

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

<p><u>SA Stage A: Setting the context and objectives, establishing the baseline and deciding on scope</u> 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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none">• English Heritage;• Environment Agency;• Lambeth Primary Care Trust;• Coal Authority;• Highways Agency;• Lambeth Council ecologist; and• Lambeth police/community safety <p>Baseline data and other relevant plans and programmes of the Scoping Report 2010 has been reviewed and updated in the preparation of this SA.</p> <p><u>Stage B: Developing and refining alternatives and assessing their effects; and</u> <u>Stage C: Preparing the Sustainability Appraisal Report</u> 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.</p> <p>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:</p> <ul style="list-style-type: none">• identification of issues within policies that were considered to be addressed in other policies; or• identification of issues that will be helpful in the preparation of the Development Management policies or relevant SPD. <p>The August 2009 SA Report was submitted with the Submission Version Core Strategy which was adopted in January 2011.</p>

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

Social	
Crime	<ul style="list-style-type: none"> ▪ From 2010 to January 2012 total number of crimes decreased by 5.2 percent to 29,903 total crimes ▪ Total Notifiable Offences (TNOs) fell for eight successive years between 2001 and 2009. Even following a small rise in 2009/10, TNOs were still more than 30% below the figure for 2000. ▪ A recent survey found that 69% of residents feel safe when outside in the area they live after dark, up from 54% in November 2009.
Health	<ul style="list-style-type: none"> ▪ Lambeth fares comparatively worse for health inequalities when compared nationally ▪ Lambeth male life expectancy is 77 years compared with England average of 78.5 years; Lambeth female life expectancy is 81 years compared with 82.5 year England average ▪ Healthy lifestyle issues still a concern (smoking, obesity, lack of physical activity, alcohol, drug misuse) ▪ About 18% of Lambeth households are estimated to be in fuel poverty
Infrastructure	<ul style="list-style-type: none"> ▪ Existing transport infrastructure is very well used and over capacity in places ▪ Number of school places currently insufficient to meet future demand ▪ Insufficient capacity in Lambeth cemeteries to deal with future demand for burials ▪ Lambeth has 270 hectares of open space which is about 10% total land area.
Equality	<ul style="list-style-type: none"> ▪ 14th most deprived borough in England ▪ very diverse constantly evolving Borough ethnically, culturally, socially and economically ▪ Lambeth has one of the highest Black African and Black Caribbean populations in London (11.5% and 9.8% of total borough population respectively) as well as sizeable Portuguese, Polish and Vietnamese communities. ▪ 55% of Lambeth residents identify themselves as Christian, 6% as Muslim and 33% say they do not have a religion
Housing	<ul style="list-style-type: none"> ▪ 73% of stock is flats ▪ Approx 67% households live in rented accommodation; 30% own their own home ▪ Urgent need for more affordable housing, especially for families ▪ 130,000 households in Lambeth
Liveability	<ul style="list-style-type: none"> ▪ Population churn is at around 22-24% for last few years; about 88% of population remains same each year ▪ Some communities feel their neighbourhoods lack stability and that not enough households stay long enough to put down roots.
Heritage	<ul style="list-style-type: none"> ▪ In 2010/11 there were 30 buildings on the Heritage at Risk register
Environmental	
Biodiversity	<ul style="list-style-type: none"> ▪ 10 priority habitats and 7 priority species in Borough ▪ 45 Sites of Importance for Nature Conservation; 96% in positive management.
Carbon emissions	<ul style="list-style-type: none"> ▪ Lambeth's total CO₂ emissions within the scope of influence of the Local Authority was 1290.4 kilotonnes CO₂ for 2009 ▪ Industry and commercial uses accounted for 39%, domestic accounted for 41% and the remaining 20% was attributed to road transport. ▪ Lambeth has achieved a 12% per capita reduction in emissions since 2005
Flood risk	<ul style="list-style-type: none"> ▪ Much of north of Borough is within floodzone 3a for 1 in 100 year flooding from Thames ▪ Some flood risk around River Wandle
Water	<ul style="list-style-type: none"> ▪ Average household water consumption in 2010/11 was 166.5 litres per person per day
Waste	<ul style="list-style-type: none"> ▪ Total amount of waste arising in Lambeth has continued to decrease periodically ▪ Household waste recycled has increased from 10% in 2001/02 to almost 28% 2010/11 ▪ Current shortfall of 197,417 tonnes per annum between capacity of existing waste sites in Lambeth and London Plan apportionment to 2031
Air	<ul style="list-style-type: none"> ▪ Whole Borough in Area Quality management Area ▪ Borough continues to suffer from high levels of fine particles (PM10) and Nitrogen Dioxide
Economic	
Economy	<ul style="list-style-type: none"> ▪ Around 10,000 business in Lambeth of which 75% have fewer than 5 employees ▪ Over 99% of businesses in Borough are small and medium enterprises ▪ Relatively high levels of unemployment – October 2012 it was 5.6% of the population (a11830 residents) and was 1.4 percentage points higher than London average of 4.2% ▪ Unemployment rate for ethnic minorities was 17% based on Annual Population Survey results for 2009/10. This was 10.5 percentage points higher than the unemployment rate for white residents (6.5%) and higher than the BME unemployment rate across London (13.6%). However, Lambeth's ethnic minority employment (61%) is higher than the London average (58.1%).
Regeneration	<ul style="list-style-type: none"> ▪ A number of regeneration projects current in Borough including Lower Marsh Regeneration Project; Shell Centre site Masterplan Streatham and West Norwood High Streets; Vauxhall Nine Elms / Battersea Opportunity Area; Waterloo Opportunity Area; and Future Lambeth projects: Brixton, Clapham, Kennington, Norwood, Streatham.

5 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

Characteristics	Key sustainability issues
<p>Housing</p> <ul style="list-style-type: none"> • Access to good housing. • Affordable housing. • Sustainable housing. • Housing mix and types. 	<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>Employment and Economy</p> <ul style="list-style-type: none"> • Increasing jobs, particularly local jobs for local people. • Addressing high rates of child poverty. • Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups. • Tackling barriers to employment. <ul style="list-style-type: none"> ▪ London’s role in the UK economy. ▪ New business development. ▪ Business retention. ▪ Inward investment. ▪ Targeting key economic sectors. ▪ School placements 	<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>Environment and Climate Change</p> <ul style="list-style-type: none"> ▪ Reducing CO2 emissions. ▪ Climate change adaptation, including flood risk management ▪ Efficient use and management of resources. ▪ Efficient use and management of water: addressing increasing demand. ▪ Efficient use and management of energy. ▪ Efficient management of waste: increasing recycling rates and self sufficiency in waste disposal. ▪ Pressure on biodiversity and open spaces. 	<p>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>Transport</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"> ▪ Good local access to services and facilities. ▪ Tackling congestion. ▪ Increase public transport accessibility, cycling and walking. 	<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>Equalities and Accessibility</p> <ul style="list-style-type: none"> ▪ Mixed communities. ▪ Cohesive communities. ▪ Safe communities. ▪ Accessible communities. ▪ Meeting the needs of diverse communities. ▪ Addressing social inequities. ▪ Tackling crime. ▪ Tackling terrorism. ▪ Addressing fear of crime. 	<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>Health and Well Being</p> <ul style="list-style-type: none"> ▪ Improving air quality (and meeting EU targets). ▪ Addressing health inequalities and the health needs of Lambeth's existing and new residents. ▪ Develop healthy communities and help improve and protect the health and well being of residents.' 	<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>Town centres and Regeneration Viable, safe and well managed town centres:</p> <ul style="list-style-type: none"> ▪ Brixton ▪ Streatham ▪ Clapham ▪ Stockwell ▪ West Norwood / Tulse Hill <p>Regeneration of Vauxhall and Waterloo Opportunity Areas.</p>	<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>Open Space and Recreation</p> <ul style="list-style-type: none"> ▪ Better use of open space ▪ Biodiversity 	<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>The Built Environment</p> <ul style="list-style-type: none"> ▪ Location of tall buildings 	<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"> ▪ Built heritage 	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>Infrastructure</p> <ul style="list-style-type: none"> ▪ Infrastructure provision, including healthcare services and facilities; and schools 	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

	SA Objective	SEA Topic Requirement
1	Crime and safety. Ensuring safe communities with reduced crime and disorder.	Population
2	Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Population, Human Health
3	Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	Population, Human Health
4	Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	Population, Human Health, Material Assets
5	Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Population, Human Health
6	Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Population, Human Health, Material Assets
7	Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.	Population, Human Health, Material Assets, Landscape, Cultural Heritage
8	Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets.'	Landscape, Cultural Heritage (including architectural and archaeological heritage)
9	Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	Population
10	Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.	Biodiversity, Flora, Fauna, Landscape, Soil, Water
11	Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	Climatic Factors, Materials Assets
12	Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	Water, Climatic Factors
13	Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	Population, Material Assets
14	Air quality. To improve air quality.	Air
15	Education and skills. To maximise the education and skills levels of the population.	Population, Material Assets, Human Health
16	Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	Population, Material Assets
17	Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in	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.

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Table 6: Summary of SA findings

Score	Timescale	Probability	Permanent or temporary	Indicators to monitor significant and uncertain effects
1. Ensuring safe communities with reduced crime and disorder				
++	Medium term	Likely	Permanent	<ul style="list-style-type: none"> ▪ Percentage of proposals directly incorporating 'Secured by Design', 'Designing Out Crime' and 'Safer Places' principles or receiving Secure by Design accreditation ▪ Recorded crimes per 1,000 households ▪ Resident surveys on perception of crime and level of safety in town centres ▪ Resident surveys on perception of crime and level of safety in public open spaces.
2. Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health				
++	Medium to long term	Likely	Permanent	<ul style="list-style-type: none"> ▪ 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
3. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities				
++/?	Public realm improvements – medium term Large scale transport improvements – long term	Likely Funding for public transport capacity improvements uncertain at this stage	Permanent	<ul style="list-style-type: none"> ▪ Index of Multiple Deprivation ▪ Average distance of households and bus stations to health/medical centres ▪ Proximity of new housing developments to services, facilities and employment ▪ Improvement in access to open space deficiency statistics ▪ Number of private vehicles owned by residents in the Borough ▪ Gross additional wheelchair accessible homes
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands				
++/?	Medium to long term	Likely although some infrastructure (school, healthcare, transport) is uncertain at this time	Permanent with temporary effects until such infrastructure is delivered. Also temporary	<ul style="list-style-type: none"> ▪ Annual update of Infrastructure Programmes Schedule

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			construction effects	
5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion				
+/?	Infrastructure to support growth – long term; otherwise short - medium term	Transport is uncertain, otherwise achievement is likely	Permanent	<ul style="list-style-type: none"> ▪ Annual update of infrastructure programmes schedule.
6. Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity				
++/?	Mid- Long term	Likely although delivery of housing in current economic climate / recent trends is uncertain in the short-term	Permanent Temporary construction effects	<ul style="list-style-type: none"> ▪ Number of new dwellings permitted ▪ Number of new dwellings completed each year ▪ Number of new affordable dwellings built each year
7. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place				
++/?	Mid–Long term	Likely	Permanent	<ul style="list-style-type: none"> ▪ Diversity of resident ethnicity ▪ Resident surveys on satisfaction parks and open spaces ▪ Resident surveys on perception of crime and level of safety in public ▪ Level of population churn ▪ Annual update of Infrastructure Schedule
8. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets				
++/?	Historic and open spaces environments – short term and continuing; redevelopment / public realm medium to long-term as developments complete	Likely	Permanent	<ul style="list-style-type: none"> ▪ 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
9. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport				
++/?	Walking and cycling short – long term; major	Likely but funding for major transport infrastructure currently	Permanent Temporary effects associated with	<ul style="list-style-type: none"> ▪ Mode of travel, particularly commute to and from work ▪ Number of people who work locally ▪ Annual update of Infrastructure Schedule

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	transport infrastructure long-term	uncertain	construction	
10. To conserve and enhance biodiversity and to bring nature closer to people				
++	Short-term and enhancements short-medium term	Likely	Permanent; and temporary construction effects	<ul style="list-style-type: none"> ▪ Percentage of development planning approvals that have incorporated new open space ▪ Percentage of population located in an open space deficiency area.
11. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.				
+/?	Long term	Dependent on delivery of transport infrastructure, district heating networks and viability of sustainability measures in built environment	Temporary construction effects; otherwise permanent	<ul style="list-style-type: none"> ▪ Number of buildings built to Code for Sustainable Homes Level 4 and BREEAM excellent ▪ Number of district heating networks in the Borough and dwellings / premises linked to them.
12. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk				
+/?	Medium to long-term	Likely although dependent on viability in implementing water efficiency measures; reducing flood risk is uncertain	Permanent	<ul style="list-style-type: none"> ▪ Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems
13. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates				
+/?	Long-term in terms of funding and identifying and occupying new sites; short – medium term with regards to bring vacant buildings back in use	Uncertainty on funding for 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"> ▪ Annual update of Infrastructure Schedule
14. To improve air quality				
+/?	Localised efforts to improve air quality	Likely – localised improvements	Permanent with ongoing	<ul style="list-style-type: none"> ▪ Percentage of residents with health problems related to air pollution/quality ▪ Improvement of air quality at the monitoring stations around the Borough

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	– medium term Transport infrastructure delivery and gyratory remodelling – long term	Uncertainty on delivery of new transport infrastructure and improved air quality given previous efforts	management; and temporary with regards to construction effects	<ul style="list-style-type: none"> ▪ Annual update of Infrastructure Schedule
15. To maximise the education and skills levels of the population				
+/?	Existing schools and community services safeguarded. Short-medium term for up skilling and apprenticeships; Long term for new schools	Likely	Permanent	<ul style="list-style-type: none"> ▪ Annual update of Infrastructure Schedule ▪ Number of additional school places provided ▪ Percentage reduction of young people not in education, employment or training
16 & 18. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses; AND Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.				
++/?	Short-term (construction) and long-term as developments occupied	Likely although may be slower to eventuate due to economic recession	Permanent	<ul style="list-style-type: none"> ▪ Unemployment rates ▪ Number of businesses registered in the Borough ▪ Number of vacant premises in town centres ▪ Annual update of infrastructure schedule
17. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in landuse through reuse of previously developed land and existing buildings.				
++	Short term and ongoing	Likely	Permanent	<ul style="list-style-type: none"> ▪ Number of existing vacant or dilapidated / derelict buildings brought back into use ▪ Number of regeneration projects completed in deprived areas.