

Matter 2 – Spatial strategy, vision and objectives

2.1 Spatial strategy

- (i) *The Council has indicated that in relation to paragraph 22 of the Framework, its housing policies are considered to be strategic, and the plan period for the Plan is therefore 15 years (2020-2035). The Plan provides a ten-year housing provision in line with the London Plan. Is this approach justified, and in accordance with national policy? Or should the Plan make an indicative housing provision for the remaining five years of the plan period (years 11-15)? This latter provision could perhaps be made along the lines indicated in Topic Paper 10 (Housing Provision Statement), which suggests an indicative capacity for years 11-15 from 16 large sites in the order of 2,650 additional dwellings, plus a possible continuation of the small sites allowance.*

The Council is happy to include in the Plan an indicative housing provision for years 11-15 of the plan period along the lines indicated in Topic Paper 10a Housing Provision Statement ([TP10a](#), as updated October 2020).

Please see also the potential change to the wording of paragraph 3.3 agreed in the statement of common ground with the Mayor ([SCG01](#)) and listed in the schedule of potential changes ([SD17a](#)) as PC010.

- (ii) *Should the Plan set out and address the London Plan's Opportunity Areas (OAs), at Vauxhall/Nine Elms/Battersea and at Waterloo and reflect the indicative targets, for 18,500 new homes and 18,000 new jobs at Vauxhall/Nine Elms/Battersea and 6,000 new jobs at Waterloo?*

Please see the Council's response to question 1.1 in [LBL01](#). This lists the places in the Plan and Policies Map where the London Plan Opportunity Areas are set out and addressed. For clarity at the beginning of the Plan, the homes and jobs targets for each Opportunity Area could also be added to the third bullet point of paragraph 1.20 and in the monitoring framework in Annex 8 of the Plan.

- (iii) *Should the Plan provide a clear articulation of its relationship with the Central Activities Zone, including its relationship within the Central Services Area?*

The Central Activities Zone (CAZ) is referenced in paragraph 1.20, fourth and ninth bullet points; and in paragraph 1.27, fifth bullet point. However, it is not referenced in paragraph 3.9, so this could be amended. A reference could also be added to Strategic Objective 2.

The Council agrees that there are insufficient references to the Central Services Area and proposes to add these to paragraphs 1.20, 1.27 and 3.9. In addition, the Council proposes to add the requirement to maintain industrial floor-space capacity to support the Central Services Area into Strategic Objective 2.

- (iv) Are the vision and objectives sufficiently comprehensive to set a sound framework for the Plan, or are there significant gaps or flaws?*

In the view of the Council, the vision and objectives are sufficiently comprehensive to set a sound framework for the Plan. However, as stated in the response to (iii) above, the Council accepts the need to add to Strategic Objective 2 to include appropriate reference to the CAZ and associated Central Services Area.

2.2 Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA)

- (i) Is the Plan supported by the SA and HRA?*

Yes. Sustainability Appraisal ([PD03](#), PD03a – PD03k, [PD04](#)) has been applied throughout the preparation of the Plan. Further information about the process is provided in section 2 and appendix 1 of [LBL01](#).

The Plan is also supported by the HRA screening assessment ([PD05](#) and [PD05a](#)), which did not identify any likely significant adverse effects on European Sites, or on the integrity of the four sites within 15km of Lambeth borough.

- (ii) What evidence is there that the SA has influenced the Plan and undertaken a full assessment of realistic alternatives? If there were no realistic alternatives to the strategy as set out in the existing adopted Plan, what is the evidence to support this?*

The realistic alternatives to the strategy set out in the existing adopted Plan were initially identified, consulted on and appraised in October 2017. These alternatives fell under the following ten broad headings: housing growth and infrastructure, affordable housing, housing for older people, self-build housing, business and jobs, town centres, hotels, waste, air quality and transport. Please see pages 14-35 of [PD03b](#) for an overview of the alternatives and the appraisal results under these ten headings; and appendix 1 (pages 36 to 192) of [PD03b](#) for the full appraisal analysis. Further policy approaches were identified following consideration of the response to Regulation 18 consultation and evolution of the London Plan. These are considered by the SA in paragraphs 5B.9 to 5B.11 of [PD03](#), which was published for consultation at Regulation 19 alongside the proposed submission version Plan.

The SA therefore undertook a full assessment of realistic alternatives for the partial review of the Lambeth Local Plan, and this was made available for consultation alongside Regulation 18 public consultation on issues for the partial review in October 2017, and again in its updated form during Regulation 19 pre-submission publication. The relationship between this exercise and the sustainability appraisal of reasonable alternatives for the spatial strategy in

previous versions of the Plan, and in the Mayor's London Plan, is explained in section 2 and appendix 1 of [LBL01](#).

The evidence that the SA has influenced the Plan can be seen in the recommendations made by the SA and the record of how these were addressed as the Plan evolved. A total of 98 recommendations were made on the SA of the Draft Revised Lambeth Local Plan October 2018. [PD03a](#) Table 2 sets these out, together with the policy response to each recommendation. A further fourteen recommendations were made on the proposed submission version Plan, all of which were addressed. Table 1 of [PD03a](#) sets these out.

(iii) Do any adverse effects identified in the SA require significant mitigation, and how does the Plan address these issues?

The likely significant effects of the Plan are assessed in section 5 of the SA (see [PD03](#), pages 30 to 260). They are summarised in Table 26 on page 276 of [PD03](#). The overall sustainability effects of the Plan, and the approach to mitigation, are discussed at paragraphs 6.19 to 6.25 on pages 274-5 of [PD03](#).

In summary, the SA identified no significant adverse effects of the Plan. It did identify one uncertain/potentially adverse effect on SA objective 3, with regards to creating an environment that is accessible and fully inclusive for all people. The uncertainty exists until such time as projects to improve the accessibility of the environment are delivered (e.g. step-free access at stations, implementation of the Health Route Network). Until then, negative effects will continue to be experienced by some groups (people with disabilities, parents and carers of young children, older people). However, there is a positive policy framework within the Plan (and the London Plan) to achieve improvements for accessible and inclusive environments in Lambeth, for example in policies T1, T4 and Q1. The existence of these policies mitigates the possible adverse effect and the SA therefore concluded this would be temporary (see page 87 of [PD03](#)).

Aside from this, the SA did not identify any other adverse effects. This can be explained in part by the number of recommendations arising from the SA during the plan preparation process, and the positive way in which they were addressed (as explained under (ii) above). SA recommendations were made on all versions of the draft plan during its preparation and these identified areas for policy improvement to either increase positive effects or mitigate potential adverse effects. The SA therefore directly influenced the Plan to minimise and mitigate adverse effects.

2.3 Delivering the vision and objectives

- (i) *Are the strategic overarching ambitions set out in policy D1 (delivering the vision and objectives) and the principles set out in policy D2 (Presumption in favour of sustainable development) justified, realistic and consistent with national policy?*

In the view of the Council, the strategic overarching ambitions set out in policy D1 are justified, realistic and consistent with national policy. The Council believes that the Local Plan must be implemented within the context of wider partnership working and other complementary initiatives, because the planning system is only one of the mechanisms necessary to bring forward sustainable growth and opportunity in the borough. The policy therefore sets the scene for the Council's approach to implementation of the Local Plan, and its expectation of partners. It also makes reference to key over-arching principles such as sustainable development; optimisation of previously developed land and vacant buildings, including historic buildings; and the promotion and maintenance of mixed, balanced and diverse communities within neighbourhoods. These are principles are enshrined within national policy and the London Plan.

Policy D2 parts (b) and (c) mirror the presumption in favour of sustainable development set out in paragraph 11 of the NPPF 2019. If this is considered to be unnecessary repetition of national policy, contrary to paragraph 16(f) of the Framework, these sections of the policy could be deleted from the Plan. However, part (a) of the policy does set out the Council's aspiration to work proactively with applicants and the supporting text advocates pre-application discussion and engagement with specialist advisors and statutory partners. In the view of the Council, it is helpful for this to be retained in the Plan.

- (ii) *Are the social, physical and green infrastructure provisions sound? In particular, are there any necessary infrastructure needs that are not addressed in the Plan; can any of the constraints, e.g. highways, flood risk or sewerage, to development be classified as 'showstoppers'?*

Please see the answer to question 10.1 under Matter 10.
