SA Framework was developed in the Scoping Report and has since 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.

Table 4: Revised Sustainability Objectives and SEA Topic Requirement

	SA Objective	SEA Topic Requirement
1	Crime and safety. Ensuring safe communities with reduced crime and disorder.	Population
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.	Population, Human 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.	Population, Human Health
4	Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	Population, Human Health, Material Assets
5	Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Population, Human Health
6	Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Population, Human Health, Material Assets
7	Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.	Population, Human Health, Material Assets, Landscape, Cultural Heritage
8	Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets.'	Landscape, Cultural Heritage (including architectural and archaeological heritage)
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.	Population
10	Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	Biodiversity, Flora, Fauna, Landscape, Soil, Water
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.	Climatic Factors, Materials Assets
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.	Water, Climatic Factors
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.	Population, Material Assets
14	Air quality. To improve air quality.	Air
15	Education and skills. To maximise the education and skills levels of the population.	Population, Material Assets, Human Health
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.	Population, Material Assets
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.	Material Assets, Soil
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.	Population, Material Assets

8 Sustainability Appraisal Findings

8.1 An appraisal has been carried out on the sustainability of the Local Plan's policies and site allocations. The spatial strategy and vision and objectives are the same as those in the adopted Core Strategy. As they were appraised then, there is no need to appraise them again. Summary results of this previous appraisal of the vision and objectives of the Core Strategy are shown below:

'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.' (SA Core Strategy 2009).

Effects of Local Plan policies and site allocations on SA Objectives

- 8.2 First, it is considered important to point out that the level of growth proposed for the borough is required by the London Plan. The London Plan, in its preparation, was itself subject to SA in 2009– called in this case Integrated Impact Assessment (IIA). Overall, this document concluded that 'the assessment of the draft replacement London Plan has found it to be broadly positive when considered against the IIA objectives'.
- 8.3 The effects of the Local Plan on individual SA objectives are outlined below in Table 7. On the whole it is considered that the Local Plan policies have been produced with the premise of sustainability actively borne in mind. Sites earmarked for future comprehensive redevelopment are in locations that facilitate efficient accessibility to both areas within and outside of the Borough. The Local Plan aims to achieve high standards in the quality of development and contains many policies that seek to reduce or avoid adverse effects on the natural environment. Generally, the SA found that the Local Plan policies seek to achieve significant positive social and economic effects and avoid or reduce the effect of (mitigate) significant negative effects. It found that the scale, type and level of development proposed in the Local Plan will not give rise to significant negative effects on biodiversity, landscape, historic environment and natural resources. This is because of the protective nature of policies in the Plan. It is recognised that there will be increases in carbon emissions and water use associated with increased population growth, but policies which have been included in the Local Plan may mitigate these. The SA was not able to be definite about this because of uncertainties about the effects of these mitigation policies, which are discussed further below.
- 8.4 Uncertainties were mainly about whether housing and transport and social services and facilities would be built, and how successful environmental policies would be. Another issue is that it was not clear what effect controlling A2 uses (e.g. pawn brokers, money lenders, estate agents, betting shops) would have on the local economy.
- 8.5 Environmental issues which the SA could not be certain about were:
- whether higher environmental standards for new housing will be achieved (higher Code for Sustainable Home and BREEAM standards) as the policy suggests such standards are only required "unless it is not technically feasible or viable to do so";
 - whether living roofs and walls will be included in new development;

- how far carbon emissions will be reduced in the Borough;
- how strong the requirements for water efficiency measures in new development will be; and
- whether air quality will be significantly improved.

8.6 Another issue that the SA could not be certain about was how much of the new housing and supporting facilities and services will be delivered. This is considered to be a key issue for the Local Plan. For example, in the year 2011/12 the housing target was missed by 347 residential units and there were 2150 planning permissions for residential units not used / built out. Also, the Local Plan has a heavy reliance on new public transport servicing the Nine Elms Vauxhall Opportunity Area. An extension to the Northern Line is planned but it is highly unlikely it will be delivered before developments in the area are completed and occupied. Significant growth in the borough will place added pressure to public transport infrastructure which is already running at overcapacity in many areas, with funding not yet secured to help reduce such pressures. In the same way, funding for much needed healthcare and new school places has not yet been agreed.

SA Recommendations

8.7 Recommendations have been made in this SA with the aim of improving the impact of policies on sustainability or mitigating potential for negative effects. In brief, some of the main recommendations concern the following areas:

Table 5: Recommendations made and how they have been dealt with in the Local Plan

SA Recommendation	Council policy team response
Ensuring external amenity space for new dwelling is <i>private</i>	Accepted – policy amended
Planning applications should not be supported where transport impacts result in adverse air quality, noise and disturbance	Noted – policy Q2 applies
Public health as a consideration for refuse and recycling storage areas	Accepted – policy amended
Not allow flood defences to get to ‘poor condition’	Accepted – policy amended
Expectation that family housing is provided in housing proposals (removes word ‘normally’)	Accepted – policy amended
Allow residential above ground floor units, rather than just above shops	Accepted – policy amended
Effects of servicing sites should be managed for amenity of adjacent properties rather than only adjoining properties	Accepted – policy amended
Effects of new taxi ranks should be managed for the wider environment amenity, rather than only residential amenity	Accepted – policy amended
Flexibility to seek higher standards of sustainable design and construction in later stages of plan period	Accepted – policy amended
Redress potential inconsistency between Conservation Areas and Brixton policy in terms of protecting historic frontages	Accepted – policy amended
Encourage electric vehicles and charging points network across borough	Accepted – text amended
Ensure developments have capacity for adequate <i>water supply</i> as well as sewerage water capacity	Accepted – policy amended
On site waste management facilities provided for all developments	Noted, definition of waste management facilities amended for more clarified policy position
Guidance on climate change mitigation and adaptation for historic assets	Noted – for forthcoming SPD
Clarification on when tall building policy would apply	Noted – guidance provided in supporting text.

- 8.8 The Sustainability Appraisal has scored the sustainability effects of the Local Plan using the symbols shown in Table 6. Table 7 presents the final likely effects of the plan taking into account SA recommendations.

Table 6: Key symbols used in the appraisal

Symbol	Meaning
++	Significant positive effect on sustainability objective (normally direct)
+	Minor positive effect on sustainability objective
0	Neutral effect on sustainability objective
-	Minor negative effect on sustainability objective
--	Significant negative effect on sustainability objective (normally direct)
/	Policy has more than one score e.g. +/- policy could both support and conflict with the Sustainability Appraisal objective in a minor way.
?	Uncertain effect on sustainability objective

Considering alternative ways of delivering Local Plan objectives

- 8.9 The development of the Core Strategy and then the Local Plan has involved a process of considering different ways of achieving the Plan's objectives. These are called alternatives. Alternatives were first considered for the whole Plan (called strategic alternatives) and then for individual policies (called policy alternatives).
- 8.10 The SA is required to consider the effect of different alternatives on the sustainability objectives. Appraisal of the strategic alternatives and of many of the policy alternatives was done in the SA of the Core Strategy. The SA of the Core Strategy can be viewed online as Appendix 7 at <http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LocalPlan/SustainabilityAppraisalForThePlanningPolicyEvidenceBase.htm>
- 8.11 Where Local Plan policies are different from those appraised before, alternatives have been considered and appraised for these new policies. These broadly include the following areas: affordable housing, housing mix, student housing, KIBAs, business uses outside KIBAs, railway arches, town centres, evening economy and food and drinks uses, A2 uses, hot food takeaways near schools, skills and training, schools, food growing spaces, and waste management. The SA on the Draft Local Plan appraised the reasonable alternatives identified for these areas, and a summary of SA analysis of reasonable alternatives is provided in Appendix 5 of main SA Report. The outcomes of the SA work, together with consultation feedback have fed in to the Lambeth Local Plan Proposed Submission November 2013. Some key changes to policy approach resulting from this process include different retail capacities and different food and drink uses specific for each town centre (recognising the spatial variations of these uses across the borough) and controlling hot food takeaways near schools even within town centres.

9 Designated sites, including European Nature Conservation sites

- 9.1 The Council has considered whether the Local Plan is likely to have an effect on European wildlife sites, as required under European legislation. No European Sites lie wholly or partly within Lambeth Borough. Four European Sites (Richmond Park, Walthamstow Reservoirs, Wimbledon Common and Epping Forest) lie partially within 15 kilometres of the Lambeth Borough boundary. The screening assessment did not identify any likely significant adverse effects on any European Site. Similarly it was considered that the Draft Local Plan would not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage of Habitats Regulation Assessment (HRA) was not required on the Draft Local Plan. Natural England in their representation on the Draft Local Plan, SA and HRA agreed with

these conclusions.

- 9.2 It is considered that the Designated Sites of Nature Conservation Importance of Metropolitan, Borough and Local Importance are well protected for by policies in the Local Plan.

10 Technical difficulties/data limitations

- 10.1 The Sustainability Appraisal process provides a useful tool in identifying issues and suggesting possible forms of mitigation. It tests the performance and robustness of policies against the Council's sustainability objectives. However, there are a number of uncertainties and limitations that exist in the sustainability appraisal process, which are summarised below:

- § The principal source of difficulty undertaking the SA is the reliance on the judgement of predicting and assessing effects. However, the SA has been undertaken by a professional with more than 10 years experience in town planning and sustainability issues. In addition the consultants who prepared the SA on the Lambeth Core Strategy provided guidance on the process used. Consultation on the SA report also added value to the process through the views of other 'experts' and interested stakeholders to review the effects identified and provide alternative opinions for further scrutiny.
- § Difficulties have been experienced in predicting the impact of the Local Plan in the long term (for example global market uncertainty). This had made it difficult to accurately appraise the sustainability of the policies.
- § Difficulties associated with and distinguishing the influence of the Local Plan and separating it from other external factors. For example whilst specific local conditions such as air quality, carbon emissions or health or education statistics may be getting worse, this may be due to various factors beyond the control of the Local Plan, and the Local Plan itself may still have a positive influence in so far as planning can influence such areas.
- § A further difficulty was deciding how *significant* the effects of the Local Plan are. This is particularly true for sustainability objectives such as health which are influenced by a wide range of factors.

11 Conclusion

- 11.1 Overall, it is considered that the Lambeth Local Plan provides a good spatial and policy framework that is largely in accordance with sustainable development principles. As noted earlier, the SA identified a number of uncertainties. These particularly relate to the effectiveness of environmental policies, and whether or not housing and supporting services and facilities will be developed. However, in general it was found that implementation of the Local Plan is likely to result in significant positive social and economic effects.

Table 7: Summary of SA findings

Score	Timescale	Probability	Permanent or temporary	Indicators to monitor significant and uncertain effects
1. Ensuring safe communities with reduced crime and disorder				
++	Medium term	Likely	Permanent	<ul style="list-style-type: none"> § Percentage of proposals directly incorporating 'Secured by Design', 'Designing Out Crime' and 'Safer Places' principles or receiving Secure by Design accreditation § Recorded crimes per 1,000 households § Resident surveys on perception of crime and level of safety in town centres § Resident surveys on perception of crime and level of safety in public open spaces.
2. Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health				
++	Medium to long term	Likely	Permanent	<ul style="list-style-type: none"> § Annually Updated Infrastructure Schedule § Life expectancy § Deaths from heart disease less than 75 years § Amount of unrestricted open space per 1000 population § Percentage of dwellings achieving Code for Sustainable Homes level 4 or higher and non-residential buildings achieving BREEAM Excellent § Percentage of homelessness in the Borough § Provision of childcare places per 1000 under 5's § New child play spaces created in completed residential developments § Child obesity levels. § Parks with Green Flag Awards
3. 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				
++/?	Public realm improvements – medium term Large scale transport improvements – long term	Likely Funding for public transport capacity improvements uncertain at this stage	Permanent	<ul style="list-style-type: none"> § Index of Multiple Deprivation § Average distance of households and bus stations to health/medical centres § Proximity of new housing developments to services, facilities and employment § Improvement in unrestricted open space per 1000 population § Number of private vehicles owned by residents in the Borough § Gross additional wheelchair accessible homes § Updated Infrastructure Schedule § Walking mode share based on all trips originating within Lambeth - target 32% by 2026 § Cycling mode share based on all trips originating within Lambeth - target 8% by 2026
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands				
?	Medium to long term	Likely although some infrastructure (school places, healthcare, transport) is uncertain at	Permanent with temporary effects until such infrastructure is	<ul style="list-style-type: none"> § Annual update of Infrastructure Programmes Schedule

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		this time	delivered. Also temporary construction effects	
5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion				
+/?	Infrastructure to support growth – long term; otherwise short - medium term	Transport is uncertain, otherwise achievement is likely	Permanent	§ Annual update of infrastructure programmes schedule.
6. Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity				
++/?	Mid- Long term	Likely although delivery of housing in current economic climate / recent trends is uncertain in the short-term	Permanent Temporary construction effects	§ Number of new dwellings permitted § Number of new dwellings completed each year § Number of new affordable dwellings built each year
7. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place				
++/?	Mid–Long term	Likely	Permanent	§ Diversity of resident ethnicity § Resident surveys on satisfaction parks and open spaces § Resident surveys on perception of crime and level of safety in public § Level of population churn § Annual update of Infrastructure Schedule
8. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets				
++/?	Historic and open spaces environments – short term and continuing; redevelopment / public realm medium to long-term as developments complete	Likely	Permanent	§ The number of buildings on the English Heritage Listed Buildings at Risk Register and the risk levels § Number of listed buildings within the Borough § Number of registered parks and gardens § Number of conservation areas with up to date character appraisals § Number of approved Archaeological Assessment Statements § Annual update Infrastructure Schedule
9. 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				
++/?	Walking and cycling short – long term; major transport infrastructure long-	Likely but funding for some major transport infrastructure projects currently uncertain / not secured	Permanent Temporary effects associated with construction	§ Mode of travel, particularly commute to and from work § Number of people who work locally § Walking mode share based on all trips originating within Lambeth - target 32% by 2026 § Cycling mode share based on all trips originating within Lambeth - target 8%

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	term			by 2026 § Annual update of Infrastructure Schedule
10. To conserve and enhance biodiversity and to bring nature closer to people				
++	Short-term and enhancements short-medium term	Likely	Permanent; and temporary construction effects	§ Percentage of development planning approvals that have incorporated new biodiverse open space § Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls) § The achievement of BAP targets § The change in area and condition of BAP habitats/species § The change in area and percentage in positive conservation management of Sites of Importance for Nature Conservation § Percentage of population located in an access to nature deficiency area.
11. 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.				
+/?	Long term	Dependent on delivery of transport infrastructure, district heating networks and viability of sustainability measures in built environment	Temporary construction effects; otherwise permanent	§ Number of buildings built to Code for Sustainable Homes Level 4 and BREEAM excellent or higher § Number of district heating networks in the Borough and dwellings / premises linked to them.
12. 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				
+/?	Medium to long-term	Dependent on viability in implementing water efficiency measures; reducing flood risk is uncertain given high levels of development	Permanent	§ Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems § Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues.
13. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates				
+/?	Long-term in terms of funding and identifying and occupying new sites; short – medium term with regards to bring vacant buildings back in use	Uncertainty on funding for recycling and reuse centre and meeting London Plan apportionment targets.	Temporary construction waste; otherwise permanent in management facilities once delivered, building back in use	§ Annual update of Infrastructure Schedule § Capacity of new waste management facilities § Amount of municipal waste arising and managed by management type
14. To improve air quality				
+/?	Localised efforts to	Likely – localised	Permanent with	§ Percentage of residents with health problems related to air pollution/quality

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	improve air quality – medium term Transport infrastructure delivery and Vauxhall gyratory remodelling – long term	improvements Uncertainty on delivery of new transport infrastructure and improved air quality given previous efforts	ongoing management; and temporary with regards to construction effects	§ Improvement of air quality at the monitoring stations around the Borough § Annual update of Infrastructure Schedule
15. To maximise the education and skills levels of the population				
+/?	Existing schools and community services safeguarded. Short-medium term for up skilling and apprenticeships; Long term for new schools	Likely	Permanent	§ Annual update of Infrastructure Schedule § Number of additional school places provided § Percentage reduction of young people not in education, employment or training
16 & 18. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses; AND Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.				
++/?	Short-term (construction) and long-term as developments occupied	Likely although may be slower to eventuate due to economic recession	Permanent	§ Unemployment rates § Number of businesses registered in the Borough § Number of vacant premises in town centres § Annual update of infrastructure schedule § Total amount of additional employment floor-space, by type § Total amount of employment floor-space on previously developed land, by type § Employment land available, by type (measures the amount and type of employment land in the borough) § Total amount of floor-space for 'town centre uses' § Net additional serviced bedrooms (visitor accommodation)
17. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in landuse through reuse of previously developed land and existing buildings.				
++	Short term and ongoing	Likely	Permanent	§ Number of existing vacant or dilapidated / derelict buildings brought back into use § Number of regeneration projects completed in deprived areas.