

**SUSTAINABILITY APPRAISAL:**  
**Draft LOCAL PLAN FOR LAMBETH**

**NON-TECHNICAL SUMMARY AND FULL REPORT**

**February 2013**



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**NON-TECHNICAL SUMMARY**  
Sustainability Appraisal on Draft Local Plan

February 2013



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## **1. Introduction**

1.1 This Non-Technical Summary summarises the findings of the Sustainability Appraisal (SA) of the Draft Local Plan for the London Borough of Lambeth. Section 39 of the Planning and Compulsory Purchase Act 2004 requires local authorities to undertake a Sustainability Appraisal (SA) for Development Plan Documents and Supplementary Planning Documents. An SA promotes sustainable development through the integration of social, environmental and economic considerations into the preparation of new planning documents.

1.2 The Non-Technical Summary is part of the Sustainability Report for the draft Local Plan. The SA report has been produced alongside the emerging draft Local Plan (prepared under Regulation 25 of the Town and Country Planning Local Development (England) (Amendment) Regulations 2008) in order to provide guidance on its development. The SA Report is available for consultation at the same time as the draft Local Plan to provide the public and statutory bodies with an opportunity to express their opinions on the SA Report and to use it as a reference in commenting on the draft Local Plan. This report presents the key findings to date of the Sustainability Appraisal on the draft Local Plan and provides background and ancillary information as appropriate.

## **2 The Local Plan**

2.1 A new Local Plan for Lambeth is proposed to incorporate 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 will not change (other than factual updating), as they are recently developed and adopted. Accordingly previous SA analysis, including reasonable alternatives on the spatial strategy, spatial vision, strategic objectives and unchanged strategic policies remains relevant. However, a limited number of strategic policy areas in the Core Strategy will be reviewed to ensure compliance with the National Planning Policy Framework (March 2012) and the London Plan 2011 and to reflect recent updates to the council's strategies for housing, economic development and infrastructure delivery, plus new work on Brixton and Vauxhall.

2.2 The Local Plan sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and identifies sites for development within Lambeth to cover the period up to 2027. It is based on the social, economic and environmental objectives of the Lambeth Sustainable Community Strategy together with other important strategic development needs such as employment, retail, leisure, community, public services, transport as well as mitigating and adapting to the effects of climate change. A number of national, regional and local plans have played a role in shaping the Local Plan, for example, NPPF, PPS10, Marmot Review, London Plan, Mayor's Housing Strategy, Mayors Air Quality Strategy, Lambeth Housing Strategy, Lambeth Open Space Strategy and Local Implementation Plan to name but a few.

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 criteria for assessing proposals for student housing such as being part of a mixed use development and linked to a college or university
- At least 60% of units as shops in town centres
- Control number of betting shops, pawn brokers, and money shops in one area
- Outside of Waterloo and Vauxhall control food and drink uses to no more than a quarter of units in heart of town centres

- KIBAs will only be allowed for business and industrial uses and the exception to allow schools is removed
- Prevent new hot food takeaways opening outside of town centres and 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. Therefore, the final version of the Local Plan may be further altered, if appropriate, to maximise benefits, and minimise adverse effects.
- 3.2 Sustainability Appraisals must be conducted in accordance with Government guidance on Sustainability Appraisal, and must meet the requirements of the European Strategic Environmental Assessment Directive. An overview of the method used to undertake the SA on the draft Local Plan is set out below in Table 1.

**Table 1: SA process thus far**

SA Stage A: Setting the context and objectives, establishing the baseline and deciding on scope  
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. Responses from consultation were taken into account in updating the final version Scoping Report which was published in March 2009.

The Scoping Report March 2009 was updated in September 2010 in preparation of producing other Development Plan Documents, in particular Development Management Policies and Site Allocations DPD. The Sustainability Framework was reviewed at this time and was broadly found to remain relevant for the Development Management DPD however; it was considered that the Framework should be adapted for appraising the Site Allocations DPD. Accordingly a different framework (modified significance criteria) was prepared for the appraisal of the Site Allocations DPD. There were also some amendments to sub questions and targets to reflect stakeholder views and updated Mayoral targets.

A joint consultation exercise was carried out on the SA scoping report for the Development Management DPD and the Site Allocations DPD in October and November 2010. Consultation responses were received from the following organisations:

- English Heritage;
- Environment Agency;
- Lambeth Primary Care Trust;
- Coal Authority;
- Highways Agency;
- Lambeth Council ecologist; and
- Lambeth police/community safety

Baseline data and other relevant plans and programmes of the Scoping Report 2010 has been reviewed and updated in the preparation of this SA.

Stage B: Developing and refining alternatives and assessing their effects; and  
Stage C: Preparing the Sustainability Appraisal Report

In 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. Positively, many of the recommendations were incorporated into the Submission Version Core Strategy, demonstrating the meaningful influence the SA has had on plan preparation in Lambeth.

In 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:

- 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 or relevant SPD.

The August 2009 SA Report was submitted with the Submission Version Core Strategy which was adopted in January 2011.



To assist plan development, preliminary SAs were prepared in 2011 on the emerging Development Management DPD and Site Allocations DPD. Recommendations arising from these preliminary SAs have fed into the draft Local Plan that is currently being consulted upon.

This SA Report predicts and evaluates the significant effects of the latest version of the draft Local Plan. It does this by assessing the policies and site allocations of the draft Local Plan, against the Sustainability Objectives. Where appropriate, recommendations have been made to mitigate adverse effects and maximise beneficial effects. The SA Report also includes measures to monitor significant and uncertain effects of implementing the draft Local Plan.

This Sustainability Appraisal has been undertaken by a professional with experience in town planning and sustainability issues.

Stage D: Consulting on the draft Local Plan and SA Report

The SA Report, along with the draft Local Plan are both available for public consultation for 6 weeks from 4 March 2013. The feedback received from this consultation will be considered for the final Local Plan document.

Stage E: Monitoring the significant effects of implementing the Local Plan

The Sustainability Appraisal makes recommendations for how significant and uncertain effects of the draft Local Plan should be monitored.

#### **4 Baseline characteristics of Lambeth**

- 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 eclectic 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 49.14 hectares (2010/11 Annual Monitoring Report).
- 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 identifies key statistics in Lambeth for sustainability topic areas.

**Table 2: Key baseline statistics in Lambeth**

<b>Social</b>	
Crime	<ul style="list-style-type: none"> <li>▪ From 2010 to January 2012 total number of crimes decreased by 5.2 percent to 29,903 total crimes</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>
Health	<ul style="list-style-type: none"> <li>▪ Lambeth fares comparatively worse for health inequalities when compared nationally</li> <li>▪ 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</li> <li>▪ Healthy lifestyle issues still a concern (smoking, obesity, lack of physical activity, alcohol, drug misuse)</li> <li>▪ About 18% of Lambeth households are estimated to be in fuel poverty</li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>▪ Existing transport infrastructure is very well used and over capacity in places</li> <li>▪ Number of school places currently insufficient to meet future demand</li> <li>▪ Insufficient capacity in Lambeth cemeteries to deal with future demand for burials</li> <li>▪ Lambeth has 270 hectares of open space which is about 10% total land area.</li> </ul>
Equality	<ul style="list-style-type: none"> <li>▪ 14<sup>th</sup> most deprived borough in England</li> <li>▪ very diverse constantly evolving Borough ethnically, culturally, socially and economically</li> <li>▪ 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.</li> <li>▪ 55% of Lambeth residents identify themselves as Christian, 6% as Muslim and 33% say they do not have a religion</li> </ul>
Housing	<ul style="list-style-type: none"> <li>▪ 73% of stock is flats</li> <li>▪ Approx 67% households live in rented accommodation; 30% own their own home</li> <li>▪ Urgent need for more affordable housing, especially for families</li> <li>▪ 130,000 households in Lambeth</li> </ul>
Liveability	<ul style="list-style-type: none"> <li>▪ Population churn is at around 22-24% for last few years; about 88% of population remains same each year</li> <li>▪ Some communities feel their neighbourhoods lack stability and that not enough households stay long enough to put down roots.</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>▪ In 2010/11 there were 30 buildings on the Heritage at Risk register</li> </ul>
<b>Environmental</b>	
Biodiversity	<ul style="list-style-type: none"> <li>▪ 10 priority habitats and 7 priority species in Borough</li> <li>▪ 45 Sites of Importance for Nature Conservation; 96% in positive management.</li> </ul>
Carbon emissions	<ul style="list-style-type: none"> <li>▪ Lambeth's total CO<sub>2</sub> emissions within the scope of influence of the Local Authority was 1290.4 kilotonnes CO<sub>2</sub> for 2009</li> <li>▪ Industry and commercial uses accounted for 39%, domestic accounted for 41% and the remaining 20% was attributed to road transport.</li> <li>▪ Lambeth has achieved a 12% per capita reduction in emissions since 2005</li> </ul>
Flood risk	<ul style="list-style-type: none"> <li>▪ Much of north of Borough is within floodzone 3a for 1 in 100 year flooding from Thames</li> <li>▪ Some flood risk around River Wandle</li> </ul>
Water	<ul style="list-style-type: none"> <li>▪ Average household water consumption in 2010/11 was 166.5 litres per person per day</li> </ul>
Waste	<ul style="list-style-type: none"> <li>▪ Total amount of waste arising in Lambeth has continued to decrease periodically</li> <li>▪ Household waste recycled has increased from 10% in 2001/02 to almost 28% 2010/11</li> <li>▪ Current shortfall of 197,417 tonnes per annum between capacity of existing waste sites in Lambeth and London Plan apportionment to 2031</li> </ul>
Air	<ul style="list-style-type: none"> <li>▪ Whole Borough in Area Quality management Area</li> <li>▪ Borough continues to suffer from high levels of fine particles (PM10) and Nitrogen Dioxide</li> </ul>
<b>Economic</b>	
Economy	<ul style="list-style-type: none"> <li>▪ Around 10,000 business in Lambeth of which 75% have fewer than 5 employees</li> <li>▪ Over 99% of businesses in Borough are small and medium enterprises</li> <li>▪ 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%</li> <li>▪ 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%).</li> </ul>
Regeneration	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>

**5 Likely evolution without implementation of the Local Plan**

5.1 It is considered that the management of baseline characteristics of Lambeth are provided for in the current Core Strategy and saved UDP policies. However, there is risk that policies within these documents may be considered 'out-of-date' under the National Planning Policy Framework. Accordingly, in the absence of the draft Local Plan reliance will be had on national and regional policies, and these may not always be appropriate for the local context of Lambeth. For example, as long as development proposals meet the NPPF definition of sustainable development, applications will need to 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. Development granted under the NPPF may not align with the local vision and objectives for Lambeth. Local opportunities for Lambeth would also likely be lost for example in our town centres.

**6 Key sustainability issues**

6.1 The diverse character of Lambeth has given rise to a number of complex spatial issues that have been addressed in the draft Local Plan (see Table 3 below).

**Table 3: Summary of key sustainability issues in Lambeth**

<b>Characteristics</b>	<b>Key sustainability issues</b>
<p><b>Housing</b></p> <ul style="list-style-type: none"> <li>• Access to good housing.</li> <li>• Affordable housing.</li> <li>• Sustainable housing.</li> <li>• Housing mix and types.</li> </ul>	<p>The Borough is required to deliver the London Plan 10 year housing target of 11,950 new dwellings between 2011 and 2021. Affordability is a major challenge in Lambeth where the entry level price for housing is very high in relation to average household income. There is a specific shortage of affordable family sized accommodation, and there are particular shortages of housing suitable for people with extra care needs, mental health needs, learning disabilities, substance misusers and ex-offenders (Housing Needs Assessment Update 2007).</p>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• Increasing jobs, particularly local jobs for local people.</li> <li>• Addressing high rates of child poverty.</li> <li>• Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups.</li> <li>• Tackling barriers to employment. <ul style="list-style-type: none"> <li>▪ London's role in the UK economy.</li> <li>▪ New business development.</li> <li>▪ Business retention.</li> <li>▪ Inward investment.</li> <li>▪ Targeting key economic sectors.</li> <li>▪ School placements</li> </ul> </li> </ul>	<p>There is a need to increase the number and variety of businesses in the Borough and help local residents access those jobs. For the workless population, the barriers to employment and enterprise can include 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, and the lack of space to start businesses from home in very high density housing.</p> <p>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, including through social enterprise.</p> <p>The number of school places in the Borough is currently insufficient to meet future demand, both at secondary and primary level.</p>
<p><b>Environment and Climate Change</b></p> <ul style="list-style-type: none"> <li>▪ Reducing CO2 emissions.</li> <li>▪ Climate change adaptation, including flood risk management</li> <li>▪ Efficient use and management of resources.</li> <li>▪ Efficient use and management of water: addressing increasing demand.</li> <li>▪ Efficient use and management of energy.</li> <li>▪ Efficient management of waste: increasing recycling rates and self sufficiency in waste disposal.</li> <li>▪ Pressure on biodiversity and open spaces.</li> </ul>	<p>Flood risk is a key issue in some parts of the Borough, and the frequency and severity of flood events has the potential to increase as a result of climate change. 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. There is an additional risk of fluvial flooding close to the river Graveney in the south of the Borough. Further risks arise across the Borough from sewer and surface water flooding.</p> <p>Development will 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. Total energy consumption in Lambeth equates to 3.2 per cent of the total energy consumption in London and Lambeth ranks 11th out of the 33 London boroughs. The domestic sector accounts for over half of consumption in the borough and gas is the primary fuel type (82 per cent of total domestic consumption). In relation to levels of energy produced from Combined Heat and Power, Lambeth ranks 24th among all London boroughs. It has been estimated that 32,800 (26%) of Lambeth residents are in fuel poverty.</p>
<p><b>Transport</b></p>	<p>Public Transport provision in the borough is generally good, with 14 overground railway</p>

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<ul style="list-style-type: none"> <li>▪ Good local access to services and facilities.</li> <li>▪ Tackling congestion.</li> <li>▪ Increase public transport accessibility, cycling and walking.</li> </ul>	<p>stations evenly spread throughout the borough and nine underground stations predominantly in the north. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. This situation will worsen with increasing living and working populations. Ultimately this will impact on access to jobs, Lambeth's economic wellbeing and the attractiveness of the borough to investors. There are many bus routes, with major interchanges at Waterloo, Vauxhall and Brixton. Public transport accessibility is good in north and central Lambeth. However, residents in Streatham and Norwood are without direct access to the underground and are dependent on rail and bus connections for their needs. With bus routes tending to be focussed on the main north-south radial routes into central London and a lack of east-west services, some areas of the borough continue to have low levels of accessibility compared to the rest of Lambeth.</p>
<p><b>Equalities and Accessibility</b></p> <ul style="list-style-type: none"> <li>▪ Mixed communities.</li> <li>▪ Cohesive communities.</li> <li>▪ Safe communities.</li> <li>▪ Accessible communities.</li> <li>▪ Meeting the needs of diverse communities.</li> <li>▪ Addressing social inequities.</li> <li>▪ Tackling crime.</li> <li>▪ Tackling terrorism.</li> <li>▪ Addressing fear of crime.</li> </ul>	<p>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.</p> <p>A number of Lambeth's neighbourhoods are currently struggling with 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. Coverage of community facilities is unevenly spread across the Borough, with some neighbourhoods experiencing severe shortages of useable space, while others apparently have too many under-used facilities.</p> <p>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>
<p><b>Health and Well Being</b></p> <ul style="list-style-type: none"> <li>▪ Improving air quality (and meeting EU targets).</li> <li>▪ Addressing health inequalities and the health needs of Lambeth's existing and new residents.</li> <li>▪ Develop healthy communities and help improve and protect the health and well being of residents.'</li> </ul>	<p>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 (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 other 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.</p> <p>Health facilities need to be able to deliver services to the increasing population and should help address the significant health inequalities that currently exist between wards. Access to leisure and recreation facilities needs to be improved for all residents in the Borough, but particularly for those in more deprived neighbourhoods. Crime and anti-social behaviour are a major concern for residents. Reducing crime and perceptions of crime in the built environment will also be important in responding to this key concern.</p>
<p><b>Town centres and Regeneration</b></p> <p>Viable, safe and well managed town centres:</p> <ul style="list-style-type: none"> <li>▪ Brixton</li> <li>▪ Streatham</li> <li>▪ Clapham</li> <li>▪ Stockwell</li> <li>▪ West Norwood / Tulse Hill</li> </ul> <p>Regeneration of Vauxhall and Waterloo Opportunity Areas.</p>	<p>Regeneration of Waterloo and Vauxhall is expected to maximise densities, taking account of local residential amenity and other needs.</p> <p>New shops need to be located in a way that supports rather than undermines Lambeth's existing town centres, and in areas of high public transport accessibility. Maintaining active street frontages and an appropriate mix of ground floor uses are also key issues along with the need to maintain and improve the environment, public realm and community safety.</p> <p>Lambeth's two major centres, Brixton and Streatham, both have significant potential for new commercial and residential development, supported by effective town centre management and contributions to increased public transport infrastructure where required. This will help to secure their future prosperity in the face of major planned retail and leisure expansion at Elephant and Castle and Battersea.</p> <p>Lambeth's local centres and street markets need strong protection given the essential contribution they make to neighbourhoods and communities, to local distinctiveness and to reducing the need to travel.</p>
<p><b>Open Space and Recreation</b></p> <ul style="list-style-type: none"> <li>▪ Better use of open space</li> <li>▪ Biodiversity</li> </ul>	<p>Some areas, particularly in the north of the Borough, have limited access to unrestricted open space. The current ratio of 1.54ha of unrestricted open space per 1000 population is predicted to decrease as a result of population increase and housing growth, given limited opportunities to create major new areas of open space 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>
<p><b>The Built Environment</b></p> <ul style="list-style-type: none"> <li>▪ Location of tall buildings</li> </ul>	<p>The Borough's 62 distinct conservation areas, numerous listed buildings, archaeological priority zones and historic registered parks and gardens are highly</p>

<ul style="list-style-type: none"> <li>▪ Built heritage</li> </ul>	valued and should continue to be protected and/or enhanced. Important strategic and local views need to be protected. There are also valued views to and along the River Thames that may be affected by waterfront development.
<p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>▪ Infrastructure provision, including healthcare services and facilities; and schools</li> </ul>	Lambeth's future housing growth, economic development and environmental sustainability cannot be achieved without a wide array of essential infrastructure provided by a combination of council run services, partner statutory agencies and private sector companies. Some areas of infrastructure provision are particularly critical over the next 15 years because they are already subject to considerable pressure for resources and / or additional land and facilities are required in order to support projected population and economic growth. These include 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 shown in the table below, alongside appraisal prompt questions and targets. 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. This SA Framework has been used to test the spatial strategy and vision, strategic objectives, policies and options for the Draft Local Plan.

**Table 4: Revised Sustainability Objectives and SEA Topic Requirement**

	<b>SA Objective</b>	<b>SEA Topic Requirement</b>
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	Material Assets, Soil

	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.	Population, Material Assets

## 8 Appraisal Findings

8.1 An appraisal has been carried out on the sustainability of the draft Local Plan's policies and site allocations. The spatial strategy and vision and objectives remain unchanged from the adopted Core Strategy, and therefore the results of appraisal work undertaken for the Core Strategy remain relevant. In brief, the following conclusions were made:

### Effects of Local Plan policies and site allocations on SA Objectives

8.2 On the whole, it is considered that the draft 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 draft 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. It is considered that the scale, type and level of development proposed in the draft Local Plan will not give rise to significant adverse effects on biodiversity, landscape, historic environment and natural resources, due to both the protective nature of policies that avoid or mitigate significant adverse effects and the recommendations outlined in the SA to be incorporated into the final version of the Local Plan (which aim to further mitigate uncertainties or adverse effects). Generally, the SA found that the draft Local Plan policies seek to achieve significant positive social and economic effects and avoid or mitigate significant adverse effects. Some uncertainties were identified, and these primarily relate to deliverability of transport infrastructure, housing (particularly in short term), the sustainability of controlling A3, A4, A5 premises outside of primary shopping areas, and also the effects policy ED10 on A2 uses may have on the local economy over a market led approach. However, it is acknowledged that social benefits may outweigh any economic impacts. Environmental uncertainties generally relate to the delivery of high Code for Sustainable Home and BREEAM standards as current policy suggests such standards are only required unless it is not technically feasible or viable to do so; delivery of living roofs and walls; the extent carbon emissions will be reduced in the Borough; the level of obligation to incorporate innovative water efficiency measure; improved air quality; and provision of on-site waste management for all developments.

8.3 However, it is considered that deliverability is the key issue for the draft Local Plan. For example, in the year 2011/12 the housing target was not met by 347 residential units and there were 2150 outstanding unimplemented planning permission for residential units. Also, the draft Local Plan has a heavy reliance on new public transport servicing the Vauxhall Nine Elms Opportunity Area. An extension to the Northern Line is proposed, but funding has not yet been committed. It is unlikely the northern line extension and new tube station 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. Similarly, funding for much needed healthcare and new schools has not yet been identified.

### SA Recommendations

8.4 175 recommendations have been made in this SA and it is considered that these seek to improve the impact of policies on sustainability or mitigate the potential for significant adverse effects. In brief, some of the main recommendations concern the

following areas:

- Interpretation/measurability/clarity of various terms used
- **Housing standards:** at least 10% of units to be wheelchair accessible; provision of external amenity gardens (rather than space); loss of both housing to meet specific needs and loss of hostels and HMOs to be re-provided on site or elsewhere *within the borough*.
- **Economic development:** that policies are amended to ensure evidence is submitted that demonstrates active and continuous marketing evidence over a one year period, and that the site is marketed at an independently assessed market value price by an agent that specialises in commercial land sales; supporting text and clarification added for policy ED4 work-live development; that the Local Plan makes provision for residential above ground floor in town centres regardless of primary shopping areas; review necessity of controlling A3, A4 and A5 uses outside primary shopping areas and in local centres rather than allowing market forces to establish landuse; and hot food takeaways policy should apply within town centres, and reconsideration of replacing hot food takeaway with 'fast food'.
- **Social infrastructure:** marketing evidence as above by an agent specialising in the trade; new and improved community facilities are appropriate for their intended use and *are fully inclusive* and accessible to the community; exceptionally the *loss* (rather than use) of residential accommodation for a nursery or childcare use may be acceptable in certain circumstances; and that new facilities address identified needs spatially, especially regarding health inequalities.
- **Transport:** electric cars are provided for in transport hierarchy; improved and accessible walking conditions for pedestrians *including those with disabilities*; recognition and incorporation of desire lines into policy; cycle changing facilities etc are commensurate with number of cycle parking provided; continuous riverside walk that is wheelchair accessible from the development as well as existing riverside walk and adjoining street pattern; improved surveillance of parking areas; and consideration of ambient air quality at locations of new taxi ranks proposed.
- **Environment:** improved policy framework for living roofs and walls in all development proposals – in particular any new building in open space should include living roof or wall; include gardens as example of open space listed in policy EN1; review of policy EN1(b) to ensure biodiversity in general is protected; food growing areas in all appropriate developments (not just limited to residential); improved Code for Sustainable Homes and BREEAM standards throughout plan period; introduce CEEQUAL assessment tool for public realm and infrastructure projects; higher sustainable construction and design standards in strategic growth areas such as Vauxhall; ensuring flood defences remain in good condition; and provision of on-site waste management facilities into all major development proposals (no exceptions).
- **Quality of Built Environment:** preference for dual aspect residential units and presumption against north facing units; include 'fear of crime' in policy Q3; decommissioned artwork to remain elsewhere in locality rather than elsewhere in the Borough; delivery of net increase of vegetation and trees in new developments; provision for permeable surfaces/paving with respect to hard landscaping features; consideration of including a further criterion to policy so that demolition in Conservation Areas is only permissible where it is demonstrated the building cannot be viably re-used or refurbished for functional / intended use; and review of tall buildings policy.
- **Places and Neighbourhoods:** that policies for Waterloo, Vauxhall, Brixton, Streatham and West Norwood/Tulse Hill in particular, include specific

provision of living roofs and walls and trees in appropriate places; permeable surfaces of all public realm improvements; specific waste management for areas of large redevelopment; recognition that Waterloo and Vauxhall are in high flood risk areas; identify specific locations for tall buildings in Brixton; and review Streatham and West Norwood/Tulse Hill policy approach of seeking car parking appropriate to nature and scale of development.

- **Site Allocations:** include living walls and roof as design considerations in all site allocations; specify low carbon technologies and climate change mitigation and adaptation measures expected for each site; review approach of referring to carbon emissions for some allocations and not others and how this may be interpreted.

8.5 The Sustainability Appraisal has scored the sustainability effects of the draft Local Plan using the symbols shown in Table 5. Table 6 presents the final effects of the plan taking into account SA recommendations.

**Table 5: 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

Mitigation

8.6 Mitigation has been included throughout the SA process and no significant adverse effects are predicted. Accordingly no further mitigation is necessary.

Reasonable Alternatives

8.7 Reasonable alternative approaches have been considered in formulating the draft Local Plan particularly for those policies that differ from adopted Core Strategy policy and some new development management policies, and these are set out in the Topic Papers. These broadly include the following areas: affordable housing, housing mix, student housing, KIBAs, business uses outside KIBAs, railway arches, town centres, night-time economy and food and drinks uses, A2 uses, hot food takeaways near schools, skills and training, schools, food growing spaces, low carbon and energy, and waste management. This SA has appraised the reasonable alternatives identified for these areas, the outcomes of which will feed into the next plan making stages.

8.8 Where there has been no strategic change in approach to adopted Core Strategy policies, no additional work on reasonable alternatives has been undertaken. Rather, reasonable alternatives for these policies were identified and assessed recently as part of the plan making process in adopting the Core Strategy and has been deemed to be consistent with the NPPF. Appraisal of these reasonable alternatives was provided in the Sustainability Appraisal which influenced the adopted Core Strategy and it is considered such assessment remains valid and defensible. Accordingly, where policies have remained unchanged from the Core Strategy, there have been no further assessments of reasonable alternatives.

**9 Designated sites, including European Nature Conservation sites**

9.1 The Council has undertaken a Habitat Regulations Assessment – Screening Analysis on the draft Local Plan 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 on the draft Local Plan did not identify any likely significant adverse effects on any European Site. Similarly it was considered that the draft Local Plan will not have an adverse impact on the integrity of the two sites. Therefore, the Appropriate Assessment stage is not required on the draft Local Plan.

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 draft 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 experience in town planning and sustainability issues. Consultation on the SA report will add 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 identified in respect of predicting the impact of the Local Plan in the long term (for example global market uncertainty), which has further complicated the process of accurately appraising the sustainability of the strategy.
- Difficulties associated with and distinguishing between and separating out the influence of the Local Plan from other external factors. For example whilst the predicted trends for a particular baseline indicator may suggest that the situation is worsening over time (for example air quality or crime or health or education statistics); it may be due to various factors beyond the control of the Local Plan, the Local Plan itself may still have a positive influence in so far as planning can influence such areas.
- A further difficulty was the identification of *significant* effects, in particular with reference to those sustainability objectives that result from a very broad range of interacting factors (for example health and health inequalities).

## **11 Conclusion**

11.1 Overall, it is considered that the draft Local Plan provides a good spatial and policy framework that is largely in accordance with sustainable development principles. The SA found that implementation of the draft Local Plan will likely result in significant positive social and economic effects. Uncertain social and economic effects relate to:

- Design of developments in flood risk areas;
- Preference of controlling A3, A4, A5 uses outside of primary shopping areas (over market led approach), and the relationship of this with policy ED10 which seeks to control A2 uses;
- Economic effect of policy ED10 (A2 uses);
- General continued macro-economic uncertainty, low investor confidence, lack of public funding for new infrastructure investments and a lack of available finance for development
- Deliverability of additional public transport infrastructure and improvements for capacity (for example Northern Line extension, new station at Brixton for East London Line extension, Vauxhall overground capacity improvements and a

replacement for the former Cross River Tram) particularly preceding occupation of developments\*;

- Some site allocations make specific mention of affordable housing and others do not giving rise to uncertainty on the effect of this with respect to policy H2 which should apply to all sites anyway;
- Deliverability of housing completions particularly outside of Opportunity Areas and at least in the short term in the current economic climate; and
- Deliverability of adequate infrastructure, particularly regarding school places, healthcare and district heating networks, especially in Vauxhall\*.

\*Adoption and implementation of CIL may go some way in addressing funding gaps and costs associated with the delivery of infrastructure.

11.2 Environmental uncertainties generally relate to:

- Delivery of higher Code for Sustainable Homes and BREEAM standards;
- Sustainability of engineering and public realm projects in absence of assessment tool (such as CEEQUAL)
- Level of obligation for developers to exceed carbon reduction targets;
- Delivery of district heat network;
- Extent and variety of water efficiency measures implemented to ensure wise water management;
- Future management of waste due to identified funding gap of £500K for a Waste Transfer Station;
- Improvements in air quality being achieved given level of growth proposed and previous efforts in implementing the Air Quality Action Plan not seeing a significant decrease in roadside and kerbside levels of nitrogen dioxide;
- Achieving sustainable development as defined in paragraph 1.2 of the Local Plan specifically 'moving from a net loss of biodiversity to achieving net gains for nature';
- Development of flood risk areas;
- Air quality if additional public transport is not delivered; and
- Construction, implementation and operation of development to minimise adverse environmental effects.

11.3 Recommendations seek to address potential adverse effects and uncertain effects. Key outstanding issues involve deliverability of both the housing and the additional public transport infrastructure which is considered critical to the sustainable development of Opportunity Areas, places and neighbourhoods, and the Borough as a whole.

Table 6: Summary of SA findings

Score	Timescale	Probability	Permanent or temporary	Indicators to monitor significant and uncertain effects
<b>1. Ensuring safe communities with reduced crime and disorder</b>				
++	Medium term	Likely	Permanent	<ul style="list-style-type: none"> <li>▪ Percentage of proposals directly incorporating 'Secured by Design', 'Designing Out Crime' and 'Safer Places' principles or receiving Secure by Design accreditation</li> <li>▪ Recorded crimes per 1,000 households</li> <li>▪ Resident surveys on perception of crime and level of safety in town centres</li> <li>▪ Resident surveys on perception of crime and level of safety in public open spaces.</li> </ul>
<b>2. Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health</b>				
++	Medium to long term	Likely	Permanent	<ul style="list-style-type: none"> <li>▪ Number of planning permissions granted or completed for community, religious, leisure or health facilities in the borough</li> <li>▪ Life expectancy</li> <li>▪ Deaths from heart disease less than 75 years</li> <li>▪ Amount of open space per 1000 population</li> <li>▪ Percentage of dwellings achieving Code for Sustainable Homes level 4 or higher and non-residential buildings achieving BREEAM Excellent</li> <li>▪ Percentage of homelessness in the Borough</li> <li>▪ Provision of childcare places per 1000 under 5's</li> <li>▪ New child play spaces created in completed residential developments</li> </ul>
<b>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</b>				
++/?	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"> <li>▪ Index of Multiple Deprivation</li> <li>▪ Average distance of households and bus stations to health/medical centres</li> <li>▪ Proximity of new housing developments to services, facilities and employment</li> <li>▪ Improvement in access to open space deficiency statistics</li> <li>▪ Number of private vehicles owned by residents in the Borough</li> <li>▪ Gross additional wheelchair accessible homes</li> </ul>
<b>4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands</b>				
++/?	Medium to long term	Likely although some infrastructure (school, healthcare, transport) is uncertain at this time	Permanent with temporary effects until such infrastructure is delivered. Also temporary construction effects	<ul style="list-style-type: none"> <li>▪ Annual update of Infrastructure Programmes Schedule</li> </ul>
<b>5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion</b>				
+/?	Infrastructure to support growth – long term; otherwise short -	Transport is uncertain, otherwise achievement is likely	Permanent	<ul style="list-style-type: none"> <li>▪ Annual update of infrastructure programmes schedule.</li> </ul>

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	medium term			
<b>6. Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity</b>				
++/?	Mid- Long term	Likely although delivery of housing in current economic climate / recent trends is uncertain in the short-term	Permanent  Temporary construction effects	<ul style="list-style-type: none"> <li>▪ Number of new dwellings permitted</li> <li>▪ Number of new dwellings completed each year</li> <li>▪ Number of new affordable dwellings built each year</li> </ul>
<b>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</b>				
++/?	Mid-Long term	Likely	Permanent	<ul style="list-style-type: none"> <li>▪ Diversity of resident ethnicity</li> <li>▪ Resident surveys on satisfaction parks and open spaces</li> <li>▪ Resident surveys on perception of crime and level of safety in public</li> <li>▪ Level of population churn</li> <li>▪ Annual update of Infrastructure Schedule</li> </ul>
<b>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</b>				
++/?	Historic and open spaces environments – short term and continuing; redevelopment / public realm medium to long-term as developments complete	Likely	Permanent	<ul style="list-style-type: none"> <li>▪ The number of buildings on the English Heritage Listed Buildings at Risk Register and the risk levels</li> <li>▪ Number of listed buildings within the Borough</li> <li>▪ Number of registered parks and gardens</li> <li>▪ Number of approved Archaeological Assessment Statements</li> <li>▪ Annual update Infrastructure Schedule</li> </ul>
<b>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</b>				
++/?	Walking and cycling short – long term; major transport infrastructure long-term	Likely but funding for major transport infrastructure currently uncertain	Permanent Temporary effects associated with construction	<ul style="list-style-type: none"> <li>▪ Mode of travel, particularly commute to and from work</li> <li>▪ Number of people who work locally</li> <li>▪ Annual update of Infrastructure Schedule</li> </ul>
<b>10. To conserve and enhance biodiversity and to bring nature closer to people</b>				
++	Short-term and enhancements short-medium term	Likely	Permanent; and temporary construction effects	<ul style="list-style-type: none"> <li>▪ Percentage of development planning approvals that have incorporated new open space</li> <li>▪ Percentage of population located in an open space deficiency area.</li> </ul>
<b>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.</b>				
+/?	Long term	Dependent on delivery of transport infrastructure, district	Temporary construction effects; otherwise	<ul style="list-style-type: none"> <li>▪ Number of buildings built to Code for Sustainable Homes Level 4 and BREEAM excellent</li> <li>▪ Number of district heating networks in the Borough and dwellings / premises</li> </ul>

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		heating networks and viability of sustainability measures in built environment	permanent	linked to them.
<b>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</b>				
+/?	Medium to long-term	Likely although dependent on viability in implementing water efficiency measures; reducing flood risk is uncertain	Permanent	<ul style="list-style-type: none"> <li>Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems</li> </ul>
<b>13. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates</b>				
+/?	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 waste transfer station and increasing capacity of sites to meet London Plan apportionment targets.	Temporary construction waste; otherwise permanent in management facilities once delivered, building back in use	<ul style="list-style-type: none"> <li>Annual update of Infrastructure Schedule</li> </ul>
<b>14. To improve air quality</b>				
+/?	Localised efforts to improve air quality – medium term Transport infrastructure delivery and gyratory remodelling – long term	Likely – localised improvements Uncertainty on delivery of new transport infrastructure and improved air quality given previous efforts	Permanent with ongoing management; and temporary with regards to construction effects	<ul style="list-style-type: none"> <li>Percentage of residents with health problems related to air pollution/quality</li> <li>Improvement of air quality at the monitoring stations around the Borough</li> <li>Annual update of Infrastructure Schedule</li> </ul>
<b>15. To maximise the education and skills levels of the population</b>				
+/?	Existing schools and community services safeguarded. Short-medium term for up skilling and apprenticeships; Long term for new schools	Likely	Permanent	<ul style="list-style-type: none"> <li>Annual update of Infrastructure Schedule</li> <li>Number of additional school places provided</li> <li>Percentage reduction of young people not in education, employment or training</li> </ul>
<b>16 &amp; 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</b>				

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<b>rewarding, well-located and satisfying employment.</b>				
++/?	Short-term (construction) and long-term as developments occupied	Likely although may be slower to eventuate due to economic recession	Permanent	<ul style="list-style-type: none"> <li>▪ Unemployment rates</li> <li>▪ Number of businesses registered in the Borough</li> <li>▪ Number of vacant premises in town centres</li> <li>▪ Annual update of infrastructure schedule</li> </ul>
<b>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.</b>				
++	Short term and ongoing	Likely	Permanent	<ul style="list-style-type: none"> <li>▪ Number of existing vacant or dilapidated / derelict buildings brought back into use</li> <li>▪ Number of regeneration projects completed in deprived areas.</li> </ul>

## 1.0 INTRODUCTION

- 1.0.1 Lambeth Council is currently preparing a new Local Plan. This Local Plan incorporates into one document Core Strategy policy, Development Management Policies and Site Allocations. Work on Lambeth's Local Plan began in January 2008. The first Core Strategy for Lambeth was adopted in January 2011 and this sets out the spatial planning strategy for the Borough. Various factors have since highlighted a need for review of the Core Strategy, including the National Planning Policy Framework and current development pressures. Accordingly elements of the Core Strategy have been reviewed and development management policies as well as site allocations have been incorporated to provide an up-to-date streamlined development plan for the Borough. Once adopted, this will replace the Core Strategy and saved policies of the Lambeth Unitary Development Plan (UDP) in setting out the policies and proposals to guide future growth and development of the Borough.
- 1.0.2 Section 39 of the Planning and Compulsory Purchase Act 2004 requires local authorities to undertake a Sustainability Appraisal (SA) for Development Plan Documents and Supplementary Planning Documents. The EU Directive 2001/42/EC requires the Strategic Environment Assessment (SEA) of the *environmental* effects of certain plans and programmes on the environment. The SA extends the reach of the SEA to incorporate *economic* and *social* issues relevant to the plan or programme. Therefore, this report assesses the environmental, social and economic effects of the draft Local Plan.
- 1.0.3 Government guidance has defined Sustainability Appraisal as:
- "...A systematic and iterative appraisal process, incorporating the requirements of the Strategic Environment Assessment Directive. The main purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of plans, strategies and policies, from the outset of the preparation process, so that decisions can be made that accord with the objectives of sustainable development."* (Office for the Deputy Prime Minister, 2005).
- 1.0.4 This report follows a series of previous iterations of SA in developing the Local Plan. The adopted Core Strategy was subjected to SA during its preparation. This was submitted with the Core Strategy to the Secretary of State and an SA Adoption Statement was prepared upon adoption of the Core Strategy by the Council. The lead up to this included a draft SA Report in April 2009 which was published for consultation alongside the draft Core Strategy. Previous to this an Initial SA was completed in December 2008. That appraisal assessed each Option put forward in the Core Strategy Issues and Options document against the sustainability objectives established through the preparation of the Scoping Report (October 2008), otherwise known as the Sustainability Appraisal Framework. A further Scoping Report was prepared in March 2009 for the Lambeth Core Strategy, Site Allocations and Development Management DPDs. This was later revised in September 2010 and consultation was undertaken in November 2010, responses of which have informed this SA document.
- 1.0.5 A SA is the systematic process undertaken during the preparation phases of a plan or strategy. The process tests the overall plan, including each policy against the sustainability objectives that have been agreed for this purpose. 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. Therefore, the final version of the Local Plan may be further altered, if appropriate, to maximise benefits, and minimise adverse effects as identified in the SA process.
- 1.0.6 The overall aim of the appraisal process is to help ensure that the Lambeth Local Plan makes an effective contribution to the pursuit of 'sustainable development', which is widely defined as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs' (World Commission on Environment and Development, 1987). The UK Government Sustainable Development Strategy (2005) describes the UK

Government's position on sustainable development. The Report details the following five guiding principles to help achieve sustainable development:

Living within environmental limits:	Respecting the limits of the planet's environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.
Ensuring a strong, healthy and just society:	Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all.
Achieving a sustainable economy:	Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised.
Promoting good governance:	Actively promoting effective, participative systems of governance in all levels of society – engaging people's creativity, energy and diversity.
Using sound science responsibly:	Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

1.0.7 More recently, the National Policy Planning Framework 2012 constitutes the Government's view of what sustainable development in England means in practice for the planning system (policies within paragraphs 18 to 219). It covers three dimensions: economic role, social role and environmental role.

#### 1.1 Objectives and Structure of the SA Report

1.1.1 This report encompasses the aims and requirements of SA and the requirements of Strategic Environmental Assessment (SEA) Directive. The report is structured as follows:

**Section 1** has provided background information on the preparation of the draft Local Plan, the purpose of an SA Report and the supporting legislative requirements.

**Section 2 – Lambeth Local Plan** outlines the documents that make up the Local Plan and describes in more detail the Plan being appraised.

**Section 3 – SA/SEA Methodology** describes the SA process including the SEA requirements, consultation conducted, the SA objectives used to appraise the draft Local Plan, and the difficulties encountered.

**Section 4 – Characterisation and SA framework** provides an overview of the character of Lambeth Borough and describes the process for developing the SA framework against which the draft Local Plan was assessed.

**Section 5 – Appraisal of the Local Plan** is the most noteworthy section of this report. Despite no changes proposed for the Plan objectives, and that the objectives have already been appraised in the SA on the Core Strategy; for totality the objectives have again been assessed for compatibility against the SA objectives set out in the framework section. Following this, the draft Local Plan as a whole is assessed against SA objective. The assessment involves consideration of the following:

- National, regional, and local level guidance and policy;



- Baseline conditions, existing issues, and likely evolution without the Plan;
- Likely significant effects of implementing the draft Local Plan policies and Site Allocations as a whole, taking into account mitigation; and
- Recommendations for monitoring significant and uncertain effects.

**Section 6 – Summary and Conclusions** provides a summary of the draft Local Plan, the predicted significant sustainability effects, and an overview concluding analysis of the main issues of concern in the draft Local Plan.

## 1.2 Equality Impact Assessment

1.2.1 It is also important that the SA adequately addresses equality and diversity issues. The Council has an adopted approach to undertaking Equality Impact Assessments (EqIA) and this SA seeks to integrate the principles of the EqIA across the SA Framework. This helps to explore the impact of the proposed policy/option/site allocation on different equalities groups, (ie. race, gender, disabilities, lesbian/gay/bisexual/transgender, age, faith communities etc). For example, whilst SA Objective 5 specifically addresses issues of equality and diversity, other objectives also tease out equality impacts via appropriate sub questions.

## 1.3 Health and Well-being Impact

1.3.1 As with the EqIA, the Health and Well-being Impact Assessment is integrated into the SA and this approach was discussed and agreed with NHS Lambeth. In addition, NHS Lambeth has been closely involved in the preparation of the SA by providing current health statistics for the Borough and up-to-date guidance and documents on public health. They were also engaged in the preparation of the draft Local Plan.

## 1.4 Habitat Regulations Assessment

1.4.1 The Council has undertaken a Habitat Regulations Assessment – Screening Analysis on the draft Local Plan as required under European legislation. No European Sites lie wholly or partly within Lambeth Borough. Four European Sites (Wimbledon Common SAC, Richmond Park SAC, Walthamstow Reservoirs and Epping Forest (extreme southern tip only) lie partially within 15 kilometres of the Lambeth Borough boundary. The screening assessment on the draft Local Plan did not identify any likely significant adverse effects on any European Site. Similarly it was considered that the draft Local Plan will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the draft Local Plan.

## 2.0 LAMBETH LOCAL PLAN

2.0.1 The procedure for preparation and review of Local Plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. In March 2012, the coalition government published the National Planning Policy Framework (NPPF) which replaces almost all existing national planning policy and guidance. The Local Development Framework (LDF) system remains, but the emphasis in the NPPF is now on each local planning authority (LPA) producing an up-to-date Local Plan for its area. This can comprise existing adopted development plan documents under the LDF system, or can involve the production of a new Local Plan document, depending on the local context. Documents comprising Lambeth's Local Development Documents include:

- Local Plan
- Area Action Plans;
- Proposals Map;
- Supplementary Planning Documents;
- Local Development Scheme;
- Statement of Community Involvement; and
- Annual Monitoring Report.

2.0.2 The draft Local Plan is the primary planning document. It is the foundation Development Plan Document (DPD) with which all other DPDs and Supplementary Planning Documents (SPDs) must be in general conformity. The Core Strategy was the first document the Council produced (in 2011) and to it the Council has now added the Development Management Policies and Site Allocations, to produce the new draft Local Plan. This has the benefit of showing the totality of the policies being proposed. The Council has also taken this opportunity to partially review elements of the Core Strategy. Appendix 2 illustrates that most sections of the Core Strategy are not subject to the review of approach in the development of the new draft Local Plan. Accordingly, previous SA analysis, including reasonable alternatives on the spatial strategy, spatial vision, strategic objectives and most strategic policies remains relevant. There has been factual updating of the strategy, vision, objectives and some policies; however the nature of this is not such that it fundamentally impacts on the policy approach or previous SA / SEA conclusions. The following policies have been subject to a review of approach since the adoption of the Core Strategy 2011:

- Affordable housing
- Gypsies and travellers
- Student housing
- KIBAs
- Loss of B class use outside KIBAs
- Schools on employment land
- Sustainable design and construction (includes targets)
- Vauxhall
- Brixton

2.0.3 Like all DPDs, the Local Plan is a statutory document and will be subject to examination by an independent Inspector. Of particular relevance is the need for the Local Plan to be in general conformity with the London Plan.

2.0.4 The Local Plan sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and identifies sites for development within Lambeth to cover the period up until 2030. It is based on the social, economic and environmental objectives of the Lambeth Sustainable Community Strategy together with other relevant plans, programmes and strategies all of which have implications for the development and land use within the Borough.

- 2.0.5 The spatial framework for future development and land use within the Borough is outlined in the spatial strategy. It sets out the broad locations for delivering sustainable development and enhancement, including new housing and other important strategic development needs such as employment, retail, leisure, community, public services, transport as well as mitigating and adapting to the effects of climate change.

### 3.0 SA/SEA METHODOLOGY

- 3.0.1 This report presents the sustainability appraisal work on the Draft Lambeth Local Plan. It incorporates previous appraisal work on the vision, objectives, spatial strategy and describes the results of this SA on the amended Core Strategy policies, new development management policies and site allocations proposed by the Council in the Draft Local Plan. This process will assist in determining the impact the Local Plan is likely to have on baseline sustainability issues in the Borough.
- 3.0.2 The purpose of the SA is not to identify the best option. It is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response. Therefore, the findings of this SA will feed into the adopted Local Plan thereby making an effective contribution to the provision of 'sustainable development'.
- 3.0.3 This report has been both produced and published for consultation alongside the Draft Local Plan to provide public and statutory bodies with an opportunity to comment on the SA Report and use it as a reference point in commenting on the Draft Local Plan.
- 3.0.4 Table 1 below outlines the process of producing a SA report. All of Stage A (Scoping Report October 2008 with later revisions in March 2009 and September 2010) and Tasks B1 and B2 of Stage B (initial SA Report December 2008) have been completed previously. This SA Report addresses the remaining Tasks in Stage B and Stage C.

**Table 1: SA process and outputs**

<b>STAGES OF THE SA REPORT</b>	<b>Outcome</b>
<p><b>SA Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <ul style="list-style-type: none"> <li>▪ Task A1: Identifying other relevant policies, plans and programmes and sustainability objectives</li> <li>▪ Task A2: Collecting baseline information</li> <li>▪ Task A3: Identifying sustainability information</li> <li>▪ Task A4: Developing the SA framework</li> <li>▪ Task A5: Consulting on the scope of the SA</li> </ul>	<p>Scoping Report (October 2008 and later revisions March 2009 and September 2010)</p>
<p><b>SA Stage B: Developing and refining options and assessing effects</b></p> <ul style="list-style-type: none"> <li>▪ Task B1: Testing the Local Plan objectives against the SA framework</li> <li>▪ Task B2: Developing the Local Plan options</li> <li>▪ Task B3: Predicting the effects of the Local Plan</li> <li>▪ Task B4: Evaluating the effects of the Local Plan</li> <li>▪ Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects</li> <li>▪ Task B6: Proposing measures to monitor the significant effects of implementing the Local Plan</li> </ul>	<p>SA and SEA of London Borough of Lambeth Submission Core Strategy (August 2009)</p> <p>Draft SA &amp; SEA on Development Management Development Plan Document January 2011 (internal purposes only)</p> <p>Draft SA and SEA on Site Allocations DPD January 2011 (internal purposes only)</p> <p>Sustainability Appraisal Report on Draft Local Plan (November 2012)</p>
<p><b>SA Stage C: Preparing the Sustainability Appraisal Report</b></p> <ul style="list-style-type: none"> <li>▪ Task C1: Preparing the SA Report</li> </ul>	<p>Sustainability Appraisal Report</p>
<p><b>SA Stage D: Consulting on the reasonable alternatives of the DPD and SA Report</b></p> <ul style="list-style-type: none"> <li>▪ Task D1: Public participation on the preferred options of the DPD and the SA Report</li> <li>▪ Task D2: Appraising significant changes including those resulting from representations</li> <li>▪ Task D3: Making decisions and providing information</li> </ul>	<p>SA and SEA of London Borough of Lambeth Submission Core Strategy (August 2009)</p>

<p><b>SA Stage E: Monitoring the significant effects of implementing the DPD</b></p> <ul style="list-style-type: none"> <li>▪ Task E1: Finalising aims and methods for monitoring</li> <li>▪ Task E2: Responding to adverse effects</li> </ul>	<p>LDF Annual Monitoring Report</p>
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3.1 Relationship to Strategic Environmental Assessment

3.1.1 The European Directive 2001/42/EC (SEA) requires that Development Plan Documents be subject to a strategic environmental assessment. The purpose of the SEA is to consider the likely significant effects of the Plan on the environment including issues such as population, human health, biodiversity, soil, flora, fauna, water, air, climatic factors, material assets, cultural heritage (including archaeological and built heritage) and landscape.

3.1.2 The requirements of undertaking a Sustainability Appraisal and a Strategic Environmental Assessment are distinct. The objectives of an SEA focus on the environmental effects, whereas SA is concerned with the full range of environmental, social and economic matters. Whilst this is the case government guidance encourages the two appraisals to be undertaken together and as such, this SA report has been written to meet the requirements of the SEA Directive.

3.1.3 Table 2 below sets out the requirements of the SEA Directive and where they are covered in the SA of the Local Plan.

**Table 2: Checklist of SEA requirements contained in the SA Report**

Environmental Report requirements	Section of this Report
a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Sections 2, 5* and Scoping Report 2010 (see Appendix 5)
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 5*
c) the environmental characteristics of areas likely to be significantly affected;	Section 5*
d) 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 (The Birds Directive) and 92/43/EEC (The Habitats Directive);	Section 5*
e) 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;	Section 5*
f) 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;	Section 5*
g) 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*
h) 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;	Section 5*
i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 5*
j) a non-technical summary of the information provided under the above headings.	Non-technical Summary (separate report)

\* These requirements are met for each SA Objective topic within Section 5.

3.2 Consultation and Approach and Influence of SA to date

- 3.2.1 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. Responses from consultation were taken into account in updating the final version Scoping Report which was published in March 2009.
- 3.2.2 In December 2008 a sustainability appraisal was prepared for the Lambeth Core Strategy Issues and Options Report (London Borough of Lambeth, *Preparing the Lambeth Local Development Framework Have Your Say - April 2008 – Core Strategy Issues and Options*). The SA assessed each Option of the Core Strategy Issues and Options document against the sustainability objectives established through the preparation of the Scoping Report. The main environmental, social and economic implications of each Option were identified. This initial SA highlighted that not all policy options deliver environmental, social and economic benefits that are equal to one another, and that the true sustainability of each policy option is highly dependent on how the policy is implemented.
- 3.2.3 In 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. Positively, many of the recommendations were incorporated into the Submission Version Core Strategy, demonstrating the meaningful influence the SA has had on plan preparation in Lambeth.
- 3.2.4 In 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:
- 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 or relevant SPD.
- The August 2009 SA Report was submitted with the Submission Version Core Strategy which was adopted in January 2011.
- 3.2.5 In preparation of Site Allocations, the Council produced an Issues and Options document for consultation in June to August 2009 which contained 114 sites. This was based mainly on sites that were included in the Lambeth Unitary Development Plan 2007 (UDP) as Major Development Opportunity sites. It also included a number of additional sites from the Council's Masterplans prepared for Brixton, Norwood and Streatham town centres. The Issues and Options document set out the existing proposals for the use and development of sites and did not propose any new development options but sought views on potential uses of these sites as well as suggestions for any additional sites and particularly sites that might be suitable for schools, waste, and gypsies and travellers, which the Council urgently requires.
- 3.2.6 The Council consulted widely on this draft, placing a copy of the document in all of the borough's libraries, issuing a press release, placing a notice in the local press, and sending over one thousand letters and questionnaires to individuals, organisations and companies as well as making the document and questionnaire available on the council website. Over 70 responses were received and a schedule of these can be viewed on the Council's website along with the consultation document.
- <http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/SiteSpecificAllocationsDevelopmentPlanDocumentDPDConsultation.htm>
- The nature of responses varied considerably with some expressing detailed views on the exact use of a particular site and others expressing a more general view of the type of development

that would be acceptable. A number of sites were put forward but no sites were proposed for schools, gypsies and travellers, waste or health provision.

- 3.2.7 The Scoping Report March 2009 was updated in September 2010 in preparation of producing other Development Plan Documents, in particular Development Management Policies and Site Allocations DPD. The Sustainability Framework was reviewed at this time and was broadly found to remain relevant for the Development Management DPD however; it was considered that the Framework should be adapted for appraising the Site Allocations DPD. Accordingly a different framework (modified significance criteria) was prepared for the appraisal of the Site Allocations DPD. There were also some amendments to sub questions and targets to reflect stakeholder views and updated Mayoral targets.
- 3.2.8 A joint consultation exercise was carried out on the SA scoping report for the Development Management DPD and the Site Allocations DPD in October and November 2010. Consultation responses were received from the following organisations:
- English Heritage;
  - Environment Agency;
  - Lambeth Primary Care Trust;
  - Coal Authority;
  - Highways Agency;
  - Lambeth Council ecologist; and
  - Lambeth police/community safety
- 3.2.9 Appendix 3 sets out the responses that were received and the action that has been taken as a result.
- 3.2.10 To assist plan development, preliminary SAs were prepared in 2011 on the emerging Development Management DPD and Site Allocations DPD. Recommendations arising from these preliminary SAs have fed into the draft Local Plan that is currently being consulted upon.
- 3.2.11 The Council has since undertaken its own strategic 'sift' of sites which has resulted in the 16 sites now issued for further consultation. The review of sites included identification of sites that can be removed because schemes are under construction or complete; whether the allocation would add value over the Development Management policies. Thus, the criteria refined by the Council which set out the reasonable alternatives for sites to be included in the DPD as:
- over 0.25 hectares
  - need additional direction over and above that which is provided in the Local Plan
  - required for a specific use
- 3.2.12 Baseline data and other relevant plans and programmes of the Scoping Report 2010 has been reviewed and updated in the preparation of this SA. A letter was sent to statutory consultees in August 2012 advising them of the Council's approach to preparing the new Local Plan and the process proposed for SA and revision of the Scoping Report. The Council received no objections or other comments on this proposed approach.
- 3.2.13 Recommendations arising from this SA, as well as consultation responses will influence the pre-submission publication of the Local Plan which is expected to take place from December 2013.
- 3.2.14 This Sustainability Appraisal of the draft Local Plan has been carried out 'in house' by an individual employed for the sole purpose of preparing the SA and Habitat Regulations Assessment. For reasons of impartiality and independence it was considered appropriate for someone outside of the plan making process to undertake the SA.

3.3 Assumptions and Difficulties encountered

3.3.1 Timing and resourcing has been a significant challenge throughout the SA process, in particular the length of time passed between the scoping process to the writing of this report. Measures to address this include a review of the Scoping Report in September 2010, and review of plan, programmes and baseline data in the preparation of this SA.

3.3.2 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 experience in town planning and sustainability issues. Consultation on the SA report will add value to the process by adding value through consideration of other 'experts' and interested stakeholders to review the effects identified and provide alternative opinions for further scrutiny.
- Difficulties have been identified in respect of predicting the impact of the Local Plan in the long term, which has further complicated the process of accurately appraising the sustainability of the strategy.
- Difficulties associated with and distinguishing between and separating out the influence of the Local Plan from other external factors. For example whilst the predicted trends for a particular baseline indicator may suggest that the situation is worsening over time (for example air quality or crime or health or education statistics); it may be due to various factors beyond the control of the Local Plan, the Local Plan itself may still have a positive influence in so far as planning can influence such areas.
- A further difficulty was the identification of *significant* effects, in particular with reference to those sustainability objectives that result from a very broad range of interacting factors (for example health and health inequalities).

3.4 Next Steps

3.4.1 Both the draft Local Plan and this SA Report are available for public consultation for a period of six weeks. Notification of the availability of these documents is in line with the Statement of Community Involvement 2008, the Town and Country Planning Regulations 2012 and the Consultation Plan prepared for the Local Plan process, which has also been subject to Equalities Impact Assessment and scrutiny by the Council's Equalities Panel.



## 4.0 CHARACTERISATION AND SA FRAMEWORK

- 4.0.1 This section provides a brief profile of Lambeth Borough, including an overview of key environmental, social and economic characteristics. The information provided is drawn largely from the Draft Local Plan, 2011 Census data and State of the Borough Report 2011. More detailed information on the Borough is provided as baseline data against the sustainability objectives of the Draft Local Plan policies (see Section 5C).
- 4.0.2 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.
- 4.0.3 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. Heading south this area gives way to the eclectic 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 49.14 hectares (2010/11 Annual Monitoring Report).
- 4.0.4 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.
- 4.0.5 Lambeth is a very diverse Borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is the among the most densely populated local authority in England, with over 11,300 people per km<sup>2</sup>. Lambeth's population is 303,100, which makes it the third largest population in inner London, after Newham (308,000) and Wandsworth (307,000) (Census 2011). The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. The borough is the 14<sup>th</sup> most deprived district in England, comparable with Southwark, Lewisham and Haringey, but less deprived than the most deprived London boroughs of Newham, Tower Hamlets and Hackney. Unemployment is a major barrier to economic prosperity; with an unemployment rate of nine percent as at June 2010, it is comparable to both central London and London as a whole. Most businesses (87%) in the Borough are small and employ up to nine people. Sixty businesses each employ 250 or more people and these 60 business account for 28% employment of all jobs in the borough (Local Economic Assessment 2011).
- 4.0.6 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. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. Access to public transport is good in north and central Lambeth however; residents

in Streatham and West Norwood are dependent on rail and bus connections. As Lambeth has the lowest car ownership rate in London, there is even more reliance on public transport.

4.0.7 The diverse character of Lambeth Borough has given rise to a number of complex spatial issues that have been addressed in the Draft Local Plan (Table 3).

**Table 3: Key Sustainability Issues in Lambeth Borough**

Characteristics	Key sustainability issues
<p><b>Housing</b></p> <ul style="list-style-type: none"> <li>• Access to good housing.</li> <li>• Affordable housing.</li> <li>• Sustainable housing.</li> <li>• Housing mix and types.</li> </ul>	<p>The Borough is required to deliver the London Plan 10 year housing target of 11,950 new dwellings between 2011 and 2021. Affordability is a major challenge in Lambeth where the entry level price for housing is very high in relation to average household income. There is a specific shortage of affordable family sized accommodation, and there are particular shortages of housing suitable for people with extra care needs, mental health needs, learning disabilities, substance misusers and ex-offenders (Housing Needs Assessment Update 2007).</p>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• Increasing jobs, particularly local jobs for local people.</li> <li>• Addressing high rates of child poverty.</li> <li>• Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups.</li> <li>• Tackling barriers to employment. <ul style="list-style-type: none"> <li>▪ London's role in the UK economy.</li> <li>▪ New business development.</li> <li>▪ Business retention.</li> <li>▪ Inward investment.</li> <li>▪ Targeting key economic sectors.</li> <li>▪ School placements</li> </ul> </li> </ul>	<p>There is a need to increase the number and variety of businesses in the Borough and help local residents access those jobs. For the workless population, the barriers to employment and enterprise can include 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, and the 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, including through social enterprise.</p> <p>The number of school places in the Borough is currently insufficient to meet future demand, both at secondary and primary level.</p>
<p><b>Environment and Climate Change</b></p> <ul style="list-style-type: none"> <li>▪ Reducing CO2 emissions.</li> <li>▪ Climate change adaptation, including flood risk management</li> <li>▪ Efficient use and management of resources.</li> <li>▪ Efficient use and management of water: addressing increasing demand.</li> <li>▪ Efficient use and management of energy.</li> <li>▪ Efficient management of waste: increasing recycling rates and self sufficiency in waste disposal.</li> <li>▪ Pressure on biodiversity and open spaces.</li> </ul>	<p>Flood risk is a key issue in some parts of the Borough, and the frequency and severity of flood events has the potential to increase as a result of climate change. 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. There is an additional risk of fluvial flooding close to the river Graveney in the south of the Borough. Further risks arise across the Borough from sewer and surface water flooding.</p> <p>Development will 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. Total energy consumption in Lambeth equates to 3.2 per cent of the total energy consumption in London and Lambeth ranks 11th out of the 33 London boroughs. The domestic sector accounts for over half of consumption in the borough and gas is the primary fuel type (82 per cent of total domestic consumption). In relation to levels of energy produced from Combined Heat and Power, Lambeth ranks 24th among all London boroughs. It has been estimated that 32,800 (26%) of Lambeth residents are in fuel poverty.</p>
<p><b>Transport</b></p> <ul style="list-style-type: none"> <li>▪ Good local access to services and facilities.</li> <li>▪ Tackling congestion.</li> <li>▪ Increase public transport accessibility, cycling and walking.</li> </ul>	<p>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. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. This situation will worsen with increasing living and working populations. Ultimately this will impact on access to jobs, Lambeth's economic wellbeing and the attractiveness of the borough to investors.</p> <p>There are many bus routes, with major interchanges at Waterloo, Vauxhall and Brixton. Public transport accessibility is good in north and central Lambeth. However, residents in Streatham and Norwood are without direct access to the underground and are dependent on rail and bus connections for their needs. With bus routes tending to be focussed on the main north-south radial routes into central London and</p>

	<p>a lack of east-west services, some areas of the borough continue to have low levels of accessibility compared to the rest of Lambeth.</p>
<p><b>Equalities and Accessibility</b></p> <ul style="list-style-type: none"> <li>▪ Mixed communities.</li> <li>▪ Cohesive communities.</li> <li>▪ Safe communities.</li> <li>▪ Accessible communities.</li> <li>▪ Meeting the needs of diverse communities.</li> <li>▪ Addressing social inequities.</li> <li>▪ Tackling crime.</li> <li>▪ Tackling terrorism.</li> <li>▪ Addressing fear of crime.</li> </ul>	<p>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.</p> <p>A number of Lambeth's neighbourhoods are currently struggling with 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. Coverage of community facilities is unevenly spread across the Borough, with some neighbourhoods experiencing severe shortages of useable space, while others apparently have too many under-used facilities.</p> <p>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>
<p><b>Health and Well Being</b></p> <ul style="list-style-type: none"> <li>▪ Improving air quality (and meeting EU targets).</li> <li>▪ Addressing health inequalities and the health needs of Lambeth's existing and new residents.</li> <li>▪ Develop healthy communities and help improve and protect the health and well being of residents.'</li> </ul>	<p>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 (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 other 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.</p> <p>Health facilities need to be able to deliver services to the increasing population and should help address the significant health inequalities that currently exist between wards. Access to leisure and recreation facilities needs to be improved for all residents in the Borough, but particularly for those in more deprived neighbourhoods. Crime and anti-social behaviour are a major concern for residents. Reducing crime and perceptions of crime in the built environment will also be important in responding to this key concern.</p>
<p><b>Town centres and Regeneration</b></p> <p>Viable, safe and well managed town centres:</p> <ul style="list-style-type: none"> <li>▪ Brixton</li> <li>▪ Streatham</li> <li>▪ Clapham</li> <li>▪ Stockwell</li> <li>▪ West Norwood / Tulse Hill</li> </ul> <p>Regeneration of Vauxhall and Waterloo Opportunity Areas.</p>	<p>Regeneration of Waterloo and Vauxhall is expected to maximise densities, taking account of local residential amenity and other needs.</p> <p>New shops need to be located in a way that supports rather than undermines Lambeth's existing town centres, and in areas of high public transport accessibility. Maintaining active street frontages and an appropriate mix of ground floor uses are also key issues along with the need to maintain and improve the environment, public realm and community safety.</p> <p>Lambeth's two major centres, Brixton and Streatham, both have significant potential for new commercial and residential development, supported by effective town centre management and contributions to increased public transport infrastructure where required. This will help to secure their future prosperity in the face of major planned retail and leisure expansion at Elephant and Castle and Battersea.</p> <p>Lambeth's local centres and street markets need strong protection given the essential contribution they make to neighbourhoods and communities, to local distinctiveness and to reducing the need to travel.</p>
<p><b>Open Space and Recreation</b></p> <ul style="list-style-type: none"> <li>▪ Better use of open space</li> <li>▪ Biodiversity</li> </ul>	<p>Some areas, particularly in the north of the Borough, have limited access to unrestricted open space. The current ratio of 1.54ha of unrestricted open space per 1000 population is predicted to decrease as a result of population increase and housing growth, given limited opportunities to create major new areas of open space 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>
<p><b>The Built Environment</b></p> <ul style="list-style-type: none"> <li>▪ Location of tall buildings</li> <li>▪ Built heritage</li> </ul>	<p>The Borough's 62 distinct conservation areas, numerous listed buildings, archaeological priority zones and historic registered parks and gardens are highly valued and should continue to be protected and/or enhanced. Important strategic and local views need to be protected. There are also valued views to and along the River Thames that may be affected by waterfront development.</p>
<p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>▪ Infrastructure provision, including healthcare services and facilities; and schools</li> </ul>	<p>Lambeth's future housing growth, economic development and environmental sustainability cannot be achieved without a wide array of essential infrastructure provided by a combination of council run services, partner statutory agencies and private sector companies.</p> <p>Some areas of infrastructure provision are particularly critical over the next 15 years because they are already subject to considerable pressure for resources and / or additional land and facilities are required in order to support projected population and economic growth. These include public transport, school places, health and social care services, open space, facilities for policing the Borough and waste facilities.</p>

4.1 SA Framework

4.1.1 The SA Framework is shown in table 4 below, alongside appraisal prompt questions and targets. The SA Framework was developed in the Scoping Report and has since been updated in response to consultation comments received (Appendix 3). 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 spatial strategy and vision, strategic objectives, policies and options for the Draft Local Plan.

4.2 Tensions between SA Objectives

4.2.1 While each of the above revised objectives seeks to achieve sustainability in their own right, inevitably it is considered that inherent tensions arise between sustainability objectives seeking to improve economic and social conditions (in other words developmental objectives) and those seeking to protect or improve the natural environment (protective objectives). For example, achievement of Objectives 16 to 18 (economic stimulation) may result in potential tensions with objectives 10 to 14 (environmental protection). However the nature of sustainable development requires a holistic overall judgement of activities and assessment of effects.

4.2.2 Tensions may also arise between SA Objectives and Local Plan Objectives. These are further explored in Table 5.

**Table 4: Sustainability Objectives**

SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	Will the strategy/policy... <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> <li>• reduce accidental injuries and deaths among young people</li> </ul>		Population

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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
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/policy...</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>	<p>London Plan KPI 6: Reducing Health Inequalities <i>Reduction in the gap between life expectancy at birth of Londoner's living within the 11 Spearhead PCTs vs the 20 remaining PCTs, 2011–2031</i></p>	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.	<p>Will the strategy/policy...</p> <p>Improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel? Including:</p> <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> <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>		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.	<p>Will the strategy/policy...</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>	<p>London Plan KPI 12: Improving the provision of social infrastructure and related services. <i>An increase in the provision of childcare places per 1000 under fives, particularly in Regeneration Areas</i></p> <p><i>School places to match School Role Projections</i> Note: Dependent upon school role projections being made available</p>	Population, Human Health, Material Assets

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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Will the strategy/policy... <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> </ul>	London Plan KPI 11: Increased employment opportunities for those suffering from disadvantage in the employment market  <i>Reduce the gap in unemployment rates between BAME groups and the white population and reduce the gap between lone parents on income support in London vs England &amp; Wales average</i>	Population, Human Health

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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
<p>6. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>Will the strategy/policy...</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>	<p>London Plan KPI 4: Increase the supply of new homes <i>Completion of 33,380 additional homes per year</i></p> <p>London Plan KPI 5: An increased supply of affordable homes <i>Completion of 13,200 additional affordable homes per year (60% social housing, 40% intermediate)</i></p> <p>London Plan borough housing target for Lambeth: 12,550 ten year target or 1,255 per annum.</p> <p>Targets set for Opportunity Areas employment capacity and minimum homes: Vauxhall, Nine Elms, Battersea: 10,000 new homes (could be increased to 16,000 depending on scale of public transport improvements) Waterloo: 1,900</p> <p>Lambeth Sustainable Community Strategy (2008-2020): 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: 480 – 2008/09 550 - 2009/10 570 - 2010/11</p> <p>Lambeth SPD on Sustainable Design and Construction 2008: The Council aspires to BREEAM “Excellent” and seeks “Very Good” as a minimum standard. 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. Note: The SPD is in need of revision and updating.</p>	<p>Population, Human Health, Material Assets</p>

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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
<p>7. Liveability and place. To <u>design</u> and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.</p>	<p>Will the strategy/policy...</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>		<p>Population, Human Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)</p>
<b>ENVIRONMENTAL</b>			
<p>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.'</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>• protect sites, features and areas of historical, archaeological and cultural value/potential and their settings?</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> <li>• identify locations where tall building are acceptable?</li> </ul>	<p>Lambeth Open Space Strategy 2004, later revised 2007 and now currently being further updated recommended that Lambeth should aim to double the number of good quality open spaces in the Borough</p> <p>London Plan KPI 3: Minimise the loss of open space <i>No net loss of open space designated for protection in LDFs due to new development</i></p> <p>London Plan KPI 24: Protecting and improving London's heritage and public realm <i>Reduction in the proportion of buildings at risk as a percentage of the total number of listed buildings in London</i></p>	<p>Landscape, Cultural Heritage (including architectural and archaeological heritage)</p>



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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
<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/policy...</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>London Plan KPI 13: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys (public/private transport modal split) <i>Use of public transport per head grows faster than use of the private car per head</i></p> <p>London Plan KPI 14: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys (zero traffic growth). <i>Zero traffic growth in central and inner London, and traffic growth in outer London reduced to no more than 5 per cent</i></p> <p>London Plan KPI 15: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys (increased bicycle modal share) <i>Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026</i></p> <p>As measured by DfT</p> <p>London Plan KPI 16: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys (increased passenger and freight transport on the Blue Ribbon Network) <i>A 50 per cent increase in passengers and freight transported on the Blue Ribbon Network from 2011–2021</i></p> <p>London Plan KPI 17: Increase in the number of jobs located in areas with high PTAL values <i>Maintain at least 50 per cent of B1 development in PTAL zones 5–6 and at least 90 per cent of B2 and B8 development in Zones 0–2</i></p>	<p>Population</p>
<p>10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.</p>	<p>Will the strategy/policy...</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>• Improve connectivity between wildlife sites?</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>London Plan KPI 18: Protection of biodiversity habitat <i>No net loss of designated Sites of Importance for Nature Conservation</i></p> <p>London Plan targets: (those appropriate to Lambeth's BAP priority habitats): Conserve/Increase by 2020 (on 2008 baseline):</p> <ul style="list-style-type: none"> <li>• 1466 ha/ 10ha acid grassland</li> <li>• 4909ha/ 20ha woodland</li> <li>• Conserve 2,300 ha saltmarsh or mudflat of Tidal Thames;</li> <li>• 599 ha/ 250 ponds &lt;2ha conserved ponds, lakes and reservoirs;</li> <li>• 185 ha conserved and/or enhanced wasteland (equivalent to Lambeth's built environment habitat?)</li> </ul> <p>No more than 120 residential units to be developed on garden land/year</p>	<p>Biodiversity, Flora, Fauna, Landscape, Soil, Water</p>

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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
<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/policy...</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 environmental performance for new and existing buildings?</li> <li>• minimise embedded carbon in new buildings and development?</li> </ul>	<p>London Plan KPI 20: Reduce carbon dioxide emissions through new development <i>For strategic developments achieve zero carbon in residential development by 2016 and zero carbon in all development by 2019</i></p> <p>London Plan KPI 22: Increase in energy generated from renewable sources <i>Production of xxGWh of energy from renewable sources by 2026</i></p> <p>The target will be developed in accordance with a Regional Renewable Energy Assessment in 2010, as required by Office for Renewable Energy Deployment</p> <p>London Plan targets: 60% reduction of CO2 emissions by 2025: (against 1990 base)</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 2008: 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 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</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><i>Note: The SPD is in need of revision and updating.</i></p>	<p>Climatic Factors, Materials Assets</p>

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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
<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>	<p>Will the strategy/policy...</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>	<p>London Plan KPI 23: Improve London's Blue Ribbon Network <i>Restore 15km of rivers 2009–2015</i> London Plan target: Maximum water use target of 105 litres per person per day for residential development. (To be reviewed in light of Code for Sustainable Homes targets, essential standard of 80 litres/ person / day by 2016 at latest). Aim to achieve Greenfield run off from sites through incorporating rainwater harvesting and sustainable drainage.</p> <p>Lambeth SPD on Sustainable Design and Construction 2008: 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>Water, Climatic Factors</p>
<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>	<p>Will the strategy/policy...</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>	<p>London Plan KPI 19: Increase in municipal waste recycled or composted and elimination of waste to landfill by 2031 <i>At least 45 per cent of waste recycled/composted by 2015</i> <i>0 per cent to landfill by 2031</i> London Plan borough apportionment: 342,000 tonnes per annum by 2031 (municipal solid waste and commercial/ industrial waste). Current existing licensed capacity: 11,000 tonnes.</p> <p>Exceed recycling or composting levels in commercial and industrial waste of 70% by 2020 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) (boroughs need to ensure land resources available to implement the above).</p>	<p>Population, Material Assets</p>

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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
14. Air quality. To improve air quality.	<p>Will the strategy/policy...</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>		Air
<b>ECONOMIC</b>			
15. Education and skills. To maximise the education and skills levels of the population.	<p>Will the strategy/policy...</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>		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.	<p>Will the strategy/policy...</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 regeneration?</li> <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>	<p>London Plan KPI 8: Ensure that there is sufficient development capacity in the office market. <i>Stock of office planning permissions to be at least three times the average rate of starts over the previous three years</i></p>	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.	<p>Will the strategy/policy...</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>	<p>London Plan KPI 1: Maximise the proportion of development taking place on previously developed land. <i>Maintain at least 96 per cent of new residential development to be on previously developed land</i> London Plan KPI 2: Optimise the density of residential development <i>Over 95 per cent of development to comply with the housing density location and SRQ matrix</i></p>	Material Assets, Soil

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SA Objective	Appraisal prompt questions and targets	Targets	SEA Topic Requirement
<b>SOCIAL</b>			
<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>Will the strategy/policy...</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>	<p>London Plan KPI 7: Sustaining economic activity <i>Increase in the proportion of working age London residents in employment 2011–2031</i></p> <p>London Plan KPI 9: Ensure that there is sufficient employment land available <i>Release of industrial land to be in line with benchmarks in the Industrial Capacity SPG</i></p> <p>South west sub region of London <i>projected</i> to provide 70,000 more jobs by 2026.</p> <p>Indicative employment capacity set for Opportunity Areas Vauxhall, Nine Elms, Battersea: 15,000 Waterloo: 15,000</p>	<p>Population, Material Assets</p>

## 5.0 LIKELY SIGNIFICANT EFFECTS OF THE DRAFT LOCAL PLAN

5.0.1 This section sets out the significant effects, both positive and negative, identified in the appraisal work on the draft Local Plan objectives, policies, site allocations and reasonable alternatives. The findings start with an appraisal of the draft Local Plan objectives, followed by an appraisal of the Local Plan strategic and development management policies, and site allocations.

5.0.2 The SEA Directive states:

*'an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated'* (Article 5(1)).

### 5.1 Assessing significance

5.1.1 The guidance on SA by the ODPM (2005) does not provide a definitive definition of a significant effect. Rather, the guidance states that 'having identified and described the likely effects of the SPD, an evaluation of their significance needs to be made. When forming a judgement on whether a predicted effect will be significant, LPAs need to consider the probability, duration, frequency and reversibility of the effects, including secondary, cumulative, and synergistic effects. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) need to be considered. The value and vulnerability of certain areas and populations may also influence the appraisal, particularly where thresholds or standards may be exceeded' (ODPM 2005).

## 5A DRAFT LOCAL PLAN OBJECTIVES APPRAISAL

5A.0.1 The strategic objectives set out how the Local Plan vision will be delivered. These strategic objectives underpin the more detailed Local Plan policies; therefore it is necessary to appraise the Local Plan objectives for compatibility with the SA objectives. The Local Plan objectives have not been included in the partial review of the Core Strategy, and accordingly there is no proposal to change the objectives. Therefore, while the objectives will be appraised in this SA (for the purpose of completeness), it is not expected that the appraisal results for objectives will differ from the SA undertaken in August 2009 on the submission version Core Strategy (whereby SA recommendations were addressed). Assessing the relationship between SA objectives and the high level strategic objectives will help identify whether the spatial vision for Lambeth is in accordance with sustainability principles. The results of the assessment are presented in Table 5 (next page).

### Key

✓	Compatible
0	Not related
x	Incompatible
?()	Uncertainty (described below)

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**Table 5: Compatibility of Draft Local Plan Objectives and SA Objectives**

SA objectives →	1. Safety	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	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
Local Plan objectives ↓																		
1. Housing	✓	✓	? (2)	? (3)	✓	✓	✓	? (7)	✓	? (12)	? (16)	? (21)	? (26)	? (31)	✓	✓	✓	✓
2. Economy	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	? (17)	? (22)	? (27)	? (32)	✓	✓	✓	✓
3. Jobs	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	? (18)	? (23)	? (28)	✓	✓	✓	✓	✓
4. CC Mitigation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0/? (29)	✓	✓	✓	✓	✓/?(38)
5. Biodiversity	0	✓	✓	✓	0	0	✓	✓	0	✓	✓	✓	0	✓	0	0	? (36)	0
6. CC Adaptation	✓	✓	0	✓	✓	✓	✓	✓	0	✓	✓	✓	0	✓	0	0	✓	0
7. Infrastructure	✓	✓	✓	✓	✓	✓	✓	? (8)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
8. Transport	✓	✓	✓	✓	✓	0	✓	0	✓	✓	✓	0	0	✓	0	✓	✓	? (39)
9. Schools	0	✓	✓	✓	✓	? (4)	✓	0	✓	? (13)	✓	0	0	✓	✓	✓	✓	✓
10. Health	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	✓	✓	✓	✓	✓
11. Open Space	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	0	0	✓	0
12. Waste	0	? (1)	✓	✓	0	x/? (5)	? (6)	? (9)	✓? (10)	? (14)	? (19)	? (24)	✓	? (33)	0	✓/x?	✓/x?	✓
13. Cohesion	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	0	✓	✓	✓	✓	✓
14. Safety	✓	✓	0	✓	✓	✓	✓	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
17. Opp Areas	✓	✓	✓	✓	✓	✓	✓	✓	? (11)	? (15)	? (20)	? (25)	? (30)	? (34)	✓	✓	✓	✓
18. Arts/ Culture	0	✓	✓	✓	0	0	✓	✓	0	0	0	0	0	0	✓	✓	✓	✓

5A.2 As expected (given the objectives had previously been appraised as part of the Core Strategy process and recommendations of that SA process were addressed), the strategic objectives of the Local Plan are generally compatible with sustainability principles. Table 5 shows that in general the objectives underpinning the draft Local Plan Vision are either compatible or have no relation to the Sustainability Appraisal framework (refer to the Draft Local Plan document for the Local Plan Objectives in full). The only possible areas of incompatibility and/or uncertainty 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 waste 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. Other uncertainties arise mostly in relation to development oriented objectives and their impact on the environmental sustainability objectives. Their impact on environmental sustainability will be dependent on implementation and approaches that seek to avoid or mitigate impacts. The notes below explain the uncertainties (identified by numbers):

**1, 6:** As briefly outlined above sites used for waste management and operational use are within largely residential areas and accordingly effects arising from this operation (such as heavy lorry vehicle use, noise, odour) will need to be carefully managed to respect local amenity and mental, emotional and physical wellbeing of residents. Development management policies should seek to mitigate and manage effects.

**2-3:** Delivery of the 17,925 additional dwellings (minimum) to 2027/28 will need to be located in areas that are accessible to services, jobs, leisure and amenities with appropriate provision of infrastructure to support this growth. Other objectives seek to ensure this is addressed.

**4 -5:** There is possible conflict of supply of land for new schools and ensuring everyone has opportunity for a decent home, and indeed quite enjoyment of that home and protection of local amenity. Noise levels and traffic impacts will need to be carefully managed and considered in the selection and design of new school sites. Similarly, maintenance and operation of waste sites close to residential areas will need to respect amenities enjoyed and expected of residents. Development Management policies will likely address these potential effects.

**7-9:** Accommodating 17,925 additional homes together with necessary infrastructure to support the resultant population growth will likely produce additional pressures on the built and historic environment, both in terms of increased demand for accessibility to historic assets and sites, and in terms of development pressure for land for other uses such as housing, infrastructure or waste.

**10-11:** The success and sustainability for regeneration and renewal projects of Opportunity Areas Waterloo and Vauxhall is largely dependent on increased public transport capacity and managing demand to accommodate additional population growth and use of transport services. Other objectives seek to increase public transport capacity and accessibility although a degree of uncertainty remains in timescales and funding of such public transport improvement projects.

**12–15, 36:** Development pressures for different land-uses including housing, schools, waste sites and regeneration schemes have potential to threaten biodiversity and open spaces, including gardens. Accordingly potential adverse effects should be avoided or mitigated and the Lambeth Biodiversity Action Plan should be used to guide and inform decisions for activities and redevelopment.



**16 – 20:** Growth and development will likely increase carbon emissions. Therefore such development needs to be sustainably designed and constructed to minimise carbon emissions as far as practicable. Development management policies should provide further detail on managing and reducing emissions.

**21-34:** Similar to the above points; development and economic growth in the Borough is likely to have some impact on air quality and natural resources such as soil, land, ecosystems and water. However, it is considered that with adequate policies, these aspects of the natural environment can be managed efficiently taking into account the expected growth assigned to the Borough under the London Plan.

**35, 37:** Maintaining an appropriate supply of land for waste management could potentially restrict the Borough's ability to create prosperity and business growth; however it can also provide opportunity to progress green industries related to waste management. Similarly, competing demands for land will raise questions on whether sites designated for waste management are an efficient use of land which promotes efficient, innovative and multifunctional use of land.

**39:** Improvements to public transport accessibility and capacity needs to also be in the most deprived areas and communities (not just limited to Vauxhall and Waterloo), and in particular improvements to east-west services. Improving such accessibility will help contribute to tackling worklessness.

5A.3 Given the policy approach for the Local Plan objectives remains unchanged from the adopted Core Strategy (that was subject to sustainability appraisals in its formulation); no further recommendations are necessary nor made in this report in relation to the Local Plan objectives.

## **5B SPATIAL STRATEGY AND REASONABLE ALTERNATIVES**

### **5B.0 Issues and Options Paper of Core Strategy**

- 5B 0.1 The Issues and Options Report 2008 prepared for the Core Strategy presented a number of options and reasonable alternatives to the spatial strategy to be pursued, including options for housing, flat conversions, employment, waste management and tall buildings. Further detail of this process, including a summary of the SA results of the broad strategic options is provided in Appendix 4.
- 5B 0.2 As the spatial strategy, vision and objectives remain unchanged from the adopted Core Strategy (see Appendix 2 – review of approach table); the reasonable alternatives and SA/SEA of these also remain relevant and therefore are not repeated in this SA on the draft Local Plan. The final SA and SEA of the London Borough of Lambeth Submission Core Strategy has been reviewed in the preparation of this SA and is available on the Council website, as is the Sustainability Adoption Statement.

### **5B 1 Reasonable Alternatives**

- 5B 1.1 Reasonable alternative approaches have been considered in the draft Local Plan making process for those policies that differ from adopted Core Strategy policy and some new development management policies, and these are set out in the Topic Papers. Each of these are appraised against the sustainability framework in section 5C of this report, and broadly include the following areas: affordable housing, housing mix, housing standards, student housing, housing to meet specific community needs and hostels and HMOs, KIBAs, business uses outside KIBAs, railway arches, town centres, night-time economy and food and drinks uses, A2 uses, hot food takeaways near schools, skills and training, schools, parking, food growing spaces, low carbon and energy, and waste management.
- 5B1.2 Where there has been no strategic change in approach to adopted Core Strategy policies (see Appendix 2), no additional work on reasonable alternatives has been undertaken. Rather, reasonable alternatives for these policies were identified and assessed as part of the plan making process in adopting the Core Strategy. This included appraisal of reasonable alternatives in the Sustainability Appraisal. Accordingly, where policies have remained unchanged from the Core Strategy, there have been no further assessments of reasonable alternatives.
- 5B1.3 For some policies, no reasonable alternatives have been identified (see list overleaf of policies for which no reasonable alternative was identified).

Policies identified as having no reasonable alternative

D1	Delivery and monitoring
D2	Presumption in favour of sustainable development
D3	Infrastructure
D4	Planning obligations
D5	Enforcement
H1	Maximising housing delivery
H6	Housing conversions
H10	Gypsy and traveller needs
ED3	Large offices
ED4	Work-live development
ED11	Loss of retail uses outside town centres
ED12	Visitor attractions, leisure, arts and culture uses
ED14	Markets
S1	Safeguarding existing community facilities
S2	New or improved community facilities
T1	Sustainable travel
T2	Walking
T3	Cycling
T4	Public transport infrastructure
T5	River transport
T6	Assessing impacts of development on transport capacity
T8	Servicing
T9	Mini-cabs, taxis and private hire vehicles
T10	Telecommunications
EN1	Open Space
EN4	Sustainable design and construction
EN5	Flood risk
EN6	Sustainable drainage systems and water management
Q1 – Q27	All Quality of Built Environment policies
PN1 – PN10	All Places and Neighbourhoods policies

## 5C POLICIES AND SITE ALLOCATIONS APPRAISAL

5C.0.1 A common approach to Sustainability Appraisals is to assess policies individually against each of the SA objectives usually in a matrix format. The approach to this SA is to assess the Local Plan as a whole, including the preferred policies and their reasonable alternatives where applicable against each of the 18 SA objectives. In terms of policy assessment; this was considered the most appropriate method as it would be misleading to conclude that an individual policy would have a negative impact on an SA objective when another policy in the Local Plan has been included to ensure such a negative impact is avoided.

5C.0.2 To assist the SA process on the Local Plan policies, it was necessary to first screen them broadly against the SA objectives to determine whether each policy was capable of having any significant effect (either positive or negative) on the attainment of any of the SA objectives. This judgment was based on the subject matter of the policy. This screening process identifies which policies to focus on when appraising the effect of the Local Plan on each of the SA objectives (indicated as shaded cells). The results of the screening exercise are shown in Table 7 and indicate that the achievement of the SA objectives will largely depend on the sustainability and implementation of a variety of Local Plan policies, and that most policies interact with a number of objectives.

5C.0.3 In accordance with the requirements of the SEA Directive and guidance for SAs, the appraisal is structured under the following sub-headings:

- Relevant policy objectives (international, national, regional and local).
- Baseline conditions, existing issues and their likely evolution with the plan.
- Likely significant effects of implementing the Local Plan as a whole, taking into account mitigation.
- Consideration of reasonable alternatives.
- Recommendations for monitoring likely significant effects.

5C.0.4 Relevant policy objectives, baseline conditions and existing issues that are described in the appraisals below offer updated data or particularly pertinent policy objectives to the appraisal work and these act to supplement information provided in the Scoping Reports.

5C.0.5 Where appropriate, recommendations to improve the sustainability performance of policies have been proposed. Appendix 1 provides a table containing all original policies as drafted in the Draft Local Plan, alongside the SA recommended changes.

5C.0.6 The assessment of significant effects of the Local Plan on an SA objective includes expected magnitude and spatial extent, the timescale over which they will have an effect, their likelihood, the impact of cumulative effects and whether the effect will be temporary or permanent. Taking into account the Plan period (up to 2030) the following approach as been adopted for the timescales:

Short term:	First 5 years
Medium term:	5 years to 10 years
Long term:	More than 10 years

5C.0.7 Table 6 summarises the symbols that have been used in the appraisal of the Local Plan to show the significance of likely effects arising from the Local Plan.

**Table 6: Key symbols used in the appraisal**

<b>Symbol</b>	<b>Meaning</b>
++	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

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**Table 7: Screening of Local Plan policies for potential to impact SA objectives**

SA objectives →																		
Local Plan Policies ↓	1. Crime	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	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
D1: Monitoring																		
D2: Presumption																		
D3: Infrastructure																		
D4: Obligations																		
D5: Enforcement																		
H1: Housing growth																		
H2: Affordable housing																		
H3: Existing housing																		
H4: Housing mix																		
H5: Housing standards																		
H6: Housing conversions																		
H7: Student housing																		
H8: Specific comm. needs																		
H9: Hostels and HMOs																		
H10: Gypsy & Traveller																		
ED1: KIBAs																		
ED2: Outside KIBAs																		
ED3: Large scale offices																		
ED4: Work-live devmt																		
ED5: Railway arches																		
ED6: Town centres																		
ED7: Changes of use																		
ED8: Night time economy																		
ED9: Hot food takeaways																		
ED10: A2 uses																		
ED11: Loss of retail																		
ED12: Visitor attractions																		
ED13: Hotels...																		
ED14: Markets																		
ED15: Employ. &																		
S11: Existing comm.																		
S12: New comm. facilities																		
S13: Schools																		
T1: Sustainable travel																		
T2: Walking																		
T3: Cycling																		
T4: Public transport																		
T5: River transport																		
T6: Assessing impacts																		
T7: Parking																		
T8: Servicing																		
T9: Mini-cabs, taxis etc																		
T10: Telecommunications																		
EN1: Open space																		

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SA objectives →																		
Local Plan Policies ↓	1. Crime	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	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
EN2: Food growing																		
EN3: Low carbon & energy																		
EN4: Sust design & constr																		
EN5: Flood risk																		
EN6: SUDs & water																		
EN7: Sust waste mgmt																		
Q1: Access disabled people																		
Q2: Amenity																		
Q3: Comm safety / Crime																		
Q4: Public art																		
Q5: Env Enhancement Strat																		
Q6: Local distinctiveness																		
Q7: Urban design public realm																		
Q8: Urban design new																		
Q9: Design quality																		
Q10: Landscaping																		
Q11: Trees																		
Q12: Alts and extensions																		
Q13: Refuse / recycling																		
Q14: Cycle storage																		
Q15: Devmt in gardens																		
Q16: Boundary treatments																		
Q17: Shop fronts/signage																		
Q18: Advertisements																		
Q19: Historic Env Strategy																		
Q20: Westminster WHS																		
Q21: Stat listed buildings																		
Q22: Registered parks...																		
Q23: Conservation Areas																		
Q24: Undesignated heritage																		
Q25: River Thames																		
Q26: Views																		
Q27: Tall Buildings																		
PN1: Waterloo																		
PN2: Vauxhall																		
PN3: Brixton																		
PN4: Streatham																		
PN5: Clapham																		
PN6: Stockwell																		
PN7: Oval																		
PN8: West Norwood/Tulse																		
PN9: Herne Hill																		
PN10: Loughborough																		

## 5C1.0 CRIME

5C1.0.1 This section of the SA relates to the sustainability performance of the Local Plan against:

- Objective 1: Ensuring safe communities with reduced crime and disorder.

5C1.0.2 The causes of crime and vandalism are complex but it is widely accepted that environmental factors can play a part. The planning system can be instrumental in producing attractive and well-managed environments that can influence the level of criminal activity, anti-social behaviour and perception of crime. To achieve objective 1, plan policies should reduce opportunities to commit crime and engage in antisocial behaviour; help address the fear of crime as well as crime itself; create conditions for communities to develop which will support a reduction in crime and fear of crime; reduce Lambeth's vulnerability to major challenges such as climate change and water shortages; reduce accidental injuries and deaths among young people; and reduce Lambeth's' vulnerability to terrorist action.

### 5C1.1 Relevant policy objectives

#### National Level

5C1.1.1 The *Crime and Disorder Act 1998* imposes a duty on the Council to have regard to the crime and disorder implications of its decisions and the need to do all it reasonably can to prevent crime and disorder in its area.

5C1.1.2 '*Safer Places - The Planning System & Crime Prevention*' 2004 is a guide that encourages greater attention to the principles of crime prevention and to the attributes of safer places.

5C1.1.3 With reference to crime, the *National Planning Policy Framework, 2012* states that planning policies should aim to ensure that developments create safe and accessible environment where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

#### Regional Level

5C1.1.4 *London Plan 2011* policy 7.3 states that development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. The policy provides guidance on designing out crime.

### 5C1.2 Baseline conditions and existing issues

5C1.2.1 Overall, average crime rates within Lambeth are higher than both the England and London averages. Therefore this needs to be addressed, and regeneration in the Borough provides good opportunity to reduce crime and fear of crime.

5C1.2.2 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. Most crime categories mirrored this level of reduction: burglary falling by more than 48%, robbery by more than 39%, theft offences by 36% and criminal damage by nearly 44% (Safer Lambeth Strategic Assessment 2011).

5C1.2.3 At December 2010 Lambeth had the second highest volume of TNOs in our nearest neighbouring family of similar boroughs, behind Southwark. The comparative rate of offending (calculated as the number of offences per 1000 of the population) shows Lambeth to have the eighth highest level of its fifteen most similar boroughs<sup>10</sup>. The 5



most prolific crime categories within those offences were Theft and Handling, Violence against the person, Criminal damage, Burglary and Drugs (Safer Lambeth Strategic Assessment 2011).

- 5C1.2.4 Table 8 shows most recent crime statistics for Lambeth to January 2012. From 2010 to January 2012 total number of crimes decreased by 5.2 percent. However, violence against the person, business robbery increased, as did gun related crime by a small margin. Rapes saw the largest rise of all crimes with a 13.4% increase.

**Table 8: Lambeth Crime Statistics**

<b>LINK</b>	<b>FY 2011 to Jan12 (ytd)</b>	<b>FY 2010 to Jan11 (ytd)</b>	<b>Difference</b>	<b>% Change</b>
Total Crimes	31,451	29,903	1,548	<b>5.2%</b>
Homicide	8	7	1	<b>14.3%</b>
Violence Against the Person (Total)	6,078	6,510	-432	<b>-6.6%</b>
Rape	155	179	-24	<b>-13.4%</b>
Other Sexual Robbery (Total)	295	292	3	<b>1.0%</b>
Robbery (Person)	2645	2271	374	<b>16.5%</b>
Robbery (Business)	2467	2077	390	<b>18.8%</b>
Burglary (Total)	178	194	-16	<b>-8.2%</b>
Burglary Residential	3,253	2,802	451	<b>16.1%</b>
Burglary Non-Residential	2,412	2015	397	<b>19.7%</b>
Gun Enabled Crime	841	787	54	<b>6.9%</b>
Motor Vehicle Crime	181	184	-3	<b>-1.6%</b>
Domestic Crime	3,083	2,989	94	<b>3.1%</b>
Racist Crime	1508	1497	11	<b>0.7%</b>
Homophobic Crime	331	299	32	<b>10.7%</b>
	128	116	12	<b>10.3%</b>

- 5C1.2.5 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. Only 44% of young people report feeling safe after dark. Empty and abandoned housing attracts crime and nuisance issues and contributes to the fear of crime (Housing Strategy 2012). The most recent residents' survey (2012) identified 'safer communities' as one of their three top priorities for the Borough.

- 5C1.2.6 Although crime has reduced considerably in the Borough, gang and gun related crime still remains a concern in Lambeth with recent police estimates stating at least 27 gangs functioning. Gangs are predominately located in the poorest neighbourhoods in the Borough which typically are the large social housing estates such as Stockwell Gardens, Myatts Field, Angell Town and particularly Tulse Hill Estate (Housing Strategy 2012).

### 5C1.3 Likely future evolution without the plan

5C1.3.1 People's perception of crime is a key issue for Lambeth (residents survey 2012) and significant efforts need to be made toward improving the Boroughs overall image as a clean and safe place to work, visit and reside within. Crime is a complex issue that involves multiple lifestyle and socio-economic factors. Addressing these is the target of other organisations, most notably the police and education sectors. Therefore, crime rates may reduce somewhat without the Local Plan.

5C1.3.2 However, the built environment will remain, and this is how the Local Plan can play an instrumental role in reducing crime and fear of crime: by designing and planning out crime, opportunity for crime and fear of crime. In absence of the Local Plan, London Plan policies encourage developers to incorporate 'designing out crime' tool.

### 5C1.4 Assessment of Policies

#### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

5C1.4.1 The main policies relevant to achievement of SA Objective 1 are:

D1 – Delivery and monitoring	EN1 – Open Space
D2 – Presumption in favour of sustainable development	Q3 – Community Safety
D3 – Infrastructure	Q5 – Environment Enhancement Strategies
D4 – Planning obligations	Q7 – Urban design / public realm
H1 – Maximising housing growth	Q8 – Urban design / new development
H3 – Safeguarding existing housing	Q13 – Refuse / recycling storage
H5 – Housing standards	Q14 – Cycle storage
ED5 – Railway arches	Q16 – Boundary treatments
ED8 –Night-time economy and food and drink uses	Q17 – Shop fronts and signage
ED10 – A2 uses	PN1 – Waterloo
SI1 – Safeguarding existing community facilities	PN2 – Vauxhall
SI2 – New or improved community facilities	PN3 – Brixton
SI3 – Schools	PN4 – Streatham
T1 – Sustainable travel	PN5 – Clapham
T2 – Walking	PN6 – Stockwell
T3 – Cycling	PN7 – Oval
T4 – Public transport infrastructure	PN8 – West Norwood / Tulse Hill
T5 – River transport	PN9 - Herne Hill
T6 – Assessing impacts of development on transport capacity	PN10 Loughborough Junction
T7 – Parking	
T9 – Mini-cabs, taxis and private hire vehicles	

5C1.1

#### **Delivery policies D1 – D4**

5C1.4.2 Policies D1- D4 will contribute towards the attainment of SA Objective 1 through working with a range of partners (including police), delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including maximising use of vacant buildings (which can attract anti-social behaviour and create intimidating environments increasing fear of crime). The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth. Section 106 and CIL funding will provide or fund local improvements including those to public realm on community safety, walking and cycling improvements and social infrastructure that all work to reduce crime and fear of crime.

**Housing policies H1, H3, H5**

- 5C1.4.3 A direct effect of Policy H1 maximising housing growth is that increased housing will likely result in increased population growth in the Borough. More people may increase the likelihood of more crime. However, planning policy tools such as CPTED (Crime Prevention through Environmental Design) and 'Safer by Design' can 'design out' crime, and there are other proposed policies that will mitigate the effects of population growth in the aim of reducing and preventing crime and fear of crime. Such policies include community safety and town centre policies including mixed use developments. The Local Plan also supports proposals that would bring back into use long term empty homes and derelict empty homes which helps to create safer communities and reduce crime and disorder as derelict homes and properties can contribute to unsafe environments that attract anti-social behaviour and increase fear of crime. The Housing standards policy makes reference to safety and surveillance by stating that communal gardens should be overlooked by habitable rooms. This has dual benefit of creating a safer environment for children to play in, and also discouraging unsavoury loitering that contributes to fear of crime and unsafe environments.

**Reasonable Alternatives (RA):**

*The RA identified for policy H3 Safeguarding existing housing is to not allow exceptional loss of residential units for nursery or childcare use. It is not considered that this alternative approach results in better or worse effects in terms of SA Objective 1.*

*The RA identified for policy H5 is to produce Lambeth housing standards, adopt London Plan housing standards or use a combination of both (i.e. London Plan for internal standards and Lambeth standards for external standards (as proposed). London Plan housing standards for external open space requires as a minimum less open space than the proposed Lambeth standard and the London Plan standard states open space should 'be overlooked by surrounding development'. It is considered that the proposed Local Plan policy of communal gardens being overlooked by habitable room results in more positive effects with regards to SA Objective 1.*

*No RA are identified for policy H1 Maximising Housing Growth given housing targets are set in the London Plan.*

**Economic and town centre policies ED5, ED8, ED10**

- 5C1.4.4 Left unmanaged railway arches, in particular those that are isolated and/or outside major, district and local centres, can become disused environments that may attract loitering and anti-social behaviour. Policy ED5 seeks to make efficient use of railway arches, and applications affecting arches will need to improve the immediate environment including safety and lighting which will help to reduce opportunity for crime and fear of crime.
- 5C1.4.5 Night time economy uses include food and drink uses, night clubs, live music and/or dance venues and other entertainment activities and if not managed appropriately can result in a fear of crime, increased crime or antisocial behaviour. Policy ED8 states that '*night time and food and drink uses will not be supported where this would result in an unacceptable impact on community safety or the amenity of adjoining residential areas and sensitive uses as a result of: noise, litter, visual intrusion from plant equipment, size and scale of proposal, operating hours, delivery vehicles/services, traffic generation and impact on traffic flow and road safety.* An unacceptable impact on amenity of residential areas may be felt wider than those adjoining sites accommodating the night time and food and drink uses. The spatial extent of 'adjoining residential areas' is unclear in the context of part (b) of the policy. Further, it is noted that part (b) refers to 'unacceptable impact' while part (d) (i) refers to 'unacceptable harm to the amenity of adjoining residential property and the area generally' (emphasis added).

- 5C1.4.6 Although likely to mean schools and religious buildings; no guidance on the definition of 'sensitive uses' has been provided in the supporting text. In this context it may be appropriate to include hospitals and residential care homes as sensitive uses.
- 5C1.4.7 In addition to night time economy uses some town centre uses such as betting shops can also exacerbate crime or loitering. Policy ED10 seeks to manage effects of such uses on amenity and crime levels. It is considered that policy ED10 will result in significant positive effects on SA Objective 1 particularly addressing fear of crime.

**Recommendation 1:** To more effectively meet SA Objective 1 it is recommended that the policy team review policy ED8, in particular the use of the words 'adjoining', 'unacceptable impact' and unacceptable harm'. Suggested review of part (b) of policy ED8 is provided below:

'Night time and food and drink uses will not be supported where this would cause unacceptable harm on community safety or result in an unacceptable impact on the amenity of adjacent residential areas and sensitive uses as a result of...'

The word 'adverse' should be included in the first line of policy ED8: ...'whilst making sure that the adverse impact on local amenity is minimised'. This acknowledges that impacts can also be positive.

**Recommendation 2:** Provide definition for 'sensitive uses' in the supporting text of policy ED8.

**Recommendation 3** that the word 'or' is added to the end of ED10(a)(i)-(iii)

**Reasonable Alternatives (RA)**

*The RA identified for policy ED5 railway arches is to only allow industrial uses and/or car parking in the arches. However the latter would be contrary to other Council policy on discouraging private vehicle car use. In terms of SA Objective 1, it is considered that the proposed policy approach provides more positive effects on crime reduction and fear of crime than these alternative approaches.*

*The RA identified for policy ED8 – Night time economy and food and drink uses would be to apply clause (c) to any major or district centre rather than just Waterloo and Vauxhall Opportunity Areas. This would mean there would be less control on the number of food and drink uses in major and district centres in the Borough. A further RA identified is to allow different percentage thresholds in different parts of the Borough. However this was dismissed as being too difficult/complex and had no supporting evidence base. In terms of SA Objective 1, it is considered that the proposed policy approach is likely to result in more positive effects for the borough overall than the alternative approaches.*

*Similarly, the RA identified for policy ED10 A2 uses is to apply different percentages in different areas of the Borough and/or vary the definition of 'over concentration' (being defined as 25%). Again, these approaches were dismissed as too difficult and there is no supporting evidence base. A further alternative approach is to have a policy specifically on pawn brokers and betting shops. However, these are A2 uses and it would be difficult to enforce particular uses within the A2 use class.*

**Social Infrastructure policies S1, S2, S3**

- 5C1.4.8 It is considered that policies S1, S2 and S3 will result in positive effects with regards to SA Objective 1 as these policies seek to safeguard existing, and provide new community premises which includes health care. Retaining and providing new sports, recreation and education facilities also contributes to providing people, in particular youth, with opportunities to engage in sport and education which can reduce opportunities to engage in antisocial behaviour and promote social cohesion.

**Reasonable Alternatives (RA)**

No RA have been identified for policies S1 and S2 and there have been no change in strategic approach from the adopted Core Strategy with regards to these policies. The RA identified for policy S3 schools is the allow schools in KIBAs. Given the nature of landuses in KIBAs and associated vehicle types that may be present (e.g. heavy lorries) this alternative may increase likelihood of of accidental injuries to school children if schools are permitted in KIBAs particularly if the site is within a larger industrial area or part of the site remains in KIBA use. Therefore, in terms of SA Objective 1, the proposed policy approach likely results in reduced adverse effects than the identified RA.

**Transport policies T1 – T7, T9**

- 5C1.4.9 Policies T1 – T7 will likely result in positive effects in terms of SA Objective 1 as they seek to provide a safer road and traffic environment through use of sustainable travel, and promotion of walking and cycling. Policy T1 provides a road user hierarchy whereby walking and cycling are priorities, and private vehicles are at the bottom of the hierarchy. Walking and cycling will be made safer in the Borough through policies T2 and T3 in particular, and policy T2 seeks to replace existing subways, which can be areas that can feel unsafe to some people. Policy T1 makes provision for development proposals to include measures to reduce the level of danger on roads in the vicinity of the site, where appropriate.
- 5C1.4.10 Policy T5 river transport makes provision for new piers or improvements to existing piers for transport or leisure uses. The policy team may wish to consider safety with respect to clause (c). For example, 'proposals must be in keeping and appropriate to their context and include arrangements for safe maintenance, management and access which will be secured through planning obligations'.
- 5C1.4.11 Policy T6 is on assessing impacts of development on transport capacity and makes good provision for safety with respect to SA Objective 1. All the bullet points in clause (b) of the policy should be addressed in major developments, however this is currently unclear. It is recommended that the word 'and' is added to the end of bullet point three.
- 5C1.4.12 Given motor vehicle crime is quite high in the Borough (compared with other types of crime) it is considered appropriate that outdoor and open parking areas (policy T7 (a)(v)) are well lit and monitored by CCTV where possible. Policy T3 (c) provides for secure cycle parking.
- 5C1.4.13 While policy T9 on mini-cabs, taxis and private hire vehicles does not directly reduce the need for motorised travel; it does reduce the need for private vehicle ownership, and also plays a role in providing safe transport options at night time. Therefore it is considered that policy 9 contributes to attaining SA Objective 1.

**Reasonable Alternatives (RA)**

No RA have been identified for the transport policies except for parking policy T7 whereby the alternative was to devise our own parking standards rather than rely of London Plan parking standards. Any effect of this alternative is considered to be de minimis.

**Open Space**

- 5C1.4.14 Policy EN1 seeks to protect, maintain and improve open spaces (including access. This could lead to a reduction in crime levels by facilitating more activity in these spaces.

**Recommendation 4:** Incorporation of safety aspect to Policy T5(c) as follows:  
'Proposals must be in keeping and appropriate to their context and include arrangements for safe maintenance, management and access which will be secured through planning obligations'

**Recommendation 5:** Policy T6(b) add the word 'and' to the end of bullet point three so it is clear that all elements of clause (b) are required.

**Recommendation 6:** Policy T7 on parking could include reference to parking areas being well lit and monitored by CCTV or passive surveillance to help address motor vehicle crime in the Borough.

**Quality of Built Environment policies Q3, Q5, Q7, Q8, Q13, Q14, Q16, Q17**

- 5C1.4.15 The quality of the built environment policies listed above, in particular policy Q3 community safety, are the design policies most pertinent in achieving SA Objective 1. Policy Q3 is likely to result in significant positive effects in designing out crime and anti-social behaviour and addressing terrorism in terms of design and resilience. While solid roller shutters, and security bars on windows and doors are identified in the supporting text as negative design responses (which contribute increased perceptions to fear of crime in an area); it is considered that this could be more robustly addressed in the policy (in addition to 'secured by design' initiative). Clause (a) (i) could be amended as follows: 'design-out opportunistic crime, anti-social behaviour, and fear of crime in a site-specific manner, based on an understanding of the locality and likely crime and safety issues it presents'. It is noted that policy Q17 states that design for shop fronts should 'not have solid or perforated roller shutters or exposed, externally mounted shutter housings'. However this applies to shop fronts only and the suggested amendment to policy Q3 will apply to the wider environment not falling within the ambit of 'shop fronts'.
- 5C1.4.16 Policy Q5 will likely result in positive effects in addressing crime and fear of crime of areas through enhancement of dilapidated and derelict buildings or spaces and improvement of untidy sites which can accommodate criminal / undesirable activities. However, it is unclear what is meant by the term 'untidy sites' or how an 'untidy site' would be identified / defined (for example does it mean sites with overgrown vegetation, or bordered up sites and/or buildings or outdoor storage of materials?). Clarification in the supporting text on this is recommended.
- 5C1.4.17 Policies Q7 and Q8 provide for the urban design of the public realm and new developments. Overall, it is considered that these policies support the attainment of SA Objective 1 and will likely result in positive effects. In order for policy Q8 to more effectively provide for a safer environment; it is recommended that the word 'adjoining' in clause (viii) is amended to 'adjacent' so that vehicular access, parking and servicing is designed to be well related to the surrounding area, including across the road, rather than limited to areas that are immediately next to or share a common boundary. It is also noted that passive surveillance is difficult in under-crofts and as such, should be discouraged where possible.
- 5C1.4.18 It is noted that policy Q8 refers to 'new development'. It is further noted that elsewhere in the draft Local Plan is use of the terms 'development' and 'proposals'. It is recommended that the policy team review the use of these terms in policies for consistent approach and intended meaning (for example do major refurbishments, alterations, extensions and conversions fall within the ambit of 'development' and/or 'proposals'? It is considered that major refurbishments and conversions would not apply to policy Q8 (policy Q14 supports this interpretation) and therefore there is no

urban design policy that would apply to these types of development. Policy Q12 does relate to building alterations and extensions (does this include major refurbishments / redevelopments?).

- 5C1.4.19 Policy Q14 on cycle storage states that cycle storage should be secure and safe to use which will result in positive effects on SA Objective 1. However, the policy and supporting text seems to suggest that Policy Q14 only applies to residential developments (for example use of term 'large flat conversions' and reference to neighbours). While policy T3 requires provision of secure cycle parking, and showers, changing facilities and lockers in education and employment use developments; other than policy Q14, there is no other policy or guidance for the design of cycle storage. Non residential conversions and refurbishments would not appear to be included in Q14. It is recommended that the policy team review whether cycle storage design policy is required for non-residential developments, conversions, refurbishments.
- 5C1.4.20 It is considered that policies Q16 and Q17 will result in positive effects on SA Objective 1, in particular, a reduced fear of crime. Policy Q16 states that front boundaries in non-residential areas should be open in character rather than solid (increasing visibility and passive surveillance), and solid or perforated roller shutters or exposed, externally mounted shutter housings are not supported for shop fronts. Over time, this will result in feelings of a safer, more attractive environment, and improved visual amenity, thereby contributing to attainment of SA Objective 1.

**Recommendation 7:** Include 'fear of crime to policy Q3 (a)(i) as follows: 'design-out opportunistic crime, anti-social behaviour, and fear of crime in a site-specific manner, based on an understanding of the locality and likely crime and safety issues it presents'.

**Recommendation 8:** Policy Q5 – clarification of what is meant by 'untidy sites'

**Recommendation 9:** For policy Q8 to more effectively provide for a safer environment; it is recommended that the word 'adjoining' in clause (viii) is amended to 'adjacent' so that vehicular access, parking and servicing is designed to be well related to the surrounding area, including across the road.

**Recommendation 10:** Policy Q8 appears to only apply to new developments, and not major refurbishments or conversions, which would also benefit from urban design policy guidance.

**Recommendation 11:** That the policy team review whether provision of cycle storage design policy for non-residential developments, conversions, refurbishments is provided in the draft Local Plan.

**Reasonable Alternatives (RA)**

*No RAs have been identified for the Quality of Built Environment policies.*

**Places and neighbourhoods policies PN1 – PN10**

- 5C1.4.21 In combination with other Local Plan policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN10) should result in positive effects in relation to SA Objective 1. These policies generally seek to provide vitalised, viable mixed use centres that increase activity, reduce the need to travel, and respect and maximise local character. The policies include improvements to public realm and transport infrastructure. Policy PN5 on Clapham supports 'enhancements to the

public realm of the town centre to improve vehicle movement and improve the environment for pedestrians and cyclists'. While improvement to vehicle movement and flow may reduce accidents both to motorists and pedestrians and cyclists; improvements for pedestrians and cyclists should take priority both in terms of better achieving SA Objective 1, and in respecting the road user hierarchy outlined in policy T1. There is some concern that policy PN5 may result in an increase of vehicles in the area, and this should be avoided or minimised as much as possible (although it is acknowledged that main roads do go through town centres).

5C1.4.22 Policies PN4 Streatham and PN8 West Norwood and Tulse Hill state that open space and car parking appropriate to the nature and scale of development will be sought. While it is acknowledged that residents in Streatham and Norwood are without direct access to the underground, are dependent on rail and bus connections for their needs and that bus routes tend to be focussed on the main north-south radial routes into central London with a lack of east-west services; it is considered that actively seeking car parking (in addition to policy T7) does not promote a reduced need of motorised travel. While car parking will be limited to less than the maximum standards in the London Plan (policy T7); it is not considered that promoting vehicles in these centres most effectively meets SA Objective 1 or indeed other SA Objectives such as Objective 2, Objective 9.

5C1.4.23 Similarly, policies PN6 Stockwell and PN7 Oval seek the improvement of traffic and environmental conditions for pedestrians. It is recommended that traffic and environmental conditions are also improved for cyclists as well to help ensure safer communities.

**Recommendation 12:** That the policy team review policy PN5 in respect to its reference to improved vehicle movements.

**Recommendation 13:** That the policy team review the necessity to actively seek car parking in Streatham and West Norwood and Tulse Hill areas, over and above the provision of policy T7.

**Recommendation 14:** Policies PN6 and PN7 should be amended to include an improved environment for cyclists as well as pedestrians.

**Reasonable Alternatives (RA)**

*No RA have been identified for the Quality of Built Environment policies.*

**5C1.5 Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

All sites in Table 10 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 1.

**Table 9: Significance criteria for SA Objective 1: Crime**

Positive	Negative
Contributes positively to: <ul style="list-style-type: none"> <li>• Mixed use developments</li> <li>• Designing out crime</li> <li>• Modal shift away from private car</li> <li>• Includes measures to adapt to climate change</li> </ul>	Poor urban design, promotes mono-use developments and car use. Does not promote safe design.



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**TABLE 10: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 1: CRIME**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- The site is currently part vacant and underdeveloped so the identified preferred use for the expansion of St Thomas's Hospital and replacement of affordable housing brings the site into use again thereby improving amenity of the area and reducing fear of crime.</li> <li>- Retaining Upper Marsh as a through route, providing views through gaps between buildings and fronting onto and creating a clear pattern of streets is considered good mechanisms to design out crime, in addition to relevant Local Plan policies which will also apply to the site.</li> </ul>	<ul style="list-style-type: none"> <li>- No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.</li> <li>- Retention of 10 Royal Street and Holy Trinity Urban Centre for their conservation values may prove challenging in adapting to climate change.</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies.</li> </ul>
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	<ul style="list-style-type: none"> <li>- Emergency and delivery vehicles to have safe access to the site, segregated from pedestrians</li> <li>- Current site has a vacant two storey building so bringing site back into use will reduce crime and any perceptions of crime.</li> <li>- Rooftop play space / MUGA to be suitably enclosed.</li> </ul>	<ul style="list-style-type: none"> <li>- Preferred use of site is single use for Education</li> <li>- School children (as well as pedestrians) should not normally have access to emergency vehicle access and delivery / service areas</li> <li>- No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies.</li> </ul>
3	Vale Street Depot, Vale Street SE27	<ul style="list-style-type: none"> <li>- Preferred use is for education use or housing, retention of the reuse and recycling centre.</li> <li>- Rooftop play space / MUGA to be suitably enclosed.</li> </ul>	<ul style="list-style-type: none"> <li>- No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.</li> <li>- Potential safety issues for children with dual use of site as education and reuse /recycling centre which may result in high traffic movements to and from the site during all hours of the day.</li> <li>- Public transport accessibility is very poor and therefore may result in increased vehicle movements for drop off and pick up at school.</li> </ul>	<ul style="list-style-type: none"> <li>- Early integrated design is recommended for the two different uses to avoid safety issues of the two different land uses on the one site.</li> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- Replacement of a bland 1960s building with mixed use development comprising of office led development, ground floor active frontage uses, residential, and new public open space together with increased permeability to Waterloo</li> </ul>	<ul style="list-style-type: none"> <li>- No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other</li> </ul>

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		Station, improved pedestrian links, streetscape improvements should positively contribute to attaining SA Objective 1. - Public transport accessibility is exceptional	flood risk assessment will be required.	relevant Local Plan policies
5	Shell Centre, 2-8 York Road SE1	- Mixed use employment led development comprising of office, residential including affordable housing, active ground floor frontage uses (retail, cultural, sport, leisure and community facilities including replacement of police facility) together with public realm improvements, improved pedestrian links to Waterloo Station, clear routes and use of shared spaces should positively contribute to attaining SA Objective 1. - Public transport accessibility is exceptional	- No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.	- Flood risk assessment will be required.  - Compliance with other relevant Local Plan policies
6	Waterloo Station, Waterloo Road SE1	- Redevelopment of Waterloo Station seeks to increase capacity which will contribute to climate change adaptation - Mixed use development of the station comprising of ground floor active uses, retail, office and a new city square provides passive surveillance and increased activity to the rail station and will seek to achieve SA Objective 1. - It is considered that the proposed design principles for the site will result in positive effects on SA Objective 1. - Penetration of natural light to concourse level is an effective climate change adaptation measure. - Public transport accessibility is exceptional		- Compliance with other relevant Local Plan policies
7	Cornwall Road Bus Garage, Cornwall Road SE1	- Mixed use development and improvements for cyclists and pedestrians should result in positive effects with respect to SA Objective 1 - Public transport accessibility is exceptional	- Potential safety issues for people and surrounding area if replacement bus garage is provided on the site along with mixed use residential and ground floor active uses - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.	- Flood risk assessment will be required.  - Compliance with other relevant Local Plan policies
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and	- Mix of uses: residential, employment and operational fire station proposed - Public transport accessibility is exceptional - Design features including protection of views, internal publically accessible square should result in positive effects on SA Objective 1.	- No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.	- Flood risk assessment will be required.  - Compliance with other relevant Local Plan policies

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	Southbank House SE11			
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	<ul style="list-style-type: none"> <li>- Preferred use is mixed use development with active frontages at ground floor levels, employment with residential on upper levels, and potential location for a new primary school.</li> <li>- Design features such as dual aspect residential units in block adjacent to the railway viaduct, access route along the viaduct, permeability for pedestrians and cyclists and views between buildings will result in significant positive effects in terms of SA Objective 1.</li> <li>- Public transport accessibility is exceptional</li> </ul>	<ul style="list-style-type: none"> <li>- No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	<ul style="list-style-type: none"> <li>- Preferred use for the site is town centre led mixed use development with employment, community uses and residential on the upper floors with a new linear square connecting through the site and the re-provision of a hostel.</li> <li>- Design features such as dual aspect residential units and improved pedestrian and cycling links and permeability for increased surveillance and simplified road junctions will result in significant positive effects in terms of SA Objective 1.</li> <li>- Public transport accessibility is exceptional</li> </ul>	<ul style="list-style-type: none"> <li>- No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	<ul style="list-style-type: none"> <li>- Preferred use is town centre led mixed use development centred on Bondway and the existing bus station. New High Street proposed onto Bondway with active non-retail uses on Wandsworth Road frontage and residential on the upper floors together with new public realm linkages, pedestrian and cycle improvements will likely result in significant positive effects on SA Objective 1</li> <li>- Public transport accessibility is exceptional</li> <li>- New open spaces and public square proposed.</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk area</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>

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12	Somerleyton Road SW9	<ul style="list-style-type: none"> <li>- Mixed use development</li> <li>- design features including significant gaps between buildings to give views across the site, overlooking, and dual aspect all work to result in significant positive effects on SA Objective 1</li> <li>- the line of plane tree on the grass verge are to be protected with provided climate change adaptation benefits.</li> <li>- Public transport accessibility ranges from moderate to exceptional</li> </ul>	Flood risk area	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>
13	Popes Road SW9	<ul style="list-style-type: none"> <li>- Mixed use development preferred use</li> <li>- Design features included to design out crime</li> <li>- Public transport accessibility is exceptional</li> </ul>	<ul style="list-style-type: none"> <li>- Preferred use is to include town centre car parking</li> <li>-No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>
14	Brixton Central (between the viaducts) SW9	<ul style="list-style-type: none"> <li>- Wide ranging mixed use development preferred (including market support centre, creative and cultural industries hub, recreation uses as well as improvements to Brixton station)</li> <li>- Design features to improve access and permeability through the site</li> <li>- Public transport accessibility is exceptional</li> </ul>	<ul style="list-style-type: none"> <li>-No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>
15	SW2 Enterprise Centre	<ul style="list-style-type: none"> <li>- Mixed use development to include civic uses with outdoor space, additional community facilities, retail, residential and employment floorspace</li> <li>- Public transport accessibility is exceptional</li> </ul>	<ul style="list-style-type: none"> <li>No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a flood risk assessment will be required.</li> </ul>	<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>
16	260 – 367 Norwood Road SE27	<ul style="list-style-type: none"> <li>- Retail led mixed use development</li> <li>- Public transport accessibility is very good</li> <li>- design features include permeability and linkages through the site that can design out crime</li> <li>- provision for a CCHP local energy network within the development</li> </ul>		<ul style="list-style-type: none"> <li>- Flood risk assessment will be required.</li> <li>- Compliance with other relevant Local Plan policies</li> </ul>

**Recommendation:** that site 2 is amended to ensure school children (as well as pedestrians) do not have access to emergency vehicle access and service/delivery areas.

## 5C1.6 Summary of Local Plan policies and site allocations

5C1.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the draft Local Plan policies and site allocations will have a positive effect on existing baseline conditions related to crime and fear of crime

**Table 11: Assessment of effects of draft Local Plan on Crime objective**

Assessment of effects of draft Local Plan on SA objective 1	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
Ensuring safe communities with reduced crime and disorder	+/?	++	<p>Safety and crime are influenced by a wide range of factors, many of which are beyond the remit of a Local Plan. However, to the extent that local planning policy can play a part, it is considered that overall the proposed Local Plan will have significant positive effects on the crime objective provided recommendations are incorporated. This is because of the design controls for developments (such as Secured by Design, and discouragement of roller shutters on shop fronts), rejuvenation and encouragement of activity in town centres, mixed use developments, provision of improved safety for cycle and pedestrians including improved routes and recognition of sufficient social infrastructure to accommodate the projected growth of population. Overall it is considered that the preferred uses and design principles outlined for the 16 sites in the Borough will also result in positive effects in terms of SA Objective 1.</p> <p>Most site allocations promote mixed use development which will help increase activity during day and night resulting in passive surveillance and helping reduce levels of crime and fear of crime. The allocations also promote and encourage development on currently underused or vacant sites in some cases.</p>	Safety measures and crime prevention through environmental design is a well recognised and effective planning tool for addressing crime prevalence and opportunity. Therefore, in so far as planning can control, it is likely that there will be reduced crime, and fear of crime as a result of appropriate design measures being incorporated into developments. The majority of significant positive effects are likely to be evident in the medium to long term as development is delivered.	Permanent

### 5C1.6 Recommendations for monitoring likely significant effects

It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- 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.

## 5C2.0 GOOD HEALTH AND REDUCED HEALTH INEQUALITIES

5C2.0.1 This section of the SA relates to the sustainability performance of the draft Local Plan against:

- Objective 2: Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.

5C2.0.2 The term health inequalities is defined by the UK Government as ‘inequalities in respect of life expectancy or general state of health which are wholly or partly a result of differences in respect of general health determinants’ (GLA Act 2007). For example, those with low socioeconomic status, certain ethnic groups, particular geographical areas, and those with disabilities may have worse health than others. Simply put, it is the uneven distribution of good health.

5C2.0.3 To achieve objective 2, plan policies should protect health and wellbeing; reduce poverty including child poverty; reduce health inequalities; improve mental, emotional and physical health and wellbeing; encourage the development of healthy neighbourhoods; and make walking and cycling more attractive relative to other alternatives.

### 5C2.1 Relevant policy objectives

#### National Level

5C2.1.1 *National Planning Policy Framework 2012* sets out a range of policies that influence good health and health inequalities, including building a strong competitive economy, sustainable transport, wide choice of high quality homes, and conserving and enhancing the natural and historic environments.

5C2.1.2 A recent Government commissioned review (*‘Fair Society, Healthy Lives’ February 2010*) into health inequalities made recommendations that the country strive to give every child the best start in life, provide people with more control over their lives, create fair employment and work for all, ensure healthy standards of living, create healthy and sustainable communities, and strengthen the role of prevention in health services.

5C2.1.3 The recent Local Government Group guide – *Plugging health into planning: evidence and practice 2011* provides practitioners with guidance and evidence on integrating health and spatial planning. The guide covers a range of areas including resident health inequality, obesity road traffic fatalities and injuries, improving mental health and wellbeing as well as practical case studies from around England.

#### Regional Level

5C2.1.4 The policies in the London Plan seek to address the main health issues facing the capital, including mental health, obesity, cardio-vascular and respiratory diseases by seeking to ensure new developments are designed, constructed and managed in ways that improve health and reduce health inequalities.

5C2.1.5 The *Best Practice Guidance on Health Issues in Planning 2007* shows how health inequalities can be tackled through planning policies and proposals, as well as through better partnership working between health and development planning sectors. It defines health as being influenced by many factors. It is not only linked to age, gender and ethnicity, but to wider factors such as education, employment, income, housing, social networks, air and water quality, access to affordable nutritious food, and access to social and public services, including health and social

care. Planners and development professionals should consider health in its broadest sense, including social and psychological elements such as wellbeing and fulfilment, which can be positively influenced by the spatial planning processes.

## 5C2.2 Baseline conditions and existing issues

5C2.2.1 Excess winter deaths are defined by the Office for National Statistics as the difference between the number of deaths during the four winter months (December to March) and the average number of deaths during the preceding autumn (August to November) and the following summer (April to July).

**Table 12: Excess Winter Deaths (EWD) in Lambeth**

	England		London		Lambeth	
	EWD	EWD Index*	EWD	EWD Index	EWD	EWD Index
2004/05	29740	19.6%	3440	20.4%	67	12.34%
2005/06	23740	15.8%	2560	15.6%	110	22.31%
2006/07	22380	15.2%	2070	13%	55	11.32%
2007/08	23290	15.7%	2730	17.4%	64	13.01%
2008/09	34200	23.7%	3800	25%	188	42.8%

[Source: ONS mortality file]

\*EWD Index is excess winter deaths as a proportion of average number of deaths for the period

5C2.2.2 Lambeth fares comparatively worse for health inequalities when compared nationally. Healthy lifestyle issues are still an area of concern (e.g. high smoking prevalence, worsening obesity levels related to poor diets and lack of physical activity, alcohol and drug misuse and child obesity).

5C2.2.3 Lambeth male life expectancy is 77 years compared to the England average of 78.5 years, and Lambeth female life expectancy is 81 year compared to England average of 82.5 years (NHS Lambeth 2012).

5C2.2.4 Coronary heart disease, malignant cancers and respiratory diseases remain the top three causes of death in the Lambeth population (NHS 2012). Hypertension, diabetes, chronic obstructive pulmonary disease and severe mental illness are also major long term conditions impacting health of Lambeth residents. Socio-economic challenges such as unemployment and poor housing result in high rates of child poverty, and social exclusion which subsequently results in poor physical and mental health are indicators of health inequality (NHS Lambeth 2012).

5C2.2.5 The summary of public health priorities are summarised annually through a 'red box' where health priorities are presented with regard to their 'high burden' and 'low burden' as understood through various indices. These priorities are further sub-divided into those that are improving and those that are worsening. The quadrant chart which includes the 'red box' presents indicators based on these criteria (see Figure 1).

5C2.2.6 The 2011 census found that 6.1% of Lambeth residents say their day-to-day activities are limited a lot by long term health problems or disabilities; and a further 6.6% say there day to day activities are limited a little. These figures are both less than those for Inner London and London as a whole. Lambeth is in the top 10% of districts for places where people say they are in a very good health (53%)(Census 2011).

## Lambeth - Red box (2011)

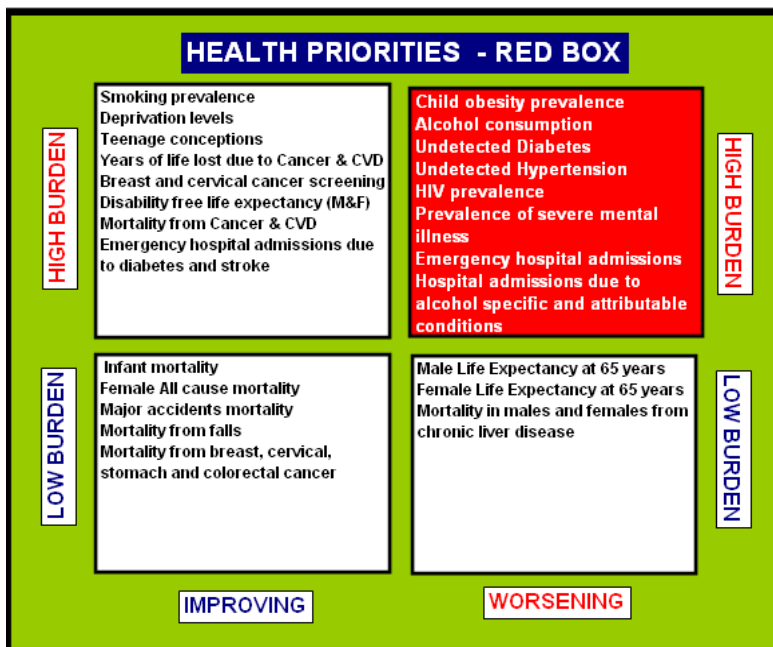


Figure 1: Lambeth Red Box NHS Lambeth 2012

### 5C2.3 Likely future evolution without the Plan

- 5C2.3.1 The government commissioned review ('Fair Society, Healthy Lives' published in February 2010) by Michael Marmot has a number of recommendations on health inequalities. One recommendation is that delivering policy objectives on health will require action by central and local government, the NHS, the third and private sectors and community groups.
- 5C2.3.2 National policies will not work without effective local delivery systems focused on health equity in all policies. If there was no Local Plan document for Lambeth, reliance would fall on policies within the London Plan.
- 5C2.3.3 London Plan policy on health inequality appeals for Boroughs in their LDF preparation to ensure that the health inequalities impact of development is taken into account in light of the Mayor's Best Practice Guidance on Health Issues in Planning.
- 5C2.3.4 The Marmot review also makes the recommendation that local delivery systems should be focused on health equity in all policies.
- 5C2.3.5 In summary health is a complex issue and involves multiple lifestyle and socio-economic factors. Addressing these is the target of many other plans and strategies of competent and experienced organisations. Therefore, such factors and inequalities may improve without the Local Plan. However, planning has an important role to play by ensuring that development does not exacerbate health inequalities, but results in an improved environment for everyone.



## 5C2.4 Assessment of Policies

### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

5C2.4.1 Health is a complex matter and as such, a wide range of factors, relationships and conditions can influence good health and reduce health inequalities. Therefore it is considered that a broad range of policies within the Local Plan may impact on the attainment of improving conditions and services that engender good health and reduce health inequalities. The main policies relevant to achievement of Sustainability Objective 2 are:

D1 – Delivery and monitoring	T5 – River transport
D2 – Presumption in favour of sustainable development	T6 – Assessing impacts of development on transport capacity
D3 – Infrastructure	T10 – Telecommunications
D4 – Planning obligations	EN1 – Open Space
H1 – Maximising housing delivery	EN2 – Local food growing and production
H2 – Delivering affordable housing	EN3 – Low carbon and energy
H3 – Safeguarding existing housing	EN4 – Sustainable design and construction
H4 – Housing mix in new developments	EN5 – Flood risk
H5 – Housing standards	EN7 – Sustainable waste management
H6 – House conversions	Q1 – Inclusive environments
H7 – Student housing	Q2 – Amenity
H8 – Housing to meet specific community needs	Q10 – Landscaping
H9 – Hostels and houses in multiple occupation	Q11 – Trees
H10 – Gypsy and Traveller needs	Q14 – Cycle storage
ED6 – Town centres	Q15 – Development in gardens
ED8 – Night-time economy and food and drink uses	Q25 – River Thames
ED9 – Hot food take-aways near schools	Q26 – Views
ED14 – Markets	PN1 – Waterloo
SI1 – Safeguarding existing community facilities	PN2 – Vauxhall
SI2 – New or improved community facilities	PN3 – Brixton
T1 – Sustainable travel	PN4 – Streatham
T2 – Walking	PN5 – Clapham
T3 – Cycling	PN6 – Stockwell
T4 – Public transport infrastructure	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 – Herne Hill
	PN10 Loughborough Junction

#### ***Delivery and monitoring policies D1 – D4***

5C2.4.2 Policies D1- D4 will contribute towards the attainment of SA Objective 2 through working with a range of partners (including NHS Lambeth), delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including promotion and maintenance of mixed, balanced and diverse communities, and accessible, child friendly environments. The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth and this will benefit health of the Borough. Section 106 funding will provide or fund local improvements such as those to public realm on community safety, walking and cycling improvements, social infrastructure, access to employment opportunities, access to facilities, local food production and growing which each on their own and cumulatively, will likely result in significant positive effects on health and well being in the Borough.

#### ***Housing policies H1 – H10***

5C2.4.3 Research shows the links between housing quality, better welfare and reduced costs to society (Ambrose 2002). Following assessment of policies; it is considered that overall the Housing policies (coupled with other relevant policies such as quality of built environment and environment policies) will generally have significant positive

effects on the achievement of SA Objective 2. Provision and safeguarding of housing, including affordable housing and estate renewal / regeneration will contribute to improved mental, emotional and physical health and wellbeing. The policy should enable greater share of income for access to nutritious food, healthcare and other essentials that promote good health. Residential stability reduces the stress and disruptions associated with frequent or unwanted moves. Affordable housing should be located in areas with good public transport, access to fresh food and local shops, and other community services and facilities. The mix and design required by the residential policies seek to provide and safeguard family sized housing (reducing risk of overcrowding and possible consequential health impacts such as infectious diseases, stress, parasites), provide adequate internal and outdoor space, and provide housing to meet specific community needs to help house more vulnerable people of society. Policies require these types of housing developments as well as hostels and houses in multiple occupation to be suitable for intended users and accessible to public transport, shops, services, community facilities and social networks, all of which will likely result in positive effects on SA Objective 2.

5C2.4.4 Policy H5 Housing standards states that proposals for new residential development, including new build dwellings, conversions and change of use schemes where new dwellings are created, should accord with the principles of good design. It is recommended that 'major refurbishments' is also included in this policy. The policy expects dwellings to be 'designed and built to Lifetime Homes standard and ensure 10 percent of units are wheelchair accessible...' To maximise benefits to SA Objective 2 (and also SA Objectives 3 and 5), it is recommended that this is amended so that *at least* 10 percent are wheelchair accessible.

5C2.4.5 The provision of Lifetime Homes standard enables people to continue to live in their home throughout different stages of their life, including as they become older and more frail. Older people living in large family sized homes may be limited in their opportunity to convert their house to smaller units by policy H6 (house conversions). As a result of this there may be instances where older people cannot continue to live in that same house. However, policy H4 (housing mix) should provide opportunity for people to downsize their home while still remaining in the same community if they so wish. Student housing should be affordable for intended uses. The policy addresses this and should help avoid overcrowding issues and associated impacts.

5C2.4.6 Policy H5 also provides for external amenity space. Some uncertainty arises over whether communal space or communal gardens is required. The supporting text states outdoor amenity space suggesting that this need not be a garden and therefore may be paved or hard landscaped. The policy provides criteria for communal gardens and it is considered that the criteria should be required for all outdoor amenity space, regardless of whether it is garden or not. It is considered that provision of a communal garden would likely result in more positive health benefits than hard paved areas as green spaces have been proven to contribute to improved mental health and safe green space can also reduce family aggression (NHS Lambeth 2012). There would also be benefits for local biodiversity (SA Objective 10). The policy provides for children's play space where developments have potential occupancy of ten or more children, which will provide opportunity for outdoor physical activity for children (a contribution to addressing obesity and sedentary lifestyles) provided these are safe and accessible environments. Good quality housing and play space can be linked to the home learning environment and ultimately educational attainment.

**Recommendation 15:** That policy H5 applies to major refurbishments

**Recommendation 16:** That Policy H5 provides *at least* 10 percent units that are wheelchair accessible.

**Recommendation 17:** That the last word of policy H5 (b) (ii) is amended from 'space' to 'garden' and supporting text is amended to reflect this. Alternatively, the term 'communal gardens' in (b) (ii) could be amended to 'communal space'.

**Reasonable Alternatives (RA):**

*The RA identified for policy H2 Affordable Housing include always requiring affordable housing on site even if this means accepting a lower proportion (based on feasibility); always allowing affordable housing offsite; clearly defined criteria as to when off site would be allowed (proposed approach); and/or payment in lieu in exceptional circumstances to feed into existing stock of affordable housing (proposed approach). There were also alternatives considered relating to the percentage of affordable housing required (i.e. a lower threshold); varying the threshold across the Borough and not requiring affordable housing provision or payment on sites providing less than 10 units. In terms of SA Objective 2 it is considered that varying the percentage threshold for different parts of the Borough or the other alternative of always allowing affordable housing offsite may not result in best effect for mixed communities and therefore could have a detrimental effects on health inequalities and health and wellbeing of residents generally. In addition the Viability Assessment does not support this approach. It is considered that always requiring affordable housing onsite (even if this reduced the amount) limits flexibility of the policy and therefore could have adverse impacts on provision of affordable housing and consequentially adverse mental and physical health of residents to access decent affordable homes. Requiring a lower percentage threshold (for example 30% rather than the proposed 50%) effectively reduces the target for developers and will result in less affordable housing being delivered in the Borough. In the interests of SA Objective 2 it is considered more appropriate to set a higher target and then if necessary negotiate with developers on the most viable scheme proposed for the site.*

*The RA identified for policy H3 Safeguarding existing housing is to not allow exceptional loss of residential units for nursery or childcare use. Provision of local nursery or childcare can help parents with their work/life balance which has beneficial health impacts on parents and families (can help tackle child poverty). It is therefore considered that the alternative of not allowing in exceptional circumstances the loss of residential housing for childcare would likely result in some adverse impacts for local communities with regards to SA Objective 2.*

*The RA for policy H4 housing mix were no percentage targets for affordable housing; and setting percentage targets for market housing. The risk of not setting percentage targets for affordable housing would be that family size may not always be delivered in schemes which would likely result in adverse effects in terms of SA Objective 2. Setting targets for market housing was considered unreasonable by the policy team who consider that such housing should be left to the market to determine. The policy encourages family size housing though and it is considered this is an appropriate approach with regards to SA Objective 2.*

*The RA identified for policy H5 is to produce Lambeth housing standards, adopt London Plan housing standards or use a combination of both (i.e. London Plan for internal standards and Lambeth standards for external standards (as proposed). London Plan housing standards for external open space is lower than the proposed Lambeth standards. With regards to health, it is considered that the higher standards of open space / communal gardens included in the Lambeth standards offer increased likelihood of more beneficial effects with regards to mental, emotional and physical health and wellbeing of all residents, including children and the amount of play space proposed for them in schemes. The conclusion made against SA Objective 1 with respect to overlooking is further endorsed with respect to SA Objective 2.*

*The RA identified for policies H8 (housing to meet specific community needs) and H9 (hostels and houses in multiple occupation) include not resisting the loss of these housing types. In terms of SA Objective 2, this alternative would result in significant adverse impacts on health in the Borough, particularly exacerbating health inequality issues.*

*No RA are identified for policies H1 Maximising Housing Growth, H6 Housing conversions, and H10 Gypsy and Traveller Needs.*

***Economic development policies ED1 – ED3, ED6, ED8, ED9, ED14, ED15***

5C2.4.7 It is considered that one of the biggest influences on peoples health is employment. The draft Local Plan has a number of policies which either directly or indirectly seek to improve the economy of the Borough, get residents working and thereby create conditions that improve health and reduce inequality. Employment has a strong bearing and effect on mental health. Economic development policies (ED1 – ED3 in particular) seek to safeguard existing business use / employment generating land, and this will likely result in positive effects on mental health and wellbeing of local residents as it helps to improve access to local jobs for local people. Improved vitality and viability of town centres (policy ED6) should also result in positive effects on mental health and wellbeing, through employment opportunities, access to services and facilities, and sense of place. Policy ED15 on employment and training seeks to reduce unemployment in the Borough by supporting job opportunities and apprenticeships associated with major developments in the Borough, and provision of employment and training schemes. It is considered that these policies are likely to generate positive secondary effects in relation to health and sense of community identity and civic participation.

5C2.4.8 Policies support the vitality and viability of town centres including shopping, leisure, food and drink, markets and entertainment which all help to maintain community spirit and social interaction and offer local employment opportunities, improving mental and emotional health and wellbeing. Policy ED8 (night time economy and food and drink uses) protects amenity of residential areas and sensitive uses, and impacts on community safety from adverse impacts arising from night time economy (e.g. noise and nuisance). It limits these uses to town centres and the Waterloo and Vauxhall Opportunity Areas. The recommendations made in the assessment against SA Objective 1 are endorsed with respect to SA Objective 2. Policy ED14 on markets provides opportunity for sale of fresh fruit and vegetables and likely increases the accessibility to affordable healthy and varied foods.

5C2.4.9 Policy ED9 seeks to address childhood obesity (in so far as planning can) by limiting hot food takeaways within 400m of a primary or secondary school. However this will not apply to hot food takeaways within town centres. The intent of the policy is commended. However, many schools are close to a boundary of a town centre (according to initial GIS analysis) and therefore a hot food takeaway could still locate in an area of town centre that is close to a school (under the current wording of the policy). Given the size of town centres it is considered that hot food takeaways should locate at least 400m from schools regardless of whether they are within a town centre boundary or not. Detailed GIS analysis of the location of schools relative to town centre boundaries is required to help inform the relevance and applicability of policy ED9 as currently worded. Interestingly, the policy refers to 'hot food takeaway'. This may not include establishments such as McDonalds or KFC which may be argued to fall within A3 class as a restaurant. Similarly, it would not include other ready made and served unhealthy food such as the sale of donuts or ice cream which also contributes to obesity of the population. Perhaps the policy should refer to 'fast food' and provide a definition of this. To achieve more positive effects with reference to SA Objective 2, in so far as planning is able to; it is recommended that hot food takeaways (or fast food outlets) are not supported within 400m of a school regardless of whether it is proposed within a town centre.

**Recommendation 18:** Remove the words 'Outside of town centres' from Policy ED9 and replace 'minimise' with 'contribute to reducing' in the last line of paragraph 6.29. Reconsider use of 'hot food' against 'fast food' and provide enforceable definition.

**Reasonable Alternatives (RA)**

The RA identified for policy ED1 KIBAs included not having any KIBAs; allowing schools in KIBAs; allowing housing in KIBAs; and retaining KIBAs but reviewing boundaries based on the Employment Land Review and removing the exception of schools (as permitted by UDP). In terms of health and particularly the impact employment has on people's health; it is considered important to retain employment generating land in the Borough. Allowing housing in KIBAs gives rise to conflicts in amenities / reverse sensitivity issues / bad neighbour uses which may have adverse impacts on residents' health. It also dilutes the cluster effect of KIBAs and therefore may have a detrimental effect in attracting inward investment and new businesses. Allowing schools in KIBAs may increase risk of road and pedestrian traffic incidents particularly if heavy lorries are in the surrounding KIBA area. There may also be adverse effects on health and well being of children if surrounding KIBAs involve industrial processes (noxious odours, noise, vibration etc).

The RA for policy ED2 Business uses outside of KIBAs is to allow loss of employment generating uses; not have the exception of loss for D1 uses; and increasing the length of time a site must be marketed for B1 use before allowing residential use. In terms of SA Objective 2, it is considered that not controlling loss of employment generating uses would lead to adverse impacts related to health and employment (including child poverty, fuel poverty and mental illness associated with unemployment). In some circumstances it may be beneficial for health and other reason to allow loss of employment generating land use for a local community or cultural use (D1 use) that meets an identified local need. In terms of health it may be more beneficial to extend the length of time for marketing to ensure that the site is no longer suitable for employment generating uses, before allowing residential use into areas previously used for business or industrial uses (B1).

The RA for policy ED6 Town Centres is to not require re-provision on affordable terms for independent shop premises as part of major redevelopments. It is considered that this alternative would likely result in adverse impacts on SA Objective 2 in terms of accessing local food (particularly of different cultures), reduced social cohesion and connectedness of residents to their local centre, and adverse secondary effects associated with loss of local independent businesses.

The RA identified for policy ED8 – Night time economy and food and drink uses would be to apply clause (c) to any major or district centre rather than just Waterloo and Vauxhall Opportunity Areas. This would mean there would be less control on the number of food and drink uses in major and district centres in the Borough. A further RA identified is to allow different percentage thresholds in different parts of the Borough. However this was dismissed as being too difficult/complex and had no supporting evidence base. Another alternative is to allow a higher percentage of food and drink uses on ground floor units in primary shopping areas (i.e. increased from 25% frontages). In terms of SA Objective 2, it is considered that the proposed policy approach is likely to result in more positive effects for the borough overall than the alternative approaches however, in some cases an increase in A3 uses, particularly cafés, might provide a stronger social cohesion in the local community.

For policy ED9 – Hot food takeaways near schools the RA identified were to not have a policy on this issue at all, and to apply it in town centres. In terms of SA Objective 2, it is considered important to control hot food takeaways near schools. Further, the SA has identified that the policy should apply in town centres as most schools are located near to town centres. Similarly, it is considered that town centres are large enough for A5 uses to still locate within town centres but also be at least 400m away from primary or secondary schools. Therefore, in terms of SA Objective 2, it is considered that the RA to apply the policy within town centres would result in more positive effects with regards to health, particularly childhood obesity levels.

The RA identified for policy ED15 skills and training was to require a financial contribution from developers for training schemes. However, this was dismissed as this would make the cumulative impact of policies unviable, and too onerous for the developer. If this could be a viable requirement in future, it is considered that such a financial contribution would have a positive impact with regards to SA Objective 2.

No RAs have been identified for policies ED3 and ED14.

**Social infrastructure policies S1 and S2**

- 5C2.4.10 Significant positive effects are likely to result from policies S1 (Safeguarding existing community premises) and S2 (New or improved community premises). These policies make provision for community facilities which include D1 and D2 use classes as well as other public service uses such as fire, ambulance, policing, and community safety facilities, all of which are necessary components to a healthy borough. Where new provision is proposed these will be conveniently located and accessible for their intended use, thereby seeking to reduce health inequalities. Ideally, social infrastructure should be located where there is an identified need that helps reduce health inequalities. It is considered this could be more explicitly provided for in the policy in order to better address baseline conditions of community facilities being unevenly spread across the Borough with some neighbourhoods experiencing severe shortages or useable space, while others have are under-used facilities.
- 5C2.4.11 Expansion of St Thomas's Hospital as outlined in Site Allocation 2 should also result in significant positive effects for health in the Borough.

**Recommendation 19:** reference to Policy SI(a) in paragraph 7.14 should read S2(a).

**Recommendation 20:** amend policy S2 to ensure new facilities address identified needs spatially, especially regarding health inequalities.

**Reasonable Alternatives (RA)**

*No RAs have been identified for policies S1 and S2 and there have been no change in strategic approach from the adopted Core Strategy with regards to these policies.*

**Transport and communications policies T1 – T6 and T10**

- 5C2.4.12 It is considered that policies T1, T2 and T3 will likely result in significant positive effects as these policies minimise the need to travel, reduce dependence on the private car and provide attractive and useable environments conducive for safe walking and cycling. These policies should help reduce congestion, air pollution, and encourage more active travel and therefore contribute to improved health (mental and physical) of the Borough. There is strong evidence that reductions in traffic to reduce air pollution are successful in improving health. Policy T2 on walking could be improved by including the word 'safe' to the last sentence of clause (c). Similarly policy T3 could be improved by provision of secure and *covered* cycle parking facilities. The policy provides for showers, changing facilities and lockers. In order to have more people cycling, such facilities need to be commensurate with the size of the development (or expected use). Therefore it is recommended that 'appropriate to the number of cycle parking provided' is included to the last sentence of clause (c). Similarly, second sentence of paragraph 8.11 of the supporting text should include reference to students (in addition to staff and residents cycle parking spaces). The paragraph states that cycle storage requirements are set out in policy Q13 however; this policy has more of a residential focus (see below). It is recognised however that until a critical mass of cyclists is achieved, there will be potential for accidents – behaviour of all road users, especially private and commercial vehicles must improve (HIA on draft London Plan 2009), although it is equally recognised that safety features strongly in the policies.

- 5C2.4.13 Improvements to public transport infrastructure (policy T4) are proposed to address both public transport accessibility and capacity and therefore, if and when delivered,

will result in positive effects in terms of SA Objective 2 by improving access to other services and facilities and employment which will contribute to improved mental, emotional and physical health and wellbeing, as well as reduce poverty. Any improvements or new public transport infrastructure will also need to be designed to be safe, convenient and accessible for use especially by disabled, children and cyclists.

- 5C2.4.14 Policy T5 River transport contains provision for access to the River Thames which can provide a good walking, running and cycling route, as well as mental health benefits associated with access to water and open space. Any new development / addition to the riverside walk should join existing riverside walk to provide a continuous route along the river. The policy states it should be wheelchair accessible. There is uncertainty where this is from. The policy should be clear that riverside walk would need to be wheelchair accessible from the development, as well as existing riverside walk and adjoining street pattern.
- 5C2.4.15 Under policy T6, applications will be supported where they do not have unacceptable transport impacts on the environment or amenity of the area through air quality, noise and disturbance, congestion of road network and other transport modes including public transport, walking and cycling. This seeks to create an environment conducive to improved health. Clause (b) addresses impact on the capacity of the transport system. It is unclear whether all the points listed need to be met. It is recommended that the word 'and' is added to the end of the third bullet point so that developers need contribute to all points listed. It may also be appropriate to add 'for all users' to the end of the second bullet point. This would encapsulate pedestrians, cyclists, visitors, and service and delivery vehicles.
- 5C2.4.16 Health considerations have been included in policy T10 on telecommunications as there will need to be compliance with the International Commission on Non-Ionising Radiation Protection guidelines.

**Recommendation 21:** Policy T2 (c) add the word 'safe' to the last sentence: ...'and provide safe, direct and attractive routes to accommodate these flows'.

**Recommendation 22:** Policy T3 (c), included provision of secure and covered cycle parking facilities; and include the words 'appropriate to the number of cycle parking provided' to the end of the last sentence.

**Recommendation 23:** Paragraph 8.11 - include reference to students with regards to cycle parking spaces.

**Recommendation 24:** That the policy team review policy T5 to ensure that any new development / addition to the riverside walk results in a continuous route along the river (joined with existing riverside walkway). Also the policy should be clear that riverside walk would need to be wheelchair accessible from the development, as well as to the existing riverside walk and adjoining street pattern.

**Recommendation 25:** Clarification that all bullet points of policy T6 clause (b) should be met. Further, it is recommended that 'for all users' is added to the end of the second bullet point.

***Reasonable Alternatives (RA)***

*No RAs have been identified for the Quality of Built Environment policies.*

***Environment and open space policies EN1 – EN4 and EN7***

- 5C2.4.17 Policy EN1 will result in positive effects on SA Objective 2 as it seeks to protect open spaces and require major developments in areas of open space deficiency to provide on-site open space or make financial contribution to enable new open space or improvement to accessibility and quality of existing public open space. Access to green and open spaces is essential for physical and mental health. Improvement of such spaces will also encourage increased use of spaces, making them feel safer and attractive places. Policy EN2 enables access to healthy food through encouraging local food growing and production on vacant or derelict land (temporary use), housing estates and major new residential development where compatible with residential amenity. This may result in some positive effects in terms of SA Objective 2, but the policy only encourages and supports such provision; there is no requirement to provide food growing areas. It is also considered that food growing areas / features or use of innovative spaces can be appropriate in non-residential schemes too, such as some D1 class uses and other social infrastructure. It is recommended that the policy team revisit this policy in light of these comments.
- 5C2.4.18 Overall it is considered that Policy EN3 on low carbon and renewable energy will result in positive health effects as it seeks to ensure carbon emission targets as set out in the London Plan are met, and the mayor's energy hierarchy of be lean, be clean and be green is respected. Be lean measures in particular can be effective at combating fuel poverty as these relate to passive design measures (including orientation and site layout, natural ventilation and lighting, thermal mass and solar shading), active design measures (including high efficacy lighting and efficient mechanical ventilation with heat recovery), as well as how well the building is built (such as U – values and air tightness). It is technically possible to exceed Building Regulation requirements (part L 2012) through demand reduction measures (i.e. be lean) alone.
- 5C2.4.19 It is considered that policy EN3 could provide a stronger emphasis on renewable energy.
- 5C2.4.20 Sustainable design and construction highlights the mental health benefits of providing sustainable housing that at the same time contributes to health, for example, by providing good natural light and ventilation. Policy EN4 requires the highest standards of sustainable design and construction feasible. The intent of this policy should result in positive health benefits from improved building environments (i.e. reduce fuel poverty and illness related to damp conditions, draughts such as respiratory diseases and winter deaths). However, it is considered that the policy could be improved to maximise health benefits in terms of SA Objective 2, but also improve outcomes for SA Objectives 6 (Housing), 7 (Liveability), 8 (Built Environment), 11 (Climate Change), 12 (Water Resources), 13 (Waste) and 14 (Air Quality).
- 5C2.4.21 First, while tools to measure sustainability of dwellings and non-residential buildings have been provided (Code for Sustainable Homes (CSH) and BREEAM respectively), no tool to measure or assess construction of the public realm, highways and other physical infrastructure has been offered. The Civil Engineering Environmental Quality Assessment and Awards Scheme (CEEQUAL) is a tool that aims to improve sustainability in civil engineering and public realm projects. CEEQUAL is used by project teams to assess how well they have dealt with the environmental and many social issues on their projects and provides a mechanism for having those assessments externally and independently verified and recognition gained. To ensure significant positive effects relating to the sustainability of public realm, open space and infrastructure projects; it is recommended that policy EN4 is



amended to include the CEEQUAL assessment and achievement of the 'Excellent' rating. This would help ensure that *all development* (as the policy states) does meet the highest standards of sustainable design and construction possible.

- 5C2.4.22 Second, for clarity it is considered that the second sentence of clause (b) should be amended so that applications for 'all new developments, including refurbishments, conversions and change of use' are accompanied by a CSH or BREEAM pre-assessment.
- 5C2.4.23 Third, it is unclear in clause (b) (i) what the policy position will be for new homes approved after April 2014 but before 2016. The CSH has mandatory credits to achieve particular levels, of which Dwelling Emission Rates (Ene1) is one. To achieve Level 4 a 25% improvement on the 2010 Building Regulations is required. To achieve Level 5, a 100% improvement on the 2010 Building Regulations is required, and Level 6 requires zero net CO2 emissions. This compares with London Plan targets as follows:
- 2010 – 2013: 25% improvement on 2010 Building Regulations
  - 2013 – 2016: 40% improvement on 2010 Building Regulations
  - 2016 – 2031: zero carbon\*

\*The current definition of zero carbon is set to cover only those emissions which are within the scope of the Building Regulations.

Requiring Level 5 in 2015, while ambitious with greater environmental sustainability outcomes; it exceeds London Plan requirements (in terms of reductions in carbon emissions) and may be unfeasible for developers (particularly in the current economic climate, and for smaller developments). However, dwellings will need to be achieving zero carbon from 2016. Therefore, in order to maximise sustainability outcomes for health and other facets of sustainability and assist developers with the step change to zero carbon; it is considered that after April 2014 dwellings should achieve a high CSH Level 4 rating. As a minimum this should be the mid point of Code Level 4, which equates to 76 percentage points.

- 5C2.4.24 It is considered there is a discrepancy in policy EN4 between clause (a) (which seeks the highest standards of sustainable design and construction feasible) and clauses (b) (ii) which states conversions must meet or exceed BREEAM Domestic Refurbishment 'Very Good' unless it is not technically feasible or viable to do so...' and (iii) which states that 'new build non-residential development, major refurbishment of existing non-residential buildings and conversions over 500m2 floorspace should meet or exceed BREEAM 'Very Good'. Achievement of 'Very Good' rating is not best practice and accordingly does not result in 'highest standards' of sustainability. Further, clause (ii) follows with 'unless it is not technically feasible or viable to do so'. It is considered that this 'out clause' would be more justified and appropriate if the required standard was achievement of 'Excellent' rating. Moreover BREEAM Domestic Refurbishment is a recent addition to the BREEAM tools and has been prepared and tested specifically for residential refurbishment projects. Of the twelve pilot projects, ten achieved a rating of 'Excellent' or higher. The remaining two achieved 'very good'. Given it is a new assessment tool and technologies for refurbishment projects may still be developing and associated costs may still be high, and taking into account the current economic climate; achievement of BREEAM Very Good as a minimum may be acceptable to begin with. However, as use of BREEAM Domestic Refurbishment becomes more commonplace incremental change for higher standards would be appropriate. Achievements of only 'Very Good' for domestic refurbishment projects for later stages of the plan period (to 2030) would not be in the interests of sustainable development or the 'highest standards of sustainable design and construction'.

Accordingly clause (b)(ii) should be amended to be similar in format as clause (b)(i), for example by requiring BREEAM Excellent by 2016.

- 5C2.4.25 Clause (b)(ii) refers to improvements to overall energy and water efficiency of the existing building where achievement of BREEAM Domestic Refurbishment Very Good is not technically feasible or viable. The level or kind of improvement expected is not clear. It is considered that more detail is required on this; the use of targets may be appropriate. While it is important that policies are achievable and delivered; it is considered policies need also be ambitious.
- 5C2.4.26 Clause (b)(iii) should be split so that different standards apply to new build non-residential developments and refurbishment and conversion of existing non residential buildings. The BREEAM new build tool has been used in practice for many years and is not a new tool for developers. However, the BREEAM tool for refurbishments and conversions of non-residential buildings has not yet been developed to date and therefore this should be recognised in the policy. Accordingly, it is considered reasonable for new build non-residential development to achieve BREEAM Excellent and refurbishment and conversion of non-residential development achieve BREEAM Very Good. Consistent with the recommendation above for clause (b)(ii); incremental change for higher standards will be appropriate during the plan period.
- 5C2.4.27 Policy EN4 also makes provision for living walls and roofs. This will contribute to health benefits by insulating buildings during winters and keeping buildings cool during hotter temperatures, and bringing nature closer to people. They also provide a number of other environmental benefits such as biodiversity, climate change adaptation and air quality. Paragraph 9.24 of supporting text states that ‘the Council expects living roofs and walls to be included in all new developments where feasible and supports the retrofitting of existing buildings wherever possible’. However, it is considered that policy EN4 (c) is not very robust, in particular with use of the words ‘should’ and ‘where feasible and appropriate to the character and context of the development’. The supporting text does not provide guidance on what this latter part means, nor does it provide examples (conservation areas or heritage – although it noted that it relates to the development, and not the surrounding area). It is recommended that this is clarified by the policy team.
- 5C2.4.28 Policies EN5 Flood Risk and EN7 waste management should result in positive effects on SA Objective 2. Evidence suggests adults who experience flooding in their homes are at risk of psychological distress. Measures to mitigate flood risk are part of building community resilience. Policy EN5 seeks to mitigate effects of flooding.

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing. It is considered this would be a lost opportunity with regards to SA Objective 2. The RA identified for policy EN3 is to provide Lambeth specific targets. However this was dismissed as there is no evidence base to support local targets. The RA for policy EN7 waste management is to allocate sites for waste management rather than indicate broad locations (as proposed). It is considered that the alternative risks blighting an area (which may in fact never be used by a waste operator) and this could have adverse impacts on local communities if pride of place and amenities are eroded. No RAs have been identified for policies EN1 and EN4.*

**Recommendation 26:** The policy team review policy EN2 to more robustly provide for community gardens / food growing areas in major residential developments (for example through use of the word 'should' rather than 'encourage'); and allow provision of food growing areas in non-residential developments where appropriate.

**Recommendation 27:** Review policy EN3 to provide stronger emphasis on provision of renewable energy in developments.

**Recommendation 28:** Amend policy EN4 to include provision of CEEQUAL 'excellent' rating for infrastructure, public realm and open spaces.

**Recommendation 29:** Amend the second sentence of policy EN4 clause (b) so that applications for 'all new developments, including refurbishments, conversions and change of use' are accompanied by CSH or BREEAM pre-assessment.

**Recommendation 30:** Policy EN4 - that after April 2014 dwellings should achieve a high CSH Level 4 rating which should be defined as a minimum as the mid point between levels 4 and 5 (i.e. 76 percentage points).

**Recommendation 31:** Policy EN4 clause (b)(ii) should be amended to incorporate incremental change for higher standards, for example by requiring BREEAM Excellent by 2016.

**Recommendation 32:** Policy EN4 clause (b)(ii) include target for energy and water efficiency improvements expected.

**Recommendation 33:** Policy EN4 clause (b)(iii) should be split so that different standards apply to new build non-residential developments ('Excellent' rating) and refurbishment and conversion of existing non residential buildings ('Very Good' rating to start with incremental change to higher standards for later stages on the plan period).

**Recommendation 34:** Policy EN4 that the policy team carefully consider policy implications of use of words 'must' and 'should'.

**Recommendation 35:** Review EN4(c) in light of supporting text paragraph 9.24. Either remove the words 'and appropriate to the character and context of the development' from the policy, or include guidance on what this means and when this might apply in the supporting text.

***Quality and Built Environment policies Q1, Q2, Q10, Q11, Q14, Q15, Q25, Q26***

5C2.4.29 Overall it is considered that the design policies will result in positive effects on the health of the Borough, particularly as these seek to protect amenity, including privacy, daylight and sunlight, mitigating noise, disturbance and other adverse effects that can impact on mental, emotional and physical health and wellbeing. However, there is some uncertainty in Policy Q2 Amenity. It is uncertain if clauses (ii) and (iii) apply to existing neighbours (adjacent properties) or just the new development itself. The supporting text does not provide clear guidance on this. Privacy and outlook of

adjacent (rather than just adjoining) properties are important elements of amenity, in particular where tall buildings are proposed. Accordingly, it is recommended that clause (ii) is amended to address this, for example: 'an acceptable standard of privacy results...' or 'acceptable standards of privacy are provided...'. Similarly clause (iii) may benefit from a similar amendment: 'an adequate outlook results...' or alternatively 'adequate outlooks are provided...'. Clause (iv) suggests a development on a site need only consider daylight and sunlight on 'existing and adjoining property' which would imply that this wouldn't apply to vacant sites. In other words, the value of including the word 'existing' is unclear. Finally, it is recommended that clause (vi) is amended to read: '...does not cause unacceptable noise or disturbance through its operation.'

- 5C2.4.30 In line with Recommendation 24 above on policy T5 to ensure a continuous riverside walkway, it is further recommended that clause (iii) of policy Q25 River Thames is also amended to include the word 'continuous'.
- 5C2.4.31 The draft Local Plan policies do not appear to favour dual aspect units or a presumption against north facing units although this design consideration is included in some site allocations. While it is noted this is mentioned in the Housing Development and House Conversions SPD and London Housing Design Guide; it is recommended this is reviewed by the policy team for inclusion in Local Plan. (Lifetime Homes standards are mentioned in these documents yet still provided for in the Local Plan.)
- 5C2.4.32 Policy Q13 on refuse and recycling storage may benefit from referencing 'public health' although this is encapsulated in clause vi (be secure and safe). It is recommended clause (a) is amended as follows: 'In order to protect visual and residential amenity and public health the council will expect all refuse and recycling storage to:...'

**Recommendation 36:** That Policy Q2, clauses (ii) and (iii) protect both amenity of the development proposed and that of existing adjacent properties. Specifically clause (ii) should be amended to 'an acceptable standard of privacy results...' or alternatively, 'acceptable standards of privacy are provided...' and clause (iii) should be amended to 'an adequate outlook results...' or alternatively 'adequate outlooks are provided...'

**Recommendation 37:** Review the purpose and intent of the word 'existing' in clause (iv) of Policy Q2. It should be clear that the clause applies to vacant adjoining properties also.

**Recommendation 38:** Clause (vi) policy Q2 is amended to read: '...does not cause unacceptable noise or disturbance through its operation.'

**Recommendation 39:** Policy Q25 clause (iii) is amended as follows: maintain and create publicly accessible spaces and routes along the river that provide for a continuous riverside walkway.

**Recommendation 175:** Second sentence of clause (a) Policy Q13 is amended as follows: In order to protect visual and residential amenity and public health the council will expect all refuse and recycling storage to:...'

***Places and Neighbourhoods Policies PN1 – PN10***

5C2.4.32 In combination with other Local Plan policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN10) should result in positive effects in relation to SA Objective 2. In particular policy PN 1 on Waterloo will result in significant positive effects with the creation of a new primary care centre in the wider Waterloo area, as well as support for development strategies associated with St Thomas's Hospital and Kings College. Given the level of development proposed for Vauxhall, it is considered that policy PN2 for Vauxhall would benefit by making specific provision for healthcare in this area. It is noted that community uses are provided for but a more specific mention of healthcare facilities might be more appropriate. Recommendations 12 to 14 identified in analysis of SA Objective 1 are further endorsed with reference to SA Objective 2. In light of policy ED9, the new primary school (proposed as part of the Clapham Park housing estate regeneration project) should not be located within 400m of the Clapham town centre boundary. It is unclear what is meant by 'supporting enhancements to the public realm of the town centre to improve vehicle movements (Policy PN5(b))'. There is strong evidence that suggests interventions to change traffic conditions (such as cutting speed limits) reduce road accidents, and that reductions in traffic to reduce air pollution are successful in improving health. The supporting text should reflect this. Reducing dominance of traffic (as the supporting text refers) could be interpreted (together with the current wording of policy PN5(b)) to mean reducing the number of parked vehicles. Policies PN1, PN2, PN3, PN4 and PN8 promote mixed use developments and tall buildings. High rise residential tower blocks do not necessarily create neighbourliness and are not good for all residents. Literature suggests high rises are less satisfactory than other housing, in particular for children, as social relations are more impersonal, increased fear of crime and may contribute to suicides. High rise housing is more satisfactory for residents when they are more expensive and people have chosen to live there. Concentrations of high rise office accommodation in mixed use residential schemes has the potential to leave space empty for parts of the week which may isolate residents from local services and amenities as well as social interaction. An appropriate balance between uses will need to be achieved to avoid adverse impacts on health and wellbeing. It is recommended that the Local Plan contain policy requiring a Health Impact Assessment for all major developments in the Borough.

**Recommendation 40:** Policy PN2 for Vauxhall may benefit from making specific provision for healthcare in this area (in addition to Annex 2).

**Recommendation 41:** Policy PN5 – review supporting text to provide explicit meaning for clause (b) particularly with reference to 'improve vehicle movements'.

**Recommendation 176:** That the Local Plan contain policy that requires a Health Impact Assessment of all major developments in the Borough.

## 5C2.5 Assessment of Sites

### Likely significant effects of implementing Site Allocations, taking into account mitigation

All sites in Table 14 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 2.

**Table 13: Significance criteria for SA Objective 2: Health**

Positive	Negative
<ul style="list-style-type: none"> <li>• Positive contribution to key determinants of health like decent housing, jobs, good air quality, reduced crime.</li> <li>• Site specific allocations: no identified air quality or noise issues.</li> <li>• Promotes good access to health services.</li> <li>• Site specific housing allocations: located within 30 minutes travelling time of GP surgeries and hospitals.</li> <li>• Tackles poverty and social exclusion.</li> <li>• Promotes active travel (walking and cycling) and healthy lifestyles.</li> </ul>	<ul style="list-style-type: none"> <li>• Negative contribution to key determinants of health like decent housing, jobs, good air quality, reduced crime.</li> <li>• Site specific allocations: identified air quality or noise issues.</li> <li>• Worsens access to health services.</li> <li>• Site specific housing allocations: located more than 30 minutes travelling time of GP surgeries and hospitals.</li> <li>• Worsens poverty and social exclusion.</li> <li>• Promotes unsustainable travel patterns (like private car use) and dispersed uses.</li> <li>• May worsen road safety.</li> </ul>

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**TABLE 14: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 2: HEALTH**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- Preferred use for the site is health use for expansion of St Thomas's Hospital to provide clinical and ancillary hospital uses, and replacement of affordable housing</li> <li>- Public transport accessibility is exceptional and the site contributes positively to active travel and healthy lifestyles</li> </ul>	<ul style="list-style-type: none"> <li>- the site abuts railway tracks so there may be some noise effects</li> </ul>	<ul style="list-style-type: none"> <li>- redesign of the site should take into account the railway tracks and the use of the site and associated needs</li> </ul>
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	<ul style="list-style-type: none"> <li>- relatively good levels of public transport accessibility</li> <li>- preferred use is for education use which will reduce need to travel for nearby parents and students</li> <li>- tackles social exclusion (allowing children to attend a school in their local area)</li> </ul>	<ul style="list-style-type: none"> <li>- As the front part of the site is a former petrol station there may be contaminated soils and/or materials on the site</li> <li>- site is within 400m of Brixton Town Centre boundary (policy ED9 would not apply as currently worded)</li> </ul>	<ul style="list-style-type: none"> <li>- Appropriate measures to avoid any adverse health effects associated with former use of the site as a petrol station.</li> </ul>
3	Vale Street Depot, Vale Street SE27	<ul style="list-style-type: none"> <li>- preferred use of site is education or housing with retention of the reuse and recycling centre</li> <li>- tackles social exclusion (allowing children to attend a school in their local area)</li> <li>- policy seeks to protect amenity of neighbouring residents</li> </ul>	<ul style="list-style-type: none"> <li>- public transport accessibility is very poor and may result in increased vehicle journeys by parents dropping kids off and/or picking them up from school</li> <li>- potential safety issues for children with dual use of site as education and reuse /recycling centre which may result in high traffic movements to and from the site during all hours of the day.</li> </ul>	<ul style="list-style-type: none"> <li>- Early integrated design is recommended for the two different uses to avoid safety issues of the two different land uses on the one site.</li> <li>- Compliance with other relevant Local Plan policies (e.g. travel plans)</li> </ul>
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- preferred use is positive contribution to key determinants of health as includes residential, and employment (office) promotes active travel</li> <li>- no identified air quality or noise issues</li> <li>- provision of a new city square</li> <li>- located within 30 minutes travelling time of a hospital</li> <li>- public transport accessibility level is exceptional</li> </ul>		
5	Shell Centre, 2-8 York Road SE1	<ul style="list-style-type: none"> <li>- preferred use is positive contribution to key determinants of health as includes affordable housing, sport and leisure, community facilities</li> </ul>		

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		<ul style="list-style-type: none"> <li>and employment (office)</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> <li>- no identified air quality or noise issues</li> </ul>		
6	Waterloo Station, Waterloo Road SE1	<ul style="list-style-type: none"> <li>- preferred use is positive contribution to key determinants of health as includes public transport improvements and employment</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> <li>- no identified air quality or noise issues</li> <li>- promotes active travel</li> </ul>		
7	Cornwall Road Bus Garage, Cornwall Road SE1	<ul style="list-style-type: none"> <li>- preferred use is positive contribution to key determinants of health as includes residential and commercial (employment)</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> </ul>	<ul style="list-style-type: none"> <li>- noise and disturbance issues may arise if the replacement bus garage is provided on-site along with residential and commercial activities</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other Local Plan policies (in particular those addressing amenity)</li> </ul>
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	<ul style="list-style-type: none"> <li>- preferred use is positive contribution to key determinants of health as includes residential and commercial (employment)</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> <li>- policy seeks to make sure that both existing and new residential amenity is protected and new dwellings are located away from the viaduct</li> </ul>	<ul style="list-style-type: none"> <li>- noise and disturbance issues may arise with the retention of an operational fire station along with residential and commercial activities which can lead to adverse mental health and wellbeing</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other Local Plan policies (in particular those addressing amenity)</li> </ul>
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	<ul style="list-style-type: none"> <li>- preferred use is positive contribution to key determinants of health as includes residential and employment, with potential for new primary school</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> <li>- site allocation design principles protect the amenity of existing residential development and ensures amenity of new residential development is protected from the noise, pollution and vibration from the railway viaduct</li> <li>- promoted active travel and healthy lifestyles</li> <li>- tackles social exclusion (particularly if the primary school is delivered as it will enable children of Vauxhall area to attend a local school)</li> </ul>	<ul style="list-style-type: none"> <li>- identified noise issues</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other Local Plan policies (in particular those addressing amenity)</li> </ul>
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the	<ul style="list-style-type: none"> <li>-preferred use is positive contribution to key determinants of health as includes residential, community uses and employment</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> </ul>		<ul style="list-style-type: none"> <li>- Compliance with other Local Plan policies (in particular those addressing amenity)</li> </ul>



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	railway viaduct to the east SW8	<ul style="list-style-type: none"> <li>- site allocation design principles protect the amenity of new residential development from the noise, pollution and vibration of the railway viaduct</li> <li>- promoted active travel and healthy lifestyles</li> </ul>		
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	<ul style="list-style-type: none"> <li>-preferred use is positive contribution to key determinants of health as includes town centre led development and residential, and employment</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> <li>- promoted active travel and healthy lifestyles</li> </ul>	<ul style="list-style-type: none"> <li>- possible noise and pollution impacts on residential amenity in particular due to busy traffic junction</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other Local Plan policies (in particular those addressing amenity)</li> </ul>
12	Somerleyton Road SW9	<ul style="list-style-type: none"> <li>-preferred use is positive contribution to key determinants of health as includes residential, employment, community facilities, social enterprise and open space</li> <li>- tackles poverty and social exclusion</li> <li>- site allocation design principles protect amenity of existing residential developments and ensures any new dwellings are dual aspect</li> </ul>		
13	Popes Road SW9	<ul style="list-style-type: none"> <li>-preferred use is positive contribution to key determinants of health as includes residential, employment, community facilities, leisure and cycle parking</li> <li>- tackles poverty and social exclusion</li> <li>- located within 30 minutes travelling time of a hospital</li> <li>- promoted active travel and healthy lifestyles</li> </ul>	<ul style="list-style-type: none"> <li>- preferred use of site is to include a car park</li> <li>- associated air quality issues</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other relevant Local Plan policies</li> </ul>
14	Brixton Central (between the viaducts) SW9	<ul style="list-style-type: none"> <li>- provision of market, food and drink, community, leisure and recreation, retail uses for social inclusion and health benefits</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> <li>- promotes sustainable travel</li> </ul>	<ul style="list-style-type: none"> <li>- food and drink may not necessarily be healthy</li> </ul>	
15	SW2 Enterprise Centre	<ul style="list-style-type: none"> <li>-preferred use is positive contribution to key determinants of health as includes residential, employment, community facilities and civic uses</li> <li>- public transport accessibility level is exceptional</li> <li>- located within 30 minutes travelling time of a hospital</li> </ul>		
16	260 – 367 Norwood Road SE27	<ul style="list-style-type: none"> <li>-preferred use is positive contribution to key determinants of health as includes residential, access to food (supermarket) community facilities, and some employment and new public square</li> <li>- public transport accessibility is very good</li> <li>- tackles poverty and social exclusion</li> <li>- promotes sustainable transport</li> </ul>		

**5C2.6 Summary of Local Plan policies and site allocations**

5C2.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives and, it is likely that the Local Plan will have a positive effect on the existing baseline and in improving conditions and services that engender good health and reduce health inequalities.

**Table 15: Summary assessment of effects of draft Local Plan on health objective**

Assessment of effects of draft Local Plan on SA objective 2	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health	+/?	++	<p>Health is influenced by a wide range of factors, many of which are beyond the remit of a Local Plan. However, to the extent that local planning policy can play a part, it is considered that overall the proposed Local Plan will have significant positive effects on the health objective and existing baseline conditions, in particular addressing homelessness, overcrowding, mixed housing sizes, affordability and accessibility. It is considered that the Local Plan policies (provided SA recommendations are incorporated) will make a significant contribution to, and appropriately address, the sustainability issues pertinent to Health and Well Being (and Equalities and Accessibility) for the Borough outlined in Table 3.</p> <p>Generally, it is considered that the site allocations are well located to result in significant positive effects on health and wellbeing. Most allocations include public realm improvements which should help promote physical activity in areas. Issues affecting residential amenity have been identified arising from multifunctional use of sites (for example fire station, bus station) or proximity to railway viaduct. However, appropriate design and construction will mitigate such adverse effects on amenity. The sites proposed for new schools may increase vehicles journeys associated with school drop-off and pick up, although the school travel plan will address this.</p>	Improvements in terms of providing additional housing, attracting and supporting employment and business investment, enabling local provision of health services, access to open space and enabling open space in areas of current open space deficiency, and public transport are only likely to be seen in the medium term. To reflect in actual health and inequality statistics will likely be a long term measure.	Permanent

**5C2.7 Recommendations for monitoring likely significant effects**

5C2.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Number of planning permissions granted or completed for community, religious, leisure or health facilities in the borough
- Life expectancy
- Deaths from heart disease less than 75 years
- Amount of 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.

### 5C3.0 ACCESS AND SERVICES

5C3.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

- Objective 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.

5C3.0.2 To achieve this objective, plan policies should provide access for all regardless of age, gender, disability, race or faith to services jobs, leisure and amenities near to home and reducing the need to travel.

#### 5C3.1 Relevant policy objectives

##### National Level

5C3.1.1 Accessibility is incorporated into a number of policies of the *National Plan Policy Framework 2012*. For example paragraph 38 states the large scale residential development should promote a mix of uses in order to undertake day-to-day activities including work on site. Key facilities such as primary schools and local shops should be located within walking distance of most properties where practical. Paragraph 35 makes reference to considering the needs of people with disabilities by all modes of transport.

##### Regional Level

5C3.1.2 A key theme of the *London Plan 2011* is that London and its infrastructure should be accessible and inclusive to all. A number of policies address accessibility. For example, policy 3.16 of the *London Plan (2011)* on social infrastructure states that facilities (such as education, health, leisure, community and places of worship) should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.

##### Local Level

5C3.1.3 The *Lambeth Local Implementation Plan 2011* includes a range of measures to improve accessibility, for example improving the walking and public realm environment for people with disabilities by introducing adequate dropped kerbs and tactile paving across the borough; removing redundant street furniture and obstructive bollards and rationalising the amount of street furniture across the borough; and re-lay crossovers and uneven paving.

#### 5C3.2 Baseline conditions and existing issues

5C3.2.1 Similar to other inner London boroughs, Lambeth has a young age profile consisting of many working age people, rather than large numbers of children and teenagers (0-19 year olds represent 20.8% of the population and 53.6% of residents are aged 20-44 years). Lambeth is in the top five districts in the country for people in this age group (Census 2011). This large working age group is likely because Lambeth is a destination for many young working age migrants. Lambeth's older population (aged 60+) is projected to grow by 46% in the next 20 years (2011-31), compared to a 17% growth across the whole population (State of Borough 2011).

5C3.2.2 The number of those aged over 85 is expected to increase which will significantly increase age-related long term conditions and demand for care services. This

includes some people with enduring mental health needs who will become part of the ageing population, with particular housing needs (APH 07/08) (LIP 2011).

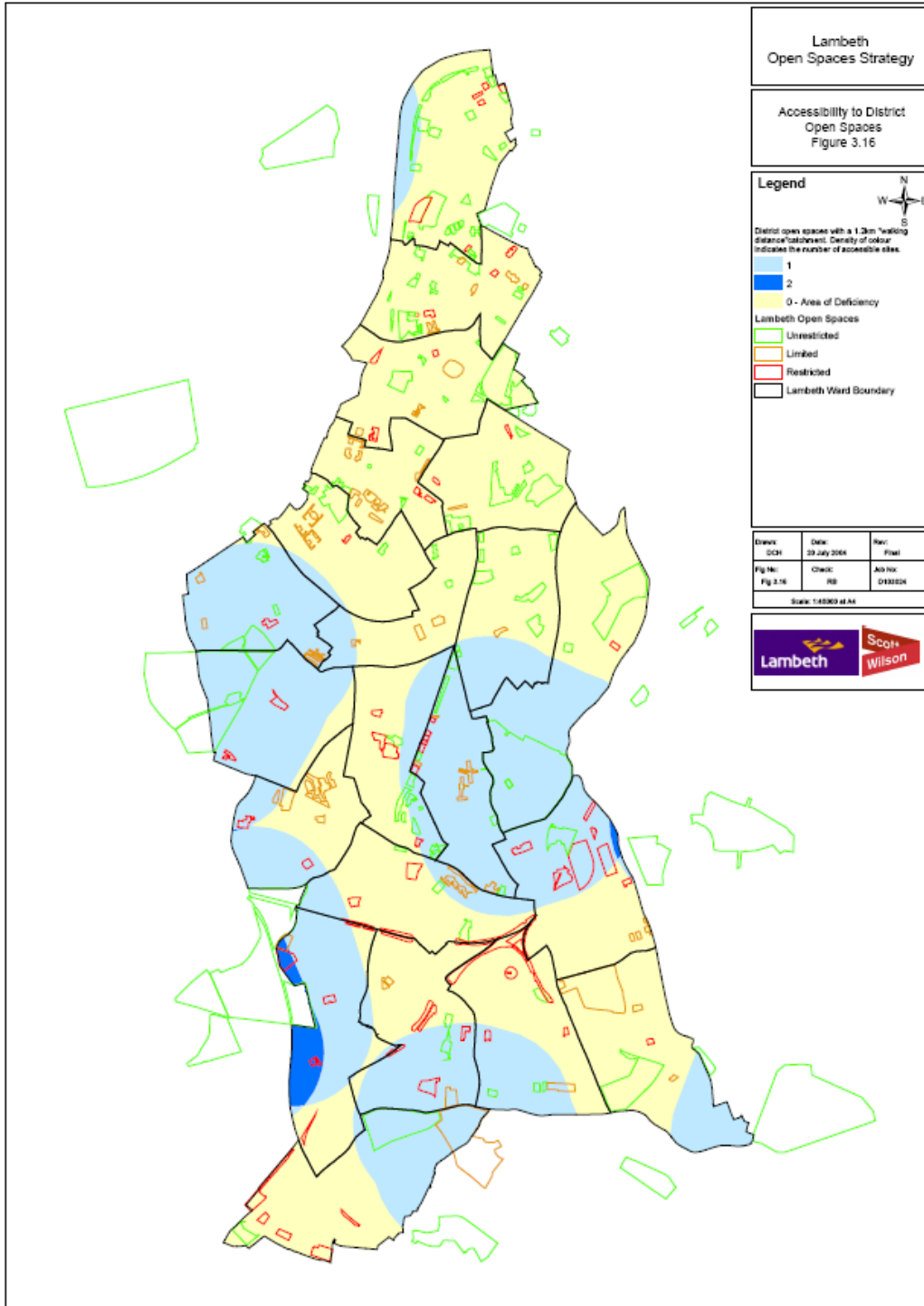
- 5C3.2.3 Table 16 below provides predicted numbers of disabled people in 2011 according to the Department of Health *PANSI* projections (State of the Borough 2011).

**Table 16: Disabilities in Lambeth**

Description of disability	Lambeth no.	Lambeth %	London %
<b>Physical Disabilities (18-64 year olds)</b>			
Moderate physical disability	13,391	6.4	7.0
Serious physical disability	3,423	1.6	1.9
Serious visual impairment	137	0.1	1.9
Moderate or severe hearing impairment	5,082	2.4	3.0
Profound hearing impairment or deaf	38	0.0	0.0
Males with a physical disability and permanently unable to work	3,983	3.8	2.1
Females with a physical disability and permanently unable to work	2,577	2.4	1.4
<b>Mental Disabilities (18-64 year olds)</b>			
Common mental disorder	33,446	15.9	16.1
Antisocial personality disorder	761	0.4	0.4
Psychotic disorder	821	0.4	0.4

- 5C3.2.4 Section 4 and Table 3 of the Report provides detail on public transport accessibility in the Borough.
- 5C3.2.5 Under the Department for Transport 'Access for All' programme, lifts have been installed at Herne Hill, Streatham Common and Streatham Hill Railway stations. Lifts are also proposed at Vauxhall and Waterloo stations. Lift installation at Vauxhall station is due for completion in 2014. Lift installation at Waterloo station is unlikely during the LTP timeframe due to funding constraints.
- 5C3.2.6 The Lambeth resident's survey (2011) for disabled residents and those with long term illness found that similar to older people; there is a longer term trend of disabled residents being less likely to use all cultural services<sup>1</sup>. Further research was undertaken to explore the reasons underlying this (which included not feeling welcome and comfortable in leisure centres, poor access and lack of awareness about available discounts).
- 5C3.2.7 There are 1.54 hectares of unrestricted open space in Lambeth per 1,000 population, although access is unevenly spread and particularly limited in the north of the borough. Lambeth contains two Areas of Deficiency for Access to Nature for London (AODs) covering approximately 40% of the borough (see Figure 2). 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).
- 5C3.2.8 Open space provision for residents in the Borough includes 228 open spaces within Lambeth above 0.2ha in size and 15 further sites in adjacent Boroughs, accessible to the population of Lambeth (Open Space Strategy 2004).

<sup>1</sup> Disabled residents are less likely to use leisure and sports facilities (20% vs 27%) and parks and open spaces (39% vs 55%). They are more likely to be concerned about not enough being done for older people (24% vs 11%), and less likely to be concerned about pollution of the environment (7% vs 10%) and public transport (3% vs 6%).



**Figure 2: Areas of deficiency for access to nature**

5C3.2.9 Lambeth currently offers a good range of play facilities but improvement to quality is required in some cases. A recent audit also highlighted geographical disparity in access to play across the borough, with a particular lack of facilities in the south of the Borough, in West Norwood and Streatham (Infrastructure Programmes 2010). As population increases, access to quality play provision will become an increasing priority across the Borough as a whole.

- 5C3.2.10 There is already a wide range of community facilities across Lambeth including parks, open spaces, play areas, allotments, Customer Centres, community centres, day care centres, nurseries, Children's Centres, youth centre, local schools with extended opening hours, faith buildings, libraries, leisure centres, pubs, cafes and local shops. However, coverage is currently unevenly spread across the Borough, with some neighbourhoods experiencing severe shortages of usable space, while others apparently have too many under-used facilities.
- 5C3.2.11 The number of school places in the Borough is currently insufficient to meet future demand, both at secondary and primary level. The Council has had to add additional temporary classrooms each year, which is an unsustainable position. More land and funding are required to build additional schools to meet projected future demand over the next ten years.

### **5C3.3 Likely evolution without the Plan**

- 5C3.3.1 In the absence of the new Local Plan, reliance would be had on National and London Plan policies. However, there would be a high risk that local context would be lost and the focus on specific areas requiring improved accessibility (for example, improved transport accessibility east to west of the Borough, and school places) may diminish.

### **5C3.4 Assessment of Policies**

#### **Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation**

- 5C3.4.1 The main policies relevant to achievement of the SA Objective are:

D1 – Delivery and monitoring	T1 – Sustainable travel
D2 – Presumption in favour of sustainable development	T2 – Walking
D3 – Infrastructure	T3 – Cycling
D4 – Planning obligations	T4 – Public transport infrastructure
H3 – Safeguarding existing housing	T5 – River transport
H2 – Delivering affordable housing	T6 – Assessing impacts of development on transport capacity
H5 – Housing standards	T7 – Parking
H6 – House conversions	T9 – Mini-cabs, taxis and private hire vehicles
H7 – Student housing	EN1 – Open Space
H8 – Housing to meet specific community needs	EN2 – Local food growing and production
H9 – Hostels and houses in multiple occupation	Q1 – Access for disabled people
H10 – Gypsy and Traveller needs	Q7 – Urban design / public realm
ED6 – Town centres	Q17 – Shop fronts and signage
ED8 – Night-time economy and food and drink uses	Q25 – River Thames
ED11 – Loss of retail uses (A class) outside town centres	PN1 – Waterloo
ED13 – Hotels and other visitor accommodation	PN2 – Vauxhall
SI1 – Safeguarding existing community facilities	PN3 – Brixton
SI2 – New or improved community facilities	PN4 – Streatham
SI3 – Schools	PN5 – Clapham
	PN6 – Stockwell
	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 – Herne Hill
	PN10 – Loughborough Junction

***Delivery and monitoring policies D1 – D4***

5C3.4.2 Policies D1- D4 will contribute towards the attainment of SA Objective 3 through working with a range of partners, delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including promotion and maintenance of mixed, balanced and diverse communities, ensuring maximum accessibility for disabled people and child friendly environments. The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth that result in inclusivity of the Borough. Section 106 funding will provide or fund local improvements to infrastructure, including access to facilities.

***Housing policies H2, H3 and H5 – H10***

5C3.4.3 It is considered that the housing policies will result in positive effects on SA Objective 3. Policy H2 seeks to provide affordable housing and policy H3 seeks to safeguard existing housing (including affordable), both of which will provide increased accessibility to housing. Policy H5 will result in significant positive effects as it makes provision for 'Lifetime Homes' and wheelchair accessible units which will allow older people to remain in their homes as their mobility and health changes. Recommendation 16 identified in SA Objective 2 of amending clause (a)(ii) to ensure *at least* ten percent of units as wheelchair accessible is further endorsed with respect to SA Objective 3. It is noted that policy ED13 for visitor accommodation requires 'at least 10 percent of new provision to be wheelchair accessible' (consistent with London Plan policy). Policy H5 also makes good provision for outdoor amenity space in residential developments and children's play space. It is unclear whether the 30m<sup>2</sup> of external amenity space for new houses should be private or not. Additionally, recommendation 17 made in SA Objective 2 is further endorsed against SA Objective 3.

5C3.4.4 Policy H7 is on student housing and clause (a) (v) states: 'is located in an area with good public transport access, and access to local shops, workplaces, services and community facilities'. It is unclear how 'good public transport access' will be defined. Similarly, 'access to local shops...' by comparison may suggest that the access need not be 'good'. It is recommended that clause (v) is amended as follows:

(v) 'Is located in an area with good public transport access (*PTAL of 4 or more*), and easy access to local shops, workplaces, services and community facilities'.

Alternatively, good public transport access could be defined in the supporting text as PTAL of 4 or more (as it somewhat is in supporting text of policy ED13).

5C3.4.5 It is considered that policy H8 will result in significant positive effects for SA Objective 3. It aims to provide suitably designed and located housing options for vulnerable groups, and contribute to creating mixed, balanced and inclusive communities. Similarly, policy H9 seeks to be fully inclusive by providing for new hostels and houses in multiple occupations.

5C3.4.6 In order to achieve housing targets and maintain housing for all needs in the Borough, it is recommended that clause (b) (ii) of Policy H8 and clause (b) (iii) of Policy H9 are amended to include '...on site or elsewhere *in the Borough*.'

5C3.4.7 Policy H10 provides for gypsy and traveller needs. While this policy aims to result in positive effects for this group; any new site identified would need to be situated 'within a reasonable distance of local shops, services and community facilities...'. It is unclear how a 'reasonable distance' would be defined, and the supporting text does not provide further guidance on this. Accordingly it is recommended that the

supporting text makes provision of this.

**Recommendation 43:** Policy H5 – clarify whether the 30m<sup>2</sup> of external amenity space for new houses should be private or not.

**Recommendation 44:** Amend Policy H7 (a) (v) as follows ‘Is located in an area with good public transport access (*PTAL of 4 or more*), and easy access to local shops, workplaces, services and community facilities’.

**Recommendation 45:** Amend policies H8 (b) (ii) and H9 (b) (iii) so that existing accommodation is re-provided...’on site or elsewhere within the Borough’.

**Recommendation 46:** Policy H10 supporting text – provide guidance on how ‘reasonable distance’ would be defined.

**Reasonable Alternatives (RAs):**

*The RAs identified for policy H2 Affordable Housing include always requiring affordable housing on site even if this means accepting a lower proportion (based on feasibility); always allowing affordable housing offsite; clearly defined criteria as to when off site would be allowed (proposed approach); and/or payment in lieu in exceptional circumstances to feed into existing stock of affordable housing (proposed approach). There were also alternatives considered relating to the percentage of affordable housing required (i.e. a lower threshold); varying the threshold across the Borough and not requiring affordable housing provision or payment on sites providing less than 10 units. In terms of SA Objective 3 it is considered that varying the percentage threshold for different parts of the Borough or the other alternative of always allowing affordable housing offsite may not result in best effect for an environment that is fully inclusive. In addition the Viability Assessment does not support this approach. It is considered that always requiring affordable housing onsite (even if this reduced the amount) limits flexibility of the policy and therefore could limit accessibility to affordable housing. Requiring a lower percentage threshold (for example 30% rather than the proposed 50%) effectively reduces the target for developers and will result in less affordable housing being delivered in the Borough.*

*The RAs identified for policy H3 Safeguarding existing housing is to not allow exceptional loss of residential units for nursery or childcare use. Provision of local nursery or childcare can provide more accessibility to parents of these key services and facilities, particularly in helping parents with their work/life balance. It is therefore considered that the alternative of not allowing in exceptional circumstances the loss of residential housing for childcare would likely result in some adverse impacts for local communities with regards to SA Objective 3.*

*The RAs identified for policy H5 are to produce Lambeth housing standards, adopt London Plan housing standards or use a combination of both (i.e. London Plan for internal standards and Lambeth standards for external standards (as proposed). London Plan housing standards for external open space is lower than the proposed Lambeth standards. With regards to SA Objective 3, it is considered that the higher standards of open space / communal gardens included in the Lambeth standards offer increased likelihood of accessibility to open space and children’s play areas.*

*The RAs for policy H7 student housing include capping student housing levels when certain levels are met in certain areas; and setting a cap on student housing in Lambeth as a whole. Depending on the level of the cap; it is considered that these alternatives may not be conducive to creating an environment that is fully inclusive with respect to students.*

*The RA identified for policies H8 (housing to meet specific community needs) and H9 (hostels and houses in multiple occupation) include not resisting the loss of these housing types. In terms of SA Objective 3, this alternative would result in significant adverse impacts on accessibility and inclusiveness for all people, particularly the elderly and disabled in the Borough, particularly exacerbating health inequality issues and limiting housing options.*

*There are no identified RAs for policies H6 and H10.*



**Economic Development policies ED6, ED8, ED11, ED13**

5C3.4.8 Policy ED6 supports vitality and viability of Lambeth town centres including safeguarding local shops and other local services to meet community need within neighbourhoods. Food and drink uses (policy ED8) accommodating pavements will need to consider accessibility by arranging such use so as not to be a hazard to disabled and older people and families with small children. Policy ED11 seeks to maintain access to retail premises by supporting change of use from A class use if there is a centre within reasonable walking distance (defined as around 400 metres). Policy ED13 on visitor accommodation is commended, particularly clause (b) on accessibility and inclusion; however use of the word 'should' is noted compared to clause (a) which uses the word 'must'.

**Reasonable Alternatives (RAs)**

*The RA for policy ED6 Town Centres is to not require reprovision on affordable terms for independent shop premises as part of major redevelopments. It is considered that this alternative would likely result in adverse impacts on SA Objective 3 in terms of creating an environment whereby all services and facilities (including small independent shops and services) are accessible to all members of the community. Town centres usually have good transport links and it is therefore preferable that small independent shops fulfilling local needs are provided in such centres.*

*The RA identified for policy ED8 – Night time economy and food and drink uses would be to apply clause (c) to any major or district centre rather than just Waterloo and Vauxhall Opportunity Areas. This would mean there would be less control on the number of food and drink uses in major and district centres in the Borough. In terms of SA Objective 3, this may limit the range of services available in the town centres. A further RA identified is to allow different percentage thresholds in different parts of the Borough. However this was dismissed as being too difficult/complex and had no supporting evidence base. Another alternative is to allow a higher percentage of food and drink uses on ground floor units in primary shopping areas (i.e. increased from 25% frontages). In terms of SA Objective 3, it is considered that the proposed policy approach is likely to result in more positive effects for the borough overall than the alternative approaches.*

**Social Infrastructure policies S1 – S3**

5C3.4.9 Overall it is considered that Policies S1 (safeguarding existing community premises), S2 (new or improved community premises) and S3 (schools) will likely result in positive effects on the attainment of SA Objective 3. To augment positive effects it is recommended that policy S2 (a)(i) is amended as follows: 'the site or buildings are appropriate for their intended use *and are fully inclusive* and accessible to the community;'. In terms of policy S3, there may be some benefit of cross referencing clause (b) (which refers to loss of existing residential accommodation in C2 or C3 classes) with policy H8 which provides for housing to meet specific community needs. Recommendation 20 from SA Objective 2 on providing infrastructure to meet identified needs spatially is further endorsed against SA Objective 3.

**Recommendation 47:** That policy S2(a)(i) is amended as follows: 'the site or buildings are appropriate for their intended use *and are fully inclusive* and accessible to the community;'.  
**Recommendation 48:** That the policy team review the benefit of cross referencing policy S3(b) with policy H8.

**Reasonable Alternatives (RAs)**

*No RA have been identified for policies S1 and S2 and there have been no change in strategic approach from the adopted Core Strategy with regards to these policies. The RA identified for policy S3 schools is to allow schools in KIBAs. Dependent upon the location of KIBAs to residential areas, this alternative may in some circumstances improve accessibility to schools for parents and school children.*

**Transport policies T1 – T7 & T9**

- 5C3.4.10 Generally, it is considered that the transport policies will result in significant positive effects on providing an environment that is accessible to and fully inclusive for all people, improve accessibility to key services and facilities, and reduce the need to travel. New public transport infrastructure to address low levels of accessibility in some areas of the Borough, and improvements to existing infrastructure to be more accessible for use by disabled people and young families will likely be long term achievements, and rely on securing significant levels of funding. Accordingly deliverability for some projects (in particular those not listed in the Infrastructure Schedule, and those listed but with unknown funding) will likely be a barrier to some extent, at least in the short to medium term, in best achieving SA Objective 3 and it is uncertain whether such infrastructure will keep pace with expected growth.
- 5C3.4.11 Recommendation 24 on policy T5(d) and recommendation 5 on policy T6 (b) identified in appraisal of SA Objective 2 are further endorsed against SA Objective 3.

**Reasonable Alternatives (RAs)**

*No RAs have been identified for the transport policies except for parking policy T7 whereby the alternative was to devise our own parking standards rather than rely of London Plan parking standards. Any effect of this alternative on SA Objective 3 is considered to be de minimis.*

**Environment and green infrastructure policies EN1 and EN2**

- 5C3.4.12 It is considered that policies EN1 and EN2 should result in positive effects on SA Objective 3 as they seek to improve access to open space and healthy food. Recommendation 26 on Policy EN2 made in SA Objective 2 is further endorsed under SA Objective 3. It is recommended that policy EN1 (a) (iii) is amended to

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing. It is considered this would reduce opportunity to access locally grown food.*

‘public toilets’

**Quality of the Built Environment policies Q1, Q7, Q17, Q25**

- 5C3.4.13 Policy Q1 is an important policy in terms of SA Objective 3. It is considered that the supporting text at least should be amended to improve outcomes and interpretation of the policy as follows:  
‘The Council will expect applicants to use documents such as Planning and Access for Disabled People (DCLG) 2006 and CABE’s ‘The principles of inclusive design’, 2006 or any relevant updated replacement to inform their design approach and proposals.’
- 5C3.4.14 Policy Q7 on the urban design of public realm could be strengthened in terms of SA Objective 3 by adding ‘for all users’ to the end of clause (iii).
- 5C3.4.15 Sometimes shop fronts and entrances can be a barrier to disabled people, the elderly and people with pushchairs particularly those within historic buildings. It is considered that policy Q17, shop fronts, somewhat provides for these groups by clauses (iv) ‘adequate entrance doors’ and clause (vi) ‘have level entrances where possible’. However, coupled with other Local Plan policies, in particular policy Q1, significant positive effects for accessibility and inclusiveness should result.
- 5C3.4.16 It is further recommended that policy Q25 makes provision for an accessible continuous riverside walkway.

**Recommendation 50:** add ‘for all users’ to the end of clause (iii) Policy Q7.

**Recommendation 51:** amend supporting text of policy Q1 as follows: ‘The Council will expect applicants to use documents such as Planning and Access for Disabled People (DCLG) 2006 and CABE’s ‘The principles of inclusive design’, 2006 *or any relevant updated replacement* to inform their design approach and proposals.’

***Places and neighbourhoods policies PN1 – PN10***

5C3.4.17 In combination with other Local Plan policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN10) should result in significant positive effects in relation to SA Objective 3. This is particularly so because most of the major places and neighbourhoods seek mixed used development (e.g. Vauxhall, Waterloo, Brixton) and all policies seek public realm improvements such as linkages, permeability and connectivity as well as public transport accessibility and capacity improvements.

**5C3.5 ASSESSMENT OF SITES**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

All sites in Table 18 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 3.

**Table 17: Significance criteria for SA Objective 3: Access and Services**

Positive	Negative
<ul style="list-style-type: none"> <li>• Provides new community services and facilities in areas of need or improves existing access to such services and facilities.</li> <li>• Promotes mixed use development.</li> <li>• Site specific allocations: good accessibility judged as being located within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes of key services (schools, GPs, hospitals, food shops, banking facilities and post office).</li> <li>• Supports existing town and local centres.</li> </ul>	<ul style="list-style-type: none"> <li>• Worsens existing access to range of community services and facilities.</li> <li>• Poor provision of services and facilities in new development.</li> <li>• Site specific allocations: located more than 20 minutes of door-to-door journey time by public transport, walk, or cycle modes of key services (schools, GPs, hospitals, food shops, banking facilities and post office)..</li> <li>• Undermines existing town or local centres.</li> </ul>

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**TABLE 18: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 3: ACCESS AND SERVICES**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- Preferred use of site is for expansion of St Thomas's Hospital and replacement of existing affordable housing; therefore improves existing community service ad facilities</li> <li>- Public transport accessibility level is exceptional</li> <li>- supports existing town centre</li> </ul>		
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	<ul style="list-style-type: none"> <li>- preferred use is to improve existing facilities by expanding Sudbourne Primary School and therefore result in more local children being able to attend their local primary school (reduced need to travel)</li> </ul>	<ul style="list-style-type: none"> <li>- single use development however this addresses a priority need in the Borough by increasing number of school placements</li> </ul>	
3	Vale Street Depot, Vale Street SE27	<ul style="list-style-type: none"> <li>-preferred use is for education use or housing and retention of the reuse and recycling centre. Therefore it addresses identified priority need that benefits community services and facilities by allowing local children to attend their local school (reduced need to travel) and also provides local waste facilities in terms of recycling and reuse centre</li> <li>- good accessibility for local children and residents</li> </ul>		
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- mixed use development</li> <li>- good accessibility to healthcare, public transport, shops</li> <li>- public transport accessibility level is exceptional</li> <li>- supports existing town centre (Waterloo)</li> <li>- seeks to improve accessibility to Waterloo Station</li> </ul>		
5	Shell Centre, 2-8 York Road SE1	<ul style="list-style-type: none"> <li>- preferred use is mixed use employment led development including office, residential (including affordable housing), retails, cultural, sport, leisure, community facilities and replacement police facility</li> <li>- supports existing town centre</li> <li>- public transport accessibility level is exceptional</li> <li>- seeks to improve accessibility to Waterloo Station</li> </ul>		
6	Waterloo Station, Waterloo Road SE1	<ul style="list-style-type: none"> <li>- site has good accessibility to key services and facilities; improvements to the site also enable improved access to key services and facilities</li> <li>- seeks to improve accessibility to and around Waterloo Station</li> <li>- transport use and office and retail</li> <li>- supports existing town centre</li> </ul>		
7	Cornwall Road Bus Garage, Cornwall Road SE1	<ul style="list-style-type: none"> <li>- preferred use of the site is mix of activities including residential and commercial as well as replacement bus garage</li> <li>- supports existing town centre</li> <li>- site has good accessibility to key services and facilities; improvements to the site also enable improved access to key services and facilities</li> </ul>		

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		<ul style="list-style-type: none"> <li>- provides replacement community service (bus garage)</li> <li>- Public transport accessibility level is exceptional</li> </ul>		
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	<ul style="list-style-type: none"> <li>- preferred use of site is mix of uses including residential, employment and operational fire station</li> <li>- supports existing town centre</li> <li>- public transport accessibility level is exceptional</li> <li>- good accessibility to healthcare, public transport, shops</li> </ul>		
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	<ul style="list-style-type: none"> <li>- preferred use is mixed use development, employment, residential and potential location for a new primary school</li> <li>- public transport accessibility level is exceptional</li> <li>- good accessibility to healthcare, public transport, shops, education (reduced need to travel)</li> <li>- supports existing town centre</li> </ul>		
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	<ul style="list-style-type: none"> <li>- preferred use of site is town centre led mixed use development with employment, community uses and residential, and re-provision of a hostel</li> <li>- good accessibility to healthcare, public transport, shops</li> <li>- public transport accessibility level is exceptional</li> </ul>		
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	<ul style="list-style-type: none"> <li>-preferred use is town centre led mixed use development of retail, residential and bus station improvements</li> <li>- public transport accessibility level is exceptional</li> <li>- public realm improvements to accessibility</li> <li>- good accessibility to healthcare, public transport, shops</li> </ul>		
12	Somerleyton Road SW9	<ul style="list-style-type: none"> <li>- preferred use of site is mixed use development of residential, employment, community facilities, social enterprise and open space</li> <li>- supports existing town centre</li> <li>- good accessibility to healthcare, public transport, shops, community services and facilities and culture</li> </ul>		
13	Popes Road SW9	<ul style="list-style-type: none"> <li>- preferred use of site is mixed use development with retail, commercial, community, leisure, residential and town centre car and cycle parking</li> <li>- site provides opportunity for a replacement leisure centre</li> <li>- site re-provides adequate market facilities</li> <li>- public transport accessibility level is exceptional</li> <li>- good accessibility to community facilities, services, local shops</li> <li>- supports existing town centre</li> </ul>		
14	Brixton Central (between the viaducts)	<ul style="list-style-type: none"> <li>- preferred use of site is improvements to Brixton Station entrance and pedestrian links, creative and cultural industries, market support centre, mixed use retail, food and drink, community leisure and</li> </ul>		

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	SW9	<ul style="list-style-type: none"> <li>recreation uses, with potential for student housing</li> <li>- good accessibility to community facilities, services, local shops, food, employment</li> <li>- public transport accessibility level is exceptional</li> <li>- supports existing town centre</li> <li>- improved access and permeability proposed</li> </ul>		
15	SW2 Enterprise Centre	<ul style="list-style-type: none"> <li>- preferred use of site is civic uses with outdoor space, community facilities, retail, residential, employment</li> <li>- public transport accessibility level is exceptional</li> <li>- good accessibility to services, facilities, local shops, healthcare, employment</li> <li>- supports existing town centre</li> </ul>		
16	260 – 367 Norwood Road SE27	<ul style="list-style-type: none"> <li>- preferred use is retail led mixed use development including supermarket, housing, community uses, new public square</li> <li>- supports existing town centre</li> <li>- good accessibility to services, facilities, local shops, healthcare, employment</li> <li>- public transport accessibility level is very good</li> <li>- public realm improvements to include widening of pavements new public square and improved bus facilities</li> </ul>		

### 5C3.6 Summary of Local Plan policies and site allocations

5C3.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have significant positive effects on the existing baseline and ensuring that everyone has access to community services and facilities.

**Table 19: Summary assessment of effects of draft Local Plan on Access and Services**

Assessment of effects of draft Local Plan on SA objective 3	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
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>Generally, it is considered that the draft Local Plan contains good provisions for ensuring an accessible environment (i.e. urban design of public realm and buildings, housing and transport). To address existing baseline issues of poorer accessibility to community services for some residents in the Borough; it is critical that new social infrastructure is delivered in locations to address identified need (a recommendation has been made to ensure this is explicit in policy).</p> <p>Most of the site allocations have good accessibility and support existing town and local centres. Many of the sites promote mixed use developments, thereby further enhancing accessibility and seek to provide new community services and facilities in areas of need (for example schools on sites 2 and 3).</p> <p>There is also a level of uncertainty regarding delivery of transport infrastructure and additional school places, particularly in a timely manner before developments are occupied.</p>	<p>Improved accessibility of the built environment and to new open spaces is not likely to be seen until developments are completed, and this is not likely to occur until the mid to long-term.</p> <p>Large scale transport infrastructure considered necessary to keep pace with projected growth such as a replacement for the former Cross River Tram, extension of the Croydon Tramlink, northern line extension to Nine Elms and new station stop on the East London line extension at Brixton is unlikely to be seen until the long term, towards the end of the plan period due to nature of works and/or lack of identified and committed funding.</p>	Permanent

### 5C3.7 Recommendations for monitoring likely significant effects

5C3.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- 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 access to open space deficiency statistics
- Number of private vehicles owned by residents in the Borough
- Gross additional wheelchair accessible homes

## 5C4.0 INFRASTRUCTURE

5C4.0.1 This section of the SA relates to the sustainability performance of the Local Plan against:

- Objective 4: To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.

5C4.0.2 To achieve this objective the Local Plan needs to ensure that appropriate infrastructure keeps pace with population growth, in particular:

- Water and sewerage infrastructure
- Health 'infrastructure' (facilities and services)
- Schools
- Green infrastructure
- Transport.

### 5C4.1 Relevant policy objectives

#### National Level

5C4.1.1 The *National Planning Policy Framework 2012* contains many policies and references to infrastructure. Strategic policies should address provision of infrastructure delivery for transport, telecommunications, waste management, water supply, wastewater, flood risk and energy (including heat); and the provision of health, security, community and cultural infrastructure and other local facilities, including green infrastructure and schools.

#### Regional Level

5C4.1.2 The *London Plan 2011* contains a wide range of policies pertaining to various forms of infrastructure to support development. This includes infrastructure relating to green spaces, energy, social, business (including information and communications), water, sewerage and waste, and transport (including freight handling and waterway infrastructure). The Plan also provides policies on the Community Infrastructure Levy which helps fund necessary infrastructure.

### 5C4.2 Baseline conditions and existing issues

#### *Physical Infrastructure*

5C4.2.1 Existing public transport in Lambeth is already very well used and over capacity in some cases, and current improvements will not achieve the level of capacity increase that is needed. Some projects are underway to improve transport capacity, for example Waterloo station and platform upgrades, improvements to London Underground Victoria and Northern Lines to increase capacity, and extension of the East London line. Discussions are being had on extending the East London line to Clapham Junction (which would include a station at Clapham High Street).

5C4.2.2 Thames Water has two strategic sites in Lambeth: Daysbrook Road in Streatham, and Waterworks Road in Brixton. A recent project that has increased water supply capacity is the Thames Water Ring Main Extension which was a new build tunnel extension which linked the Honor Oak reservoir site in the London Borough of Southwark, to the Brixton pumping station in the London Borough of Lambeth.



- 5C4.2.3 The Distribution Network Operators (DNO) distributes electricity to homes and businesses. The DNO for electricity in Lambeth is EDF Energy. EDF Energy owns the EDF Energy Substation and Depot Site at 54 Bengeworth Road, SE5. EDF Energy states that this serves a significant catchment of London, providing electricity and supporting facilities to residents, businesses and London's central business district; that this is a key facility that forms part of the London electricity supply network and will remain so for the foreseeable future (at least 50 years); and that as such it is a facility of national security importance. EDF Energy advises that the structures on part of the site are outdated and surplus to operational requirements. EDF Energy is therefore investigating the scope for partial redevelopment of the depot site.
- 5C4.2.4 National Grid has one high voltage electricity underground cable which runs through Lambeth: the 275kV underground cable running from Wimbledon substation in Merton to Hurst sub-station in Bexley. National Grid has not advised of any future development plans affecting its electricity transmission infrastructure in Lambeth during the period of the Local Plan. National Grid has no gas transmission assets located within Lambeth.
- 5C4.2.5 Southern Gas Networks owns and operates the local gas distribution network in Lambeth. Southern Gas Networks have four gas holders at Kennington which are in their medium to long term storage strategy. There are currently no plans to decommission these gas holders. Gas connections are put in place when required but no large infill projects are currently planned in Lambeth.
- 5C4.2.6 Major Combined Heat and Power (CHP) and community heating schemes are in development at the Roupell and Ethelred housing estates, and through the Myatts Fields North housing estate regeneration (a Private Finance Initiative scheme). The Clapham Park Estate regeneration will involve two large scale energy centres with CHP, providing heat and hot water to over two thousand homes. South Bank Employers' Group is promoting CHP and community heating networks amongst commercial developers in South Bank area to build large scale energy networks. The King's College Hospital and Guy's and St Thomas' Hospital masterplans also set out future strategies for CHP.
- Social Infrastructure*
- 5C4.2.7 There are two major hospitals in the Borough each with A&E facilities. NHS Lambeth currently operates from 23 sites, of which 11 are owned and 12 leased. The preferred future model in Lambeth is for a Primary Care Neighbourhood Network comprising Neighbourhood Resource Centres ('hubs') and existing GP and dental practices ('spokes'). In addition to NHS Lambeth premises, primary care services are also provided by:
- 54 GP Practices
  - 59 Pharmacies
  - 40 Dental Practices
  - 20 Ophthalmic Practices
- 5C4.2.8 There are currently three ambulance stations in Lambeth: Waterloo (same location as current HQ/control centre); Brixton (Milkwood Road) and Streatham. Brixton and Streatham have recently been refitted and are fit for purpose; there are no plans to extend or relocate these.

- 5C4.2.9 There are currently four land fire stations in Lambeth:
- Brixton – 84 Gresham Road
  - Clapham – 29 Old Town
  - North Lambeth – 8 Albert Embankment
  - West Norwood - 455 Norwood Road
- 5C4.2.10 There is one river fire station in Lambeth opposite 8 Albert Embankment. Brixton, Clapham and West Norwood are all old facilities no longer fit for purpose. Redevelopment and/or relocation options are being explored. If relocation is required, this would need to be close to the existing site.
- 5C4.2.11 The number of school places in the borough is currently insufficient to meet future demand, both at secondary and primary level. It is estimated that approximately half of the 11-15 aged secondary pupils currently resident in Lambeth attend schools in neighbouring local authorities, or in the independent sector. There is also a need to meet the growing needs from population increase. It is the Council's aspiration to provide a year 7 place for 80% of pupils leaving primary school. There is a current shortage of primary school places to meet existing demand, and further places will be required to meet projected future population growth. The estimated current and future demand has identified particular shortages in Brixton, Norwood and Streatham.
- 5C4.2.12 Lambeth is one of fourteen local authorities which, because of its level of deprivation, will be expected to rebuild 20% of its primary schools, instead of the national target of 5%. This means that 30% of Lambeth primary schools will be refurbished.
- 5C4.2.13 Current provision includes 13 Secondary Schools, 61 Primary Schools, five Special Schools, five Nurseries and two Pupil Referral Units (*DfE Schools Census, 2012*). There are also 27 Children's Centres in the Borough.
- 5C4.2.14 Lambeth has a number of further and higher education establishments including King's College and Lambeth College (largest provider of adult and community learning in the Borough). King's College aims to be one of the top six universities in the UK, and one of the top twenty-five internationally. It plans to grow by 3,000 students over the next five to ten years. Its estate comprises five main campuses, of which four are wholly or partly in Lambeth. These are at Waterloo, St Thomas's, Guy's and Denmark Hill (which straddles the border with Southwark and is closely associated with King's College Hospital).
- 5C4.2.15 The Waterloo campus is particularly critical and includes four buildings. King's College wishes to expand to another site in the area and would like to see its Waterloo campus develop as an educational and cultural quarter linked to the South Bank. The shortage of good quality, affordable and local student housing has become an issue recently. An additional 1,000 beds are required to meet projected demand at King's. In addition to buying in accommodation from student housing providers, King's is looking at its own assets to provide accommodation, particularly for overseas and post-graduate students (*King's College London Strategic Plan 2006 – 2016*).

- 5C4.2.16 The Borough has four leisure centres – Flaxman, Briston, Ferndale, and Clapham – and one Lido facility at Brockwell. In addition there is a wide variety of sporting facilities which include:
- natural turf pitches
  - all weather astro pitches - 3rd generation and sand filled astro
  - redgra pitches
  - hard courts
  - MUGA surfaces.
- 5C4.2.17 Lambeth has nine libraries spread across the borough. All Lambeth's libraries are free to join and have access for people with disabilities. Brixton, West Norwood and the mobile libraries have induction loops. Brixton Library has a minicom facility.
- 5C4.2.18 West Norwood Cemetery is the only council owned burial space within the borough. Lambeth Council also owns and manages Streatham and Lambeth Cemeteries, both of which are located in the London Borough of Wandsworth. There is currently insufficient capacity in Lambeth cemeteries to deal with future demand for burials from Lambeth residents. Lambeth has two crematoria located in West Norwood and Lambeth Cemeteries
- 5C4.2.19 There are some cultural differences between communities around preferences for burial. Catholic communities have historically tended to have a preference for burial rather than cremation, but this is changing and cremation is becoming more common. Catholics do not necessarily require dedicated Catholic burial areas. Hindus and Sikhs prefer cremation. There is a specific issue in relation to Lambeth's Muslim communities which require burial with no casket (the body is wrapped in a shroud and placed straight into the ground) and prefer proximity to other Muslim graves. This means that concrete burial chambers and intermediate graves (empty graves located between occupied graves) tend not to be acceptable. Muslim communities would prefer a dedicated Muslim burial area within Lambeth cemetery. This compounds the problem of insufficient burial space capacity in Lambeth's cemeteries.
- 5C4.2.20 Lambeth has some 270 hectares of open space, which amounts to almost 10% of its total area. However, the borough is intensively built up and there are limited opportunities to secure increases in large areas of additional open space. Lambeth has many highly valued areas of open space but in some parts of the Borough, particularly the north, this is in short supply relative to the level of resident population. With planned population increase, pressures on open space will become even more intense across the Borough.
- 5C4.2.21 The Council has successfully secured eight prestigious Green Flag Awards which is the national standard for quality parks and open spaces. Archbishop's Park, Milkwood Community Park, Myatt's Fields Park, Ruskin Park, St. Paul's Churchyard and Vauxhall Park all have Green Flag Awards. St. John's Churchyard and Hillside Gardens Park were also recently awarded Green Flags.
- 5C4.2.22 Green infrastructure provision can be increased through green roofs. Lambeth Housing has incorporated green roofs in refurbishments including Ethelred Estate, redevelopments in Stockwell and Clapham.

### 5C4.3 Likely future evolution without the plan

5C4.3.1 While there are a number of national and regional programmes and projects specific for Lambeth Borough infrastructure; it is considered that in the absence of a Local Plan delivery of some infrastructure may be less co-ordinated in terms of addressing identified need in the local environment in a timely manner. The Core Strategy 2011 would remain the local development plan document for the Borough but without a new Local Plan, there runs a risk that the Core Strategy is not considered up-to-date and therefore not consistent with the NPPF.

5C4.3.2 The delivery of essential infrastructure needed to support population growth is critical. 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). Absence of the Local Plan increases risk that necessary and appropriate infrastructure is not delivered.

### 5C4.4 Assessment of Policies

#### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

5C4.4.1 The main policies relevant to achievement of SA Objective 4 are:

D1 – Delivery and monitoring	transport capacity
D2 – Presumption in favour of sustainable development	EN1 – Open Space
D3 – Infrastructure	EN5 – Flood risk
D4 – Planning obligations	EN6 – Sustainable drainage systems and water management
H10 – Gypsy and Traveller needs	EN7 – Sustainable waste management
ED1 – Key Industrial and Business Areas (KIBAs)	Q7 – Urban design / public realm
ED2 – Business uses outside KIBAs	Q10 - Landscaping
SI1 – Safeguarding existing community facilities	Q22 – Registered parks and gardens
SI2 – New or improved community facilities	Q24 – Undesignated heritage assets
SI3 - Schools	PN1 – Waterloo
T1 – Sustainable travel	PN2 – Vauxhall
T2 – Walking	PN3 – Brixton
T3 – Cycling	PN4 – Streatham
T4 – Public transport infrastructure	PN5 – Clapham
T5 – River transport	PN6 – Stockwell
T6 – Assessing impacts of development on	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 - Herne Hill

**Delivery and monitoring policies D1 – D4**

- 5C4.4.2 Policies D1 – D4 should result in significant positive effects, particularly policies D3 – Infrastructure, and D4 Planning obligations. Policy D3 seeks to safeguard and improve essential social, physical and green infrastructure to support growth, and work with partners to deliver additional infrastructure. An Infrastructure Programmes and Schedule is provided and this gives detail on a number of projects relating to transport, schools, parks and open spaces, Thames Tunnel, and waste infrastructure requirements. Accordingly, this schedule sets out infrastructure that is planned (or has already been delivered in 2012) to meet current and likely future demands. However, for some projects funding gaps have been identified which may threaten the deliverability of projects, for example transport, schools, health and open space improvement projects. Some projects require contingency planning. Policy D4 provides guidance on when section 106 planning obligations will be sought and this will help deliver infrastructure projects. Bullet point one of clause (b) could potentially be clarified to make sure the list provided is not definitive. It is therefore recommended that it reads: ‘on site provision of infrastructure, for example transport, education, health, ...etc’. This point also clearly states that provision of such infrastructure would be ‘on site’. While on-site provision would normally be preferred; there may be circumstances where off-site provision would be appropriate. Therefore, it is recommended that ‘on site’ is removed from the first bullet point of policy D4 (b).

**Recommendation 52:** Amend policy D4 (b) first bullet point to read as follows: ‘provision of infrastructure, for example transport, education, health, libraries, sport and leisure, emergency services, and cultural and community provision.’

**Housing policy H10**

- 5C4.4.3 This policy seeks to safeguard the existing gypsy and traveller site in Streatham Vale. It also seeks to identify a new site or sites for additional facilities over the lifetime of the plan. Identification and indeed delivery of an appropriate site in the Borough is considered a current matter of uncertainty.

**Economic development policies ED1 and ED2**

- 5C4.4.4 Policy ED1 safeguards business and industrial sites in the Borough. Known as Key Industrial Business Areas (KIBAs), only development related to business, industrial, storage, waste management, and green industries and ancillary uses will be permitted. Policy ED2 also seeks to protect sites and premises in business use. However, loss of land or floorspace in business, industrial, storage or in employment generating *sui generis* use into local community or cultural use (D1 class) will be considered where the proposal secures major planning priorities for which there is a demonstrable need which cannot be achieved in any other way. This therefore provides for social infrastructure generally (excludes leisure, sport and recreation), but not green infrastructure.

**Reasonable Alternatives (RAs)**

*The RAs identified for policy ED1 KIBAs included not having any KIBAs; allowing schools in KIBAs; allowing housing in KIBAs; and retaining KIBAs but reviewing boundaries based on the Employment Land Review and removing the exception of schools (as permitted by UDP). In terms of infrastructure, these alternatives may impact adversely on waste infrastructure provision given KIBAs have been identified as appropriate sites for waste management activities.*

*The RA for policy ED2 Business uses outside of KIBAs is to allow loss of employment generating uses; not have the exception of loss for D1 uses; and increasing the length of time a site must be marketed for B1 use before allowing residential use. In terms of SA Objective 4, it is considered that not having the exception of loss for D1 uses may result in some adverse impacts on provision of social infrastructure where there is an identified need for such infrastructure. Allowing more residential use of sites may also result in increased demand for infrastructure.*

### **Social infrastructure policies S1 – S3**

- 5C4.4.5 Overall it is considered that policies S1 – S3 provide a good foundation for social infrastructure in the Borough in relation to SA Objective 4. To reduce ambiguity three amendments are proposed for the supporting text. First, paragraph 7.8 of policy S1, third bullet point should require continuous marketing and advertising of a vacant site/building for D1 or D2 use. Second, paragraph 7.14 should refer to the tests of Policy S2 (a) rather than S1 (a). Lastly, paragraph 7.16 states that community facilities D1/D2 and relevant *sui generis* uses will be supported on employment sites (outside of KIBAS) if the tests of ED2 and ED3 are met. Policy ED2 refers to D1 use only. It is recommended the supporting text is amended to more accurately reflect policy ED2 and reduce uncertainties. Deliverability is a key issue. Annex 2 identifies considerable funding gaps for accommodating additional school placements. Adequate healthcare provision necessary for the expected growth at Vauxhall is also uncertain.

**Recommendation 53:** paragraph 7.8 bullet point three should be amended as follows: 'market and advertise the vacancy for D1 or D2 use *continuously* for a twelve month period...'

**Recommendation 54:** that the policy team reviews paragraph 7.16 in light of the test of policy ED2 (that only provides for D1 use not D2).

#### **Reasonable Alternatives (RAs)**

*No RA have been identified for policies S1 and S2 and there have been no change in strategic approach from the adopted Core Strategy with regards to these policies. The RA identified for policy S3 schools is to allow schools in KIBAs. This alternative may provide more opportunities and a wider site selection for the new school placements so critically needed.*

### **Transport policies T1 – T6**

- 5C4.4.6 Transport policies seek to provide and improve physical infrastructure to enable sustainable travel, including active travel through walking and cycling routes and river transport and will likely result in significant positive effects on physical transport infrastructure. Policy T1(c) seeks to ensure infrastructure keeps pace with population growth and demand by stating that development will be required to be appropriate to the level of public transport accessibility and capacity in the area, or to contribute towards increasing public transport accessibility and capacity where this cannot be achieved through TfL or other funding as appropriate. Further, Annex 2 provides detail as to future transport infrastructure improvements and projects, as well as funding information. Policy T4 outlines public transport infrastructure required for better connectivity, quality and capacity of transport and travel. The premise of the policy is commendable; it is the deliverability of such transport schemes in a timely manner that is of key concern given the level of growth the Local Plan supports.
- 5C4.4.7 It is noted that policies T1(c) and T6(b) are similar where the former states 'to contribute towards...increasing accessibility and capacity' and the latter states 'to contribute, at a level commensurate with the scale of the impact of the development to: increasing public transport capacity in the vicinity of the development'. The effect, if any, in implementation of these policies is unclear, and it is therefore recommended that these policies are reviewed by the policy team to ensure they are compatible with each other, are indeed necessary, and achieve intended purpose of the policies. It is considered both policies will likely result in positive effects on SA Objective 4.
- 5C4.4.8 Recommendation 22 on improving cycling provision of policy T3 (c) identified in the appraisal against SA Objective 2 is further endorsed under SA Objective 4.

**Recommendation 55:** that the policy team revisit policies T1(c) and T6(b) in terms of their compatibility and implementation (in particular level of contribution to public transport capacity) given they are similar.

**Environment and green infrastructure policies EN1 – EN3 and EN5 – EN7**

- 5C4.4.9 Policy EN1 seeks to protect existing open space, biodiversity, improve access to open space, and increase the quantity of open space including in areas of open space deficiency. The policy commences with 'The Council will meet requirements for open space by...'. It is unclear what the requirements are, and who they are set by or whether this will cause problems or uncertainty in future. It may be more appropriate to instead say 'The Council will manage open space by...'.
- 5C4.4.10 Clause (i) of policy EN1 refers to 'major planning priorities'. It is unclear how this would be defined. Policy ED2 uses this term as well and this is defined within the policy as D1 use class. It is recommended that the term is defined in terms of policy EN1.
- 5C4.4.11 It is considered that the policy (EN1) could be further strengthened by including green roofs and living walls, either into the actual policy (as enhancing biodiversity, increasing quality of open space, or contributing to creation or extension of green corridors). Any building proposed on an area of open space (e.g. under clause (iii)) should include a living roof or wall to help mitigate for the loss of green space. Green roofs, brown roofs and living walls make a valuable contribution to local biodiversity both intrinsically, and through providing 'stepping stones' or green corridors to enable species migration and increase overall habitat. It is considered that provision of living roofs and walls could be better provided for in the draft Local Plan. Policies EN2(b) and EN4(c) make reference to them, but the former only for major new residential developments and the latter 'where feasible and appropriate to the character and context of the development'. It is unclear how a living roof or wall would not be appropriate to the character and context of a development, and indeed how these would not enhance a local area. Given limited land supply in the Borough, coupled with development pressures and projected growth; it is recommended that policies EN1, EN2 and EN4 are reviewed with the aim of better incorporating provision of living roofs and walls in all development proposals.
- 5C4.4.12 The delivery of district heat networks is considered uncertain, particularly in terms of identifying sites for Energy Centres, but also in terms of access to land for pipework.
- 5C4.4.13 Policy EN5 addresses flood risk and contains policy to mitigate flooding from sewers which should be discussed with Thames Water Utilities Ltd; and policy on flood defences. Clause (g) states that on sites adjacent to the River Thames and River Graveney, maintenance, remediation and improvements to the flood defence walls will be required *where these are in poor condition* (emphasis added). It is considered that significant adverse effects could occur if flood defences are allowed to get to a state that is 'poor condition'. It is considered that such a situation should never arise whereby the defences are deemed to be in 'poor condition'. Regular maintenance and improvements would increase the likelihood that flood defences continue to be fit for purposes and their specific design standard maintained. Further, use of the word 'adjacent' is considered inappropriate with regards to maintenance of flood defences walls. As currently worded developments 'adjacent' to the rivers would include sites in the area of the river, including across the road that do not actually have flood defences. Development proposals should not adversely affect the functioning of flood defence walls, and accordingly they should be safeguarded.

- 5C4.4.14 Therefore, it is recommended that clause (g) is reviewed to ensure flood defences are proactively safeguarded and maintained to avoid or mitigate the process of defences deteriorating into poor condition. For example the policy could be amended as follows: Development proposals on sites abutting the River Thames and River Graveney will safeguard existing flood defence walls, and regular maintenance, remediation and improvements to the flood defence walls will be required to ensure these remain in good condition. In addition, developments on sites adjacent to defences and culverts should demonstrate that their development will not undermine the structural integrity or detrimentally impact upon its intended operation.' This will ensure that the physical infrastructure for flood defence remains robust and the level of flood risk is minimised, both now and in the future with projected growth. It is considered appropriate that developments on sites not abutting defences and culverts are required to demonstrate their development does not adversely impact this physical infrastructure.
- 5C4.4.15 Policy EN6 provides for sustainable drainage systems and water management. Overall it is considered that the policy should result in positive effects for water and sewerage infrastructure. The Thames Tunnel is a major infrastructure improvement, increasing capacity and reducing overflows of untreated sewage into the Thames. However, it is considered that the use of the word 'consider' in clause (i) weakens the intent of the policy which seeks to implement sustainable water management through Water Sensitive Urban Design (as the supporting text states). It is recommended the policy team reviews the use of this word. Alternatives include 'incorporate' and if necessary 'where appropriate' could go at the end of clause (i). Similarly it is considered that the words 'where appropriate' should be removed from clause (vi) to better ensure infrastructure does keep pace with population growth and; it is also recommended that clause (vii) is amended so as to include developments in the surrounding area. While this is stated in the supporting text, the proposed amendment requires consideration of cumulative impact.
- 5C4.4.16 It is considered that Policy EN7 on sustainable waste management makes good provision for safeguarding existing waste management sites and new sites in KIBAs and other appropriate locations, given the limited land supply in the Borough.

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing which would reduce extent of green infrastructure in the Borough. The RA for policy EN7 waste management is to allocate sites for waste management rather than indicate broad locations (as proposed). In terms of SA Objective 4, it is considered more appropriate to provide more flexibility in site selection to waste operators, to provide a more effective waste service in the Borough.  
No RAs have been identified for policies EN1, EN6 and EN7.*



**Recommendation 56:** that the policy team consider amending Policy EN1 to 'The Council *will manage* open space by...'

**Recommendation 57:** that the policy team define 'major planning priorities' with respect to policy EN1.

**Recommendation 58:** that policies EN1, EN2 and EN4 are reviewed with the aim of better incorporating provision of living roofs and walls in all development proposals.

**Recommendation 59:** That policy EN5 (g) is rewritten as follows:  
'Developments proposals on sites abutting the River Thames and River Graveney will safeguard existing flood defence walls and regular maintenance, remediation and improvements to the flood defence walls will be required to ensure these remain in good condition. In addition, developments on sites adjacent to defences and culverts should demonstrate that their development will not undermine the structural integrity or detrimentally impact upon its intended operation.'

**Recommendation 60:** Review the use of the word 'consider' in clause (i) of policy EN6.

**Recommendation 61:** Remove the words 'where appropriate' from clause (vi) policy EN6.

**Recommendation 62:** That clause (vii) of policy EN6 is amended to include the words 'and the surrounding area' at the end.

***Quality of the Built Environment policies Q7, Q10, Q22, Q24***

5C4.4.16 Overall it is considered that the built environment policies appropriately provide for the public realm infrastructure including green infrastructure through protecting landscaping features such as planting, habitats and registered parks and gardens.

***Places and neighbourhoods policies PN1 – PN10***

5C4.4.17 Overall, it is considered that the places and neighbourhoods policies make provision for infrastructure relative to scale of development proposed, in particular those places earmarked for significant growth, Waterloo, Vauxhall and Brixton. All policies seek to improve public realm and linkages for pedestrians and cyclists. Most policies also provide for transport accessibility and capacity improvements. Policies for Waterloo, Vauxhall, Streatham and West Norwood/Tulse Hill seek to provide new open space provision. Most of the policies also make provision for community services and facilities (the smaller centres like Clapham, Stockwell and West Norwood/Tulse Hill achieve this particularly well to ensure the continued vitality of these district centres). Provision of additional school places is included in the Brixton policy, and Waterloo will accommodate higher education uses but other policies should probably better address school place issues, e.g. Vauxhall. It is considered that policy PN2 on Vauxhall, specifically clause (h) on social infrastructure requires review as it is currently poorly worded. As already highlighted, delivery of infrastructure is a key concern. It is unclear if necessary health and education infrastructure in particular will be delivered in Vauxhall. The level of growth proposed for Brixton would benefit from a new station providing accessibility to north east London via the East London Line Extension.

**Recommendation 63:** that the policy team review and rewrite clause (h) of policy PN2 Vauxhall.

**5C4.5 Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

5C4.5.1 All sites in Table 21 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 4.

**Table 20: Significance criteria for SA Objective 4: Infrastructure**

Positive	Negative
<p>For all allocations:</p> <ul style="list-style-type: none"> <li>• sufficient water supply and sewerage capacity exists (or is planned) to accommodate the development and its future needs;</li> <li>• sufficient health 'infrastructure' (facilities and services) exists (or is planned) to accommodate the development and its future needs;</li> <li>• sufficient transport infrastructure exists (or is planned) to accommodate the development and its future needs;</li> </ul> <p>For residential site specific allocations:</p> <ul style="list-style-type: none"> <li>• sufficient school place provision exists, or increased capacity is planned, in the local area (school places to match school role projections);</li> <li>• site located within 400 metres of green space accessible by existing footpaths or cycleways. Site provides additional access to green space;</li> </ul>	<p>The infrastructure needs referred to in the '+ve' box are not in place or unlikely to be provided in the near future.</p>

**TABLE 21: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 4: INFRASTRUCTURE**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- improves existing health infrastructure</li> <li>- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs</li> <li>- site is located within 400m of green space (Jubilee Gardens and Archbishops Park)</li> </ul>	<ul style="list-style-type: none"> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.</li> <li>- Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1</li> <li>- Thames Tunnel</li> </ul>
2	47 – 51 Acre Lane, and land rear of Sudburne Road	<ul style="list-style-type: none"> <li>- improves social infrastructure i.e. school places</li> <li>- sufficient transport and health infrastructure exists</li> </ul>		
3	Vale Street Depot, Vale Street SE27	<ul style="list-style-type: none"> <li>- if site is used for education: improves social infrastructure i.e. school places</li> <li>- safeguards existing waste infrastructure (reuse and recycling centre) but loses depot for waste collection vehicles</li> </ul>	<ul style="list-style-type: none"> <li>- if site is used as housing and not education: insufficient school place provision currently exists as the area has been identified as an area in need of additional school places</li> <li>- site promotes private car use – public transport infrastructure is poor</li> <li>- play space/MUGA area may be lost although it is currently in a poor location for this use</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies, in particular policies D3, D4, ED2, S2, S3, T1 – T6, EN6, EN7</li> <li>- Thames Tunnel</li> </ul>
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs</li> <li>- site is located within 400m of green space (Jubilee Gardens and Archbishops Park)</li> <li>-sufficient health infrastructure currently exists and further improvements are planned</li> </ul>	<ul style="list-style-type: none"> <li>- Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools</li> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1</li> <li>- Thames Tunnel</li> </ul>
5	Shell Centre, 2-8 York Road SE1	<ul style="list-style-type: none"> <li>- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs</li> <li>- site is located within 400m of green space (Jubilee Gardens and Archbishops Park)</li> <li>-sufficient health infrastructure currently exists and further improvements are planned</li> <li>- replacement community facilities included as preferred use (police facility)</li> </ul>	<ul style="list-style-type: none"> <li>- Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools</li> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1</li> <li>- Thames Tunnel</li> </ul>
6	Waterloo Station, Waterloo Road SE1	<ul style="list-style-type: none"> <li>- improves existing transport infrastructure to increase capacity and accessibility</li> <li>-sufficient health infrastructure currently exists and further improvements are planned</li> </ul>	<ul style="list-style-type: none"> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies in particular policies D3, D4, T1 – T6, EN6, EN7</li> </ul>

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				and PN1 - Thames Tunnel
7	Cornwall Road Bus Garage, Cornwall Road SE1	<ul style="list-style-type: none"> <li>- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs as well as replacement bus garage provision either on site or an alternative site</li> <li>- site is located within 400m of green space (Jubilee Gardens and Archbishops Park)</li> <li>-sufficient health infrastructure currently exists and further improvements are planned</li> </ul>	<ul style="list-style-type: none"> <li>- Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools</li> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1</li> <li>- Thames Tunnel</li> </ul>
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	<ul style="list-style-type: none"> <li>- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs</li> <li>- site is located within 400m of green space (Spring Gardens and Archbishops Park)</li> <li>-sufficient health infrastructure currently exists and further improvements are planned</li> <li>- replacement community facilities included as preferred use (fire service)</li> </ul>	<ul style="list-style-type: none"> <li>- Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools</li> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN2</li> <li>- Thames Tunnel</li> </ul>
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	<ul style="list-style-type: none"> <li>- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs</li> <li>- site is located within 400m of green space (Spring Gardens and Vauxhall Park)</li> <li>-sufficient health infrastructure currently exists and further improvements are planned</li> <li>- identified potential location for a new primary school as well as mixed use development: meet school places demand</li> <li>- retains public house (social infrastructure)</li> </ul>	<ul style="list-style-type: none"> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN2</li> <li>- Thames Tunnel</li> </ul>
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	<ul style="list-style-type: none"> <li>- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs</li> <li>- site is located within 400m of green space (Spring Gardens and Vauxhall Park)</li> <li>-sufficient health infrastructure currently exists and further improvements are planned</li> <li>- new primary school proposed on adjacent site (Keybridge House)</li> </ul>	<ul style="list-style-type: none"> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN2</li> <li>- Thames Tunnel</li> </ul>
11	Plot bounded by Parry Street,	<ul style="list-style-type: none"> <li>- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs; and</li> </ul>	<ul style="list-style-type: none"> <li>- Water supply and sewerage capacity may be under increased pressure from extra demand</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with other draft Local Plan policies</li> </ul>

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	Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	retention of existing bus station - site is located within 400m of green space (Spring Gardens and Vauxhall Park) -sufficient health infrastructure currently exists and further improvements are planned - new primary school proposed on adjacent site (Keybridge House)	although Thames Tunnel is planned.	in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN2 - Thames Tunnel
12	Somerleyton Road SW9	- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Hilmead Nature Garden and Loughborough Park) -sufficient health infrastructure currently exists and further improvements are planned	- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.	- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN3 - Thames Tunnel
13	Popes Road SW9	- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Max Roach Park) -sufficient health infrastructure currently exists and further improvements are planned	- Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.	- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN3 - Thames Tunnel
14	Brixton Central (between the viaducts) SW9	- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs -sufficient health infrastructure currently exists and further improvements are planned	- Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.	- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S2, T1 – T6, EN6, EN7 and PN3 - Thames Tunnel
15	SW2 Enterprise Centre	- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Rush Common) -sufficient health infrastructure currently exists and further improvements are planned	- Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.	- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN3 - Thames Tunnel
16	260 – 367 Norwood Road SE27	- sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (West Norwood Cemetery) -sufficient health infrastructure currently exists and further improvements are planned	- Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned.	- Compliance with other draft Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN8 - Thames Tunnel

5C4.6 **Summary of Local Plan policies and site allocations**

5C4.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will result in a mix of positive, and uncertain effects with regards to adequate infrastructure being in place in a timely manner to accommodate expected growth.

**Table 22: Summary assessment of effects of draft Local Plan on Infrastructure**

Assessment of effects of draft Local Plan on SA objective 4	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	-/+/?	++/?	The Local Plan makes clear that housing growth, economic development and environmental sustainability cannot be achieved without a wide array of essential infrastructure. The Local Plan policies provide good context and provision for the different kinds of infrastructure required to meet current and future demands. Accordingly much required infrastructure is planned. Some infrastructure improvements such as upgrades of Northern and Victorian underground lines have recently been completed. However, there remain uncertainties about the delivery of essential infrastructure required for growth. These relate to timing – there is a real risk that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front before occupation of development (this will likely impact Vauxhall given the extent of planning permissions already granted and likely to be completed before the extension of the Northern Line to Nine Elms); funding and land required – for some of the proposed infrastructure funding has not been identified (e.g. school place provisions, new rail station at Brixton, waste transfer station, heat networks) and; proportion of open space per resident is likely to reduce as the population increases whilst new open space opportunities are extremely limited thus potentially worsening open space deficiency area rates. Insufficiencies in burial space are likely to continue.	It is considered that some significant positive effects may actually result in the short term as upgrades and improvements to Underground Lines address capacity issues prior to new development completions. Infrastructure required to meet demands of occupied new development will likely not be provided until at least the medium to long term, and in some cases may be delivered after occupation of significant developments.	Permanent, however there will be temporary effects until necessary infrastructure is delivered (effects relating to construction and lack of infrastructure in the interim).

5C4.7 **Recommendations for monitoring likely uncertain effects**

5C4.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Annual update of infrastructure programmes schedule

## **5C.5 EQUALITY AND DIVERSITY**

5C5.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

Objective 5: To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion.

5C5.0.2 To achieve this objective, plan policies should promote equity and fairness between population groups, improve environmental conditions for Lambeth's deprived areas and deprived communities, reduce poverty and social exclusion, promote social cohesion within and between population groups, and enable social integration between minority groups and wider society.

5C5.0.3 The Local Plan is a development plan and cannot alone tackle all inequalities. However many planning policies can help to reduce inequality gaps, both directly and indirectly.

### **5C5.1 Relevant policy objectives**

#### National Level

5C5.1.1 *National Planning Policy Framework 2012* states that planning policies and decisions should aim to achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centre and active street frontages which bring together those who work, live and play in the vicinity.

5C5.1.2 A wide choice of high quality homes should be delivered that widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

#### Regional Level

5C5.1.3 The *London Plan 2011* contains a number of policies to tackle inequality and ensure equal life chances for all. Policies include appropriate social infrastructure for different groups, measures to improve health and addressing health inequalities. Boroughs should promote the effective management of places that are safe, accessible and encourage social cohesion, and planning, transport, housing, environmental, and health policies are integrated to promote the health and wellbeing of communities.

5C5.1.5 Policy 4.12 is on improving opportunities for all. In particular this policy seeks to improve employment opportunities for Londoners, to remove barriers to employment and progression and to tackle low participation in the labour market. The Plan acknowledges there are still large inequalities in access to jobs and levels of worklessness in the capital. Londoners from Black, Asian and minority ethnic (BAME) groups for instance are more than twice as likely to be unemployed as those from White groups.

5C5.1.7 Policy 7.2 on an inclusive environment require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design.

### **5C5.2 Baseline conditions and existing issues**

5C5.2.1 Lambeth is an extremely ethnically diverse Borough. The proportion of white British

people has decreased from 50% to 39% in the last 10 years (Census 2011). It is among the most densely populated local authorities in England, with over 11,300 people per km<sup>2</sup>. Lambeth's population is 303,100, which makes it the third largest population in inner London, after Newham (308,000) and Wandsworth (307,000) (Census 2011). The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. The borough is the 14<sup>th</sup> most deprived district in England, comparable with Southwark, Lewisham and Haringey, but less deprived than the most deprived London boroughs of Newham, Tower Hamlets and Hackney. 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.

- 5C5.2.2 Lambeth ranks 5<sup>th</sup> for Black African people. The proportion of Lambeth residents with African passports is in the top 10% in the country. The Borough has the second highest proportion of black Caribbean people in the country and has the highest proportion of people identifying themselves as Other Black in the country (Census 2011). The Borough also has sizeable Portuguese, Polish and Vietnamese communities.

*Potential issues affecting race / ethnicity*

- Accessing suitable affordable housing can be problematic.
- Fear of crime, racial abuse and discrimination can prevent the enjoyment of the public realm and accessing open space.
- Employment opportunities including affordable premises for small businesses and shops.
- The London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (March 2008), identified a requirement for a maximum of 10 additional pitches for gypsies and travellers in Lambeth (evidence base requires updating).
- Recently arrived communities can be more vulnerable to social isolation.

- 5C5.2.3 The gender split in Lambeth (49.8% male and 50.2% female) is similar to inner London and the country (both around 50-50).

*Potential issues affecting gender*

- In order for people (particularly women) to balance work and domestic responsibilities, there is a need to be able access employment and training opportunities close to home.
- Access to affordable childcare is a key factor to women engaging fully in the labour market.
- Personal safety and crime concerns mean that a safe and accessible public realm including walking and cycling routes are particularly important for women.

- 5C5.2.4 Overall not much is known about gender reassignment group in the Borough. People undergoing gender transition are more likely to be victims of hate crime and anti-social behaviour. Research conducted in the borough found that 29% of respondents avoided going to certain areas and 33% avoided going out at certain times of day/night (ESRO 2012). Lambeth is 6<sup>th</sup> highest in the country for registered same-sex civil partnerships (Census 2011).

*Potential issues affecting gay, lesbian, bisexual and transgender groups*

- There is understood to be a general lack of awareness of the way discrimination impacts on lesbian, gay, bisexual and transgender communities with regard to employment, housing, health services etc.
- Personal safety in public spaces is often an issue.
- Vauxhall in particular, has a high concentration of night time entertainment venues which cater to LGBT communities.



5C5.2.5 In August 2011, 12,690 Lambeth residents were in receipt of Disability Living Allowance, compared with 12,480 in May 2010. The PANSI system, produced by the Department of Health, that projects data from the Health Survey for England to a borough level suggests that there are 16,988 working age residents who have a moderate or severe physical disability in the borough, and 33,696 who have a common mental disorder. Of the 689 adults with learning disabilities receiving care and support in Lambeth, a very high proportion (334 people (higher than average for comparable local authorities)) are in residential care (Housing Strategy 2012).

*Potential issues for people with disabilities*

- Disabled people are more likely to experience worklessness than non-disabled people. It is important that new workplaces, employment and training facilities, as well as educational facilities, are accessible to all. (Accessible workplaces as well as ability to travel to work can be issues.)
- There are particular shortages of housing suitable for people with extra care needs, mental health needs and learning disabilities leading to a lack of choice and inappropriate housing.
- The public realm is often not fully accessible.
- Local access to social facilities and services.
- Access to public places can be a particular issue for people who may experience social phobias or anxieties.
- Lambeth has one of the highest incidences of mental health issues in the capital, particularly among those from ethnic minority backgrounds. There are a growing number of people with learning disabilities living in the borough.
- The risk of social isolation.
- Access to public transport.
- Neighbour noise (soundproofing), overcrowding, access to green spaces and community facilities and fear of crime can all impact on mental well-being. (This is an overarching issue that can affect all groups).

5C5.2.6 The age breakdown (sourced from State of the Borough Report 2011) for Lambeth is as follows:

- Under 20 years: 22.6%
- 20 – 44 years: 51.8%
- 45 - 59 years: 14.6%
- 60+ years: 10.9%

*Potential Issues affecting Older People*

- Older people are more likely to be living in poverty and suffering the associated effects of low quality and inappropriate housing. Many sheltered housing places in Lambeth are unpopular, and do not meet the need of older people in terms of space, facilities and location. Often, older people would prefer to carry on living in their homes.
- Safety and security can be a real concern for older people, both in their homes and in public and open spaces.
- Health, social care and other services including community facilities often do not meet the needs of older people by being poorly located and inaccessible. This can lead to social isolation.
- Convenient, inexpensive, safe and reliable public transport is particularly important to older people, along with specialist transport services such as dial-a-ride.
- Accessibility of the public realm.
- Fuel poverty.
- Greater vulnerability to the effects of flooding
- The number of those aged 85 in the borough is expected to increase which will significantly increase demand for care services.

*Potential issues affecting children and young people*

- Those aged under 15 years make up almost one in five residents in the borough.
- Child poverty and social exclusion is often caused by parents and guardians not having access to employment and training opportunities.
- The provision of high quality social facilities, including childcare, play and informal recreation, youth services and meeting places, sport, leisure, culture and educational facilities. Space for young people is a particular priority in those parts of the borough where levels of youth unemployment, crime and gang activity are high.
- A lack of access to free and inclusive play space and open space can hinder mental and physical development and independence. A recent audit highlighted geographical disparity in access to play across the borough, with a particular lack of facilities in the south of the borough, in West Norwood and Streatham. As the population of the borough increases, access to quality play provision will become an increasing priority across the borough as a whole.
- Concerns relating to crime, safety and vulnerability particularly in relation to street crime and road accidents.
- Reliable, safe and inexpensive (or free) public transport is required to enable young people to be independently mobile.
- Obesity is a growing problem among children and young people in the borough.
- For young people, concerns relating to anti-social behaviour focus on people using or dealing drugs.
- Lambeth has a high number of young people Not in Employment, Education or Training (NEET)
- There is current and future demand for additional school places in the borough at both primary and secondary level.
- Lambeth currently has the highest teenage conception rate in the UK although this is decreasing.

5C5.2.7 In terms of religion, 53% of Lambeth residents identify themselves as Christian, 7% as Muslim and 28% say they do not have a religion (Census 2011). Muslim residents are likely to be younger, more ethnically diverse and less economically active than the population as a whole. They are more likely to have a main language that is not English. Muslim residents are more likely to prefer accessing council services in person, which may reflect lower confidence with written English and therefore on-line services (Customer survey 2012). Christian residents are more likely to be older, more settled residents, often in social housing, although there are also substantial smaller groups from, for example, Poland, Africa and Portugal who are younger and less settled. Services for older people could be targeted at Christians through churches and faith networks, including support and to encourage accessing services on-line (Customer survey 2012).

*Potential issues affecting faith groups*

- In some areas of the borough there is a shortage of accessible places of worship and facilities for cultural and community activities. New, larger church congregations in particular struggle to find the right size of premises in appropriate locations.
- Accessing suitable affordable housing can be problematic.
- There is a shortage of burial space in the borough, particularly in order to meet the specific requirements of Muslim communities.
- Spirituality and faith are an integral part of an individual's well being.

5C5.2.8 Approximately 150 languages are spoken in the Borough. After English the main languages spoken are: Portuguese, Yoruba, French, Spanish and Twi (LBL 2012). Lambeth ranks 13<sup>th</sup> in the country for having no people in a household age over 16 with English as a main language and 20<sup>th</sup> for having no people of any age (Census 2011).

5C5.2.9 The Council owns and manages one gypsy and traveller site, located in Streatham Vale, which provides fifteen pitches. The Council is currently exploring options for

identifying a second site. Figure 3 illustrates extent of private sector dwellings in the Borough that are occupied by vulnerable (older, disabled) households (asset rich but cash poor). Further, it is estimated that 18% of households in the Borough are in fuel poverty (Housing Strategy 2012).

- 5C5.2.10 Appraisal of the draft Local Plan policies with respect to SA Objective 5 will include the following groups: race, religion and belief, age, language, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, disability, socio-economic factors, and health, and these will herein be referred to as equalities groups.

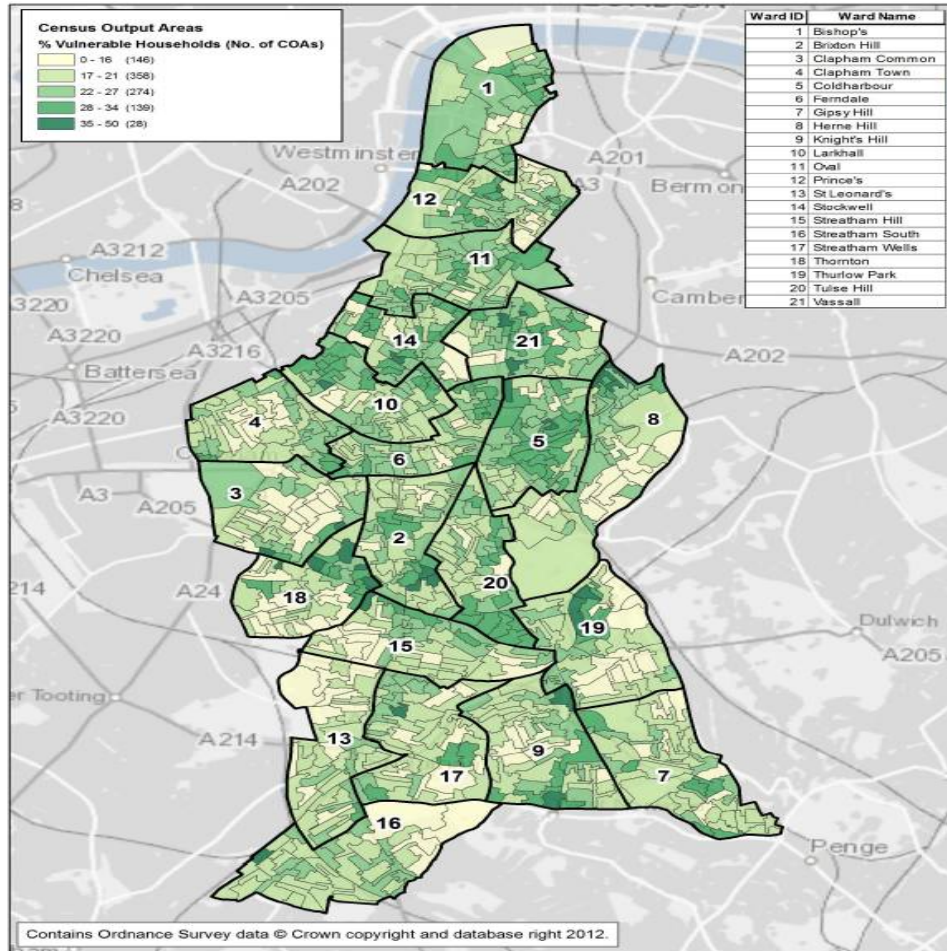


Figure 3: Percentage of private sector dwelling occupied by vulnerable households

### 5C5.3 Likely evolution without the Plan

- 5C5.3.1 The London Plan provides good provision of policies for ensuring equal opportunities and social cohesion; however the local context that the new Local Plan offers, in particular on improve environmental conditions for Lambeth's deprived areas and deprived communities will be lost in the absence of a new Local Plan for Lambeth.
- 5C5.3.2 Neighbourhood plans could be prepared. Provided these are in conformity with the National Planning Policy Framework and London Plan, they would likely be adopted and be a material consideration in assessing planning applications.

## 5C5.4 Assessment of Policies

### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

5C5.4.1 The main policies relevant to achievement of SA Objective 5 are:

D1 – Delivery and monitoring	T1 – Sustainable travel
D2 – Presumption in favour of sustainable development	T2 – Walking
D3 – Infrastructure	T3 – Cycling
D4 – Planning obligations	T4 – Public transport infrastructure
H1 – Maximising housing delivery	T7 – Parking
H2 – Delivering affordable housing	T9 – Mini-cabs, taxis and private hire vehicles
H3 – Safeguarding existing housing	EN1 – Open space
H4 – Housing mix in new developments	EN2 – Local food growing and production
H5 – Housing standards	EN3 – Low carbon and renewable energy
H6 – House conversions	EN4 – Sustainable design and construction
H7 – Student housing	EN5 – Flood risk
H8 – Housing to meet specific community needs	Q1 – Inclusive environments
H9 – Hostels and houses in multiple occupation	Q3 – Community safety
H10 – Gypsy and Traveller needs	Q7 – Urban design – public realm
ED1 - KIBAs	Q17 – Shop fronts and signage
ED2 – Business use outside KIBAs	PN1 – Waterloo
ED6 – Town centres	PN2 – Vauxhall
ED9 – Hot food take-aways near schools	PN3 – Brixton
ED10 – A2 uses	PN4 – Streatham
ED15 Employment and training	PN5 – Clapham
SI1 – Safeguarding existing community facilities	PN6 – Stockwell
SI2 – New or improved community facilities	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 - Herne Hill
	PN10 Loughborough Junction

#### ***Delivery and monitoring policies D1 – D4***

5C5.4.2 Policies D1- D4 will contribute towards the attainment of SA Objective 5 through working with a range of partners, delivering regeneration defined in Opportunity Area Planning Frameworks and local area master-plans (and these contain areas of the most deprived parts of Lambeth such as Brixton), including helping to promote and maintain mixed, balanced and diverse communities within neighbourhoods. The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth that result in inclusivity and equality of the Borough. Section 106 funding will provide or fund local improvements to infrastructure, including access to facilities, access to employment and affordable housing. Recommendation 52 made in SA Objective 4 is further endorsed with respect to SA Objective 5.

#### ***Housing policies H1 – H10***

5C5.4.3 Overall it is considered the housing policies should result in positive effects on SA Objective 5. By increasing the supply and range of housing, including affordable housing of mixed tenures and size, and including accommodation for people with care and support needs; housing provision will likely benefit all equalities groups, particularly those on low income levels and requiring specialist housing through providing greater housing choice and availability. Affordable housing should be provided on-site and be indistinguishable from other housing, and therefore should result in more equitable outcomes and feelings of social cohesion. However, if this cannot be 'practically achieved', policy states that off-site provision or even a payment in lieu may be permissible. Off site provision would need to be within 400m of the development site. This may not necessarily result in 'mixed and balanced communities' and therefore social cohesion may be compromised. A distance of 400m can result in a very different neighbourhood and environment. However, taking

land values and viability considerations into account, the policy needs to allow some flexibility in the location and provision of affordable housing. Payments in lieu may not directly or immediately result in availability of affordable housing, although it is considered that such payments could contribute to comprehensive and integrated estate regenerations (for example the emerging Estate Regeneration Programme) and supplement the Lambeth Housing Standard fund which may result in more positive effects than developers providing affordable housing just to meet policy requirements.

- 5C5.4.4 Net loss of affordable units is resisted unless estate regeneration meets tests outlined in policy H3. Similarly net numbers of existing housing is safeguarded, unless the loss arises from creation of family sized units (which will benefit particular equality groups such as pregnancy and maternity, socio-economic and health groups (mitigating overcrowding). To ensure mixed and balanced communities, a range of dwelling types, sizes and tenure is required. Policy H5 expects that homes will be built to Lifetime Homes standards, which will ensure that new homes are suitable for people's changing needs over their lifetimes and that they are wheelchair accessible. Children's play areas will be required in new developments expected to have ten or more children. Policy H8(c) makes further provision for this. Recommendation 16 that at least 10 percent of units are wheelchair accessible, made in SA Objective 2 and endorsed in SA Objective 3 is further supported with reference to SA Objective 5.
- 5C5.4.5 While the draft Local Plan makes provision for student housing; the priority use of land is meeting conventional housing and employment needs. The development of sites for student housing will be carefully managed and specific criteria will need to be met. However, it is not considered that the policy adversely affects student groups.
- 5C5.4.6 Policy H9 makes provision for new hostels and Houses in Multiple Occupation, and policy H10 sets out a commitment to safeguard the existing site for gypsy and traveller needs, and identify a new site for additional facilities for this group.

**Reasonable Alternatives (RAs):**

*The RAs identified for policy H2 Affordable Housing include always requiring affordable housing on site even if this means accepting a lower proportion (based on feasibility); always allowing affordable housing offsite; clearly defined criteria as to when off site would be allowed (proposed approach); and/or payment in lieu in exceptional circumstances to feed into existing stock of affordable housing (proposed approach). There were also alternatives considered relating to the percentage of affordable housing required (i.e. a lower threshold); varying the threshold across the Borough and not requiring affordable housing provision or payment on sites providing less than 10 units. In terms of SA Objective 2 it is considered that varying the percentage threshold for different parts of the Borough or the other alternative of always allowing affordable housing offsite may not result in equitable outcomes for all communities or best effect for mixed communities and therefore could have a detrimental effects with regards to equality. It is considered that always requiring affordable housing onsite (even if this reduced the amount) limits flexibility of the policy and therefore could have adverse impacts on provision of affordable housing and on those who rely on affordable housing provision. Requiring a lower percentage threshold (for example 30% rather than the proposed 50%) effectively reduces the target for developers and will result in less affordable housing being delivered in the Borough. In the interests of SA Objective 5 it is considered more appropriate to set a higher target and then if necessary negotiate with developers on the most viable scheme proposed for the site.*

*The RA identified for policy H3 Safeguarding existing housing is to not allow exceptional loss of residential units for nursery or childcare use. Provision of local nursery or childcare can help parents with their work/life balance which has beneficial effects for parents and young families. It is therefore considered that the alternative of not allowing in exceptional circumstances the loss of residential housing for childcare would likely result in some adverse impacts for local communities with regards to SA Objective 5.*

*The RA for policy H4 housing mix is having no percentage targets for affordable housing; and setting percentage targets for market housing. The risk of not setting percentage targets for affordable housing would be that family size may not always be delivered in schemes which would likely result in adverse effects in terms of SA Objective 5. Setting targets for market housing was considered unreasonable by the policy team who consider that such housing should be left to the market to determine. The policy encourages family size housing though and it is considered this is an appropriate approach with regards to SA Objective 5.*

*The RA identified for policy H5 is to produce Lambeth housing standards; adopt London Plan housing standards or; use a combination of both (i.e. London Plan for internal standards and Lambeth standards for external standards (as proposed). London Plan housing standards for external open space is lower than the proposed Lambeth standards. With regards to SA Objective 5, it is considered that the higher standards of open space / communal gardens included in the Lambeth standards offer increased space and likelihood of play opportunities for children and families to enjoy.*

*The RAs for policy H7 student housing include capping student housing levels when certain levels are met in certain areas; and setting a cap on student housing in Lambeth as a whole. Depending on the level of the cap; it is considered that these alternatives may not be conducive to creating an environment that is fully inclusive with respect to students.*

*The RA identified for policies H8 (housing to meet specific community needs) and H9 (hostels and houses in multiple occupation) include not resisting the loss of these housing types. In terms of SA Objective 5, this alternative would result in significant adverse impacts on several groups in the Borough, particularly elderly, disabled, poorer individuals and families, and homeless.*

*No RA are identified for policies H1 Maximising Housing Growth, H6 Housing conversions, and H10 Gypsy and Traveller Needs.*

#### **Economic Development policies ED1, ED2, ED6, ED9, ED10, ED15**

- 5C5.4.7 Policies ED1 and ED2 seek to protect and maintain sites and premises in business use thereby maintaining and/or increasing employment opportunities in the Borough and help address worklessness and poverty. Major redevelopment proposals will also need to re-provide independent individual shop premises on affordable terms, which will contribute to maintaining locally owned businesses and cultural and social values in the retail offer they provide. The policies contribute to increased access to localised employment which will benefit many equalities groups including women in terms of offering a better work and domestic life balance.
- 5C5.4.8 Policy ED6 seeks to safeguard local shops, specialist shopping and markets to meet community needs, which will support different cultural retail sectors. Through this the policy will assist those who are less mobile, such as older people, disabled people and those on low incomes by having these services accessible and local thereby reducing need to travel.
- 5C5.4.9 Policy ED9 is directed at school aged children attending primary or secondary schools and aims to reduce childhood obesity levels. While this particular group has been identified and singled out and it may be argued that the policy does not promote equity or fairness between population groups (i.e. other age groups); it is considered that the wider benefits to children and society generally outweigh any perceived unfairness. The policy positively contributes to the health equality group provided previous recommendations to policy are adopted.
- 5C5.4.10 Policy ED10 aims to manage over-concentration of A2 uses, particularly betting shops, pawn brokers and money shops. While some may consider this has a negative impact on low income groups (such as reduced selection of choice) it may also equally result in positive effects on this group by reducing opportunities to spend

money / get into debt (i.e. betting shops).

- 5C5.4.11 It is considered that policy ED15 should result in positive effects on attainment of SA Objective 5 by helping to ensure local jobs go to local people, and that these people have the necessary skills to partake in the employment opportunities offered by major development in the Borough. It will address worklessness, and poverty, including child poverty as well as provide opportunities for young people (but not limited to just the young) to get work through apprenticeships. It should also help women and caregivers in providing localised employment which can assist in maintaining or improving a better work/life domestic balance.

**Reasonable Alternatives (RAs)**

*The RAs identified for policy ED1 KIBAs included not having any KIBAs; allowing schools in KIBAs; allowing housing in KIBAs; and retaining KIBAs but reviewing boundaries based on the Employment Land Review and removing the exception of schools (as permitted by UDP). In terms of equalities, the provision of KIBAs helps local people gain local employment which in turn reduces poverty and social exclusion of local residents. For some deprived areas that currently have a number of KIBAs in the locality, the release of KIBA land may result in an improved environment, for example Loughborough Junction. While allowing housing in KIBAs gives rise to conflicts in amenities / reverse sensitivity issues / bad neighbour uses; in some areas the loss of KIBA land may be perceived as an improvement to the local area. However, there are wider impacts associated with the loss of KIBAs in terms of employment that need to be considered. Areas that include a number of KIBAs can be regenerated or improved without the loss of KIBA land.*

*The RAs for policy ED2 Business uses outside of KIBAs is to allow loss of employment generating uses; not have the exception of loss for D1 uses; and increasing the length of time a site must be marketed for B1 use before allowing residential use. In terms of SA Objective 5, it is considered that not controlling loss of employment generating uses would lead to adverse impacts related to access to local employment (including secondary effects such as child poverty, fuel poverty and mental illness associated with unemployment). In some circumstances it may be beneficial for particular groups, health and other reasons to allow loss of employment generating landuse for a local community or cultural use (D1 use) that meets an identified local need. In terms of SA Objective 5 it may be more beneficial to extend the length of time for marketing to ensure that the site is no longer suitable for employment generating uses, before allowing residential use into areas previously used for business or industrial uses (B1).*

*The RA for policy ED6 Town Centres is to not require re-provision on affordable terms for independent shop premises as part of major redevelopments. It is considered that this alternative would likely result in adverse impacts on SA Objective 5 in terms of accessing local food (particularly of different cultures), reduced social cohesion and connectedness of residents to their local centre, and adverse secondary effects associated with loss of local independent businesses.*

*For policy ED9 – Hot food takeaways near schools the RAs identified are to not have a policy on this issue at all; and to apply it in town centres. In terms of SA Objective 5, it is considered that effects of both alternatives would be neutral.*

*The RAs identified for policy ED10 A2 uses is to apply different percentages in different areas of the Borough and/or vary the definition of 'over concentration' (being defined as 25%). These approaches were dismissed as too difficult and there is no supporting evidence base. A further alternative approach is to have a policy specifically on pawn brokers and betting shops. However, these are A2 uses and it would be difficult to enforce particular uses within the A2 use class. In terms of SA Objective 5, effects of these alternatives are considered neutral.*

*The RA identified for policy ED15 skills and training was to require a financial contribution from developers for training schemes. However, this was dismissed as this would make the cumulative impact of policies unviable, and too onerous for the developer. If this could be a viable requirement in future, it is considered that such a financial contribution would have a positive impact with regards to SA Objective 5.*

**Social infrastructure policies S1 and S2**

- 5C5.4.12 Policies S1 and S2 support the provision of social infrastructure which should impact positively on poorer communities and on equality groups. Recommendation 47 of adding 'and fully inclusive' to policy S2(a)(i) made in the appraisal of SA Objective 3

is further endorsed under SA Objective 5. The exception and tests to allow residential accommodation for nursery or childcare use should benefit pregnancy and maternity, facilitating mothers and fathers back into work, tackle worklessness and poverty. Policy states that large residential schemes and comprehensive housing estate regeneration should include social infrastructure and local shops to meet local need and this should result in positive effects for all equality groups, particularly BME groups and those less mobile (disabled, older residents, and low income groups). It is considered the policies provide environments conducive for improved social cohesion and a more inclusive environment for those of different faith, race and language.

**Reasonable Alternatives (RAs)**

*No RAs have been identified for policies S1 and S2 and there has been no change in strategic approach from the adopted Core Strategy with regards to these policies.*

**Transport policies T1 – T4, T7, T9**

5C5.4.13 Transport policies T1 – T4 promote sustainable travel, including walking, cycling and use of accessible public transport. Policies seek to minimise the need to travel and reduce dependence on the private car which will benefit poorer residents (including those 50% of residents that do not have access to a private vehicle) and those less able to travel. The policies support improvements to public transport services which will be focused on maximising its use especially by people with disabilities, the elderly, young children and others for whom public transport accessibility is a barrier. Other barriers to public transport use will arise if it is too expensive, inconvenient, and unreliable or is felt to be unsafe so it is important the Council lobbies for improvements in these regards as well. In so far as planning policy is able; it is considered that policies T1 – T4 seek to address most of these barriers. Improvements to public transport infrastructure should have positive impacts on equality groups especially if they link deprived neighbourhoods with area of employment opportunity. There is a funding gap for the new station at Brixton connecting to the east London line extension so effects on equality groups and the wider population of Brixton are less likely to be maximised. The provision of safe and secure walking routes should have a positive impact on those who are more likely to suffer harassment in the streets, such as LGBT and BME groups. However, the whole journey experience needs to be accessible from leaving the house to arriving at the desired destination. As paragraph 8.4 states, all journeys, particularly those made by public transport, involve an element of walking. People with disabilities, and powered mobility scooters and wheelchairs users all use (or should be able to use) footpaths as part of their journeys. Accordingly, it is considered that policy T2 Walking could be improved to better reflect these users. As currently worded, the policy seems to discriminate against those that cannot walk (in the true sense of the word). Reference to 'improved accessibility for all' is recommended as this is not necessarily encapsulated within policy T4 clause (d) which is limited to new or improved public transport infrastructure (although it could be included within policy Q1 Inclusive environments).

5C5.4.14 Policy T7 on parking makes provision for disabled car parking in line with London Plan requirements. Clause (ii) of policy T7 may require clarification so that car club and pool car *parking spaces* are provided in developments. Paragraph 8.29 suggests that contributions will be required rather than actual parking spaces for car clubs and pool cars within developments that include housing. Provision of car clubs (aim is for a car club space within 400m of each other) will impact positively on equalities groups, particularly those with no access to a car, those that live in areas of poor public transport accessibility, disabled, older residents, and those on lower incomes / cannot afford to own and run a car. Accordingly it is recommended that policy



T7(a)(ii) is reviewed for clarity. For those groups that require it, the draft Local Plan makes provision of mini-cabs, taxis and private hire vehicles which will help address accessibility and safe travel.

**Recommendation 63:** Amend policy T2 Walking to include all users of footpaths, including those with disabilities. The policy should also require good accessibility for all users. For example, clause (a) could be amended to: 'Lambeth will improve conditions for all pedestrians, including those with disabilities, and make the walking environment safer, quicker, more direct, accessible and more attractive for all users.'

**Recommendation 64:** Review policy T7(a)(ii) as to whether parking spaces should be provided in developments specifically for car clubs and pool-car schemes. Supporting text suggests that only 'contributions' are required.

**Reasonable Alternatives (RAs)**

*No RAs have been identified for the transport policies except for parking policy T7 whereby the alternative was to devise our own parking standards rather than rely of London Plan parking standards. Any effect of this alternative on SA Objective 5 is considered to be de minimis.*

**Environment policies EN1 - EN5**

- 5C5.4.15 Policy EN1 will likely benefit all groups through providing new open spaces in areas of open space deficiency (or making financial contributions), and improving the quality of and access to existing open space, including the range of facilities available and biodiversity and heritage values. This will help encourage healthy lifestyles and mental well-being for those equalities groups at greater risk of ill-health (e.g. some children and young people, some older people, some women, some members of ethnic minority communities, people with a history of mental illness). The policy also safeguards cemeteries and burial space in the Borough, which will benefit particular faith groups. While policy Q1 ensures inclusive environments, it may be appropriate for the word 'accessible' to be included in clause (c)(i) of policy EN1 as follows: 'the provision of accessible open space in new developments...' which will ensure accessibility in its widest sense for example fully accessible for people with mobility problems or adequate signage for alternative routes. It is recommended this is reviewed by the policy team.
- 5C5.4.16 Policy EN2 enables access to cheaper or even free fruit and vegetables which will benefit lower socio-economic groups, reduce poverty and improve health and social inclusion / sense of community. Recommendation 26 on supporting food growing in all appropriate developments not just major new residential schemes is further endorsed against SA Objective 5. For example faith groups may like to have an area for food growing on their site.
- 5C5.4.17 Fuel poverty can be addressed through policies EN3 and EN4 which will help reduce energy bills and benefit lower socio-economic groups, the elderly and other groups struggling to provide a warmer home. In terms of flood risk; the location of housing in relation to health hazards is an important consideration for those who are less able to deal with the impacts of flooding, for example older people, people with disabilities, and children and young people. A key issue will be assessing the potential vulnerability of occupiers in flood risk areas including arrangements for safe access and egress.

**Recommendation 65:** Include the word 'accessible' in policy EN1(c)(i)

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing. It is considered this would be a lost opportunity with regards to SA Objective 5 particularly those most liable to experience poverty. The RA identified for policy EN3 is to provide Lambeth specific targets. However this was dismissed as there is no evidence base to support local targets. No RAs have been identified for policies EN1, EN4 or EN5.*

**Quality of built environment policies Q1, Q3, Q7, Q17**

- 5C5.4.18 Policy Q1 relates to new developments and this includes new buildings. It also includes outdoor areas and spaces of developments. It is considered that the supporting text could be strengthened to ensure the public realm including the interface to existing public realm environment is fully accessible and inclusive. This would better link to policy T2 Walking and provide better guidance to clause (a) of the policy. It is recommended that the following is added to clause (c): 'both within the development and with respect to the wider public realm environment'. Paragraph 10.1 (first sentence) should also be amended as follows 'All new development, including the wider public realm should be accessible...'
- 5C5.4.19 Recommendation 50 on policy Q7 made in appraisal against SA Objective 3 is further endorsed against SA Objective 5 (that legibility, permeability and convenient access is for all users).

- 5C5.4.20 Development and alterations to the built environment to create safe and secure environments that reduce crime, fear of crime and anti-social behaviour will benefit all groups but particularly women, the elderly, LBGT and BME groups.

**Places and neighbourhoods policies PN1 – PN10**

- 5C5.4.21 Waterloo lies to the north of Lambeth's most deprived areas. Policy PN1 should result in positive effects on all equalities groups. The policy will promote equitable outcomes and social cohesion through affordable housing, local jobs and training, improving public transport capacity, provision of social infrastructure including health, education, childcare, leisure, and promotion of mixed use developments.
- 5C5.4.22 Policy PN2 for Vauxhall seeks to create new jobs and homes, opportunities for affordable retail, the establishment of a well-funded community development trust that will further strengthen social infrastructure and play a lead role in nurturing a strong sense of distinctive character in this neighbourhood, and improved transport accessibility and connectivity. While the supporting text to the policy refers to the area supporting a number of LBGT nightlife venues, the needs of this and other target equality groups are not specifically referred to in the policy (although designs need be accessible for all, safe and sustainable and accommodate a rich mix of uses). Similarly the policy itself makes no mention of the active Portuguese community and their independent specialist food and retail outlets.
- 5C5.4.23 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. It is considered that Policy PN3 for Brixton should result in positive effects on all equality groups, but particularly for race and faith groups as the distinctive multicultural and diverse town centre is to be safeguarded and promoted through careful and sensitive regeneration. The Brixton market is supported; and there will also be expansion of arts, creative and cultural industries, mixed use developments, protection of employment opportunities, community uses, affordable and flexible workspace and improvements to public realm and public transport. Brixton is an area known for its significant levels of

deprivation and the policy seeks to address this in so far as planning policy can influence environmental factors on deprivation levels.

- 5C5.4.24 Policy PN4 for Streatham should result in positive effects on all equality groups, particularly those in the local area. Accessibility and use of public transport, walking and cycling will be supported through public realm and transport improvements. The policy also supports additional housing to provide a mix of tenures and range of new residential accommodation for new and local residents which suggests this includes C2 class. Additional cultural spaces and outdoor public space sufficient for a market is envisaged for Streatham Central, as well as refurbishment and extension of community facilities which will result in positive impacts for equality groups. Overall it is considered that the policy has a strong community focus.
- 5C5.4.25 Clapham has issues of deprivation (including Clapham Park Estate, the largest housing estate in the Borough). Clapham also has some of the most expensive housing. The policy for Clapham has a strong cultural, creative and community focus which will help contribute to more equitable outcomes, and achieve better social cohesion, sense of place and identity for local residents which will likely result in positive effects on equality groups.
- 5C5.4.26 Similarly policy PN6 on Stockwell seeks to create a distinguishable community focus and heart and a clear physical sense of place supported by its heritage assets. Improvements to and connections between housing estates are proposed which will benefit equality groups, particularly lower socio-economic groups in Stockwell.
- 5C5.4.27 Policy PN7 also seeks to improve the range and quality of employment and housing, and improve public realm linkages and quality. Policy PN8 for West Norwood/Tulse Hill seeks to increase the amount and quality of social infrastructure, like education and healthcare. Regeneration and improvement of existing housing estates will be supported as will development that meets educational needs in the Borough. The centre also seeks to provide training and investment schemes, traffic and transport improvements, employment, and community and cultural intensification at the Library and Norwood Hall. This policy has a strong community focus and should result in improved social cohesion and sense of place. Policy PN9 on Herne Hill supports the area as a small community focused district centre. A sense of place through its historic character is encouraged and there are public realm improvements proposed.
- 5C5.4.28 Policy PN10 for Loughborough Junction seeks to radically improve the physical environment of this deprived community. The policy has been co-produced with the Loughborough Junction Action Group (LJAG). Through the policy the Group aspire to creating an environment where all necessary services are within close walking distance of every home. Local energy efficiency initiatives are proposed which will help combat fuel poverty and other adverse effects this causes (for example physical health, mental wellbeing, reduced productivity).
- 5C5.4.29 An observation made for all policies (PN1 – PN10) is the reference to improving the environment for pedestrians. Interpretation of this would need to include all users of footpaths, including those in powered wheelchairs or scooters, and not just limited to those literally travelling by foot.

## 5C5.5 Assessment of Sites

### Likely significant effects of implementing Site Allocations, taking into account mitigation

All sites in Table 24 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 5.

**Table 23: Significance criteria for SA Objective 5: Equality**

Positive	Negative
<ul style="list-style-type: none"> <li>The allocation has the potential to provide new/improved services/facilities, including local employment for deprived areas and areas of opportunity.</li> </ul>	<ul style="list-style-type: none"> <li>The allocation will compete with services in deprived areas or in areas of opportunity.</li> </ul>

**TABLE 24: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 5: EQUALITY**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>provides improved services and facilities with regards to health</li> <li>affordable housing provision</li> </ul>		
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	<ul style="list-style-type: none"> <li>provides improved services and facilities in terms of education (school places)</li> </ul>		
3	Vale Street Depot, Vale Street SE27	<ul style="list-style-type: none"> <li>preferred use of site is education or housing and retention of reuse and recycling centre. The site is in an area of identified need for additional school places so this use would provide improved services and facilities with regards to education.</li> <li>Housing would also benefit equalities groups</li> </ul>		
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>mixed use development of residential and office further enhances area of opportunity</li> </ul>	<ul style="list-style-type: none"> <li>does not specifically states affordable housing*</li> </ul>	Compliance with other Local Plan policies including H2
5	Shell Centre, 2-8 York Road SE1	<ul style="list-style-type: none"> <li>mixed use development of office, residential, including affordable housing, cultural, sport, leisure and police facility</li> <li>enhances area of opportunity</li> </ul>		
6	Waterloo Station, Waterloo Road SE1	<ul style="list-style-type: none"> <li>enhances area of opportunity and seeks to increase transport capacity</li> </ul>		
7	Cornwall Road Bus Garage, Cornwall Road SE1	<ul style="list-style-type: none"> <li>mixed use development including residential and commercial and replacement bus garage</li> </ul>	<ul style="list-style-type: none"> <li>does not specifically states affordable housing</li> </ul>	Compliance with other Local Plan policies including H2
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	<ul style="list-style-type: none"> <li>provides improved services and facilities with regards to community facilities (fire service) and residential and employment in an area with some deprivation</li> </ul>		

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9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	<ul style="list-style-type: none"> <li>- mixed use development site with employment and residential and potential location for a new primary school</li> <li>- provides improved services and facilities with regards to school places</li> <li>- site in an area with some deprivation</li> </ul>	- does not specifically states affordable housing	Compliance with other Local Plan policies including H2
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	<ul style="list-style-type: none"> <li>- mixed use development site – town centre led with employment, community uses and residential</li> <li>- new hostel provision</li> <li>- Site provides improved services and facilities to deprived area and seeks to create an area of opportunity</li> </ul>	- does not specifically states affordable housing	Compliance with other Local Plan policies including H2
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	<ul style="list-style-type: none"> <li>- town centre led mixed use development site with retail and residential in deprived area and the site seeks to create an area of opportunity</li> <li>- local employment opportunities in retail provision</li> </ul>	- does not specifically states affordable housing	Compliance with other Local Plan policies including H2
12	Somerleyton Road SW9	<ul style="list-style-type: none"> <li>- mixed use development site of residential, employment, community facilities, social enterprise in a very deprived area of the Borough.</li> <li>- provides improved services and facilities</li> <li>- local employment potential in deprived area</li> </ul>	- does not specifically states affordable housing	Compliance with other Local Plan policies including H2
13	Popes Road SW9	<ul style="list-style-type: none"> <li>- mixed use development site of residential, commercial, community facilities, and leisure in a very deprived area of the Borough.</li> <li>- local employment opportunities in deprived area</li> <li>- provides improved services and facilities</li> </ul>	- does not specifically states affordable housing	Compliance with other Local Plan policies including H2
14	Brixton Central (between the viaducts) SW9	<ul style="list-style-type: none"> <li>- provides improved services and facilities in terms of public realm, mixed use retail and workspace, food and drink, leisure and recreation</li> <li>- provision of student housing</li> </ul>		
15	SW2 Enterprise Centre	<ul style="list-style-type: none"> <li>- redevelopment of site to provide additional community facilities, retail, residential and employment floorspace</li> <li>- provides improved services and facilities</li> <li>- local employment opportunities in deprived area</li> </ul>	- does not specifically states affordable housing	Compliance with other Local Plan policies including H2
16	260 – 367 Norwood Road SE27	<ul style="list-style-type: none"> <li>- retail led mixed use development of housing, community uses and start up accommodation for small businesses</li> </ul>	- does not specifically states affordable housing	Compliance with other Local Plan policies including H2

\*Some of the site allocations specifically mention provision of affordable housing where residential use is proposed for the site, while other site allocations do not. All site allocations will be subject to Local Plan policies.

## Summary of Local Plan policies and site allocations

5C11.14 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan policies and site allocations will have a positive effect on the recognising the existing baseline and in encouraging a sense of place, community identity and belonging.

**Table 25: Summary assessment of effects of draft Local Plan on Equality**

Assessment of effects of draft Local Plan on SA objective 5	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion	+ / ?	+ / ?	<p>Generally, it is considered that the draft Local Plan contains good provisions for ensuring equitable outcomes for all communities and achieving mixed and balanced communities. However, there is some uncertainty in the timely delivery of necessary infrastructure to support development. The draft Local Plan seeks to improve environmental conditions for Lambeth's deprived communities and areas, for example Brixton, Stockwell, Loughborough Junction). Policies seek to reduce poverty through a number of measures such as affordable housing, energy efficient homes and buildings, improved access to local employment and skills and training schemes and improved access to transport and daily amenities.</p> <p>It is also considered that the Plan contains good provisions for ensuring community services and facilities are provided and accessible to everyone. Perhaps the exception to this concerns those with disabilities in the external environment, footpaths, streetscape and open spaces; however recommendations have been made to address this. Interim works and development could cause an element of temporary disruption to those with disabilities.</p> <p>Most of the site allocations promote mixed use developments which will help foster mixed and balanced communities as well as provide accessible services, facilities and opportunities for employment. Some sites make specific provision for affordable housing, and others do not which may suggest there will be more emphasis on providing this on some sites and not others. The policy team may wish to review the need to include affordable housing as part of land-uses for site allocations as policy H2 requires affordable housing as part of all residential and mixed use developments.</p>	It is likely that positive effects on equality groups, particularly on improved housing (combating fuel poverty) and affordable housing as well as wider housing choices (specific to individual needs (i.e. vulnerable people) and demands (more family sized housing combating overcrowded conditions)) will be evident as new developments and are delivered. Supporting infrastructure (schools, health, transport, community facilities, open space) will be required but this needs to be delivered ahead of developments being occupied, and there is some uncertainty given the economic climate whether developers will be able to deliver this in such a timely manner.	Permanent  Possible temporary disruption to those with disabilities with improvements to public realm.

### 5C3.6 Recommendations for monitoring likely uncertain effects

5C3.6.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Annual update of infrastructure programmes schedule.

## 6. HOUSING

5C6.0.1 This section of the SA relates to the sustainability performance of the Local Plan against:

- Objective 6: Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.

5C6.0.2 To achieve objective 6 plan policies should increase access to good housing, meet affordable housing targets, meet sustainable housing standards, increase the mix and type of housing, including family units, reduce actual noise level and disturbances from noise, and tackle homelessness.

### 5C6.1 Relevant Policy Objectives

#### National Level

5C6.1.1 Paragraphs 47 to 53 of the *National Planning Policy Framework 2012* contain housing policies applicable to the Lambeth Borough. They provide policy on significantly boosting the supply of housing; Local Plans need to meet the full objectively assessed needs for market and affordable housing, and identify a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%.

5C6.1.2 The *Code for Sustainable Homes* is the national standard for the sustainable design and construction of new homes. The Government sets out standards in terms of energy efficiency (above those in the current building regulations) and sustainability. Standards include matters with respect to CO2 emissions, water, materials, waste, health and well-being, ecology and management.

#### Regional Level

5C6.1.3 The *London Plan 2011* contains a raft of housing policies on minimum borough housing annual average targets, optimising housing potential, housing design, choice (including gypsies and travellers), tenures, and affordability targets (including how to negotiate affordable housing on private and mixed use schemes).

5C6.1.4 The Mayor of London is producing a revised London Housing Strategy. This was published for consultation in December 2011 and consultations closed March 2012. The revised strategy looks further at enhancing mobility and choice, tackling housing need and rough sleeping, and improving options for home ownership.

5C6.1.5 The London Housing Design Guide 2010 sets out the Mayor of London's aspirations for the design of new housing in the capital. It clarifies, consolidates and sets new minimum space standards in a number of key policy areas. It promotes better neighbourhoods, high environmental standards, better accessibility and better design and includes new minimum standards for the amount of floor space and private outdoor space, as well as guidance on natural light and ceiling heights.

#### Local Level

5C6.1.6 The Lambeth Housing Strategy 2012-2016 sets out the priorities for housing in Lambeth for the next four years as well as year one's delivery plan. The Strategy focuses on three priority areas: Place - the role housing plays in making Lambeth a great place to live, work and visit; Property - the importance of good quality homes in Lambeth; and People - The role housing plays in improving the lives of those who live in it. The strategy is also underpinned by an updated Housing Needs Assessment.

## 5C6.2 Baseline conditions and existing issues

- 5C6.2.1 Lambeth's housing stock is typical of inner London, with a large proportion of flats – 73% in total of which about two thirds are purpose built and one third conversions – and a correspondingly small proportion of houses (Lambeth Residential Conversions Study 2009). Lambeth is in the top 20 districts nationally for proportion of shared ownership, council rented and private rented, and amongst the lowest for owner occupiers and mortgagees (Census 2011). There has been a marked decrease in the proportion of households renting from the Council from 29% (2001) to 20% (2011) and an increase in the proportion renting privately from 18% to 28%.
- 5C6.2.2 Lambeth's household composition profile is very similar to Inner London generally, with a high proportion of single person households, non-family households, and lone parents with dependent children. It has a low proportion of married / civil partnership families with children, and a low proportion of households wholly of people aged 65+. It is the highest number of non-family households (e.g. young people sharing flats) (Census 2011). There are around 130,000 households in Lambeth (Census 2011). Average household size in London increased from 2.35 persons in 2001 to 2.47 persons in 2011, buckling assumptions that average household size is generally in decline. Average household size increased in every London borough (Census 2011).
- 5C6.2.3 There is an urgent need for more affordable housing in Lambeth, especially for families. Over 1,750 new build affordable units have been completed over the past five years, yet there remains a significant shortfall in the availability of affordable accommodation, and a particularly pressing need to increase the amount of family sized affordable housing. In 2010/11 a total of 1,289 dwellings were completed. In addition 313 vacant dwellings were returned to use. The development 'pipeline' consisting of homes under construction and sites with unimplemented planning permissions totalled 5,545 at the end of 2010/11. Of the 1289 net completions, 694 were affordable, representing 54 per cent of net completions, and 50 per cent of gross completions, being affordable.
- 5C6.2.4 The number of people who have applied for social housing in Lambeth (excluding transfers from Council own and/or housing association stock) has increased by over 75% since 2006 – to 27,000 in March 2012. In December 2011 just over 9,000 households in Lambeth (6.8%) received housing benefit support to live in the private rented sector. The number of housing benefit claimants in the private rented sector increased by close to 200 people between February and December 2011, when changes to the Local Housing Allowance started to take effect. Over 60% of those living in council stock receive housing benefit.
- 5C6.2.5 Lambeth's 2012 Housing Needs Survey identifies an overall housing requirement across all tenures of 23,900 homes, to 2030. Of this, 67% is a need for social rented housing. In terms of mix, the survey suggests that the greatest overall requirement is for smaller (1 and 2 bed units) units (39% and 32% respectively). This reflects changing household composition, with one person households expected to account for 71% of household growth from 2011-31 (Lambeth Housing Strategy 2012).
- 5C6.2.6 While overcrowding has reduced from 26% to 22% over the last 10 years; Lambeth is amongst the worst nationally for households with too few rooms (Census 2011). There has also been a reduction in the proportion of terraced houses from 19% to 16%, and an increase in converted or shared flats from 45% to 49% over the last 10 years (Census 2011).

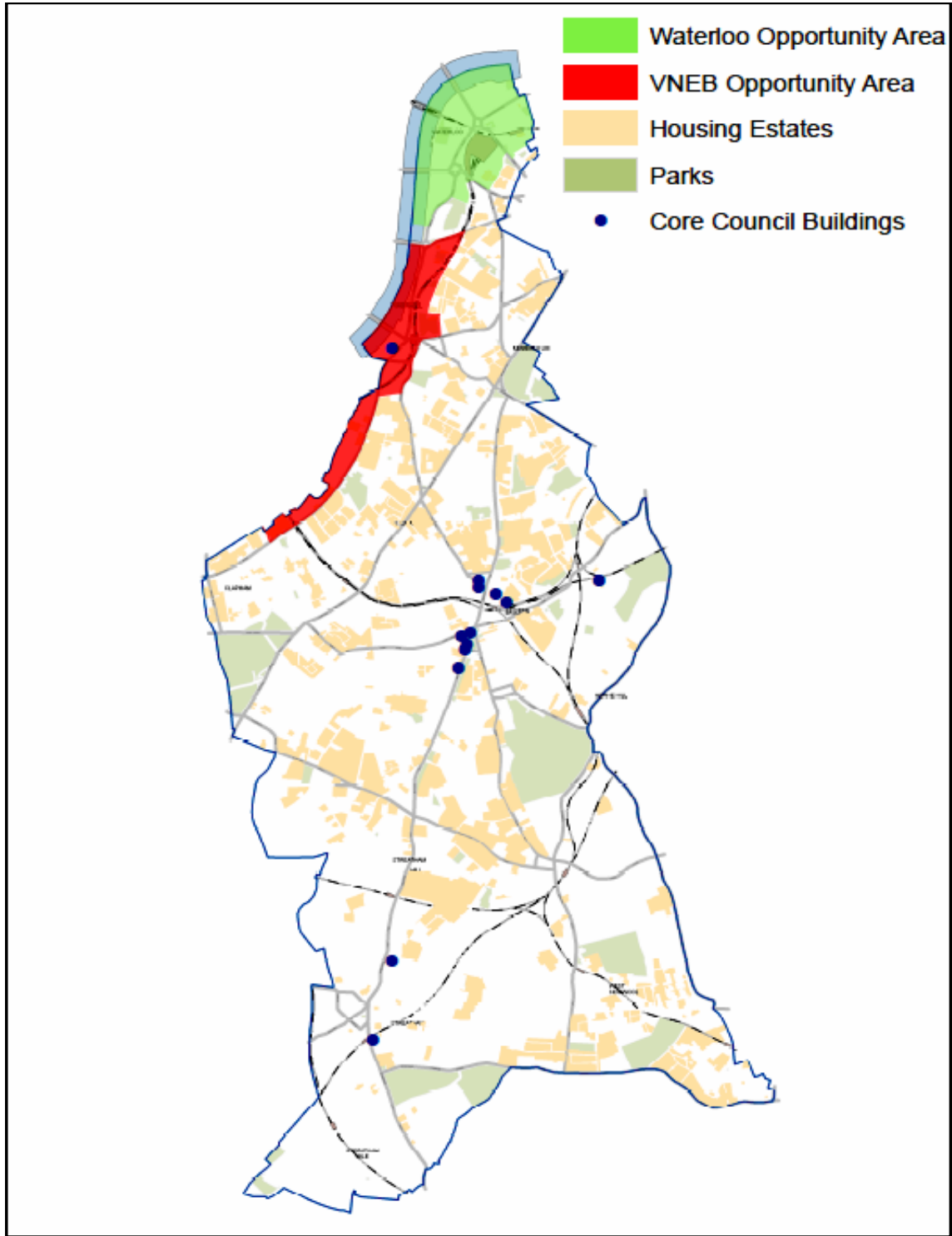


- 5C6.2.7 The average house price in Lambeth in March 2012 was £355,000. The average weekly private rent for a two-bed property in Lambeth is £288. Medium-high income households make up 26% of Lambeth's households. Low-medium income households make up 41% of all households. 32% of households are low income. Over 31% of all non homeowners in Lambeth have annual incomes of less than £20,000 (Lambeth Housing Strategy 2012).
- 5C6.2.8 Currently there are very few supported housing options available for adults with physical and / or sensory impairment who live in Lambeth, and limited access to specialised housing through, for example, shared ownership options. This has resulted in Lambeth having one of the highest levels of adults with physical and / or sensory impairment living in residential and nursing care homes in London (Housing Strategy 2012).
- 5C6.2.9 Lambeth Council owns 14% of land in the Borough and Figure 4 illustrates housing estates in the Borough. 969 households were accepted as homeless in 2011/12. Since April 2011 80-90% of new rough sleepers have not had more than one night sleeping rough (Housing Strategy 2012).
- 5C6.2.10 Existing purpose-built student accommodation in Lambeth provides 760 bedspaces at four locations, all of which are in the north of the borough. Over the past two years Lambeth has experienced an increasing number of development proposals for purpose built student accommodation.

### **5C6.3 Likely evolution without the Plan**

- 5C6.3.1 It is considered that the housing information in the Core Strategy is out of date with regards to student accommodation and affordable housing. Changing development pressures, such as several major proposals in recent months for student housing, particularly in Vauxhall (for example Tinworth Street, South Lambeth Road); the reality of negotiating affordable housing contributions on major sites (for example Elizabeth House in Waterloo, Sainsbury's on Wandsworth Road, Eastbury House on Albert Embankment); and the ongoing need to balance the supply of land for both housing delivery and economic growth has strengthened the need for an updated Local Plan. The London Plan sets a housing delivery target of 11950 new dwellings until 2021, and in the absence of a new Local Plan the target is unlikely to be achieved, delivery is likely to be ad hoc and may not necessarily deliver the type and size of housing needed for the Borough.
- 5C6.3.2 Similarly, housing policies are not considered up-to-date without a five year supply of housing delivery sites. Therefore, the Core Strategy may be deemed as out-of-date and therefore should development proposals be consistent with NPPF and London Plan policies then permission will need to be granted. Neighbourhood plans may be prepared that may not accommodate appropriate levels of housing in appropriate locations.
- 5C6.3.3 There is an increasing demand for housing and especially affordable and sustainable housing within the Borough. Absence of the Local Plan would not likely deliver the amount of affordable housing needed in 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.

Figure 4: Housing Estates in the Borough and Opportunity Areas



Housing Strategy 2012

## 5C6.4 Assessment of Policies

### Likely significant effects of implementing the proposed Draft Local Plan policies as a whole, taking into account mitigation.

D1 – Delivery and monitoring	T8 – Servicing
D2 – Presumption in favour of sustainable development	T9 – Mini-cabs, taxis and private hire vehicles
D3 – Infrastructure	EN4 – Sustainable design and construction
D4 – Planning obligations	Q1 – Access for disabled people
H1 – Maximising housing delivery	Q2 – Amenity
H2 – Delivering affordable housing	Q8 – Urban design / new development
H3 – Safeguarding existing housing	Q10 – Landscaping
H4 – Housing mix in new developments	Q12 – Building alternations and extensions
H5 – Housing standards	Q13 – Refuse / recycling storage
H6 – House conversions	Q15 – Development in gardens
H7 – Student housing	Q21 – Statutory listed buildings
H8 – Housing to meet specific community needs	Q23 – Conservation Areas
H9 – Hostels and houses in multiple occupation	PN1 – Waterloo
H10 – Gypsy and Traveller needs	PN2 – Vauxhall
ED2 – Business uses outside KIBAs	PN3 – Brixton
ED4 – Work-live development	PN4 – Streatham
ED7 – Changes of use within town centres	PN5 – Clapham
ED13 – Hotels and other visitor accommodation	PN6 – Stockwell
SI2 – New or improved community facilities	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 – Herne Hill
	PN10 Loughborough Junction

#### ***Delivery and monitoring policies D1 – D4***

5C6.4.1 Overall policies D1 – D4 should result in positive effects on SA Objective 6, in particular use of previously developed land and vacant buildings, and planning obligations that secure affordable housing.

#### ***Housing policies H1 – H10***

5C6.4.2 Policy H1 seeks to maximise the number of additional housing in the Borough to meet and exceed London Plan targets. This will include estate renewal and regeneration schemes as well as maximising affordable housing delivery. Accordingly, it is considered that the policy should result in significant positive effects for SA Objective 6, in particular increasing access to good housing; however the success of the policy is dependent on delivery of completions, in particular under current economic conditions. From 2005/06 to 2010/11 housing targets have been consistently met. However in 2011/12 the target of 1195 additional units was not met by 347 residential units. In addition there were 2150 outstanding unimplemented planning permissions for residential units.

5C6.4.3 Policy H2 states that on sites of at least 0.1 hectares or capable of accommodating 10 or more homes at least 50 percent of units should be affordable. Uncertainty may arise in defining a site capable of accommodating such dwellings, for example a taller building on the site will be more likely to accommodate more dwellings than a lower rise building or single detached homes. It is unclear whether 'homes' means houses, flats, or units or indeed whether in the context of this policy there is a difference in these terms. Similarly, what is the dwelling size or type that will trigger the policy? It is recommended that the policy contains consistent use of terminology and the supporting text is amended to address these uncertainties.

5C6.4.4 Clause (a)(ii) of policy H2 helps secure even more affordable housing in the Borough by seeking financial contributions from sites providing fewer than 10 residential units. It is considered that use of the words 'priority will be given' in clause (e) of policy H2 creates some uncertainty in implementation and it is unclear what this means in the

context of the policy. The supporting text is clear: provision of affordable housing suitable for occupation by families is a priority. Accordingly, the policy should be equally clear. It is recommended that clause (e) is revisited by the policy team. A suggested amendment is provided below:

‘(e) Affordable housing should comply with the preferred mix set out in policy H4 and rental levels should meet the needs of low income households within the borough, particularly with regard to family sized accommodation.’

- 5C6.4.5 The comments made in the appraisal against SA Objective 5 on the challenges of achieving mixed and balanced communities if affordable housing is provided off-site (within 400m of development site) remain relevant against SA Objective 6. Affordable housing provided off-site should be supported by appropriate social, physical and green infrastructure. It is recommended that green infrastructure provision is included in the supporting text of paragraph 5.21.
- 5C6.4.6 Overall it is considered that policy H2 will result in everyone having the opportunity for an affordable home. Through the policy, affordable housing targets should be met however; deliverability of housing completions may be uncertain, at least in the short term with the current economic climate.
- 5C6.4.7 Policy H3 makes provision for existing housing including affordable housing to be safeguarded and loss to be resisted except if specific tests are met. It is considered that policy H3 should result in significant positive effects in attaining SA Objective 6, particularly by increasing access to good housing, meeting affordable housing targets, and increasing the mix and type of housing including family units. This policy also supports proposals that bring back into use long term empty or derelict homes. This help ensure sufficient housing is proved and will also maximise use of existing infrastructure and minimise resource consumption.
- 5C6.4.8 Policy H4 seeks to increase the mix and type of housing, including family housing, and overall should result in significant positive effects in attaining SA Objective 6. However, the value of the word ‘normally’ is questioned in clause (a)(ii) on market housing, particularly when read against supporting text paragraph 5.35. Clause (a)(ii) states that a balanced mix of unit sizes including family sized accommodation *should normally* be provided (emphasis added). Paragraph 5.35 states ‘in all cases proposals will be expected to demonstrate that the provision of family units has been *maximised* (emphasis added). Further, it is considered that use of the word ‘should’ in clause (ii) allows flexibility in the mix of unit sizes (as provided for in the first sentence of paragraph 5.35), and ‘should’ is less onerous than ‘must’. It is considered that by removing the word ‘normally’, clause (a)(ii) better reflects the supporting text of paragraph 5.35 and will ensure family sized housing is provided in all market housing schemes. This proposed amendment to clause (a)(ii) would strengthen the policy while still reflecting supporting text paragraph 5.35. Alternatively, clause (ii) could be reworded as follows: ‘For market housing a balanced mix of unit sizes should normally be provided and proposals should include family sized accommodation’.
- 5C6.4.9 Policy H5 is on housing standards and applies to new residential development including new-build dwellings, conversions and change of use scheme where new dwellings are created. It is considered that the policy should also apply to major refurbishments and therefore recommendation 15 is further endorsed. Recommendation 16 made in appraisal of SA Objective 3 on provision of at least 10 percent of units being wheelchair accessible is further endorsed against SA Objective 6 in addition to SA Objective 5. Recommendation 17 referring to communal gardens

vs. outdoor amenity space is further endorsed in terms of SA Objective 6. Location dependent, the provision of the children's play space may impact adversely on some residents in terms of noise levels. This will need to be carefully managed as children's play space should be located in areas of good and safe accessibility and surveillance. It is unclear whether the external amenity space of 30m<sup>2</sup> for houses need be private or not.

- 5C6.4.10 It is considered that policy H6 on house conversions effectively seeks to retain family sized homes, and manage environmental effects such as noise, refuse storage, parking that result from conversions into smaller flats.
- 5C6.4.11 Policy H7 seeks to ensure that students have the opportunity for an affordable decent home. Rental levels of the accommodation will need to be supported by the Higher Education Institution to which the housing is linked to. The policy seeks to protect areas from overconcentration of student and similar housing that may be detrimental to residential amenity.
- 5C6.4.12 Policy H8 will likely result in significant positive effects as it provides housing specific to community needs and to those most disadvantaged and vulnerable, such as sheltered housing with care support, people with mental health or learning difficulties, residential care and nursing care homes, and extra care housing. The policy also seeks to provide housing capable of adaptations to enable residents to live independently and safely in their own homes. Where there is a loss of this housing proposed, the existing accommodation should be re-provided on site or elsewhere *within the Borough*.
- 5C6.4.13 Policy H9 will also likely result in significant positive effects as it makes provision for those people who cannot afford self-contained accommodation and therefore seeks to address homelessness provided such housing proposals are delivered. Policy H10 for gypsy and traveller needs recognises that an additional site is required, however such a site has not yet been identified. Given the limited supply of land in the Borough, additional provision for gypsy and traveller pitches will be challenging. However, the policy itself provides good criteria to identify a suitable site, both for intended occupiers, and existing residents in the local area of any future pitch site.

**Recommendation 66:** Review policy H2 and/or its supporting text in providing more clarification on what makes a site 'capable' of accommodating 10 dwellings, and what size or type do these houses need to be? For example would the policy apply to sites capable of accommodating 10 one bed units or studios?

**Recommendation 67:** Terminology across all policies and supporting text should be consistent unless it is specified that there is a difference in interpretation (homes, units, dwellings, houses).

**Recommendation 68:** Policy H2(e) – it is unclear what 'priority will be given' means or the value it adds to the policy. It is recommended that this is revisited by the policy team. A potential amendment is suggested: '(e) Affordable housing should comply with the preferred mix set out in policy H4 and rental levels should meet the needs of low income households within the borough, particularly with regard to family sized accommodation.'

**Recommendation 69:** It is recommended that green infrastructure provision is included in the supporting text of paragraph 5.21.

**Recommendation 70:** That the word 'normally' is removed by policy H4(a)(ii). Or For market housing a balanced mix of unit sizes should normally be provided and proposals should include family sized accommodation'.

**Reasonable Alternatives (RAs):**

*The RAs identified for policy H2 Affordable Housing include always requiring affordable housing on site even if this means accepting a lower proportion (based on feasibility); always allowing affordable housing offsite; clearly defined criteria as to when off site would be allowed (proposed approach); and/or payment in lieu in exceptional circumstances to feed into existing stock of affordable housing (proposed approach). There were also alternatives considered relating to the percentage of affordable housing required (i.e. a lower threshold); varying the threshold across the Borough and not requiring affordable housing provision or payment on sites providing less than 10 units. In terms of SA Objective 6 it is considered that varying the percentage threshold for different parts of the Borough may not result in everyone having opportunity for an affordable decent home. The alternative of always allowing affordable housing offsite may not result in best mix of housing types and is unlikely to result in an environment that is fully inclusive. In addition the Viability Assessment does not support this approach. It is considered that always requiring affordable housing onsite (even if this reduced the amount) limits flexibility of the policy and may result in less affordable housing provision in the Borough. Requiring a lower percentage threshold (for example 30% rather than the proposed 50%) effectively reduces the target for developers and will result in less affordable housing being delivered in the Borough which would result in adverse effects on SA Objective 6. .*

*The RAs identified for policy H3 Safeguarding existing housing is to not allow the exceptional loss of residential units for nursery or childcare use. While this alternative may result in more net housing in the Borough; the proposed policy only allows loss of housing in exceptional circumstances, and for a cause that will help local families.*

*The RAs for policy H4 housing mix include no percentage targets for affordable housing; and setting percentage targets for market housing. The risk of not setting percentage targets for affordable housing would be that family size houses may not always be delivered in schemes which would likely result in adverse effects in terms of SA Objective 6. Setting targets for market housing was considered unreasonable by the policy team who consider that such housing should be left to the market to determine. The policy encourages family size housing though and it is considered this is an appropriate approach with regards to SA Objective 6.*

*The RAs identified for policy H5 are to produce Lambeth housing standards, adopt London Plan housing standards or use a combination of both (i.e. London Plan for internal standards and Lambeth standards for external standards (as proposed). London Plan housing standards for external open space is lower than the proposed Lambeth standards. With regards to SA Objective 6, it is considered that the higher standards of open space / communal gardens included in the Lambeth standards offer improved opportunities for enjoyment of homes, including good provision for children's play areas. .*

*The RAs for policy H7 student housing include capping student housing levels when certain levels are met in certain areas; and setting a cap on student housing in Lambeth as a whole. Depending on the level of the cap; it is considered that these alternatives may not be conducive to providing everyone opportunity for an affordable home – if the cap is too low, then students will be adversely affected, and if the cap is too high other household types may be limited in supply.*

*The RA identified for policies H8 (housing to meet specific community needs) and H9 (hostels and houses in multiple occupation) include not resisting the loss of these housing types. In terms of SA Objective 6, this alternative may result in significant adverse impacts on ensuring vulnerable groups have access to appropriate housing. This alternative may exacerbate issues for elderly, disabled and homelessness.*

*There are no identified RAs for policies H1, H6 and H10.*

### **Economic development policies ED4, ED7 and ED13**

- 5C6.4.14 Policy ED4 provides for work-live developments although it is unclear what this term means and how it may or may not be different to 'mixed use' development. 'Live-work space' is defined in the glossary as 'the flexible use of buildings and space to allow both functions within them'. It is unclear if 'live-work space' is the same as 'work-live development' which is the subject of ED4. The policy would benefit from some supporting text for more information. Clause (d) of the policy seeks to manage adverse effects of home occupations (or work that takes place from the home where planning permission is required). It is recommended that clause (ii) includes 'for example' so that the listed effects are not definitive, otherwise there is a risk of missing something (for example vibration or odour effects). Use of the word 'extended' in 'extended hours of activity' may be problematic; it is unclear what 'normal' hours of activity would be and what would be defined as extended, when ultimately it should just be whether the hours of the activity do cause adverse impacts on residential amenity. The policy states that live-work development will not be supported in KIBAs. This approach is considered reasonable given other policies in the Local Plan. The policy states work-live development may be appropriate in town centres outside of the primary shopping areas subject to policy ED7. Residential above ground floor in primary shopping areas could provide a raft of significant positive effects including housing targets, improved economy and viability of town centres. It is recommended the policy team review this provision and allow residential above ground floor within the whole town centre boundaries.
- 5C6.4.15 Accordingly it is further unclear whether the Local Plan, in particular policies ED6 (town centres) and ED7 (changes of use within town centres), make provision for residential use above ground floor in town centres (including major, district and local centres). As mentioned, it is considered that provision of this adds to the vitality and viability of town centres, and increases opportunities for accommodating housing targets as well as improved safety and reduced crime in town centres. Paragraph 6.20 states 'Residential use of ground floor premises in town centres can detract from the vitality and viability of a parade or centre and can raise safety concerns'. This is the only reference to residential use in town centres, and perhaps it insinuates that residential use that is not on the ground floor might be acceptable particularly in line with recent amendments to permitted development rights of flats above shops. However, this is not made clear, in the policy or supporting text. It is recommended that policy ED6 and its supporting text is amended to provide for residential use

above ground floor. This should apply to the whole town centre, including within primary shopping areas and subject to policy ED7(c) in order to protect and maintain a stock of sites for business use.

5C6.4.16 It is clear that residential use on ground floor is not permitted in town centres (policies ED6 and ED7). It is considered that residential use above ground floor in town centres may be provided for in clause (c) of policy ED7, although this is not specifically mentioned. It is recommended that the Local Plan make provision and promote residential above ground floor in town centres provided that the primary retail core and commercial functions are not prejudiced. This complements places and neighbourhoods policies which promote mixed use development in town centres including housing. If this is the intention of clause (c) policy ED7 then the supporting text should make this clearer.

5C6.4.17 Policy ED13 is on hotels and other visitor accommodation (C1 use class). The policy states 'other visitor accommodation will be supported elsewhere in the borough...'. It is unclear what 'other' visitor accommodation could be given that hostels are provided for under policy H9. It is recommended this is reviewed by the policy team. It may be that the word 'other' is not necessary, or alternatively that the supporting text needs to provide guidance as to what are the other expected types of visitor accommodation.

**Recommendation 71:** that work-live developments is defined either in the glossary or supporting text of policy ED4

**Recommendation 72:** that supporting text is included for policy ED4

**Recommendation 73:** policy ED4 (d)(ii) is amended as follows: 'the nature and form of the work activity would not have an unacceptable impact on the residential amenity of the area through, for example, noise, servicing, good deliveries, traffic generation or hours of activity that would be likely to cause nuisance.'

**Recommendation 74:** It is recommended that the Local Plan make provision for residential use above ground floor in town centres. If this is the intention of clause (c) policy ED7 then the supporting text should make this clearer.

**Recommendation 75:** That the policy team review policy ED13 on whether there is other forms of visitor accommodation that are not included under C1 uses or hostels. If so, the supporting text should be amended.

**Reasonable Alternatives (RAs)**

*The RA for policy ED7 is other variations of percentages for ground floor retail units in primary shopping areas. This alternative is not considered to impact on SA Objective 6. The alternative for policy ED13 is to not control the loss of visitor accommodation. This would not necessarily result in more housing opportunity in the Borough. No RA has been identified for policy ED4.*

**Social Infrastructure policy S2**

5C6.4.18 In exceptional cases, loss of residential accommodation for a nursery or childcare use may be acceptable provided certain tests are met (policy H3 makes reference to this also). Policy S2 states 'exceptionally the use of residential accommodation...'. The supporting text provides guidance for proposals for nurseries and childcare facilities that involve the loss of existing residential accommodation. For consistency, and to avoid a situation where childcare facilities might concurrently occur within a house used for housing purposes; it is recommended clause (b) of policy S2 is



amended to 'exceptionally the loss of residential accommodation...'

**Recommendation 76:** Policy S2(b) is amended as follows: 'exceptionally the loss of residential accommodation for a nursery or childcare use may be acceptable where:...'

***Transport policies T8 and T9***

5C6.4.19 Servicing of sites / developments can impact adversely the amenity of an area and these effects may not be limited to just adjoining properties, for example, noise effects. To protect residential amenity of the wider area it is recommended that the last part of clause (a) of policy T8 is amended as follows:  
'...appropriate and acceptable in terms of impact on amenity of *adjacent* properties and road and traffic conditions of the location.'  
(Use of the word 'location' also suggests consideration of an area wider than those adjoining the subject site.) Similarly, the spatial extent of clause (c) is unclear. In line with the above recommendation the Construction Logistics Plan should demonstrate how environmental, traffic and amenity impacts will be minimised for the surrounding area. This may need to be explicitly stated in the supporting text.

5C6.4.20 Policy T9 on mini-cabs, taxis and private hire vehicles also seeks to protect residential amenity, and the supporting text states that traffic impacts will not be diverted onto surrounding streets, particularly residential areas. This further supports the above recommendations on managing impact on amenity of adjacent properties rather than adjoining properties only.

**Recommendation 77:** It is recommended that the last part of clause (a) of policy T8 is amended as follows:  
'...appropriate and acceptable in terms of impact on amenity of *adjacent* properties and road and traffic conditions of the location.'

The supporting text should be amended to reflect this proposed change, and also to ensure that the Construction Logistics Plan covers the surrounding area in terms of environmental, traffic and amenity impacts.

***Environment and green infrastructure policy EN4***

5C6.4.21 Policy EN4 states that all new homes approved before April 2014 should achieve a minimum of Code for Sustainable Homes Level 4. This is commendable and will result in good sustainable housing standards. However, as outlined in the appraisal against SA Objective 2 on health, it is unclear what the policy position would be after April 2014 but before 2016. Recommendation 30 is further endorsed that a minimum of 76 points should be required post April 2014. Clause (b)(ii) or the supporting text needs to provide targets for energy and water efficiency for when it is demonstrated that achievement of BREEAM Domestic Refurbishments 'very good' standard is not technically feasible or viable. It is also recommended that the supporting text makes it clear that the policy will be regularly reviewed during the plan period with the aim of increasing standards to 'Excellent' or 'Outstanding' as and when appropriate (subject to technology, costs etc).

**Recommendation 78:** that the supporting text makes it clear that the policy will be regularly reviewed during the plan period with the aim of increasing sustainability standards.

**Quality of Built Environment policies Q1, Q2, Q10, Q12, Q13, Q15, Q21, Q23**

5C6.4.22 Policy Q1 ensures that new dwellings are built to lifetime homes standards and are in line with GLA best guidance for wheelchair housing. Recommendations 36 to 38 for policy Q2 made in the health appraisal are further endorsed with regards to SA Objective 6. It is considered that the word 'stench' could be replaced with 'odour' in clause (v) of policy Q2 as even 'pleasant' smells (however that may be defined) may be unwelcome (for example smell of fast food) and provision of 'odour' encapsulates both stench and its antonym 'pleasant'. Policy Q10 makes provision for landscape design scheme and management and maintenance programmes for all residential developments (although it is considered that such schemes should be required for all applications not just residential developments). Landscaping improves residential amenity and enjoyment of homes and neighbourhoods and therefore policy Q10 will result in positive effects on SA Objective 6. Similarly policy Q12 should ensure extensions and building alterations are sympathetic to the design and character of the host building, locally distinct forms and heritage assets, including front gardens. Policy Q13 on refuse and recycling storage also seeks to protect residential amenity as does policy Q15 which does not support development in front gardens or prominent corner or side gardens; and there are specific requirements for proposals in rear gardens and undeveloped back-land sites in order to protect amenity and habitat values of these spaces. The typo in last line of policy Q15(b)(v) should be amended to '...or harm the character or appearance of a conservation area.'

5C6.4.23 The vast majority of listed buildings in Lambeth are residential terraces, semidetached houses and villas. Policy Q21 seeks to preserve and sustain the special interest and settings of these listed buildings, allowing people to enjoy their home and the local amenity. Policy Q23 on conservation areas also seeks to preserve and enhance the character or appearance of conservation areas, and will therefore result in positive effects on SA Objective 6, particularly for residents who have chosen to live within conservation areas because of the character and amenity that the environment offers. However, for some people, the policies may prohibit or impose limitations on any expansion of their home and therefore for some people the policies may not necessarily lead to enjoyment of their home. Overall, it is considered that the policies appropriately protect local amenity of residential areas.

**Recommendation 79:** Last line of policy Q15(b)(v) is amended to '...or harm the character or appearance of a conservation area.'

**Recommendation 80:** Policy Q2(v) replace 'stench' with 'odour'

**Places and neighbourhoods policies PN1 – PN9**

5C6.4.24 All places and neighbourhoods will need to comply with housing policies of the draft Local Plan. However, Waterloo policy specially makes provision for affordable housing, even though theoretically policy H2 requires affordable housing for all development proposals (more than ten units). The same can be said of site allocations. This may suggest that affordable housing is earmarked for some areas over others, which would be inconsistent with policy H2. Similarly, policy PN4 states that mixed tenure housing will be supported for Streatham Hill, despite this being required by policy H4. In Waterloo it is noted there may be tensions between the cultural / tourism / entertainment uses of the area and residential amenity, although it is considered this can be appropriately managed, for example, through suitable design and partnership working.

5C6.4.25 Policy PN2 on Vauxhall states 'mixed use development will be supported that contributes to the creation of this centre including town centre uses such as retail,

employment, housing, hotel, leisure...’ which suggests that housing is a town centre use. In light of the comments made above on residential use above ground floor in town centres; it is recommended that this policy is reviewed (or the town centre policies are reviewed) to ensure consistency in approach in the draft Local Plan to residential use in town centres. 16,000 new homes are proposed for the Vauxhall, Nine Elms and Battersea Opportunity Area. In Brixton, Streatham Central, Tulse Hill and West Norwood town centre sites the inclusion of housing as part of a mixed use development is supported. Additional housing that provides a mix of tenures and range of new residential accommodation for new and local residents is supported for Streatham Hill area. In Oval, it is unclear whether housing is supported. This could be due to the proximity to the adjacent gasworks. Policy PN7(b) suggests that housing may be supported: ‘...including appropriate reuse of the Oval House Theatre as necessary, as well as sites in the wider area, to improve the range and quality of employment and housing’. However the supporting text does not specifically mention the provision of housing for the Oval local centre. It is recommended that this is clarified by the policy team. Housing is supported to provide a vibrant district centre role in West Norwood/Tulse Hill area. Opportunities for new housing development will be supported on suitable sites.

- 5C6.4.26 Coupled with all housing policies, it is considered that the places and neighbourhoods policies should result in positive effects for SA Objective 6, particularly in increasing access to good housing.

**Recommendation 81:** Clarify whether housing is appropriate in Oval local centre and if so review supporting text.

**5C6.5 Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

- 5C6.5.1 All sites in Table 27 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 6.

**Table 26: Significance criteria for SA Objective 6: Housing**

Positive	Negative
<ul style="list-style-type: none"> <li>Provides new housing, including affordable housing, and a mix of housing types (including family units) in sustainable locations and sustainably designed.</li> </ul>	<ul style="list-style-type: none"> <li>Is likely to restrict the provision and variety of new sustainable affordable housing.</li> </ul>

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**TABLE 27: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 6: HOUSING**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- health use with replacement of affordable housing</li> <li>- sustainable location with exceptional public transport links</li> </ul>	<ul style="list-style-type: none"> <li>- no net increase in housing</li> <li>- housing mix not stipulated</li> </ul>	<ul style="list-style-type: none"> <li>- compliance with housing policies in particular H4 on housing mix</li> </ul>
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	<ul style="list-style-type: none"> <li>- While preferred use is for education; site has been included in the SHLAA as a potential housing site (part of the site has planning permission for 100% affordable housing)</li> <li>- development on the site need to respect the amenity of the adjoining residential properties</li> <li>- design principles requires due consideration to the protection of the neighbouring residents in terms of visual intrusion, overbearing impact, loss of light, privacy, noise and disturbance</li> </ul>	<ul style="list-style-type: none"> <li>- preferred use of site is not for housing</li> </ul>	<ul style="list-style-type: none"> <li>- it is recommended that key design principles are amended so that adjacent properties are protected from impacts of education use in terms of amenity (rather than just the adjoining residents).</li> <li>- compliance with Local Plan housing and quality of built environment policies</li> </ul>
3	Vale Street Depot, Vale Street SE27	<ul style="list-style-type: none"> <li>- preferred use of site is for education or housing and retention of the reuse and recycling centre</li> <li>- design principles requires due consideration to the protection of the neighbouring residents in terms of visual intrusion, overbearing impact, loss of light, privacy, noise and disturbance; and respects the amenity of the adjoining residential properties</li> </ul>	<ul style="list-style-type: none"> <li>- housing may not be delivered on the site but school places are also a priority planning issues for the Borough</li> <li>- should the site be developed for housing; the site allocation does not specifically mention affordable housing provision nor housing mix</li> </ul>	<ul style="list-style-type: none"> <li>- it is recommended that key design principles are amended so that adjacent properties are protected in terms of amenity (rather than just the adjoining residents).</li> <li>- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.</li> </ul>
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- preferred use of site is office led development with residential so would provide new housing provision</li> <li>- sustainable location with good access to community facilities and public transport</li> </ul>	<ul style="list-style-type: none"> <li>- preferred amount of residential not provided</li> <li>- does not specifically states provision of affordable housing or mixed tenure and size</li> </ul>	<ul style="list-style-type: none"> <li>- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.</li> </ul>
5	Shell Centre, 2-8 York Road SE1	<ul style="list-style-type: none"> <li>- preferred use of site is mixed use employment led development with residential, including affordable housing, so new housing provision</li> <li>- sustainable location with good access to community facilities and public transport</li> </ul>	<ul style="list-style-type: none"> <li>- preferred amount of residential not provided</li> <li>- does not specifically states provision mixed tenure and size</li> </ul>	<ul style="list-style-type: none"> <li>- compliance with Local Plan housing and quality of built environment policies, in particularly policy H4.</li> </ul>
6	Waterloo Station, Waterloo Road	<ul style="list-style-type: none"> <li>- site identified as a potential housing site in the SHLAA</li> </ul>	<ul style="list-style-type: none"> <li>- preferred use of site is for railway terminal and transport interchange, ground floor active</li> </ul>	

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	SE1		uses, retail and office with a new city square - no housing provision proposed but site is not necessarily suited to housing	
7	Cornwall Road Bus Garage, Cornwall Road SE1	- preferred use of site is mix of central London activities including residential (at rear and on upper floors) - sustainable location with good access to community facilities and public transport	- preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size	- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	- preferred use of site is retention of operational fire station and mixed of uses including residential and employment - design principles seek to ensure both existing and new residential amenity is protected and new dwellings are located away from the viaduct; and that the development provides a mixed and balanced community with an acceptable mix, tenure split/distribution of residential accommodation - sustainable location with good access to community facilities and public transport	- preferred amount of residential not provided - potential conflicts with fire station and residential uses on same site/in close proximity	- compliance with Local Plan housing and quality of built environment policies - site allocation makes clear that residential amenity should be protected
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	- preferred use is mixed use development including residential, and potential location for a school - design principles seek to ensure amenity of new residential development is protected from noise, pollution and vibration from the railway viaduct; and dual aspect residential units in blocks adjacent to the railway viaduct; and protects the amenity of existing residential development - sustainable location with good access to community facilities and public transport	- preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size	- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	- preferred use is town centre led mixed use development with residential on the upper floors - design principles seek to ensure amenity of new residential development is protected from noise, pollution and vibration from the railway viaduct; and dual aspect residential units in blocks adjacent to the railway viaduct - sustainable location with good access to community facilities and public transport	- preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size	- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8	- preferred use of site is town centre mixed use development with residential on upper floors - sustainable location with good access to community facilities and public transport	- preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size	- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.

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	(Vauxhall Island Site)			
12	Somerleyton Road SW9	<ul style="list-style-type: none"> <li>- preferred use of site includes mixed use development of residential, employment, community facilities and open space</li> <li>- sustainable location with good access to community facilities and public transport</li> <li>- key design principles support development that protects amenity of existing residential developments, and ensures any new dwellings are dual aspect</li> </ul>	<ul style="list-style-type: none"> <li>- potential for housing decant on part of the site</li> <li>- preferred amount of residential not provided</li> <li>- does not specifically states provision of affordable housing or mixed tenure and size</li> </ul>	<ul style="list-style-type: none"> <li>- new housing development should result in net increase of housing provision on the site</li> <li>- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.</li> </ul>
13	Popes Road SW9	<ul style="list-style-type: none"> <li>- preferred use of the site is for mixed use development with retail, commercial, community, leisure, residential, and town centre car and cycle parking</li> <li>- sustainable location with good access to community facilities and public transport</li> <li>- key design principles support development that provides dual aspect residential units fronting onto Brixton Station Road; protects the residential amenity of the adjoining Canterbury Gardens estate; and protects the character of the adjoining conservation area and setting of the listed former St John's School</li> </ul>	<ul style="list-style-type: none"> <li>- preferred amount of residential not provided</li> <li>- does not specifically states provision of affordable housing or mixed tenure and size</li> </ul>	<ul style="list-style-type: none"> <li>- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.</li> </ul>
14	Brixton Central (between the viaducts) SW9	<ul style="list-style-type: none"> <li>- site identified as having potential for student housing</li> <li>- sustainable location with good access to community facilities and public transport</li> <li>- design principles will support development that proposes low building to protect the amenity of new residential development on Coldharbour Lane adjoining the site</li> </ul>	<ul style="list-style-type: none"> <li>- no housing provision proposed but site is not necessarily suited to housing</li> </ul>	
15	SW2 Enterprise Centre	<ul style="list-style-type: none"> <li>- preferred use of site includes residential as well as community facilities and employment floorspace</li> <li>- sustainable location with good access to community facilities and public transport</li> <li>- design considerations include respecting the amenity of adjoining residential occupants and the setting of St Matthew's Church</li> </ul>	<ul style="list-style-type: none"> <li>- preferred amount of residential not provided</li> <li>- does not specifically states provision of affordable housing or mixed tenure and size</li> </ul>	<ul style="list-style-type: none"> <li>- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.</li> </ul>
16	260 – 367 Norwood Road SE27	<ul style="list-style-type: none"> <li>-preferred use of site is retail led mixed use development including housing</li> <li>- sustainable location with good access to community facilities and public transport</li> </ul>	<ul style="list-style-type: none"> <li>- preferred amount of residential not provided</li> <li>- does not specifically states provision of affordable housing or mixed tenure and size</li> <li>- no specific design considerations mentioned that recognise existing residential environment</li> </ul>	<ul style="list-style-type: none"> <li>- compliance with Local Plan housing and quality of built environment policies, in particularly policies H2 and H4.</li> </ul>

## 5C6.6 Summary of Policies and Site Allocations

5C6.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have significant positive effects on improving the existing baseline conditions, and ensuring everyone has access to decent, appropriate and affordable housing.

**Table 28: Summary assessment of effects of draft Local Plan for housing**

Assessment of effects of the Local Plan on SA objective 6	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	?/+	?/++	<p>On the whole, and incorporating SA recommendations; it is considered that the Draft Local Plan will generally have significant positive effects on the SA Objective. This is because the Draft Local Plan makes provision for new housing that will be of appropriate housing mix, type and size enabling social inclusion and the ability to remain in a community for a life time if so desired. Housing will be well designed both individually and with other buildings and the surrounding environment and all developments will need to incorporate affordable housing. It is considered that the housing policies make a significant contribution to positively addressing the key sustainability issues for housing, in Table 3. However, deliverability of housing completions (particularly in the short term and more likely in locations outside of Opportunity Areas) is uncertain given the current economic climate. Similarly, delivery of necessary infrastructure to support housing and associated population growth is uncertain. Provision of infrastructure or lack of will have significant impact on people's enjoyment of their home.</p> <p>To help meet housing targets and improve local economy, it is considered that residential above ground floor in town centres is appropriate (subject to marketing tests demonstrating no demand for business use).</p>	It is considered that the draft Local Plan provides the essential planning framework to accommodate housing that is decent, appropriate and affordable. However, there remains uncertainty on the delivery of the extent of housing proposed by the Local Plan, particularly in the short term. This is mainly in response to the current economic climate and depressed state of new house building trends of recent years. Given this, it is considered unlikely that significant amounts of new housing will be available in the short term (except perhaps in Vauxhall Opportunity Area), despite the extent of planning permissions for housing developments already granted. Therefore, access to decent, appropriate and affordable housing is likely to be a medium to long-term achievement; however delivery of new housing remains uncertain.	Permanent, provided affordable housing assigned as socially rented and intermediate housing remains so in perpetuity.

## 5C6.7 Recommendations for monitoring likely significant and uncertain effects

5C6.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Number of new dwellings permitted
- Number of new dwellings completed each year
- Number of new affordable dwellings built each year

## **5C7 LIVEABILITY AND PLACE**

5C7.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

Objective 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.

5C7.0.2 To achieve this objective, plan policies should enhance the quality and quantity of open space and the public realm; reduce the proportion of the public realm where noise precludes conversation or where other environmental factors (e.g. fumes) make it unpleasant to be; promote community engagement; promote interactions between different sectors of the community; promote good governance, promote wellbeing and help to make people feel positive about the area where they live; promote child-friendly buildings; and promote Lambeth as a place that people want to put down roots rather than just pass through.

### **5C7.1 Relevant policy objectives**

#### National Level

5C7.1.1 The *NPPF 2012* seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Planning policies should offer a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Further, planning policies should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

#### Regional Level

5C7.1.2 The 'London's People' chapter of the *London Plan (2011)* contains a raft of policies that all work together to help create a sense of place and community belonging. For example policies addressing equal life chances, health inequalities, communities mixed and balanced by tenure and income, housing affordability, accessibility, shared space principles, inclusive environments and improved public realm.

### **5C7.3 Baseline conditions and existing issues**

5C7.3.1 Lambeth has an even more ethnically diverse population than the rest of the capital. During the early post World War II period the borough became known as an important focus for the Black Caribbean population. It also has a growing African population and a large Portuguese-speaking community.

5C7.3.2 The total population change – that is, the proportion of people moving in and out of the borough – is often referred to as population churn. Official levels of population churn have been stable at around 22-24% for the last few years; this means that approximately 12% of the population leave each year and are replaced by around 10% new arrivals. In other words, around 88% of the population each year remains the same. In 2008-9, 34,400 people moved into the borough, and 35,700 moved out, a total churn of 70,100. This is 24% of the 2008 population. The population churn gives rise to significant pupil mobility within Lambeth schools. The average pupil mobility is 8.1% in primary schools and 4.5% in secondary schools. These rates of change are typical of inner London (SOB 2011).

5C7.3.3 Although levels of churn are relatively high, Lambeth is a largely residential borough with many long term residents. Data from the Lambeth residents' survey indicates



that 80% of Lambeth's population has been resident for over two years, and 65% over five years. High population turnover is not an inherently negative phenomenon, nor is it always caused by movement of transient, heavy users of public services. As well as short term international visitors, there are also many young, qualified migrants who work for a short time before returning home (who are often in the UK on two year working holiday visas). For example, one in six of all National Insurance numbers allocated to non-UK residents in Lambeth between 2002 and 2010 was to someone from Australia, New Zealand or South Africa, and a further one in seven was from Poland (SOB 2011).

5C7.3.4 The Borough is the 14<sup>th</sup> most deprived in England. This is worse than 2004, when the borough was ranked 23<sup>rd</sup> in England. This is a result of relative improvements in other boroughs and a decline in Lambeth in four of the seven areas that comprise overall IMD (Indices of Multiple Deprivation): income; health and disability; living environment; and access to housing and barriers to services. The other three areas are employment; education, skills and training; and crime and disorder, all of which remained the same or improved (SOB report 2008).

5C7.3.5 Many of Lambeth's neighbourhoods are already known and valued for their mixed communities that include both young and old, people with and without disabilities, a variety of income levels and the full range of ethnic and cultural backgrounds. The neighbourhoods of the future need to maintain and improve this mix while providing high quality, well serviced residential environments with a sense of place, in which people and families wish to settle and prosper.

5C7.3.6 At present, 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. Residents in some parts of the borough feel particularly strongly that families are an essential part of a stable community and that the loss of family housing to flat conversions is damaging this (Core Strategy 2011).

#### **5C7.4 Likely evolution without the Plan**

5C7.4.1 The current Core Strategy contains good provisions rejuvenating town centres, providing affordable housing, accessibility and protection of open spaces, all of which contribute to encouraging a sense of place, community identity and belonging. The National and Regional policies provide a good framework for promoting developments enhancing social inclusion, however they lack detail, for example, precise numbers of affordable housing and design characteristics appropriate for Lambeth. In the absence of a new Local Plan, Core Strategy policies could be considered out-of-date with National Planning Policy Framework, and Neighbourhood Plans could be prepared that propose a level or type of development that is consistent with national policy but may not be consistent with the Council's vision for Lambeth, or what the Council has traditionally supported.

#### **5C7.5 Assessment of Policies**

##### **Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation**

5C7.5.1 The main policies relevant to achievement of the SA Objective are:

D1 – Delivery and monitoring  
D2 – Presumption in favour of sustainable development

D3 – Infrastructure  
D4 – Planning obligations  
D5 - Enforcement

H1 – Maximising housing delivery	EN7 – Sustainable waste management
H2 – Delivering affordable housing	Q1 – Access for disabled people
H3 – Safeguarding existing housing	Q2 – Amenity
H4 – Housing mix in new developments	Q3 – Community safety / crime
H5 – Housing standards	Q4 – Public art
H6 – House conversions	Q5 – Environmental enhancement strategies
H7 – Student housing	Q6 – Local distinctiveness
H8 – Housing to meet specific community needs	Q7 – Urban design / public realm
H10 – Gypsy and Traveller needs	Q8 – Urban design / new development
ED4 – Work-live development	Q9 – Design quality / construction detailing
ED6 – Town centres	Q10 – Landscaping
ED7 – Changes of use within town centres	Q11 – Trees
ED8 – Night time economy and food and drink uses	Q12 – Building alternations and extensions
ED10 – A2 uses	Q13 – Refuse / recycling storage
ED11 – Loss of retail uses (A class) outside town centres	Q15 – Development in gardens
ED12 – Visitor attractions, leisure, arts and culture uses	Q16 – Boundary treatments
ED13 – Hotels and other visitor accommodation	Q17 – Shop fronts and signage
ED14 – Markets	Q18 – Advertisement panels and hoardings
S1 – Safeguarding existing community facilities	Q19 – Historic environment strategy
S2 – New or improved community facilities	Q20 – Westminster world heritage site
S3 – Schools	Q21 – Statutory listed buildings
T1 – Sustainable travel	Q22 – Registered parks and gardens
T2 – Walking	Q23 – Conservation Areas
T3 – Cycling	Q24 – Undesignated heritage assets
T4 – Public transport infrastructure	Q25 – River Thames
T5 – River transport	Q26 – Views
T6 – Assessing impacts of development on transport capacity	Q27 – Tall buildings
T10 – Telecommunications	PN1 – Waterloo
EN1 – Open space	PN2 – Vauxhall
EN2 – Local food growing and production	PN3 – Brixton
EN5 – Flood risk	PN4 – Streatham
	PN5 – Clapham
	PN6 – Stockwell
	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 – Herne Hill
	PN10 Loughborough Junction

### ***Delivery and Monitoring policies D1 – D5***

5C7.5.2 Overall it is considered that policies, in particular D1, D3 and D4, will result in significant positive effects on SA Objective 7. This is because the policies seek to ensure partners are involved in delivering sustainable development, that local distinctiveness is enhanced, infrastructure is in place to support growth and planning obligations are used for local improvements for example infrastructure, public realm improvements, and highways and traffic works. However, policy D5 states that enforcement will be prioritised according to the harm to amenity caused and resources available, and that investigations will be carried out proportionately in relation to the breach of planning control identified. It is arguable whether this promotes good governance, as identified in the sustainability framework as an appraisal prompt question for SA Objective 7. There is some concern that cumulative impacts may not always be avoided with this proposed policy approach.

### ***Housing policies***

5C7.5.3 It is considered that the housing policies should result in significant positive effects on SA Objective 7. New housing, including estate renewal and regeneration schemes, affordable housing, mix of dwelling sizes (including protection of family sized homes from conversion), as well as outdoor amenity spaces provided with housing, dwellings designed and built to lifetime home standards (policies H1 – H6), and provision of children's play space in residential developments all work to promote long-term social cohesion, sense of place, and help encourage people to put down roots in Lambeth.

5C7.5.4 The draft Local Plan also makes provision of housing to meet specified community needs, across a range of tenures. Policy H8 should result in more sustainable, mixed use social environments that promote social cohesion and where residents of this accommodation can feel a sense of place to the local area. Recommendation 45 on ensuring any loss of housing specific to community needs is re-provided on site or elsewhere within the Borough, made in the appraisal against SA Objective 6 is further endorsed with regards to SA Objective 7. Similarly, recommendation 16 on wheelchair provision in policy H5 is further endorsed against SA Objective 7. Continued safeguarding of the existing gypsy and traveller site should also result in sense of place feelings for gypsies and travellers, coupled with the Council's commitment to identify a new site for additional facilities.

**Reasonable Alternatives (RAs):**

*The RAs identified for policy H2 Affordable Housing include always requiring affordable housing on site even if this means accepting a lower proportion (based on feasibility); always allowing affordable housing offsite; clearly defined criteria as to when off site would be allowed (proposed approach); and/or payment in lieu in exceptional circumstances to feed into existing stock of affordable housing (proposed approach). There were also alternatives considered relating to the percentage of affordable housing required (i.e. a lower threshold); varying the threshold across the Borough and not requiring affordable housing provision or payment on sites providing less than 10 units. In terms of SA Objective 7 it is considered that varying the percentage threshold for different parts of the Borough or the other alternative of always allowing affordable housing offsite may not result in environments that promote social cohesion or promote interactions between different sectors of community. In addition the Viability Assessment does not support this approach. It is considered that always requiring affordable housing onsite (even if this reduced the amount) limits flexibility of the policy and therefore could limit accessibility to affordable housing. Requiring a lower percentage threshold (for example 30% rather than the proposed 50%) effectively reduces the target for developers and will result in less affordable housing being delivered in the Borough.*

*The RAs identified for policy H3 Safeguarding existing housing is to not allow exceptional loss of residential units for nursery or childcare use. Provision of local nursery or childcare can provide more liveable environments that encourage improved sustainable living and sense of place for families. It is therefore considered that the alternative of not allowing in exceptional circumstances the loss of residential housing for childcare would likely result in some adverse impacts for local communities with regards to liveability and place.*

*The RAs for policy H4 housing mix are no percentage targets for affordable housing; and setting percentage targets for market housing. The risk of not setting percentage targets for affordable housing would be that family size housing may not always be delivered in schemes which would likely result in adverse effects in terms of SA Objective 7. Setting targets for market housing was considered unreasonable by the policy team who consider that such housing should be left to the market to determine. The policy encourages family size housing though and it is considered this is an appropriate approach with regards to SA Objective 7.*

*The RAs identified for policy H5 are to produce Lambeth housing standards, adopt London Plan housing standards or use a combination of both (i.e. London Plan for internal standards and Lambeth standards for external standards (as proposed). London Plan housing standards for external open space is lower than the proposed Lambeth standards. With regards to SA Objective 7, it is considered that the higher standards of open space / communal gardens included in the Lambeth standards offer increased likelihood of accessibility to open space and children's play areas thereby increasing liveability and encourages better sense of place for residents. .*

*The RAs for policy H7 student housing include capping student housing levels when certain levels are met in certain areas; and setting a cap on student housing in Lambeth as a whole. Depending on the level of the cap; it is considered that these alternatives may not be conducive to creating an environment that is fully inclusive with respect to students.*

*The RA identified for policies H8 (housing to meet specific community needs) and H9 (hostels and houses in multiple occupation) include not resisting the loss of these housing types. In terms of SA Objective 7, this alternative would result in significant adverse impacts on social cohesion particularly for more vulnerable groups and would be unlikely to contribute to feelings of sense of place for these people and their families.*

*There are no identified RAs for policies H1, H6 and H10.*

***Economic Development and Town Centres policies ED4, ED6, ED7, ED8, ED10, ED11, ED12, ED13, ED14***

- 5C7.5.5 Overall it is considered that the economic development and town centre policies should result in positive effects on SA Objective 7. Recommendations made in SA Objective 6 on policies ED4 (clarification of work-live development) and ED6 (town centres, specifically provision of residential above ground floor) are further endorsed against SA Objective 7. Allowing residential above ground floor in town centres helps provide sustainable, liveable mixed use physical and social environments that promote long-term sustainable living, sense of place and social cohesion. Policy ED6 seeking to support the vitality and viability of town centres, for example protecting markets and areas of specialist shops, local shops and other local services will help promote interactions between sectors of the community and contribute to feelings of sense of place and social cohesion. The policy also contains design guidance in addition to the design policies in Section 10 of the draft Local Plan which further assists in producing well designed and liveable town centres.
- 5C7.5.6 With regards to policies ED6, ED7 (changes of use within town centres) and ED10 (A2 uses) it is recommended that the policy team review the interaction of these policies. It may be appropriate to cross reference policies ED6 and ED7 with the requirements of ED10, in the supporting text as a minimum or within the policies themselves.
- 5C7.5.7 Recommendations 1 and 2 for policy ED8 made in SA Objective 1 appraisal on crime are further supported with regards to SA Objective 7, particularly in terms of promoting wellbeing and making people feel positive about the area they live, and reducing the proportion of public realm where noise makes it unpleasant to be. However, it is considered that clause (c)(ii) may not necessarily result in significant positive effects in terms of SA Objective 7 by limiting food and drink uses to no more than 2 in 5 consecutive premises outside primary shopping areas and in local centres. Food and drink uses (includes cafes, pubs, restaurants) provide opportunities for community engagement, social cohesion, and interactions, and it is considered that clause (b) addresses adverse effects of such uses on residential areas and other sensitive uses, and that the primary shopping areas of town centres are protected through clause (c)(i). It is recommended clause (c)(ii) is reviewed by the policy team.
- 5C7.5.8 Overall it is considered that policy ED10 will result in positive effects on SA Objective 7. It seeks to control the number of A2 use premises in town centres, particularly betting shops, pawn shops and money shops which can lead to a negative impact on the vitality and viability of town centres, and/or increased perception of crime or fear of crime, including anti-social behaviour. It is considered that the policy contributes to making people feel more positive about the area they live, and a sense of pride and place for their local town centre. It is recommended that the word 'or' is added to the end of clauses (i), (ii) and (iii).
- 5C7.5.9 Policies ED11 – ED14 are also likely to result in positive effects on liveability and place. Policy ED12 seeks to support the arts and cultural use of the South Bank, and safeguard and improve other leisure, recreation, arts and cultural facilities in the Borough, all of which provide good social environments and promote community engagement. Policy ED14 makes provision for new markets provided that existing shopping facilities or markets located within town centres are not harmed. Clause (b) of the policy protects existing covered or street markets from retail developments. Off street markets (uncovered) are not included in clause (b). It is recommended this is reviewed by the policy team, although policy ED6 supports and protects market

areas and this would include off street markets. In all other respects it is considered that the policy valuably contributes to attaining SA Objective 7.

**Recommendation 82:** That the policy team review the interaction of policies ED6, ED7 and ED10 with the view of perhaps including references to policy ED10 in policies ED6 and ED7, or within their supporting text.

**Recommendation 83:** That policy ED8(c)(ii) is reviewed by the policy team in light of the appraisal comments.

**Recommendation 84:** Clarification that off street uncovered markets are protected under policy ED14 (in particular under clause (b)).

**Reasonable Alternatives (RAs)**

*The RA for policy ED6 Town Centres is to not require reprovision on affordable terms for independent shop premises as part of major redevelopments. It is considered that this alternative would likely result in adverse impacts on SA Objective 7 as smaller independent shops (including different cultural food offer) promote wellbeing and help different sectors of community feel positive about the area where they live. These smaller independent shops often promote interactions between different sectors of community and contribute to long-term social cohesion, sustainable lifestyle and sense of place of our local town centres. The analysis of centres in the Lambeth Retail Study demonstrates the important role independent traders play in providing diversity and maintain the health and vitality of centres.*

*The RA for policy ED7 is other variations of percentages for ground floor retail units in primary shopping areas. Unless the percentage change is a considerable deviation from the status quo (50%), it is considered unlikely that this alternative would result in significant adverse effects with respect to SA Objective 7. The percentage of retails needs to be such that it results in a thriving town centre that people want to visit, shop and interact with.*

*The RA identified for policy ED8 – Night time economy and food and drink uses would be to apply clause (c) to any major or district centre rather than just Waterloo and Vauxhall Opportunity Areas. This would mean there would be less control on the number of food and drink uses in major and district centres in the Borough. A further RA identified is to allow different percentage thresholds in different parts of the Borough. However this was dismissed as being too difficult/complex and had no supporting evidence base. Another alternative is to allow a higher percentage of food and drink uses on ground floor units in primary shopping areas (i.e. increased from 25% frontages). In terms of SA Objective 7, it is considered that the proposed policy approach is likely to result in more positive effects for the borough overall than the alternative approaches however, in some cases an increase in A3 uses, particularly cafés, might provide a stronger social cohesion in the local community.*

*The RAs identified for policy ED10 A2 uses is to apply different percentages in different areas of the Borough and/or vary the definition of 'over concentration' (being defined as 25%). These approaches were dismissed as too difficult and there is no supporting evidence base. A further alternative approach is to have a policy specifically on pawn brokers and betting shops. However, these are A2 uses and it would be difficult to enforce particular uses within the A2 use class. In terms of SA Objective 7, policy ED10 can have a significant impact on sense of place of an area. Any increase on the current 25% threshold would need to be carefully derived in order to achieve the right balance of A2 uses to other town centres uses.*

*The alternative for policy ED13 is to not control the loss of visitor accommodation. It is considered that effects of this alternative on SA Objective 7 would be de minimus. It may result in a different atmosphere in certain areas of the Borough, for example fewer tourists in Waterloo, which may have secondary impacts on the local economy which in turn may change liveability and sense of place of particular areas.*

*No RAs identified for policies ED4, ED11, ED12 or ED14.*

**Social Infrastructure policies S1, S2 and S3**

5C7.5.10 Policies S1, S2 and S3 will likely result in significant positive effects on liveability and place. Policy S1 offers provision for safeguarding existing community premises,

promotes the most effective use of community premises for different and changing priorities and needs, and supports change of use between D1 and D2 use classes to provide flexible stock of land and premises. Policy S2 supports proposals for new community premises, subject to criteria including the need for buildings and facilities to be designed to be flexible, adaptable and sited to maximise shared community use of premises. The policy also makes provision for residential accommodation to be used for a nursery or childcare use in exceptional circumstances subject to specified criteria. Policy S3 on schools makes provision for the shared use of schools for wider community use. School places are an important part of liveability and providing a place where people want to put down roots rather than just pass through. Provision of social infrastructure is considered crucial in producing successful social environments and improved social cohesion.

**Reasonable Alternatives (RAs)**

*No RA have been identified for policies S1 and S2 and there have been no change in strategic approach from the adopted Core Strategy with regards to these policies. The RA identified for policy S3 schools is to allow schools in KIBAs. Dependent upon the location of KIBAs to residential areas, this alternative may in some circumstances improve opportunity for more sustainable lifestyles (reduced travel) to schools for parents and school children. However, effects of industrial processes and the like from business operations (e.g. noise, vibration, odour) may adversely impact on children and their concentration levels (depending on surrounding land use).*

**Transport policies T1 – T6 and T10**

- 5C7.5.11 Appropriate transport infrastructure, particularly public transport and active travel networks given the low car ownership levels in Lambeth, are critical components in designing liveable places and communities. Sustainable patterns of development that minimise the need to travel and reduce dependence on the private car are supported in the Borough. Overall it is considered that policies T1 – T6 will likely result in significant positive effects on SA Objective 7. These policies seek to increase walking and cycling journeys and improve their infrastructure, improve public transport infrastructure including accessibility, capacity, and connectivity, promote effective use of the River Thames and manage transport impacts which all (individually and cumulatively) work towards providing more sustainable living options, and reduce the proportion of public realm where environmental factors such as car fumes make it unpleasant to be and enhance quality of public realm.
- 5C7.5.12 Policy T10 on Telecommunications ensures that the siting, height and design of equipment is minimised and does not cause unacceptable harm to the character or appearance of the area and is not visually intrusive in street scene or creates unacceptable clutter. However, in terms of clause (vi) it is considered that the word 'increased' should be removed, indeed the words 'identified increased' could perhaps both be removed unless there are good policy reasons to support their inclusion. Ultimately, noise levels arising from telecommunications should be avoided, remedied or mitigated. It is also recommended that the policy team consider including vibration as an additional impact that should be addressed in development proposals. These recommendations would ensure a more liveable physical environment for adjacent properties.

**Recommendation 85:** that the policy team review policy T10 (vi) with the view of removing at least the word 'increased' and potentially also 'identified' and including vibration so that the clause reads (for example): '*an impact assessment is submitted setting out the scheme in a visually clear way and identifying measures to overcome any noise or vibration arising as a result of the operation of the equipment or any associated with its operation.*'

**Environment and Green Infrastructure policies EN1, EN2, EN5, EN7**

- 5C7.5.13 Overall, the environment policies will likely result in positive effects on SA Objective 7. Recommendation 26 for policy EN2 on provision of food growing areas in non-residential schemes made in the health appraisal is further endorsed against SA Objective 7, to provide a more mixed-use physical and social environment that promotes social cohesion, sustainable living and sense of place.

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing. It is considered this would be a lost opportunity with regards to SA Objective 7. The RA for policy EN7 waste management is to allocate sites for waste management rather than indicate broad locations (as proposed (i.e. KIBAs)). It is considered that the alternative risks blighting an area (which may in fact never be used by a waste operator) and this could have adverse impacts on local communities if pride of place and amenities are eroded.*

*No RAs have been identified for policies EN1 and EN5.*

**Quality of the Built Environment policies Q1 – Q26**

- 5C7.5.14 Generally, all policies (Q1 – Q26) seek to provide a well designed, liveable, physical and social environment that will contribute to sense of place, and are therefore likely to result in positive effects.
- 5C7.5.15 Recommendations 36 to 38 for policy Q2 made in the appraisal against SA Objective 2 Health, and recommendation 80 made in SA Objective 6 housing are further supported with regards to SA Objective 7. In addition, the draft Local Plan should favour dual aspect residential units and a presumption against north facing units. While some site allocations specifically state this as a design consideration; no policy specifically states this for other housing developments. This could be addressed in policy Q2 or perhaps more appropriately in housing standards policy H5. It is recommended that the policy team review this.
- 5C7.5.16 As highlighted in the appraisal against SA Objective 1, it is considered that the negative design responses outlined in paragraph 10.6 for policy Q3 community safety would be better reflected in the policy. This would likely result in increased positive effects on SA Objective 7.
- 5C7.5.17 Policy Q4 addresses public art, which has potential to create significant positive effects on liveability and place. It is considered that the policy could be further improved to maximise positive benefits. Clause (a) states *inter alia* that contributions will be sought for restoration or repair of art in the locality of new development. Clause (b) states that decommissioned art work can be relocated elsewhere within the Borough. It is considered that decommissioned art work should be relocated elsewhere in the locality (of the art work), or wider locality rather than elsewhere within the Borough. Clarification is sought on the implementation of clause (c)(ii). It is unclear who requires a master-plan or design code, or whether the policy means to apply to those schemes where a master-plan or design code is provided. For the purposes of SA Objective 7, it is considered that new public art should be encouraged in all large-scale redevelopment schemes. Accordingly, it is

recommended that clause (c)(ii) is amended as follows: 'Large-scale redevelopment schemes; and'. The policy also states that an audit of public art works of 'sufficient special interest' will be prepared by the Council. It is unclear how these will be identified, but these should include all types of art from different groups, including equality groups, and should include such art as approved graffiti murals.

- 5C7.5.18 Policy Q5 should result in significant positive effects in terms of SA Objective 7. It promotes good governance as the Council will use its statutory powers to deliver environmental improvements to improve civic pride and attract investment to the Borough. As previously highlighted; it is unclear how an untidy site will be defined. Depending of the definition, management and enhancements of such sites will need to be mindful of other priorities such as biodiversity, whereby overgrown 'untidy' sites often contain valuable habitat for priority species in the Borough, for example, stag beetle or reptiles.
- 5C7.5.19 Policies Q6 to Q9 should result in positive effects for design of developments and environments. For consistency, it is considered that the word 'sustainable' is removed from the first line of policy Q7. The policy also refers to 'spaces between buildings' and 'gaps between buildings'. Clarification is sought on whether there is a difference in these terms that would affect implementation of the policy. It is considered that the word 'adjoining' in clause (viii) of policy Q7 is replaced with 'adjacent to'. As currently worded the clause will only apply to infrastructure cabinets physically affixed to/touching heritage assets, when adverse effects would also be likely to arise if such cabinets were on the street in front of a heritage asset, for example.
- 5C7.5.20 Policy Q8 is on the urban design of new development, and policy Q12 is on building alterations and extensions. Clarification is sought on the design policy applicable for major refurbishments.
- 5C7.5.21 It is recommended that policies Q8 (v) and Q12(a)(ii) are amended to insert the words 'for example' at the beginning of the plant equipment listed in the brackets. This will ensure that plant and other equipment not listed that would have an impact on the design of the development would also need to comply with the respective clause. Similarly, policy Q8(v) refers to 'important elevations' while policy Q12(a)(ii) refers to 'publically visible elevations'. It is considered that the latter term is less ambiguous and therefore policy Q8(v) should be amended.
- 5C7.5.22 It is considered that clause (iv) of policy Q8 should be reviewed by the policy team, particularly with reference to the second sentence.
- 5C7.5.23 As previously highlighted, the use of the word 'adjoining' in clause (viii) of policy Q8 may not deliver intended outcomes. Design of vehicular access, parking and servicing should be well related to the adjacent area. 'Adjoining area' may be interpreted as being applicable only within the new development site.
- 5C7.5.24 It is recommended that the word 'is' of the first line of policy Q10 is removed to clause (i). Clause (ii) refers to retaining 'existing planting and landscape features of *interest*' (emphasis added), but there is no guidance on how this might be defined. It could be argued that existing planting and landscape features are of some biodiversity interest, or interest for amenity reasons (including privacy or visual amenity). Would it be limited to priority habitats or native species? Provision or at least preference for native species is recommended. The policy appears to focus on soft landscaping (planting, trees etc) however paragraph 10.28 of supporting text states that good quality hard landscaping is encouraged. As a minimum, provision for



permeable surfaces/paving should also be included in policy Q10 with respect to hard landscaping features. Paragraph 10.28 also states that the Council considers green and brown roofs to contribute towards the successful landscape quality of schemes. While this is supported; it appears to be in conflict with policy EN4(c) which suggests that living roofs and walls may not be appropriate to the character and context of developments (it should be again noted that the sustainability appraisal does not support this policy approach unless listed buildings are adversely affected). It is considered that policy EN4(c) should be reviewed. The supporting text (paragraph 10.29) also only refers to landscape design schemes and management/maintenance programmes for residential developments including those that form part of a mixed use scheme. The policy applies to 'development', and not just residential developments, and therefore a landscape design scheme and management/maintenance programme should be provided for all landscaping proposals for all developments. It is recommended that paragraph 10.29 is accordingly amended.

- 5C7.5.25 It is considered that policies could be improved to more effectively ensure there is a net increase of vegetation and trees resulting from new developments. Policy Q7 on the public realm supports 'development that provides new...open space...landscaping / trees'; policy Q10 seeks to retain existing planting (although clause (iii) supports creation of new habitat/areas of nature conversation/biodiversity value); and policy Q11 seeks to retain trees but does not directly encourage planting of new trees in developments. It is considered that policies could be improved so that a net increase in biodiversity (habitats, trees, vegetation, flora) is achieved from development proposals to ensure policy is more aligned to sustainable development as defined in paragraph 1.2 of the draft Local Plan.
- 5C7.5.26 It is recommended that policy Q11(b)(ii) includes an 'and' at the end to ensure that all parts of the clause are demonstrated in proposals. It is expected that the Supplementary Planning Document on Trees to support implementation of Policy Q11 will provide guidance as to how trees of 'significant amenity, historic or ecological / habitat conservation value' will be identified.
- 5C7.5.27 It is recommended that the updated Supplementary Planning Document proposed for Residential Alterations and Extensions includes detailed guidance, in particular with regards to clause (h)(i) of policy Q12, as the determination of 'sufficient' side space that maintains the 'value' of the gap is quite subjective, and if interpreted or implemented inappropriately will likely result in adverse impacts, particularly on the physical and built environment. It may be worthwhile referencing policy Q15 on development in gardens in the supporting text of policy Q12 too. It is unclear whether draft Local Plan policies require alterations and extensions of buildings to avoid or mitigate adverse effects on amenities of adjoining properties, for example privacy, visual dominance, outlook, noise. Policy Q15(i) is for new buildings. Clarification is sought on whether 'new buildings' as provided for in policy Q15(c) includes extensions. Extensions should be subject to the controls outlined in policy Q15(c)(i) – (vi) to protect amenity of surrounding residents. Car parking in front gardens is allowable for disabled people which means that all dwellings built to Lifetime Homes standards will likely have car parking and this could be provided for in front gardens.
- 5C7.5.28 Policy Q13 on refuse and recycling storage should result in positive effects on SA Objective 7. However, it is considered that refuse storage areas can also impact adversely with regards to amenity and outlook (as well as noise and perhaps odour) on other uses such as school classrooms, health centre, hotels, places of worship as well as residential accommodation (as provided for in Q13(b)(iv)). As a minimum, it may be appropriate to include 'and other sensitive uses' to clause (b)(iv). This would

help improve liveability of places and spaces. It is recommended this is reviewed by the policy team.

- 5C7.5.29 Policies Q19 to Q24 seek to preserve or enhance heritage assets in the Borough. Heritage contributes to feelings of sense of place and belonging, liveability and place but also may place development restrictions on buildings which may adversely impact on owners / occupiers. However it is generally considered that buyers into such areas / buildings are likely drawn by the heritage values. It is considered that these policies will likely result in positive effects with respect to SA Objective 7.
- 5C7.5.30 Recommendation 39 for policy Q25 on providing a continuous river walkway is further supported with regards to SA Objective 7 and enhancing the quality and quantity of open space and public realm. Policies Q26 (views) and Q27 (tall buildings) should also result in positive impacts for liveability and place. It is recommended that the words 'policy compliant' are replaced with 'supported' in policy Q27(a). The definition of 'tall buildings' could be improved as it is unclear whether tall buildings adjacent to the River Thames are limited to 25 metres in height, or whether 25 metres or more is considered a tall building on sites adjacent to the River Thames. If the latter, it may be appropriate to add the words 'or more' after '25 metres'. It is also recommended that the policy team review the policy to ensure use of the word 'adjacent' is the intended implementation (i.e. to apply to sites around the River Thames rather than apply to sites abutting the River Thames). Policies Q2, Q7 and Q8 should manage any adverse effect on amenity that result from tall buildings such as overlooking, shadowing, privacy and scale and bulk relative to surrounding area. It may be appropriate to include reference to specific locations in policy Q27 though, for example 'Proposals for tall buildings (25 metres...) in specific locations will be supported where:' The supporting text then provides detail of where those specific locations are in the Borough (paragraph 10.95). However building heights of consented schemes along the River Thames (for example Hampton House at 80 metres) may make a mockery of the current policy which differentiates between the river environment and elsewhere in the Borough with lower heights considered appropriate along the Thames. Consented schemes along the river far exceed 30 metres which the policy defines as a tall building elsewhere in the Borough.

**Recommendation 86:** the draft Local Plan should favour dual aspect residential units or there should be a presumption against north facing dwellings (policy Q2 or H5).

**Recommendation 87:** Policy Q4 - it is considered that decommissioned art work should be relocated elsewhere in the locality (of the art work), or wider locality rather than elsewhere within the Borough where possible.

**Recommendation 88:** Policy Q4 - clarification is sought on the implementation of clause (c)(ii). It is recommended that clause (c)(ii) is amended as follows: 'Large-scale redevelopment schemes; and' (i.e. remove 'require a masterplan or design code')

**Recommendation 89:** Policy Q4 The policy states that an audit of public art works of 'sufficient special interest' will be prepared by the Council. It is unclear how these will be identified, but these should include all types of art from different groups, including equality groups, and should include such art as graffiti.

**Recommendation 90:** For consistency, it is considered that the word 'sustainable' is removed from the first line of policy Q7. Clarification is also sought on whether there is a difference in the terms 'gaps' and 'spaces' (between buildings) that would affect implementation of the policy.

**Recommendation 91:** That the word 'adjoining' in clause (viii) of policy Q7 is replaced with 'adjacent to'.

**Recommendation 92:** Policy Q8 is on the urban design of new development, and policy Q12 is on building alterations and extensions. Clarification is sought on the design policy applicable for major refurbishments.

**Recommendation 93:** That policies Q8 (v) and Q12(a)(ii) are amended to insert the words 'for example' at the beginning of the plant equipment listed in the brackets. Also, policy Q8(v) refers to 'important elevations' while policy Q12(a)(ii) refers to 'publically visible elevations'. It is considered that the latter term is less ambiguous and therefore policy Q8(v) should be amended for consistency.

**Recommendation 94:** That clause (iv) of policy Q8 should be reviewed by the policy team, particularly with reference to the second sentence.

**Recommendation 95:** That the word 'is' of the first line of policy Q10 is removed to clause (i).

**Recommendation 96:** Clause (ii) policy Q10 refers to retaining 'existing planting and landscape features *of interest*' (emphasis added), but there is no guidance on how this might be defined. It is recommended this is reviewed by the policy team.

**Recommendation 97:** provision for permeable surfaces/paving should also be included in policy Q10 with respect to hard landscaping features.

**Recommendation 98:** that paragraph 10.29 is amended so that a landscape design scheme and management/maintenance programme is provided for all landscaping proposals for all developments.

**Recommendation 99:** It is considered that policies of the draft Local Plan could be improved to more effectively ensure there is a net increase of vegetation and trees resulting from new developments. There appears to be more of an emphasis on retention rather than new provision (policies Q7, Q10, Q11).

**Recommendation 100:** That policy Q11(b)(ii) includes an 'and' at the end to ensure that all parts of the clause are demonstrated in proposals.

**Recommendation 101:** That the updated Supplementary Planning Document proposed for Residential Alterations and Extensions includes detailed guidance, in particular with regards to clause (h)(i) of policy Q12.

**Recommendation 102:** Clarification is sought on whether 'new buildings' as provided for in policy Q15(c) includes extensions. Extensions should be subject to the controls outlined in policy Q15(c)(i) – (vi) to protect amenity of surrounding residents.

**Recommendation 103:** Refuse storage areas can also impact adversely with regards to amenity and outlook (as well as noise and perhaps odour) on other uses such as school classrooms, health centre, hotels, places of worship as well as residential accommodation (as provided for in Q13(b)(iv)). It may be appropriate to include 'and other sensitive uses' to clause (b)(iv).

**Recommendation 104:** That the words 'policy compliant' are replaced with 'supported' in policy Q27(a).

**Recommendation 105:** The definition of 'tall buildings' could be improved as it is unclear whether tall buildings adjacent to the River Thames are limited to 25 metres in height, or whether 25 metres or more is considered a tall building on sites adjacent to the River Thames. It is also recommended that the policy team review the policy to ensure use of the word 'adjacent' is the intended implementation (i.e. to apply to sites around the River Thames rather than apply to sites abutting the River Thames).

**Recommendation 106:** It may be appropriate to include reference to specific locations in policy Q27, for example 'Proposals for tall buildings (25 metres...) in specific locations will be supported where...'

### ***Places and Neighbourhoods policies PN1 – PN9***

5C7.5.31 Policy PN1 on Waterloo will likely result in significant positive effects on liveability and place. It promotes social interactions between different sectors of community, and community engagement through its role for culture and arts, as well as tourist, leisure and entertainment facilities. Mixed uses developments, including affordable housing, coupled with measures such as safeguarding Lower Marsh/The Cut for its local needs services and specialist retailing are encouraged which further promotes social environments conducive to supporting social cohesion and sense of place. The area has good transport links, and the policy supports improvements to transport capacity and accessibility, as well as improved healthcare facilities, all of which support long-term sustainable living. Part of Hungerford Carpark is proposed to be redeveloped into open space as an extension to the Jubilee gardens. This will deliver enhanced quality and quantity of open space provision in this area of the Borough. The remainder of the carpark is to be used for arts and cultural uses. The loss of the car park is considered very positive for the area in terms of liveability and place, as

well as other sustainability benefits such as improved air quality, and visual effects.

- 5C7.5.32 Policy PN2 on Vauxhall will also likely result in a mix of significant positive effects and uncertain or even negative effects (particularly regarding tall buildings and dependent on the degree adverse effects are mitigated) in terms of SA Objective 7. A new district centre will be created that will include mixed use development for the range of town centre uses. The policy also seeks to respect local distinctiveness of existing neighbourhood destinations, and consolidate and expand cultural and evening economy uses between places of interest. Public realm improvements are proposed, particularly in terms of public transport infrastructure, walking and cycling, as well as removal of the gyratory which should result in significant positive impacts on the physical environment of the area. The policy states that heights of up to 150m will be acceptable in and around Vauxhall Cross and along the Embankment up to 80 metres. The policy then states 'development of this scale will be supported subject to...'. It is unclear whether this statement applies to just the Embankment developments or both the Embankment and Vauxhall Cross development. It is recommended that this is clarified by the policy team with the view of amending to, for example, 'Developments of these scales...'. It is noted that the heights of 150m and 80 are derived from key principles outlined in the Vauxhall Opportunity Area Framework and some schemes of these heights have already been consented. There are amenity concerns with heights of this scale, including overshadowing, restricted views of the Thames and wind tunnel effects, as well as visual effects that could be perceived by some as 'skyscrapers'. However, effective implementation of policies Q27 and amenity and urban design policies Q2, Q7 and Q8 should seek to manage or mitigate such adverse impacts on the environment. Although, there is considered to be a discrepancy between policy Q27 and PN2, whereby tall buildings in policy Q27 are defined as being 25 metres high near the River Thames, yet policy PN2 allows for heights of up to 150 metres in Vauxhall Cross, which is much higher than that defined as a tall building (six times) in policy Q27. There seems to be some conflict between the policies as a building is considered tall at 25 metres by the river, but 30 metres elsewhere and yet policy PN2 effectively promotes much taller buildings in Vauxhall Cross and Embankment (which are adjacent to the River Thames). The integrity of policy Q27 as currently worded may be questionable (particularly regarding definition of tall building). Adverse effects on surrounding communities resulting from tall buildings will need to be mitigated. Delivery of necessary infrastructure prior to occupation will be an important determinant of achieving a district centre that is liveable, promotes social cohesion and sense of place, and delivery of such infrastructure (for example schools and health provision) is currently uncertain.
- 5C7.5.33 Policy PN3 for Brixton should result in significant positive effects for SA Objective 7. It seeks to safeguard and promote the multicultural and diverse town centre through sensitive regeneration. Local heritage and historic built environment and different character areas will be respected, public spaces improved and mixed used developments including residential, employment, cultural industries, leisure and entertainment, as well as new school places. The reference to policy S9 in PN3(a) needs to be changed to Policy Q27.
- 5C7.5.34 Policy PN4 for Streatham will also likely result significant positive effects through improved accessibility and use of public transport, walking and cycling with measures to reduce impact and dominance of road traffic. Improved vitality, viability and local distinctiveness of the four distinct hubs of Streatham will be supported. Landmark buildings providing destinations for people of the wider catchment, enhancement of community facilities, mixed use developments including housing, and new markets in Streatham Central and Streatham Village will likely promote community engagement

and result in people feeling positive about where they live.

- 5C7.5.35 Policy PN5 for Clapham seeks to provide a district centre that reinforces its distinct character and historic environment and encourage provision for cultural, creative, visual and performing arts, street markets and other forms of community innovation while managing food and drink uses and impact of night-time economy (compliance with policy ED8). The policy will likely result in improved liveability and feelings of sense of place.
- 5C7.5.36 Improvements to housing estates and connections between housing estates as well as improved traffic and environmental conditions for pedestrians (and cyclists – see recommendation 14) will likely result in enhanced sense of place and improved community cohesion for Stockwell, as provided for in policy PN6.
- 5C7.5.37 Policy PN7 for Oval seeks to improve the relationship of the stadium with the adjoining area, particularly improved linkages and public realm. The policy also seeks to improve the quality and extent of shopping and other town centre uses, including reuse of the Oval House Theatre, housing and employment. It is considered that the policy should result in significant positive effects on the current baseline of the environment.
- 5C7.5.38 It is considered that liveable, mixed use physical and social environments should result in the West Norwood/Tulse Hill district centre as a result of policy PN8. Shopping floor-space, education and other community facilities including healthcare, commercial uses and housing are proposed for the centre. Regeneration and improvement of existing housing estates will be supported, as will development to meet education need in the area. Overall it is considered that positive effects should result from policy PN8.
- 5C7.5.39 Policy PN9 for Herne Hill also seeks to enhance the quality of the public realm, particularly between the station and adjoining areas. The historic character will be protected and enhanced, also contributing to a sense of place.
- 5C7.5.40 Loughborough Junction policy PN10 has been co-produced with the LJAG and seeks a clear identity and sense of place for the local centre. Public realm improvements and well designed schemes will be supported to engender a sense of place in Loughborough Junction. Improved access, better use of underused spaces and places and improved public safety measures are proposed. The policy seeks to provide all necessary services and access to employment within close walking distance of every home which demonstrates a desire to achieve sustainable lifestyles and improved social cohesion for the area. The seven bridges project will significantly improve the railway bridges which are a key feature of the area resulting in a real sense of identity and pride for the area.

**Recommendation 107:** Policy PN2 states ‘development of this scale will be supported subject to...’. It is unclear whether this statement applies to just the Embankment developments or both the Embankment and Vauxhall Cross development. It is recommended that this is clarified by the policy team with the view of amending to, for example, ‘Developments of these scales...’.

**Recommendation 108:** There seems to be some conflict between policies Q27 and PN2 as a building is considered tall at 25 metres by the river, but 30 metres elsewhere and yet policy PN2 effectively promotes much taller buildings in Vauxhall Cross and Embankment (which are adjacent to the River Thames). It is recommended this is reviewed by the policy team.

**Recommendation 109:** The reference to policy S9 in PN3(a) should read Policy Q27.

## 5C7.6 Assessment of Sites

### Likely significant effects of implementing Site Allocations, taking into account mitigation

5C7.6.1 All sites in Table 30 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 7.

**Table 29: Significance criteria for SA Objective 7: Liveability and Place**

Positive	Negative
<ul style="list-style-type: none"> <li>• Allocation contributes positively to open space provision and the quality of the public realm</li> <li>• Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion</li> <li>• Allocation provides additional shops and services in town and other centres</li> <li>• Housing or mixed use site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>*Site is protected open space, including MOL or Green Belt</b></li> <li>• Site would reduce open space provision or impact adversely on the public realm.</li> <li>• Allocation likely to increase private car use (and worsen modal shift).</li> <li>• Out of ‘centre’ site likely to compete with shops and services in town and other centres</li> </ul>

\* Indicates high level constraint

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**TABLE 30: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 7: LIVEABILITY AND PLACE**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- Housing site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- allocation provides healthcare facilities as preferred use</li> <li>- allocation contributes positively to quality of public realm, respected conservation area and registered park</li> </ul>		
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	<ul style="list-style-type: none"> <li>- education use is the preferred use which promotes improved social cohesion locally (local children can attend local school – helps people ‘put down roots’)</li> <li>- allocation ensures due consideration of neighbouring residents in terms of amenity such as noise, privacy</li> </ul>	<ul style="list-style-type: none"> <li>- potential for increased vehicle movements associated with school drop-off / pick up which may impact adversely on public realm</li> </ul>	<ul style="list-style-type: none"> <li>- site has good public transport accessibility, particularly from Acre Lane</li> <li>- compliance with other draft Local Plan policies, particularly transport policies</li> </ul>
3	Vale Street Depot, Vale Street SE27	<ul style="list-style-type: none"> <li>- preferred use is education or housing (see above if used for education)</li> <li>- allocation ensures due consideration of neighbouring residents in terms of amenity such as noise, privacy</li> <li>- allocation respects adjoining conservation area</li> </ul>	<ul style="list-style-type: none"> <li>- if used for education: potential for increased vehicle movements associated with school drop-off / pick up which may impact adversely on public realm</li> <li>- potential for increased private vehicle use given public transport accessibility is classified as very poor and site proposed to retain reuse and recycling centre</li> </ul>	<ul style="list-style-type: none"> <li>- compliance with other draft Local Plan policies, particularly transport policies</li> </ul>
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion</li> <li>- Allocation provides additional shops and services</li> <li>- Housing or mixed use site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> </ul>		
5	Shell Centre, 2-8 York Road SE1	<ul style="list-style-type: none"> <li>- Mixed use development, including community, cultural, sport facilities that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion</li> </ul>		



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		<ul style="list-style-type: none"> <li>- Allocation provides additional shops and services</li> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> </ul>		
6	Waterloo Station, Waterloo Road SE1	<ul style="list-style-type: none"> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> <li>- preferred use is railway terminal and transport interchange with retail and office uses</li> <li>- Allocation provides additional shops and services</li> <li>- mixed use site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> </ul>		
7	Cornwall Road Bus Garage, Cornwall Road SE1	<ul style="list-style-type: none"> <li>- Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion</li> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> </ul>		
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	<ul style="list-style-type: none"> <li>- preferred use mix of uses including residential, employment and retention of operation fire station</li> <li>- mixed and balanced community with acceptable mix is a key development consideration for the site</li> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- Allocation contributes positively to open space provision (new internal publically accessible square) and the quality of the public realm</li> </ul>	- noise and disturbance issues may arise with the retention of an operational fire station along with residential	- Compliance with other Local Plan policies (in particular those addressing amenity)
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	<ul style="list-style-type: none"> <li>- Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion</li> <li>- Allocation provides additional shops and services</li> <li>- provision for new primary school also contributes to social cohesion</li> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> </ul>	- noise, pollution and vibration associated with railway viaduct may impact on liveability unless appropriately designed and mitigated against	- Compliance with other Local Plan policies (in particular those addressing amenity)
10	Land bounded by Wandsworth Road to the west, Parry Street to the north,	<ul style="list-style-type: none"> <li>- Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion (public art provision included in allocation)</li> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle</li> </ul>	- noise, pollution and vibration associated with railway viaduct may impact on liveability unless appropriately designed and mitigated against	- Compliance with other Local Plan policies (in particular those addressing

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	Bondway and the railway viaduct to the east SW8	<p>modes to town or other centre</p> <ul style="list-style-type: none"> <li>- Allocation provides additional shops and services</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> </ul>		amenity
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	<ul style="list-style-type: none"> <li>- Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion</li> <li>- Allocation provides additional shops and services</li> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> </ul>		
12	Somerleyton Road SW9	<ul style="list-style-type: none"> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- mixed use development site, promoting social cohesion and interaction</li> <li>- allocation provides additional services</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> </ul>		
13	Popes Road SW9	<ul style="list-style-type: none"> <li>- mixed use development including retail, commercial, community, leisure, residential and town centre car and cycling parking</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> <li>- allocation re-provides adequate market facilities which contributes to social cohesion and interaction</li> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> <li>- allocation provides additional shops and services</li> </ul>	- provision of car parking promotes private vehicles use	- compliance with other draft Local Plan policies, particularly transport
14	Brixton Central (between the viaducts) SW9	<ul style="list-style-type: none"> <li>- mixed use retail, workspace, food and drink, community leisure and recreation uses, as well as creative and cultural industries hub and market support centre and facilities will likely result in social interaction and cohesion</li> <li>- allocation provides additional shops and services</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm (including improvement to Brixton Station)</li> </ul>		
15	SW2 Enterprise Centre	<ul style="list-style-type: none"> <li>- redevelopment to provide community facilities, retail, residential and employment floorspace as well as civic uses will result in social cohesion, interaction and improved liveability</li> <li>- allocation provides additional shops and services</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> <li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li> </ul>		

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16	260 – 367 Norwood Road SE27	<ul style="list-style-type: none"><li>- mixed use development including supermarket, housing, community uses will result in social interactions and cohesion</li><li>- allocation provides additional shops and services</li><li>- Allocation contributes positively to open space provision and the quality of the public realm</li><li>- site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre</li></ul>		
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**5C7.7 Summary of Local Plan policies and site allocations**

5C7.7.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan policies and site allocations will have a positive effect on recognising the existing baseline and in promoting social cohesion, sustainable lifestyles and sense of place.

**Table 31: Summary of assessment of effects of draft Local Plan on liveability and place**

Assessment of effects of the Local Plan on SA objective 7	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
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>Generally, it is considered that the Draft Local Plan contains good provisions that work well together to encourage a sense of place, community identity and belonging. Not one policy will solely achieve this; but each contributes an aspect that will result in significant cumulative positive effects in creating a Borough where communities feel they belong, where they identify with and wish to put down roots and where they feel a sense of place.</p> <p>Mixed-use developments, including housing are proposed for Opportunity Areas, major centres and most site allocations where public transport accessibility is generally good. These areas will likely result in increased densities and population. Necessary infrastructure to support this growth will need to be in place before occupation of developments in order to effectively achieve SA Objective 7 in a timely manner. There is uncertainty whether such infrastructure will be delivered in time (see Infrastructure Schedule Annex 2 of Local Plan), particularly in relation to Vauxhall. The Plan seeks to ensure services and facilities are accessible and there continues to be opportunities for local employment.</p> <p>Public realm improvements are proposed for all town centres including new open space provision where possible and improved connectivity and accessibility by active travel and public transport is promoted through transport policies.</p>	<p>It is considered that as areas of the Borough are regenerated, and buildings are redeveloped it is likely that actions will be taken to help improve the sense of place and community identity and belonging. Therefore small scale achievements (e.g. redevelopment of a town centre park or square) and small scale new housing developments may be made in the short term. Commencement of development of Vauxhall Opportunity Area is likely in the short term and will continue during the whole plan period.</p> <p>In the medium to long term, it is likely that house building rates will increase (particularly outside of Opportunity Areas) and town centres will be redeveloped in a manner that results in increased sense of place, identity and belonging. Similarly, as population grows due to new housing building, community facilities will need to be provided to reflect demand.</p> <p>Major transport developments are unlikely to be evident until the medium to long-term.</p>	Permanent and ongoing in terms of recognising and providing for specific needs of the community as population increases.

**5C7.8 Recommendations for monitoring likely significant and uncertain effects**

5C7.8.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- 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

## **5C8. BUILT AND HISTORIC ENVIRONMENT**

5C8.0.1 This section of the SA relates to the sustainability performance of the Local Plan against:

SA Objective 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.

5C8.0.2 To achieve objective 8 plan policies need to protect sites, features and areas of historical, archaeological and cultural value/potential; enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals); aspire to a range of buildings and architecture that reflect the cultural diversity of the borough; conserve and enhance the townscape/cityscape character, including historical, archaeological and cultural value/potential and its contribution to local distinctiveness; increase access to, enjoyment of and understanding of, historical, archaeological and cultural sites, features and areas; protect, enhance or create open space; and protect valued views.

### **5C8.1 Relevant Policy Objectives**

#### National Level

5C8.1.1 Paragraphs 126 – 141 of the National Planning Policy Framework 2012 relate to Conserving and Enhancing the Historic Environment. It states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In terms of design, paragraphs 56 – 68 provides guidance. The Government attaches great importance to the design of the built environment.

5C8.1.2 *English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)*

The aim of this document is to set out a logical approach to making decisions and offering guidance about all aspects of the historic environment, and for reconciling its protection with the economic and social needs and aspirations of the people who live in it. The document contains conservation principles, policies and guidance that make a contribution to addressing the challenges of modernising heritage protection by proposing an integrated approach to making decisions, based on a common process.

#### Regional Level

5C8.1.3 Chapter 7 of the *London Plan 2011*, London's Living Places and Spaces, contains a raft of design, character and architecture related policies. For example, architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Areas that are appropriate, sensitive or inappropriate for tall and large buildings should be identified in Local Development Frameworks and meet criteria outlined in the London Plan.

### **5C8.2 Baseline conditions and existing issues**

5C8.2.1 Lambeth has approximately 2,500 listed buildings. The vast majority of these are nineteenth century residential dwellings reflecting the historical development of the borough. Typically two or three structures are added to the statutory list each year. A local list of historically significant buildings (not on the national list) is being prepared.

5C8.2.2 There are 62 conservation areas in Lambeth covering approximately 30 per cent of the borough. Eighteen conservation areas have up-to-date character appraisals. The first area was designated in 1969 and the most recent in 2009. These are also mostly residential in character, with the notable exceptions of the South Bank, characterised by post-war cultural and civic buildings, and West Norwood with its nineteenth century cemetery and

many fine monuments. The borough also has seventeen Archaeological Priority Zones and eight historic Registered Parks and Gardens (of which two are private), and has protected strategic views in the north of the borough of St Paul's Cathedral and the Palace of Westminster (a World Heritage site).

5C8.2.3 In 2012 there were 40 buildings on the 'Heritage at Risk Register' – a net increase on the previous year, but this may be attributable to a more thorough inspection of many of the tombs and monuments in the borough and therefore a better understanding of the condition of these.

### 5C8.3 Likely future evolution without the Plan

5C8.3.1 The council will need to continue to work to reduce the number of buildings and structures on the 'at Risk' register. Without the new Local Plan, the NPPF deems current saved UDP and Core Strategy policies to be out-of-date. Applicable planning policies would be those contained within the London Plan and NPPF, both of which would not provide for the local character and context of Lambeth.

### 5C8.4 Assessment of Policies

#### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

D1 – Delivery and monitoring	Q10 – Landscaping
D2 – Presumption in favour of sustainable development	Q11 - Trees
D3 – Infrastructure	Q12 – Building alternations and extensions
D4 – Planning obligations	Q13 – Refuse / recycling storage
ED2 – Business uses outside KIBAs	Q15 – Development in gardens
ED6 – Town centres	Q16 – Boundary treatments
ED7 – Changes of use within town centres	Q17– Shop fronts and signage
ED8 – Night time economy and food and drink uses	Q18 – Advertisement panels and hoardings
ED12 – Visitor attractions, leisure, arts and culture	Q19 – Historic environment strategy
ED14 – Markets	Q20 – Westminster world heritage site
T2 – Walking	Q21 – Statutory listed buildings
T3 - Cycling	Q22 – Registered parks and gardens
T5 – River transport	Q23 – Conservation Areas
T10 – Telecommunications	Q24 – Undesignated heritage assets
EN1 – Open space	Q25 – River Thames
EN2 – Local food growing and production	Q26 - Views
Q2 – Amenity	Q27 – Tall buildings
Q3 – Community safety / crime	PN1 – Waterloo
Q4 – Public art	PN2 – Vauxhall
Q5 – Environmental enhancement strategies	PN3 – Brixton
Q6 – Local distinctiveness	PN4 – Streatham
Q7 – Urban design / public realm	PN5 – Clapham
Q8 – Urban design / new development	PN9 - Herne Hill
Q9 – Design quality / construction detailing	PN10 Loughborough Junction

#### ***Delivery and Monitoring policies D1 – D4***

5C8.4.1 Overall it is considered that policies, in particular policies D1, D3 and D4, will result in significant positive effects on SA Objective 8. This is because the policies seek to ensure partners are involved in delivering sustainable development, that local distinctiveness is enhanced, infrastructure is in place to support growth and planning obligations are used for local improvements for example infrastructure, public realm improvements, and highways and traffic works. However achievement of SA Objective 8 and significant positive effects is dependent on delivery of necessary infrastructure, particularly the northern line extension to Nine Elms (where funding is yet to be confirmed), increased school places and health provision, particularly in new district centre of Vauxhall.

***Economic development and town centre policies ED2, ED6, ED7, ED12, ED14***

5C8.4.2 It is considered that the economic development and town centre policies will result in significant positive effects on SA Objective 8, in particular on conserving and enhancing the townscape/cityscape character and its contribution to local distinctiveness. Policy ED2 allows the loss of employment generating floorspace in very limiting circumstances, one of which is the restoration to its original use of a listed building or a building of significant architectural merit. Development in town centres will need to avoid blank walls and facades, provide shop windows, be designed to add to the physical attractiveness of the area and provide for active frontages at ground floor level, all of which conserve and enhance townscape / cityscape character. Major redevelopment proposals will also need to re-provide independent individual shop premises on affordable terms, which will contribute to maintaining cultural value and its contribution to local distinctiveness of townscapes in the retail offer they provide. Use of pavements for food and drink uses can positively contribute to townscape / cityscape character and policy ED8 ensures the width of the footway is adequate for this use without obstructing pedestrian flow or result in hazard for users.

5C8.4.3 Policy ED12 should result in significant positive effects on SA Objective 8. It does not support loss of visitor attractions, leisure, arts and culture uses. The South Bank Strategic Cultural Area is safeguarded for the retention of arts and cultural facilities and the character of the area as an arts and cultural quarter is protected. The policy lends itself to support possibilities for cultural events / activities. The policy enhances townscape/cityscape character, particularly for its cultural value. The markets policy (ED14) also contributes to enhancing cultural diversity and value in the Borough, however, it is considered that the policy does not overtly protect existing markets. Clause (b) only protects existing markets from retail developments that would threaten market viability and continuation. The clause does not specifically protect existing markets in general or from other proposals for the land, including change of use. It is considered that existing markets in the Borough contribute valuably to townscape/cityscape characters, cultural diversity, cultural value and social cohesion. Markets may also have a (undesigned) historical value to people. Policy ED6 protects market areas but only within town centres. It is recommended that policy ED14 is reviewed to make provision for the protection of existing markets regardless of their location.

**Recommendation 110:** That policy ED14 is reviewed to make provision for the protection of existing markets

**Reasonable Alternatives (RAs)**

*The RA for policy ED2 Business uses outside of KIBAs is to allow loss of employment generating uses; not have the exception of loss for D1 uses; and increasing the length of time a site must be marketed for B1 use before allowing residential use. In terms of SA Objective 2, it is considered that any effects on SA Objective 8 on not controlling loss of employment generating uses would likely be de minimus.*

*The RA for policy ED6 Town Centres is to not require re-provision on affordable terms for independent shop premises as part of major redevelopments. It is considered that this alternative could adversely impact on the character of town centres (but new development would also be subject to design policies). Therefore, effects may be negligible. The analysis of centres in the Lambeth Retail Study demonstrates the important role independent traders play in providing diversity and maintain the health and vitality of centres.*

*The RA for policy ED7 is other variations of percentages for ground floor retail units in primary shopping areas. A change in the amount of retail provision will change the character of the built environment, although any effects are considered uncertain without more detailed evidence base supporting any percentage change.*

*The RA identified for policy ED8 – Night time economy and food and drink uses would be to apply clause (c) to any major or district centre rather than just Waterloo and Vauxhall Opportunity Areas. This would mean there would be less control on the number of food and drink uses in major and district centres in the Borough. A further RA identified is to allow different percentage thresholds in different parts of the Borough. However this was dismissed as being too difficult/complex and had no supporting evidence base. Another alternative is to allow a higher percentage of food and drink uses on ground floor units in primary shopping areas (i.e. increased from 25% frontages). Any increase in food and drink uses would likely alter the built environment, particularly through use of pavements and public realm (e.g. cafés and pubs). Secondary effects associated with littering and the way people use public spaces adjacent to food and drink establishments (for example smokers) would also impact on the character of the built environment.*

*No RAs identified for policies ED12 and ED14.*

**Transport policies T2, T3, T5, T7, T10**

5C8.4.4 Policies T2 on Walking and T3 of Cycling seek to provide physical environments (i.e. walking and cycling routes) conducive for active travel and therefore contribute to the sustainability and quality of the built environment. Existing and new piers support use of the River Thames for transport which contributes to a sustainable built environment; however care must be taken to ensure the number of new piers does not result in adverse visual effects on the river setting itself. Clause (c) of policy T5 states that new piers will be supported where there is no unacceptable harm to river navigation; the effectiveness of flood defences; the hydrology, environment or biodiversity of the river; or the setting of land-based heritage assets. It is considered that new piers would form part of the built environment and the cumulative impact of new piers may result in adverse visual effects on the river setting if left unmanaged. While this may be addressed within '...must be in keeping and appropriate to their context'; it is considered that unacceptable impacts on the river setting itself could be more clearly provided for. It is therefore recommended that a further bullet is added to clause (c): 'the visual amenity of the river itself'.

5C8.4.5 Policy T7 on parking seeks to restrict car parking in developments, and promotes car free and low car developments which will help to improve attractiveness, character and sustainability of the built environment. While not stated in policy T7; policy Q8 on design of new developments states that vehicular access and parking need be visually attractive. Policy T10 should ensure telecommunications does not cause unacceptable harm to the character and appearance of an area or building.

**Recommendation 111:** That a new bullet point is added to policy T5(c) ensuring that the visual amenity of the river itself is protected from new pier proposals, for example: 'the visual amenity of the river itself'.



**Environment policies EN1, EN2, EN4**

- 5C8.4.6 Policies EN1 and EN2 should result in significant positive effects on SA Objective 8, particularly if recommendations 26 and 58 are incorporated as policy EN1 seeks to protect open spaces and increase provision, and policy EN2 provides for food growing spaces. However, paragraph 9.12 of supporting text states that green roofs can accommodate greenhouses. This would likely result in visual effects but should be managed through policy Q12. Policy EN4 is on sustainable design and construction. Recommendations 28 to 33 (addressing CEEQUAL, higher Code for Sustainable Homes and BREEAM standards and living roofs), are further endorsed with respect to SA Objective 8 in providing a more sustainable built environment. Improved local air quality and reductions in CO<sub>2</sub> emissions will likely have a positive impact on the existing historic environment and townscape of the Borough.

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing. It is considered this would be a lost opportunity with regards to sustainability and open space of the built environment.*

**Quality of Built Environment policies Q2 – Q27**

- 5C8.4.7 Overall, it is considered that the above policies should result in positive effects on the built and historic environment, however as currently worded, some policies may result in negative effects on SA Objective 8 and recommendations are made below to redress this. Importantly, all recommendations and comments previously made on policies Q2 – Q11 will result in more positive outcomes with regards to SA Objective 8 and therefore are further endorsed. Policies emphasise the need for well designed buildings with use of quality materials where local distinctiveness is sustained and reinforced. This will include both local character and reflecting the cultural diversity of the Borough through appropriate architecture.
- 5C8.4.8 Policy Q12 sets out guidance for building alterations and extensions. Overall, the policy seeks to deliver good design and be respectful to the host building. Clause (h)(i) on side extensions states that sufficient side space above ground floor level should be retained to maintain gaps between buildings and prevent visual terracing. Further 'retained side space should be sufficient to maintain the value of the gap and a minimum of 1 metre'. The use of the word 'and' makes it unclear whether a 1 metre gap between buildings maintains the value of the gap, or whether the value of the gap needs to be determined, and then an additional 1 metre minimum should be provided. Moreover, such a gap need only be above ground floor level, so side access to the rear of the building is not required which will prevent maintenance to the side of the building, and maintenance at the rear through limited access. It is recommended that this policy is revisited by the policy team to verify whether side access should be required, and clarify the minimum distance for the gap between buildings for example rewording to: '...sufficient to maintain the value of the gap and be a minimum of 1 metre'. Misinterpretation of the policy could result in adverse visual effects. The SPD for Buildings Alterations and Extensions should provide further guidance on this.
- 5C8.4.9 Refuse/recycling storage and cycle storage (policies Q13 and Q14) areas are expected to be fully integrated into the design of development from the outset, helping to achieve a quality built environment that is sustainable and recommendations 11 and 103 to these policies will further improve the extent of resulting positive effects.
- 5C8.4.10 Policy Q15 addresses development in gardens. It is clear that development in front gardens and prominent corner/side gardens is not supported, unless it is for disabled parking, for which a series of criteria minimising impacts would need to be met. Many dwellings built to Lifetime Homes standard may therefore result in car parking in front gardens unless it is provided off-site, basement level or another location. Clause (a) of the

policy states that gardens are not development sites. Clause (c) states that development in rear gardens and on undeveloped back-land sites has potential to erode amenity and habitat value (gardens are an identified priority habitat and are defined as open space), and that for these reasons *new buildings* will only be supported if specific criteria is met. It is clear that clause (c) applies to new buildings. Policy Q12 on extensions states that rear extensions should be single storey, and no further controls are imposed. It is considered that rear extensions can result in the same adverse effects on amenity and habitat value as new buildings. Therefore, it is considered that the measures to mitigate such adverse effects outlined in policy Q15(c)(i) – (vi) should also apply to extensions. An extension or addition to a dwelling is considered to be permitted development not requiring an application for planning permissions if specific limits and conditions are met. Accordingly it is recommended that policy Q15 (c) second sentence is amended as follows: ‘For these reasons new buildings and extensions and alterations requiring planning permissions will only be supported where:’. Furthermore, it is noted that policy Q15(c)(iv) provides for a setback of at least 1 metre to allow access for maintenance and gaps between buildings. Gaps of such size (i.e. 1 metre) can result in adverse visual effects if used for storage of materials. It is recommended that these policies are reviewed by the policy team, particularly ensuring the policies are compatible and consistent in approach (e.g. policies Q12(h)(i) and Q15(c)(iv)).

5C8.4.11 Policies Q16 to Q18 should result in positive effects on the built environment. Policies Q19 to Q24 should result in significant positive effects on the historic environment, including archaeology and green spaces of heritage value. Views in and out are protected in these policies, as well as through policy Q26 which protects strategic views including panoramas, landmark silhouettes and roofscape views. The recently completed Shard is a landmark which the Council may wish to consider protecting views to. Policy Q26 acknowledges the important role roofscape plays in a viewer’s appreciation of the wider cityscape. Green roofs should be supported to enhance these views of roofscapes. Recommendations 58 and 35 made in relation to policies EN2 and EN4 are further endorsed.

5C8.4.12 Policies Q25 (River Thames) and Q27 (Tall Buildings) should also result in positive effects on SA Objective 8. The supporting text of policy Q27 identifies potential locations where tall buildings are acceptable. Recommendations 105 and 106 are further endorsed with regards to SA Objective 8 to improve clarity of the policies.

**Recommendation 112:** That policy Q12(h)(i) is revisited by the policy team to verify whether side access should be required, and clarify the minimum distance for the gap between buildings. The use of the word ‘and’ makes it unclear whether a 1 metre gap between buildings maintains the value of the gap, or whether the value of the gap needs to be determined, and then an additional 1 metre minimum should be provided.

**Recommendation 113:** That policies Q15(c) and Q12(f) and (h) are reviewed by the policy team in light of the observations above, particularly ensuring the policies are compatible and consistent in approach.

**Recommendation 114:** That the second sentence of policy Q15(c) is amended to: ‘For these reasons new buildings and extensions and alterations requiring planning permissions will only be supported where:’

**Recommendation 115:** That the Council consider whether protection of views to the Shard is appropriate (policy Q26).

**Places and Neighbourhoods policies PN1 – PN10**

- 5C8.4.13 Policy PN1 on Waterloo will result in significant positive effects on the built and historic environment. The policy protects features and areas of historic and cultural value and their settings. The provision of cultural facilities and cultural events will be enhanced, particularly in the South Bank area, and the policy seeks to improve access and enjoyment of these areas as well. Locations for tall building are identified and it is clear there will need to be due regard to strategic views.
- 5C8.4.14 It is considered that policy PN2 for Vauxhall will also result in significant positive effects on SA Objective 8 provided previous recommendations regarding tall buildings are addressed. Guidance on building heights acceptable for the Northern Gateway, Miles Street and Pascal Place would be helpful. Similarly, it is recommended consistent terminology is used in reference to Vauxhall between the London Plan and the Local Plan, to avoid ambiguity. The London Plan identifies Vauxhall as a having potential as a future Central Activity Zone (CAZ) area. Policy PN2 seeks to create a new district centre, which falls within the same type of town centre as Stockwell, Oval and West Norwood/Tulse Hill. Vauxhall's classification in the London Plan suggests that extension of the CAZ is desired at a regional level. The Local Plan should be in conformity with the London Plan.
- 5C8.4.15 The policy effectively enhances local character and distinctiveness through proposed use of railway arches as an active spine, seeks to expand and consolidate cultural and evening economy and make improvements to open space provision. Design of the transport experiences will be improved, with removal of the gyratory and remodelling of the bus station which will result in significant improvements to the built environment as well as liveability and place. Proximity to the River Thames is maximised and respected in the policy to ensure improved use and design of the built and physical environment. Strategic views and local contextual consideration including heritage assets will be protected through high quality design. Given a new district centre will be created, it may be worth emphasising that buildings and architecture that reflect the cultural diversity, including equalities groups will be supported (reinforcing policy Q6). This will also help improve outcomes in relation to SA Objective 5 on equalities. It is recommended this is reviewed by the policy team.
- 5C8.4.16 Policy PN3 for Brixton should result in significant positive effects for the built and historic environment. A number of public realm improvements are proposed (including provision for public art), and sensitive regeneration that recognises local heritage and the distinctive multicultural, diverse town centre and its specific character areas will be supported. Clause (i) supports preserving and enhancing all historic *frontages* along Brixton Road (emphasis added). This area is within a Conservation Area and thus there appears to be a conflict with this statement and policy Q23 which states that façade retention with the demolition of the remaining building is not considered appropriate in conservation areas. It is recommended this potential anomaly is reviewed by the policy team. New spaces for creative and cultural industries are included in the policy, as are areas for theatre and arts facilities. However, the policy does not specifically identify locations where tall buildings within Brixton town centre would be acceptable, despite clauses (e) to (l) providing detail of the kind of development desired in the eight distinct areas. The forthcoming SPD may provide some guidance on this, but it may be appropriate for the policy team to review this policy in terms of preferred locations for tall buildings.
- 5C8.4.17 Similarly, policy PN4 for Streatham supports regeneration that is sensitive to the centres conservation area status and valued heritage assets. Unlike Brixton, the policy for Streatham identifies areas where taller landmark buildings of 'four storeys and above' are preferred (Streatham Hill and Streatham South). A maximum height has not been provided, however 'the scale and form of development will need to be appropriate to its location and relationship with the conservation area. Although not referred to in policy PN4,

policy Q27 will also apply (as indeed all other Local Plan policies). In clause (b) it states that redevelopment of appropriate sites with buildings up to six storeys will be sought. The purpose of the landmark buildings in Streatham Hill and Streatham South is to reinforce a sense of destination. It is uncertain whether a six storey building in Streatham Central will detract in any way from the purpose of the landmark buildings (i.e. destination) in Streatham Hill to the north and Streatham South should these landmark buildings be four to six storeys in height, or indeed if they are not at least a few storeys taller than a six storey building proposed for Streatham Central. The likelihood of this scenario arising is also uncertain. The policy team may wish to review this policy in terms of pursuing an improved quality, attractiveness and character of the built environment / urban design for Streatham.

- 5C8.4.18 It is considered that policies PN5 Clapham, PN6 Stockwell, PN7 Oval, PN9 Herne Hill and PN10 Loughborough Junction will likely result in significant positive effects for the built and historic environment. All these policies seek to respect and reinforce the historic character and assets of the centres and ensure they are community centres for people with improvements to public realm.
- 5C8.4.19 Policy PN8 for West Norwood / Tulse Hill should also result in significant positive effects for SA Objective 8. Taller buildings are provided for in specific locations and are proposed to act as focal points and destinations. Unlike Brixton and Streatham policies, the policy for West Norwood / Tulse Hill identifies building heights of four to six storeys as landmark buildings in specified locations. The policy also seeks to respect the heritage environment and interest of West Norwood cemetery and the many listed buildings of the area. The policy also recognises locally important views and supports improvements to the public realm.

**Recommendation 116:** That the policy team review use of terminology for Vauxhall Cross. The London Plan identifies Vauxhall as a future CAZ area, while the Local Plan has classified it as a district centre.

**Recommendation 117:** Policy PN2 for Vauxhall - given a new district centre (or CAZ) will be created, it may be worth emphasising that buildings and architecture that reflect the cultural diversity, including equalities groups will be supported.

**Recommendation 118:** That policy PN3 for Brixton is reviewed with reference to building heights that would be acceptable for the different areas making up Brixton Town Centre.

**Recommendation 119:** That the policy team review policy PN3 (i) with reference to historic frontages and policy Q23.

**Recommendation 120:** That policy PN4 for Streatham is reviewed in terms of building height that allows a situation to arise where a six storey building in Streatham Central may detract from the purpose of the landmark buildings (i.e. destination) in Streatham Hill and Streatham South should these landmark buildings be four to six storeys in height, or indeed if they are not at least a few storeys taller than a six storey building proposed for Streatham Central.

**5C8.5 Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

5C8.5.1 All sites in Table 33 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 8.

**Table 32: Significance criteria for SA Objective 8: Built and Historic Environment**

Positive	Negative
<ul style="list-style-type: none"> <li>• Site will not impact on conservation areas, listed buildings and features of cultural and archaeological interest or their settings, and will contribute to protecting these features and their settings.</li> <li>• For tall buildings, site located in opportunity area identified for tall buildings and valued view protected.</li> <li>• Allocation contributes positively to open space provision and the quality of the public realm</li> </ul>	<ul style="list-style-type: none"> <li>• <b>*Site contains a nationally important archaeological site (Scheduled Ancient Monument)</b></li> <li>• Potential impact on conservation areas, listed buildings and features of cultural and archaeological interest or their settings.</li> <li>• For tall buildings, site not located in opportunity area identified for tall buildings or impacts upon valued views.</li> <li>• Site would reduce open space provision or impact adversely on the public realm.</li> </ul>

\* **Indicates high level constraint**

**TABLE 33: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 8: BUILT AND HISTORIC ENVIRONMENT**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- allocation retains 10 Royal Street and Holy Trinity Urban Centre that are considered to make a positive contribution to the conservation area</li> <li>- Allocation contributes positively to open space provision and the quality of the public realm by restricting building heights in the southern part of the site due to its proximity to Archbishop Park</li> </ul>	<ul style="list-style-type: none"> <li>- may impact on conservation areas, listed buildings and features of cultural and archaeological interest or their settings</li> <li>- site is in an archaeological priority area</li> </ul>	<p>Design principles include:</p> <ul style="list-style-type: none"> <li>--a layout that includes gaps between buildings to allow views through to the conservation area and registered park</li> <li>-- fronts onto and creates clear pattern of streets</li> <li>-- does not appear dominant from the south (where heritage assets are)</li> </ul> <p>- Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies</p>
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2		<ul style="list-style-type: none"> <li>- may impact on Grade II listed building on adjoining site</li> </ul>	<p>Design principles include:</p> <ul style="list-style-type: none"> <li>--building form with a stepped approach with building height of 2-4 storeys</li> <li>-- due consideration to neighbours in terms of overbearing impact, loss of light, privacy, noise and disturbance</li> </ul> <p>- Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies</p>
3	Vale Street Depot, Vale Street SE27		<ul style="list-style-type: none"> <li>- Site allocation may potentially impact on the West Norwood Conservation Area to the west.</li> <li>- Site may impact on the Grade II listed cemetery adjoining the west of the site.</li> <li>- Site may impact on Grade II and II* listed monuments and boundaries of West Norwood Cemetery which adjoin to the west.</li> <li>- Site may impact on locally listed sites to the north and the north west of the site.</li> </ul>	<p>Design principles include:</p> <ul style="list-style-type: none"> <li>--respect setting of adjoining conservation area ad listed monuments and the adjoining locally listed building</li> <li>-- ensure buildings do not impinge on the view of West Norwood Cemetery to St Stephens Church, Sydenham Hill</li> <li>-- due consideration to neighbours in terms of visual intrusion overbearing impact, loss of light, privacy, noise and disturbance</li> </ul> <p>- Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies</p>
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- Allocation contributes positively to open space provision and the quality of the public realm</li> <li>- site is within an opportunity area, however no desired building height for the site is provided</li> <li>- design principles seek to maximise high quality design specific to the site and setting</li> </ul>	<ul style="list-style-type: none"> <li>- May potentially impact on conservation areas</li> <li>- May potentially impact Grade II and locally listed buildings near the site.</li> </ul>	<p>Design principles include:</p> <ul style="list-style-type: none"> <li>--varied footprint and skyline with development broken up to avoid replicating the wall like separation of York Rd from Waterloo Station</li> <li>--active frontages</li> <li>- improves/treats exposed flank wall of Victory Arch</li> </ul> <p>- Compliance with other draft Local Plan policies,</p>

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				particularly Quality of Built Environment policies
5	Shell Centre, 2-8 York Road SE1	- Allocation contributes positively to the quality of the public realm, including setting of Jubilee Gardens and improved links to Waterloo Station - site is within an opportunity area and allocation states that subject to impact on views and residential amenity taller buildings towards the north of the site may be acceptable - design principles seek to maximise high quality design specific to the site and setting -- design principles and key considerations relate to historic and built environment	- Site allocation is within the South Bank Conservation Area. - Site will impacted on the locally listed Shell Garage within the area. - Site may potentially impact on the locally listed County Hall North Block to the south of the site. - The site is within an Archaeological Priority Area.	Design principles include: -- <i>retaining Shell Centre as a landmark</i> -- <i>frame and enhance setting of Jubilee Gardens</i> -- <i>retains view of London Eye from York Road</i> -- <i>addresses perceived canyon-like character to York Road</i> - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
6	Waterloo Station, Waterloo Road SE1	- allocation contributes positively to public realm - Site is within opportunity area however no guidance on height limits is provided except that design principles include consideration of impact on views and heritage assets on provision of any tall buildings over the station - design principles and key considerations relate to historic and built environment	- the site itself is locally listed - Site will impact on surrounding conservation areas and locally listed buildings. - Site may impact on surrounding locally listed buildings.	Design principles include: -- <i>sympathetic retention of listed Victory Arch and careful integration into new scheme</i> -- <i>sets back and steps back development from Lower marsh to address the setting of the conservation area and listed Fire Station</i> -- <i>active frontages</i> - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
7	Cornwall Road Bus Garage, Cornwall Road SE1	- Site is within opportunity area however the reference to building height is unclear and it is recommended this is reviewed (bullet point four of design principles) - site provide public realm improvements particularly for cyclists and pedestrians	- site is close to grade II listed buildings	- Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	- site is within an opportunity area and design principles seek to manage height, bulk, views and historic built form of area - allocations supports sympathetic reuse of the listed buildings without radical alteration or extension - design principles and key considerations relate to historic and built environment specific for the site - creating of new publically accessible internal square	- Impact on Grade II* listed buildings on site. - Site allocation will impact on the Albert Embankment conservation area. - Potential impact on Grade II* listed buildings to the East and the West of the Site. - The site is within an Archaeological Priority Area. - site within 'background areas' of strategic views from Primrose Hill to the Palace of Westminster and from Parliament Hill to the Palace of Westminster	Design principles include: -- <i>silhouette of head quarters protected as viewed from across river</i> -- <i>ventilation obelisk retained</i> -- <i>does not obscure views of headquarters from Lambeth High Street</i> -- <i>ensures site continues to make positive contribution to townscape</i> - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
9	Keybridge	- site within an opportunity area and allocation	- Impact on heritage assets within the vicinity.	Design principles include:

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	House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	limits building height to 150m 'with buildings to the east of the viaduct reducing in scale to relate to existing residential buildings'; however the whole site is east of the viaduct. - allocation provides for public realm improvements and open space provision through new urban square and linear park - design principles and key considerations relate to historic and built environment specific for the site	- Potential impact on the Vauxhall Conservation Area to the north east. - Potential impact on Grade II* listed buildings to the East of the Site.	-- <i>protecting setting of adjoining conservation area and St Anne's Church</i> -- <i>avoids unacceptable canyon like development to the railway viaduct and allows views between buildings to provide views to the south</i> - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	- site within an opportunity area and allocation limits building height to 150m - allocation provides for public realm improvements and open space provision through new urban square and linear park - retains listed building fronting Wandsworth Road	- site is within an Archaeological Priority Area - potential impact on grade II listed buildings in surrounding area	Design principles include: -- <i>sets out buildings to define the street and spaces to be built to the back edge of pavements</i> -- <i>provides opportunities for public art</i> -- <i>avoids unacceptable canyon like development to the railway viaduct and allows views between buildings to provide views to the south</i> - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	- site is within opportunity area and building heights are restricted to 150m - allocation provides for public realm improvements and new public square to north of site	- Site may potentially impact of Grade II listed building to the west of the site. - Site is within an Archaeological Priority Area.	Design principles include: -- <i>sets out buildings to define the street and spaces to be built to the back edge of pavements and establishes a sense of place</i> -- <i>river linkages</i> - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
12	Somerleyton Road SW9	- allocation supports development that retains Carlton Mansions and allows continued public appreciation of the mural Nuclear Dawn	- Site may impact on conservation areas to the north of the site. - Site may impact on the Grade II listed Brixton Village to the north of the site. - Site may impact on locally listed sites to the north and the north west of the site.	Design principles include: -- <i>has an appearance from the railway line with significant gaps between buildings to give views across the site</i> -- <i>protects line of plane trees</i> -- <i>avoids monotony along frontage</i> - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
13	Popes Road	- allocation provides public realm improvements	- Site allocation may potential impact on the	Design principles include:



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	SW9	and integration with development on Brixton Central site	Brixton Conservation Area to the north and west. - Site may impact on the Grade II listed former St John's School to the north of the site	--provides a tall building with adequate public space at its base - protects character of adjoining conservation area and setting of listed former St John's school - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
14	Brixton Central (between the viaducts) SW9	- allocation provides for public realm improvements - allocation consider low development as appropriate	- Brixton Station is within the Brixton Conservation Area. - site may impact on nearby Grade II listed Brixton Village and locally listed Walton Lodge Laundry	- Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
15	SW2 Enterprise Centre	- allocation provides for public realm improvements and new outdoor civic open space	- Site contains listed Grade II (Town Hall) and locally listed (Ivor House and Electric Brixton) buildings - site will impact on Brixton Conservation Area as most of site is within it - site may impact on adjoining conservation areas and there are other important listed building nearby	Design principles include: --careful consideration of heritage assets and guidance on specific facades and external envelopes - building heights require careful consideration, especially if proposed as higher than existing -- redevelopment of Hambrook House should respect St Matthews Church and impact on townscape, street scene and conservation area - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies
16	260 – 367 Norwood Road SE27	- There are no heritage assets on or close to this site - allocation provides for public realm improvements and a new public square	- Potential impact on surround conservation areas	Design principles include: -- respect rich conservation value and heritage of the town centre taking account building heights, setting and locally important views -- finer grain development rather than single block - Compliance with other draft Local Plan policies, particularly Quality of Built Environment policies

**Recommendation 121:** Site 8: Cornwall Road Bus Garage, Cornwall Road SE1, that the allocation is reviewed with respect to the provision of building height.

**Recommendation 122:** Site 10: Keybridge House, that the allocation is reviewed with respect to building height – design considerations states that building height must not exceed 150m with buildings to the east of the viaduct reducing in scale to relate to existing residential buildings. The whole site is east of the viaduct. Policy PN2 states that 150m buildings are appropriate in and around Vauxhall Cross. This site is at the furthestmost southern part of the Miles Street character area and therefore a lower maximum building height (than 150m) may be appropriate for the western part of the site, with heights reducing in scale towards the east. The draft SPD for Vauxhall identifies this area as an 'area of tall building sensitivity'

## 5C8.6 Summary of Policies and Site Allocations

5C8.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the amended Local Plan policies and site allocations will have positive effects on the existing baseline and in preserving and enhancing areas and buildings for their historic and/or archaeological interest and in the protection of their settings.

**Table 34: Summary assessment of effects of draft Local Plan on built and historic environment**

Assessment of effects of the Local Plan on SA objective 8	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
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 Local Plan contains sound policy to ensure Conservation Areas, listed buildings and settings, locally listed buildings, areas of archaeological potential valued views are protected appropriately. It is therefore considered that the key sustainability issues identified in Table 3 relating to heritage and the built environment are well provided for in the Local Plan.</p> <p>The Local Plan also contains robust policies for the quality of the built environment including urban design of developments and public realm and protection of open space. A recommendation has been made to ensure extensions and additions requiring planning permissions do not result in adverse effects on adjoining neighbours or unacceptable harm on local biodiversity and habitats values. Guidance on appropriate building heights in particular town centres is recommended.</p> <p>Achievement of SA Objective 8 is dependent on delivery of necessary infrastructure to support growth, particularly relating to Vauxhall such as the northern line extension to Nine Elms, increased school places and healthcare. Such infrastructure is constrained by funding and long time frames but it is considered that the Local Plan policies provide the policy framework to enable significant effects for SA Objective 8. There is current uncertainty on delivery of some infrastructure.</p>	The positive impact of preserving areas and buildings designated for their historic and/or archaeological interest will be achieved immediately, and continue to be over the long term for the Boroughs Conservation Areas and listed buildings and locally listed buildings. The positive impacts of enhancing areas and buildings will likely be achieved in the medium to long term as funding becomes available and as sensitive development in surrounding areas occurs.	Permanent and ongoing

## 5C8.7 Recommendations for monitoring likely significant and uncertain effects

5C8.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- 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 approved Archaeological Assessment Statements
- Annual update Infrastructure Schedule

## **5C9. TRANSPORT AND TRAVEL**

5C9.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

Objective 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.

5C9.0.2 To achieve this objective, plan policies should reduce travel; encourage a shift to more sustainable forms of travel: walking, cycling and public transport; encourage greater efficiency in the transport network, such as through higher load factors; and integrate new development, especially residential development, with sustainable transport choices.

### **5C9.1 Relevant policy objectives**

#### National Level

5C9.1.1 Current national transport policy is set out in the government's *Transport White Paper: The Future of Transport – A Network for 2030*. It identifies a need for a transport network that can meet the challenges of a growing economy and the increasing demand for travel, but one that can also achieve environmental objectives. Overall the key thrust of national policy is to reduce demand for the need to travel, particularly by car, to better manage the road network and to promote greater use of public transport, walking and cycling.

5C9.1.2 The *NPPF 2012* states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.

#### Regional Level

5C9.1.4 The strategic approach of integrating transport and development in the *London Plan (2011)* is to encourage patterns of development that reduce the need to travel, especially by car. Improved capacity and accessibility of public transport, walking and cycling should be encouraged. Chapter 6 of the Plan provides policy on transport provision.

5C9.1.5 Policy 6.5 is on funding Crossrail and other strategically important transport infrastructure. The London Plan identifies the extension of the Northern Line to serve the Battersea area as an example of such infrastructure. The London Plan states this would be needed to realise the full potential of the Vauxhall, Nine Elms and Battersea Opportunity Area, delivering at least 10,000 new homes, 15,000 jobs and regeneration of Battersea Power Station.

### **5C9.2 Baseline conditions and existing issues**

5C9.2.1 There are fourteen over-ground railway stations spread evenly throughout the borough. There are also eight underground stations mainly in the north of the borough, and many bus routes, with major interchanges at Waterloo, Vauxhall and Brixton (see Figure 5). Waterloo is the busiest over-ground terminal in England by passenger numbers. Access to public transport is good in north and central Lambeth. However, residents in Streatham and West Norwood are dependent on rail and bus connections. These tend to be focussed on the main north-south radial routes into central London rather than east-west orbital routes, which means that some housing estates in particular continue to have low levels of public transport accessibility.

- 5C9.2.2 Accessibility to public transport is important to ensure that people can move around Lambeth with ease. As Lambeth is amongst the highest nationally for households with no car or van (in line with Inner London) (Census 2011), there is even more reliance on public transport. Lambeth residents have a total of 67,000 cars, compared to 73,000 in 2001. the proportion of households with no car or van has increased from 51% to 58% (Census 2011). However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. This situation will worsen with increasing living and working populations. Ultimately this will impact on access to jobs, Lambeth's economic wellbeing and the attractiveness of the borough to investors.
- 5C9.2.3 The Infrastructure Schedule provides details of proposed transport projects that seek to improve transport in the Borough. For example, the East London Line extension to Clapham Junction seeks to increase capacity of the London Over-ground network. A new station will be provide at Clapham High Street. Funding has been committed for this part of the project. The project offers opportunity to link Brixton to this Overground network, which would benefits the Borough, particularly residents of Brixton. However, funding has not been committed to provide a new station at Brixton for the East London Line Extension. An appropriate replacement for the former Cross River Tram is also proposed in the Schedule. This seeks to alleviate over-crowding on the Northern line and main line rail stations along its route. It would provide interchanges with twelve tube stations on nine different lines and four main-line stations. Again, funding has not been identified to further this proposal. The Northern Line Extension with a new station at Nine Elms will enable and support development and growth within the Vauxhall Nine Elms Battersea Area. It is expected to be funded by the private sector, although to date, full funding had not been committed and remains uncertain. Indeed the delivery of the extension is uncertain until it has been approved through the Transport Works Act Order and Treasury.
- 5C9.2.4 Journey times on buses have improved significantly in the borough over the last five years. Bus speeds have increased or remained stable across the AM-peak, Interpeak and PM-peak period, unlike other central London boroughs where speeds have decreased. Excess Wait Time (EWT) has reduced by 49% from 2.34 minutes (1999/00) to 1.18 mins (2008/09).
- 5C9.2.5 In 2001, approximately 90,000 people travelled out of Lambeth to work every day and another 61,500 travelled into Lambeth from other parts of London (2001 Census). Nearly 60 per cent of Lambeth workers travel to work by public transport, compared to just 14 per cent nationally. Much of the public transport infrastructure in Lambeth is currently operating at or over capacity during peak hours.
- 5C9.2.6 The Cross River Tram (CRT) project, for a new tram that would run from Brixton and Peckham to Camden and King's Cross via Euston and Waterloo was first proposed in 2002. Due to funding constraints this project is on hold and instead discussions with partners on potential alternatives to the scheme are occurring.
- 5C9.2.7 The Council operates three electric charge points in the Borough. The electric charge points are located in:
- Pulross Road, Brixton. SW9 8AA
  - Upper Ground, Waterloo SE1 9PP
  - Concert Hall Approach, Waterloo. SE1 8XU
- 5C9.2.8 Car owners in Lambeth are currently being given the opportunity to exchange their resident's parking permits for free car club membership and drive time.

- 5C9.2.9 The borough has an extensive network of footway's adjacent to the highway network and these are used for the majority of walking trips in Lambeth. Lambeth also has three strategic walking routes. These are the Capital Ring, Jubilee Walkway and the Thames Path. The borough also has a number of green spaces and parks that are used by pedestrians as a traffic free alternative.
- 5C9.2.10 There are more than 20 docking stations for the Barclays Cycle Hire Scheme in Lambeth Borough. Waterloo Station is the most frequently used docking station for both docking and hiring (TfL website July 2012). In addition the Borough has a good network of cycle routes including Cycle Superhighway Route 7 from Merton to the City (route 5 from Lewisham to Victoria via Vauxhall is expected to be in place by 2013), London Cycle Network routes 3, 5 and 25 and National Cycle Route 4.
- 5C9.2.11 There are many busy A-roads in Lambeth including the A23 main road from London to Brighton which runs the length of the borough, the A3 which runs south from Elephant and Castle through Kennington, Stockwell and Clapham, and the A205 South Circular Road which cuts East-West across the borough. The total length of road network in Lambeth is 390.2 km (Oct 2007). Traffic congestion is a serious concern for residents, with a perception that major roads can divide communities.
- 5C9.2.12 Whilst Crossrail does not affect the borough directly, it may allow a more convenient interchange for travel around London for certain journeys. It has the potential to move investment away from Lambeth and to areas which will be served by Crossrail, and also limits available funding for other schemes in the Capital.
- 5C9.2.13 Developments in the Vauxhall area are exempt from paying contributions as set out in the Mayor's Crossrail SPD, instead all contributions will be retained for local transport schemes as a reflection of the lack of benefit to Lambeth of the Crossrail scheme.
- 5C9.2.14 However, the Mayor has recently implemented the CIL Levy which is intended to provide up to £300M funding for Crossrail. This includes all developments within Lambeth including Waterloo and Vauxhall. This is on top of any local CIL and s106 requirements and has the potential to affect viability of development within Lambeth, meaning that it may not be possible to obtain appropriate mitigation measures from developers.

### **5C9.3 Likely evolution without the Plan**

- 5C9.3.1 The Core Strategy and saved UDP policies will be considered out-of-date under the NPPF and accordingly reliance will be had to policy within the Local Plan and NPPF. Opportunities for local transport improvements (including walking, cycling and public transport) and an integrated approach to development may be lost in the absence of the Local Plan.

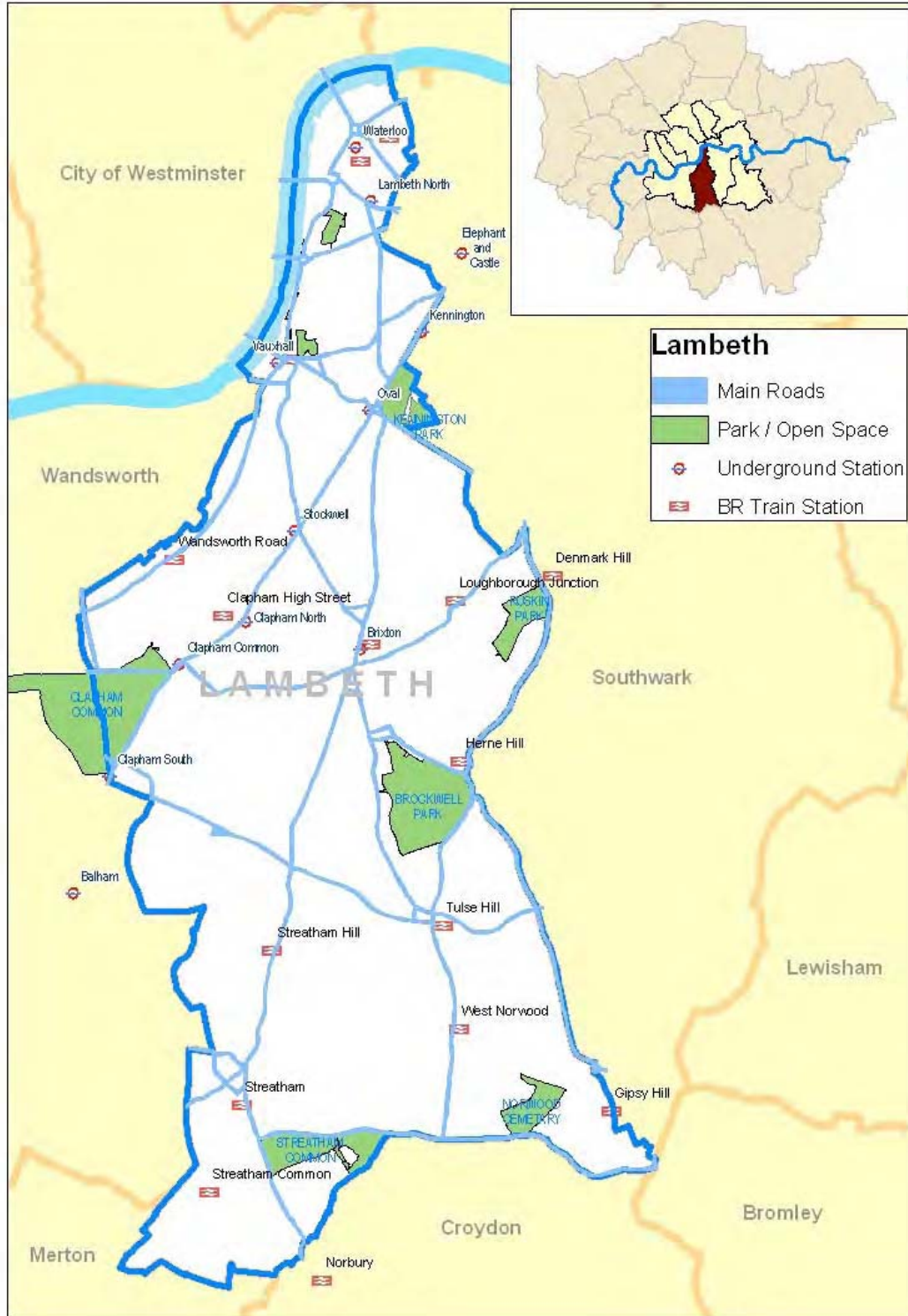


Figure 5: Main public transport provision in Lambeth

## 5C9.4 Assessment of Policies

### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

5C9.4.1 The main policies relevant to achievement of the SA Objective are:

D1 – Delivery and monitoring	ED13 – Hotels and other visitor accommodation
D2 – Presumption in favour of sustainable development	ED14 – Markets
D3 – Infrastructure	S2 – New or improved community facilities
D4 – Planning obligations	T1 – Sustainable travel
H1 – Maximising housing delivery	T2 – Walking
H6 – House conversions	T3 – Cycling
H7 – Student housing	T4 – Public transport infrastructure
H8 – Housing to meet specific community needs	T5 – River transport
H9 – Hostels and houses in multiple occupation	T6 – Assessing impacts of development on transport capacity
H10 – Gypsy and Traveller Needs	T7 – Parking
ED3 – Large offices	T8 – Servicing
ED4 – Work-live development	T9 – Mini-cabs, taxis and private hire vehicles
ED5 – Railway arches	EN7 – Sustainable waste management
ED8 – Night-time economy and food and drink uses	PN1 – Waterloo
ED11 – Loss of retail uses (A class) outside town centres	PN2 – Vauxhall
ED12 – Visitor attractions, leisure, arts and culture uses	PN3 – Brixton
	PN4 – Streatham
	PN5 – Clapham

#### ***Delivery and Monitoring policies D1 – D4***

5C9.4.2 Policies D1- D4 will contribute towards the attainment of SA Objective 9 through working with a range of partners (including Transport for London and Network Rail), delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including infrastructure to support growth. The Council will work with a range of partners and encourage dialogue between service providers and developers. Section 106 funding will provide or fund local improvements such as those to public realm, walking and cycling improvements, transport infrastructure, highways and traffic works, car clubs, parking restrictions and travel plans which will likely result in positive effects on travel and transport in the Borough. However, deliverability of major transport projects can be uncertain, for example replacement of the proposed Cross River Tram, timely delivery of Northern Line extensions and it is critical public transport capacity and infrastructure keeps pace with increased population resulting from proposed significant growth, including housing.

#### ***Housing policies H1, H6 – H10***

5C9.4.3 Policy H6 seeks to protect family sized homes from conversions. The policy seems to allow conversions on the main road network, or for family homes that are larger than 150 sqm, provided a number of criteria are met, one being that the proposal does not have an unacceptable impact on parking conditions and traffic congestion in the area. Conversions on the main road network are likely to have good access to public transport (particularly buses) and it is considered that the policy seeks to avoid increases in the overall level of road traffic. Policy H7 provides for student housing which among other criteria, need be located in an area with good public transport access and access to local shops, workplaces, services and community facilities. Recommendation 44 made in the appraisal against SA Objective 3 is further endorsed under SA Objective 9.

5C9.4.4 Similarly, policies H8 (housing to meet specific community needs), H9 (hostels and houses in multiple occupation) and H10 (gypsy and traveller needs) seek to provide these housing types in locations that are accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended users (H8 and H9).

These uses need be on a site and in a location suitable for the particular use having regard to amenity, transport and other environmental impacts. It is noted that housing to meet specific community needs such as sheltered housing with care support, nursing care homes, extra care housing and supported housing provision for children, older persons and other client groups, need only be *accessible to public transport*, shops etc, while student housing should *have good public transport access* (emphasis added). There may be equity and fairness implications of this policy as it is unclear what the access to public transport and services need be. Proximity and accessibility to public transport and other services is important to enable more independence to these vulnerable groups. It is also noted that the policies H8 and H9 (clauses (a)(iv)) state that such access should be *appropriate to the needs of the intended users*. Incorporation of the PTAL standard in the policies or supporting text may be appropriate to provide some minimum guidance of acceptable access. It is recommended that the policy team revisit these policies. It is noted that policy T1 states that development will be required to be appropriate to the level of public transport accessibility and capacity in the area.

**Recommendation 123:** That policies H8 and H9 (a)(iv) are reviewed in terms of their accessibility to public transport, shops etc with the view of perhaps providing guidance in terms of PTAL levels in the policy or supporting text.

**Reasonable Alternatives (RAs)**

*The RAs for policy H7 student housing include capping student housing levels when certain levels are met in certain areas; and setting a cap on student housing in Lambeth as a whole. Provided that student housing is located in areas of good public transport accessibility, the alternative approaches to capping student housing numbers is unlikely to have significant impact on SA Objective 9.*

*The RA identified for policies H8 (housing to meet specific community needs) and H9 (hostels and houses in multiple occupation) include not resisting the loss of these housing types. The effect of this alternative approach is considered neutral with respect to SA Objective 9.*

*There are no identified RAs for policies H6 and H10.*

**Economic development and town centre policies ED3 – ED5, ED12 – ED14**

5C9.4.5

Policy ED3 states that outside of specific locations, large office development will only be supported where the PTAL level is 4 or above, and therefore seeks such development that encourages and integrates new development with sustainable transport choices and access. Policy ED5 ensures that railway arches are not used for commuter parking. Visitor attractions, leisure, arts and cultural uses are supported in specific locations in the Borough (policy ED12) and any such proposals require a visitor management plan on how the potential impacts of high volumes of visitors will be managed. While not stated in the supporting text, it is expected that an element of the visitor management plan would relate to travel and transport, including public transport, walking and cycling. Policy ED13 seeks to integrate planning and transport by stating that hotels and other visitor accommodation outside of specified locations should be located in areas with PTAL 'good' or above. In addition to transport policies promoting active travel, it is considered that positive effects on SA 9 should result from the economic development and town centre policies.



**Reasonable Alternatives (RAs)**

*The RA identified for policy ED5 railway arches is to only allow industrial uses and/or car parking in the arches. However the latter would be contrary to other Council policy on discouraging private vehicle car use. In terms of SA Objective 9, it is considered that car parking in railway arches would be contrary to SA Objective 9.*

*The RA for policy ED13 is to not control loss of visitor accommodation. Given visitor accommodation needs to be located in areas of good public transport accessibility, any loss of visitor accommodation to a different landuse (for example mixed use development, residential, office, community etc) is likely to be in a location close to existing public transport. Accordingly, the alternative is unlikely to have significant adverse impacts on SA Objective 9, although any replacement use should be such that it maximises its public transport accessibility.*

*There are no RAs identified for policies ED3, ED4, ED12 or ED14.*

**Social infrastructure policies S2**

- 5C9.4.6 Policy S2 on new or improved community premises states that ‘the site or buildings are appropriate for their intended use and *accessible* to the community’. The supporting text states that new community premises should be conveniently located for those who use them and fully accessible to all sections of the community. It is therefore unclear whether *accessible* in this context refers to public transport accessibility. For other landuses (e.g. large commercial offices, student housing, visitor attractions and hotels) the Local Plan seeks PTAL of 4 or more. It is considered that community facilities play an important role in everyday social well-being, particularly for local residents (even more so for vulnerable groups), and therefore should also be located in areas with good public transport accessibility. The supporting text states that places of worship are encouraged in areas of high public transport accessibility, such as town centres, given their potential impact on highways. Clause (a)(ii) seeks to minimise traffic generation, congestion, parking and negative impacts in road safety. It is recommended that provision of public transport is included in the policy, as it is in other Local Plan policies for other types of landuse. Clause (c) of the policy states that large residential schemes and housing estate regenerations should include appropriate provision of social infrastructure and local shops to meet local demand where this cannot be met through existing facilities. This is commended as it seeks to reduce the need to travel.

**Recommendation 124:** That the policy team consider incorporating reference to public transport accessibility (or guidance or standards) into policy S2 or its supporting text.

**Transport policies T1 – T9**

- 5C9.4.7 Overall it is considered that all transport policies (T1 – T9) will likely result in significant positive effects on SA Objective 9, particularly policy T1 that makes clear the Council will promote a sustainable pattern of development in the borough, minimising the need to travel and reducing dependence on the private car. Policies T2 and T3 seek to improve conditions for active travel. It is considered that ‘desire lines’ should be incorporated into policy T2 (c). Similarly, policy T4(d)(ii) could be improved through taking account of desire lines in proposals to improve or provide new public transport infrastructure and interchange facilities. Previous recommendations made to transport policies in appraisals against SA Objective 2 and 4 are further endorsed against SA Objective 9.
- 5C9.4.8 Policy T6 provides guidance on assessing impacts of development on transport capacity. It is recommended that the following points are considered for inclusion to clause (a): ‘traffic generation’, ‘impact on traffic flows’, and ‘local parking’. These are effects of transport and travel that have been included on other policies (for example policies S2, ED8), and for consistency and comprehensiveness should probably be included in policy T6. This amendment would improve opportunities to reduce the overall level of road traffic in line with SA Objective 9. Servicing is covered within policy T8. Recommendation 77 made in appraisal of SA Objective 6 is further endorsed under SA Objective 9.

**Recommendation 125:** Include consideration of 'desire lines' in policy T2(c). For example: 'In considering development proposals, Lambeth will aim to secure an improved environment for pedestrian, with particular regard to their safety, convenience and directness of movements, including footway widening, provision of new routes and desire lines.'

**Recommendation 126:** Include desire lines in policy T4(d)(ii) by adding to the end: 'and consideration of desire lines'.

**Recommendation 127:** Consider including the following to policy T6(a): 'traffic generation', 'impact on traffic flows', and 'local parking'.

**Reasonable Alternatives (RAs)**

*No RAs have been identified for the transport policies except for parking policy T7 whereby the alternative is to devise our own parking standards rather than rely of London Plan parking standards. If car parking numbers are significantly less than London Plan standards for developments then the alternative would be supportive of SA Objective 9.*

**Environment policy EN7**

5C9.4.9 Waste management does not necessarily reduce travel as waste vehicles are needed to collect and dispose of Borough waste. However, proposals for new and improved waste facilities will be assessed against Annex E of PPS 10 which includes traffic and access, and policy T8 on servicing will also apply for waste vehicles.

**Reasonable Alternatives (RAs)**

*The RA for policy EN7 waste management is to allocate sites for waste management rather than indicate broad locations (as proposed). While allocating waste sites to land on or near main arterial routes and road suitable for heavy vehicles would be supporting SA Objective 9; the sites may not necessarily be best suited for the operation of waste management in terms of efficient routes and reducing the need to travel.*

**Places and neighbourhoods policies**

5C9.4.10 Policy PN1 on Waterloo maximises its strategic location and high public transport accessibility by providing for a range of uses including tourist / leisure / entertainment, offices, hotels, healthcare, housing, services and shopping. The policy also supports improvement in transport capacity and interchange quality of Waterloo Station, including improved permeability for pedestrians. It is considered that policy PN1 will result in significant positive effects on SA Objective 9.

5C9.4.11 Similarly, policy PN2 for Vauxhall maximises the potential of its location by supporting a range of mixed uses including retail, employment, housing, hotel, leisure, entertainment and community uses that will enable reduced need to travel. Additionally, the policy seeks to improve the transport experience including public transport capacity, walking and cycling. It is proposed that the bus station will be remodelled and the gyratory will be removed, thereby improving public realm, connectivity and more simplified road junctions and crossings. It is considered that policy PN2 will result in significant positive effects on SA Objective 9. However, delivery of infrastructure in a timely manner is uncertain given funding for the Northern Line extension to Nine Elms is not yet committed, nor is the money for the much needed capacity improvements for Vauxhall Rail Station. Some developments are already in construction so there is a real risk that developments will be occupied before the new underground station is operative. Additionally, policy ED15 seeks to provide local jobs to local people and this will include the many construction jobs in Vauxhall. There is some risk that workers are or will travel by private car, particularly if they live south in the Borough where public transport is less well served in terms of choice.

5C9.4.12 Brixton policy PN3 also seeks to capitalise on its transport infrastructure and major town

centre status by providing for mixed use development. The policy also seeks to improve the environment for cyclists and pedestrian movements and improve the quality of public transport provision, accessibility and interchange. The policy promotes sustainable forms of travel and will reduce the need to travel by local people. Measures to reduce the dominance of road traffic may further improve the town centre, and it is recommended that the policy team consider incorporating this into the policy. However an opportunity to maximise positive effects on SA Objective 9 may be lost if funding cannot be secured for a new station at Brixton on the East London Line Extension to Clapham.

- 5C9.4.13 Accessibility and use of public transport, walking and cycling are all supported in Streatham through improvements to public transport facilities, the public realm, and measures to reduce the impact and dominance of road traffic. As a major centre, Streatham also capitalises on its function as a town centre by encouraging mixed use developments. However the policy states that 'car parking appropriate to the nature and scale of the development will be sought'. Policy PN8 for West Norwood / Tulse Hill also states this. It is recommended that this reference in the policy is reconsidered by the policy team as it does not usefully encourage sustainable transport, and in some respects is contrary to policy T7 on parking. As currently worded, it suggests that car parking will always be sought / is encouraged.
- 5C9.4.14 Policy PN5 for Clapham supports enhancements to the public realm of the town centre to improve vehicle movements and the environment for pedestrians and cyclists. This should encourage more active travel and greater efficiency of the transport network on roads. Policy PN6 for Stockwell seeks to enhance sense of place by improvement to traffic and environmental conditions for pedestrians. Recommendation 14 made in the appraisal against SA Objective 1 to improve the environment for cyclists is further endorsed against SA Objective 9. Policy PN10 on Loughborough Junction seeks to maximise positive effects on SA Objective 9 as it proposes a number of sustainable transport measures such as bike hire stations, all necessary services including access to employment within close walking distance of every home, reduce the number of people driving through the area particularly for journeys less than two miles and improving walking and cycling routes.

**Recommendation 128:** That the Brixton policy makes provision to reduce the dominance of road traffic.

**Recommendation 129:** That the policy team revisit the wording of policies PN4 and PN8 regarding 'car parking appropriate to the nature and scale of the development will be sought' with the aim of softening the policy so that it does not suggest that car parking will always be sought.

**5C9.5 Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

5C9.5.1 All sites in Table 36 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 9.

**Table 35: Significance criteria for SA Objective 9: Transport and Travel**

Positive	Negative
<ul style="list-style-type: none"> <li>• Site location reduces the need to travel and promotes walking, cycling and public transport.</li> <li>• Promotes integrated transport.</li> <li>• Promotes mixed use development.</li> <li>• Promotes easy access to local services and facilities.</li> <li>• Promotes low carbon fuel technology.</li> <li>• Reduces congestion.</li> <li>• Allocations that generate high levels of trips located with high levels of public transport accessibility (i.e. less than 400m from a bus stop or train/tube station).</li> <li>• Existing transport capacity sufficient to cater for allocation/ or plans for an increase in capacity to cater for development.</li> </ul>	<ul style="list-style-type: none"> <li>• Promotes unsustainable travel patterns like private car use.</li> <li>• Segregates land uses to a degree that promotes longer trips by unsustainable modes.</li> <li>• Worsens access to key local services and facilities.</li> <li>• Fails to promote low carbon fuel technology.</li> <li>• Worsens congestion.</li> <li>• Allocations that generate high levels of trips not located with high levels of public transport accessibility.</li> <li>• Existing transport capacity insufficient to cater for allocation/ no plans for increase in capacity.</li> </ul>

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**TABLE 36: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 9: TRANSPORT AND TRAVEL**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- Allocations that generate high levels of trips located with high levels of public transport accessibility (i.e. less than 400m from a bus stop or train/tube station).</li> <li>- Site location reduces the need to travel and promotes walking, cycling and public transport.</li> <li>- Existing transport capacity sufficient to cater for allocation/ or plans for an increase in capacity to cater for development</li> <li>- Promotes mixed use development.</li> </ul>		Compliance with Local Plan policies
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	<ul style="list-style-type: none"> <li>- site within 400m of bus and rail access</li> </ul>		Compliance with Local Plan policies
3	Vale Street Depot, Vale Street SE27		<ul style="list-style-type: none"> <li>- Allocations (school) may generate high levels of trips and site is not located with high levels of public transport accessibility.</li> <li>- allocation promotes private car usage through recycle centre and may include drop-off and pick-up from school.</li> </ul>	Compliance with Local Plan policies
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> <li>- plans to increase capacity at Waterloo to cater for development</li> </ul>		Compliance with Local Plan policies
5	Shell Centre, 2-8 York Road SE1	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> <li>- plans to increase capacity at Waterloo to cater for development</li> </ul>		Compliance with Local Plan policies
6	Waterloo Station, Waterloo Road SE1	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> </ul>		Compliance with Local Plan policies

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		- plans to increase capacity at Waterloo to cater for development		
7	Cornwall Road Bus Garage, Cornwall Road SE1	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> <li>- plans to increase capacity at Waterloo and Cornwall Road Bus Garage to cater for development</li> </ul>		Compliance with Local Plan policies
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site close to public transport</li> <li>- promotes easy access to local services and facilities</li> <li>- plans to increase capacity at Waterloo and Vauxhall to cater for development</li> </ul>		Compliance with Local Plan policies
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m public transport</li> <li>- promotes easy access to local services and facilities</li> <li>- plans to increase capacity at Vauxhall and extension to Northern Line to cater for new developments in area</li> </ul>	- new primary school could increase vehicle journeys associated with drop-off and pick-up of children	Compliance with Local Plan policies
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> <li>- plans to increase capacity at Vauxhall and extension to Northern Line to cater for new developments in area</li> </ul>		Compliance with Local Plan policies
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> <li>- plans to increase capacity at Vauxhall and extension to Northern Line to cater for new developments in area</li> </ul>		Compliance with Local Plan policies
12	Somerleyton Road SW9	<ul style="list-style-type: none"> <li>- site location reduces need to travel</li> <li>- promotes mixed use development</li> </ul>		Compliance with Local Plan policies

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		<ul style="list-style-type: none"> <li>- promotes easy access to local services and facilities</li> <li>- existing transport capacity sufficient to cater for allocations</li> <li>- Part of Site within 400m of bus and rail links.</li> </ul>		
13	Popes Road SW9	<ul style="list-style-type: none"> <li>- site allocation provides for cycle parking</li> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> </ul>	<ul style="list-style-type: none"> <li>- site allocation provides for car parking which will increase traffic and congestion</li> <li>- fails to promote low carbon fuel technology</li> </ul>	Compliance with Local Plan policies
14	Brixton Central (between the viaducts) SW9	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> <li>- Site allocation improves public transport infrastructure through new station entrance and pedestrian links</li> </ul>		Compliance with Local Plan policies
15	SW2 Enterprise Centre	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> </ul>		Compliance with Local Plan policies
16	260 – 367 Norwood Road SE27	<ul style="list-style-type: none"> <li>- site location reduces need to travel and promotes walking, cycling and public transport</li> <li>- promotes integrated transport</li> <li>- promotes mixed use development</li> <li>- site less than 400m from public transport</li> <li>- promotes easy access to local services and facilities</li> </ul>	<ul style="list-style-type: none"> <li>- site allocation provision for car parking - promotes unsustainable travel patterns of using private car</li> <li>- may increase traffic and congestion</li> <li>- fails to promote low carbon fuel technology</li> </ul>	Compliance with Local Plan policies

**5C9.6 Summary of Policies and Site Allocations**

5C9.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have positive effects on improving baseline public transport use; and reducing the need to travel by promoting sustainable patterns of urban development (table overleaf).

**5C9.7 Recommendations for monitoring likely significant and uncertain effects**

5C9.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Mode of travel, particularly commute to and from work
- Number of people who work locally
- Annual update of Infrastructure Schedule.



**Table 37: Summary of assessment of effects of draft Local Plan on transport**

Assessment of effects of the Local Plan on SA objective 9	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
<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>++/?</p>	<p>++/?</p>	<p>On the whole it is considered that the Draft Local Plan has been produced with the premise of sustainable patterns of urban development actively borne in mind. Sites earmarked for future comprehensive redevelopment are in locations that have potential to facilitate efficient accessibility to both areas within and outside of the Borough.</p> <p>Similarly, appropriate town centres are allocated for high levels of growth in mixed developments, making use of current (and future) accessible transport networks. Policies effectively seek to address key transport issues in Lambeth.</p> <p>A couple of recommendations have been made that should further augment positive effects of policies. All site allocations should result in significant positive effects on SA Objective 9 although the provision of schools may increase journeys related to school drop off and pick up.</p> <p>However, while the Draft Local Plan theoretically makes provision for reduced need to travel through more sustainable patterns of urban development; the difficulty and uncertainty lies in the timely delivery of necessary improved public transport infrastructure and capacity through identified and committed funding sources (for example a new station at Brixton for the East London Line Extension, the northern line extension to Nine Elms, and an appropriate replacement for the former Cross River Tram, and Vauxhall overground capacity improvements).</p>	<p>Comprehensive achievement of this objective may be evident in the medium to long-term as larger scale developments are completed.</p> <p>Positive effects from more local measures, such as improving cycle and pedestrians paths are more likely to be evident in the short to medium term.</p> <p>The Draft Local Plan is reliant on the delivery of improved public transport infrastructure, particularly on increasing capacity during peak times. It is likely that the extension of the northern line to Nine Elms will be delivered, however it is the timing of this that is uncertain. To maximise sustainability outcomes and enable sustainable lifestyles and achievement of SA Objective 9 such infrastructure needs to be in place before occupation of the Opportunity Area.</p> <p>Currently there is no commitment to the necessary funding for a new station at Brixton for the East London Line Extension. It is uncertain if this will be delivered as it does not appear in the current TfL Business Plan. Therefore, it is recommended that the Council works to include the new station in the next TfL Business Plan, which will cover ten years from 2018.</p> <p>Annex 2 of the Local Plan sets out expected timescales for infrastructure delivery.</p>	<p>Temporary effects associated with construction of new northern line extension and other infrastructure and capacity improvements; however it is considered that these temporary effects can be managed on-site, and through agreement on working hours and days.</p> <p>Once the extension of the northern line is in place and operating, the significant positive effects for Vauxhall area in particular will be permanent.</p>

## 5C10. BIODIVERSITY

5C10.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

Objective 10: To conserve and enhance biodiversity, and bring nature closer to people.

5C10.0.2 To achieve this objective, plan policies should conserve and enhance habitats and provide for the long-term management of natural habitats and wildlife, protect and enhance access to open space and improve the quality of publicly accessible green space; 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; encourage replacement of valuable lost habitat; and bring nature closer to people i.e. help conserve local nature conservation amenity, including gardens.

5C10.0.3 Specifically designated wildlife sites, sites of special scientific interest, local and metropolitan open spaces should also be protected.

### 5C10.1 Relevant policy objectives

#### International Level

5C10.1.1 The *Directive 92/43/EEC* on the Conservation of Natural Habitats and Wild Flora and Fauna – the 'Habitats Directive' provides legal protection for habitats and species of European importance. It requires the maintenance or restoration of habitats and species of interest to the EU in a favourable condition.

#### National Level

5C10.1.2 *Working with the grain of nature: a biodiversity strategy for England (2002)* sets out the Government's vision for conserving and enhancing biological diversity in England, together with a programme of work to achieve it. It includes the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and enhance it wherever possible.

5C15.1.3 Paragraphs 109 – 119 of the *National Planning Policy Framework 2012* relate to conserving and enhancing the natural environment. The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible.

#### Regional Level

5C15.1.4 Policy 7.19 of the *London Plan (2011)* covers Biodiversity and access to nature. The policy seeks development to make a positive contribution to the protection, promotion and management of biodiversity, including enhancement of London BAP habitat targets and improving access to wildlife sites. Other policies seek to promote and protect biodiversity and green infrastructure; make provision for green roofs and; protection of open spaces.

#### Local Level

5C15.1.5 The *Lambeth Biodiversity Action Plan (2006)* contains a set of action plans for priority habitats and species which are important to Lambeth and the people who live and work in the Borough. Priority habitats are woodlands; tidal Thames; built environment; railway line sides; private gardens; ponds and open water; parks and greenspace; churchyards and cemeteries; allotments and community gardens and;

acid grassland. Priority species include stag beetle; reptiles; mistletoe; house sparrow; crucian carp; blackbird and bats.

## 5C15.2 Baseline conditions and existing issues

5C15.2.1 Lambeth has identified 10 priority habitats and seven priority species for the Borough. Lambeth has many highly valued areas of open space, but in some parts of the Borough, particularly in the north, this is in short supply relative to the level of resident population. Pressures on open spaces are expected to become more intense with population growth. There are very limited opportunities to create new public open space in the Borough, but two are the creation of the new Waterloo City Square and an extension to Jubilee Gardens.

5C15.2.2 The Borough has four Local Nature Reserves, six Metropolitan Open Land spaces, 28 district and local opens spaces, as well as a number of other smaller areas of open space. Additionally the Borough has 45 designated Sites of Importance for Nature Conservation (SINCs). Of these, 43 sites (or 96%) are or have been in positive conservation management in 5 years prior to 31/3/2012.

## 5C15.3 Likely evolution without the Plan

5C15.3.1 Without the Draft Local Plan, the Council would rely on the provisions of the London Plan, and the habitat and species action plans within the Lambeth Biodiversity Action Plan. There may be a greater risk that increased population and economic activity will place an increased demand on water, biodiversity and open space and without the Local Plan development may occur in areas that may disproportionately exacerbate issues with access to open space. Developers will still need to comply with legislation protecting biodiversity, for example Wildlife and Countryside Act.

## 5C15.4 Assessment of Policies

### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

5C15.4.1 The main policies relevant to achievement of the SA Objective are:

D1 – Delivery and monitoring	Q12 – Building alternations and extensions
D2 – Presumption in favour of sustainable development	Q14 – Cycle storage
D3 – Infrastructure	Q15 – Development in gardens
D4 – Planning obligations	Q22 – Registered parks and gardens
D5 - Enforcement	Q24 – Undesignated heritage assets
H5 – Housing standards	Q26 – Views
T5 – River transport	PN1 – Waterloo
EN1 – Open space	PN2 – Vauxhall
EN2 – Local food growing and production	PN3 – Brixton
EN4 – Sustainable design and construction	PN4 – Streatham
EN6 – Sustainable drainage systems and water management	PN5 – Clapham
Q5 – Environmental enhancement strategies	PN6 – Stockwell
Q10 – Landscaping	PN7 – Oval
Q11 - Trees	PN8 – West Norwood / Tulse Hill
	PN9 - Herne Hill
	PN10 Loughborough Junction

### ***Delivery and Monitoring policies D1 – D5***

5C15.4.2 In terms of biodiversity impacts, policy D1 that seeks to maximise use of previously developed land and vacant buildings, may result in adverse effects on local species such as bats (which roost in buildings and roofs) or black redstarts or reptiles (which

make use of brownfield environments. However, such species are protected by law, and ecological surveys required as part of planning applications should avoid adverse effects on such species and habitats. Measures such as brown roofs replicate brownfield environments. Growth, and infrastructure required to support such growth, can result in significant adverse effects upon local biodiversity unless appropriate avoidance and mitigation measures are implemented. The draft Local Plan contains policies to protect biodiversity, in addition to conditions attached to planning permissions to further protect and enhance biodiversity. Policy D4 on planning obligations also seeks to ensure that development proposals provide or fund local improvements to mitigate the impact of development. A list of improvements is then provided however biodiversity is not specifically mentioned, and it is considered that it must fall under 'other sustainability measures'. Given the importance of biodiversity, the vast benefits it provides (such as health, environmental, climate change adaptation, intrinsic and visual amenity), in particular its importance commensurate to the other improvements mentioned, and that 80% of the Borough is classified as built environment; it is recommended that the list specifically provide for biodiversity.

- 5C10.4.3 As highlighted previously (in the appraisal against SA Objective 7) there is some concern, particularly regarding cumulative impacts on biodiversity with the policy approach of policy D5 Enforcement.

**Recommendation 130:** That biodiversity is included as a bullet point in policy D4(b)

#### **Housing policy H5**

- 5C10.4.4 The significant number of new dwellings proposed for the Borough has potential to adversely impact on biodiversity and open spaces. However, other policies actively seek to protect biodiversity and designated open spaces and create new open space in areas deficient. It is estimated that about 20% of Lambeth is covered in private gardens. To further maximise this, it is considered that the Housing Standards policy provides opportunity to enhance and make a positive contribution to the Borough's biodiversity. The policy encourages family dwellings to have direct access to a private garden and new flatted developments to have shared amenity space. It is unclear whether such amenity space need be grassed or whether it may be paved. In terms of SA Objective 10, it is recommended that shared amenity space in flatted developments contributes to biodiversity and therefore should not be paved. Recommendation 17 identified against SA Objective 2, and further endorsed against SA Objectives 3, 6 and 7 is further endorsed against SA Objective 10. Given the importance of gardens to the Boroughs biodiversity (gardens are an identified priority habitat) it may be appropriate to reflect this in policy H5, for example communal gardens should make a positive contribution to local biodiversity.

**Recommendation 131:** That policy H5(b)(ii) is amended with a new bullet point so that communal gardens should also 'make a positive contribution to biodiversity'.

#### **Reasonable Alternatives (RAs)**

*The RAs identified for policy H5 are to produce Lambeth housing standards, adopt London Plan housing standards or use a combination of both (i.e. London Plan for internal standards and Lambeth standards for external standards (as proposed)). London Plan housing standards for external open space is lower than the proposed Lambeth standards. With regards to SA Objective 10, it is considered that the higher standards of open space / communal gardens included in the Lambeth standards offer more positive effects for biodiversity.*

**Transport policy T5**

- 5C10.4.5 This policy seeks to protect biodiversity of the River Thames where there are proposals for new piers or improvements to existing piers.

**Environment and green infrastructure policies EN1, EN2, EN4, EN6**

- 5C10.4.6 Open space is defined in supporting text paragraph 9.1 and it includes communal squares and gardens and front and back gardens. It is recommended that policy EN1(a) makes provision of gardens clear as follows: *'Development which would involve the loss of existing public or private open space, including parks, allotments, cemeteries/burial space, gardens and open air sports and recreational space...'*
- 5C10.4.7 Policy EN1(b) seeks to conserve and enhance biodiversity, however it is considered that as currently worded may result in adverse impacts for some biodiversity in the Borough. For example, the clause states that development that 'would result in loss, reduction in area or harm to the nature conservation value or biodiversity *status* of an open space' will be prevented (emphasis added). The use of the word 'status' implies that an open space, or indeed areas of biodiversity within the open space, need be identified or designated in some way, rather than protection of biodiversity generally. Similarly, the same sentence speaks of 'nature conservation value of the *assets* involved'. This may suggest that the open space need be identified or classified as an asset, rather than applying to an area of open space on a site, for example housing estate or community site. Likewise, the last sentence of the clause *'development proposals should wherever possible protect, enhance, create and manage sites of nature conservation or biodiversity interest in accordance with the Borough's Biodiversity Action Plan and Mayors Biodiversity Strategy'* suggests it only applies to sites already known or identified for nature conservation or biodiversity interest. To maximise positive effects in terms of SA Objective 10 the clause requires review. A proposed suggestion is provided below:
- ~~'(b) Preventing development which would result in loss, reduction in area or harm to the nature conservation or biodiversity values *status* of an open space including any designated or proposed Sites of Importance for Nature Conservation (SINC) unless adequate mitigation or compensatory measures are included appropriate to the nature conservation values of the *assets* involved. Development proposals should wherever possible protect, enhance, create and-or manage *sites of nature conservation or biodiversity interest* in accordance with the Borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy.'~~
- 5C10.4.8 Incorporation of the above recommendations should result in policy EN1 achieving more positive impacts for SA Objective 10.
- 5C10.4.9 Recommendations 26 and 58 identified in SA Objectives 2, 4 and 8 appraisals are further endorsed with respect to SA Objective 10. Community gardens and green roofs should be encouraged and supported in all major developments and make a valuable contribution to biodiversity and also bring nature closer to people. As currently worded clause (b) may not apply to mixed use developments that include residential landuse. As mentioned above with regards to policy D1, use of vacant or derelict land or buildings for food growing will need to be mindful of species on site, for example bats in roof crevasses, and reptiles or stag beetles on vacant land or in derelict buildings.
- 5C10.4.10 Policy EN4 makes reference to living roofs and walls 'where feasible and appropriate to the character and context of the development'. Recommendation 35 made in the appraisal against SA Objective 4 and further endorsed in SA Objective 6 and 8 is also supported against SA Objective 10. With exception to perhaps heritage

buildings, it is unclear how a living roof or wall would not be appropriate to the character and context of developments. It is recommended clause (c) of policy EN4 is rewritten as follows: 'all development proposals should incorporate living roofs and wall where feasible.' The policy should also require implementation of a maintenance plan for the living roof or wall. The amendment should result in more positive effects with regards to SA Objective 10 but also SA Objectives 2 (health), 7 (liveability), 11 (climate change) and 14 (air quality).

5C10.4.11 It is considered that policy EN6 on sustainable drainage systems and water management should result in positive effects for biodiversity.

**Recommendation 132:** That policy EN1(a) incorporates provision of gardens as follows: '*Development which would involve the loss of existing public or private open space, including parks, allotments, cemeteries/burial space, gardens and open air sports and recreational space...*'.

**Recommendation 133:** Buildings permitted under policy EN1(a)(iii) should include a living roof or wall given their location in an open space environment and it may be appropriate to include this as supporting text to the clause.

**Recommendation 134:** That clause (b) of policy EN1 is amended as follows: 'Preventing development which would result in loss, reduction in area or harm to nature conservation or biodiversity values-of an open space including any designated or proposed Sites of Importance for Nature Conservation (SINC) unless adequate mitigation or compensatory measures are included appropriate to the values involved. Development proposals should wherever possible protect, enhance, create or manage biodiversity in accordance with the Borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy.'

**Recommendation 135:** That clause (c) of policy EN4 is rewritten as follows: 'all development proposals should incorporate living roofs and wall where feasible.' The policy should also require a maintenance plan.

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing. It is considered this would be a lost opportunity with regards to SA Objective 10 and the boroughs biodiversity.*

**Quality of built environment policies Q5, Q10 - Q12, Q14, Q15, Q22, Q24, Q26**

5C10.4.12 Policy Q5 seeks environmental improvements including untidy sites and enhancement of dilapidated / derelict buildings and spaces. It is unclear how an 'untidy site' may be defined or identified and this should be clarified. Sites with overgrown vegetation may be perceived by some as untidy, but often such areas contain high biodiversity values. Similarly, dilapidated buildings may be accommodating protected species such as bats. Therefore, before any sites are 'remediated' and 'improved' appropriate ecology surveys will be necessary to ensure protected species and habitats will not be adversely affected or works would be contrary to the biodiversity action plan or legislative obligations. Accordingly, the supporting text may need to reflect these other possible uses of seemingly 'untidy' sites although the protection of bats and other protected species is covered on legislation.

5C10.4.13 Recommendations 95 to 100 made in the appraisals against SA Objectives 7 and 8 for policies Q10 (landscaping) and Q11 (trees) are further supported with regards to the biodiversity objective and will likely result in increased positive effects in terms of

biodiversity and bringing nature closer to people.

- 5C10.4.14 Given that policy Q12 Building Alterations and Extensions applies to all buildings and not just those within conservation areas; it may be appropriate for the policy to make reference to living roofs, particularly clauses (m), (n) and (o) of the policy which refer to the roof area of buildings. It is recommended policy review this.
- 5C10.4.15 It is recommended that clause Q14 (b) (iii) is rewritten to acknowledge gardens as a priority habitat in the Borough: 'not accept cycle storage that compromises the visual amenity or biodiversity of front gardens / forecourts.'
- 5C10.4.16 Overall it is considered that policy Q15 on development in gardens should result in positive effects on SA Objective 10. To further strengthen the policy with respect to SA Objective 10, clause (a) of the policy could be amended as follows: '...and will resist proposals which would result in the loss of biodiversity, soft landscaping, permeable drainage or openness.'
- 5C10.4.17 Policy Q22 should result in positive effects for SA Objective 10 provided biodiversity is included as a 'feature of interest'. The word 'proposed' in the first line of the policy needs to be replaced with 'permitted'.
- 5C10.4.18 Policy Q24 seeks to protect undesignated heritage assets. The Local Landscape Register will list designated spaces and landscapes, and a number of churchyards and gardens are proposed for inclusion which are likely to have significant biodiversity value. To ensure biodiversity values of these areas are protected it is recommended that the supporting text (paragraph 10.87) is amended. This can be achieved by removing the word 'built' so that all features (including natural / ecological) of interest are sustained or enhanced, rather than just built features.
- 5C10.4.19 It should be noted that living roofs can improve roofscape views (policy Q26)

**Recommendation 136:** that supporting text of policy Q5 acknowledge possible biodiversity value of overgrown vegetation on 'untidy' sites or species presence in dilapidated or vacant buildings.

**Recommendation 137:** that policy team review appropriateness of reference to living roofs in policy Q12, particularly clauses (m) – (o).

**Recommendation 138:** that clause Q14 (b) (iii) is rewritten to acknowledge gardens as a priority habitat in the Borough: 'not accept cycle storage that compromises the visual amenity or biodiversity of front gardens / forecourts.'

**Recommendation 139:** To further strengthen policy Q15 with respect to SA Objective 10, clause (a) of the policy could be amended as follows: '...and will resist proposals which would result in the loss of biodiversity, soft landscaping, permeable drainage or openness.'

**Recommendation 140:** The word 'proposed' in the first line of policy Q22 needs to be replaced with 'permitted'.

**Recommendation 141:** That the word 'built' is removed from supporting text paragraph 10.87 of policy Q24.

**Places and Neighbourhoods policies PN1 – PN10**

5C10.4.20 Overall it is considered that the places and neighbourhood policies should not result in significant adverse impacts on biodiversity. The policies generally seek to intensify landuse in established town centres through mixed use development schemes and also provide public realm improvements. All the major centres (Waterloo, Vauxhall, Brixton and Streatham) seek to improve the quality of publicly accessible green spaces and create new green spaces (pocket parks) and connect and improve existing green spaces where possible. Streatham and West Norwood/Tulse Hill policies specifically state that open space appropriate to the nature and scale of development will be sought. Given that most centres will be seeing significant regeneration / rebuilding, it may be appropriate for these policies to promote living roofs and walls. This will not only bring biodiversity benefits, but also improve local air quality. As most of the town centre policies seek to promote sustainable transport, public realm improvements, and reduce impact of road traffic; it is considered appropriate to further encourage living walls and roofs in town centre developments, particularly the major centres.

**Recommendation 142:** that the policy team consider specific provision of living roofs and walls in appropriate places and neighbourhood policies (particularly PN1, PN2, PN3, PN4, and PN8).

5C10.5 **Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

5C10.5.1 All sites in Table 39 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 10.

**Table 38: Significance criteria for SA Objective 10: Biodiversity**

Positive	Negative
<ul style="list-style-type: none"> <li>• Doesn't impact upon any site of nature conservation importance or LBAP species/habitat.</li> <li>• Improves people's access to nature.</li> <li>• Overall net gain for biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>• <b>*Site contains a nationally/internationally designated site (SSSI, SPA, SAC or Ramsar site) or Site of Metropolitan Importance</b></li> <li>• Impacts on a site of nature conservation importance or LBAP species/habitat.</li> <li>• Increases areas of nature conservation deficiency.</li> </ul>

\* Indicates high level constraint



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**TABLE 38: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 10: BIODIVERSITY**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	- Doesn't impact directly upon any site of nature conservation importance or LBAP species/habitat although the part of the site that is vacant will need to be checked for species presence.	- site development may impact on Archbishop park to the south	Compliance with legislation protecting species and habitats and local plan policies
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat.	- vacant building on site may be accommodating bats – surveys will be required	Compliance with legislation protecting species and habitats and local plan policies
3	Vale Street Depot, Vale Street SE27	- site does not directly impact upon any site of nature conservation importance however the site abuts SINC 21 - West Norwood Cemetery		Compliance with legislation protecting species and habitats and local plan policies
4	Elizabeth House, York Road SE1	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat. - improves peoples access to open space		
5	Shell Centre, 2-8 York Road SE1	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		
6	Waterloo Station, Waterloo Road SE1	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		
7	Cornwall Road Bus Garage, Cornwall Road SE1	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat - allocation design consideration includes linking new urban square, linear park and Vauxhall Park, improving accessibility		

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11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat - allocation design consideration includes linkages to new open spaces and to the east of the viaducts to Vauxhall Park, improving accessibility	- loss of temporary open space (although this isn't particularly useable)	
12	Somerleyton Road SW9	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat - allocation provides provision for open space - plane trees on grass verge at northern end of Somerleyton Road and Coldharbour Lane frontage protected		
13	Popes Road SW9	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		
14	Brixton Central (between the viaducts) SW9	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		
15	SW2 Enterprise Centre	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		
16	260 – 367 Norwood Road SE27	- Doesn't impact upon any site of nature conservation importance or LBAP species/habitat		

5C10.5.2 As demonstrated above, no sites directly impact on any site of nature conservation importance. While many of the allocations make provision for new public squares and public realm improvements; it is considered that these sites could more effectively promote biodiversity despite their urban environments. Use of living walls and roofs or landscaping that promotes biodiversity would help bring increased greenery to the sites and provide biodiversity, health and improved air quality benefits. It is recommended that the policy team review site allocations, particularly those that are Council owned, with the view specifically requiring more green features to the site (i.e. living walls or roofs).

**Recommendation 143:** that the policy team review all site allocations and incorporate living walls or roofs as design principles and key development considerations, particularly for those sites owned by the Council.

## 5C10.6 Summary of Local Plan policies and site allocations

5C10.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the draft Local Plan policies and site allocations will have a positive effect on maintaining and enhancing existing baseline conditions on biodiversity. It is considered that the Draft Local Plan seeks to conserve and enhance biodiversity, and bring nature closer to people while improving access to these areas where possible.

**Table 40: Summary assessment of effects of draft Local Plan on biodiversity**

Assessment of effects of the Local Plan on SA objective 10	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
To conserve and enhance biodiversity and to bring nature closer to people	+/?	++	<p>Given the extent of development assigned by the London Plan to the Borough, it is considered that the Draft Local Plan generally provides well for SA objective 10 and also works to enhance and improve existing baseline conditions. Recommendations to policy seek to recognise the importance gardens have for the Boroughs biodiversity; clarifies that biodiversity generally is protected rather than identified area with biodiversity status, support living walls and roofs in all developments, and tweaks to policy to strengthen biodiversity protection and enhancement.</p> <p>No site allocations directly impact on sites of conservation value or protected species or habitats.</p> <p>The Habitat Regulations Assessment – Screening Report concluded that the Local Plan will not result in any likely significant adverse effects on any European Site. Similarly, it found the Local Plan will not have an adverse impact on the integrity of the four Natura 2000 sites. Therefore, the Appropriate Assessment stage is not required on the Local Plan for Lambeth Borough.</p>	<p>The open space network is already protected, so this is already evident and will remain evident for the entire plan period.</p> <p>Biodiversity enhancement will begin to be evident in the short term as some development occurs. Increased improvements and restoration are likely in the short-medium term.</p> <p>New areas of useable open space will likely be evident in the medium to long terms as developments and public realm projects are completed.</p> <p>Construction effects may temporarily affect biodiversity in some locations (for example reuse of vacant buildings); however the law requires developers not to intentionally injure, capture or kill protected species such as bats or damage or destroy habitat such as bat roosts. It is considered that ecological surveys and advice from qualified ecologist can avoid or mitigate adverse effects on protected species / habitat. Any loss of brownfield habitat can be recreated in the form of a brown roof.</p>	<p>Permanent</p> <p>Any effects associated with construction are likely to be minimised through mitigation measures and are likely to be temporary in nature.</p>

## 5C10.7 Recommendations for monitoring likely significant effects

5C10.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Percentage of development planning approvals that have incorporated new open space
- Percentage of population located in an open space deficiency area.

## **5C11. CLIMATE CHANGE AND ENERGY**

5C11.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

Objective 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.

5C11.0.2 To achieve this objective, plan policies should seek to reduce emissions of greenhouse gases by reducing energy consumption; increase the proportion of energy both produced and used from renewable and sustainable resources; reduce the impacts of climate change (e.g. urban heat island effects, flooding, drought); ensure adaptation to the future impacts of climate change; ensure that new and retrofitted development and infrastructure is located, designed and constructed to withstand the effects of climate change over its design life; promote high quality, appropriate design and sustainable construction methods in all types of building, including new build and retrofit; promote the highest standards of energy and environmental performance for new and existing buildings and; minimise embedded carbon in new buildings and development.

### **5C11.1 Relevant policy objectives**

#### National Level

5C11.1.1 *The National Planning Policy Framework 2012* states that planning plays a key role to helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.

5C11.1.2 The *Climate Change Act 2008* imposes a duty on the Government to ensure net carbon emissions in the UK are at least 80% lower than 1990 levels by 2050, and to set a 'carbon budget' limiting net carbon emission for each period of five years (budgets for 2008-2022 have already been set).

#### Regional Level

5C11.1.3 The *London Plan (2011)* seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 percent (below 1990 levels) by 2025 and sets out guidance as to the various ways to reduce emissions, and cover the whole development process from construction to energy use of the building.

5C11.1.4 *Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy, 2011* focuses on reducing CO<sub>2</sub> emissions to mitigate climate change, securing a low carbon energy supply for London, and moving London to a thriving low carbon capital.

### **5C11.2 Baseline conditions and existing issues**

5C11.2.1 Lambeth's total CO<sub>2</sub> emissions that are within the scope of influence of the Local Authority (previously NI 186) was 1290.4 kilotonnes CO<sub>2</sub> for 2009 according to the Department of Energy and Climate Change. 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 (Department of Energy and Climate Change).

5C11.2.2 The most recent government figures, from 2008, estimate that 11.5% of Lambeth residents are in fuel poverty, however the real figure is likely considerably higher due to the rises in fuel prices since 2008. Price rises in Lambeth are likely to be in line with the rest of London. Therefore it is possible that the level of fuel poverty in Lambeth in 2011 is around 19.5% (Fuel Poverty Strategy 2011). Figure 6 shows the percentage of households in fuel poverty.

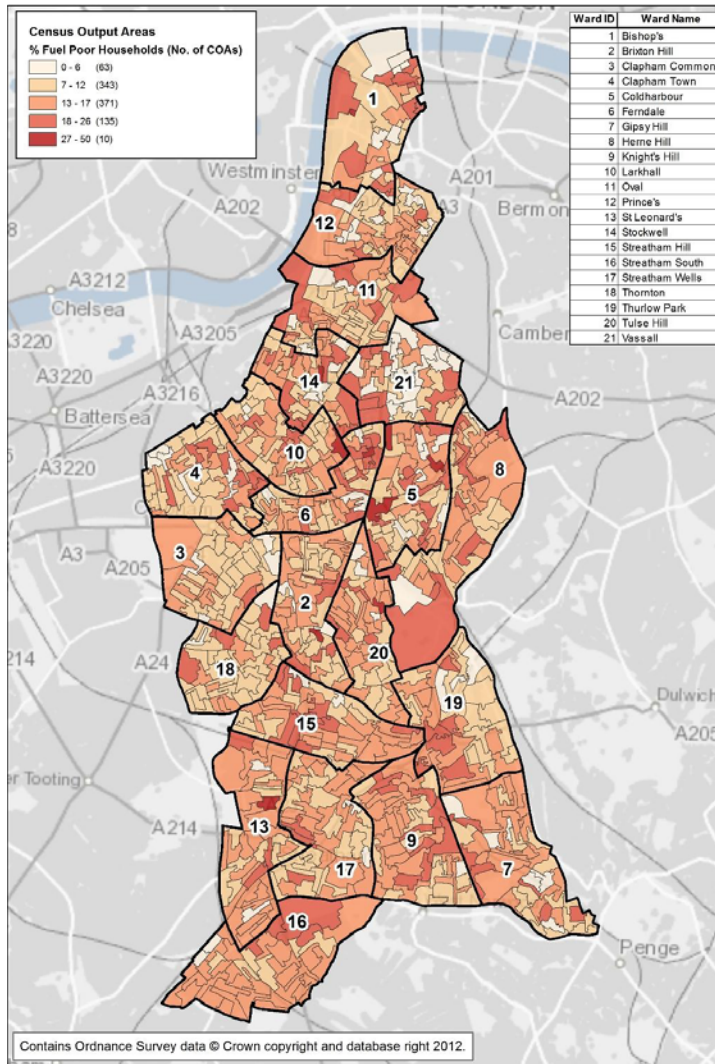


Figure 6: Percentage of households in fuel poverty

### 5C11.3 Likely evolution without the Plan

5C11.3.1 Carbon emissions are likely to rise with increasing development and could be exacerbated by proposed levels of growth if not managed in an appropriate way. Climate change could have severe ramifications for London and Lambeth's populations, economy, wildlife, cultural heritage and materials assets.

5C11.3.2 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. In the absence of the Local Plan, dwellings need not be built to Code for Sustainable Homes Level 4 and therefore levels of fuel poverty may increase.

#### 5C11.4 Assessment of Policies

##### **Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation**

D1 – Delivery and monitoring	EN1 – Open space
D2 – Presumption in favour of sustainable development	EN2 – Local food growing and production
D3 – Infrastructure	EN3 – Low carbon and energy
D4 – Planning obligations	EN4 – Sustainable design and construction
D5 - Enforcement	EN5 – Flood risk
H1 – Maximising housing delivery	Q10 – Landscaping
H5 – Housing standards	Q11 - Trees
ED1 – Key Industrial and Business Areas (KIBAs)	Q15 – Development in gardens
T1 – Sustainable travel	Q21 – Statutory listed buildings
T2 – Walking	PN1 – Waterloo
T3 – Cycling	PN2 – Vauxhall
T4 – Public transport infrastructure	PN3 – Brixton
T5 – River transport	PN4 – Streatham
T6 – Assessing impacts of development on transport capacity	PN5 – Clapham
T7 - Parking	PN6 – Stockwell
T8 - Servicing	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 - Herne Hill
	PN10 Loughborough Junction

##### ***Delivery and monitoring policies***

- 5C11.4.1 Section 106 planning obligations funds may be used for low carbon and renewable energy to mitigate impacts of development.

##### ***Housing policies H1, H5***

- 5C11.4.2 The London Plan requires the delivery of at least 11,950 additional dwelling in Lambeth from 2011-2021. This level of growth is likely to result in greenhouse gas emissions; however it is considered that emissions can be mitigated through energy efficient design and construction (including Code for Sustainable Homes) and patterns of development that reduce the need of private vehicle transport. As previously mentioned, there should be a presumption in favour of dual aspect dwellings and a presumption against north facing dwellings. This may be addressed in forthcoming revision of Sustainable Design and Construction SPD.

##### ***Economic development policy ED1***

- 5C11.4.3 Policy ED1 states that Key Industrial Business Areas (KIBAs) may only be used for business, industrial, storage and waste management uses, including green industries which contribute to achieving a low carbon economy or renewable technologies. There are currently 27 KIBAs in the Borough, as well as other sites outside of designated KIBAs in business use. While industry is a large contributor of carbon emissions (around 39% of all emissions), proliferation of green industries in the Boroughs KIBAs will help combat climate change and emissions from all activities (residential, transport, commercial).
- 5C11.4.4 The economic development policies (ED1 – ED6) generally seek to retain employment generating sites, and create new jobs and commercial activities in the Borough. While such growth is likely to contribute to greenhouse gas emissions,

there are policies within the draft Local Plan that seek to mitigate effects. In addition, areas earmarked for increased economic activity, such as Vauxhall, Waterloo encourage mixed use development and are located near to existing major public transport hubs, thereby reducing the likelihood of private vehicle use and the need to travel. Business use sites outside of KIBAs also allow for mixed use developments, and redevelopment to solely residential use is permitted subject to criteria related to marketing. Again, it is considered that new residential developments should be accessible to public transport and social infrastructure in order to reduce carbon emissions associated with private vehicle transport.

- 5C11.4.5 Positive social and economic effects such as improved health and well-being, reduced inequalities, prosperity and wealth, sense of belonging and community identity need to be weighed against increases in emissions, taking into account measures that seek to reduce the amount of emissions. Therefore, effects need to be considered holistically.

**Reasonable Alternatives (RAs)**

*The RAs identified for policy ED1 KIBAs included not having any KIBAs; allowing schools in KIBAs; allowing housing in KIBAs; and retaining KIBAs but reviewing boundaries based on the Employment Land Review and removing the exception of schools (as permitted by UDP). In terms of climate change and energy; losing all or many KIBAs may result in lower carbon emissions in the Borough but it would depend on the replacement land use of the KIBA. Domestic emissions account for a large percentage of emissions in the Borough (around 41%). Any loss of KIBAs and any associated reduction in carbon emissions needs to be weighed against the benefits of employment generating land in the Borough to both the Borough and wider London economy, and health and wellbeing of residents.*

*Allowing housing in KIBAs gives rise to conflicts in amenities / reverse sensitivity issues / bad neighbour uses which may have adverse impacts on residents' health. Domestic emissions currently contribute the largest amount of emissions of all sectors. Allowing schools in KIBAs may result in fewer emissions than business or industrial operations on the site, although the reduction is considered to be de minimus, particularly when weighed against the adverse effects of allowing schools in KIBAs (on employment and health and accessibility for example).*

**Transport policies T1 – T8**

- 5C11.4.6 The transport policies seek to promote sustainable travel, particularly active travel through improving environments for walking and cycling. Policy T1 states the Council promotes sustainable patterns of development, minimising the need to travel and reducing dependence on the private car. If implemented rigorously and consistently clause (a) of policy T1 may address the concerns highlighted above for new housing to be located in sustainable locations (near public transport and everyday services and facilities). With reference to reducing carbon emissions, it is considered that electric charging points should be encouraged in new developments, and therefore electric vehicles could feature in the road user hierarchy outlined in policy T1(b).

- 5C11.4.7 Overall, it is considered that the transport policies should result in significant positive effects on the achievement of SA Objective 11 in terms of reducing and managing emissions arising from transportation, given the level of growth required in the Borough, particularly London Plan obligations associated with housing and Opportunity Areas.

**Environment policies EN1 – EN5**

- 5C11.4.8 The draft Local Plan contains good policy on protecting open spaces and providing additional public open space provision in areas deficient of open space. Green spaces help remove carbon dioxide from the atmosphere, and therefore, provided the management of green spaces does not create carbon that exceeds the level vegetation can remove; the protection and enhancement of open spaces in terms of

reducing heat island effect and reducing impacts of climate change is commendable. Previous recommendations for policy EN1 Open Space, made in appraisals against SA Objectives 3, 4, 8 and 10 are further endorsed against SA Objective 11.

5C11.4.9 Policy EN2 on food growing areas also contribute positive effects to SA Objective 11 and recommendation 26 on encouraging food growing in non-residential use spaces is also further endorsed.

5C11.4.10 A significant policy in the attainment of SA Objective 11 is Policy EN3 on low carbon and renewable energy. The policy seeks to meet London Plan requirements and is not more ambitious in its approach to reduce carbon emissions or promote renewable technologies. It is considered that clause (a) of the policy should include the words 'as a minimum' as follows:

'All major development proposals will be expected to demonstrate in a detailed energy assessment that, *as a minimum*, carbon dioxide emission reduction targets have been met within the framework of the London Plan energy hierarchy.

Alternatively, it is recommended that the word 'exceeded' should replace the word 'met' in the current draft policy.

5C11.4.11 The policy team may also wish to review the policy wording in terms of delivering carbon dioxide emission reductions. For example, it is noted that clause (a) need only require demonstration through a energy assessment that carbon emission targets have been met, and no where in the policy does it mention that carbon reduction targets need be delivered. As a minimum, clause (e) on monitoring could be strengthened to ensure renewable and low carbon measures outlined in the energy assessment are being delivered and monitored. Alternatively clause (a) could be reworded to accommodate the expectation of delivery of carbon emission reductions. The policy team may wish to consider the following wording:

'(a) All major development proposals will be expected to deliver and exceed carbon dioxide emission reduction targets. A detailed energy assessment should be submitted that outlines how the targets will be met within the framework of the London Plan energy hierarchy. The assessment should also demonstrate how ongoing management will allow occupants to continually reduce their carbon emissions.

(e) To ensure that the Council can properly monitor the effectiveness of renewable and low carbon energy measures as demonstrated in the energy assessment, major developments will be expected to install appropriate equipment for post construction monitoring.'

5C11.4.12 In light of any possible amendment to clause (a) as highlighted above, clause (c) will also need amending.

5C11.4.13 Such amendments will result in greater carbon reductions and more positive effects on SA Objective 11 but also recognise that green technology and sustainable design and construction is a rapidly evolving field and in the plan period, it is likely the costs associated with green technologies will reduce, particularly as more zero-carbon developments are delivered in line with Government policy. There is some uncertainty in the delivery of district heat networks, particularly in identifying Energy Centres, for example in the Vauxhall Opportunity Area northern cluster.

5C11.4.14 Policy EN4 provides for sustainable design and construction, and previous recommendations associated with Code for Sustainable Homes and BREEAM are



further endorsed with regards to SA Objective 11. The policy also states that all development proposals should incorporate living roofs and walls where feasible and appropriate to the character and context of the development. As previously mentioned, it is unclear when a living wall or roof would not be appropriate to the character and context of the development. Even in conservation areas, it is considered that living roofs and walls should be incorporated, unless doing so undermines the heritage status or materials of the building.

5C11.4.15 A layer of vegetation can reduce heat loss from buildings, cutting the wind chill factor by 75 per cent and heating demand by 25 per cent (Cambridge University 2012). Living walls and green roofs provide environmental benefits which can save money in heating and cooling costs and minimise energy consumption, while extending the lifespan of roof membranes and heating, ventilation and air conditioning equipment. Living roofs and walls contribute to carbon sequestration, and are also effective climate change adaptation measures which are required under clause (d) of the policy. Accordingly in terms in SA Objective 11, it is considered that living roofs and walls should be provided in all development proposals.

5C11.4.16 Overall, and taking into account the level of growth proposed for the Borough, it is considered that policy EN4 should result in positive effects in terms of minimising energy consumption, reducing greenhouse gases and preparing the Borough for the unavoidable effects of climate change. The achievement of significant positive effects from policy EN4 is dependent on deliverability of energy efficient design and construction (i.e. low U-values and air permeability rates), low carbon technology and the extent of adaptation measures implemented, and would likely vary from one scheme to another. Detailed guidance will be provided in an updated SPD for Sustainable Design and Construction, which should help maximise positive effects.

5C11.4.17 It is considered that policy EN5 on flood risk appropriately addresses and minimises effects on developments of flood risk, including impacts arising from future climate change.

**Recommendation 144:** That policy EN3 is amended as follows:

‘(a) All major development proposals will be expected to deliver and exceed carbon dioxide emission reduction targets. A detailed energy assessment should be submitted that outlines how the targets will be met within the framework of the London Plan energy hierarchy. The assessment should also demonstrate how ongoing management will allow occupants to continually reduce their carbon emissions.

(e) To ensure that the Council can properly monitor the effectiveness of renewable and low carbon energy measures as demonstrated in the energy assessment, major developments will be expected to install appropriate equipment for post construction monitoring.’

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing. It is considered this would be a lost opportunity with regards to SA Objective 11. Any increase in green space help reduce effects of climate change. The RA identified for policy EN3 is to provide Lambeth specific targets. However this was dismissed as there is no evidence base to support local targets. No RAs have been identified for policies EN1 and EN4.*

**Quality of built environment policies Q10, Q11, Q15, Q21, Q23**

5C11.4.18 Recommendations 97 and 99 made on policies Q10 and Q11 for permeable surfaces and net increases in trees and biodiversity are further supported with respect to SA

Objective 11. Provided the recommendations are adopted (including those proposed for policy Q15), it is considered that the policies should result in positive effects on reducing greenhouse gases and provision of climate change adaptation measures.

5C11.4.19 Achieving improved energy efficiency in listed buildings and within conservation areas may be challenging and costly. Certain types of glazing, solid wall insulation and low and zero carbon micro-generation technologies may be less suitable or more expensive to install. Paragraph 10.73 of the supporting text to policy Q21 states that glazing for window replacements of listed building should be single glazing with a putty finish in the traditional manner. This will likely limit the extent of energy efficiency achievable in such buildings. However, it is equally incorrect to assume that the older a building is the less energy efficient it is. Many historic buildings perform well in terms of energy efficiency. Thick walls and small windows of many vernacular buildings provide them with a high thermal mass that keeps them warmer in winter and cooler in summer, while terraces can be more energy-efficient than some detached houses because of their smaller surface area. In a hotter climate, the natural ventilation, high ceilings and generous proportions of many historic buildings may also make energy-intensive air conditioning less necessary than in more recent structures (English Heritage 2008).

5C11.4.20 Similarly, it should be acknowledged that historic buildings represent a significant past investment of energy and materials. Demolition and replacement means not only losing all of the resources embodied in the original buildings, but also the investment of yet more energy for demolition, the creation and delivery of new construction materials, the building process itself, and the disposal of the consequential waste, resulting in increased carbon emissions and quantities of waste.

5C11.4.21 To increase energy efficiency of heritage assets it may be appropriate for heritage assets to link to district network schemes as this could alleviate some of the need for more immediate impacts on heritage assets such as the installation of micro-renewable technologies. The protection of settings of listed buildings (often generous green spaces) also provides climate change mitigation and adaptation responses.

5C11.4.22 It is recommended that guidance on climate change mitigation and adaptation in relation to heritage assets is provided in the proposed SPD for listed buildings and there is at least reference to this and climate change in the supporting text of heritage policies.

***Places and neighbourhoods policies***

5C11.4.23 The policy for Waterloo includes further development that supports its role as an international centre, major location for its London wide role for offices, hotels etc and its role for the local and wider economy. A new district centre is proposed for Vauxhall and significant growth is earmarked for the area. Given the level of growth proposed, and taking into account this area forms part of the Vauxhall, Nine Elms and Battersea Opportunity Area, it is considered that a district heat network should be provided (consistent with the Vauxhall Nine Elms Energy Masterplan). Indeed this is maintained in supporting text paragraph 11.6; however, policy PN2 does not necessarily commit to this. CHP/CCHP plant heating networks are proposed for Brixton which should result in reduced energy consumption, reduced levels of fuel poverty and increased energy efficiency.

5C11.4.24 Such development as that proposed under policies PN1 – PN4 and PN 8 will inevitably result in increased energy consumption and greenhouse gas emissions. However, increases in greenhouse gas emissions associated with growth need to be

weighed and considered against the social and economic benefits that such growth brings to the Borough. Positively, much significant development in the Borough is proposed within existing town centres which promote mixed use development, aim to reduce the need to travel, and maximise and enhance public transport accessibility and environments for active travel. The policy for Stockwell specifically makes provision for reducing carbon emissions and adapting to climate change, and local energy efficiency initiatives will be sought for developments in Loughborough Junction. Policy PN8 for West Norwood Town Centre seeks to secure opportunities for the provision of a CCHP local energy network. Consideration of energy is required by other Local Plan policies anyway (EN3, EN4) however by specifically making mention of climate change in some PN policies and not others; it may inadvertently suggest that energy networks are more appropriate or favoured in some areas over others (and consequently that these other areas may not need to consider low carbon technologies / energy networks).

5C11.4.25 As previously highlighted as an area of concern; policies PN4 Streatham and PN8 West Norwood / Tulse Hill seek car parking appropriate to the nature and scale of development. This will likely encourage car use and result in increased carbon emissions and therefore be contrary to SA Objective 11.

5C11.4.26 The Council may wish to seek higher sustainable design and construction standards in strategic sites (e.g. Vauxhall) particularly where district heating networks are proposed or where significant development is occurring unless it can be demonstrated it would not be technically feasible or financially viable to achieve the higher standards.

**Recommendation 145:** That policy PN2 is strengthened to ensure a district heating network is delivered in Vauxhall/or at least make reference to the Energy Masterplan for VNEB.

**Recommendation 146:** That the policy team review the necessity of referring to carbon emission reductions and climate change adaptation for some areas and not others.

## 5C11.5 Assessment of Sites

### Likely significant effects of implementing Site Allocations, taking into account mitigation

5C11.5.1 All sites in Table 42 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 11.

**Table 41: Significance criteria for SA Objective 11: Climate Change and Energy**

Positive	Negative
<ul style="list-style-type: none"> <li>• Contributes to 'low carbon living' or promotes opportunities for retrofitting.</li> <li>• Reduces carbon and other GHG emissions.</li> <li>• Promotes high standards of sustainable design and construction, including opportunities for linked trips.</li> <li>• Promotes renewable energy generation and use.</li> <li>• Promotes decentralised energy.</li> <li>• Addresses climate change adaptation issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased carbon and other GHG emissions result from:                             <ul style="list-style-type: none"> <li>• Increased traffic and transport;</li> <li>• Increased housing and built development</li> <li>• Industry</li> </ul> </li> <li>• <b>IF</b> measures not included to reduce and minimise emissions and use appropriate methods of low carbon construction, design and operation.</li> <li>• Fails to address or potentially worsens risk from climate change events.</li> </ul>

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**TABLE 42: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 11: CLIMATE CHANGE**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)		<ul style="list-style-type: none"> <li>- Increased housing and new build development proposed, therefore increased carbon emissions and GHG emissions</li> <li>- carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles</li> </ul>	- compliance with draft Local Plan policies, in particular EN3 and EN4
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2		<ul style="list-style-type: none"> <li>- new build development for new school, therefore increased carbon emissions and GHG emissions</li> <li>- potential increase in emissions and air quality issues from vehicles associated with school drop off and pick up</li> <li>- carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles</li> </ul>	- compliance with draft Local Plan policies, in particular EN3 and EN4
3	Vale Street Depot, Vale Street SE27		<ul style="list-style-type: none"> <li>- new build development for new school, or housing therefore increased carbon emissions and GHG emissions</li> <li>- potential increase in emissions and air quality issues from vehicles associated with school drop off and pick up</li> <li>- carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles</li> </ul>	- compliance with draft Local Plan policies, in particular EN3 and EN4
4	Elizabeth House, York Road SE1	- improvements to public realm to encourage walking and access to Waterloo Station	<ul style="list-style-type: none"> <li>- new build development including offices and residential resulting in increased carbon emissions and GHG emissions</li> <li>- carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles</li> </ul>	- compliance with draft Local Plan policies, in particular EN3 and EN4
5	Shell Centre, 2-8 York Road SE1	- improvements to public realm to encourage walking and access to	- new build development including mixed use development (offices, leisure,	- compliance with draft Local Plan policies, in particular EN3 and EN4

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		Waterloo Station	residential) resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles	
6	Waterloo Station, Waterloo Road SE1	- opportunity for retrofitting - increases public transport capacity and accessibility / interchanges - improvements to encourage more waling	- carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - new build potential would increase carbon emissions and GHG emissions	- compliance with draft Local Plan policies, in particular EN3 and EN4
7	Cornwall Road Bus Garage, Cornwall Road SE1	- improvements for cyclists and pedestrians	- new build development including offices and residential resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles	- compliance with draft Local Plan policies, in particular EN3 and EN4
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	- opportunity for retrofitting	- carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles	- compliance with draft Local Plan policies, in particular EN3 and EN4
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	- dual aspect residential units in blocks - public realm improvements for cyclists and pedestrians	- new build development for new school, and mixed use development (residential and employment) therefore increased carbon emissions and GHG emissions - potential increase in emissions and air quality issues from vehicles associated with school drop off and pick up - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles	- compliance with draft Local Plan policies, in particular EN3 and EN4
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	- retains listed building fronting Wandsworth Road – possible opportunity for refurbishment - dual aspect residential units in blocks - public realm improvements for cyclists	- new build mixed use development including employment, community and residential resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate	- compliance with draft Local Plan policies, in particular EN3 and EN4

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		and pedestrians	change adaptation measures not provided as key development consideration and design principles	
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	- public realm improvements for cyclists and pedestrians	- new build mixed use development including employment, community and residential resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles	- compliance with draft Local Plan policies, in particular EN3 and EN4
12	Somerleyton Road SW9	- retention of line of plane trees on grass verge - possible opportunity for refurbishment of Carlton Mansions - new dwellings to be dual aspect	- new build mixed use development including employment, community and residential resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - provision of new open space – unclear if this will be green	- compliance with draft Local Plan policies, in particular EN3 and EN4 - Brixton policy PN3 seeks to implement town centre energy and waste management strategies including CHP/CCHP plant heating networks
13	Popes Road SW9	- dual aspect residential units	- new build mixed use development including employment, community and residential and cycle and car parking resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - promotes increased traffic (car parking)	- compliance with draft Local Plan policies, in particular EN3 and EN4 - Brixton policy PN3 seeks to implement town centre energy and waste management strategies including CHP/CCHP plant heating networks
14	Brixton Central (between the viaducts) SW9		- carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - new development increases carbon emissions and GHG emissions	- compliance with draft Local Plan policies, in particular EN3 and EN4 - Brixton policy PN3 seeks to implement town centre energy and waste management strategies including CHP/CCHP plant heating networks
15	SW2 Enterprise Centre	- opportunity for refurbishment	- new build mixed use development	- compliance with draft Local Plan

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			including civic, employment, community and residential resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - provision of new open space – unclear if this will be green	policies, in particular EN3 and EN4 - Brixton policy PN3 seeks to implement town centre energy and waste management strategies including CHP/CCHP plant heating networks
16	260 – 367 Norwood Road SE27	- makes provision for a CCHP local energy network within the development therefore promotes low carbon living, and reduces carbon emissions	- new build mixed use development including supermarket, community and residential, business and car parking resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - promotes increased traffic (car parking)	- compliance with draft Local Plan policies, in particular EN3 and EN4

**Recommendation 147:** where places and neighbourhoods policies encourage or seek provision of district heating networks (for example Brixton, Vauxhall, West Norwood) it is recommended that site allocations within these areas also recognise this and expect development to link or create such heating networks/ accommodate the necessary Energy Centre.

**Recommendation 148:** taking into account the level of development proposed for each site, it is recommended that the policy team outline specific low carbon technologies and climate change mitigation and adaption measures that will be expected as part of the site allocation. The quantum of development proposed represents a significant opportunity to increase energy performance of each area (particularly major centres), and it is therefore important to maximise opportunities by ensuring the energy performance of new development is of the highest standard. For example, all mixed use developments should incorporate use of CHP as a minimum and ideally be part of a wider district heating network. There should also be guidance for each site on the amount and type of landscaping and green open space expected. Living roofs and walls should be expected on appropriate sites.

## 5C11.6 Summary of Local Plan policies and site allocations

5C11.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, and the housing growth requirements on the Borough set out in the London Plan, it is possible that the Local Plan could have a positive effect on reducing greenhouse gas emissions relative to the growth imposed, and there are likely to be improvements to the Borough's ability to adapt to climate change.

**Table 43: Summary assessment of effects of draft Local Plan on climate change**

Assessment of effects of the Local Plan on SA objective 11	Score without recommendations	Score with recommendations	Justification of Score	Timescale and probability	Permanent or temporary
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>Increases in greenhouse gas emissions associated with the levels of growth projected for the Borough need to be weighed and considered against the social and economic benefits that growth brings to the Borough. Given that the London Plan requires the Borough to accommodate significant levels of housing growth, it is considered that to some extent, some increase in associated greenhouse gas emissions might need to be accepted.</p> <p>However, the level of emissions should be managed. In this respect it is considered that the policies generally seek to reduce emissions. Uncertainties lie with the delivery of district heat networks, and the level of obligation on developers (and indeed feasibility) to exceed carbon reduction targets, without adversely affecting developer interest in the Borough. Uncertainty also arises from delivery of high Code for Sustainable Homes and BREEAM standards as such standards are only required unless it is not technically feasible or viable to do so. However, from 2013 – 2016 buildings will need to achieve 40% reductions in CO2 emissions on building regulations in line with London Plan.</p> <p>It is positive that the Local Plan generally encourages sustainable patterns of urban development which actively seek to reduce reliance of the private motor car. It is considered that adaptation to climate change is provided for in policies. Living roofs and walls are considered a critical component of adaptation measures.</p> <p>A significant portion of the Boroughs emissions come from housing, and the delivery of new housing is a Local Plan and London Plan priority. Provided developments are delivered in a sustainable manner that reduces the need to travel, and buildings (new and existing) are more energy efficient in design and construction (reducing fuel poverty), and district heating networks are delivered; it is considered that the necessary growth can be achieved in a way that minimises energy consumption, in so far as possible.</p>	The impact of reduced greenhouse gas emissions will be achieved over the long-term. The probability of this occurring is dependent on the delivery of an public transport improvements, delivery of sustainable building and design standards (i.e. high Code for Sustainable Homes and BREEAM standards); delivery of district heating networks and other developments being linked into them and the and the technical and financial viability of installing small scale renewable energy or low carbon technologies. In the short –term, particularly as the economy recovers from the recession, developers may claim that high sustainability standards are not technically feasible or viable.	<p>Temporary increases in emissions may result as a consequence of demolition and construction</p> <p>In other respects effects of reduced greenhouse gas emissions are considered to be permanent with respect to regulated emissions given the number of Draft Local Plan policies that either directly or indirectly seek to reduce greenhouse gas emissions.</p>

## 5C11.7 Recommendations for monitoring likely uncertain effects

5C11.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Number of buildings built to Code for Sustainable Homes Level 4 and BREEAM excellent
- Number of DHNs in the Borough and dwellings/premises linked to them.



## 5C12. WATER RESOURCES AND FLOOD RISK MANAGEMENT

5C12.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

Objective 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.

5C12.0.2 To achieve this objective, plan policies should improve the quality of water and waterbodies; reduce piped water consumption e.g. through reducing demand and encouraging recycling in households; reduce waste water and sewage needing processing; support sustainable urban drainage and; 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.

### 5C12.1 Relevant policy objectives

#### National Level

5C12.1.1 Paragraphs 100 – 104 of the *National Planning Policy Framework 2012* relate to flood risk. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should apply a sequential, risk-based approach to the location of development to avoid possible flood risk to people and property and manage any residual risk.

#### Regional Level

5C12.1.2 *London Regional Flood Risk Appraisal – October 2009* recognises that some Opportunity Areas and Intensification Areas are within known flood zones, and that alternative sites for large scale development within London do not exist without encroaching into Green Belt, MOL or other protected spaces. To meet housing targets, consideration will need to be given to development of brownfield flood zone 3a. The sequential test permits the consideration of these sites for development. It will still be necessary for boroughs and developers to apply the sequential test locally and consider flood risk assessments at a more detailed level when allocating uses or applying for planning permission. It will still remain important to place more vulnerable uses in areas with lower flood risk in order to meet the Sequential Test at a local level.

5C12.1.3 *London Plan (2011)* policy 5.12 addresses flood risk management. The policy requires flood risk assessment and management requirements as set out in PPS 25, and development should have regard to TE2100 and catchment management plans. Policies 5.13 to 5.15 address matters such as sustainable urban drainage systems (including a drainage hierarchy), water quality and wastewater infrastructure, and water use and supplies.

5C12.1.4 *Thames Estuary 2100 (TE2100)* is a long term flood risk management plan for London and the Thames estuary. It sets out the strategic direction for managing flood risk in discrete policy areas across the estuary, and contains recommendations on what actions the Environment Agency and others will need to take in the short (next 25 years), medium (the following 40 years) and long term (to the end of the century). Lambeth falls within Action Zone 2 – Central London, of the TE2100 Action Plan.

## **5C12.2 Baseline conditions and existing issues**

### *Fluvial flooding*

- 5C12.2.1 The key main rivers within Lambeth Borough are:
- River Thames;
  - River Graveney; and
  - River Effra
- 5C12.2.2 The tidal River Thames runs along the northern boundary of The London Borough of Lambeth from Nine Elms and Vauxhall in the west to the Oxo Tower in the east. The 3.2km frontage is actively defended by raised embankments and hard defences that protect Lambeth from large scale flood events.
- 5C12.2.3 The tidal limit of the River Thames is situated at Teddington Weir approximately 15km upstream of Lambeth. The Borough is therefore potentially at risk from both fluvial and tidal flooding from the Thames.
- 5C12.2.4 A 1km stretch of the River Graveney, a tributary to the River Wandle runs through the Streatham / Norbury area to the southern extent of the Borough, joining the Wandle at South Wimbledon. The source of the River Graveney is located in the vicinity of Selhurst and the upper reaches are often referred to as the Norbury Brook. The watercourse is canalised throughout Lambeth.
- 5C12.2.5 The EA have provided details of flooding instances on the Graveney from their flood records database for the years; 1968, 1973, 1977,1978,1981,1983 and 1987.
- 5C12.2.6 The River Effra flows entirely underground. It rises to the south of Lambeth near Crystal Palace, and flows in a northerly direction through Norwood Cemetery, Dulwich, Herne Hill, Brockwell Park, Brixton, Kennington to flow out into the Thames by Vauxhall Bridge.
- 5C12.2.7 Historical anecdotal evidence suggests that the watercourse flooded during heavy rains every decade or so, with records of flooding in July 1890, June 1914 and again in June 2007. Flooding was recorded along its path in the Elder Road/Chestnut Road area of West Norwood.
- 5C12.2.8 The Environment Agency has provided a Flood Map for Lambeth (Figure 7). The Flood Map shows the estimated extent of Flood Zones 2 (area with a 1 in 1000 or greater annual probability of flooding) and Flood Zone 3 (area with an annual probability of less than or equal to 1 in 100 fluvial flood risk or 1 in 200 tidal flood risk) (ignoring the presence of flood defences) for all main rivers and/or watercourses with identified critical drainage problems. The Flood Map gives a good indication of the areas at risk of flooding within the Borough however; it does not provide detail on individual properties.

### *Sewer flooding*

- 5C12.2.9 A large network of sewers is located in Lambeth. Modern sewer systems are typically designed to accommodate rainfall events with a 1 in 30 year return period. Older sewer systems were often constructed without consideration of a design standard therefore some areas of the London Borough of Lambeth may be served by Victorian sewers with an effective design standard of less than 1 in 30 years. Much of the London sewer network is a combined system with storm and foul drainage served by a single sewer. As a result sewer flooding events where they occur can often be frequent, although the scale of consequence is generally small.

*Surface water flooding*

5C12.2.10 While there are no specific surface water flooding records, local knowledge has suggested that Dulwich Road in South Brixton has known instances of basement flooding, as has Dalmore Road in West Norwood and a school located on Stockport Road in Streatham Vale.

*Groundwater flooding*

5C12.2.11 There is limited information regarding historical instances of groundwater flooding. Local knowledge provided by Lambeth has noted that instances of groundwater flooding have been reported on Ferndene Road adjacent to Ruskin Park in Central Brixton and Dulwich Road adjacent to Brockwell Park. This data should be used with caution as it is anecdotal and may not be solely caused by groundwater flooding, surface water and/or overland flow may also be contributing.

There are two reservoirs located in the Borough, the first at Brixton Hill on Waterworks Road and the second on Wavetree Road.

5C12.2.12 London has reasonable high levels of rainfall, but the density of population means that water usage is also going to be increasingly important in the future. The south east of England is an area of serious water stress and water efficiency measures will be essential to support new growth in the Borough. Lambeth is within the London Resource Zone. Average household water consumption for Lambeth in 2010/11 was 166.5 litres per person per day (Environment Agency 2012).

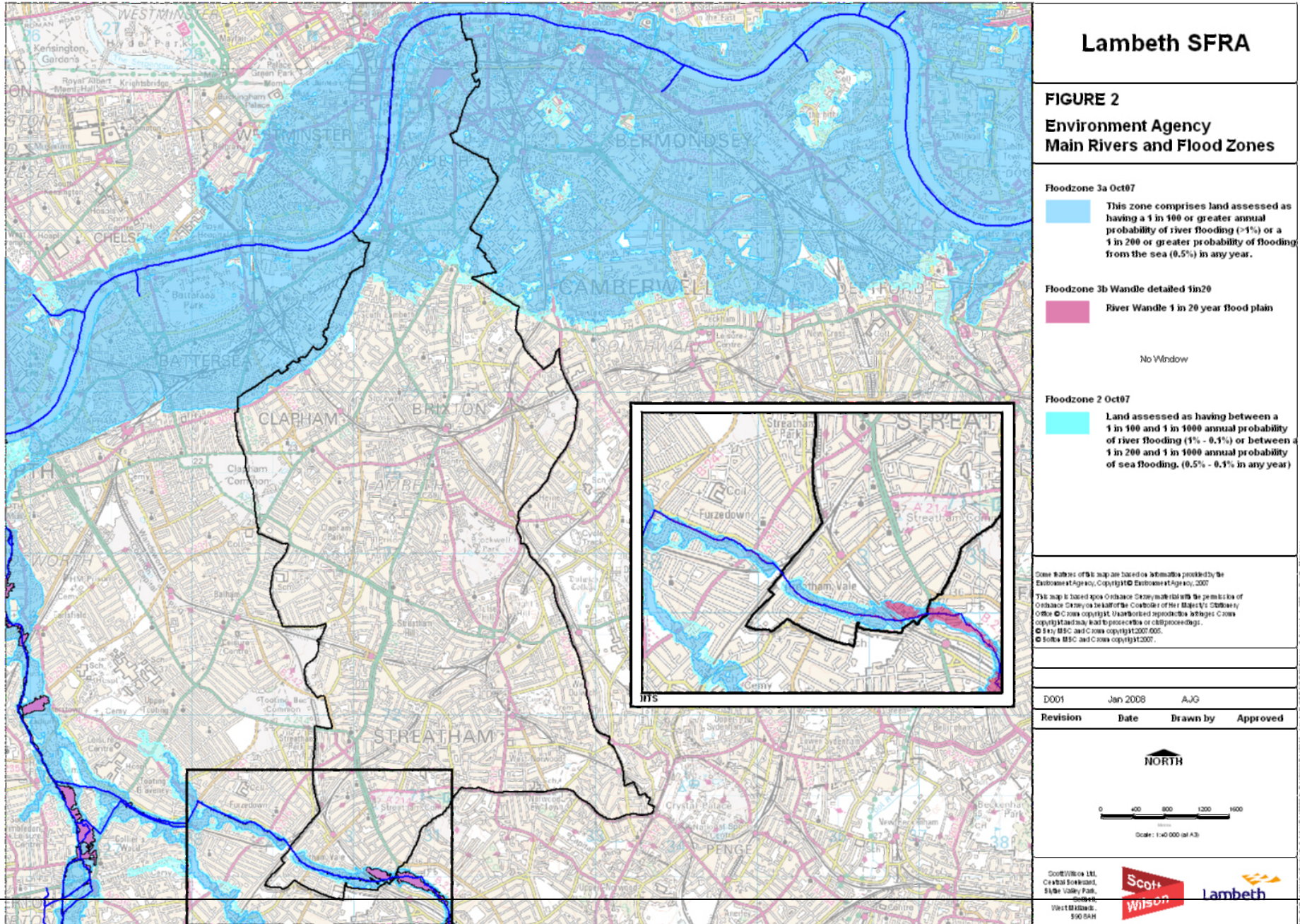
5C12.2.13 There were no major (category 1) or significant (category 2) water pollution incidents in Lambeth between 2005 and 2010 however; there were eight minor incidents, resulting from fires, containment and control failures and authorised activity (storm sewage discharge).

**5C12.3 Likely evolution without the Plan**

5C12.3.1 In the absence of the Draft Local Plan the Council will need to rely on the provisions in the Core Strategy and London Plan. Water supply issues may be less appropriately managed in new developments; the uptake of sustainable urban drainage systems may be lower, and development may not appropriately reflect local flood risks in the Borough.



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## 5C12.4 Assessment of Policies

### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

5C12.4.1 The main policies relevant to achievement of the SA Objective are:

D1 – Delivery and monitoring	Q10 – Landscaping
D2 – Presumption in favour of sustainable development	Q15 – Development in gardens
D3 – Infrastructure	Q27 – Tall buildings
D4 – Planning obligations	PN1 – Waterloo
H1 – Maximising housing delivery	PN2 – Vauxhall
T5 – River transport	PN3 – Brixton
T7 – Parking	PN4 – Streatham
T10 - Telecommunications	PN5 – Clapham
EN1 – Open space	PN6 – Stockwell
EN4 – Sustainable design and construction	PN7 – Oval
EN5 – Flood risk	PN8 – West Norwood / Tulse Hill
EN6 – Sustainable drainage systems and water management	PN9 – Herne Hill
	PN10 Loughborough Junction

#### ***Delivery and Monitoring policies D1 – D4***

5C12.4.2 The above policies seek to work with partners on delivering infrastructure and includes water and flood management infrastructure that will result in improved quality of water and water bodies such as Thames Tunnel, and improvement works for the River Graveney including flood storage and riparian bank improvements.

#### ***Housing policy H1***

5C12.4.3 A significant number of new dwellings (at least 11,950 pa) are proposed for delivery in the Borough. Where located in identified flood zones, the design of housing will need to provide for flood risk, and policy EN5 Flood Risk seeks to mitigate possible adverse effects. Large scale new development, such as that proposed for Vauxhall, provides significant opportunity to incorporate flood resilient design and appropriate design to mitigate surface water run-off. All dwellings will need to be built to a minimum of Code for Sustainable Homes Level 4, which should also incorporate water management features in housing design.

#### ***Transport policies T5, T7, T10***

5C12.4.4 Transport policies seek to discourage private vehicle journeys and encourage more sustainable forms of travel including walking, cycling and public transport. By discouraging private vehicles and encouraging car-free developments; better water quality can result from reduced contaminants in surface water run-off from roads. Similarly, permeable parking surfaces provide areas of land where water can infiltrate into the ground reducing runoff rates and discharges into wastewater network. Policy T5 on river transport ensures that any new pier or improvement to an existing pier will not have an adverse impact on the flood defences of the Thames. Telecommunications should not be located in areas or in a way that exposes it to flood damage.

**Recommendation 174:** That telecommunications are not sited in a way that makes them vulnerable to flood damage.

#### ***Environment policies EN1, EN4 – EN6***

5C12.4.5 Open spaces can also act as flood storage areas, reducing the amount of surface water flooding and runoff by allowing infiltration of water into the ground. It is



considered that policy EN1 supports sustainable urban drainage systems, improves the quality of surface waters and groundwater and minimises flood risk and will therefore result in positive effects on the attainment of SA Objective 12.

- 5C12.4.6 Policy EN4 seeks sustainable design and construction of all developments, including residential (Code for Sustainable Homes), non-residential (BREEAM) and construction of the public realm. The CSH and BREEAM tools contain standards for water consumption and surface water run-off. The policy supports living walls and roofs. Previous recommendations 35 and 58 identified in appraisals against SA objectives 2, 4, 6, 8, 10 are further supported with regards to achieving SA Objective 12.
- 5C12.4.7 Policy EN5 is on the management of flood risk for the Borough whereby the impact of flood will need to be minimised and the outcomes of the SFRA respected. Areas identified as at highest risk of fluvial and tidal flooding are Waterloo, Vauxhall and adjacent to the River Graveney. The policy also states that development should be steered towards areas of lowest flood risk. However, significant development is proposed in the London Plan (and subsequently in the Local Plan), for the Waterloo and Vauxhall Opportunity Areas. Implementation of policy EN5 should help to manage and reduce flood risk as much as possible, and adverse effects associated with flood risk will need to be weighed against the economic and social benefits that development brings in these areas. Recommendation 59 on maintenance of flood defences made in the appraisal against SA Objective 4 is further endorsed for SA Objective 12.
- 5C12.4.8 Taking into account the level of growth proposed under the Local Plan for the Borough, it is considered that policy EN6 on sustainable drainage systems and water management, together with policy EN5, should be effective in improving the quality of surface waters and groundwater, the wise management of water, and in minimising flood risk through ensuring appropriate flood storage capacity. However, the success of the policies is largely dependent on the extent and variety of water efficiency measures implemented, ambitiousness and commitment to conform to the policies and enforcement. Therefore effects are likely to be uncertain particularly in short term while development occurs, measures like SUDs are delivered and innovative approaches such as grey water recycling are more mainstream and costs decrease.
- Quality of built environment policies Q10, Q15, Q27**
- 5C12.4.9 As currently drafted policy Q10 does not provide for permeable surfaces for landscaping of developments. Landscaping can refer to both soft and hard landscaping. In line with recommendation 97, to avoid adverse effects on SA Objective 12 it is further recommended that policy Q10 contain provision for permeable materials in landscaping schemes. Recommendation 99 on achieving a net gain in biodiversity / vegetation / trees will also help reduce flood risk and achieve improved runoff management, and is therefore further supported with respect to SA Objective 12. Policy Q15 on development in gardens should reduce surface water runoff of sites.
- 5C12.4.10 Supporting text paragraph 10.95 identifies Vauxhall, Albert Embankment and Waterloo as locations appropriate for tall buildings. These areas are also known flood risk areas. Provided such buildings are designed to be flood resistant and resilient, it is considered that tall buildings in these locations may reduce flood risk to people and property above the flood level.

**Places and neighbourhoods policies PN1 – PN10**

- 5C12.4.11 The level of growth proposed is inevitably going to place increased stresses on the

water resource. However, the quantum of development proposed in the places and neighbourhoods policies will need to conform to other relevant policies on water and flood risk, particularly EN4, EN5 and EN6. Nonetheless the success of these policies is dependent upon implementation, ambitiousness sought by developer / encouraged by the Council, and enforcement. Policies PN1 and PN2 focus on areas that are within highest flood risk in the Borough, yet neither of the policies or supporting text reflect adequate recognition of this. It is recommended that policies PN1 and PN2 include provision of the flood risk. Recommendation 142 on encouraging living roofs and walls within specific places and neighbourhoods is further endorsed with respect to SA Objective 12.

5C12.4.12 All policies include public realm improvements. These should include where appropriate permeable surfaces, particularly where new public squares / spaces are created. It is recommended that the policy team review the policies in light of this.

**Recommendation 149:** That policies PN1 and PN2 include recognition of the identified flood risk for Waterloo and Vauxhall areas, and preferably any appropriate design guidance preferred for these areas.

**Recommendation 150:** That permeable surfaces provided for all appropriate public realm improvements / new square and public spaces for all places and neighbourhoods policies.

**Reasonable Alternatives RAs**

*No RAs have been identified for the policies above*

**5C12.5 Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

5C12.5.1 All sites in Table 45 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 12.

**Table 44: Significance criteria for SA Objective 12: Water and Flood Risk**

Positive	Negative
<p>Encourages water conservation and prudent use.</p> <p>Site specific allocations:</p> <ul style="list-style-type: none"> <li>• no land contamination issues;</li> <li>• protects or improves water quality;</li> <li>• not adjacent to a watercourse.</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• doesn't impact upon flood risk area (flood zones 2 or 3)</li> <li>• not at risk of all types of flooding</li> <li>• SUDS is viable</li> <li>• Minor positive – if an element of off-site enhancement is offered.</li> </ul>	<p>Likely to exacerbate water consumption pressures in areas of water stress.</p> <p>Site specific allocations:</p> <ul style="list-style-type: none"> <li>• land contamination issues;</li> <li>• threat to water quality;</li> <li>• adjacent to a watercourse.</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• located in high flood risk area and likely to increase flood risk, or where SUDS is constrained.</li> </ul> <p>Minor negative</p> <ul style="list-style-type: none"> <li>• - if no off-site enhancement is offered by the site</li> </ul>

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**TABLE 45: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 12: WATER AND FLOOD RISK**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)		- site within flood zone 3 - Water supply and sewerage capacity may be under increased pressure from extra demand?	Compliance with draft Local Plan policies particularly EN4 – EN6
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	- site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course	- possible land contamination issues (former petrol station) - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
3	Vale Street Depot, Vale Street SE27	- site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course	- Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
4	Elizabeth House, York Road SE1		- site within flood zone 3 - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
5	Shell Centre, 2-8 York Road SE1		- site within flood zone 3 - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
6	Waterloo Station, Waterloo Road SE1		- site within flood zone 3 - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
7	Cornwall Road Bus Garage, Cornwall Road SE1		- site within flood zone 3 - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11		- site within flood zone 3 - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8		- site within flood zone 3 - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8		- site within flood zone 3 - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)		- site within flood zone 3 - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6



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12	Somerleyton Road SW9	- site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course	- possible land contamination issues (vehicle maintenance depot) - Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
13	Popes Road SW9	- site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course	- Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
14	Brixton Central (between the viaducts) SW9	- site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course	- potential to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
15	SW2 Enterprise Centre	- site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course	- Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6
16	260 – 367 Norwood Road SE27	- site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course	- Likely to exacerbate water consumption pressures	Compliance with draft Local Plan policies particularly EN4 – EN6

## 5C12.6 Summary of Local Plan policies and site allocations

5C12.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, projected population growth, and the housing targets assigned in the London Plan to be delivered in Lambeth; it is considered that the Local Plan policies seek to attain SA Objective 12.

**Table 46: Summary assessment of effects of draft Local Plan on water and flood risk**

Assessment of effects of the Local Plan on SA objective 12	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
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 considered that the Local Plan provides good policy framework for the management of water resources, and flood risk given the level of development proposed and population growth expected.</p> <p>Taking into account the level of growth proposed under the Local Plan for the Borough, it is considered that policy EN6 on sustainable drainage systems and water management, together with policy EN5, should be effective in improving the quality of surface waters and groundwater, the wise management of water, and in minimising flood risk through ensuring appropriate flood storage capacity. However, the success of the policies is largely dependent on the extent and variety of water efficiency measures implemented, ambitiousness, extent and commitment to comply with the policies and enforcement. Therefore effects are likely to be uncertain particularly in short term while development occurs, measures like SUDs are delivered and innovative approaches such as grey water recycling are more mainstream and costs decrease.</p> <p>Policy EN5 Flood Risk provides a realistic response in addressing flood risk while meeting London Plan housing targets and developing the Opportunity Areas identified in the London Plan. The policy also recognises the sequential and exception tests of the NPPF. Telecommunications should not be sited in a way that makes them vulnerable to flood damage.</p> <p>However, given that delivery of the Draft Local Plan proposes significant development in Opportunity Areas along the Thames; in order to reduce and manage flood risk, there will be great dependence on design, emergency planning and upgrade and maintenance of defence systems (the latter two outside the scope of LDF planning). Further development and intensification probably does not reduce risk, but design can mitigate flood effects should defences be breached (i.e. manages the flood risk) and therefore minimises flood risk.</p>	<p>All development in identified flood zones two and three is going to be subject to the sequential and exception tests. Flood risk assessments will be required at more local levels (site specific) therefore it is likely that flood risk will be managed through design, landuse, and emergency management procedures.</p> <p>It is likely that redevelopment of Opportunity Areas will commence in the short-term and be completed in the long-term. Delivery of SUDs and living roofs and walls will occur concurrently with development and therefore is unlikely to be evident until the mid to long term, particularly as such features become established.</p>	Permanent

			<p>Therefore, it is considered that the cumulative effects of attaining SA Objective 12 are largely dependent upon implementation. It is for this reason that effects are to some extent uncertain. Developments in Opportunity Areas need by of highest quality design, but this must also incorporate flood resilience.</p> <p>The design of new developments, including alterations to existing developments requires consideration of natural resources like water. Installation and incorporation of water efficiency measures are expected. However, delivery of water demand measures such as greywater recycling and rainwater harvesting is uncertain, particularly if it can be claimed as making developments unfeasible or unviable.</p>		
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**5C12.7 Recommendations for monitoring of uncertain effects**

5C12.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems

## 5C13. WASTE

5C13.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

Objective 13: Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.

5C13.0.2 To achieve this objective, plan policies should aim to 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; make waste avoidance, reuse and recycling easy for residents and visitors; help develop markets for recycled products by using them; enable safe storage of waste and recycling, convenient for both residents and collectors; and make appropriate provision for waste management facilities in the Borough to help meet the London Plan apportionment and self sufficiency targets.

### 5C13.1 Relevant policy objectives

#### National Level

5C13.1.1 *Planning Policy Statement 10 – Planning for Sustainable Waste Management (2011)* states that the Government’s overall objective on waste is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. The Government promotes sustainable waste management, moving the management of waste up the ‘waste hierarchy’ of reduction, reuse, recycling and composting, using waste as a source of energy, and only disposing as a last resort.

#### Regional Level

5C13.1.2 Policies 5.16 – 5.19 of the *London Plan (2011)* address waste and makes provision for zero waste to the landfill by 2031, reuse and reduction in the use of materials, exceeding recycling/composting levels and allocation of sufficient land / waste management facilities to meet waste apportionment targets.

### 5C13.2 Baseline conditions and existing issues

5C13.2.1 Lambeth is a Waste Planning Authority and a Waste Collection Authority. The Western Riverside Waste Authority (WRWA) is the Waste Disposal Authority for Lambeth, Wandsworth, Hammersmith and Fulham, and Kensington and Chelsea.

5C13.2.2 The tables below set out the quantity of municipal waste and the way in which it was managed, by management type, in 2011/12.

**Table 47: Local Authority Collected Municipal Waste (LACMW) 2011/12**

Source: Lambeth sustainable waste management service 2012

	Landfill	Incineration with EfW*	Recycled	Composted	Other (reused)	Total Waste Arisings
Amount of waste arisings in tonnes	16,724.02	76,635.59	22,428.36	3,079.18	182.02	119,049.18

\*Energy from Waste

**Table 48: Municipal Waste Management by Type**  
Source: Lambeth sustainable waste management service 2012

Total Municipal Waste	Management	Tonnes	%	Total Tonnes
2004/05	Recycling	14,564.04	9.36	155,653.99
	Composting	2,846.36	1.83	
	Energy Recovery	93.27	0.06	
	Disposal	138,150.3	88.75	
2005/06	Recycling	18,031.41	11.64	154,866.8
	Composting	4,418.34	2.85	
	Energy Recovery	92.89	0.06	
	Disposal	132,324.2	85.44	
2006/07	Recycling	19,694.03	12.77	154,237.51
	Composting	3,630.3	2.35	
	Energy Recovery	219.78	0.14	
	Disposal	13,0693.4	84.74	
2007/08	Recycling	22,026.41	15	151,224.03
	Composting	3,835.88	3	
	Energy Recovery	151.33	0.10	
	Disposal	125,210.41	82.80	
2008/09	Recycling	21,884.51	15.51	141,061.64
	Composting	3,282.17	2.33	
	Energy Recovery	90.42	0.06	
	Disposal	115,623.99	81.97	
2009/10	Recycling	21,608.87	16.52	130,815.97
	Composting	3,756.23	2.87	
	Energy Recovery	75.40	0.06	
	Disposal	105,218.98	80.43	
2010/11	Recycling	21,845.07	17.14	127,457.77
	Composting	3,508.64	2.75	
	Energy Recovery	48.10	0.04	
	Disposal	101,862.20	79.92	
2011/12	Recycling	22,428.36	18.84	119,049.18
	Reuse	182.02	0.15	
	Composting	3,079.18	2.59	
	Energy Recovery	76,635.59	64.37	
	Disposal	16,724.02	14.05	

- 5C13.2.3 The total amount of waste arising in Lambeth has continued to decrease periodically despite population numbers increasing. Table 48 shows that there has been steady reductions of total waste arising since 2004/5. In 2011/12 Lambeth produced 8,408 tonnes less waste than in 2010/11, and 36,605 tonnes less waste than in 2004/05. Table 48 also shows a general trend towards increased levels of recycling and composting and a reduction in disposal (i.e. landfill).
- 5C13.2.4 The council's recycling initiatives have been successful in seeing an increase in the total amount of recycling from 9.36% of municipal waste in 2004/05 to 17.14% in 2009/10.
- 5C13.2.5 The proportion of household waste that is recycled or composted has increased year on year from less than ten per cent in 2001/02 to almost 28 per cent in 2010/11.
- 5C13.2.6 There is currently a shortfall of 197,417 tonnes per annum between the capacity of existing waste sites in Lambeth and the London plan apportionment to 2031.

### 5C13.3 Likely evolution without the Plan

5C13.3.1 The Council will continue with its waste management procedures in the absence of the Local Plan. However, in the future, there may be insufficient land allocation for waste management facilities. While the London Plan provides guidance on site selection; actual sites in Lambeth are not identified. With projected population growth and additional dwellings, new development will need to incorporate appropriate waste management mechanisms such as composting facilities and use of recycled materials.

### 5C13.4 Assessment of Policies

#### **Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation**

5C13.4.1 The main policies relevant to achievement of the SA Objective are:

D1 – Delivery and monitoring	Q13 – Refuse/ recycling storage
D2 – Presumption in favour of sustainable development	Q21 – Statutory listed buildings
D3 – Infrastructure	Q23 – Conservation Areas
D4 – Planning obligations	Q25 – River Thames
H1 – Maximising housing delivery	PN1 – Waterloo
ED1 - KIBAs	PN2 – Vauxhall
ED3 – Large offices	PN3 – Brixton
ED12 – Visitor attractions, leisure, arts and culture uses	PN4 – Streatham
ED14 – Markets	PN5 – Clapham
T8 - Servicing	PN6 – Stockwell
EN4 – Sustainable design and construction	PN7 – Oval
EN7 – Sustainable waste management	PN8 – West Norwood / Tulse Hill
	PN9 - Herne Hill
	PN10 Loughborough Junction

#### ***Delivery and monitoring policies D1 – D4***

5C13.4.2 Use of vacant buildings as provided for in policy D1 is an effective way of minimising the production of waste associated with new construction. It results in positive effects in terms of reuse and recycling of materials. Policy D4 on planning obligations includes use of funds for provision of infrastructure, and some examples are provided. Waste is not included in the list under clause (b); however infrastructure is defined in the glossary in terms of green, physical and social. It is expected that waste would be included within this definition, and therefore is included within policy D4.

#### ***Housing***

5C13.4.3 Policy H1 seeks to maximise the supply of additional homes in Lambeth. London Plan policy requires at least 11950 net additional dwellings over the period 2011 – 2021 and Lambeth policy seeks to exceed this allocation. This will result in increased domestic waste. However, population growth is expected for the whole of London, and if some of the required housing is not accommodated in Lambeth, it will simply be accommodated elsewhere in London. Therefore, it is unlikely there will be any net decrease in regional domestic waste if the level of housing proposed for Lambeth under policy H1 does not go ahead. In addition, housing will need to be sustainably built to the Code for Sustainable Homes standard which includes waste provision in its assessment.

**Economic development policies ED1 – ED3, ED12, ED14**

- 5C13.4.4 The economic development policies of the draft Local Plan seek to stimulate economic growth in the Borough. Accordingly, such growth and development will likely produce additional commercial and business orientated waste. Waste will be generated from day to day operations of businesses, but also from initial set-up, especially if new buildings are required. Where possible, existing buildings should be retained and incorporated into the design of new development (BREEAM awards credits for this in their assessments as required by policy EN4).
- 5C13.4.5 Policy ED1 ensures there is land supply for waste management uses on sites known as KIBAs. KIBA sites are strictly only for use for business, industrial, storage and waste management uses, including green industries like recycling, refurbishing and repair. The policy therefore should result in positive effects on SA Objective 13 by ensuring safe storage of waste and recycling that is convenient for both residents and collectors. However, changes in permitted development rights from B1 to residential may result in loss of land in KIBA use which would have a detrimental effect /reduce options for sites for future waste management use. Sites outside of KIBAs currently in waste related use are defined as being employment generating *sui generis* and are therefore protected by policy ED2. (Although some waste operations fall within B2 use class which provides permitted change to class B1 which then may be lost to C3 residential use through the emerging change to permitted development rights. This could potentially have a significantly adverse impact on waste operations and waste apportionment in the Borough.)
- 5C13.4.6 Policy ED3 generally seeks to retain large offices but allows for redevelopment or change of use of large offices subject to tests, one being that it would not be feasible and/or viable to refurbish, renew or modernise existing offices to meet current requirements. This indirectly seeks to minimise construction waste. New development proposals will generate increased waste, particularly if demolition is involved. Increased tourism, visitors, and markets can increase litter levels and general waste. Other Local Plan policies seek to manage such impacts (e.g. EN7, T8).

**Reasonable Alternatives (RAs)**

*The RAs identified for policy ED1 KIBAs include not having any KIBAs; allowing schools in KIBAs; allowing housing in KIBAs; and retaining KIBAs but reviewing boundaries based on the Employment Land Review and removing the exception of schools (as permitted by UDP). KIBAs are identified as sites appropriate for waste management. Therefore, loss of KIBAs would have an adverse impact on SA Objective 13. The Borough may not meet its apportionment targets as outlined in the London Plan. Allowing housing and or schools in KIBAs gives rise to conflicts in amenities / reverse sensitivity issues / bad neighbour uses which may cause difficulties between waste operators and residents.*

*The RA for policy ED2 Business uses outside of KIBAs is to allow loss of employment generating uses; not have the exception of loss for D1 uses; and increasing the length of time a site must be marketed for B1 use before allowing residential use. In terms of SA Objective 13, it is considered that not controlling loss of employment generating uses would limit sites available in the Borough for waste management, which would lead to adverse effects on the achievement of SA Objective 13.*

**Transport policy T8**

- 5C13.4.7 The Delivery and Servicing Plan required by policy T8 will include information on waste collection facilities. It is considered that the Construction Logistics Plan should also include options for reducing, segregating, storing and removing waste from sites. This may need to be made more explicit in the policy.

**Recommendation 151:** that policy or supporting text is clear that the Construction Logistics Plan includes options for reducing, segregating, storing and removing waste from site.

**Environment policies EN4 and EN7**

- 5C13.4.8 The Code for Sustainable Homes and BREEAM standards both include waste management measures as part of their assessment of development proposals where credits are awarded for effective waste management including reuse and recycled materials. Existing waste transfer and management sites are safeguarded under policy EN7, and this policy also supports policies ED1 and ED2 in the provision of business sites used for waste management. Policy EN7 respects the waste hierarchy, in particular the efficient use of resources, the reuse of materials and resources and the recovery of energy from materials. In the interests of maximising effects in terms of waste management, it is considered that on-site waste management facilities should be incorporated into all major development proposals. Waste is an integral part of development and growth and should therefore be managed as much as possible locally and on-site. Rather than stating unless it is demonstrated that provision of this is not viable; if this part of the policy must be retained the word 'viable' should be replaced with 'possible'. It is noted that supporting text paragraph 9.55 refers to the word 'feasible'. The policy may benefit from some supporting text on what constitutes on-site waste management facilities outside the ambit of refuse / recycling storage (policy Q13).
- 5C13.4.9 While the policy (EN7) does not explicitly mention Site Waste Management Plans (SWMP), supporting text paragraph 9.56 does and refers back to policy T8 Servicing. Policy T8 does not explicitly require a SWMP, but rather servicing plans which will also include waste collection. The Site Waste Management Plans Regulations 2008 impose a legal duty to prepare such a plan for a project on any one construction site with an estimated cost greater than £300,000. Therefore it may not be necessary for the Local Plan to contain policy on SWMP, however it is considered that such plans offer environmental and economic benefits for all planning applications, including those not bound by statutory requirement. At the very least it will require developers to consider waste as an integral part of their project in a holistic manner. It is also noted that composting facilities are not provided for in the draft Local Plan except indirectly through Code for Sustainable Homes assessments. Composting facilities would support local food growing (policy EN2).

**Recommendation 152:** That on-site waste management facilities are incorporated into all major development proposals.

**Recommendation 153:** Amend supporting text paragraph 9.56 to ensure it is consistent with policy T8 Servicing (i.e. policy T8 does not explicitly refer to Site Waste Management Plans).

**Recommendation 154:** consider requiring Site Waste Management Plans for all developments / planning applications.

**Recommendation 155:** incorporate provision in Local Plan for composting areas in new residential developments.

**Reasonable Alternatives (RAs)**

*The RA for policy EN7 waste management is to allocate sites for waste management rather than indicate broad locations (as proposed). It is considered that the alternative risks blighting an area (which may in fact never be used by a waste operator) and this could have adverse impacts on local communities if pride of place and amenities are eroded. Sites identified by the Council may not be desirable to waste operators; similarly sites identified today may not be suitable to operators in future. Therefore, allocating sites for waste use may not most efficiently or effectively achieve SA Objective 13.*



**Quality of built environment policies Q13, Q21**

- 5C13.4.10 Policy Q13 is for refuse and recycling storage and provides for 'all development', 'new-build schemes', and 'conversions and intensification of use'. Clarification is sought on whether the policy clearly provides for refurbishments, extensions, alterations and change of use. Recommendation 103 made in the appraisal against SA Objective 7 is further supported with reference to SA Objective 13.
- 5C13.4.11 Local Plan policies seek to sustain and enhance the historic environment, ensure heritage assets are in viable use and discourage development involving demolition in conservation areas. This has positive effects on SA Objective 13 as it significantly reduces the likelihood that designated buildings will be demolished to make way for new buildings, and therefore avoids increased levels of construction waste which forms a large contribution to London's waste production. Therefore, the adaptive re-use and full occupancy of historic buildings has an important relationship with the issue of waste.

**Recommendation 156:** Ensure that refurbishments, extensions, alterations and change of use of provided for in policy Q13.

**Places and neighbourhoods policies PN1 – PN10**

- 5C13.4.12 The Borough will see substantial new residential and mixed-use development in particular centres (for example Waterloo, Vauxhall, Brixton, Streatham) which will give rise to significant quantities of waste during construction and occupation. All of the places and neighbourhood policies excluding Brixton do not explicitly recognise this; however other Local Plan policies will also be relevant for development occurring in these places, as well as other development strategies such as applicable Opportunity Area Frameworks, and SPDs which do address waste management and minimisation, for example the Vauxhall, Nine Elms and Battersea Opportunity Area Framework proposes an anaerobic digestion plant at New Covent Garden market (in Wandsworth Borough).
- 5C13.4.13 It may be considered appropriate for some places and neighbourhood policies, particularly those involving comprehensive regeneration to specifically acknowledge waste generation and measures to mitigate this, such as encouraging or expecting in-ground refuse storage and free standing refuse storage as referred to in policy Q13.
- 5C13.4.15 Policy PN3 for Brixton seeks implementation of town centre energy and waste management strategies in line with 'One Planet Living' principles including sustainable waste management and recycling facilities. Incorporation of this into the policy is commended. However, given specific provision of waste is included in this policy and not others may suggest that there has been no regard or thought to the management of waste arising from proposed development in other centres. It is recommended that the policy team consider any implications of this.
- 5C13.4.16 Policy PN7 includes provision for the reuse of the Oval House Theatre 'as necessary'. The Theatre is not a statutory listed or locally listed building, nor is it included within a conservation area, and therefore is not protected by heritage related quality of built environment policies. It is uncertain whether the current wording of the policy ensures the Theatre will be reused (specifically use of the words 'as necessary' may be argued to dilute the requirement to reuse the building). It may be better if 'as necessary' is replaced with 'in future' to acknowledge the Theatre's possible future move to Brixton. It is recommended that this is reviewed by the policy team.

5C13.4.15 Loughborough Junction currently accommodates two KIBAs; the Shakespeare Road Depot KIBA comprises a single use site used by the Council for storing its waste fleet. KIBAS are protected by policy ED1. Recycling centres are also in Loughborough Junction; however these are not located within KIBAs but should be protected by policy ED2. The Loughborough Junction policy PN10 makes provision for public realm improvements, creative industries, improved retail and leisure environment, reduced need to travel and to engender a sense of pride in the area. It is noted that the policy does not directly address the existing KIBAs (and the waste services it offers the Borough) and how these will be incorporated into the successful local centre the policy seeks to achieve. The policy team may wish to review this policy with regard to waste management and management of environmental effects.

**Recommendation 157:** That the policy team review the places and neighbourhoods policies, particularly PN1 – PN4, PN8, PN10 with the view of incorporating guidance on how waste is to be managed given the quantum of redevelopment proposed. For example, it may be appropriate for some areas, or even specific housing estate regeneration projects to include in-ground or free standing refuse storage. The policy team should also consider the implications of not making explicit provision of waste management in some policies when provision is included for Brixton in policy PN3.

**Recommendation 158:** that the policy team review policy PN7 to ensure that Oval House Theatre will be reused in future.

**Recommendation 159:** The policy team may wish to review policy PN10 Loughborough Junction on how it is envisaged that existing KIBA sites and other sites used for industrial purposes, including waste management like recycling centres will be included in the proposal to improve Loughborough Junction.

## 5C13.5 Assessment of Sites

### Likely significant effects of implementing Site Allocations, taking into account mitigation

5C13.5.1 All sites in Table 50 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 13.

**Table 49: Significance criteria for SA Objective 13: Waste**

Positive	Negative
<ul style="list-style-type: none"> <li>Does not constrain appropriate sites for the sustainable management of waste within the borough and promotes sustainable waste management.</li> <li>Improves design in order to encourage more sustainable waste management, e.g recycling.</li> </ul>	<ul style="list-style-type: none"> <li>Constrains future sustainable waste management options or locations.</li> <li>Poor design for sustainable waste management.</li> </ul>

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**TABLE 50: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 13: WASTE**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	- does not constrain appropriate sites for the sustainable management of waste within the Borough - retention of 10 Royal Street and Holy Trinity Urban Centre (avoids demolition waste)	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	- does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
3	Vale Street Depot, Vale Street SE27	- retains existing reuse and recycling centre on site	- constrains future sustainable waste management options through loss of depot for waste collection vehicles - no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
4	Elizabeth House, York Road SE1	- does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
5	Shell Centre, 2-8 York Road SE1	- retains existing Shell Centre tower (avoids demolition waste) - does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
6	Waterloo Station, Waterloo Road SE1	- retains existing buildings, train shed and terminal building (avoids demolition waste) - does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
7	Cornwall Road Bus Garage, Cornwall Road SE1	- does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	- site allocation seeks to bring back into use underused and vacant premises (avoids demolition and reduces construction waste) - does not constrain appropriate sites for the sustainable management of waste within the	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13

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		Borough		
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	- existing public house to be retained - does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	-retains listed building fronting Wandsworth Road (avoids demolition waste) - does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	- does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
12	Somerleyton Road SW9	- does not constrain appropriate sites for the sustainable management of waste within the Borough - retains Carlton Mansions (avoids demolition waste)	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
13	Popes Road SW9	- does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
14	Brixton Central (between the viaducts) SW9	- does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
15	SW2 Enterprise Centre	- includes refurbishment of key landmark buildings - inclusion of Conservation Area means Conservation Area Consent would be required for demolition of Town Hall Parade buildings, including robust justification - does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13
16	260 – 367 Norwood Road SE27	- does not constrain appropriate sites for the sustainable management of waste within the Borough	- no mention of waste in terms of design for site	Compliance with other Local Plan policies particularly T8, EN4, EN7, Q13

## 5C13.6 Summary of Local Plan policies and site allocations

5C13.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have a positive effect on the minimising waste, maximising reuse and recycling of waste, and increase landfill diversion. It is also considered that the Draft Local Plan policies support and where appropriate improve existing baseline conditions.

**Table 51: Summary assessment of effects of draft Local Plan for waste**

Assessment of effects of the Local Plan on SA objective 13	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates	+/-/?	+/?	<p>Without the proposed policy amendments, it is considered that the Draft Local Plan would have both positive and negative effects on the SA objective. It is considered that the default position should be for on-site waste management facilities for all developments, not just major developments. Such facilities may be commensurate with the level of development proposed.</p> <p>Positively, the Local Plan seeks to bring back into use vacant buildings and protects KIBAs and employment generating <i>sui generis</i> (which includes waste management) sites. Policy EN7 on waste management and policy Q13 refuse and recycling storage should result in positive effects and continue positive trends on baseline data. Some site allocations specifically seek to retain existing buildings or bring back into use underused and vacant premises. However most site allocations do not address waste in any further detailed way.</p> <p>It may be prudent for town centres and site allocations to specify appropriate types of waste management, e.g. underground storage.</p> <p>Annex 2 Infrastructure Schedule identified a current funding gap of £500K for a Waste Transfer Station and possible refurbishment of Lambeth's Reuse and Recycling Centre highlighting a potential uncertainty of managing future waste. There is also uncertainty on meeting the shortfall in capacity between current sites and London Plan apportionment target. There is also further uncertainty on the impact (if any) the merging changes in permitted development rights from B1 to C3 use may have on the availability of sites for waste in the Borough.</p> <p>Achievement of high Code for Sustainable Homes and BREEAM standards should also ensure positive effects with regards to waste as these assessment tools contain waste components.</p>	<p>It is considered that operations to minimise waste, maximise reuse and recycling of waste and increase landfill diversion will be evident in the short term as excellent waste management procedures and facilities are already in operation.</p> <p>Evidence of achievement will unlikely be evident until at least the medium to long-term as the large scale redevelopment of key locations occurs, and funding is identified for the Waste Transfer Station / further capacity requirements are met and refurbishment of reuse and recycling centre.</p>	<p>Temporary effects associated with demolition and construction, however it is considered that these can be managed on-site, and reuse of materials will be encouraged.</p> <p>Growth in the Borough is likely to produce permanent and ongoing effects in waste generation and these will need to be continuously processed, managed and monitored.</p>

## 5C13.7 Recommendations for monitoring likely uncertain effects

5C13.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Annual update of Infrastructure Schedule

## **5C14. AIR QUALITY**

5C14.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

Objective 14: To improve air quality.

5C14.0.2 To achieve this objective, plan policies should reduce PM10, NO2 and ozone depleting substances; 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 targets; support the planting of trees; and promote the 'transport hierarchy'.

### **5C14.1 Relevant policy objectives**

#### National Level

5C14.1.1 The *National Planning Policy Framework 2012* states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.

5C14.1.2 The *Air Quality Strategy (2007)* for England, Scotland, Wales and Northern Ireland provides a baseline of air quality and sets critical emissions levels not to be exceeded.

#### Regional Level

5C14.1.3 The *London Plan (2011)* contains a number of policies that seek to address air quality and natural resources. For example proposals should promote sustainable design and construction to reduce emissions, and aim to be 'air quality neutral' and not lead to further deterioration of existing poor air quality. Boroughs should seek reductions in levels of pollutants referred to in the Air Quality Strategy and take account of findings of local borough air quality review and assessments and action plans, in particular where Air Quality Management Areas have been designated.

#### Local Level

5C14.1.4 The Borough has an Air Quality Action Plan, the purpose of which is to ensure that air quality is considered corporately and to seek to reduce air pollution within the Borough, in pursuit of the Government's air quality objectives.

### **5C14.2 Baseline conditions and existing issues**

5C14.2.1 The whole Borough is within an Air Quality Management Area in relation to a breach of nitrogen dioxide (annual mean and hourly mean) and particulate matters (daily mean and annual mean) objectives as specified in the Air Quality Regulations 2000.

5C14.2.2 Road traffic continues to be the primary cause of air pollution in London and in Lambeth around 90 % of all air pollution is caused by road vehicles. Vehicle pollutants of greatest concern are Nitrogen Dioxide and Fine Particles (PM10). Carbon Monoxide and Volatile Organic Compounds such as Benzene and 1, 3-Butadiene are also of potential concern, as is Ozone.

5C14.2.3 The Borough continues to suffer from high levels of fine particles (PM10) and Nitrogen Dioxide (NO2). There is increasing evidence to show that despite all the efforts that have been made locally with implementing an Air Quality Action Plan, roadside and kerbside levels of Nitrogen Dioxide have not significantly decreased.

Levels of fine particles (PM10) have also remained broadly constant.

- 5C14.2.4 A recent Defra study has demonstrated that the emissions of vehicles in day-to-day driving conditions in cities -particularly diesel cars - have not been decreasing in line with the increasingly stringent EU limits applied to new designs.

### **5C14.3 Likely evolution without the Plan**

- 5C14.3.1 In the absence of the Local Plan the Council will need to rely on the provisions in the Core Strategy, Air Quality Action Plan and London Plan. Given the level of growth assigned to the Borough in the London Plan together with road traffic being a primary cause of air pollution; in the absence of the Local Plan growth may occur in a manner that generates more traffic movements, or using materials that are not locally sourced. Development granted under the NPPF will likely exacerbate local air quality problems.

### **5C14.4 Assessment of Policies**

#### **Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation**

- 5C14.4.1 The main policies relevant to achievement of the SA Objective are:

D1 – Delivery and monitoring	T7 - Parking
D2 – Presumption in favour of sustainable development	T8 – Servicing ?
D3 – Infrastructure	EN4 – Sustainable design and construction
D4 – Planning obligations	Q11 - Trees
D5 - Enforcement	PN1 – Waterloo
H1 – Maximising housing delivery	PN2 – Vauxhall
T1 – Sustainable travel	PN3 – Brixton
T2 – Walking	PN4 – Streatham
T3 – Cycling	PN5 – Clapham
T4 – Public transport infrastructure	PN6 – Stockwell
T5 – River transport	PN7 – Oval
T6 – Assessing impacts of development on transport capacity	PN8 – West Norwood / Tulse Hill
	PN9 - Herne Hill
	PN10 Loughborough Junction

#### ***Delivery and monitoring policies D1 – D5***

- 5C14.4.2 The level of development proposed for the Borough is such that it is inevitably going to place increased stresses on air quality. However, effects can be mitigated. Policy D4 seeks to provide or fund local improvements to mitigate the impact of development and includes transport infrastructure (public transport, walking and cycling networks), public realm improvements and parking restrictions.

- 5C14.4.3 As highlighted previously (in the appraisals against SA Objectives 7 and 10) there is some concern, particularly regarding cumulative impacts on air quality, with the policy approach of policy D5 Enforcement.

#### ***Transport policies T1 – T8***

- 5C14.4.4 It is considered that the transport policies should result in significant positive effects on SA Objective 14 as the policies seek to reduce dependence on the private vehicle, encourage walking and cycling, improve public transport capacity and accessibility and reduce the need to travel. It is considered that policy T1 could be amended to reflect benefits of electric vehicles by segregating electric cars from private cars. Maximising use of the River Thames is also encouraged in terms of SA Objective 14 and policy T5 is supported.

- 5C14.4.5 A major cause of poor air quality from vehicles comes from stationary taxis parked in taxi ranks with their engines running. If there are existing ambient air quality issues in an area proposed for a new taxi rank, air pollution problems may be exacerbated. While this is more of a behavioural change problem that should be addressed through education and awareness raising; it might be appropriate to consider air quality impacts arising from proposals involving new taxi ranks. For example taxi ranks in enclosed spaces such as railway arches may cause significant localised poor air quality. The policy team may wish to consider including 'environmental quality' in policy T9(a).

**Recommendation 160:** That electric cars are identified as distinct from private cars on the road hierarchy of policy T1.

**Recommendation 161:** The policy team consider including environmental quality as a consideration in proposing new taxi ranks under policy T9(a).

***Environment and open space policies***

- 5C14.4.6 Code for Sustainable Homes and BREEAM assessment tools include categories on pollution which may assist in improved air quality. The policy also provides for living roofs and walls which help to reduce local air pollution. Recommendations 35 and 58 for enhancing these policy areas are further endorsed with respect to SA Objective 14.

***Trees policy Q11***

- 5C14.4.7 As highlighted previously, policy Q11 on trees tends to protect existing trees rather than encourage a net increase of trees on site, however supporting text paragraph 10.31 alludes to the planting of trees as part of the development. It is further recommended that the policy is strengthened to require a net increase in trees on site.

***Places and neighbourhoods policies PN1 – PN10***

- 5C14.4.8 The policy for Waterloo should assist in tackling poor air quality by the promotion and improvement in capacity and accessibility of public transport, loss of Hungerford car park, reducing the need to travel (i.e. mixed use developments including accommodation, employment, community services and facilities) and improvements to public realm and open space including permeability to Waterloo Station. These measures seek to improve air quality, however high levels of fine particles (PM10) and Nitrogen Dioxide (NO<sub>2</sub>) may still remain given the levels of growth proposed and taking into account previous efforts in implementing the Air Quality Action Plan, that have not resulted in significantly decreased roadside and kerbside levels of Nitrogen Dioxide, particularly in central locations.
- 5C14.4.9 Policy PN2 provides for a new district centre comprising of mixed use development which aims to reduce the need to travel. The policy also promotes improved transport experience through increased capacity of public transport infrastructure, improved walking and cycling environments, and simplified road junctions and crossings. These measures are supported, and will help to ensure that the new development and increased population growth expected for the Vauxhall area does not result in deteriorated air quality on baseline conditions provided they are delivered. Annex 2 suggests that implementation of Vauxhall rail station improvements to lengthening platforms is uncertain as details of funding are not known. More positively, projects for increasing capacity of both the underground and overground are considered deliverable (funding secure) or have been completed already. However, the area



does still suffer from poor air quality. PM10 and NO2 are very high around the Vauxhall gyratory. The policy states improvements to this area will include working towards the removal of the gyratory. This should result in more positive effects with a better balance between cars, pedestrians and cyclists, however there is some uncertainty whether this will be appropriately delivered, and thus result in improved air quality in this area. In the short term the area is unlikely to result in improved air quality due to emissions associated with new construction (lorry trips, use of heavy vehicles). Tree planting could be specifically included in the policy, either through clause (g) or clause (i).

- 5C14.4.10 Policy PN3 on Brixton seeks public transport, walking and cycling improvements. It also seeks to augment opportunities to meet needs locally by strengthening Brixton's town centre role and promoting mixed use development, reducing the need to travel. Such measures should help to tackle poor air quality issues. However, development of Popes Road temporary ice rink site to include town centre car parking will encourage vehicles into the town centre. The former multi-storey car park on Pope's Road was closed in 2009 for various reasons and it was not used at capacity anyway. Provision for loss of this car parking has been provided in Buckner Road. Any car parking provision promoted by the policy should be minimised taking into account air quality, health impacts, public realm, walkability of the area and locational issues including the exceptional PTAL level of the centre. At the very least car parking should not result in a net increase of parking spaces already currently provided for the town centre. The inclusion of car parking proposed for Brixton town centre means that effects on achievement of SA Objective 14 are uncertain at best.
- 5C14.4.11 As part of improved public transport provision and interchange; the policy proposes a new East London Line station at Brixton and an appropriate replacement for the role and function of the former Cross River Tram. Therefore, while the policy promotes the transport hierarchy, delivery of these projects is uncertain as no funding has been identified for either projects and the latter project is not currently included in TfL's business plan.
- 5C14.4.12 Policy PN4 for Streatham supports accessibility and use of public transport, walking and cycling through improvements to public transport facilities, the public realm and measures to reduce the impact and dominance of road traffic. It also states that car parking will be sought appropriate to the nature and scale of development. It may be argued that these aspirations conflict each other and indeed the seeking of car parking could be argued as in conflict with car parking policy T8. As a minimum, and in addition to consideration to the nature and scale of development, public transport accessibility should also be taken into account when determining car parking provisions. Car parking should be significantly less than London Plan standards. Policy PN8 also states car parking will be sought, and the above comments therefore also apply for West Norwood / Tulse Hill. Previous recommendation X is further supported with respect to SA Objective 14.
- 5C14.4.13 Likewise, adverse effects on air quality could result from policy PN5 for Clapham as it seeks to improve vehicle movement. It is recommended this part of the policy (contained in clause (b)) is amended to reflect supporting text which refers to reducing the dominance of traffic. However, it is equally recognised that a major road runs through Clapham (indeed major roads run through all town centres) and it is to be expected that vehicles will continue to use major roads and therefore traffic flow is important.

- 5C14.4.14 Policies PN6 Stockwell and PN7 Oval also seek improvement of traffic and environmental conditions for pedestrians. Recommendation 14 on including cyclists is also supported with regard to SA Objective 14.
- 5C14.4.15 Policy PN10 for Loughborough Junction should result in improved local air quality as it seeks to ensure that all necessary services and amenities are within close walking distance of every home; that the number of walking and cycling routes in the area is maximised; and the number of people driving through the area is reduced, particularly those travelling under two miles.
- 5C14.4.16 However, none of the places and neighbourhood policies explicitly make provision for the planting of trees. It could be argued that this may fall within 'public realm improvements' (provided for in most policies), however it is considered that trees, particularly street trees play a role in successful town centres, by contributing air quality benefits, but also improved character, sense of place, and amenity. Living walls and roofs also play a key role in achieving these benefits. It is recommended that consideration is had to what these town centres should look like visually in terms of greenery, vegetation and trees, and therefore this element of place making should be included in the places and neighbourhoods policies.

**Recommendation 162:** Clause (b) of policy PN5 could be amended from 'improve vehicle movement' to 'reduce the dominance of traffic' to better align with supporting text and SA Objective 14.

**Recommendation 163:** that the policy team consider incorporating details on the provision of trees in particular, (but also vegetation generally and living roofs and walls) appropriate for each town centre.

**Recommendation 164:** that the policy team review the necessity of car parking provision in Brixton given the existing provision in place and the exceptional public transport accessibility of the town centre. If additional car parking is required, the policy should be guidance on the maximum level acceptable.

## 5C14.5 Assessment of Sites

### Likely significant effects of implementing Site Allocations, taking into account mitigation

- 5C14.5.1 All sites in Table 53 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 14.

**Table 52: Significance criteria for SA Objective 14: Air Quality**

Positive	Negative
<ul style="list-style-type: none"> <li>• Site is within an Air Quality Management Area</li> <li>• Allocation supports sustainable transport and travel.</li> <li>• Promotes planting of vegetation and wildlife habitats.</li> </ul>	<ul style="list-style-type: none"> <li>• Site not within an AQMA.</li> <li>• Allocation encourages private car use.</li> <li>• Reduces vegetation and wildlife habitats.</li> <li>• Propose land use may contribute to air pollution (e.g. polluting industry).</li> </ul>

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**TABLE 53: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 14: AIR QUALITY**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	- Site is within an Air Quality Management Area	- proposed land use as a school may contribute to air pollution through vehicle journeys associated with school drop off and pick up	Compliance with draft Local Plan policies particularly transport policies
3	Vale Street Depot, Vale Street SE27	- Site is within an Air Quality Management Area	- allocation encourages private car use (reuse and recycling centre and possible housing too due to poor public transport accessibility) - proposed land use as a school may contribute to air pollution through vehicle journeys associated with school drop off and pick up	Compliance with draft Local Plan policies particularly transport policies
4	Elizabeth House, York Road SE1	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
5	Shell Centre, 2-8 York Road SE1	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
6	Waterloo Station, Waterloo Road SE1	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
7	Cornwall Road Bus Garage, Cornwall Road SE1	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.	- allocation promotes vehicle use (fire engines)	Compliance with draft Local Plan policies particularly transport policies
9	Keybridge House, 80 South Lambeth	- Site is within an Air Quality Management Area	- if used as school, potential	Compliance with draft Local

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	Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	- Allocation supports sustainable transport and travel.	contribution to air pollution due to school drop off and pick up	Plan policies particularly transport policies
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
12	Somerleyton Road SW9	- line of plane trees on grass verge protected - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
13	Popes Road SW9	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.	- allocation promotes private vehicle use (town centre car parking)	Compliance with draft Local Plan policies particularly transport policies
14	Brixton Central (between the viaducts) SW9	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
15	SW2 Enterprise Centre	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.		Compliance with draft Local Plan policies particularly transport policies
16	260 – 367 Norwood Road SE27	- Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel.	- allocation promotes private vehicle use (car parking)	Compliance with draft Local Plan policies particularly transport policies

## 5C14.5 Summary of Local Plan policies and site allocations

5C14.5.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, projected population growth, and the housing targets assigned in the London Plan to be delivered in Lambeth; it is considered that the Local Plan policies seek to manage efficiently air quality.

**Table 54: Summary assessment of effects of draft Local Plan on air quality**

Assessment of effects of the Local Plan on SA objective 14	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
To improve air quality	?/+	?/+	<p>It is considered that the policies seek to tackle air quality issues for example by reducing the need to travel, discouraging private vehicle use and encouraging more walking and cycling and use of public transport, provision for living roofs and walls (although as recommended this could be strengthened), and protection of existing trees and open space (although it is recommended developments result in a net increase in trees). Much development (including site allocations) is proposed in existing town centres and around public transport nodes. However, much needed improvements to some public transport infrastructure remain uncertain due to identified funding gaps (for example addressing overcrowding on Northern Line, Vauxhall overground station improvements, and a new station at Brixton for the East London Line Extension). The northern line may not be delivered before occupation of sites in the Opportunity Area. Also, despite the whole Borough being a designated Air Quality Management Area and previous efforts implementing the Air Quality Action Plan, there has not been a significant decrease in roadside and kerbside levels of Nitrogen Dioxide.</p> <p>Recommendations such as seeking a net increase in trees and planting for developments, requiring living roofs or walls unless not feasible, and not actively seeking car parking in town centres with good public transport accessibility levels will further seek to improve air quality relative to expected growth.</p>	<p>Public transport infrastructure (such as Northern Line extension or the new station at Brixton) is likely to be delivered (if at all) in the mid to long-term at the earliest and is dependent on securing funding. Efficient management of air quality in the Borough, given the projected population increase and level of development proposed necessitates the delivery of clean and efficient transport.</p> <p>Measures to improve localised air quality such as increased greenery will likely be evident in the medium term as developments are completed and soft landscaping, tree planting and living roofs / walls become established.</p> <p>Improvements of the Vauxhall gyratory which currently has poor air quality will likely be evident in the longer term as decisions are yet to be made how the gyratory is improved for best effect.</p>	<p>Permanent.</p> <p>Temporary adverse air quality effects associated with heavy vehicle movements and dust will be likely in the short and medium terms as developments are constructed. Such effects will be addressed in the Construction Logistics Plan required by policy T8 Servicing.</p>

## 5C14.6 Recommendations for monitoring likely uncertain effects

5C14.6.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Percentage of residents with health problems related to air pollution/quality
- Improvement of air quality at the monitoring stations around the Borough
- Annual update of Infrastructure Schedule

## **5C15. EDUCATION AND SKILLS**

5C15.0.1 This section of the SA relates to the sustainability performance of the Local Plan against:

- Objective 15: To maximise the education and skills levels of the population.

5C15.0.2 To achieve objective 15 plan policies should improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages; contribute to up-skilling and to meeting skills shortages; and promote healthy, sustainable living.

### **5C15.1 Relevant Policy Objectives**

#### National Level

5C15.1.1 *Skills for Growth – the national skills strategy (2009)* is a strategy for economic growth and individual prosperity. It identifies that skills are a key part of our plan for economic recovery, and an urgent challenge. Commitments in the strategy include investing in skills in the sectors on which future growth and jobs depend, and empowering individuals through skills giving people 'consumer choice' and better information about courses.

5C15.1.2 *National Planning Policy Framework 2012* states that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Policies should also guard against the unnecessary loss of valued facilities and services.

#### Regional Level

5C15.1.3 Policies in the *London Plan (2011)* seek to ensure appropriate education facilities are provided for local needs from pre-school to higher and further education institutions and community learning facilities; protect and enhance social infrastructure; and improve opportunities for all, including local employment, skills development and training opportunities.

### **5C15.2 Baseline conditions and existing issues**

5C15.2.1 The number of school places in the borough is currently insufficient to meet future demand, both at secondary and primary level. It is the Council's aspiration to provide a year 7 place for 80% of pupils leaving primary school. There is a current shortage of primary school places to meet existing demand, and further places will be required to meet projected future population growth. The estimated current and future demand has identified particular shortages in Brixton, Norwood and Streatham. Demand for school places in Lambeth is increasing as the population grows. In some areas demand has risen by 40 per cent in just four years (Housing Strategy 2012).

5C15.2.2 Current provision includes 14 Secondary Schools, 62 Primary Schools, five Special Schools and 27 Children's Centres in the Borough.

5C15.2.3 In 2011, 80% of pupils in Lambeth achieved 5+ A\* - C Grades in GCSE's which is higher than both the inner London average (78.9%) and national average (79.5%) (Lambeth Council 2012).

- 5C15.2.4 Forty six percent of Lambeth residents have degree level qualifications which is 10<sup>th</sup> highest nationally and high than Inner London (44%). This is up from 41% in 2001 (Census 2011). Conversely, 14% of Lambeth residents have no qualifications at all, which is amongst the lowest proportions nationally (Census 2011). This is down from 20% in 2001 and is also less than Inner London average (15.8%).
- 5C15.2.5 Lambeth has the second highest ratio of young people who are not in education, employment or training (NEET) of the Central London First Boroughs (Southwark 9.9%, Lambeth 8.3%) (Housing Strategy 2012).
- 5C15.2.6 Lambeth has a number of further and higher education establishments including King's College and Lambeth College (largest provider of adult and community learning in the Borough). King's College aims to be one of the top six universities in the UK, and one of the top twenty-five internationally. It plans to grow by 3,000 students over the next five to ten years. Its estate comprises five main campuses, of which four are wholly or partly in Lambeth. These are at Waterloo, St Thomas's, Guy's and Denmark Hill (which straddles the border with Southwark and is closely associated with King's College Hospital).
- 5C15.2.7 The Waterloo campus is particularly critical and includes four buildings. King's wishes to expand to another site in the area and would like to see its Waterloo campus develop as an educational and cultural quarter linked to the South Bank. The shortage of good quality, affordable and local student housing has become an issue recently. An additional 1,000 beds are required to meet projected demand at King's. In addition to buying in accommodation from student housing providers, King's is looking at its own assets to provide accommodation, particularly for overseas and post-graduate students (King's College London Strategic Plan 2006 – 2016).

### 5C15.3 Likely evolution without the Plan

- 5C15.3.1 Education facilities will continue to be provided in the absence of the Local Plan. However, they may not be located in the best areas from a spatial planning perspective. For example, the Core Strategy allows for schools on employment land (both within and outside KIBAs) and the Local Plan seeks to remove this exception within KIBAs. To meet expected demand, school provision in the Borough needs to be expanded and sites in the Borough should be identified for this purpose in areas to meet expected demand. Similarly, in the absence of the Local Plan, development may occur at a rate and in locations that far exceeds social infrastructure, which will result in unsustainable communities and environments.

### 5C15.4 Assessment of Policies

#### Likely significant effects of implementing the proposed Draft Local Plan policies as a whole, taking into account mitigation.

- 5C15.4.1 The following policies are considered to be the most relevant to the achievement of Sustainability Objective 15:

D1 – Delivery and monitoring  
D2 – Presumption in favour of sustainable development  
D3 – Infrastructure  
D4 – Planning obligations  
H7 – Student housing  
ED2 – Business uses outside KIBAs  
ED6 – Town centres  
ED15 – Employment and training

SI1 – Safeguarding existing community facilities  
SI2 – New or improved community facilities  
SI3 – Schools  
EN2 – Local food growing  
PN1 – Waterloo  
PN2 – Vauxhall  
PN3 – Brixton  
PN4 – Streatham

PN5 – Clapham  
PN6 – Stockwell  
PN7 – Oval

PN8 – West Norwood / Tulse Hill  
PN9 - Herne Hill  
PN10 Loughborough Junction

***Delivery and monitoring policies***

- 5C15.4.2 Overall, it is considered that policies D1 - D4 should result in positive effects on SA Objective 15, particularly policy D4 which seeks planning obligations to fund infrastructure including education, health, libraries, cultural and community provision.

***Housing policy H7***

- 5C15.4.3 The loss of existing student accommodation in the Borough is resisted through policy H7, unless adequate replacement provision is provided or it is demonstrated that that facility no longer caters for future or current needs. In line with London Plan policy the approach to policy H7 is that the demands for student housing does not compromise capacity to meet the need for conventional housing, especially affordable housing or family housing, or undermine policy to secure mixed and balanced communities. Proposals should also not result in loss of employment land or floorspace. Student housing should form part of mixed use developments, and be linked to a higher education institution. Overall, it is considered that the policy provides for student housing, delivered in a sustainable manner (close to amenities, transport and is affordable), promotes healthy sustainable living, and improves opportunities and facilities for formal learning. However, it is noted that the draft Local Plan contains strong provisions for the delivery of conventional dwellings and employment generating land / floorspace, and therefore difficulties in identifying appropriate sites for student housing may arise. Paragraph 5.60 states that anticipated growth in numbers of full time higher education students is expected. While existing student accommodation will be protected, it is uncertain whether Local Plan policies taken as a whole will positively meet future demand.

***Economic Development policies ED2, ED15***

- 5C15.4.4 To help meet demand for much needed school places policy ED2 (which seeks to protect business use land outside of KIBAs) makes exception to allow loss of such land for D1 use, which includes non-residential education and training centres, as well as other facilities that help skill the population such as libraries, museums, and public halls which often accommodate informal and vocational learning for all ages. It is considered that this exception to policy ED2 allows for significant positive effects to result in terms of achieving SA Objective 15.
- 5C15.4.5 The level of development proposed for the Borough provides opportunities for jobs and apprenticeships in construction and ancillary sectors. Policy ED15 seeks to maximise such opportunities, reduce unemployment and provide training schemes to upskill the population which, if implemented effectively, should result in significant positive effects for local residents, and the attainment of SA Objective 15.



**Reasonable Alternatives (RAs)**

*The RAs identified for policy ED1 KIBAs include allowing schools in KIBAs. In terms of SA Objective 15 releasing more land for schools would likely help meet the demand for school places. However, the location of schools in some KIBAs may not be conducive to a safe environment for learning (heavy vehicle movements, noise, vibration, odour etc). The appropriateness of schools in KIBAs would depend on the location and environment and existing land use of each individual KIBA. Some KIBAs may be more appropriate than others. Policy ED2 does allow exception to the protection land currently in employment generating use for school places (D1 uses) where there is an identified need. The RA identified for ED2 is to not allow this exception. It is considered that this would result in adverse impacts on the achievement of SA Objective 15.*

*The RA identified for policy ED15 skills and training was to require a financial contribution from developers for training schemes. However, this was dismissed as this would make the cumulative impact of policies unviable, and too onerous for the developer. If this could be a viable requirement in future, it is considered that such a financial contribution would have a positive impact with regards to SA Objective 15.*

**Social infrastructure policies S1 – S3**

5C15.4.6 Policies S1, S2, and S3 should result in positive effects on SA Objective 15 as they seek to maintain an adequate supply of land for education and community uses. New or improved premises will need to be delivered in a sustainable manner, including accessible to the community, not result in adverse impacts (hours of operation, noise traffic etc), and accommodate shared use of premises where possible. Large residential schemes and comprehensive housing estate regeneration will also need to provide appropriate provision for social infrastructure where this cannot be met through existing facilities.

5C15.4.7 Annex 2 identifies projects for new primary or secondary schools for the Borough. There are some identified funding gaps which could threaten delivery of new school places. Contingency plans have been prepared and include expanding provision of existing schools, although depending on how this is delivered; may result in adverse impacts on children's learning through larger class numbers. Accordingly, it may be argued that deliverability and effectiveness of additional school places is uncertain.

**Reasonable Alternatives (RAs)**

*No RA have been identified for policies S1 and S2 and there have been no change in strategic approach from the adopted Core Strategy with regards to these policies. The RA identified for policy S3 schools is to allow schools in KIBAs. Dependent upon the location of KIBAs to residential areas, and the relationship to other KIBA uses and operations this alternative may in some circumstances result in positive impacts on SA Objective 15.*

**Open space and environment policy EN2**

5C15.4.8 Policy EN2 on food growing provides opportunities for informal learning and volunteering for all ages, particularly for housing estate residents. It also provides opportunities to learn about the benefits of healthy lifestyles, and offers opportunity for social interactions, all of which contribute to achieving SA Objective 15. It is further considered that food growing areas should also be encouraged as part of appropriate D class uses, and accordingly recommendation 26 is further supported.

**Places and neighbourhoods policies PN1 – PN10**

5C15.4.9 Many of the places provided for in these policies, particularly Waterloo, Vauxhall, Brixton, Streatham and West Norwood / Tulse Hill promote significant levels of development, and accordingly provide opportunities for new job creation, both during construction and occupancy. Implementation of policy ED15 will help ensure that such opportunities, especially those related to construction, are available to local residents, and provide positive prospects for up-skilling, apprenticeships and local employment.

- 5C15.4.10 Policy PN1 provides for higher education facilities in Waterloo, as well as accommodation opportunity for students of St Thomas' hospital and King's College. Mixed use development is promoted with appropriate supporting community, service and shopping facilities.
- 5C15.4.11 Policy PN2 for Vauxhall states that supporting infrastructure necessary to allow growth or mitigate the impact of development should be provided. Annex 2 of the draft Local Plan identifies a funding gap for the new primary school proposed for Vauxhall, Nine Elms, Battersea Opportunity Area that may threaten the timely provision of the school. The contingency plan is to expand other schools in the area to meet demand; however, it also states this would not support the intensive population growth expected. A local social enterprise through which community members play a lead role is proposed, and this could create opportunities for formal, informal and vocational learning for all ages. It is considered that the policy could more explicitly make provision to meet the need of additional school places.
- 5C15.4.12 In some respects policy PN3 for Brixton appropriately provides for SA Objective 15 through recognising an appropriate provision to meet the need for additional school places, and supporting community and educational uses. The Infrastructure Schedule identifies that Lambeth College in Brixton will be undergoing a redevelopment to meet future demand of the facility. While there is a funding gap, the College make clear they are committed to the redevelopment of its Brixton site and are reviewing their overall plans in order to achieve this aim. Accordingly, increases in student numbers may result, and they will need appropriate affordable accommodation. While Lambeth College is not within the town centre boundary of Brixton, it is considered that given student accommodation should form part of mixed use developments and be accessible to town centre amenities; policy PN3 would be well placed to make provision or at least acknowledge the redevelopment of the College just outside its boundaries. It is recommended that student housing provision in Brixton town centre is reviewed by the policy team.
- 5C15.4.13 Policy PN4 makes provision for community facilities, particularly alongside new development. Policy PN5 for Clapham seeks to retain the old Clapham library for community use which will likely provide opportunity for a form of learning provision on-site.
- 5C15.4.14 Education and other community uses are encouraged as part of the development proposed for West Norwood / Tule Hill town centre and the policy positively provides for identified education need in the area. Start up accommodation for small businesses is proposed and this will increase the likelihood for meeting skills shortages / up-skilling and vocational learning. A youth provision and Neighbourhood Resource Centre at Norwood Hall should also result in positive effects in terms of SA Objective 15.
- 5C15.4.15 Policy PN10 for Loughborough Junction seeks to improve the sustainability and liveability of the area by ensuring the all necessary services and access to employment are within close walking distance of every home.

**Recommendation 165:** That policy PN3 is reviewed in terms of explicit student housing provision given the proposed expansion of Lambeth College.

**5C14.5 Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

5C14.5.1 All sites in Table 56 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 15.

**Table 55: Significance criteria for SA Objective 15: Education and Skills**

Positive	Negative
<ul style="list-style-type: none"><li>• Site allocation actively supports provision of education, training or skills development.</li></ul>	<ul style="list-style-type: none"><li>• Allocation may lead to additional unmet skills or education needs.</li></ul>

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**TABLE 56: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 15: EDUCATION AND SKILLS**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	n/a	n/a	
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	- Site allocation actively supports provision of education, training or skills development.		Compliance with Local Plan policies e.g ED15, S1 – S3
3	Vale Street Depot, Vale Street SE27	- Site allocation actively supports provision of education, training or skills development.		Compliance with Local Plan policies e.g ED15, S1 – S3
4	Elizabeth House, York Road SE1		- Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
5	Shell Centre, 2-8 York Road SE1		- Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
6	Waterloo Station, Waterloo Road SE1			
7	Cornwall Road Bus Garage, Cornwall Road SE1		Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11		Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	- Site allocation may support provision of education, training or skills development (potential location).	- if new primary school not provided, allocation may lead to additional unmet skills or education needs	Compliance with Local Plan policies e.g ED15, S1 – S3
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8		Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)		Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
12	Somerleyton Road SW9	- allocation includes social enterprise / business start up spaces	Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
13	Popes Road SW9		Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
14	Brixton Central (between the viaducts) SW9	n/a	n/a	
15	SW2 Enterprise Centre		Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3
16	260 – 367 Norwood Road SE27	- allocation includes start up accommodation for small businesses	Allocation may lead to additional unmet skills or education needs.	Compliance with Local Plan policies e.g ED15, S1 – S3

## 5C14.6 Summary of Local Plan policies and site allocations

5C14.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have a positive effects on the improving the existing baseline (to the extent possible by Planning) of education and skills levels of the population.

**Table 57: Summary assessment of effects of draft Local Plan on education and skills**

Assessment of the effects of the Local Plan on SA objective 15	Score	Justification of Score	Timescale and probability	Permanent or temporary
To maximise the education and skills levels of the population	+/?	<p>In so far as planning policy is able to influence education and skills levels; it is considered that overall the Draft Local Plan will result in positive effects on SA objective 15. Employment and training policy ED15 should help maximise the number of local people working on development sites during the plan period.</p> <p>Positively, existing schools and community facilities will be safeguarded. Also some site allocations, town centres, and economic development policies make provision for the establishment of more creative and cultural industries thereby increasing the likelihood local people can find local work.</p> <p>Local food growing areas can facilitate informal learning for all ages and promote healthy sustainable living. It is recommended food growing provision is not limited to residential sites.</p> <p>However, there is some uncertainty on how and when additional school places will be delivered particularly as funding gaps have been identified in the Infrastructure Schedule. There is also some uncertainty on whether sufficient student housing will be delivered in appropriate locations. Given expansion on Lambeth College, student housing in Brixton town centre may be appropriate and perhaps the policy should make provision for this. Also the level of development proposed in the site allocations may lead to additional unmet skills or education needs</p>	<p>Existing schools and community uses are already safeguarded.</p> <p>As the population grows in response to completed developments there will likely be increased strain on school places. The contingency plans identified for temporarily expanding existing schools to accommodate growth is a likely reality in the short term. In the longer term, as funding and sites are identified it is hoped that additional schools will be delivered to support to increased demand.</p> <p>Up-skilling and apprenticeships will be evident in the short term and throughout the plan period as development is constructed and delivered.</p>	<p>Permanent and temporary</p> <p>While apprenticeships and jobs associated with construction of new development may be temporary (up to occupancy of developments); skills learnt during this time will be transferable to other areas / employment opportunities.</p> <p>Expansion of existing schools is only a temporary measure to resolve school place demand.</p>

## 5C14.6 Recommendations for monitoring likely uncertain effects

5C14.6.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Annual update of Infrastructure Schedule
- Number of additional school places provided
- Percentage reduction of young people not in education, employment or training

## 5C16&18. LOCAL ECONOMY AND TACKLING WORKLESSNESS

5C16.0.1 This section of the SA relates to the sustainability performance of the Draft Local Plan against:

- Objective 16: Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses; and
- Objective 18: Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.

5C16.0.2 To achieve objectives 16 and 18 plan policies should 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; support employment opportunities in the most deprived areas and groups and stimulate regeneration; enable people to live better for a given income by reducing their need for paid goods and services; contribute to sustainable tourism; improve accessibility to employment, especially for local people; improve employment opportunities among Black, Asian, Ethnic and Minority groups; protect local employment land and uses; tackle the causes of worklessness; and provide additional housing near places of work.

### 5C16.1 Relevant Policy Objectives

#### National Level

5C16.1.1 The *National Planning Policy Framework 2012* makes clear that the Government is committed to securing economic growth in order to create jobs and prosperity and that the planning system does everything it can to support sustainable economic growth. Investment in business should not be overburdened by the combined requirements of planning policy expectations

#### Regional Level

5C16.1.2 Chapter 4 of the *London Plan (2011)* contains economic policies for London. Policies support mixed use developments and redevelopments of office space to improve competitiveness, including office based employment growth and floor space. Policies also support planned, monitored and managed release of surplus industrial land (Lambeth Borough is encouraged in the London Plan to adopt a more restricted approach to transfer of industrial land to other uses), and the support and enhancement of provision for arts, culture and entertainment.

5C16.1.3 The *Mayors Economic Development Strategy 2010* highlights the importance of extending opportunity to all Londoners and outlines actions to:

- tackle worklessness and get more Londoners into work
- address the root causes of low skills
- promote equality and tackle deprivation
- ensure more effective education, training and employment support for all
- help people get into work, stay in employment and progress in their career
- provide more personalised support and improve delivery.

## **5C16.2 Baseline conditions and existing issues**

- 5C16.2.1 There are around 10,000 businesses in Lambeth of which 75% have fewer than five employees. Over 99% of businesses in the borough are Small and Medium Enterprises.
- 5C16.2.2 Fourteen percent of Lambeth residents in employment work in professional, scientific and technical activities; 7.4% work in administration and support service activities; 2% work in manufacturing; and four percent in construction. Twenty percent of those in employment work in associate profession and technical occupations (Census 2011). Conversely, five percent of working age population has never worked, less than Inner London at seven percent (Census 2011).
- 5C16.2.3 There is evidence that ethnic minority groups are over-represented among NEETs (young people not in education, employment or training), and those with low skills, low wages and among the unemployed. The unemployment rate for ethnic minorities is 17%, based on Annual Population Survey results for April 2009 – March 2010. This is 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%) (Lambeth Council 2010).
- 5C16.2.4 The Borough suffers from relatively high rates of unemployment. Lambeth rate of unemployed for October 2012 was 5.6% of the population, this represents 11, 830 residents and is 1.4 percentage points higher than the London average of 4.2%. The current employment rate for the disabled in Lambeth is 46.3% compared to the not disabled which is 78.6% (Lambeth Council 2010). Amongst job seekers, 31% have no qualifications (Lambeth Community Fund Report 2010).
- 5C16.2.5 There are no strategic industrial locations in Lambeth and the borough's industrial areas are made up of Locally Significant Industrial Sites which are identified as Key Industrial Business Areas (KIBAs). The 27 KIBAs cover 47.61 hectares, ranging in size from 0.09 hectares (Lion Yard) to 7.28 hectares (West Norwood Commercial Area). There is a total of 387,995 square metres of commercial floorspace within Lambeth's KIBAs. KIBAs within the borough are performing well and whilst there has been an increase in vacant floorspace the overall proportion of vacant commercial premises has remained the same. Most KIBAs in the borough continue to have high occupancy levels (KIBA Survey 2012).
- 5C16.2.6 Commercial development completions in 2010/2011 were in various respects at or near an all time low since 2005/2006 when monitoring started. Gross overall completions were at the second lowest total ever including B1a (offices) and B8 (warehousing) with no B1c (light industry) or B2 (general industry) completions.
- 5C16.2.7 In terms of overall retail and leisure floorspace, Streatham is the largest town centre in the borough with almost 80,000 square metres of retail and leisure floorspace. There has not been a significant decline in overall floorspace in the town centre since 2002 however there has been a 15% decline in D2 (leisure) uses during this period.
- 5C16.2.8 Brixton is the borough's second largest centre and the only other major town centre. There has been an increase in the total amount of town centre floorspace between 2002 and 2011 of 8%. The amount of A1 floorspace in particular has increased by almost 15% during this period.

### 5C16.3 Likely evolution without the Plan

- 5C16.3.1 It is important that the Borough protects land used for employment uses. The provisions of the Core Strategy provide this protection however; in the absence of the Local Plan the Core Strategy is likely to be considered out-of-date and/or inconsistent with the NPPF. KIBAs may be lost to other land uses that may not be appropriate in the wider local context.

### 5C16.4 Assessment of Policies

#### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

D1 – Delivery and monitoring	ED15 – Employment and training
D2 – Presumption in favour of sustainable development	SI2 – New or improved community facilities**
D3 – Infrastructure	T1 – Sustainable travel
D4 – Planning obligations	T2 – Walking
H7 – Student housing**	T3 – Cycling
ED1 – Key Industrial and Business Areas (KIBAs)	T4 – Public transport infrastructure*
ED2 – Business uses outside KIBAs	T5 – River transport*
ED3 – Large offices	T8 – Servicing*
ED4 – Work-live development	T9 – Mini-cabs, taxis and private hire vehicles*
ED5 – Railway arches	EN4 – Sustainable design and construction*
ED6 – Town centres	Q5 – Environmental enhancement strategies
ED7 – Changes of use with town centres	Q18 – Advertisement panels and hoardings*
ED8 – Night time economy and food and drink uses	PN1 – Waterloo
ED10 – Betting shops, pawnbrokers and cash converters*	PN2 – Vauxhall
ED11 – Loss of retail uses (A class) outside town centres*	PN3 – Brixton
ED12 – Visitor attractions, leisure, arts and culture uses	PN4 – Streatham
ED13 – Hotels and other visitor accommodation	PN5 – Clapham
ED14 – Markets	PN6 – Stockwell
	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 – Herne Hill
	PN10 Loughborough Junction
	* SA 16 only
	** SA 18 only

#### ***Delivery and monitoring policies***

- 5C16.4.1 It is considered that policies D1 – D4 should result in positive effects on the local economy and tackling worklessness. In particular, Policy D1 seeks to support initiatives such as town centre partnerships, business improvement districts and other business networks and business led or neighbourhood management schemes in order to promote centres, attract inward investment and public realm improvements. Site specific planning obligations and the Community Infrastructure Levy (CIL) will be applied to developments to help deliver necessary infrastructure. Such infrastructure is necessary for the ongoing successful and sustainable future of new development, however the levy rate (£s per square metre) needs to be fair and carefully formulated to ensure development continues and remains viable to developers. The Preliminary Draft CIL Charging Schedule is currently available for public consultation and it is expected that the Lambeth CIL will be adopted by Autumn 2013. The draft CIL proposes affordable housing and buildings in operational use for charitable purposes to be exempt from CIL. This will help achieve positive impacts with regards to a number of SA Objectives, including health, equalities, housing, liveability, and will also contribute towards tackling worklessness by incorporating affordable housing in mixed use schemes.



***Housing policies***

5C16.4.2 The level of housing proposed for the Borough will help improve the local economy, by increasing the opportunity for the provision of local employment (e.g. construction) and training. However, delivery of housing, particularly by private house builders is uncertain due to current economic climate, and therefore housing delivery is uncertain in the short term. The student housing policy indirectly contributes to tackling worklessness by providing affordable accommodation for people studying.

***Economic development and town centre policies***

5C16.4.3 Policies ED1, ED2 and ED3 should result in significant positive effects for the local economy and tackling worklessness. The policies seek to maintain a stock of business and employment generating land in the borough, to help ensure local people have access to local jobs, employment and professional development. Protecting existing employment land in strategic areas will likely attract new enterprises to the Borough and will serve as a platform for future employment and economic growth. Mixed use development is also supported on sites outside of KIBAs where existing quantity of B use class is replaced. This will also assist in both improving the local economy and tackling worklessness by retaining or increasing employment generating land and offering residents opportunity for well-located accessible employment where living close to work is possible. Large scale mixed use development will also attract new enterprises to the Borough.

5C16.4.4 The new permitted development rights for change of use from B1 to C3 residential may result in loss of employment generating land / floorspace, dependent on the outcome of the Council's request for exemption (which is yet to be confirmed at time of writing). Similarly, the permitted change from B2 to B1 and B8 to B1 may also result in loss of employment land to residential use as a result of the imminent permitted development rights. It may prove necessary to amend Local Plan policies and/or supporting text to reflect this change in permitted development rights (e.g. policies ED1 – ED3), and ensure there are adequate measures to manage conflicts in amenity of housing one previously industrial or business land (particularly in KIBAs where existing B1(b), B1(c), B2 or B8 uses may remain) (policy Q2 Amenity may prove sufficient).

5C16.4.5 It is considered that where loss of employment generating land / existing large office space is proposed, the marketing element of the policies could be improved to ensure there is active and continuous marketing evidence over a one year period, and that it is marketed at an independently assessed market value price by an agent that specialises in the trade. Accordingly, it is recommended that policies ED2, ED3, ED7 and ED11 are strengthened to reflect this proposed amendment.

5C16.4.6 Previous recommendations suggested for policy ED4 work-live development, are further endorsed with respect to SA Objectives 16 and 18.

5C16.4.7 Policy ED5 use of railway arches creates opportunities for ingenious use of land and may attract new business growth in particular sectors appropriate to the unique environment, for example in the creative and cultural industries.

5C16.4.8 Policies ED6 and ED7 will likely result in significant positive effects on SA Objective 16 and 18. The policies seek to ensure town centres are lively and viable places for both consumers and business investors. Active frontages on ground floor level are required and the retail function of primary shopping areas will be maintained. Local shops, marketing areas and areas of specialist shopping are protected through policy ED6 and will help to support indigenous local business and diversification. Creating and delivering attractive and active town centres will help attract more inward

investment to such centres and the wider Borough.

- 5C16.4.9 The drive to maintain retail provision is strong. Primary shopping areas are identified for each town centre, and in these areas retail provision (A1) is encouraged. Change of use in these areas from A1 to other compatible uses for the function of the centre will be supported provided the proportion of retail (A1) units does not fall below 60 percent. This is to ensure that retail provision remains strong and town centres are not dominated by other A use classes, such as banks, pawn shops, betting offices, estate and employment agencies, and the range of food and drink establishments including restaurants, cafes, takeaways, pubs and bars.
- 5C16.4.10 It is considered that the policies (ED6 and ED7) positively contribute to liveability and prosperous local economy, particularly to provide local residents with daily needs and services. On the other hand, it may be argued that that control of retail provision should be managed through market demand, and requiring at least 60% of primary shopping areas as retail units may result in limited opportunities for prosperity and economic growth. It will be crucial that the extent of primary shopping area demarcation is robustly supported and continuously reviewed throughout the plan period, particularly with increased use of online shopping. Town centre boundaries are such that they include the primary shopping area but also other areas, whereby other A use classes may locate, and indeed are also necessary for an economically healthy and functioning town centre. Ensuring adequate retail provision (A1) in primary shopping areas is considered important for economic and social reasons. Development outside of the primary shopping area should rightly not undermine the role and functioning of the primary shopping area. Therefore, on the whole, and taking into account the ratio of primary shopping area within total town centre boundaries as illustrated on the Proposals Map, and the social benefits of successful town centres with good proportions of retail offer; it is considered that policies ED6 and ED7 should result in positive effects on the local economy and tackling of worklessness.
- 5C16.4.11 Policy ED8 on night time economy also provides strict standards for the number of proposals of food and drink uses outside of Waterloo and Vauxhall Opportunity Areas. Primary shopping areas should be protected and managed for precisely that – providing an adequate retail offer in order to sustain the backbone and vitality of the ‘high street’. However, outside of primary shopping areas it could be argued that allowing market forces to determine best use of land would be more beneficial for the local economy. Policy ED8(c)(ii) limits food and drink uses in these areas that would result in more than 2 in 5 consecutive premises. The effects of this policy are considered uncertain in terms of creating and sustaining prosperity and business growth. It is also uncertain how this policy will work in practice with policy ED10 which seeks to control A2 uses in town centres, particularly the proviso of no more than 2 in 5 consecutive premises (applicable to both food and drink and A2 uses). It is considered important that necessary provision and quality in food and drink offer is provided in town centres, especially so for those centres that accommodate or are earmarked to accommodate increased visitor attractions, and hotel developments.
- 5C16.4.12 Local Services Planning Bill HC58 enables local authorities to adopt policy so that planning permission is required for change of use of demolition away from a pub or a ‘local independent shop’ (to be defined) or if the change is to become a supermarket. Accordingly draft Local Plan policy may require review in light of this, and indeed supporting text paragraph 6.33 of policy ED11 requires updating.
- 5C16.4.13 Policy ED13 makes provision for hotel development and visitor accommodation in the Borough. Such accommodation need be located in areas of good public transport

accessibility, but also other amenities that visitors require, such as food and drink or banks. For this reason it is considered that visitor accommodation should be supported in town centres only, rather than 'elsewhere in the borough where public transport accessibility levels are 'good' or above'. It is considered that new visitor accommodation in town centres offers more sustainable offer than accommodation outside of town centres. It is recommended this is reviewed by the policy team.

5C16.4.14 Markets are supported in the Borough through policy ED14 and could help contribute to tackling worklessness. New markets are only supported where they do not harm existing shopping facilities or markets located in town centres, further enhancing and safeguarding the town centre retail offer.

5C16.4.15 Policy ED15 on employment and training should result in significant positive effects on SA Objective 16 and 18.

**Reasonable Alternatives**

*The RA identified for policy ED1 KIBAs included not having any KIBAs; allowing schools in KIBAs; allowing housing in KIBAs; and retaining KIBAs but reviewing boundaries based on the Employment Land Review and removing the exception of schools (as permitted by UDP). In terms of the local economy and worklessness, it is considered that these alternatives would adversely affect achievement of SA Objectives 16 and 18. The alternatives seek to reduce or eliminate land specifically designated for business use and loss of such land could have a detrimental effect on the local economy, particularly if such loss is not controlled.*

*The RA for policy ED2 Business uses outside of KIBAs is to allow loss of employment generating uses; not have the exception of loss for D1 uses; and increasing the length of time a site must be marketed for B1 use before allowing residential use. Again, in terms of SA Objectives 16 and 18, it is considered that not controlling loss of employment generating uses would lead to adverse impacts related to the economy and employment. The alternative of not allowing the exceptional loss of employment land for D1 uses would likely result in positive impacts for the economy, provided there is demand for employment and business generating land. In terms of economy and given the current recession it may be more beneficial to extend the length of time for marketing to ensure that the site is no longer suitable for employment generating uses, before allowing residential use into areas previously used for business or industrial uses (B1). However, equally retaining empty commercial or business sites for extended periods of time is not financially viable for landowners and the wider economy (for example much needed house building could spark localised economic growth).*

*The RA identified for policy ED5 railway arches is to only allow industrial uses and/or car parking in the arches. However the latter would be contrary to other Council policy on discouraging private vehicle car use. In terms of SA Objectives 16 and 18, it is considered that the proposed policy approach provides more positive effects for a more sustainable and prosperous economy than the alternative approach.*

*The RA for policy ED6 Town Centres is to not require re-provision on affordable terms for independent shop premises as part of major redevelopments. It is considered that this alternative would likely result in adverse impacts on SA Objective 18 as it could result in worklessness and liquidation / bankruptcy of locally owned and run business. The alternative is unlikely to result favourably in improved social performance of business. Loss of independent shop premises would likely reduce diversity, detract from a dynamic local economy and adversely affect communities socially. The analysis of centres in the Lambeth Retail Study demonstrates the important role independent traders play in providing diversity and maintain the health and vitality of centres.*

*The RA for policy ED7 is other variations of percentages for ground floor retail units in primary shopping areas. Too much retail in a town centre can adversely impact on other landuses such as food and drink uses, while too little retail component to town centres can adversely affect viability of town centres. An appropriate balance is required to maximise benefits for the local economy.*

*The RA identified for policy ED8 – Night time economy and food and drink uses would be to apply clause (c) to any major or district centre rather than just Waterloo and Vauxhall Opportunity Areas. This would mean there would be less control on the number of food and drink uses in major and district centres in the Borough. A further RA identified is to allow different percentage thresholds in different parts of the Borough. However this was dismissed as being too difficult/complex and had no supporting evidence base. Another alternative is to allow a higher percentage of food and drink uses on ground floor units in primary shopping areas (i.e. increased from 25% frontages). In terms of SA Objective 16, these alternatives may impact on town centre viability, and any proposed policy should be informed by robust and up-to-date evidence base. In terms of SA Objective 18, the alternatives may effectively tackle worklessness and the food and drink, and night time economy does employ significant numbers of people.*

*For policy ED9 – Hot food takeaways near schools the RAs identified were to not have a policy on this issue at all, or to apply it in town centres. It is considered the first alternative does not directly impact on SA Objectives 16 or 18. The second alternative may have a localised impact on the economy, but without further examination it is uncertain whether such impact would be significant.*

*The RAs identified for policy ED10 A2 uses is to apply different percentages in different areas of the Borough and/or vary the definition of 'over concentration' (being defined as 25%). These approaches were dismissed as too difficult and there is no supporting evidence base. A further alternative approach is to have a policy specifically on pawn brokers and betting shops. However, these are A2 uses and it would be difficult to enforce particular uses within the A2 use class.*

*The RA identified for policy ED15 skills and training was to require a financial contribution from developers for training schemes. However, this was dismissed as this would make the cumulative impact of policies unviable, and too onerous for the developer. If this could be a viable requirement in future, it is considered that such a financial contribution would have a positive impact with regards to SA Objective 18 in particular.*

*No RAs have been identified for policies ED3 and ED14.*

### **Social infrastructure policy S2**

5C16.4.16 Policy S2 will help tackle causes of worklessness as it exceptionally allows for the use of residential accommodation for childcare use or nursery provided specific tests are met, and elsewhere (but not within KIBAs) where the building is accessible among other criteria. Inadequate local childcare can be a cause of worklessness.

**Recommendation 166:** That policies ED2 (d), ED3(b) ED7(c) and ED11(a) are amended to ensure evidence is submitted that demonstrates active and continuous marketing evidence over a one year period, and that the site is marketed at an independently assessed market value price by a agent that specialises in commercial land sales.

**Recommendation 167:** that the policy team review the necessity of clause (c)(ii) of policy ED8.

**Recommendation 168:** that the policy team review Local Plan policies and supporting text in light of Local Services Planning Bill HC58.

**Recommendation 169:** That new visitor accommodation (ED13) is encouraged in town centres only, rather than 'elsewhere where PTAL is good or above'.

### **Transport policies**

5C16.4.17 Transport policies have very real potential to create significant positive effects for prosperity and economic growth in the Borough, as well as providing opportunity for rewarding and satisfying employment. Easy and accessible transport links both within the Borough and to outside the Borough are considered essential for improved

prosperity and economic performance of Lambeth as well as attracting more inward investment. The Borough has a variety of assets that attract people from outside the Borough, including tourism and educational facilities. Therefore, maintenance and improvement of transport infrastructure in the Borough is important for the attainment of SA Objectives 16 and 18 and considered critical for the Boroughs development. The policies should also assist in improving the social and environmental performance of businesses in the Borough (particularly policies T3, T6, and T8).

5C16.4.18 Uncertainties in securing funding and delivering public transport improvements such as a new station at Brixton providing access to the East London Line Extension has potential to adversely impact on the Boroughs local economy and effective achievement of SA Objectives 16 and 18.

***Environment and open space policies***

5C16.4.19 Policies EN3 (low carbon and renewable energy) and EN4 (sustainable design and construction) policies in particular will help improve the social and environmental performance of business. Some may argue that the policies cause additional financial burden to developers through incorporating low carbon technologies, achieving higher Code for Sustainable Homes and BREEAM levels and provision of living roofs and walls. However, it is considered that such costs are offset by the social and environmental benefits they provide, as well as reduced energy costs from running the business. In order the reduce costs to the developer, measures provided by policies EN3 and EN4 need to be incorporated into the very early stages of concept and design.

***Quality of built environment policies***

5C16.4.20 High quality well designed commercial buildings are attractive to prospective investors and therefore implemented appropriately, the policies will likely result in positive effects on the economic growth of the Borough, but also contribute towards a more satisfying environment for workers.

5C16.4.21 Policy Q5 seeks visual environmental improvements to encourage civic pride and attract inward investment in the borough. Advertisement panels and hoardings will be carefully managed through policy Q18, and renewal of existing advertisements and hoardings will be resisted where they have an adverse impact, particularly affecting heritage or in recognised regeneration areas. Tall buildings in appropriate locations provide additional business premises opportunities which should also contribute to the local economy. Overall, it is considered that all design policies will result in positive effects on the local economy.

***Places and neighbourhoods policies***

5C16.4.22 Significant positive effects on both SA Objectives 16 and 18 are expected from the Waterloo policy (PN1). The policy seeks to support employment opportunities for local residents and promote new training opportunities. The range of cultural and social infrastructure proposed will enable 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.

5C16.4.23 As another Opportunity Area, Vauxhall offers substantial benefits for regenerating the local area to maximise benefits for local economy and employment generating activities. Development of the new district centre is expected to create 8,000 new jobs, including construction jobs, which will provide a boost to the local economy and help tackle worklessness of local residents by providing the unemployed with

opportunities to be involved in the transformation of Vauxhall (implementation of policy ED15). The new town centre will provide a range of facilities and services all of which will contribute to attaining SA Objectives 16 and 18. However, such development also requires necessary social and physical infrastructure to support its growth, and such infrastructure will at least be part funded by developers through CIL and planning obligations. Overall, it is considered that regeneration of the Vauxhall area will result in positive effects on the local economy and improved employment rates.

5C16.4.24 Policy PN3 for Brixton will result in significant positive effects on SA Objectives 16 and 18 as it protects existing employment uses and seeks new opportunities such as in creative arts, theatre, cultural industries and green business. Mixed use development is encouraged and support is provided for markets and affordable business space for smaller organisations and individuals. Given the exceptional public transport accessibility of Brixton town centre, together with its breadth of shopping, food and drink, and entertainment offer; it is considered that visitor accommodation, particularly a hotel, may be appropriate in this town centre. It is recommended that the policy team review the appropriateness of a hotel for Brixton, as this is not specifically provided for in the policy.

5C16.4.25 Positive effects for the local economy and workless population should result from policy PN4 for Streatham. Regeneration that re-establishes its place as a destination for retail, leisure, hotels and commerce is supported by the policy. Reducing the length of the shopping centre is encouraged by the policy to help improve vitality, viability and local distinctiveness.

5C16.4.26 Clapham town centre has reached saturation point for food and drink uses, and therefore safeguarding and encouraging retail and other town centre uses is promoted. The policy supports creative, visual and performing arts and cultural sector, thus contributing to a more diverse economy. It is unclear how the extent of worklessness can be addressed given it is a smaller centre, however there is provision for street markets and community innovation, and the centre does provide a number of roles in hospitality.

5C16.4.27 Stockwell is a small district centre also, and is unlikely to deliver significant benefits to the local economy, although the policy does seek to encourage commercial, civic and other employment uses. It is unclear how worklessness will be tackled and it is expected that most residents of the local area will need to travel out of Stockwell for employment.

5C16.4.28 Policy PN7 for Oval seeks to improve the quality and extent of shopping and other appropriate town centre uses within the centre. The centre includes Kennington Business Park which is a KIBA and is therefore protected for its employment and business use.

5C16.4.29 Policy PN8 for West Norwood / Tulse Hill promotes retail-led mixed use development that includes start up accommodation for small businesses, and smaller retail units. A commercial area has been identified where commercially-led redevelopment is proposed to increase the range, quality and flexibility of business premises and encourage a variety of employment uses.

5C16.4.30 It is considered that development in line with policies PN7 and PN8 should provide limited access to employment for some local people although significant improvements are not likely to be expected. Causes of worklessness have not been addressed.

5C16.4.31 Herne Hill and Loughborough Junction policies seek to provide retail and appropriate town centre uses. The policy for Loughborough Junction states that access to employment should be within close walking distance to every home. Provided this is deliverable; this will help tackle worklessness in the local area. Creative industries are sought for Loughborough Junction, and use of railway bridges as a catalyst for change, if implemented appropriately, should result in a boost for the localised economy of the area. The policy indirectly seeks to tackle causes of worklessness by ensuring necessary services (like childcare) are within walking distance of homes. However, it is uncertain how effective the policy will be on tackling worklessness in this particular area.

**Recommendation 170:** that the policy team consider including hotel provision in the Brixton town centre policy.

## 5C16.5 Assessment of Sites

### Likely significant effects of implementing Site Allocations, taking into account mitigation

5C16.5.1 All sites in Table 59 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objectives 16 and 18.

**Table 58: Significance criteria for SA Objectives 16 and 18: Local Economy and Tackling Worklessness**

Positive	Negative
<ul style="list-style-type: none"> <li>• Provides appropriate, accessible land to support employment.</li> <li>• Actively supports the development of value added and low impact activities</li> <li>• Supports existing town and local centres.</li> <li>• Protects existing employment sites.</li> <li>• The allocation supports the provision of local employment in the borough.</li> <li>• The allocation supports provision of affordable childcare.</li> </ul>	<ul style="list-style-type: none"> <li>• Site poorly located with respect to services, facilities and accessibility of labour or customers.</li> <li>• Undermines or threatens existing centres or employment sites.</li> <li>• Development of the site may undermine provision of local employment or affordable childcare across the borough.</li> </ul>

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**TABLE 59: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVES 15 & 18: ECONOMY AND TACKLING WORKLESSNESS**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- Supports existing town and local centres.</li> <li>- The allocation supports the provision of local employment in the borough.</li> </ul>		
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	<ul style="list-style-type: none"> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
3	Vale Street Depot, Vale Street SE27	<ul style="list-style-type: none"> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
4	Elizabeth House, York Road SE1	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
5	Shell Centre, 2-8 York Road SE1	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
6	Waterloo Station, Waterloo Road SE1	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
7	Cornwall Road Bus Garage, Cornwall Road SE1	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		



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11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
12	Somerleyton Road SW9	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
13	Popes Road SW9	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
14	Brixton Central (between the viaducts) SW9	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
15	SW2 Enterprise Centre	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		
16	260 – 367 Norwood Road SE27	<ul style="list-style-type: none"> <li>- Provides appropriate, accessible land to support employment.</li> <li>- The allocation supports the provision of local employment in the borough.</li> <li>- Supports existing town and local centres.</li> </ul>		

**5C16.6 Summary of Local Plan policies and site allocations**

5C16.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have positive effects on the existing baseline and in providing employment and improving opportunities for prosperity and economic growth in the Borough.

**Table 60: Summary assessment of effects of draft Local Plan on economy and worklessness**

Assessment of effects of the Local Plan on SA objectives 16 & 18	Score (with out recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
<p>Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses</p> <p>And</p> <p>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>On the whole and taking into account the extent planning policy can offer all residents rewarding, well located and satisfying employment; and addressing the recommended changes as proposed above; it is considered that the Draft Local Plan will have significant positive effects on the SA Objectives and existing baseline conditions and key sustainability issues on employment and economy as outlined in Table 3. While the Borough does not have London Plan designated Strategic Industrial Land, the Local Plan does seek to maintain its stock of KIBAs and other employment generating and business use land. Policy ED15 seeks to upskill the local population and ensures local jobs, particularly associated with local development, go to local people. Many of the places and neighbourhoods policies make provision for a range of affordable and flexible workspaces to support local independent retailers, attract a range of different industries and make provision for start-up businesses. All Opportunity Areas and major town centres (including those close to areas of high deprivation) promote mixed use development and all site allocations support the provision of local employment in the Borough, support existing town and local centres and most provide appropriate, accessible land to support employment.</p> <p>However, there is some uncertainty whether the strong retail drive of town centre (e.g. policy ED7) will result in significant positive effects, especially during times of economic hardship. In particular, there is some uncertainty over the sustainability of controlling A3, A4, A5 premises outside of primary shopping areas and the relationship of this to policy ED10 which seeks to control A2 uses. There is also some uncertainty on the effect the A2 policy (ED10) may have on the local economy, and also delivery of critical transport infrastructure in a timely manner and its impact on the local economy, attracting inward investment, and improving access for local people to employment opportunities.</p> <p>The economy is currently trying to recover from a double dip recession and avoid a triple dip recession. Accordingly development of key sites and areas may be delayed until there is more certainty of the economy at all scales: regional, national, European and global.</p>	<p>Positive effects on the local economy will be evident in the short term through opportunities related to construction of new developments, particularly in Opportunity Areas. Positive effects will likely continue in the mid to long term as developments are occupied both through occupied business/office space, but also through increased population supporting town and local centres. Redevelopment of other areas may be slower due to the current economic recession. Economic growth in rejuvenated town centres like Brixton and Streatham is likely to be seen incrementally over the plan period with cumulative benefits apparent in the medium to long term. Increases in the number of A1 retail premises will probably correspond to changes in the current recession, and therefore the positive effects on the Borough's economy will likely be evident in the medium term.</p>	<p>Permanent</p> <p>Temporary effects associated with lack of activity possible while the economy recovers from double dip recession.</p>

**5C16.7 Recommendations for monitoring likely significant and uncertain effects**

5C16.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Unemployment rates
- Number of businesses registered in the Borough
- Number of vacant premises in town centres
- Annual update of infrastructure schedule

## **5C17. REGENERATION AND EFFICIENT USE OF LAND**

5C17.0.1 This section of the SA relates to the sustainability performance of the Local Plan against:

Objective 17: 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.

5C17.0.2 To achieve this objective, plan policies should maximise regeneration benefits to the most deprived areas and communities; promote the efficient, innovative and multifunctional use of land; ensure the provision of adequate quantities and type of public realm; and protect the Borough's soil resource.

### **5C17.1 Relevant policy objectives**

#### National Level

5C17.1.1 *National Planning Policy Framework 2012* states that policies should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value. Multiple benefits from the use of land and mixed use development should be promoted. Empty housing and buildings in line with local housing and empty homes strategies should be brought back into residential use.

#### Regional Level

5C17.1.3 The *London Plan (2011)* contains a number of policies applicable to regeneration schemes. For example policy 7.9 – Heritage Led Regeneration - states that regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. Similarly open space provision should be included in regeneration schemes.

### **5C17.2 Baseline conditions and existing issues**

5C17.2.1 The London Borough of Lambeth is a dense urban district that is largely residential in nature. There are designated areas of open space, key industrial and business areas and town centre / major / district shopping designations.

5C17.2.2 There is currently a number of regeneration projects in the Borough:

- Clapham Old Town;
- Lower Marsh Regeneration Project;
- Streatham and West Norwood High Streets;
- Shell Centre site Masterplan;
- Vauxhall Nine Elms / Battersea Opportunity Area;
- Waterloo Opportunity Area; and
- Future Lambeth projects:
  - Future Brixton;
  - Future Clapham;
  - Future Kennington;
  - Future Norwood; and
  - Future Streatham

5C17.2.3 The Regeneration Delivery Plan Update 2010 provides further detail on priority projects as well as an update on actions.

### 5C17.3 Likely evolution without the Plan

5C17.3.1 In the absence of the Local Plan, regeneration will likely continue however; local specific guidance and detail (relating to a raft of place making measures like design, sustainable transport, accessibility, community facilities etc) will be lacking and as such regeneration may be delivered in a less co-ordinated and less cohesive manner. Development may be brought forward that is not appropriate for the local context (for example overconcentration of student housing or fewer affordable housing).

### 5C17.4 Assessment of Policies

#### Likely significant effects of implementing the proposed Local Plan policies as a whole, taking into account mitigation

5C17.4.1 The main policies relevant to achievement of the SA Objective are:

D1 – Delivery and monitoring	T7 – Parking
D2 – Presumption in favour of sustainable development	T10 – Telecommunications
D3 – Infrastructure	EN1 – Open space
D4 – Planning obligations	EN2 – Local food growing and production
H1 – Maximising housing delivery	EN4 – Sustainable design and construction
H2 – Delivering affordable housing	EN5 – Flood risk
H3 – Safeguarding existing housing	EN7 – Sustainable waste management
H4 – Housing mix in new developments	Q5 – Environmental enhancement strategies
H7 – Student housing	Q7 – Urban design / public realm
H10 – Gypsy and Traveller needs	Q8 – Urban design / new development
ED1 – Key Industrial and Business Areas (KIBAs)	Q10 – Landscaping
ED2 – Business uses outside KIBAs	Q18 – Advertisement panels and hoardings
ED3 – Large offices	Q21 – Statutory listed buildings
ED4 – Work-live development	Q23 – Conservation Areas
ED5 – Railway arches	Q27 – Tall buildings
ED6 – Town centres	PN1 – Waterloo
ED7 – Changes of use within town centres	PN2 – Vauxhall
ED11 – Loss of retail uses (A class) outside town centres	PN3 – Brixton
SI1 – Safeguarding existing community facilities	PN4 – Streatham
SI2 – New or improved community facilities	PN5 – Clapham
SI3 – Schools	PN6 – Stockwell
T1 – Sustainable travel	PN7 – Oval
	PN8 – West Norwood / Tulse Hill
	PN9 – Herne Hill
	PN10 – Loughborough Junction

#### ***Delivery and monitoring policies***

5C17.4.2 Policy D1 ensures the Council will work with a range of partners to explore regeneration opportunities, and that use of brownfield land and vacant buildings are maximised. Developments will be supported by appropriate green, social and physical infrastructure as provided by policies D3 and D4. Delivery of such infrastructure will help ensure efficient use of land and successful regeneration projects. It is likely that policies D1 – D4 will result in significant positive effects on SA Objective 17 as they seek to maximise previously used land, and tackle areas of deprivations (i.e. identified regeneration areas and town centres).

#### ***Housing policies***

5C17.4.3 Housing policies promote new housing delivery and estate renewal and regeneration schemes. Proposals that bring back into use long-term empty homes and derelict homes are supported by policy H3. All housing developments will need to incorporate affordable housing provision, and a range of dwelling sizes, which should provide

regeneration benefits to deprived areas and communities, particularly for overcrowded households. Policy H10 on gypsy and traveller needs ensures new sites are economically, socially and environmentally sustainable and it is considered that the criteria for new sites seek to maximise benefits for this community.

***Economic development and town centre policies***

- 5C17.4.4 While policy ED1 does not promote the multifunctional use of land in its widest sense (KIBAs), the policy ensures a stock of sites is maintained in the Borough for business and employment generating uses which provide other key social and economic benefits to the Borough and residents. Policy ED2 also seeks to maintain the stock of sites and premises in business use outside of KIBAs, but allows for mixed use development where the existing quantity of B class floorspace is replaced or increased. Accordingly policy ED2 promotes efficient, innovative and multifunctional use of land.
- 5C17.4.5 Generally, the draft Local Plan seeks to protect sites and premises currently in business or employment generating use. Change of use or redevelopment is generally supported where certain tests are met and supported by marketing evidence and independently validated viability assessment. One requirement is that sites are marketed over a one year period. It is considered that this is an efficient approach to land use management, while seeking to meet economic objectives for the Borough.
- 5C17.4.6 Policy ED4 of work-live development states that change of use of work-live accommodation to residential use will not be permitted. This seems inconsistent with other policies (particularly ED2 and ED3, and housing delivery objectives) as the policy makes no allowance for marketing evidence that demonstrates no demand for the work element of the work-live accommodation. It also may be considered as an inefficient use of land, particularly if there is no demand for the work component of an existing work-live site, when there are other issues facing the borough such as supply of larger family size homes. The policy would benefit from supporting text. It is recommended that the policy is reviewed by the policy team with reference to regeneration, efficient use of land, and housing objectives.
- 5C17.4.7 It is considered that use of railway arches is an efficient use of land resource. Town centre policies also support efficient use of land by providing for a range of uses. As previously highlighted, residential use above ground floor is not specifically provided for in the town centre policies. It is considered that allowing for residential use above ground floor in town centres would offer a more efficient use of land resource. While policy ED7(c) may allow for residential use above shops, subject to marketing criteria; it is considered that policy ED6(a) could promote residential uses in town centres. This will complement places and neighbourhood policies that provide for mixed use development in their respective town centres.

**Recommendation 171:** that policy ED4(c) is reviewed to allow for change of use from work-live to residential, subject to marketing evidence.

**Reasonable Alternatives (RAs)**

*The RA identified for policy ED1 KIBAs included not having any KIBAs; allowing schools in KIBAs; allowing housing in KIBAs; and retaining KIBAs but reviewing boundaries based on the Employment Land Review and removing the exception of schools (as permitted by UDP). In terms of SA Objective 17; it is considered that loss of KIBAs may not necessarily maximise benefits to most deprived areas and communities if this results in loss of employment for local residents. However, loss of unused or underused KIBAs to other uses may prove a more efficient use of land at least in the short term, but may not prove sustainable economically or socially in the long term. Allowing housing or schools in KIBAs gives rise to conflicts in amenities / reverse sensitivity issues / bad neighbour uses which may have adverse impacts on residents and school children.*

*The RAs for policy ED2 Business uses outside of KIBAs are to allow loss of employment generating uses; not have the exception of loss for D1 uses; and increasing the length of time a site must be marketed for B1 use before allowing residential use. In terms of SA Objective 17, loss of employment generating land or floorspace is unlikely to benefit most deprived areas and communities. Similarly, not allowing the exception for local community or cultural uses (where there is an identified need) is unlikely to benefit deprived communities and areas. Increasing the length of time for marketing may delay regeneration when it is clear there is no demand for business use on sites. In these situations, increasing the marketing time would be contrary to SA Objective 17.*

*The RA identified for policy ED5 railway arches is to only allow industrial uses and/or car parking in the arches. These limited uses of the arches are not considered the most efficient or innovative uses of railway arches which could otherwise be used for a wider range of uses (including creative arts) that would be more beneficial to local communities, particularly those seeking regeneration.*

*The RA for policy ED6 Town Centres is to not require re-provision on affordable terms for independent shop premises as part of major redevelopments. It is considered that this alternative would likely result in adverse impacts on SA Objective 17 as it does not maximise benefits to most deprived area and communities who may rely on such independent shops for particular local services / goods.*

**Social infrastructure policies**

- 5C17.4.8 Policies S1 – S3 should result in positive effects on SA Objective 17. Existing community premises are to be safeguarded for the most efficient use of the premises addressing changing needs and priorities of the community. Proposals for large residential schemes and comprehensive estate regeneration will need to ensure appropriate provision for social infrastructure and local shops, which will help maximise regeneration benefits to the most deprived areas and communities. New or improved community premises need to be flexible, adaptable and sited to maximise shared community use of premises. The schools policy promotes the shared use of schools for wider community use, which also demonstrates a means to improving efficiency in land use.

**Transport policies**

- 5C17.4.9 Good accessibility across the Borough, particularly by public transport, walking and cycling is an important part of successful regeneration of areas as it provides accessibility to local services and facilities, employment and education opportunities. Transport policies also provide for adequate provision of public realm for walking and cycling which should maximise regeneration benefits to deprived areas and communities of the Borough. Parking policy T7 seeks to maximise efficient use of land by requiring car parking provided as part of shopping / leisure development in Opportunity Areas and town centres to service the whole area / centre rather than just the new development. Similarly, flexible shared use of car parking should be provided in mixed use developments.

**Environment and open space policies**

- 5C17.4.10 Open space policies should result in positive impacts on regeneration and efficient use of land. Provision of (and access to) open space is necessary for healthy communities, but also plays important multifunctional roles such as flood management, biodiversity, improved air quality, food growing, leisure and sport. For

these reasons, open space in its own right is an efficient use of land and protection of existing open space is critical. Policy EN1 also seeks to create areas of new open space, particularly in areas of open space deficiency and therefore open space will form an important component of regeneration projects. Policy EN2 promotes food growing spaces. Recommendation 26 on encouraging food growing in other appropriate developments (not limited to residential) is further endorsed with regards to efficient use of land and sustainable living.

5C17.4.11 Code for Sustainable Homes and BREEAM assessment tools provide credits for building reuse and Brownfield development. All regeneration will need to comply with the requirements of policy EN4 on sustainable design and construction, and should help maximise regeneration benefits in deprived areas and communities, particularly through improved health outcomes and lower energy bills from improved energy efficient design and construction. The policy also promotes use of living roofs and walls which provide a range of benefits, both to occupants of buildings and the environment through improved air quality and biodiversity, demonstrating multifunctional use and benefits of land and buildings.

5C17.4.12 Flood risk policy EN5 seeks to steer development towards areas of lowest flood risk and encourages use of sustainable drainage systems, further demonstrating multifunctional use of land. Policy ED6 on sustainable drainage systems and water management also endorses this approach but also supports water efficiency measures including rainwater harvesting and greywater recycling further ensuring developments promote efficient use of land. Policy EN7 on sustainable waste management supports the waste hierarchy, which if implemented appropriately will result in reduced quantities of waste to landfill, thereby contributing to protection of soil resource (outside of the Borough).

**Reasonable Alternatives (RAs)**

*The RA for policy EN2 is to not have a policy on food growing. It is considered this would be a lost opportunity with regards to SA Objective 17 provided that space for food growing is incorporated in a way that does not diminish efficient use of land. The RA identified for policy EN3 is to provide Lambeth specific targets. However this was dismissed as there is no evidence base to support local targets. No RAs have been identified for policies EN1 and EN4.*

**Quality of built environment policies**

5C17.4.13 Implementation of policy Q5 will deliver environment improvements which will stimulate and/or maximise regeneration benefits in the Borough, and will likely be particularly evident in areas of environmental blight. However, it is unclear whether the policy promotes reuse of buildings. Clause (ii) of the policy could be strengthened to ensure re-use of existing buildings and land, as follows:

‘(ii) enhancement and re-use of dilapidated / derelict buildings and spaces;’

5C17.4.14 It is considered that urban design policies on both public realm and new developments should result in positive effects on SA Objective 17, particularly in maximising regeneration benefits by ensuring long-lasting gains and provision of adequate quantities and type of public realm. Landscaping of developments should avoid left-over spaces, and this seeks to ensure all land is put to some sort of use, whether useable open space, biodiversity, soft planting.

5C17.4.15 The draft Local Plan contains policies that seek to bring heritage assets back into viable use and good repair (policies Q19 and Q21). Policy 23 for conservation areas seeks to preserve or enhance the character or appearance of the areas. However, demolition in a conservation area will be supported subject to specific criteria being



met. The criteria do not include demonstration that the building cannot be viably enhanced or improved for re-use. The policy team may wish to consider including this as an additional check to clause (b) as this will help support policy D1 which seeks to re-use buildings, and help attain SA Objective 17, as well as other objectives such as SA Objective 13 on waste, and SA Objective 8 on historic environment.

5C17.4.16 Tall buildings (policy Q27) can maximise use of the land resource and provide opportunity for multifunctional use of land. Potential adverse effects associated with tall buildings (such as dominance, shading, reduced privacy) need to be managed.

**Recommendation 172:** that the policy team review policy Q5(ii) and determine the appropriateness of encouraging re-use of dilapidated / derelict buildings and spaces.

**Recommendation 173:** the policy team consider amending policy Q23 on conservation areas so that demolition is only permissible where it has been demonstrated that the building cannot be viably re-used or refurbished for functional / intended use.

#### ***Places and neighbourhoods policies***

5C17.4.17 Overall, it is considered that the places and neighbourhoods policies should result in significant positive effects on regeneration and efficient use of land. This is because policies seek positive change to previously developed land and existing buildings. However, it should be noted that the policies apply to sites within town centre boundaries, and therefore may not result in direct regeneration benefits to the most deprived communities in terms of where they live, but it is considered that redevelopment of town centres may stimulate regeneration in these other areas. Policies for Waterloo, Vauxhall, Brixton, West Norwood / Tulse Hill and Streatham provide for taller buildings which offer opportunities for multifunctional and efficient use of land. Policies for Waterloo and Vauxhall promote development in line with their respective Opportunity Area Frameworks and Central Activities Zone (CAZ) designations. While redevelopment of these areas will benefit the borough, it is unlikely to impact directly on the most deprived areas and communities of Lambeth, although public realm improvements particularly for walking and cycling may improve accessibility opportunities and integration with adjacent deprived areas. Conversely, policy PN3 on Brixton town centre focuses on much needed sensitive and sustainable regeneration in an area of high deprivation. The policy supports innovative opportunities, including creative arts and green sectors, and promotes improvements to public realm. In focusing development in the existing centre and on previously developed land it should contribute to the protection of the Borough's soil assets and land resource.

5C17.4.18 Mixed use developments are proposed for all major centres and public realm improvements are provided for in all of the policies PN1- PN10. As highlighted above, such improvements may help stimulate regeneration in other adjacent deprived areas. Policy PN5 on Clapham, policy PN7 on Oval both seek retention (and reuse) of specific buildings. Policies PN6 for Stockwell and PN8 West Norwood / Tulse Hill include improvements to housing estates which will benefit this deprived area and community. Loughborough Junction is one of the most deprived areas in the Borough, and the policy seeks to address this through positive regeneration that results in clear identity, increased sense of pride, high quality design, improved transport links, and using the railway bridges as a catalyst for change.

**5C17.5 Assessment of Sites**

**Likely significant effects of implementing Site Allocations, taking into account mitigation**

5C17.5.1 All sites in Table 62 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 17.

**Table 61: Significance criteria for SA Objectives 17: Regeneration and Efficient Use of Land**

Positive	Negative
<ul style="list-style-type: none"> <li>• Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations.</li> <li>• Site located within London Plan Area for Regeneration.</li> <li>• Allocation promotes high standards of sustainable design and construction, including provision/protection of public realm and the borough's soil resource.</li> </ul>	<ul style="list-style-type: none"> <li>• Greenfield site which is sensitive in terms of ecology, agriculture or/and amenity.</li> <li>• Allocation involves regeneration or development proposals that are not within London Plan Area for Regeneration (where potential exists unmet on areas for regeneration elsewhere in the Borough).</li> </ul>

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**TABLE 62: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 17: REGENERATION**

#	Site	Strengths	Weaknesses	Potential Mitigation
1	Land north and south of and including 10 Royal Street (Founders Place)	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm		
2	47 – 51 Acre Lane, and land rear of Sudburne Road SW2	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm	- possible soil contamination issues from previous use as petrol station	- soil testing and cleansing
3	Vale Street Depot, Vale Street SE27	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations.		
4	Elizabeth House, York Road SE1	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area		
5	Shell Centre, 2-8 York Road SE1	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area		
6	Waterloo Station, Waterloo Road SE1	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area		
7	Cornwall Road Bus Garage, Cornwall Road SE1	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area		
8	8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area		
9	Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm		

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		- site within London Plan Opportunity Area		
10	Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area		
11	Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area		
12	Somerleyton Road SW9	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm		
13	Popes Road SW9	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm		
14	Brixton Central (between the viaducts) SW9	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm		
15	SW2 Enterprise Centre	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm		
16	260 – 367 Norwood Road SE27	- Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm		

## 5C17.6 Summary of Local Plan policies and site allocations

5C17.6.1 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is considered that the Local Plan seeks efficient use of land resource and stimulates regeneration that maximises benefits to the most deprived areas and communities.

**Table 63: Summary assessment of effects of draft Local Plan on regeneration**

Assessment of effects of the Local Plan on SA objective 17	Score (without recommendations)	Score (with recommendations)	Justification of Score	Timescale and probability	Permanent or temporary
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>Overall it is considered that the Local Plan provides the policy framework to allow regeneration that maximises deprived areas and communities and improves efficiency in land use through re-use of existing buildings and land.</p> <p>The Plan promotes multifunctional use of land in many areas through mixed use developments. Regeneration of underused or vacant areas is an efficient use of the land resource. All places and neighbourhoods policies promote public realm improvements and while these are proposed for town centres it is considered that such improvements can also stimulate regeneration of wider areas. Public realm improvements will also result in improved accessibility of the wider area, and thereby benefit wider communities including most deprived areas/communities. Specific policies targeting more deprived areas for example Brixton and Loughborough Junction seek to stimulate sensitive regeneration, which will result in wide ranging benefits to for local communities.</p> <p>All site allocations are for brownfield land, and some also seek to reuse / bring back into more efficient use existing buildings.</p>	<p>Regeneration in Opportunity Areas is already occurring and will likely continue into the long term.</p> <p>Regeneration of other places and neighbourhoods and site allocations will likely occur in short term for some sites (that already have planning permissions) and between mid to long term relative to the economic climate.</p> <p>Smaller scale improvements, for example minor public realm improvements may already be evident in some areas or otherwise will likely be evident in the short term.</p>	Permanent.

## 5C17.7 Recommendations for monitoring likely significant effects

5C17.7.1 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Number of existing vacant or dilapidated / derelict buildings brought back into use
- Number of regeneration projects completed in deprived areas.

## 6 SUMMARY AND CONCLUSIONS

### 6.1 The Local Plan

- 6.1.1 A new Local Plan for Lambeth is proposed, to incorporate 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 will not change (other than factual updating), as they are recently developed and adopted. Accordingly previous SA analysis, including reasonable alternatives on the spatial strategy. Spatial vision, strategic objectives and most strategic policies remains relevant. However, a limited number of strategic policy areas in the Core Strategy will be reviewed to ensure compliance with the National Planning Policy Framework (March 2012) and the London Plan 2011 and to reflect recent updates to the council's strategies for housing, economic development and infrastructure delivery, plus new work on Brixton and Vauxhall.
- 6.1.2 The Local Plan sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and identifies sites for development within Lambeth to cover the period up to 2030. It is based on the social, economic and environmental objectives of the Lambeth Sustainable Community Strategy together with other important strategic development needs such as employment, retail, leisure, community, public services, transport as well as mitigating and adapting to the effects of climate change.
- 6.1.3 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. 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.
- 6.1.4 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.
- 6.1.5 Lambeth is a very diverse Borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is among the most densely populated local authority in England, with over 11,300 people per km<sup>2</sup>. Lambeth's population is 303,100, which makes it the third largest population in inner London, after Newham (308,000) and Wandsworth (307,000) (Census 2011). The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity.
- 6.1.6 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. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. Access to public transport is good in north and central Lambeth however; residents in Streatham and West Norwood are dependent on rail and bus connections. As Lambeth has the lowest car ownership rate in London, there is even more reliance on public transport.

- 6.1.7 The Local Plan sets out the strategic approach to planning for development in the Borough up until 2030/2031. The spatial strategy assumes a high level of continuous growth over the plan period that seeks to exceed London Plan target of at least 17,925 additional dwellings in Lambeth over the period 2011-21. The strategy sees retention of all 26 Key Industrial Business Areas as well as maintains a stock of sites and premises in business and employment generating *sui generis* uses. A key difference between the Core Strategy and the new Local Plan is that the exception to the protection of KIBAs to provide sites for schools is no longer available. Affordable housing also remains a priority, and it is now proposed that developments of less than 10 new homes make a financial contribution towards affordable housing provision. Policies seek to avoid single use areas of student housing; rather criteria has been developed to assess proposals for student housing and being part of mixed use developments and linkage to a college of university are two such criterion.
- 6.1.8 Changes in the approach to some policies affecting town centres are also proposed. For example, the Local Plan proposes at least 60 percent of primary shopping frontage should be shops (an increase from 50% in the Core Strategy). The Local Plan also seeks to address concerns that too many betting shops, pawn brokers and money shops are adversely affecting vitality and viability of town centres. A new policy is introduced that seeks to limit these A2 uses in the same way as food and drink premise are limited. Outside Waterloo and Vauxhall the Plan proposes that no more than a quarter of units in the heart of town centres are used for night-time food and drink venues. Childhood obesity is tackled through the inclusion of a new policy restricting hot food takeaways outside of town centres but within 400m of a primary or secondary school.
- 6.1.9 Place specific policies that reflect distinctive characters are provided for each of the town and local centres. Policies identify the types of development appropriate for each centre, including building form and height; landuse and public realm. They reflect visions and aspirations of area-based plans already underway (for example Vauxhall SPD, Brixton SPD, Waterloo SPD); the Loughborough Junction policy has been co-produced with the Loughborough Junction Action Group.
- 6.1.10 The sustainability appraisal process has identified a number of recommendations to each of these policy areas in order to strengthened policy approach with respect to sustainability objectives. Appendix X tabulates all SA recommendations alongside Local Plan policies.
- 6.1.11 The Local Plan makes provision for new housing that will be of an appropriate housing mix, type and size to enable social inclusion, mixed use communities and the ability to remain in a community for a life time if so desired. Housing will be well designed both individually and with other buildings and the surrounding environment and all developments will need to incorporate affordable housing.
- 6.1.12 The Plan seeks to deliver community services and facilities that are accessible to everyone. Provision is made for additional community services and facilities to support projected population growth. These will be located and designed to increase accessibility regardless of age, gender, disability, ethnicity or faith and to maintain and improve community, culture, leisure and recreational activities available in the Borough. For example, family housing should normally have direct access to a garden; residential developments of 10 or more children will need to incorporate children's play area; new developments will need to provide sufficient open space, especially in areas currently deficient of accessible open space; and intensive uses such as schools, shops, social infrastructure should be located close to public

transport, cycling and pedestrian nodes, reducing the need to travel by car.

- 6.1.13 The Borough's natural, cultural and archaeological heritage is well provided for in the Local Plan. Views to the World Heritage Site as well as the vast number of Conservation Areas, listing buildings and their settings, archaeology, and open green spaces will be appropriately protected during the plan period.
- 6.1.14 Developments will be well designed both socially in terms of social inclusion, accessibility, safety and reduced fear of crime; and environmentally, in terms of water efficiency, waste management and recycling, climate change adaptation, improved air quality and efficient use of natural resources including land.
- 6.1.15 On the whole, it is considered that the Local Plan has been produced with the premise of sustainable patterns of urban development actively borne in mind. Sites earmarked for future comprehensive redevelopment are in locations that have potential to facilitate efficient accessibility to both areas within and outside of the Borough.
- 6.1.16 However, it is considered that deliverability is a key issue for the Draft Local Plan. Significant growth is proposed for the borough, in terms of new housing, new business space as part of mixed use developments and associated population growth. Such growth will only be successful and sustainable if appropriate infrastructure is delivered to support such growth. For example significant redevelopment in Vauxhall is going to require additional improvements to public transport infrastructure in particular addressing capacity and accessibility. The Northern Line extension to Nine Elms is proposed to alleviate overcrowding issues on the northern line and provide accessible public transportation however funding had not yet been secured for the project. It is also likely that population growth will proceed any new public transport infrastructure, as developments are completed and occupied.
- 6.1.17 Reasonable alternatives have been identified for some policies, particularly for policies that had a change in approach from adopted Core Strategy policy. The SA has provided assessment of the reasonable alternatives for each of the Sustainability Objectives.

## **6.2 Sustainability Effects**

- 6.2.1 Overall, and in so far as planning can influence particular areas, it is considered that the Draft Local Plan provides the policy framework to generally result in positive effects for the Borough but uncertainty in deliverability of key infrastructure is a concern. Table 64 shows the sustainability effects of the Plan for each SA Objective.



**Table 64: Summary of SA scores**

SA OBJECTIVE	SA SCORE without recommendations	SA SCORE with recommendations
1. Ensuring safe communities with reduced crime and disorder	+/?	++
2. Promoting a healthy borough with better health care services, reduced healthy inequalities and by reducing the causes of ill health	+/?	++
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	++/?	++/?
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	-/+/?	++/?
5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	+/?	+/?
6. Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	+/?	++/?
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.	+/?	++/?
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.	+/?	++/?
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.	++/?	++/?
10. To conserve and enhance biodiversity, and bring nature closer to people	+/?	++
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	+/?	+/?
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.	-/+/?	+/?
13. 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. To improve air quality	+/?	+/?
15. To maximise the education and skills levels of the population	+/?	+/?
16. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	++/?	++/?
17. 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. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++/?	++/?

6.2.2 175 recommendations have been made in this SA. Recommendations have been made where appropriate to improve the sustainability effects of the Draft Core Strategy. In some cases this has resulted to a change of effect from negative to positive (for example SA Objective 4, whereby flood defences need remain in good

condition (original policy inadvertently allowed defences to get to poor condition)). Some recommendations see an improvement to policy that results in a minor positive effect becoming a significant positive effect in the context of the SA Objective (for example, improvements in sustainable design and construction standards likely to result in better health outcomes; strengthened provisions for living roofs and walls, clarification that biodiversity generally should be protected rather than just identified areas with biodiversity status, and a net increase in trees which will likely result in significant effects of biodiversity as well as other SA Objectives such as health, liveability and sustainability of built environment. Recommendations have also been included that improve clarity and interpretation of the draft Local Plan.

- 6.2.3 It is important to note judgements were made taking into account the draft London Plan directive on the Borough in terms of growth; and the extent to which local planning policy can play a part at attaining the SA Objective. For example, the effects of the Draft Local Plan on SA Objective 2 – promoting a healthy borough with better health care services, reduced healthy inequalities and by reducing the causes of ill health – was assessed to result in significant positive effects to the Borough. Obviously health is influenced by a number of other, more direct factors and organisations, such as the establishment of hospitals and the NHS; but it was considered that the extent to which the Local Plan can play a role in attaining SA Objective 2, led to significant positive effects.
- 6.2.4 For some of the SA Objectives, the Draft Local Plan has resulted in uncertain effects. These primarily relate to deliverability both of necessary infrastructure to support projected growth (especially transport infrastructure such as timing of Northern Line extension, and new station at Brixton for East London Line Extension), but also house building, particularly in the short-term as the country struggles out of a double dip recession to avoid a triple dip recession. There is also some uncertainty of the sustainability of controlling A3, A4, A5 premises outside of primary shopping areas, and also the effects policy ED10 on A2 uses may have on the local economy.

### **6.3 Conclusions**

- 6.3.1 Taking into account the findings of the SA, it is considered that the Draft Local Plan sets out a positive framework for the future development of Lambeth, in light of the London Plan requirements assigned to the Borough. It is considered that the Draft Local Plan successfully achieves a balance between the need to protect the natural environment, with meeting social and economic needs.
- 6.3.2 The Draft Local Plan aims to achieve high standards in the quality of development and contains many provisions that seek to mitigate or avoid adverse effects on the natural environment. It is considered that the impacts of the scale, type and level of development proposed in the Local Plan will not give rise to significant adverse effects on biodiversity, landscape, historic environment and natural resources, provided the recommendations outlined in the SA are incorporated into the final version of the Local Plan.
- 6.3.3 Generally, all site allocations perform well against SA Objectives however it is considered that given the quantum of development proposed, there could be some policy guidance of the type of low carbon technologies expected for each site, particularly if these are close to town centres earmarked for district heat networks. It is unclear why some site allocations refer to carbon emission reduction and climate change adaptation, and other sites do not. Living roofs and walls should be included as key design considerations on most, if not all, site allocations.
- 6.3.4 Overall, it is considered that the Draft Local Plan provides a spatial and policy

framework that is largely in accordance with sustainable development principles, but with a small number of areas where it is uncertain whether sustainability objectives will always be achieved.