

Lambeth Local Plan Review

Sustainability Appraisal

Draft Revised Lambeth
Local Plan October 2018

October 2018

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December 2008

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NON-TECHNICAL SUMMARY
Sustainability Appraisal
Draft Revised Lambeth Local Plan October 2018

October 2018



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1. Introduction

1.1 This Non-Technical Summary summarises the findings of the Sustainability Appraisal (SA) of the Draft Revised Lambeth Local Plan October 2018 (DRLLP). An SA promotes sustainable development through the integration of social, environmental and economic considerations into the preparation of new planning documents. It is required by Section 39 of the Planning and Compulsory Purchase Act 2004.

1.2 The Non-Technical Summary is part of the Sustainability Report for the DRLLP. The SA report has been produced alongside the DRLLP to provide guidance on its development. This report presents the key findings to date of the Sustainability Appraisal on the DRLLP and provides background and relevant additional information.

2 The Draft Revised Lambeth Local Plan October 2018

2.1 Lambeth Council is currently reviewing parts of its Local Plan 2015. The existing Local Plan, adopted in 2015, contains a strong vision for the development of the borough to improve opportunities for local people. It sets the planning policies for the borough and much of it is still up-to-date and effective. However, changes to national planning law and policy, a full review of the London Plan and changes in Lambeth mean parts of the Local Plan need to be reviewed.

2.2 The DRLLP 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 2035. It is based on the social, economic and environmental objectives and priorities of the Lambeth Borough Plan 2016-2021, together with other relevant plans, programmes and strategies all of which have implications for the development and land use within the borough.

2.3 The borough-wide planning policies are organised by topic: housing, economic development and town centres, social infrastructure, environment, transport and quality of the built environment. Some aspects of policy in these chapters have changed quite fundamentally but in many cases the changes arise from more superficial updating or cross-referencing to the emerging new London Plan. Some of the most significant areas of policy change include:

- Inclusion of the emerging new London Plan borough-level housing target of 1,589 net additional dwellings per annum in Lambeth, with policies to support delivery of this target, including on smaller sites
- Cross-reference to the new London Plan threshold approach to affordable housing, whereby major development proposals that meet London Plan set thresholds for affordable housing and other Local Plan policy requirements can follow a 'Fast Track Approach' without viability testing at planning application stage
- A new policy specifically relating to estate regeneration schemes
- Stronger protection for existing office floorspace and clear support for new floorspace to support economic growth in the borough
- A new policy requiring major office schemes in the north and centre of the borough (including in the proposed new Brixton Creative Enterprise Zone) to provide affordable workspace for smaller creative and digital enterprises
- Reworked transport policies to support delivery of the emerging Lambeth Transport Strategy, including Healthy Streets and a significant modal shift to walking and cycling

- A commitment to apply the emerging new London Plan policy on air quality to development proposals in Lambeth, also supported by a stronger emphasis on urban greening.

3 The Sustainability Appraisal

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

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

Equality Impact Assessment

3.3 It is 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 sustainability objectives. This helps to explore the impact of the proposed policy on different equalities groups, (ie. ethnicity, gender, gender re-assignment, disability, age, sexual orientation, religion or belief, socio-economic factors, marriage and civil partnership, pregnancy and maternity, language, health). For example, whilst SA objective 5 specifically addresses issues of equality and diversity, other objectives also tease out equality impacts via appropriate sub-questions.

Health and Well-being Impact

3.4 As with the EqIA, the Health and Well-being Impact Assessment is integrated into the SA; an approach previously adopted in the SA on the Lambeth Local Plan 2015, which was discussed and agreed with NHS Lambeth. In addition, the Lambeth public health team have had a role in the preparation of the SA by providing current health statistics for the borough and up-to-date guidance and documents on public health. The public health team were also given an opportunity to comment during the preparation of the DRLLP and advised about evidence for aspects of policy development. The Lambeth Clinical Commissioning Group (CCG) have been engaged in preparation of the Infrastructure Delivery Plan for the Local Plan review.

Table 1: SA process thus far

Date	Actions
SA Stage A: Setting the context and objectives, establishing the baseline and deciding on scope	
March 2016	The draft Scoping Report was made available for comment to the three statutory bodies Natural England, Environment Agency and Historic England over a five-week period from mid-March 2016. The draft Scoping Report 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 (objectives to be used to appraise the DRLLP). Consultation responses were received from all three statutory bodies and their comments incorporated where appropriate.
Stage B: Developing and refining alternatives and assessing their effects; and Stage C: Preparing the Sustainability Appraisal Report	
October 2017	In October 2017 an initial sustainability appraisal was prepared for the Lambeth Local Plan Review Issues and Reasonable Alternatives. The SA assessed each reasonable alternative identified for the local plan issues against the sustainability objectives established through the preparation of the Scoping Report. Consultation was undertaken from October to December 2017 and thirteen representations were received on the SA Issues and Reasonable Alternatives, of which six made comments on the SA.
October 2018	This SA Report predicts and evaluates the significant effects of the Draft Revised Lambeth Local Plan October 2018. Where appropriate, recommendations have been made to reduce adverse effects and maximise beneficial effects.
Stage D: Consulting on the Draft Revised Lambeth Local Plan October 2018 and SA Report	
October – December 2018	The SA Report September 2018 along with the Draft Revised Lambeth Local Plan October 2018 will both be available for public consultation for 8 weeks. The feedback received from this consultation will be considered for the Revised Lambeth Local Plan Proposed Submission Version.
Stage E: Monitoring the significant effects of implementing the Local Plan	
October 2018	The Sustainability Appraisal on the Draft Revised Lambeth Local Plan October 2018 makes recommendations for how significant and uncertain effects of the Draft Revised Lambeth Local Plan should be monitored.

4 Current environmental, social and economic conditions in 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 the 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 diverse 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, currently providing a total area of 48 hectares over 28 KIBAs in the borough. (The DRLLP proposes changes to KIBAs which if approved will result in a total area of 43 hectares over 29 KIBAs.)

- 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 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 100 people living in each hectare, more than twice the London population density. Nearly a third of a million people live in Lambeth – at least 318,000. It has a complex social and ethnic mix, with large African and Portuguese populations, and is an important focus for the UK black Caribbean population. The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. Lambeth is the 8th most deprived borough in London and 22nd most deprived in England. This is an improved relative position since 2010 when Lambeth was ranked as the 14th most deprived authority in England. The most deprived places in the borough are mostly in Brixton and Stockwell, with some in Knight's Hill.
- 4.5 Lambeth is an important part of the London economy, particularly in providing homes for young, skilled workers. There are 140,500 people employed in Lambeth, with a significant concentration of jobs in the north of the borough. The borough has relatively few jobs: the biggest sectors for employment within Lambeth are human health and social work and administrative and support services. Residents are more likely to be in employment than the London average. Whilst unemployment in 2014 was the lowest in ten years, there was an increase from 6% to 7% in 2015, which is still amongst the lowest in the last decade. However, this masks sharp disparities across the borough. Overall, employment rates are significantly higher for white Lambeth residents than for those from Black and Minority Ethnic (BME) backgrounds. 85% of white working age residents were in employment compared to 66% of BME working age residents. Lambeth's population is highly skilled, but those who are not risk missing out on the opportunities created by growth.
- 4.6 Lambeth has a relatively young age profile. Although it is a largely residential borough, it is a destination for young working age people, rather than families. The male and female populations have different age profiles. The young working age population is roughly even between males and females. For all ages over 50, there are slightly more females than males. This reflects national trends.
- 4.7 If trends continue, Lambeth's population is projected to grow by just over 1% per year for the next five years, and just under 1% for the five years after that. The borough will continue to have a majority of young working age people (20-44). Although the UK population's older population is projected to increase, this will affect Lambeth less than places which are destinations for older people. Lambeth's population aged 60+ is projected to grow by a quarter in the next 10 years, compared to a 10% growth across the whole population. There are substantial differences between ethnic groups. For example, the black Caribbean 60+ population is projected to grow by almost 40%. Similarly, the older black African population, which is currently small, is projected to nearly double. The older white population, which is larger, is projected to grow by about 12%.
- 4.8 Although Lambeth is a largely residential borough with many long term residents, the proportion of people moving in and out of the borough is high, similar to many places in inner London. Approximately 12% of the population leave each year and are

replaced by around 12% new arrivals. In other words, around 88% of the population each year remains the same.

- 4.9 There are around 136,000 households in Lambeth. Family households – couples with or without children – make up 29% of Lambeth’s households. Lone parents make up 15% of households. Single person households make up 34% and others, such as working age house-sharers, account for 21% of households (SOB 2016). If current trends continue, the number of households will rise by 30,000 between 2011 and 2031. Around 65% of households live in rented accommodation, and a third own their own home. Just under one in five households rent from the council, and around 16% rent from other social landlords. Just under one in three households are privately rented. In recent years, there has been a noticeable increase in concern about lack of affordable housing. Over 70% of households in Lambeth live in flats, either purpose built or converted houses. Just over 10% of households live in detached or semi-detached houses (SOB 2016).
- 4.10 Around 40% of Lambeth’s population is white with a UK background. White people make up 59% of the population. Around 40% of Lambeth residents are White British or Irish, in line with inner London (43%). 15% of the population are from other White backgrounds – around 47,000 people. About two thirds of these people are from Europe outside the UK & Ireland, 8% are from central and south America, 4% from North America and the Caribbean, and 8% from Australasia.
- 4.11 Black people make up a quarter of the population (25%). Lambeth’s largest non-white ethnic group is black African (11.5%), followed by black Caribbean (9.8%). Lambeth has the second largest proportion of black Caribbean people in London (9.5%) after Lewisham (11%). Lambeth has a small Asian population compared to many places in London. Only 7.8% of Lambeth residents are from Asian backgrounds (including Chinese), much less than the inner London average (14.5%). Around 150 different languages are spoken in families in the borough. Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages.
- 4.12 Estimates suggest that Lambeth has one of the largest Lesbian Gay Bisexual and Transgender (LGBT) populations in London.
- 4.13 Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents with a religion.
- 4.14 About 37,000 people in Lambeth have their day-to-day activities limited by a long term illness or disability. About 60% of people with a limiting health condition are aged over 50.
- 4.15 There are an estimated 49,000 people in poverty in Lambeth before housing costs, and 87,000 people in poverty after housing costs. A third of working age people and a quarter of people of retirement age in Lambeth are living in poverty. However, Lambeth is not one of London’s most impoverished boroughs.
- 4.16 Public transport provision in the Borough is generally good for non-disabled people but less good for those with disabilities or access needs. There are 14 over-ground 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.

4.17 Table 2 below lists key statistics in Lambeth for sustainability topic areas.

Table 2: Key sustainability statistics in Lambeth

Social	
Crime	<ul style="list-style-type: none"> ▪ There has been a 24% reduction in these priority crimes since 2012 ▪ Lambeth has the 6th highest crime rate in London; the 2nd highest rate for Violence with Injury, Sexual Offending and Drugs, and the third highest number of Anti-Social Behaviour (ASB) calls to Police compared to the rest of London. ▪ Hate crime is increasing; racist offences have increased by 36% and homophobic offences by 34.9% ▪ More than nine in ten residents (97%) agree that they feel safe walking in their local area during the day.
Health	<ul style="list-style-type: none"> ▪ Both male and female life expectancy is lower than national averages. ▪ Lambeth male life expectancy is 78.5 years ▪ Lambeth female life expectancy is 83 years ▪ In some of the most deprived wards in Lambeth, life expectancy is 5.6 and 3.8 lower for men and women respectively when compared with the borough's least deprived areas ▪ Over 85% of people in Lambeth say they are in good or very good health. ▪ About 6% of Lambeth residents have their day-to-day activities limited a lot by a long-term health problem or disability (18,600 people), and another 6.6% (20,000 people) are limited a little.
Infrastructure	<ul style="list-style-type: none"> ▪ Existing transport infrastructure is very well used and over capacity in places ▪ Insufficient capacity in Lambeth cemeteries to deal with future demand for burials ▪ There are over 60 parks and open spaces in Lambeth, 14 of which have been awarded the Green Flag award
Equality	<ul style="list-style-type: none"> ▪ About 37,000 people in Lambeth say their day-to-day activities are limited by a long term illness or disability, about 17,000 limited a lot, and 20,000 limited a little. ▪ Black people make up around a third of the population (30.4%). Lambeth's largest non-white ethnic group is black African (11.5%), followed by black Caribbean (8.8%). ▪ Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages ▪ Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents by religion, which have differing ethnic profiles. ▪ None of Lambeth's twenty-one wards is in the 10% poorest in London and Clapham Common ward is in the 10% most affluent. ▪ Measuring poverty as having a household income below 60% of the median income, there are an estimated 49,000 people in poverty in Lambeth before housing costs, and 87,000 people in poverty after housing costs. ▪ IMD 2015 places Lambeth as the 8th most deprived borough in London and 22nd most deprived in England.
Housing	<ul style="list-style-type: none"> ▪ 73% of stock is flats – typical of inner London ▪ Around 67 per cent of households live in rented accommodation (both social and private rented) and 32.5 per cent own their own home, similar to other inner London boroughs. ▪ Seventeen per cent of households rented from the council in 2016, down from 29 per cent in 2001. The proportion of private renters increased from 18 per cent to 33 per cent during this period ▪ 136,000 households in Lambeth
Liveability	<ul style="list-style-type: none"> ▪ Population churn is at around 22-24% for last few years; about 80% of population remains same each year ▪ In 2016 nine in ten (94%) residents see their local area as a place where people from different backgrounds get along well together, up from 87% in 2015.
Heritage	<ul style="list-style-type: none"> ▪ 62 Conservation Areas covering approximately 30 per cent of the borough including circa 2,500 listed buildings
Environmental	
Biodiversity	<ul style="list-style-type: none"> ▪ 10 priority habitats and 7 priority species in Borough ▪ 48 Sites of Importance for Nature Conservation
Carbon emissions	<ul style="list-style-type: none"> ▪ Total energy consumption in Lambeth equates to 3.2 per cent of the total energy consumption in London and Lambeth ranks 14th out of the 33 London boroughs and has been falling steadily over ten years. ▪ In 2015, Lambeth had lower levels of carbon dioxide emissions at 3.2 tonnes per capita

	than London as a whole (3.8 tonnes) and England (5.6 tonnes) and the carbon dioxide emissions continue to fall
Flood risk	<ul style="list-style-type: none"> ▪ Much of north of Borough is within flood zone 3a for 1 in 100 year flooding from Thames ▪ Some flood risk around River Wandle
Water	<ul style="list-style-type: none"> ▪ Average household water consumption is about 166.5 litres per person per day
Waste	<ul style="list-style-type: none"> ▪ Lambeth produces around 121,000 tonnes of local authority collected waste a year and around 100,000 tonnes of business waste. ▪ The majority of Lambeth's waste is exported to facilities within London in the first instance
Air	<ul style="list-style-type: none"> ▪ Whole Borough in Area Quality Management Area ▪ There are five air quality focus areas in the borough ▪ The three major sources of emissions in the borough are from residential and commercial premises (mainly gas boilers) and construction sites (dust and machinery emissions) – with emissions from construction activities noted to be increasing
Economic	
Economy	<ul style="list-style-type: none"> ▪ There are 140,500 people employed in Lambeth, with a significant concentration of jobs in the north of the borough. Employment has grown more slowly in Lambeth than the London average since 2002, while the borough also has a relatively small business base. ▪ The two biggest sectors in for employment within Lambeth are human health and social work and administrative and support services. ▪ Whilst unemployment in 2014 was the lowest in ten years, there was an increase from 6% to 7% in 2015, which is still amongst the lowest in the last decade. ▪ In the year to June 2015, 85% of white working age residents were in employment compared to 66% of BME working age residents. ▪ Lambeth has the highest rate of long-term JSA claimants in London, the second highest level of JSA claimants aged 50 and over, and young people in Lambeth are more likely to claim JSA than the London average. ▪ The business base in Lambeth is comparatively small but the number of new businesses being created in the borough has increased significantly, with 1,445 small business enterprises in the borough. ▪ Following the national trend, self-employment and part-time working have both increased in Lambeth and 35,000 Lambeth residents are estimated to be self-employed
Regeneration	<ul style="list-style-type: none"> ▪ A number of regeneration projects current in Borough including Brixton, Waterloo opportunity area, Vauxhall, Oval and Kennington Development Area, Clapham and Streatham, West Norwood and Tulse Hill town centres. ▪ Estate regeneration projects include Central Hill, Cressingham Gardens, Fenwick Estate, Knight's Walk, Loughborough Junction, Myatts Field North, South Lambeth Estate and Westbury.

5 What would happen without the Draft Revised Lambeth Local Plan

- 5.1 The SA is required to look at what the effect on the current conditions would be if there was no DRLLP. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, then it is essential to have an up-to-date Local Plan. If there was no Revised Local Plan there would be a risk that policies within the existing adopted Local Plan would be considered 'out-of-date' under the National Planning Policy Framework (NPPF), certainly by 2020. In this situation decisions would be made following national and regional policies, which may not always be appropriate for the local context of Lambeth.
- 5.2 For example, as long as development proposals meet the NPPF definition of sustainable development, applications must be approved. This may result in more student housing than desired for the borough for example, or loss of employment generating land or lower than desired standards of sustainability of the built form/public realm.
- 5.3 Another issue is that there is an increasing demand for housing and especially genuinely affordable and sustainable housing within the borough. Absence of a Revised Local Plan would not be likely to provide the amount of affordable housing needed in the right locations in the borough. There are a high proportion of apartments within Lambeth. Different types and sizes of housing are needed and this

may not be achieved as effectively without an up-to-date Revised Local Plan.

- 5.4 In general, development agreed without an up-to-date Revised Local Plan may not fit local needs. For example, the right development may not happen in our town centres (for example too many food and drink uses or betting shops) and the right services and facilities might not be developed for the expected growth in population.

6 Key sustainability issues

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

Table 3: Summary of key sustainability issues in Lambeth

Lambeth key issue	London key issue ¹	Notes – KEY ISSUE SUMMARY
Increase the overall supply and mix of housing , including affordable housing. Capacity for conversions.	Lack of affordable housing; Under-supply of homes which meet the needs of Londoners (size, type, tenure); High level of approvals, low level of completions; Increasing costs of housing relative to wages; Homelessness; Implications from major Government reforms to housing legislation and policy	Access to good housing; Affordable housing; Sustainable housing; Housing mix, types, tenures.
Conserve, protect and enhance heritage assets , their settings and the wider historic environment as part of reinforcing local distinctiveness and place-making	Heritage assets at risk from neglect, decay, inappropriate development and air pollution; Views and vistas to heritage assets are at risk from increased development pressures; Potential harm to the significance of heritage assets and wider historic environment through inappropriate development.	Built heritage; Views and vistas.
Provide the essential infrastructure to support population growth.	Significant increase in the population; Young profile; Ageing and more diverse population; Uncertainty of the composition of the population, including migration patterns; Insufficient secondary school places to meet growing needs; Increased pressure on London's infrastructure as a result of growth and increased economic activity; Lack of high speed and efficient connectivity (digital) across all parts of London; Need to improve sewer and wastewater infrastructure capacity	Infrastructure provision, including healthcare services and facilities; digital connectivity and schools.
Develop mixed, cohesive, safe communities accessible to all.	Increasing aging and diverse population; Persistent causes of Multiple Deprivation High levels of poverty in some parts of London, with rates of child poverty continuing to exceed national levels; Discrimination; Isolation; Population churn and impact on community cohesion; Gentrification; Increased threat of major incidents and unplanned events; Perceptions of lack of safety; Fear of crime creating barrier to activities leading to increased social isolation; Vulnerability of different groups of people at greater risk of crime; More vibrant night-time economy leading to increased risk	Mixed communities; Cohesive communities; Safe communities; Accessible communities; Meeting the needs of diverse communities; Addressing social inequities; Tackling crime; Tackling

¹ Taken from IIA of London Plan (Nov 2017)

Lambeth key issue	London key issue ¹	Notes – KEY ISSUE SUMMARY
	of crime	terrorism; Addressing fear of crime.
<p>Provide good access to local services and community facilities within neighbourhoods.</p> <p>Increase public transport accessibility and promote walking and cycling.</p>	<p>Poor orbital connectivity by all modes of public transport in outer London; Poor connectivity across the River Thames in east London; Reduced transport connectivity across London as a result of congestion and overcrowding on services and roads; Reduced connectivity across London by walking as a result of congestion and overcrowding on pavements and footpaths; Increasing airport capacity will impact on the spatial and economic fabric of the city; Barriers to using public transport; Poor design of the built environment; Loss of pubs, cinemas, creative workspace, live music and other cultural facilities and risk of harm to heritage assets; Inequality in access to cultural venues</p>	<p>Good local access to services and facilities; Tackling congestion; Increase public transport use, accessibility and provision, cycling and walking.</p>
<p>Increase the number and variety of jobs in the local economy, including local jobs for local people.</p>	<p>Disparities between rates of employment among London's residents; Disparity between wages and cost of living; Lack of diversity in jobs provided; Growth of low paid employment and zero hours contracts; Lack of support for transition from education to work, especially for young women; Large variations in educational performance across London</p>	<p>Increasing jobs, particularly local jobs for local people; Addressing high rates of child poverty; Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups; Tackling barriers to employment; London's role in the UK economy.</p>
<p>Support the growth of key economic sectors through new business development, business retention and inward investment.</p>	<p>Changing global economy; London's Productivity; Potential loss of agglomeration benefits; Increased pressure on London's infrastructure as a result of growth and increased economic activity; Risk that infrastructure could constrain economic growth; Lack of high speed and efficient connectivity (digital) across all parts of London; Loss of employment land as a result of increased pressure for housing; Insufficient amount of floorspace available to meet identified needs; Affordability of business space, particularly for small and medium sized enterprises and start-ups</p>	<p>New business development; Business retention; Inward investment; Digital connectivity Targeting key economic sectors.</p>
<p>Create viable, safe and well managed town centres:</p> <ul style="list-style-type: none"> ▪ Brixton ▪ Streatham ▪ Clapham ▪ Stockwell ▪ West Norwood / Tulse Hill <p>Support the regeneration of</p>	<p>Impact of mixed use development – night-time economy and residents; Impact on town centres as a result of a reduction in demand for retail floorspace; Poor quality public realm in some parts of London which can discourage active travel; Risk of poor design, harm to the distinctive character of places lack of legible neighbourhoods and sense of place</p>	<p>Viable, safe and well managed town centres.</p>

Lambeth key issue	London key issue ¹	Notes – KEY ISSUE SUMMARY
Vauxhall and Waterloo Opportunity Areas		
Support the regeneration and renewal of London Plan Opportunity Areas .	Development and Regeneration. The sustainable development and regeneration of London, including addressing areas of deprivation and generating a lasting and sustainable legacy from the Olympic Games, particularly for East London communities. The Opportunity and Intensification Areas offer significant potential for sustainable development to meet London's housing and employment needs.	Regeneration of London Plan Opportunity Areas.
Reduce carbon emissions from residents, businesses, public services and buildings. Implement measures to help Lambeth adapt to the consequences of inevitable climate change , including flood risk management	London is not currently meeting the Mayor's CO ₂ emission target; Transport will continue to contribute significantly to CO ₂ emissions; CO ₂ emissions from buildings continue to rise; London is no longer a global leader in terms of transitioning towards a low carbon economy; Increase in extreme weather events such as flood risk, drought and heat risk and associated impacts; Changing demographics such as an ageing population and more under five year olds increasing the number of potentially vulnerable people; Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect; Risk of flooding to property and people from river, surface water, tidal, sewer, ground water and reservoir; Increase in run-off and potential contamination and disruption of flows; Necessary infrastructure needs to be planned for, funded and implemented to support growth and development	Reducing CO ₂ emissions. Climate change adaptation, including flood risk management
Maximise the efficient use and management of resources , including water, energy and waste.	Inability for London to accommodate required growth within its boundaries; Unsustainable patterns of development within and across London's boundaries; Higher densities development; Competing pressures for land impacts on ability to provide social, physical and environmental infrastructure; Non-efficient use of land; Integration of land use and transport; Spatial impact and consequential development pressures resulting from decision on London's future airport capacity; Relatively high and ineffective use of fossil fuels contributing towards London's GHG emissions and air pollution; Insufficient low carbon energy supply; High number of Londoners in fuel poverty. Energy-inefficient building stock & transport; Un-utilised local energy resources; Need to manage peak electricity demand Need to reduce per capita water consumption; Need to plan for and deliver additional new water resources; Need to improve the quality of water in London's waterbodies; Need to improve the physical form of London's waterbodies; Need to improve sewer and wastewater infrastructure capacity; Increasing pressure on waste sites and infrastructure including wharves in London to meet demand; Wasteful economy increasing disposal costs and climate change impact; Low municipal waste recycling rate and inconsistent	Efficient use and management of resources; Efficient use and management of water: addressing increasing demand; Efficient use and management of energy; Efficient use and management of waste: increasing recycling rates and self-sufficiency in waste disposal; Pressure on biodiversity and open spaces.

Lambeth key issue	London key issue ¹	Notes – KEY ISSUE SUMMARY
	<p>recycling service provision falling short of stretching recycling targets; Fragmented waste governance resulting in inconsistent recycling service provision and performance across London; Likely increase in waste arisings in particularly construction materials to meet the needs of London’s growing population; Threat to London’s geodiversity as a result of increased demand for development; Modifications to the landscape and subsequently geomorphological processes; Remediation of contaminated land</p>	
Health and well-being, including air quality	<p>Increasing health inequalities across the population; Londoners are living with complex health needs for longer period; Increasing and changing pressure on the health services and service provision; Differentials in life expectancy and healthy life expectancy across London; Widening social inequalities; Low levels of physical activity and increasing obesity levels across the population; High levels of NO_x, PM₁₀ and PM_{2.5} emissions from road transport; Little to no predicted reduction in PM₁₀ and PM_{2.5} emissions from road transport between 2013 and 2030; London is not compliant with legal limit values for NO₂; Large numbers of the population are exposed to levels of NO₂ above the EU limit value; Exposure to poor air quality is unequal across London and some areas are more exposed to poor air quality than others; The health impacts of air pollution include: an increased risk of early death as well as whole-life impacts on lung function, lung health and increased susceptibility to cardiovascular diseases, respiratory cancer, stroke, asthma and COPD; Parts of the population are exposed to roadside and railway noise that exceeds the threshold; Increasing noise levels from night-time economy, freight movement and deliveries associated with mixed use development; Lack of quiet and tranquil places for relaxation and enjoyment.</p>	<p>Improving air quality (and meeting EU targets); Addressing health inequalities and the health needs of Lambeth’s existing and new residents.</p>
Biodiversity, open space and green infrastructure	<p>Loss of biodiversity and reduced ecological resilience as a result of increased pressure for development and intensification of existing development; Decrease in Areas of Deficiency in Access to Nature and increased recreational pressure on existing habitats and green spaces; Deficiencies in open spaces in some parts of the city; Impact of climate change and threat of new pests and diseases; Poor connectivity to green infrastructure for all</p>	<p>Protect and enhance existing open spaces, biodiversity and green infrastructure; Increase amount of open space and green infrastructure.</p>

7. Sustainability Appraisal Framework

7.1 The SA Framework is a way of considering the effects of the Local Plan. It is a list of social, economic and environmental objectives that the Plan is tested against. The framework used is shown in the table below, which also shows how each objective meets SEA topic requirements. The SA Framework was developed in the Scoping

Report and has since been updated in response to consultation comments received. As a result, the SA Framework presented below is slightly different to that presented in the Scoping Report.

Table 4: Revised Sustainability Objectives and SEA Topic Requirement

	SA Objective	SEA Topic Requirement
1	Crime and safety. Ensuring safe communities with reduced crime and disorder.	Population
2	Health and well-being. Promote a healthy borough, by reducing health inequalities and 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, safety and security, 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. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	Population
10	Biodiversity. To protect, enhance and promote biodiversity, and to bring nature closer to people.	Biodiversity, Flora, Fauna, Landscape, Soil, Water
11	Green infrastructure. To create, manage and enhance green infrastructure.	Biodiversity, Flora, Fauna, Landscape, Soil, Water
12	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
13	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
14	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
15	Air quality. To improve air quality.	Air
16	Education and skills. To maximise the education and skills levels of the population.	Population, Material Assets, Human Health
17	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
18	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, taking into account constraints such as contaminated land..	Material Assets, Soil
19	Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	Population, Material Assets

8 Sustainability Appraisal Findings

8.1 An appraisal has been carried out on the sustainability of the DRLLP October 2018 policies. The spatial strategy, vision and objectives are largely the same as those in the adopted Lambeth Local Plan 2015. As they were appraised then, there is no need to appraise them again. Summary results of this previous appraisal of the vision and objectives are shown below:

The vision and strategic objectives portray a sustainable approach to the Borough's future development. There is a balanced approach to social, environmental and economic issues and a real desire to tackle climate change (mitigation and adaptation), address infrastructure issues, provide local jobs and services and promote sustainable modes of travel. The vision and strategic objectives have taken on board many of the issues highlighted previously by the SA. However, there remain uncertainties about the delivery of essential infrastructure required for growth, in particular:

- *Timing: there is a danger that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front;*
- *Funding (and land required?) for some of the proposed infrastructure schemes has not been identified (e.g. some of the school place provision);*
- *The proportion of open space per resident ('green infrastructure') is likely to reduce as the population increases whilst new open space opportunities are extremely limited.*

Effects of DRLLP October 2018 policies on SA Objectives

- 8.2 First, it is important to point out that the level of growth proposed for the borough is required by the London Plan. The draft London Plan 2018, in its preparation, was itself subject to SA in 2017– this was called an Integrated Impact Assessment (IIA).
- 8.3 The effects of the DRLLP October 2018 on individual SA objectives are outlined below in Table 6. On the whole it is considered that the DRLLP October 2018 policies have been produced with sustainability actively in mind.
- 8.4 Generally, the SA found that the DRLLP policies seek to achieve significant positive social and economic effects and avoid or reduce the effect of (mitigate) significant negative effects. It found that the scale, type and level of development proposed in the DRLLP will not give rise to significant negative effects on biodiversity, landscape, historic environment and natural resources. This is because of the protective nature of policies in the DRLLP. It is recognised that there will be increases in carbon emissions and water use associated with increased population growth, but policies which have been included in the DRLLP together with draft London Plan policies seek to mitigate the effects. The SA was not able to be definite about this because of uncertainties about the effects of these mitigation policies, which are discussed further below.
- 8.5 Uncertainties on the implementation of the DRLLP were mainly about delivery of required housing, transport improvements and additional social services and facilities to support population growth, and how successful environmental policies would be.
- 8.6 Environmental issues which the SA could not be certain about were:
- whether higher environmental standards for development will be achieved (use of Passivhaus or Home Quality Mark and higher BREEAM standards);
 - achievement of target scores for the urban greening factor (and whether living roofs and walls will be included in new development);
 - how much carbon emissions will be reduced across the borough given the amount of growth proposed through the DRLLP; and
 - whether air quality will be significantly improved.

SA Recommendations

- 8.7 A total of 98 recommendations have been made in the SA with the aim of improving the impact of policies on sustainability or reducing potential for negative effects. Many involve clarifying policy intent and/or tweaking wording to improve outcomes for

sustainability objectives. There are a few recommendations that seek to ensure better safety and health outcomes for people in the borough (for example policies on estate regeneration, parking, urban design, walking, cycling and Clapham). There are recommendations that seek to include more references to air quality for a range of policies (for example policies on open space, trees, landscaping and places and neighbourhoods). Some recommendations will likely result in more positive effects for a number of different SA Objectives. For example allowing provision of new social infrastructure within walking distance (rather than just on-site as currently proposed) of the development site (policy S2) would maximise positive effects for SA objectives 3, 4, 5, and 7 as the wider community would also have access. For more equitable outcomes across all groups of people, it is recommended that leisure facilities are made available for general public use, rather than just those groups identified by the council (policy S2). This would also result in more positive effects on SA Objectives 3, 5, 7). Appendix 1 provides the full schedule of SA recommendations. The policy team will review all recommendations and provide a response to each in preparing the proposed submission version of the revised Lambeth Local Plan.

- 8.8 The Sustainability Appraisal has scored the sustainability effects of the DRLLP using the symbols shown in Table 5. Table 6 presents the likely effects of the DRLLP 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

- 8.9 Consideration of Reasonable Alternatives to policy approach
Reasonable alternative (RA) approaches have been considered in the DRLLP plan-making process for the ten key issues considered in the partial review: housing growth and infrastructure; affordable housing; housing for older people; self-build housing; business and jobs; town centres; hotels; waste; air quality; and transport. These issues were explored through a series of topic papers and questions to help facilitate consultation and feedback, with links to further evidence where relevant. The topic papers identified different possible ways (reasonable alternatives) of addressing the key issues. An SA was prepared on the reasonable alternatives identified in the topic papers/online surveys (see Appendix 2). The results of the SA work on the issues and reasonable alternatives has helped inform the DRLLP.

9 Designated sites, including European Nature Conservation sites

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

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 DRLLP.

10 **Technical difficulties/data limitations**

10.1 The SA process is a useful way to identify potential issues and make suggestions to reduce possible negative impacts. It tests how policies work against 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 in town planning and sustainability issues. Consultation on the SA report will also 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 consideration.
- Difficulties have been experienced in predicting the impact of the DRLLP in the long term (for example uncertainties under the current difficult economic climate, funding gaps for some infrastructure projects and Brexit negotiations). This has made it difficult to accurately appraise the sustainability of some policies.
- Difficulties distinguishing the influence of the DRLLP from other external factors. For example whilst specific local conditions such as air quality, carbon emissions or health may be getting worse, this may be due to various factors beyond the control of the DRLLP, and the DRLLP itself may still have a positive influence in so far as planning can influence such areas.
- A further difficulty was deciding how *significant* the effects of the DRLLP are. This is particularly true for sustainability objectives such as health which are influenced by a wide range of factors.

11 **Conclusion**

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

Table 6: Summary of SA findings

Score without recommendations	Score with recommendations	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"> Infrastructure Delivery Plan updates Amount of open space lost through completed planning permissions Housing supply: number of net additional dwellings completed Tenure of new affordable housing (completions and approvals) Modal Share – walking, cycling and public transport Number of cycle parking spaces provided in completed major developments Number of disabled parking spaces per completed major development Life expectancy Deaths from heart disease less than 75 years
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"> Number of disabled parking spaces per completed major development Modal Share – walking, cycling and public transport Infrastructure Delivery Plan updates Average distance of households and bus stations to health/medical centres Proximity of new housing developments to services, facilities and employment
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands					
?	?	Medium to long term	Likely although some infrastructure (school places, healthcare, transport) is uncertain at this time	Permanent with temporary effects until such infrastructure is delivered. Also temporary construction effects	<ul style="list-style-type: none"> Infrastructure Delivery Plan updates
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"> Gross affordable housing - % of habitable rooms in major developments (completions and approvals) Tenure of new affordable housing (completions and approvals)

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					<ul style="list-style-type: none"> ▪ Net additional student bedspaces completed ▪ Number of specialist older persons housing units completed ▪ Gypsy and traveller pitches ▪ Proportion of major application approvals that make provision for Affordable Workspace (in parts of borough covered by policy ED2) ▪ Number of disabled parking spaces per completed major development ▪ Infrastructure Delivery Plan updates
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"> ▪ Housing supply: number of net additional dwellings completed ▪ Gross affordable housing - % of habitable rooms in major developments (completions and approvals) ▪ Tenure of new affordable housing (completions and approvals) ▪ Net additional student bedspaces completed ▪ Number of specialist older persons housing units completed ▪ Gypsy and traveller pitches
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"> ▪ Proportion of vacant units in Brixton and Streatham Major centres, Clapham, Vauxhall and West Norwood District centres and Lower Marsh/The Cut CAZ Frontage. ▪ Modal Share – walking, cycling and public transport ▪ Number of cycle parking spaces provided in completed major developments ▪ Number of disabled parking spaces per completed major development ▪ Amount of open space lost through completed planning permissions ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Infrastructure Delivery Plan updates ▪ 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
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"> ▪ Amount of open space lost through completed planning permissions ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Number of heritage assets on the 'at risk' register ▪ Number of conservation areas with up-to-date character appraisals ▪ Infrastructure Delivery Plan updates ▪ Number of listed buildings within the borough ▪ Number of registered parks and gardens
9. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport					
+/?	++/?	Walking and cycling short – long term; major transport	Likely but funding for some major transport	Permanent Temporary effects	<ul style="list-style-type: none"> ▪ Modal Share – walking, cycling and public transport ▪ Number of cycle parking spaces provided in completed major developments

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		infrastructure long-term	infrastructure projects currently uncertain / not secured	associated with construction	<ul style="list-style-type: none"> ▪ Number of disabled parking spaces per completed major development ▪ Infrastructure Delivery Plan updates
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"> ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Amount of open space lost through completed planning permissions ▪ Change in areas of biodiversity importance ▪ Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls) ▪ The achievement of BAP targets ▪ The change in area and condition of BAP habitats/species ▪ The change in area of Sites of Importance for Nature Conservation ▪ Percentage of borough by area located in an access to nature deficiency area
11. To create, manage and enhance green infrastructure					
+/?	++/?				<ul style="list-style-type: none"> ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Amount of open space lost through completed planning permissions ▪ Change in areas of biodiversity importance ▪ Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)
12. 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 major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Amount of open space lost through completed planning permissions ▪ Change in areas of biodiversity importance ▪ Number of major application approvals for non-residential developments achieving BREEAM Excellent ▪ Carbon dioxide emission reductions against Part L building regulation requirements in approved major developments ▪ Number of buildings built to Home Quality Mark or Passivhaus standard ▪ Number of DHNs in the borough and dwellings/premises linked to them
13. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk					
+/?	+/?	Medium to long-term	Dependent on viability in implementing water efficiency measures; reducing flood risk is uncertain given high levels of development	Permanent	<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 ▪ Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues. ▪ Infrastructure Delivery Plan updates
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates					

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+/?	+/?	Long-term in terms of funding and identifying and occupying new sites; short –medium term with regards to bring vacant buildings back in use	Uncertainty on funding for recycling and reuse centre and meeting London Plan apportionment targets.	Temporary construction waste; otherwise permanent in management facilities once delivered, building back in use	<ul style="list-style-type: none"> • New waste capacity (tonnes) by management type (recycling/composting, recovery, transfer and disposal) and type of wastes handled (HIC and CD&E) • Loss of waste sites to other uses. Location and amount of compensatory capacity • Infrastructure Delivery Plan updates
15. To improve air quality					
?/-	?/+	Localised efforts to improve air quality – medium term Transport infrastructure delivery and Vauxhall 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"> ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Amount of open space lost through completed planning permissions ▪ Change in areas of biodiversity importance ▪ Carbon dioxide emission reductions against Part L building regulation requirements in approved major developments ▪ Infrastructure Delivery Plan updates ▪ Percentage of residents with health problems related to air pollution/quality ▪ Improvement of air quality at the monitoring stations around the Borough
16. 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	
17 & 19. 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"> ▪ Net change in B1a floorspace through completed developments ▪ Net loss of B1a floorspace through completed Prior Approval developments (ie permitted development for change of use from office to residential) ▪ Proportion of major application approvals that make provision for Affordable Workspace (in parts of borough covered by policy ED2) ▪ Net change in completed B1b, B1c, B2 and B8 floorspace in KIBAs and outside KIBAs ▪ Proportion of original ground floor units in A1 retail use in <ul style="list-style-type: none"> a) i) Lower Marsh/The Cut CAZ Frontage, ii) Streatham Primary Shopping Area iii) Clapham Primary Shopping Area. b) Vauxhall District Centre.

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					<p>c) Brixton Primary Shopping area</p> <ul style="list-style-type: none"> ▪ Proportion of vacant units in Brixton and Streatham Major centres, Clapham, Vauxhall and West Norwood District centres and Lower Marsh/The Cut CAZ Frontage ▪ Proportion of original ground floor units in A3/A4/A5 food and drink use in <ul style="list-style-type: none"> i) Streatham; ii) Clapham; and iii) Brixton Primary Shopping Areas ▪ Proportion of original ground floor units in A3/A4/A5 food & drink or nightclub use in Brixton Evening Economy management area ▪ Net additional visitor accommodation bedspaces ▪ Unemployment rates ▪ Number of businesses registered in the Borough ▪ Number of vacant premises in town centres ▪ Total amount of additional employment floor-space, by type ▪ Total amount of employment floor-space, by type ▪ Total amount of floor-space for 'town centre uses'
18. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use 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. ▪ Housing supply: number of net additional dwellings completed

1.0 INTRODUCTION

- 1.0.1 Lambeth Council is currently reviewing parts of its Local Plan 2015. The existing Local Plan, adopted in 2015, contains a strong vision for the development of the borough to improve opportunities for local people. It sets the planning policies for the borough and much of it is still up-to-date and effective. However, changes to national planning law and policy, a full review of the London Plan and changes in Lambeth mean parts of the Local Plan need to be reviewed.
- 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 Revised Lambeth Local Plan October 2018.
- 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 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.
- 1.0.5 The Lambeth Local Plan is part of the statutory development plan for Lambeth, alongside the Mayor of London’s London Plan and any adopted neighbourhood development plans. Together these documents set the policy context for growth and development in the borough and provide the basis for determining planning applications. A London borough local plan must be ‘in general conformity’ with the London Plan. This means the strategy and policy approach should not contradict that established at regional level: borough local plan policies should be used principally to reinforce and add local detail to the London-wide approach. The London Plan is undergoing a full review initiated by the Mayor. The timing of the review of the Lambeth Local Plan has been designed to follow just behind the new London Plan. The Draft London Plan 2017 has itself been subject to an integrated impact assessment. This combined four assessments into one document: Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Community Safety Impact Assessment (CSIA) and Equality Impact Assessment (EqIA). The integrated impact assessment has been referred to in the preparation of this SA on the Draft Revised Lambeth Local Plan October 2018.
- 1.0.6 The overall aim of the appraisal process is to help ensure that the Draft Revised Lambeth Local Plan October 2018 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 2018 constitutes the Government's view of what sustainable development in England means in practice for the planning system. 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 Revised Lambeth Local Plan October 2018, the purpose of an SA Report and the supporting legislative requirements.

Section 2 – Draft Revised Lambeth Local Plan outlines the documents that make up the Local Plan and describes in more detail the draft 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 Revised Lambeth Local Plan October 2018, and the difficulties encountered.

Section 4 – Characterisation and SA framework provides an overview of the character of Lambeth Borough and describes the process taken to developing the SA framework against which the Draft Revised Lambeth Local Plan October 2018 was assessed.

Section 5 – Appraisal of the Draft Revised Lambeth Local Plan October 2018 is the most noteworthy section of this report. Despite only very minor changes proposed for the draft revised Local Plan objectives (related to updating, factual information) and that the objectives have already been appraised in the SA on the Lambeth Local Plan 2015; 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 each 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 Draft Revised Lambeth Local Plan October 2018;
- Likely significant effects of implementing the Draft Revised Lambeth Local Plan October 2018 policies 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 Revised Lambeth Local Plan October 2018, the predicted significant sustainability effects, and an overview concluding analysis of the main issues of concern in the Draft Revised Lambeth Local Plan October 2018.

1.2 Equality Impact Assessment

1.2.1 It is 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 on different equalities groups, (ie. ethnicity, gender, gender re-assignment, disability, age, sexual orientation, religion or belief, socio-economic factors, marriage and civil partnership, pregnancy and maternity, language, health). 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

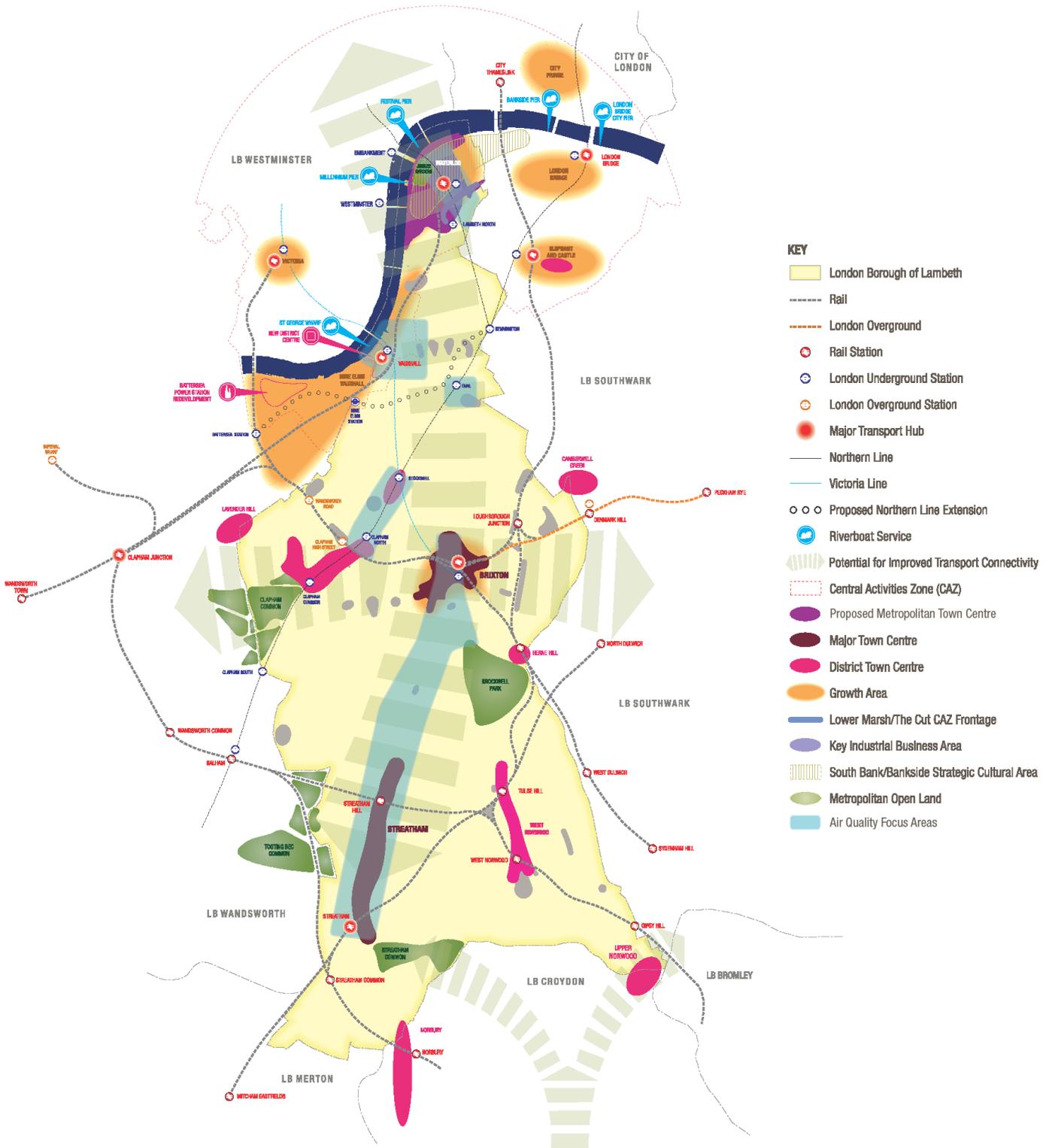
1.3.1 As with the EqIA, the Health and Well-being Impact Assessment is integrated into the SA; an approach previously adopted in the SA on the Lambeth Local Plan 2015, which was discussed and agreed with NHS Lambeth. In addition, the Lambeth public health team have had a role in the preparation of the SA by providing current health statistics for the Borough and up-to-date guidance and documents on public health. The public health team were also given an opportunity to comment during the preparation of the Draft Revised Lambeth Local Plan October 2018 and advised about evidence for aspects of policy development. The Lambeth Clinical Commissioning Group (CCG) have been engaged in preparation of the Infrastructure Delivery Plan for the Local Plan review.

1.4 Habitat Regulations Assessment

1.4.1 The council has undertaken a Habitat Regulations Assessment – Screening Analysis on the Draft Revised Lambeth Local Plan October 2018 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 Revised Lambeth Local Plan October 2018 does not identify any likely significant adverse effects on any European Site. Similarly it is considered that the Draft Revised Lambeth Local Plan October 2018 will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the Draft Revised Lambeth Local Plan October 2018.

2.0 DRAFT REVISED LAMBETH LOCAL PLAN

- 2.0.1 The Lambeth Local Plan is part of the statutory development plan for Lambeth, alongside the Mayor's London Plan and any neighbourhood plans that may be adopted. Together these documents set the policy context for growth and development in the borough and provide the basis for determining planning applications. The procedure for preparation and review of Local Plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.0.2 The current Lambeth Local Plan was adopted by the Council in September 2015, following a statutory process of preparation and examination. The Inspector for the Local Plan examination found it sound subject to early review to take account of the higher borough-level housing target in the Further Alterations to the London Plan 2015, which had been published too late to be included in Lambeth's Local Plan 2015. In May 2016 the new Mayor of London was elected and he immediately initiated a full review of the London Plan. This will replace the version referred to in the Lambeth Local Plan Inspector's report, so the impetus for review of the Lambeth Local Plan changed: it now needs to address changes in the emerging new London Plan rather than the alterations to the previous London Plan.
- 2.0.3 In addition, since September 2015 there have been a number of significant changes to the national planning policy and legislative context, and others are emerging. These include the Housing and Planning Act 2016, the introduction of permissions in principle, ongoing changes to permitted development rights, national commissions into the local plan making process, consultation on the changes to the National Planning Policy Framework, the Neighbourhood Planning Act 2017, the Housing White Paper 2017 and consultation on the policy approach to Build to Rent. The government is expected to publish a revised National Planning Policy Framework by Autumn 2018. These changes will also need to be addressed by the review of the Lambeth Local Plan.
- 2.0.4 Like all Development Plan Documents, 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.
- 2.0.5 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 2035. It is based on the social, economic and environmental objectives and priorities of the Lambeth Borough Plan 2016-2021, together with other relevant plans, programmes and strategies all of which have implications for the development and land use within the borough.
- 2.0.6 The spatial framework for future development and land use within the borough is outlined in the spatial strategy and shown in Map 1 below – the Draft Revised Lambeth Local Plan October 2018 Key Diagram. 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.



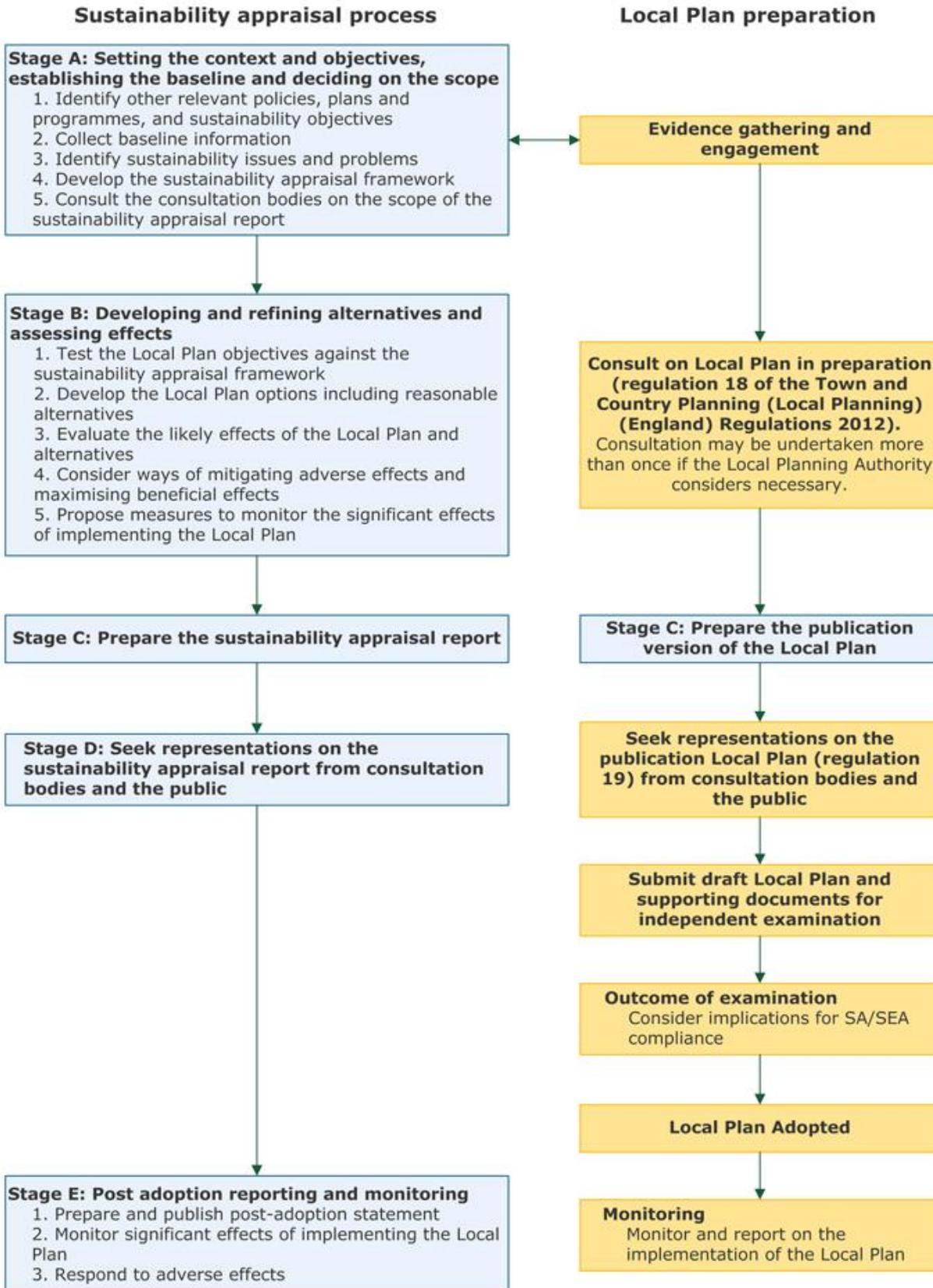
3.0 SA/SEA METHODOLOGY

- 3.0.1 This report presents the sustainability appraisal work on the Draft Revised Lambeth Local Plan October 2018. The SA process will assist in determining the impact the draft revised 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 final Local Plan to be adopted 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 Revised Lambeth Local Plan October 2018 to provide the 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 Revised Lambeth Local Plan October 2018.
- 3.0.4 Table 1 below outlines the five stages of producing a SA report and Figure 1 below provides further detail and also sets out the local plan process that occurs simultaneously. All of Stage A (Scoping Report 2016) and points 1 and 2 of Stage B (SA Issues and Reasonable Alternatives October 2017) have been completed previously. This draft SA Report on the Draft Revised Lambeth Local Plan October 2018 addresses the remaining points in Stage B and Stage C (see figure 1).

Table 1: SA process and outputs

FIVE STAGES OF THE SA REPORT	Outcome
SA Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	Scoping Report 2016
SA Stage B: Developing and refining options and assessing effects	SA Issues and Reasonable Alternatives October 2017
SA Stage C: Preparing the Sustainability Appraisal Report	Draft Sustainability Appraisal Report October 2018
SA Stage D: Consulting on the reasonable alternatives of the DPD and SA Report	SA Issues and Reasonable Alternatives October 2017 and Draft Sustainability Appraisal Report October 2018
SA Stage E: Monitoring the significant effects of implementing the DPD	

Figure 1: Sustainability appraisal process and local plan preparation



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 draft 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 draft SA of the Draft Revised Lambeth Local Plan October 2018.

Table 2: Checklist of SEA requirements contained in the draft 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 2016
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Sections 4 and 5*
c) the environmental characteristics of areas likely to be significantly affected;	Sections 4 and 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);	Sections 4 and 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 draft Scoping Report was made available for comment to statutory consultees Natural England, Environment Agency and Historic England. Consultation was over a five-week period from March to April 2016. The draft Scoping Report provided a summary of the current environmental, social and economic conditions in Lambeth (baseline information and the

proposed Sustainability Appraisal Framework). Given that the current Draft Revised Lambeth Local Plan October 2018 process involves only a partial review of some elements of the recently adopted Lambeth Local Plan, the Scoping Report drew upon and further updated previous sustainability appraisal work undertaken through the Lambeth Local Plan 2015 preparation process, including the Sustainability Appraisal Framework. Responses were received from all three statutory consultees (see Appendix 3.3) and their responses were taken into account in updating the final version Scoping Report (2018) which is published alongside this draft SA Report on the Draft Revised Lambeth Local Plan October 2018 (see Appendix 3).

3.2.2 Appendix 3.3 sets out the responses that were received and the action that has been taken as a result.

3.2.3 In October 2017 an initial sustainability appraisal was prepared for the Lambeth Local Plan Review Issues and Reasonable Alternatives. The SA assessed each reasonable alternative identified for the local plan issues against the sustainability objectives established through the preparation of the Scoping Report. The main environmental, social and economic implications of each alternative 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.

3.2.4 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 Autumn 2019.

3.3 Assumptions and Difficulties encountered

3.3.1 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 sustainability objectives set out in the Scoping Report. 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 in 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 this draft SA report will add value to the process 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 Draft Revised Lambeth Local Plan October 2018 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 Draft Revised Lambeth Local Plan October 2018 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 Revised Lambeth Local Plan October 2018 and this draft SA Report are available for public comment for a period of eight weeks. Notification of the availability of these documents is in line with the Statement of Community Involvement 2015, the Town and Country Planning Regulations 2012 and the Consultation and Engagement Plan prepared for the Lambeth Local Plan Review issues consultation, 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 Revised Lambeth Local Plan October 2018 and State of the Borough Report 2016 (which draws upon 2011 Census). More detailed information on the borough is provided as baseline data against the sustainability objectives of the Draft Revised Lambeth Local Plan October 2018 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 the 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, currently providing a total area of 48 hectares over 28 KIBAs in the borough. (The Draft Revised Lambeth Local Plan October 2018 proposes changes to KIBAs which if approved will result in a total area of 43 hectares over 29 KIBAs.)
- 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 100 people living in each hectare, more than twice the London population density. Nearly a third of a million people live in Lambeth – at least 318,000. It has a complex social and ethnic mix, with large African and Portuguese populations, and is an important focus for the UK black Caribbean population. The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. Lambeth is the 8th most deprived borough in London and 22nd most deprived in England. This is an improved relative position since 2010 when Lambeth was ranked as the 14th most deprived authority in England. The most deprived places in the borough are mostly in Brixton and Stockwell, with some in Knight's Hill.
- 4.0.6 Lambeth is an important part of the London economy, particularly in providing homes for young, skilled workers. There are 140,500 people employed in Lambeth, with a significant concentration of jobs in the north of the borough. The borough has relatively few jobs: the biggest sectors for employment within Lambeth are human health and social work and administrative and support services. Residents are more likely to be in employment than the London average. Whilst unemployment in 2014 was the lowest in ten years, there was an increase from 6% to 7% in

2015, which is still amongst the lowest in the last decade. However, this masks sharp disparities across the borough. Overall, employment rates are significantly higher for white Lambeth residents than for those from Black and Minority Ethnic (BME) backgrounds. 85% of white working age residents were in employment compared to 66% of BME working age residents. Lambeth's population is highly skilled, but those who are not risk missing out on the opportunities created by growth.

- 4.0.7 Lambeth has a relatively young age profile. Although it is a largely residential borough, it is a destination for young working age people, rather than families. The male and female populations have different age profiles. The young working age population is roughly even between males and females. For all ages over 50, there are slightly more females than males. This reflects national trends.
- 4.0.8 If trends continue, Lambeth's population is projected to grow by just over 1% per year for the next five years, and just under 1% for the five years after that. The borough will continue to have a majority of young working age people (20-44). Although the UK population's older population is projected to increase, this will affect Lambeth less than places which are destinations for older people. Lambeth's population aged 60+ is projected to grow by a quarter in the next 10 years, compared to a 10% growth across the whole population. There are substantial differences between ethnic groups. For example, the black Caribbean 60+ population is projected to grow by almost 40%. Similarly, the older black African population, which is currently small, is projected to nearly double. The older white population, which is larger, is projected to grow by about 12%.
- 4.0.9 Although Lambeth is a largely residential borough with many long term residents, the proportion of people moving in and out of the borough is high, similar to many places in inner London. Approximately 12% of the population leave each year and are replaced by around 12% new arrivals. In other words, around 88% of the population each year remains the same.
- 4.0.10 There are around 136,000 households in Lambeth. Family households – couples with or without children – make up 29% of Lambeth's households. Lone parents make up 15% of households. Single person households make up 34% and others, such as working age house-sharers, account for 21% of households (Census 2011). If current trends continue, the number of households will rise by 30,000 between 2011 and 2031. Around 65% of households live in rented accommodation, and a third own their own home. Just under one in five households rent from the council, and around 16% rent from other social landlords. Just under one in three households are privately rented. In recent years, there has been a noticeable increase in concern about lack of affordable housing. Over 70% of households in Lambeth live in flats, either purpose built or converted houses. Just over 10% of households live in detached or semi-detached houses (Census 2011).
- 4.0.11 Around 40% of Lambeth's population is white with a UK background. White people make up 59% of the population. Around 40% of Lambeth residents are White British or Irish, in line with inner London (43%). 15% of the population are from other White backgrounds – around 47,000 people. About two thirds of these people are from Europe outside the UK & Ireland, 8% are from central and south America, 4% from North America and the Caribbean, and 8% from Australasia.
- 4.0.12 Black people make up a quarter of the population (25%). Lambeth's largest non-white ethnic group is black African (11.5%), followed by black Caribbean (9.8%). Lambeth has the second largest proportion of black Caribbean people in London (9.5%) after Lewisham (11%). Lambeth has a small Asian population compared to many places in London. Only 7.8% of Lambeth residents are from Asian backgrounds (including Chinese), much less than the inner London average (14.5%). Around 150 different languages are spoken in families in the borough. Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages.

- 4.0.13 Estimates suggest that Lambeth has one of the largest Lesbian Gay Bisexual and Transgender (LGBT) populations in London.
- 4.0.14 Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents with a religion.
- 4.0.15 About 37,000 people in Lambeth have their day-to-day activities limited by a long term illness or disability. About 60% of people with a limiting health condition are aged over 50.
- 4.0.16 There are an estimated 49,000 people in poverty in Lambeth before housing costs, and 87,000 people in poverty after housing costs. A third of working age people and a quarter of people of retirement age in Lambeth are living in poverty. However, Lambeth is not one of London's most impoverished boroughs.
- 4.0.17 Public transport provision in the Borough is generally good, with 14 over-ground 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.
- 4.0.18 The diverse character of Lambeth Borough has given rise to a number of complex spatial issues that have been addressed in the Draft Revised Lambeth Local Plan October 2018 (Table 3).

Table 3: Key Sustainability Issues in Lambeth Borough

Lambeth key issue	London key issue ²	Notes – KEY ISSUE SUMMARY
Increase the overall supply and mix of housing , including affordable housing. Capacity for conversions.	Lack of affordable housing; Under-supply of homes which meet the needs of Londoners (size, type, tenure); High level of approvals, low level of completions; Increasing costs of housing relative to wages; Homelessness; Implications from major Government reforms to housing legislation and policy	Access to good housing; Affordable housing; Sustainable housing; Housing mix, types, tenures.
Conserve, protect and enhance heritage assets , their settings and the wider historic environment as part of reinforcing local distinctiveness and place-making	Heritage assets at risk from neglect, decay, inappropriate development and air pollution; Views and vistas to heritage assets are at risk from increased development pressures; Potential harm to the significance of heritage assets and wider historic environment through inappropriate development.	Built heritage; Views and vistas.
Provide the essential infrastructure to support population growth.	Significant increase in the population; Young profile; Ageing and more diverse population; Uncertainty of the composition of the population, including migration patterns; Insufficient school places to meet growing needs; Increased pressure on London's infrastructure as a result of growth and increased economic activity;	Infrastructure provision, including healthcare services and facilities; digital connectivity and schools.

² Taken from IIA of London Plan (Nov 2017)

Lambeth key issue	London key issue ²	Notes – KEY ISSUE SUMMARY
	Lack of high speed and efficient connectivity (digital) across all parts of London; Need to improve sewer and wastewater infrastructure capacity	
Develop mixed, cohesive, safe communities accessible to all.	Increasing aging and diverse population; Persistent causes of Multiple Deprivation High levels of poverty in some parts of London, with rates of child poverty continuing to exceed national levels; Discrimination; Isolation; Population churn and impact on community cohesion; Gentrification; Increased threat of major incidents and unplanned events; Perceptions of lack of safety; Fear of crime creating barrier to activities leading to increased social isolation; Vulnerability of different groups of people at greater risk of crime; More vibrant night-time economy leading to increased risk of crime	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.
Provide good access to local services and community facilities within neighbourhoods. Increase public transport accessibility and promote walking and cycling.	Poor orbital connectivity by all modes of public transport in outer London; Poor connectivity across the River Thames in east London; Reduced transport connectivity across London as a result of congestion and overcrowding on services and roads; Reduced connectivity across London by walking as a result of congestion and overcrowding on pavements and footpaths; Increasing airport capacity will impact on the spatial and economic fabric of the city; Barriers to using public transport; Poor design of the built environment; Loss of pubs, cinemas, creative workspace, live music and other cultural facilities and risk of harm to heritage assets; Inequality in access to cultural venues	Good local access to services and facilities; Tackling congestion; Increase public transport use, accessibility and provision, cycling and walking.
Increase the number and variety of jobs in the local economy , including local jobs for local people.	Disparities between rates of employment among London's residents; Disparity between wages and cost of living; Lack of diversity in jobs provided; Growth of low paid employment and zero hours contracts; Lack of support for transition from education to work, especially for young women; Large variations in educational performance across London	Increasing jobs, particularly local jobs for local people; Addressing high rates of child poverty; Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups; Tackling barriers to employment; London's role in the UK economy.
Support the growth of key economic sectors through new business development, business retention and inward investment.	Changing global economy; London's Productivity; Potential loss of agglomeration benefits;	New business development; Business retention; Inward investment; Digital connectivity

Lambeth key issue	London key issue ²	Notes – KEY ISSUE SUMMARY
	<p>Increased pressure on London's infrastructure as a result of growth and increased economic activity; Risk that infrastructure could constrain economic growth; Lack of high speed and efficient connectivity (digital) across all parts of London; Loss of employment land as a result of increased pressure for housing; Insufficient amount of floorspace available to meet identified needs; Affordability of business space, particularly for small and medium sized enterprises and start-ups</p>	<p>Targeting key economic sectors.</p>
<p>Create viable, safe and well managed town centres:</p> <ul style="list-style-type: none"> ▪ Brixton ▪ Streatham ▪ Clapham ▪ Stockwell ▪ West Norwood / Tulse Hill <p>Support the regeneration of Vauxhall and Waterloo Opportunity Areas</p>	<p>Impact of mixed use development – night-time economy and residents; Impact on town centres as a result of a reduction in demand for retail floorspace; Poor quality public realm in some parts of London which can discourage active travel; Risk of poor design, harm to the distinctive character of places lack of legible neighbourhoods and sense of place</p>	<p>Viable, safe and well managed town centres.</p>
<p>Support the regeneration and renewal of London Plan Opportunity Areas.</p>	<p>Development and Regeneration. The sustainable development and regeneration of London, including addressing areas of deprivation and generating a lasting and sustainable legacy from the Olympic Games, particularly for East London communities. The Opportunity and Intensification Areas offer significant potential for sustainable development to meet London's housing and employment needs.</p>	<p>Regeneration of London Plan Opportunity Areas.</p>
<p>Reduce carbon emissions from residents, businesses, public services and buildings.</p> <p>Implement measures to help Lambeth adapt to the consequences of inevitable climate change, including flood risk management</p>	<p>London is not currently meeting the Mayor's CO₂ emission target; Transport will continue to contribute significantly to CO₂ emissions; CO₂ emissions from buildings continue to rise; London is no longer a global leader in terms of transitioning towards a low carbon economy; Increase in extreme weather events such as flood risk, drought and heat risk and associated impacts; Changing demographics such as an ageing population and more under five year olds increasing the number of potentially vulnerable people; Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect; Risk of flooding to property and people from river, surface water, tidal, sewer, ground water and reservoir; Increase in run-off and potential contamination and disruption of flows; Necessary infrastructure needs to be planned for, funded and implemented to support growth and development</p>	<p>Reducing CO₂ emissions.</p> <p>Climate change adaptation, including flood risk management</p>

Lambeth key issue	London key issue ²	Notes – KEY ISSUE SUMMARY
<p>Maximise the efficient use and management of resources, including water, energy and waste.</p>	<p>Inability for London to accommodate required growth within its boundaries; Unsustainable patterns of development within and across London's boundaries; Higher densities development; Competing pressures for land impacts on ability to provide social, physical and environmental infrastructure; Non-efficient use of land; Integration of land use and transport; Spatial impact and consequential development pressures resulting from decision on London's future airport capacity; Relatively high and ineffective use of fossil fuels contributing towards London's GHG emissions and air pollution; Insufficient low carbon energy supply; High number of Londoners in fuel poverty. Energy-inefficient building stock & transport; Un-utilised local energy resources; Need to manage peak electricity demand Need to reduce per capita water consumption; Need to plan for and deliver additional new water resources; Need to improve the quality of water in London's waterbodies; Need to improve the physical form of London's waterbodies; Need to improve sewer and wastewater infrastructure capacity; Increasing pressure on waste sites and infrastructure including wharves in London to meet demand; Wasteful economy increasing disposal costs and climate change impact; Low municipal waste recycling rate and inconsistent recycling service provision falling short of stretching recycling targets; Fragmented waste governance resulting in inconsistent recycling service provision and performance across London; Likely increase in waste arisings in particularly construction materials to meet the needs of London's growing population; Threat to London's geodiversity as a result of increased demand for development; Modifications to the landscape and subsequently geomorphological processes; Remediation of contaminated land</p>	<p>Efficient use and management of resources; Efficient use and management of water: addressing increasing demand; Efficient use and management of energy; Efficient use and management of waste: increasing recycling rates and self-sufficiency in waste disposal; Pressure on biodiversity and open spaces.</p>
<p>Health and well-being, including air quality</p>	<p>Increasing health inequalities across the population; Londoners are living with complex health needs for longer period;</p>	<p>Improving air quality (and meeting EU targets); Addressing health inequalities and the health needs of Lambeth's</p>

Lambeth key issue	London key issue ²	Notes – KEY ISSUE SUMMARY
	<p>Increasing and changing pressure on the health services and service provision; Differentials in life expectancy and healthy life expectancy across London; Widening social inequalities; Low levels of physical activity and increasing obesity levels across the population; High levels of NO_x, PM₁₀ and PM_{2.5} emissions from road transport; Little to no predicted reduction in PM₁₀ and PM_{2.5} emissions from road transport between 2013 and 2030; London is not compliant with legal limit values for NO₂; Large numbers of the population are exposed to levels of NO₂ above the EU limit value; Exposure to poor air quality is unequal across London and some areas are more exposed to poor air quality than others; The health impacts of air pollution include: an increased risk of early death as well as whole-life impacts on lung function, lung health and increased susceptibility to cardiovascular diseases, respiratory cancer, stroke, asthma and COPD; Parts of the population are exposed to roadside and railway noise that exceeds the threshold; Increasing noise levels from night-time economy, freight movement and deliveries associated with mixed use development; Lack of quiet and tranquil places for relaxation and enjoyment.</p>	<p>existing and new residents.</p>
<p>Biodiversity, open space and green infrastructure</p>	<p>Loss of biodiversity and reduced ecological resilience as a result of increased pressure for development and intensification of existing development; Decrease in Areas of Deficiency in Access to Nature and increased recreational pressure on existing habitats and green spaces; Deficiencies in open spaces in some parts of the city; Impact of climate change and threat of new pests and diseases; Poor connectivity to green infrastructure for all</p>	<p>Protect and enhance existing open spaces, biodiversity and green infrastructure; Increase amount of open space and green infrastructure.</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 3.3). This SA Framework has been used to test the spatial strategy and vision, strategic objectives, policies and options for the Draft Revised Lambeth Local Plan October 2018.

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 19 (economic stimulation) may result in potential tensions with objectives 10 to 15 (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	SEA topic requirement
SOCIAL		
1. Crime and safety. Ensuring safe communities with reduced crime and disorder.	Will the strategy/policy... <ul style="list-style-type: none"> • reduce the opportunities to commit crime and engage in antisocial behaviour? • help address the fear of crime as well as crime itself? • create the conditions for communities to develop which will support a reduction in crime and the fear of crime? • reduce Lambeth's vulnerability to major challenges such as climate change and water shortages? • reduce Lambeth's vulnerability to terrorist action? • reduce the need for motorised travel? • encourage walking and cycling, for instance by reducing traffic accidents to pedestrians and cyclists? 	Population
2. Health and well being. Promote a healthy borough, by reducing health inequalities and the causes of ill health.	Will the strategy/policy... <ul style="list-style-type: none"> • protect health and wellbeing? • reduce poverty, including child poverty and the impact of income inequality? • help reduce health inequalities? • help improve mental, emotional and physical health, and wellbeing? • encourage the development of healthy neighbourhoods? • make walking and cycling more attractive relative to other alternatives? • improve access to health care services? • help people be healthier, for longer 	Population, Human Health

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	<ul style="list-style-type: none"> • help people to live an inclusive and active lifestyle? • promote a sense of wellbeing? 	
<p>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>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • Improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel? Including: <ul style="list-style-type: none"> • Schools • Nurseries • GPs and hospitals • Libraries • Places of worship • Food shops (especially those selling fresh, healthy food) • Community centres • Children's play areas • Sports and recreation facilities • Open spaces and wildlife habitats • Police and emergency services • Banking facilities and post offices • help older, disabled and vulnerable people live independently and have control over their lives? • help vulnerable children and adults get support and protection? 	Population, Human Health
<p>4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • Ensure that appropriate infrastructure keeps pace with population growth, in particular: <ul style="list-style-type: none"> ○ water and sewerage infrastructure ○ health 'infrastructure' (facilities and services) ○ schools ○ green infrastructure ○ flood defences ○ transport. 	Population, Human Health, Material Assets
<p>5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • promote a culture of equity, fairness and respect for people and the environment? • improve environmental conditions for Lambeth's deprived areas and deprived communities? • reduce poverty and social exclusion? • Remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination? • promote social cohesion within and between population groups? • enable social integration between minority groups and wider society? • address housing, cultural, social and employment needs of those with protected characteristics? • promote adequate accessibility, in particular for older and disabled people? 	Population, Human Health
<p>6. Housing. Ensuring everyone has the</p>	<p>Will the strategy/policy...</p>	Population, Human Health,

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<p>opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<ul style="list-style-type: none"> • increase access to good housing? • promote increased supply of housing? • Increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)? • meet affordable housing targets? • meet sustainable housing standards? • increase the mix and type of housing, including family units?. • reduce actual noise levels and disturbances from noise? • tackle homelessness and overcrowding? • provide housing that ensures a good standard of living and promotes a healthy lifestyle? • provide Lambeth residents with more opportunities for better quality homes? 	<p>material Assets</p>
<p>7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • protect and 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 places? • promote Lambeth as a place that people want to put down roots rather than just pass through? • support the provision of quality, affordable and healthy food? • help all Lambeth communities feel they are valued and are part of their neighbourhoods? • encourage people to take greater responsibility for their neighbourhood? • help people lead environmentally sustainable lives? 	<p>Population, Human Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)</p>
ENVIRONMENTAL		
<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"> • protect, conserve and enhance sites, features and areas of historical, archaeological and cultural value/potential and their settings? • enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals)? • respect visual amenity and the spatial diversity of communities? • aspire to a range of buildings and architecture that reflect the cultural diversity of the borough? • protect 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? 	<p>Landscape, Cultural Heritage (including architectural and archaeological heritage)</p>

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	<ul style="list-style-type: none"> • protect, enhance or create open space? • protect valued views? • identify locations where tall building are acceptable? 	
9. Transport and travel. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • reduce overall need for people to travel by improving their access to local services, jobs, leisure and amenities. • encourage a modal shift to more sustainable forms of travel: walking, cycling and public transport as well as encourage efficiency (e.g through car sharing)? • encourage greater efficiency in the transport network, such as through higher load factors? • integrate new development, especially residential development, with sustainable transport choices? • improve accessibility to work by public transport, walking and cycling? • reduce road traffic accidents, especially involving cyclists? 	Population
10. Biodiversity. To protect, enhance and promote biodiversity, and to bring nature closer to people.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national, London or Lambeth priority species and designated sites)? • Improve the quality and extent of designated and non-designated sites? • 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? • bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens? • provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)? • Improve access to areas of biodiversity interest? • Enhance the ecological function and carrying capacity of the green space network? • Promote a network of green infrastructure? 	Biodiversity, Flora, Fauna, Landscape, Soil, Water
11. Green infrastructure. To create, manage and enhance green infrastructure.	<ul style="list-style-type: none"> • protect existing green infrastructure or open spaces? • enhance/create good quality and accessible green infrastructure or open spaces? • promote increased access to green infrastructure where appropriate 	Biodiversity, Flora, Fauna, Landscape, Soil, Water, Climatic Factors
12. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • help minimise emissions of greenhouse gases? • increase the proportion of energy both produced and used from renewable and sustainable resources? • reduce demand and need for energy? • reduce the impacts of climate change? e.g. urban heat island effect, flooding and drought? • ensure adaptation to the future impacts of climate change? 	Climatic Factors, Materials Assets

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for the unavoidable effects of climate change.	<ul style="list-style-type: none"> • help 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? • promote high standards of energy and environmental performance for new and existing buildings? • minimise embedded carbon in new buildings and development? 	
13. 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>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve the quality of water and waterbodies (surface and groundwater)? • 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? • 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? 	Water, Climatic Factors
14. 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>Will the strategy/policy...</p> <ul style="list-style-type: none"> • 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? • make appropriate provision for waste management facilities in the Borough to help meet the London Plan apportionment and self sufficiency targets? 	Population, Material Assets
15. Air quality. To improve air quality.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve air quality? • reduce emissions of greenhouse gases? • reduce emissions of 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 2010) as well as local air quality management targets? • support the planting of trees? • promote the 'transport hierarchy'? 	Air, Human Health
ECONOMIC		
16. 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"> • improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages? • contribute to up-skilling and to meeting skills shortages? • promote healthy, sustainable living? • Provide people with the skills to find work? 	Population, Material Assets, Human Health

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<p>17. 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> <p>This should also support the development of an efficient, low carbon economy (including new green technologies) that minimise unsustainable resource use.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve the resilience of business and the economy e.g. through supporting 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? • support development of green industries and a low carbon economy? • support and prevent loss of local businesses? • encourage business start-ups and support the growth of businesses? • Help Lambeth play a strong role in London's economy? 	<p>Population, Material Assets</p>
<p>18. 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, taking into account constraints such as contaminated land.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • have benefits to the most deprived areas and communities? • help make people feel positive about the area they live in? • help reduce the number of vacant and derelict buildings? • make best use of scarce land resources and reuse brownfield sites? • promote the efficient, innovative and multifunctional use of land? • ensure the provision of adequate quantities and type of public realm? • protect the Borough's soil resource? 	<p>Material Assets, Soil</p>
<p>19. 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"> • improve accessibility to employment, especially for local people? • improve employment opportunities among Black, Asian, Ethnic and Minority groups? • protect local employment land and uses? • provide additional housing near places of work? • Help people achieve financial security? • Help all young people have opportunities to achieve their ambitions 	<p>Population, Material Assets</p>

5. LIKELY SIGNIFICANT EFFECTS OF THE DRAFT REVISED LAMBETH LOCAL PLAN OCTOBER 2018

5.0.1 This section sets out the likely significant effects, both positive and negative, identified in the appraisal work on the Draft Revised Lambeth Local Plan October 2018 objectives, policies and reasonable alternatives.

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)).

Assessing significance

5.0.3 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 REVISED LAMBETH LOCAL PLAN OCTOBER 2018 OBJECTIVES APPRAISAL

5A.1 The strategic objectives set out how the Draft Revised Lambeth Local Plan October 2018 vision will be delivered. These strategic objectives underpin the more detailed Draft Revised Lambeth Local Plan October 2018 policies; therefore it is necessary to appraise the Local Plan objectives for compatibility with the SA objectives. The Draft Revised Lambeth Local Plan October 2018 objectives remain largely unchanged from the adopted Lambeth Local Plan 2015, save for very minor changes related to updates and factual information. 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 much from the SA undertaken in October 2013 on the submission version Lambeth Local Plan. Assessing the relationship between SA objectives and the high level strategic objectives helps 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)

Table 5: Compatibility of Draft Revised Lambeth Local Plan October 2018 Objectives and SA Objectives

SA objectives →																			
Local Plan objectives ↓	1. Safety	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	8. Built Heritage	9. Travel	10. Biodiversity	11. Green Infrastructure	12. C.Change	13. Water	14. Waste	15. Air quality	16. Ed & Skills	17. Local economy	18. Regeneration	19. Worklessness
1. Housing	✓	✓	? (2)	? (3)	✓	✓	✓	? (7)	✓	? (12)	? (16)	? (20)	? (25)	? (30)	? (35)	✓	✓	✓	✓
2. Economy	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	? (21)	? (26)	? (31)	? (36)	✓	✓	✓	✓
3. Jobs	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	? (22)	? (27)	? (32)	✓	✓	✓	✓	✓
4. Air quality and carbon emissions	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0/? (33)	✓	✓	✓	✓	✓/? (42)
5. Biodiversity	0	✓	✓	✓	0	0	✓	✓	0	✓	✓	✓	✓	0	✓	0	0	? (40)	0
6. CC Adaptation	✓	✓	0	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	0	✓	0	0	✓	0
7. Infrastructure	✓	✓	✓	✓	✓	✓	✓	? (8)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
8. Transport	✓	✓	✓	✓	✓	0	✓	0	✓	✓	✓	✓	0	0	✓	0	✓	✓	? (43)
9. Schools	0	✓	✓	✓	✓	? (4)	✓	0	✓	? (13)	? (17)	✓	0	0	✓	✓	✓	✓	✓
10. Health	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	✓	✓	✓	✓	✓
11. Open Space	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	0	0	✓	0
12. Waste	0	? (1)	✓	✓	0	x/? (5)	? (6)	? (9)	✓? (10)	? (14)	? (18)	? (23)	? (28)	✓	? (37)	0	✓/x? (39)	✓/x? (41)	✓
13. Cohesion	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	0	✓	✓	✓	✓	✓
14. Safety	✓	✓	0	✓	✓	✓	✓	0	✓	0	0	0	0	0	0	0	0	✓	✓
15. Distinctive local places	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	0	0	0	0	✓	0
16. Historic Environment	0	✓	0	0	0	0	✓	✓	0	0	0	0	0	0	0	0	0	✓	0
17. Opp Areas	✓	✓	✓	✓	✓	✓	✓	✓	? (11)	? (15)	? (19)	? (24)	? (29)	? (34)	? (38)	✓	✓	✓	✓
18. Arts/ Culture	0	✓	✓	✓	0	0	✓	✓	0	0	0	0	0	0	0	✓	✓	✓	✓

5A.2 As expected (given the objectives had previously been appraised as part of the Lambeth Local Plan 2015 SA process), the strategic objectives of the Draft Revised Lambeth Local Plan October 2018 are generally compatible with sustainability principles. Table 5 shows that in general the objectives underpinning the Draft Revised Lambeth Local Plan October 2018 Vision are either compatible or have no relation to the Sustainability Appraisal framework (refer to the Draft Revised Lambeth Local Plan October 2018 for the 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 may be a challenge to locate waste facilities in places that do not impact in some degree on residential areas. In addition, given the competition for land, maintaining 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 measures that seek to avoid or mitigate impacts. The notes below explain the uncertainties (identified by numbers):

1, 6: As briefly outlined above some sites used for waste management and operational use are within or close to 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 Plan policies should seek to mitigate and manage effects.

2-3: Delivery of the 15,890 additional dwellings (minimum) to 2028/29 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 quiet 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 Plan policies will likely address these potential effects.

7-9: Accommodating 15,890 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 Nine Elms Vauxhall is partly 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, funding and delivery of such public transport improvement projects.

12-19, 40: Development pressures for different land-uses including housing, schools, waste sites and regeneration schemes have potential to threaten biodiversity, open spaces and green infrastructure including gardens. Accordingly

potential adverse effects should be avoided or mitigated and the Lambeth Biodiversity Action Plan and Lambeth Green Infrastructure Strategy should be used to guide and inform decisions for activities and redevelopment.

20 – 24: 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 Plan policies should provide further detail on managing and reducing emissions.

25-38, 42: 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 draft London Plan.

39, 41: 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 safeguarded for future waste management use only would be an efficient use of land which promotes efficient, innovative and multifunctional use of land.

43: 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 Draft Revised Lambeth Local Plan October 2018 objectives remains largely unchanged from the Lambeth Local Plan 2015 (that was subject to sustainability appraisals in its formulation); no further recommendations are necessary nor made in this report in relation to the Draft Revised Lambeth Local Plan October 2018 objectives.

5B SPATIAL STRATEGY AND REASONABLE ALTERNATIVES

Spatial Strategy and Strategic Objectives

- 5B.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 can be found on the Local Plan Review Sustainability Appraisal online page as Appendix 5 and the full Report (Appendix 6).
- 5B.2 As the spatial strategy, vision and objectives remain largely unchanged from the adopted Lambeth Local Plan 2015; the commentary and analysis, including appendices, set out in the 'Sustainability Appraisal Lambeth Local Plan Proposed Submission Oct 2013' relating to reasonable alternatives of the spatial strategy and objectives remains relevant. Accordingly the work is not repeated in this SA on the Draft Revised Lambeth Local Plan October 2018 and nor has any additional work been done on them. The final SA and SEA of the Lambeth Local Plan Proposed Submission 2013 has been reviewed in the preparation of this SA and is available on the Local Plan Review Sustainability Appraisal page online (Appendix 4), as is the Sustainability Adoption Statement (Appendix 7).

Reasonable Alternatives of issues for Draft Revised Lambeth Local Plan October 2018

- 5B.3 Reasonable alternative (RA) approaches have been considered in the Draft Revised Lambeth Local Plan October 2018 plan-making process for the key issues considered in the partial review: housing growth and infrastructure; affordable housing; housing for older people; self-build housing; business and jobs; town centres; hotels; waste; air quality; and transport. These issues were explored through a series of topic papers and questions to help facilitate consultation and feedback, with links to further evidence where relevant. The topic papers identified different possible ways (reasonable alternatives) of addressing the key issues. An SA was prepared on the reasonable alternatives (see Appendix 2 Local Plan review evidence October 2018 online) identified in the topic papers/online surveys against the sustainability objectives (SA Framework) that were developed as part of the Scoping Report process. The results of the SA work on the issues and reasonable alternatives has helped inform the Draft Revised Lambeth Local Plan October 2018.
- 5B.4 The policy team has reported that in determining the policy approach to progress for each revised local plan issue, it is important to stress that the SA on the issues and reasonable alternatives was only one consideration, alongside consultation results, evidence and conformity with regional and national policy requirements. In other words, no decision about which option to pursue was made solely on the basis of the SA. Some examples of how the SA on issues and reasonable alternatives has influenced policy approach include:
- *Topic 1: Housing growth and infrastructure*
 - Issue 1 – options 1 and 2 both being pursued on the basis that both make a positive contribution overall to the sustainability of growth in the borough
 - Issue 2 – option 3 pursued, it had the clearest sustainability benefits
 - Issue 5 – option 2 pursued, but the proposed policy incorporates measures to address some of the potential negative impacts raised in

- the SA such as requiring inclusion of a family-sized home and parking controls
- Issue 7 – option 1 pursued, very clear positive impacts on sustainability
 - *Topic 2: Affordable housing*
 - Issue 1 – all options had potential for positive impacts on some SA objectives; option 2 pursued for reasons of general conformity with Draft London Plan, supported by viability evidence
 - Issue 2 – whilst option 2 has potential for negative impacts, the council must pursue this to be in conformity with national planning policy published July 2018. Option 1 is no longer permitted.
 - Issue 6 – option 2 pursued because it offered more positive effects on sustainability objectives
 - Issue 8 – although option 2 offered more positive effects on SA objectives, viability evidence suggests this would not be deliverable
 - *Topic 5: Business and jobs*
 - Issue 1 - the proposed policy combines options 2 and 3 of issue 1 as both have potential for positive effectiveness on SA objectives. The approach was also supported by viability evidence
 - *Topic 6: Town centres*
 - Issue 1 – option 1 was identified as more likely to achieve positive effects. This option has been pursued.
 - Issue 3 (pubs) – option 1 was identified as more likely to achieve positive effects. This option has been pursued.
 - *Topic 7: Hotels and visitor accommodation*
 - Issue 1 - the proposed policy approach combines options 2 and 3 to achieve a balance of positive impacts on differing SA objectives
 - *Topic 8: Air quality*
 - Issues 1 and 2 - all options have been pursued into policy (covered by Draft London Plan policy) as recommended by the SA
 - *Topic 9: Waste*
 - Issue 1 - a combination of options 2 and 3 has been pursued to maximise potential for positive impacts
 - *Topic 10: Transport*
 - Issue 1 - as recommended by the SA options 1, 2 and 3 are all being pursued but option 2 is potentially constrained by feasibility and funding. Option 1 and 3 are particularly stressed in proposed policies
 - Issue 3 – option 3 has been pursued, partly on recommendation of the SA but also to be in conformity with the Draft London Plan – although some Lambeth-specific policy proposed.

5B.5 Consultation was undertaken from October to December 2017 and thirteen representations were received on the SA Issues and Reasonable Alternatives, of

which six made comments on the SA. Some respondents welcomed that an SA had been undertaken and hoped that it had been widely publicised and circulated so that it was read and understood by the majority of residents. One respondent noted it was pleasing to see the rigour attached to some of the environmental criteria, particularly of alternative options for which developments should be assessed for their impact on air quality, but was disappointed that the reasonable alternatives proposed and assessed for the estates regeneration programme did not include a minimum level of accommodation at council rents, given the negative impact of current policy on deprived communities.

- 5B.6 One respondent commented on the SA framework and its prompt questions. In relation to the prompt question on reducing Lambeth vulnerability to terrorist action, the respondent commented that Brixton streets are overcrowded and any incident with a car would have major implications. They also questioned promoting walking as healthy whilst the air quality is so bad, and improving access to libraries whilst closing them down. The respondent also questioned the SA objective of ensuring everyone has 'quiet enjoyment of that home' when there are two flight paths that cross over Brixton, and Lambeth has scaled back its noise control teams.
- 5B.7 One respondent commented with specific reference to Key Industrial Business Areas, most notably Knollys Yard. The respondent considered that the SA had not considered the impact on existing residents to the change of boundaries or new areas. With regards to Knollys Yard, it was considered that there will be a negative impact on residents not just in Knollys Road and Cameron Place but also York Hill which is unsuited to heavy vehicles on the narrow steep railway bridge. The respondent suggested that a sustainable solution to designating Knollys Yard as a KIBA should be to explore an underpass road connection to Leigham Vale. The respondent would be supportive of a mixed-use development that offers community space and affordable business rates for offices along with housing on the Knollys Yard site.
- 5B.8 Historic England commented that they would have liked to see the scoping report alongside the SA report. Historic England made reference to their comments on the Scoping Report 2016, which included suggestions in relation to the baseline evidence, including reference to the work in progress on intervisibility to establish sensitivity in relation to Westminster World Heritage Site. They also recommended reference to characterisation information and a simplified (disaggregated) approach to the historic environment in the SA Framework.

5C POLICIES APPRAISAL

- 5C.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 Draft Revised Lambeth Local Plan October 2018 as a whole against each of the 19 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 Draft Revised Lambeth Local Plan October 2018 has been included to ensure such a negative impact is avoided.
- 5C.2 To assist the SA process on the Draft Revised Lambeth Local Plan October 2018 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 Draft Revised Lambeth Local Plan October 2018 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 Draft Revised Lambeth Local Plan October 2018 policies, and that most policies interact with a number of objectives.
- 5C.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 (national, regional and local).
 - Baseline conditions, existing issues and their likely evolution with the plan.
 - Likely significant effects of implementing the Draft Revised Lambeth Local Plan October 2018 as a whole, taking into account mitigation.
 - Recommendations for monitoring likely significant or uncertain effects.
- 5C.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 Report 2016.
- 5C.5 Where appropriate, recommendations to improve the sustainability performance of policies have been proposed (see Appendix 1).
- 5C.6 The assessment of significant effects of the Draft Revised Lambeth Local Plan October 2018 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. The topic based approach to this SA whereby the draft revised Local Plan as a whole is taken into account also allows distinct identification, consideration and assessment of cumulative effects. Taking into account the Plan period (up to 2035) the following approach has been adopted for the timescales:
- | | |
|--------------|---------------------|
| Short term: | First 5 years |
| Medium term: | 5 years to 10 years |
| Long term: | More than 10 years |
- 5C.7 Table 6 summarises the symbols that have been used in the appraisal of the Draft Revised Lambeth Local Plan October 2018 to show the significance of likely effects

arising from the draft Plan.

Table 6: Key symbols used in the appraisal

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

Table 7: Screening of Draft Revised Lambeth Local Plan October 2018 policies for potential to impact SA objectives

SA objectives →																			
Draft Revised Lambeth Local Plan October 2018 policies ↓	1. Crime	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	8. Built Heritage	9. Travel	10. Biodiversity	11. Green infrastructure	12. C.Change	13. Water	14. Waste	15. Air quality	16. Ed & Skills	17. Local economy	18. Regeneration	19. Worklessness
D1: Monitoring																			
D2: Presumption																			
D3: Infrastructure																			
D4: Obligations																			
D5: Enforcement																			
H1: Housing growth																			
H2: Affordable housing																			
H3: Existing housing																			
H4: Housing size & mix																			
H5: Housing standards																			
H6: Resid. conversions																			
H7: Student housing																			
H8: Specific comm. needs																			
H9: Hostels and HMOs																			
H10: Gypsy & Traveller																			
H11: Estate Regeneratn																			
H12: Build to rent																			
H13: Shared living																			
ED1: Offices (B1a)																			
ED2: Affordable workspc																			
ED3: KIBAs																			
ED4: Non-desig industria																			
ED5: Work-live devmt																			
ED6: Railway arches																			
ED7: Town centres																			
ED8: Evening economy																			
ED9: Public Houses																			
ED10: A2 uses																			
ED11: Local centres																			
ED12: Markets																			
ED13: Visitor attractions																			
ED14: Hotels/visitor acc																			
ED15: Employmt Training																			
SI1: Existing social infrastru																			
SI2: New social infrastru																			
SI3: Schools																			
T1: Sustainable travel																			
T2: Walking																			
T3: Cycling																			
T4: Public transport																			
T5: River transport																			
T7: Parking																			
T8: Servicing																			

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SA objectives →																			
Draft Revised Lambeth Local Plan October 2018 Policies	1. Crime	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	8. Built Heritage	9. Travel	10. Biodiversity	11. Green infrastructure	12. C.Change	13. Water	14. Waste	15. Air quality	16. Ed & Skills	17. Local economy	18. Regeneration	19. Worklessness
T9: Mini-cabs, taxis etc																			
T10: Digital connectivity																			
EN1: Open space/GI/Bio																			
EN2: Food growing																			
EN3: Decentralised energy																			
EN4: Sust. design/constr																			
EN5: Flood risk																			
EN6: Drainage/water mgmt																			
EN7: Sust. waste mgmt																			
Q1: Inclusive environments																			
Q2: Amenity																			
Q3: Safety/crime prevention																			
Q4: Public art																			
Q5: Local distinctiveness																			
Q6: Urban design public realm																			
Q7: Urban design new development																			
Q8: Design quality construction																			
Q9: Landscaping																			
Q10: Trees																			
Q11: Building alterations & extensions																			
Q12: Refuse/recycling strategy																			
Q13: Cycle storage																			
Q14: Developments in gardens																			
Q15: Boundary treatments																			
Q16: Shop fronts																			
Q17: Advertisements/signage																			
Q18: Historic environment																			
Q19: Westminster WHS																			
Q20: Statutory listed buildings																			
Q21: Registered parks																			
Q22: Conservation areas																			
Q23: Local heritage list																			
Q24: River Thames																			
Q25: Views																			
Q26: Tall buildings																			
Q27: Basements																			
PN1: Waterloo/South Bank																			
PN2: Vauxhall																			
PN3: Brixton																			
PN4: Streatham																			
PN5: Clapham																			
PN6: Stockwell																			
PN7: West Norwood																			

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SA objectives →																			
Draft Revised Lambeth Local Plan October 2018 policies ↓	1. Crime	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	8. Built Heritage	9. Travel	10. Biodiversity	11. Green infrastructure	12. C.Change	13. Water	14. Waste	15. Air quality	16. Ed & Skills	17. Local economy	18. Regeneration	19. Worklessness
PN8: Kennington/Oval																			
PN9: Herne Hill																			
PN10: Loughborgh Juctn																			

5C1 CRIME

5C1.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

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

5C1.2 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.

Relevant policy objectives

National Level

5C1.3 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.

5C1.4 With reference to crime, the *National Planning Policy Framework, 2018* states that planning policies should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas (para 92). Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience (para 127).

Regional Level

5C1.5 Draft *London Plan 2018* policy D10 states that:

- A Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment; and
- B Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

5C1.6 *Mayor's office for policing and crime's (MOPAC) Police and Crime Plan 2017-2021* sets out priorities for the safety of London and includes measure to tackle crime and

safety issues, reduce crime and disorder in London and improve police services across the city.

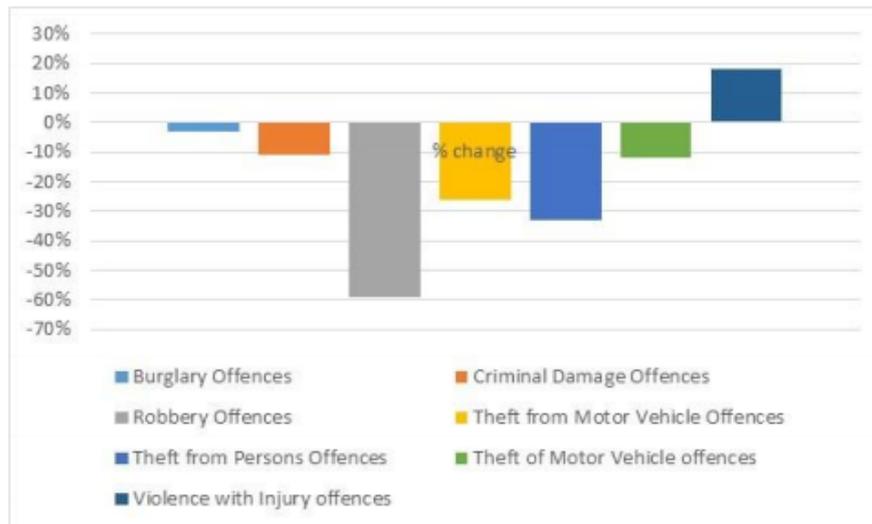
Baseline conditions and existing issues

5C1.7 Lambeth remains a high crime area, amongst the highest London boroughs for several priority crime types, as set by the Mayor’s Office for Policing and Crime (MOPAC). There has been a 24% reduction in these priority crimes since 2012, with significant reductions in these priority crimes in recent years, apart from Violence with Injury. Therefore this needs to be addressed, and regeneration in the borough provides good opportunity to reduce crime and fear of crime.

Crime Types in the borough

Crimes type	Oct 2015 Rank: 1= lowest crime	Offences Apr-12 ⁴⁸	Offences Oct-15
Burglary Offences	24/32	3,773	2,603
Criminal Damage Offences	31/32	3,002	2,654
Robbery Offences	29/32	3,099	1,253
Theft from Motor Vehicle Offences	25/32	2,687	1,963
Theft from Persons Offences	28/32	3,005	1,988
Theft of Motor Vehicle offences	28/32	1,003	882
Violence with Injury offences	32/32	2,964	3,500
MOPAC 7	31/32		

Percentage change in offences from 2012-15



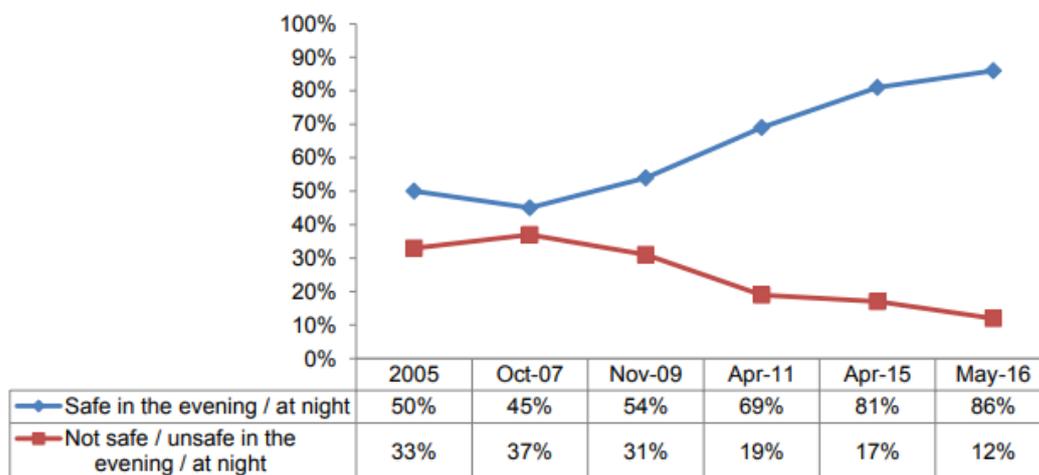
5C1.8 Lambeth has high rates of violent, sexual crime and drug related crime. It has the 6th highest crime rate in London; the 2nd highest rate for Violence with Injury, Sexual Offending and Drugs, and the third highest number of Anti-Social Behaviour (ASB) calls to Police compared to the rest of London. The National Domestic Violence Helpline reports that calls received from Lambeth residents is the third highest in

London, and it is the highest ranking borough in the MPS for reported 'Most Serious Violence against Women'.

5C1.9 Youth re-offending rate remains high, first time entrants to the criminal justice system are increasing and gang related violence remains a problem. Lambeth is one of the riskiest places for teenage males (15 to 19) becoming a victim of crime. Hate crime is increasing; racist offences have increased by 36% and homophobic offences by 34.9% (SOB 2016).

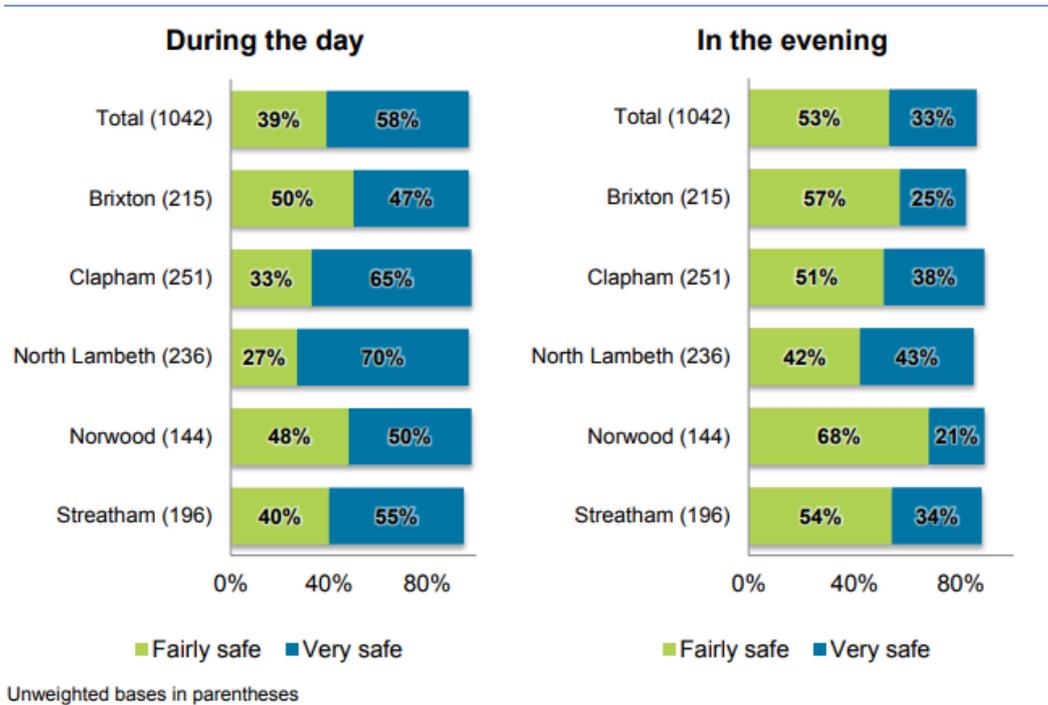
5C1.10 The borough is generally seen as a safe place to live. More than nine in ten residents (97%) agree that they feel safe walking in their local area during the day. This is in line with the 96% observed in 2015. As is common in surveys of this type, the proportion who feel safe walking in their local area in the evening is lower. However, the 86% of residents who feel safe in this context, represents a 5-percentage point increase since 2015 (Lambeth residents survey 2016).

Fig 2: Trends in perceptions of safety over time (Lambeth residents survey 2016)



5C1.11 Within the overall proportion of residents who feel safe in their local area during the day the response of very safe is most commonly given (58%). Breaking responses down further by the five areas that make up the borough, feeling 'very safe' is the most common response in four of these areas. Only in Brixton is the proportion who feel fairly safe (50%) greater than the proportion who feel very safe (47%). In the evening more residents in the borough state that they feel fairly safe (53%) rather than very safe (33%). Only in North Lambeth are the proportions selecting each response in relation to evening safety balanced as shown by the figure below.

Fig 3: Perceptions of safety in the local area during the day and in the evening across the borough (Lambeth residents survey 2016)



5C1.12 Although perceptions of safety are high in the general population it is important to explore whether there are significant variations in the proportions who feel unsafe. Experiences of public spaces can differ in terms of age, gender and ethnicity so it is necessary to view the results in this way. When considering their safety during the day there are only minor variations in the proportion who feel unsafe walking in their local area with no differences evident by ethnicity and gender.

5C1.13 In the evening, a greater number of significant variations are evident. Females are more likely to feel unsafe than males (14% cf. 10%), with the proportion feeling unsafe higher among council tenants (17%), those who live on housing estates (17%) and the most deprived parts of the borough (19%). This is shown in the table below.

Table 8: Who is more likely not to feel safe during the day and in the evening

<u>More likely not to feel safe during the day</u>	<u>More likely not to feel safe during the evening</u>
<p>Overall (2%) IMD quintile 5 (4%) Those aged 45-54 (4%) Those renting from the council (4%)</p>	<p>Overall (12%) Those aged 55-64 (22%) IMD quintile 5 (19%) Black Africans (17%) Those who rent from the council (17%) Those who live on a housing estate (17%) Brixton (16%) Those whose first language is not English (16%) Those of a non-Christian religion (16%) Females (14%)</p>

5C1.14 There is a correlation between how safe from crime people feel, and how they feel about other aspects of their local area. Residents who are dissatisfied with their local area as a place to live are more likely to say they do not feel safe both during the day (10% doing so compared to 2% of residents overall) and also in the evening (37% compared to 12%). Similarly, residents who do not agree the local area is a place where people get on well together are more likely to not feel safe than those who are positive about community cohesion both during the day (15% cf. 2%) and in the evening (30% cf. 11%) (Lambeth residents survey 2016).

Likely future evolution without the Draft Revised Lambeth Local Plan October 2018

5C1.15 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 Draft Revised Lambeth Local Plan October 2018.

5C1.16 However, the built environment will remain, and this is how the Draft Revised Lambeth Local Plan October 2018 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 Draft Revised Lambeth Local Plan October 2018, London Plan policies encourage developers to work with ‘designing out crime’ officers. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council’s ability to guide and shape investment and development will be significantly diminished.

Assessment of draft revised Policies

5C1.17 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 1, crime. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the draft whole Plan on the objective. This review takes account of mitigation already included within the draft Plan.

5C1.18 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring	T4 – Public transport infrastructure
D2 – Presumption in favour of sustainable development	T5 – River transport
D3 – Infrastructure	T7 – Parking
D4 – Planning obligations	T9 – Mini-cabs, taxis and private hire vehicles
H1 – Maximising housing growth	Q3 – Safety, crime prevention and counter terrorism
H3 – Safeguarding existing housing	Q6 – Urban design / public realm
H5 – Housing standards	Q7 – Urban design / new development
H6 – Residential conversions	Q12 – Refuse / recycling storage
H9 – Hostels and HMOs	Q13 – Cycle storage
H11 – Estate regeneration	Q15 – Boundary treatments
ED6 – Railway arches	Q16 – Shop fronts
ED7 – Town centres	PN1 – Waterloo
ED8 – Evening economy and food and drink uses	PN2 – Vauxhall
ED9 – Public Houses	PN3 – Brixton
ED10 – A2 uses	PN4 – Streatham
S11 – Safeguarding existing social infrastructure	PN5 – Clapham
S12 – New or improved social infrastructure	PN6 – Stockwell
S13 – Schools	PN7 – West Norwood
T1 – Sustainable travel	PN8 – Kennington / Oval
T2 – Walking	PN9 – Herne Hill
T3 – Cycling	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery policies D1 – D4

5C1.19 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. Overall, it is considered these policies should result in significant positive effects with regards to SA Objective

Housing policies H1, H3, H5, H6, H9, H11

5C1.20 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 or the reporting of more crime. 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. The Draft Revised Lambeth Local Plan October 2018 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.

5C1.21 The housing standards policy makes reference to safety and surveillance by stating that communal amenity space 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, particularly in housing estates or other communal spaces. Policy H6

on residential conversions seeks to maintain an appropriate stock of family accommodation while allowing for converted dwellings in certain circumstances and also seeks to promote a safer environment by limiting on-street parking. For example in controlled parking zones no additional car parking permits will be issued to any occupiers of additional housing units created through conversions. Where there is no controlled parking zone and existing on-street parking is at 85% or more, any additional car parking needs to be off-street. However this may be difficult to enforce and not necessarily prevent additional on-street car-parking stress nor prevent additional vehicles movements in the local area (although for off-street parking, will in some way limit movements through the maximum standards on policy T7 parking).

The policy team may wish to revisit clause (vi) of policy H6 to more effectively minimise vehicle movements and thereby reduce risk of potential traffic accidents to pedestrians and cyclists. [SA RECOMMENDATION 1]

- 5C1.22 Policy H9 seeks to protect existing hostels and HMOs which can help the homeless with overnight accommodation, providing opportunity for a safer environment for these people while also reducing opportunities to commit crimes against these people. Similarly, fewer homeless people on the streets helps address fear of crime as well as crime itself and antisocial behaviour in local areas. The policy also recognises hostels and HMOs accommodating vulnerable groups (such as young offenders undergoing rehabilitation or half-way house accommodation for those returning to independent living) can, in some cases, result in anti-social behaviour when too many such uses are located in close proximity. The policy therefore seeks to avoid harmful over-concentration and new uses of this nature should generally be located at least 150m away from similar premises.
- 5C1.23 Policy H11 on estate regeneration goes some way to provide safe communities although it may be considered that this could be strengthened. Clause (f) of the policy makes reference to safety, but only where external amenity space standards of policy H5 are not met. **The policy team may wish to consider improving reference to safety on housing estates in clause (h) as follows: ...'improve safety and access for walking, cycling and public transport use to local amenities for residents;'** [SA RECOMMENDATION 2]. This proposed amendment would also help better achieve other SA objectives such as health and well-being, access and services, liveability and transport. It is recognised that all Q policies of the Draft Revised Lambeth Local Plan October 2018 will also apply to estate regeneration schemes, including policy Q3 safety, crime prevention and counter terrorism.
- Economic and town centre policies ED6 – ED11***
- 5C1.24 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 ED6 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. Town centre and places and neighbourhoods policies are likely to reduce and prevent crime and fear of crime by keeping people occupied and with a sense of purpose and allowing for residential use on appropriate sites and above ground floor units. Proposals for nightclubs in railway arches outside of town centres will not be supported. This will help achieve SA objective 1, as well as have positive effects for other SA objectives such as housing and liveability.
- 5C1.25 Evening 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 and/or antisocial behaviour. Policy ED8

seeks to avoid unacceptable harm to community safety and amenity of neighbouring residential areas and sensitive uses caused by evening and food and drink uses and thus positively contributes to SA Objective 1.

5C1.26 In addition to evening economy uses some town centre uses such as betting shops can also exacerbate crime, fear of crime and/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 in improving the environment to address fear of crime and antisocial behaviour.

Social Infrastructure policies S1, S2, S3

5C1.27 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 social infrastructure which includes for example health care, youth centres. 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 in contrast promote more social cohesion and improve positive mental wellbeing. Proposals for schools will need to include travel plans and take into account road danger reduction measures and this seeks to achieve targets set out in sustainability framework (Table 4) regarding reducing traffic accidents.

Transport policies T1 – T7, T9

5C1.28 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 cars 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. Policies T1, T2 (walking) and T3 (cycling) also make specific mention of reducing road danger concerns which positively contribute to SA objective 1 (although it is considered **policy T3(b) makes bold claims that are perhaps unrealistic ‘Lambeth will ensure that people who want to cycle are able to do so and are not discouraged by road danger concerns’**). Given that Lambeth suffers from a high number of traffic collisions resulting in fatalities and serious injuries and the significant funding gap to address road danger reduction (IDP 2018); the policy team may wish to soften this wording to make it more achievable within the planning policy remit and development proposals. [\[SA RECOMMENDATION 3\]](#)

5C1.29 Policy T5 river transport makes provision for new piers or improvements to existing piers for transport or leisure uses and the Thames riverside walk. Clause (d)(ii) makes reference that the riverside walk incorporates provision for safe use by cyclists. It is considered that safety of pedestrians is equally important, particularly where pedestrians and cyclists are expected to share space. **It is recommended that clause (d)(ii) makes reference to pedestrians as well.** [\[SA RECOMMENDATION 4\]](#)

5C1.30 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 are well lit and monitored by CCTV where possible (policy T7). **It is recognised that policy Q3 will apply to car parking areas, however, given other policies explicitly mention natural surveillance and/or security measures (eg policy H5(c), policy T3 (c)), it seems reasonable to also include a reference to safety and security in policy**

T7 [SA RECOMMENDATION 5]. Clarification is also sought on the interpretation of the word ‘permeable’ in the context of outdoor and open parking areas. Is it permeable in the sense of water penetration, or permeable in the sense of wayfinding/legibility (as it is used in policy H13 estate regeneration and supporting text of policy T3 cycling). **[SA RECOMMENDATION 6]**

5C1.31 While policy T9 on mini-cabs, taxis and private hire vehicles does not directly reduce the need for motorised travel; it contributes to reducing 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 positively contributes to attaining SA Objective 1.

Open Space

5C1.32 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. The policy also states that green corridors are created for safe pedestrian and cyclist access.

Quality of Built Environment policies Q3, Q6, Q7, Q12, Q13, Q15, Q16

5C1.33 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, anti-social behaviour and fear of crime, and addressing terrorism in terms of design and resilience.

5C1.34 Policies Q6 and Q7 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 significant positive effects. **To further improve and reinforce importance of safety for pedestrians and cyclists, policy Q7 clause (viii) could be amended to include the word ‘safe’ as follows: ‘any vehicular access, parking (particularly in undercrofts or basements) or servicing is designed so as to be safe and well-related to the adjacent area, not prejudice or preclude active frontages, minimise impact on amenity and be visually attractive’ [SA RECOMMENDATION 7]. Clause (viii) should apply both within the site and outside the site in the adjacent area. This may need clarifying in the policy. Accordingly a further amendment to improve the clause would be: ‘any vehicular access, parking (particularly in undercrofts or basements) or servicing is designed so as to be safe and well-related to the users of the site and wider adjacent area, not prejudice or preclude active frontages, minimise impact on amenity and be visually attractive’ [SA RECOMMENDATION 8].** Design to ensure safe vehicular access, parking and servicing differs depending on the use and users of the site, for example schools, nurseries, hospitals compared to storage, waste or commercial uses.

It is noted that passive surveillance is difficult in under-crofts and as such, should be discouraged where possible.

5C1.35 Policy Q13 on cycle storage states that cycle storage should be secure and safe to use which will result in positive effects on SA Objective 1.

5C1.36 It is considered that policies Q15 and Q16 will result in positive effects on SA Objective 1, in particular, a reduced fear of crime. Policy Q15 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

(policy Q16), helping to reduce fear of crime. 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.

Places and neighbourhoods policies PN1 – PN11

5C1.37 In combination with other Draft Revised Lambeth Local Plan October 2018 policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN11) 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 enhance local character. No more betting shops will be supported in the primary shopping area or areas of protected retail frontage in Waterloo, anywhere in Brixton, Streatham or West Norwood town centres. The policies include improvements to public realm and transport infrastructure. **It is however noted that section 11 of the Draft Revised Lambeth Local Plan October 2018 does not acknowledge crime or fear of crime in any of the places and neighbourhoods policies or supporting text. There is only one reference in the supporting text to anti-social behaviour in relation to night-time activity in Clapham. The policy team may wish to revisit this to provide a better reflection of the current baseline conditions of crime for the borough's town centres [SA RECOMMENDATION 9].**

5C1.38 Clapham policy clause (g) could be strengthened regarding Cycle Superhighway 7. The policy seeks to improve the quality of the superhighway, yet the supporting text recognises the 'very poor safety record' of Clapham High Street. **It is recommended that the last part of clause (g) is amended as follows: '...and to improve the safety and quality of Cycle Superhighway 7.'** Similarly clause (e) could be amended to better reflect the poor safety record of Clapham town centre as follows: 'supporting enhancements to the public realm of the town centre to improve the safety and environment for pedestrians and cyclists;...' [SA RECOMMENDATION 10]

5C1.39 Policy PN10 Loughborough Junction, clause (b) could also promote safe walking and cycling routes through Loughborough Junction, particularly as the policy seeks to do this by opening up railway arches, bridges and along viaducts for access – areas that can be susceptible to crime, fear of crime or antisocial behaviour. Therefore **it is recommended clause (b) includes the word 'safe' as follows: 'support proposals that increase the safe permeability and navigability of the area and/or proposals that improve and facilitate safe walking and cycling routes...'.** It is considered these amendments better link to and support clause (f) of the policy. Clause (e) could also benefit from use of the word 'safe'. The number of routes through the area for people walking and cycling should not necessarily be maximised – it is the number of safe routes that should be maximised. Accordingly it is recommended that clause (e) is amended as follows: '...and the number of safe routes through the area...' [SA RECOMMENDATION 11]

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C1.40 Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that the Draft Revised Lambeth Local Plan October 2018 policies will have a significant positive effect on existing baseline conditions related to safe communities with reduced crime and disorder.

Table 9: Assessment of effects of Draft Revised Lambeth Local Plan on Crime objective

Assessment of effects of 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	+	++	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 Draft Revised Lambeth Local Plan October 2018 (with SA recommendations incorporated) will have significant positive effects on the crime objective. 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, controlled number of betting shops, mixed use developments, provision of improved safety for cyclists and pedestrians including improved safer routes and recognition of sufficient social infrastructure to accommodate the projected growth of population.	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 ad improved safer environments for pedestrians and cyclists 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 and occupied.	Permanent

Recommendations for monitoring likely significant effects

5C1.41 It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Percentage of proposals directly incorporating 'Secured by Design' or 'Designing Out Crime' 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 GOOD HEALTH AND REDUCED HEALTH INEQUALITIES

5C2.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

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

5C2.2 Health inequalities are differences in health between people or groups of people that may be considered unfair (Public Health England 2017). 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.

5C2.3 To achieve objective 2, plan policies should protect health and wellbeing; reduce poverty including child poverty and the impact of income inequality; help reduce health inequalities; help improve mental, emotional and physical health, and well-being; encourage the development of healthy neighbourhoods; make walking and cycling more attractive relative to other alternatives; improve access to health care services; help people be healthier, for longer; help people to live an inclusive and active lifestyle; and promote a sense of well-being.

Relevant policy objectives

National Level

5C2.4 *National Planning Policy Framework 2018* 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, mitigating impacts such as noise from new development, ensuring safe and healthy living conditions, achieving well-designed places, and conserving and enhancing the natural and historic environments. Section 8 of the NPPF contains policy on promoting healthy and safe communities.

5C2.5 *Health profile for England 2017* is a report combining Public Health England data and knowledge on the health of the population in England in 2017. It explores the impact of risk factors on health outcomes such as life expectancy, health life expectancy, morbidity and mortality, and considers how England compares with other developed countries. It summarise health inequalities in outcomes and the impact of the social determinants of health.

5C2.6 The 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.

5C2.7 The 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

5C2.8 The policies in the draft London Plan 2018 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 and town centres are designed, constructed and managed in ways that improve health and reduce health inequalities. Of particular relevance for addressing health and health inequalities are Policy GG3 Creating a Healthy City, Policy T2 Healthy Streets, Policy S2 Health and Social Facilities. The draft London Plan states 'health and health inequalities are systematic, avoidable and unfair differences in mental or physical health between groups of people. These differences affect how long people live in good health and are mostly a result of differences in people's homes, education and childhood experiences, their environments, their jobs and employment prospects, their access to good public services and their habits'. The draft plan recognises the wider determinants of health as 'a diverse range of social, economic and environmental factors which impact on people's health and life expectancy. They include transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks'. Accordingly policies on these factors seeks to improve health and reduce health inequalities.

5C2.9 Draft *Mayor's Health Inequalities Strategy 2017* describes some of the main issues which lead to inequalities in the health of different groups of Londoners, and proposes a set of aims for reducing them. There are five aims: healthy children, healthy minds, healthy places, healthy communities and healthy habits.

5C2.10 *Better Health for London 2014* sets out ten ambitions to improve the health of Londoners and reduce health inequalities – it targets the threats posed by tobacco, alcohol, obesity, lack of exercise and pollution.

Local Level

5C2.11 *Lambeth Cooperative Health and Well-being Strategy 2013-23* is a statement about what health and well-being means and how it impacts on individuals and families in Lambeth. It is a commitment to working together in a new, co-operative way to understand and address issues, and deliver tangible improvements for individuals and families, especially those with the greatest needs.

5C2.12 *The health of children and young people in Lambeth: annual report of the director of public health 2016/17* provides a high level summary of the health and well-being of children and young people in Lambeth. Public health recommends adopting a Health and Well-being in All Policies approach, as it is a practical framework for maximising the health benefits of all local plans and investment. The report advocates the use of a 'life course approach' to analyse and identify key areas of need, and then to develop mitigating actions to maximise positive developments and mitigate negative effects.

Baseline conditions and existing issues

5C2.12 Health issues in Lambeth reflect its position as an inner-city urban area with a young population profile and a mix of deprivation and affluence. Lambeth fares comparatively worse for health inequalities when compared to national rates. The burden of ill-health results from lifestyle issues as well as resulting diseases and/or long-term conditions such as heart disease and cancer. Life expectancy in Lambeth is improving and the life expectancy for women is slightly above the national average at 83 years, but male life expectancy is around a year lower than the national average at 78.5 years. Both male and female life expectancy is lower than national averages. (Lambeth Health Profile 2017) However, in some of the most deprived wards in Lambeth, life expectancy is 5.6 and 3.8 lower for men and women respectively when compared with the borough's least deprived areas (Lambeth Health Profile 2017). This reflects the significant adverse effect of poverty and deprivation on health. The gap in life expectancy is due to an excess of death from

chronic obstructive airways disease, cancer (especially lung cancer), circulatory disease, infectious disease, coronary heart disease and stroke in the more deprived parts of the borough (SOB report 2016).

5C2.13 Life expectancy at birth, at ward level varies between 77.4 years (Clapham Town) and 84.8 years (Thornton). Most wards have a life expectancy similar to Lambeth with the exceptions highlighted in Figure 4 below.

Figure 4: Life expectancy at ward level

Life Expectancy	Compared to Lambeth	Compared to London	Compared to England
Lower	Brixton Hill, Knights Hill, Larkhall, Clapham Town	Gipsy Hill, Oval, Streatham Wells, Streatham Hill, Brixton Hill, Knights Hill, Larkhall, Clapham Town	Streatham Wells, Streatham Hill, Brixton Hill, Knights Hill, Larkhall, Clapham Town
Higher	Thornton, Streatham South, St Leonards, Thurlow Park	Thornton	Thornton, Streatham South

(SOB 2016)

5C2.14 Conditions that contribute to Lambeth's lower (when compared against England) life expectancy include circulatory diseases such as coronary heart disease and stroke; cancer, especially lung cancer; respiratory diseases such as chronic obstructive pulmonary disease; digestive diseases such as cirrhosis of the liver; external causes such as suicide and violence; infectious and parasitic diseases, and mental health and behavioural disorders (SOB report 2016).

5C2.15 Coronary heart disease, hypertension, diabetes, chronic obstructive pulmonary disease, cancer and severe mental illnesses are the major long-term conditions having an impact on the health of the population in Lambeth. The top three causes of death amongst Lambeth residents are coronary heart disease, cancer and respiratory diseases (JSNA 2012). Lambeth has one of the highest incidences of mental health need in London as estimated by the Mental Illness Needs Index.

5C2.16 Unhealthy lifestyles such as smoking, alcohol and drug misuse are high compared to London and England, increasing the risk of serious illness. Approximately 20 per cent of the population in Lambeth is reported to be high-risk drinkers, similar to the national figure. Levels of teenage conceptions and sexually transmitted infections are also high. Obesity is a growing problem among children and young people in the borough (JSNA 2012).

5C2.17 Over 85% of people in Lambeth say they are in good or very good health. There are around 14,000 people who are in bad or very bad health, just under 5% of the population. This pattern is typical of London boroughs. Approximately one in four Lambeth households has someone with a long-term health problem or disability, which is similar to London. About 6% of Lambeth residents have their day-to-day activities limited a lot by a long-term health problem or disability (18,600 people), and another 6.6% (20,000 people) are limited a little. Around 20,500 people provide unpaid care to someone else, just under 7%. This is one of the lowest rates of provision of unpaid care in London (SOB 2016).

5C2.18 The 'Better Health for London' programme sets out ten ambitions to improve the health of Londoners and reduce health inequalities – it targets the threats posed by tobacco, alcohol, obesity, lack of exercise and pollution. On these outcomes Lambeth has a mixed public health picture, being amongst the worst boroughs in London on several indicators (see figure 5 below).

Figure 5 Better Health for London outcomes

Better Health for London key outcomes	Lambeth	Lambeth Rank / 33 London boroughs (Rank 1 worse / higher outcome)	London	Comparison with London
School Readiness: The percentage of children achieving a good level of development at the end of reception (2013/14)	55.8%	4 th	62.2%	Worse
Excess weight in 10-11 year olds (2014/15)	41.8%	3 rd	37.2%	Worse
Percentage of physically inactive adults (2014)	20.3%	30 th	27.0%	Better
Excess weight in adults (2012-14)	49.6%	30 th	58.4%	Better
The percentage of working days lost to sickness absence (2010/12)	0.9%	29 th	1.3%	Similar
Smoking prevalence (2014)	18.1%	13 th	17.0%	Similar
Admission episodes for alcohol related conditions / 100,000 (2013/14)	625.9	5 th	541.2	Worse
% of people on register with severe mental illness known to GPs (2013/14)	1.26%	9 th	1.05%	Higher
Proportion of people who are feeling supported to manage their condition (2014/15)	59.4%	14 th	59.7%	Similar
Mortality rate from causes considered preventable / 100,000 (2012/14)	205	5 th	169.5	Worse than London

5C2.19 There are a growing number of people with learning disabilities living in the borough. The proportions of people with mental health problems and with physical disabilities and older people helped to live at home are increasing. One-third of those aged 65+ is estimated to live alone. 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.

5C2.20 Lambeth has a relatively high birth rate in comparison to national averages, but has a lower rate than other inner London authorities and the rate has been reducing over the past four years after years of growth since 2001 (ONS, 2017). The infant mortality rate (death in babies under 1 year) has decreased steadily in Lambeth and is currently 4.1 deaths per 1,000 live births, which is broadly in line with the London and national averages.

5C2.21 The Lambeth Clinical Commissioning Group (CCG), a group of 44 GP practices in the borough, work with the council and pharmacies, dentists, hospitals and mental health providers, to commission NHS services for residents. The Lambeth Public Health Directorate now sits within the council. *Lambeth Healthcare Infrastructure Analysis* undertaken by the London Healthy Urban Development Unit in July 2018 for

the Lambeth CCG, sets out the future need for GP space by each CLIP area and CCG Locality in Lambeth. It identifies a shortfall of 16 GP clinical rooms by 2028 across the borough, with a shortfall identified in the north of the borough and in Streatham.

Likely future evolution without the Draft Revised Lambeth Local Plan October 2018

- 5C2.22 National policies will not work without effective local delivery systems focused on health equity in all policies. In terms of planning, if there was no up-to-date Local Plan document for Lambeth, reliance would fall on policies within the London Plan and NPPF.
- 5C2.23 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 Draft Revised Lambeth Local Plan October 2018. However, planning has an important role to play by ensuring that development does not exacerbate health inequalities, but results in an improved inclusive environment for everyone. Health inequalities will continue to exist without local intervention and the improvement of people's quality of life (for example warmer homes and more efficient to heat reducing fuel poverty, access to local jobs, encouraging walking and cycling, limiting hot food takeaways near schools, improving local air quality, planning for health infrastructure and improved access to open space, green infrastructure and nature).

Assessment of draft revised Policies

- 5C2.24 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 2, Health. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the draft revised Plan.
- 5C2.25 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 Draft Revised Lambeth Local Plan October 2018 may impact on the attainment of improving conditions and services that facilitate good health and reduce health inequalities. The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	T3 – Cycling
D2 – Presumption in favour of sustainable development	T4 – Public transport infrastructure
D3 – Infrastructure	T5 – River transport
D4 – Planning obligations	T6 – Parking
H1 – Maximising housing delivery	T9 – Digital connectivity
H2 – Delivering affordable housing	EN1 – Open Space
H3 – Safeguarding existing housing	EN2 – Local food growing and production
H4 – Housing mix in new developments	EN3 – Low carbon and energy
H5 – Housing standards	EN4 – Sustainable design and construction
H6 – House conversions	EN5 - Flood risk
H8 – Housing to meet specific community needs	EN7 – Sustainable waste management
H9 – Hostels and houses in multiple occupation	Q1 – Inclusive environments
H10 – Gypsy and Traveller needs	Q2 – Amenities
H11 – Estate regeneration	Q3 – Safety/crime prevention
H12 – Build to rent	Q9 – Landscaping
H13 – Shared living	Q10 – Trees
ED1 – Offices (B1a)	Q12 – Refuse/recycling storage
ED2 – Affordable workspace	Q13 – Cycle storage
ED3 - KIBAs	Q14 – Development in gardens
ED4 – Non-designated industrial sites	Q24 – River Thames
ED5 – Work-live development	Q25 – Views
ED7 – Town centres	Q27 - Basements
ED8 – Evening economy and food and drink uses	PN1 – Waterloo
ED9 – Public Houses	PN2 – Vauxhall
ED10 – A2 uses	PN3 – Brixton
ED11 – Local centres	PN4 – Streatham
ED12 – Markets	PN5 – Clapham
ED15 – Employment and training	PN6 – Stockwell
S11 – Safeguarding existing social infrastructure	PN7 – West Norwood
S12 – New or improved social infrastructure	PN8 – Kennington / Oval
T1 – Sustainable travel	PN9 - Herne Hill
T2 – Walking	PN10 Loughborough Junction
	PN11 Upper Norwood

Delivery and monitoring policies D1 – D4

5C2.26 Policies D1- D4 will contribute towards the attainment of SA Objective 2 through working with a range of partners (including Lambeth and Southwark Public Health Directorate), delivering regeneration defined in Opportunity Area Planning Frameworks and local area 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 for 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 – H13

5C2.27 Following assessment of policies; it is considered that overall the Draft Revised Lambeth Local Plan October 2018 housing policies (coupled with other relevant policies such as quality of built environment and environment policies) will generally have 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 for some residents of the borough, particularly more vulnerable groups. Residential stability reduces the stress and disruptions associated with frequent or unwanted moves. The housing size 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. Where leisure facilities (particularly swimming pools, gyms and other indoor and outdoor sports facilities) are provided in student accommodation developments, policy H7 states these should be made available to the public in locations where there is an identified shortage of provision. This will help improve physical health, help people be healthier for longer and live an inclusive and active lifestyle.

- 5C2.28 Policy H5 also provides for external amenity space. Houses, ground floor flats and family sized units should preferably have direct access to a private garden which provides positive effects in terms of SA Objective 2. Clause (c) of the policy provides a list of criteria for the design of communal amenity spaces. It is considered that this list of criteria could be improved to actively encourage and entice actual use of communal amenity space by residents, rather than the space being provided to 'tick the box'. Provision of a grassed area with perhaps a couple of shrubs, but otherwise void of any other amenities arguably meets the criteria. However providing seating and other types of outdoor furniture/amenities together with strategically thought out landscaping to attract people to use these spaces would work to improve mental, emotional and physical health and well-being, particularly in areas of open space deficiency. As far as possible, communal amenity areas should enable experiences. The Green Infrastructure Strategy identifies four broad types of experience:
- Active spaces providing a focus for recreation and the community
 - Tranquil contemplative spaces
 - Wild spaces to connect with nature
 - Designed / cultural spaces providing a sense of place and history.

It is considered that policy H5 (c) on communal amenity areas could be improved to increase and encourage the actual use of such spaces. This becomes increasingly important with population growth and lack of land to create new public green open spaces, particularly in areas already identified as being deficient in access to open space. It is recognised that London Plan policy G5 on the urban greening factor will apply to all major developments, but in addition to this measures to improve usability of such spaces would be welcomed. **It is recommended that the policy team revisit this aspect of the policy [SA RECOMMENDATION 12]**

- 5C2.29 ***Economic development policies ED1 – ED5, ED7 – ED11, ED12, ED15***
One of the biggest influences on people's health is employment. The Draft Revised Lambeth Local Plan October 2018 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 health inequality. Employment has a strong bearing and effect on mental health. The provision of a range of employment opportunities helps ensure people have access to suitable employment and are likely to remain healthier by having steady income. Economic development policies (ED1 – ED4 in particular) seek to safeguard existing business use / employment generating land, and this will likely result in positive effects on mental health and well-being of local residents as it helps to improve access to local jobs for local people. Improved vitality and viability of town centres (policy ED7) should also result in positive effects on mental health and wellbeing, through employment opportunities, access to services and facilities, and sense of place. New residential development on appropriate sites in town centres further maximises positive effects for health through for example access to jobs, services and facilities, access to healthy food, reduced need for travel. Controlling the number of betting

shops, pay-day loan shops also provides benefits for improved health by avoiding negative impacts on vitality and viability of town centres and the secondary effects on health and enjoyment of place this may create. 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.

- 5C2.30 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 (evening economy and food and drink uses) protects amenity of residential areas and sensitive uses, and impacts on community safety from adverse impacts arising from evening economy (e.g. noise and nuisance). It limits these uses to town centres and the Central Activities Zone frontage. The policy also states that proposals for hot food takeaways (A5 uses) will not be supported if proposed within 400m of the boundary of a primary or secondary school. Proposals for drive-through takeaways are not supported in any location of the borough. This should have positive effects in terms of tackling obesity, in so far as how planning can achieve this goal. For example, it does not address other fast food eating establishments that can contribute to obesity but do not fall within A5 use class (such as A3 uses like McDonalds or KFC restaurant; or sale of fast food donuts, ice cream or other unhealthy food (A1)); but it is accepted that using the term “fast food” in the Local Plan would be open to interpretation – and the council could not (and would not wish to) control the sale of particular food items (e.g. donuts and ice-creams) from A1 or A3 premises. In accordance with London Plan policy E9 proposals for A5 uses will be conditioned to require the operator to achieve and operate in compliance with the Healthier Catering Commitment standard.
- 5C2.31 Protection of public houses (policy ED9) can contribute to positive health through their role in social interaction, local community life, sense of place and provision of local employment. In so far as planning policy can influence; it is considered that these benefits outweigh any negative effects to resident’s health that may arise through alcoholism and binge drinking. These negative effects can also arise through sale of alcohol from A1 retail units, of which specific consumer goods are not within the control of planning policy.
- 5C2.32 Policy ED12 on markets provides opportunity for sale of fresh fruit and vegetables and likely increases the accessibility to affordable nutritious and varied foods.
- Social infrastructure policies S1 and S2**
- 5C2.33 Significant positive effects are likely to result from policies S1 (Safeguarding existing social infrastructure) and S2 (New or improved social infrastructure). 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, easily reached by foot, cycling or public transport and fully accessible to all sections of the community (including disabled and older people) thereby helping to reduce health inequalities. Ideally, social infrastructure should be located where there is an identified need that helps reduce health inequalities 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 under-used facilities. However it is accepted that this ultimately rests with infrastructure providers, and there are identified projects in the Infrastructure Schedule.

5C2.34 It is considered that policy S2 fully seeks to reasonably maximise accessibility to new sports and leisure facilities (D2 uses). This supports improved physical and mental health of local people by confirming such facilities provided in hotels, student housing and shared-living developments should be made available for public access during off-peak hours to groups of Lambeth residents and users identified by the council. **For more equitable outcomes across all groups of people, it is recommended that leisure facilities are made available for general public use, rather than just those groups identified by the council [SA RECOMMENDATION 13].** This will also result in significant positive effects for other sustainability objectives, for example equalities, access and services, liveability). Draft Revised Lambeth Local Plan October 2018 policies H13 shared living and ED14 hotels do not make reference to this shared use of leisure facilities, however policy H7 student accommodation does. **It is recommended that for improved transparency and intended and easy implementation of local plan policies, reference is included on the shared use of leisure facilities where these are proposed, in the shared living and hotel/visitor accommodation policies (H13 and ED14) [SA RECOMMENDATION 14].**

Transport and communications policies T1 – T6 and T9

5C2.35 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, support the Mayors Healthy Streets Approach, prioritise walking and cycling, and seek to 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. Equally however, it is recognised that increased population growth is expected over the plan period, and if there is an associated increase in number of vehicles in the borough, effects on air quality may not necessarily be favourable (it is recognised electric vehicles are encouraged). Policy T2 on walking seeks to ensure the physical environment in Lambeth, including all streets, is fully accessible to all. Policy states that provision for pedestrians should be inclusive and prioritise those with particular mobility needs. This helps to reduce health inequalities, make walking more attractive and help people live an inclusive and active lifestyle.

5C2.36 The intentions of policy T3 cycling are welcomed but perhaps arguably a bit too ambitious/unrealistic. Clause (a) states ‘Lambeth will ensure that people who want to cycle are able to do so and are not discouraged by road danger concerns’. This is a big claim, and not considered something any organisation can ‘ensure’. Until a critical mass of cyclists is achieved, together with appropriate cycle lanes and other safety measures, there will be potential for accidents – behaviour of all road users, especially private and commercial vehicles must improve. It is noted that supporting text says ‘Lambeth’s Transport Strategy aims to ensure that anyone who wants to cycle is able to do so easily...’. **It is recommended that the policy wording is softened to be more achievable (see SA recommendation 3 for possible wording) [SA RECOMMENDATION 15].**

5C2.37 **It is noted that both the walking and cycling policies both state that ‘greater priority’ will be given to each pedestrians and cyclists ‘in the use of road space’. It is unclear whether this means greater priority than what is currently**

provided, of whether pedestrians are given greater priority in the use of road space over other transport modes (and the same for cyclists), and whether either of the policies refers back to the transport hierarchy set out in policy T1. The policy team may wish to revisit this wording [SA RECOMMENDATION 16].

- 5C2.38 Supporting paragraphs 1.9 and 1.13 states that walking and cycling are healthy forms of transport. In itself, this is true, and each does contribute to a degree of improved health through a more active lifestyle. However, walking and cycling in Lambeth is not always healthy. In some areas of the borough, pedestrians and cyclists are subject to very high levels of air pollution with significant adverse effects on health, particularly for more vulnerable groups of the community. It is considered that this air quality impact on health should be recognised in policy and supporting text and considered in development proposals. It is noted that all references to air quality in the transport section of the draft revised plan have been removed (that are included in the Lambeth Local Plan 2015). It is also noted that London Plan policy SI1 Improving air quality applies. However **given the current regional and local prominence of air quality issues, any further references to improving air quality in the Local Plan with regards to transport would be welcomed. Policy T2(a) could include the word 'healthier'. For example '...and make walking a safer, healthier, quicker more direct attractive form of travel'. Policy T3 could make the same amendment in clause (b) and also add 'air quality' as follows: 'Lambeth will improve conditions for people to cycle and make cycling a safer, healthier, quicker and more direct attractive form of travel. Lambeth will aim to (or help) enable people who want to cycle to do so and not be discouraged by road danger or air quality concerns' [SA RECOMMENDATION 17].** These modifications will also help support more effective achievement of SA objectives 7 (liveability) and 15 (air quality) and align better with Draft Revised Lambeth Local Plan October 2018 policy EN1(d)(iii).
- 5C2.39 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. Policy also provides that 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.
- 5C2.40 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.
- 5C2.41 A reduction in car ownership and private car trips is promoted in policy T7 parking. The maximum residential car parking standards set out in London Plan policy 6.1 will apply, except for areas of PTAL 1 and 2 where Lambeth will apply fewer spaces per unit than the London Plan. Essentially for Lambeth this means the CAZ, Waterloo and Vauxhall opportunity areas, Brixton and Streatham town centres and all areas of PTAL 4-6 will be car-free. PTAL 2 and 3 areas are permitted to have up to 0.25 spaces per unit and PTAL 1 areas may have up to 0.5 spaces per unit. These limits to car-parking should improve residential amenity and contribute to healthier lifestyles through improved air quality and promotion of walking and cycling (although it may be problematic for people who need a vehicle for their employment).
- 5C2.42 Health considerations have been included in policy T9 on telecommunications as there will need to be compliance with the International Commission on Non-Ionising

Radiation Protection guidelines. Support for high quality digital infrastructure helps enable working from home and provided broadband connection fees and access are affordable, it helps reduce poverty, including child poverty and the impact of income inequality. Making digital infrastructure as commonplace to all households as water, sewerage, electric and gas infrastructure is good starting point at reducing inequalities affecting children and their future employment prospects.

Environment and open space policies EN1 – EN5 and EN7

5C2.43 Policy EN1 will result in positive effects on SA Objective 2 as it seeks to protect open spaces and green infrastructure 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 and provision of green infrastructure will also encourage increased use of spaces, making them feel safer and be healthier and attractive places. Application of the urban greening factor in developments will help provide significant positive effects on health and well-being for users and occupiers of the site, and for those adjacent to the site. The ability to even just see green infrastructure contributes to a sense of well-being and has beneficial impacts on health and environmental amenity.

5C2.44 With regards to sustainability appraisal considerations, loss of existing ground floor public open space with replacement at roof level is not considered to be of equivalent quality, regardless of access arrangements. Loss of green and open space at street level will have adverse effects on health and well-being, giving rise to feelings of urban claustrophobia and the cumulative effect over time would result in significant negative effects. Open space at street level provides feelings of openness in otherwise urban concrete environments and more effectively relieves adverse urban heat island effects, by providing cooler air at ground level. Open space at ground level is much more likely to be visually enjoyed by more people than open space at roof level. Open space is also more likely to be used by more people at ground level than at roof level, due to a more perceived ease of accessibility (even if roof is fully accessible to the public) and does not discriminate against those with a fear of heights. It is considered that open space at roof level could be perceived as less child-friendly. Once open space is lost to development, it is highly unlikely it will ever revert back to open space. **Negative effects on other sustainability objectives would likely arise from the Draft Revised Lambeth Local Plan October 2018 EN1 interpretation of equivalent quality of open space provision (for example liveability, biodiversity and air quality). It is recommended that the policy team reconsider the implications, particularly cumulatively and synergistically, on this policy position [SA RECOMMENDATION 18].**

5C2.45 A lack of access to affordable and nutritious food is a contributor to poor health. Policy EN2 enables access to healthy food through encouraging new allotments, orchards and local food growing spaces and production

5C2.46 Overall it is considered that Policy EN3 on decentralised will result in positive health effects as it seeks to provide warm and healthy homes and developments.

5C2.47 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 all development to meet high 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). New build residential development is encouraged to use the Home Quality Mark and Passivhaus design standards which seek to positively impact the occupants health and well-being, reduce the home's environmental footprint and improve resilience to flooding and overheating. Non-residential developments should meet at least BREEAM excellent standard. Contaminated land requires adequate remedial treatment before development can commence which positively protects health of future occupiers / users of land.

5C2.48 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.

5C2.49 **Quality and Built Environment policies Q1 – Q3, Q9, Q10, Q12 - Q14, Q24, Q25**
Overall it is considered that the design policies will result in significant positive effects on the health of the borough, particularly as these seek to provide inclusive environment, 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.

5C2.50 Planting of new trees and increased green infrastructure through policies Q9 and Q10 help reduce the heat island effect and will cool ambient air temperatures. Additionally, green infrastructure helps improve air quality by filtering particulates (notably PM₁₀). This is likely to help those with respiratory conditions. Furthermore, it is recognised that contact with trees and vegetation can help alleviate stress, which will be beneficial for people's health.

5C2.51 Policy Q12 on refuse and recycling storage makes reference to public health, recognising the potential adverse impacts on health waste can have.

5C2.52 Policy Q13 seeks to ensure that cycle storage areas are incorporated into developments and made prominent, accessible, attractive, secure and safe to use to help increase cycling levels and improve outcomes with regards to SA Objective 2.

5C2.53 Policy Q14 resists proposals for development in gardens, or land most recently used as gardens, which would result in the loss of biodiversity, loss of trees of value, poor drainage, or cause unacceptable amenity impacts. **Clarification is needed on what trees are considered 'of value'** [SA RECOMMENDATION 19]. All trees may be considered to be of value with regards to improving health and well-being, including for adjacent owners and occupiers.

5C2.54 It is considered that policies Q24, Q25 and Q27 appropriately benefit health outcomes where possible.

Places and Neighbourhoods Policies PN1 – PN11

5C2.55 In combination with other Draft Revised Lambeth Local Plan October 2018 policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN11) should result in significant positive effects in relation to SA Objective 2. In particular policy PN1 on Waterloo will result in significant positive effects with support for development strategies associated with St Thomas' Hospital and the Guy's and St Thomas' Trust and Kings College London to achieve new health facilities.

5C2.56 The whole borough is designated an air quality management area, yet the improvement of air quality (a determinant of health) is only mentioned in the

Waterloo, Vauxhall, Streatham, Stockwell and Kennington policies. Air quality is mentioned in the short summary of characteristics and challenges for Brixton, but not within the actual policy, despite part of Brixton being within an air quality focus area. Air quality is not mentioned at all in either the short summaries or policies for Clapham, West Norwood, Herne Hill, Loughborough Junction or Upper Norwood. Given the health benefits of improved air quality, and taking into account the whole borough is an air quality management area and air quality does not respect spatial boundaries; **it is recommended that the policy team revisit the places and neighbourhood policies, particularly Brixton, Clapham, West Norwood, Herne Hill, Loughborough Junction and Upper Norwood, to ensure improvement of air quality is more appropriately recognised [SA RECOMMENDATION 20]**. This will also help achieve SA objective 15 on improving air quality.

5C2.57 Similarly, not all places and neighbourhoods policies seek a reduction in traffic or improved traffic and environmental conditions for pedestrians and cyclists. The desire to reduce traffic dominance in West Norwood is expressed in the short summary of characteristics and challenges, but there is no mention of this in policy PN7, nor is there any mention of improvement for pedestrians or cyclists. In Herne Hill policy PN9 and Loughborough Junction policy PN10 there is reference to pedestrians and cyclists but not traffic reduction. It is noted that Loughborough Junction has one of the lowest levels of car ownership in the country, and that most residents walk and cycle to get around the area – so traffic may not be a significant issue for this place. However, **the policy team may wish to revisit policies PN7 West Norwood and PN9 Herne Hill to ensure baseline conditions with regards to traffic dominance/congestion and levels of walking and cycling could be improved**. 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. **[SA RECOMMENDATION 21]**

5C2.58 The Clapham policy seeks to control the number of food and drink uses in the town centre which should result in more positive health impacts in terms of mental health and well-being for residents who are affected adversely by evening economy effects (such as anti-social behaviour, noise). The policy also does not permit any more hot food takeaways in the area which may have some positive impact on the physical health of local residents, although more positive impact is likely to come from increased feelings of sense and pride of place (from better control of evening uses).

5C2.59 Policies PN1, PN2, PN3, PN4 and PN7 promote mixed use developments and tall buildings. High rise residential tower blocks do not necessarily create neighbourliness and are not always 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.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C2.60 Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that the Draft Revised Lambeth Local Plan October 2018 will have a significant positive effect on the existing baseline and in

improving conditions and services that engender good health and reduce health inequalities, in so far as the planning regime allows.

Table 10: Summary assessment of effects of Draft Revised Lambeth Local Plan October 2018 on health objective

Assessment of effects of 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 Draft Revised Lambeth Local Plan October 2018 together with SA recommended changes, will likely have significant positive effects on the health objective and existing baseline conditions in particular increasing housing supply to help address homelessness and overcrowding, mixed housing sizes, affordability and accessibility. Recommended changes to the draft Plan to improve health effects in the borough include making communal amenity areas more attractive and useable for residents, amending policy ED14 hotels and H13 shared living to make reference to leisure facilities being available to general public where proposed as part of development, improving transport policies on walking and cycling to ensure routes are healthier by addressing current poor air quality, ensuring open space at ground level is protected and any replacement open space is provided at ground level, and that air quality is appropriately addressed in all places and neighbourhoods policies taking into account the borough-wide area quality management area designation. It is considered that current wording of EN1 regarding replacement open space at roof level has potential for significant negative cumulative and synergistic effects over time.</p> <p>Increased population growth and construction over the plan period may result in increased vehicle movements and associated negative impacts on air quality. However, it is considered that policies seek to minimise private vehicle use, encourage sustainable travel modes (including river freight) and control dust and emissions. It is otherwise considered that the Draft Revised Lambeth Local Plan October 2018 policies 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 the sustainability framework (Table 4).</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 encouraging open space in areas of current open space deficiency, improving air quality and public transport improvements are likely to be seen in the medium to long term. To reflect in actual health of residents will likely be a long term measure.	Permanent

Recommendations for monitoring likely significant effects

5C2.61

It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Infrastructure Delivery Plan updates
- Amount of open space lost through completed planning permissions
- Housing supply: number of net additional dwellings completed
- Tenure of new affordable housing (completions and approvals)
- Modal Share – walking, cycling and public transport
- Number of cycle parking spaces provided in completed major developments
- Number of disabled parking spaces per completed major development
- Life expectancy

5C3 ACCESS AND SERVICES

5C3.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 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.

5C3.2 To achieve this objective, plan policies should improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel (including schools, nurseries, GPs and hospitals, libraries, places of worship, food shops, community centres, children's play areas, sports and recreation facilities, open spaces, police and emergency services, banking facilities and post offices); help older, disabled and vulnerable people live independently and have control over their lives; and help vulnerable children and adults get support and protection.

Relevant policy objectives

National Level

5C3.3 Accessibility is incorporated into a number of policies of the *National Plan Policy Framework 2018*. For example, paragraph 127 states the planning policies should ensure developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. Para 87 states when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well-connected to the town centre; and para 91 states planning policies should aim to achieve healthy, inclusive and safe places which are safe and accessible (in terms of crime), and in terms of health 'enable and support healthy lifestyles,...for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling'. Para 92 states planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; and ensure an integrated approach to considering the location of housing, economic and community facilities and services.

Regional Level

5C3.4 A number of different policy areas address accessibility in the *draft London Plan 2018*, for example related to strong inclusive communities, transport, housing, town centres. Policy GG1 building strong and inclusive communities seeks to provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation; SD6 town centres seeks to build strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development; that local and neighbourhood centres focus on convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis; policy D5 on accessible housing.

Local Level

5C3.5 The *Lambeth Borough Plan 2016 – 2021* sets out three priorities: creating inclusive growth, reducing inequality, and building strong and sustainable neighbourhoods.

The Plan contains a number of goals and ambitions to achieve these priorities that also help create an environment that is accessible to and fully inclusive for all people.

- 5C3.6 The *Lambeth Transport Plan 2011-2031 (Lambeth's second Local Implementation Plan)* 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.

Baseline conditions and existing issues

Age

- 5C3.7 Lambeth's age profile is heavily influenced by the borough's status as a destination for working age migrants from UK and abroad. Over half of the population is younger working aged (20-44 years), and there are relatively few children and young people under 20 - only Wandsworth, Hammersmith & Fulham, Camden, Islington, Kensington & Chelsea and Westminster have a smaller proportion of children. Lambeth has the highest number of people aged 25-29 of any London borough. Most immigrants are aged 20-24, and most out-migrants are aged 20-44. Many families leave the borough with small children. The borough has a small proportion of people aged 60+ (SOB 2016).

- 5C3.8 Table 11 below demonstrates that various ethnic groups in the borough have different age profiles.

Table 11: The various ethnic groups in the borough have different age profiles

Ethnic Category	Groups	0-19 years	20-44 years	45-59 years	60+ years
All ethnicities		22%	51%	17%	11%
White¹¹	Largest young working age population	13%	59%	16%	12%
BAME	More children and young people	32%	42%	17%	9%
Black Caribbean	Oldest age profile	24%	33%	25%	18%
Black African	High proportion of children and young people	34%	40%	19%	8%
Black Other	Highest proportion of children and young people	44%	40%	13%	4%

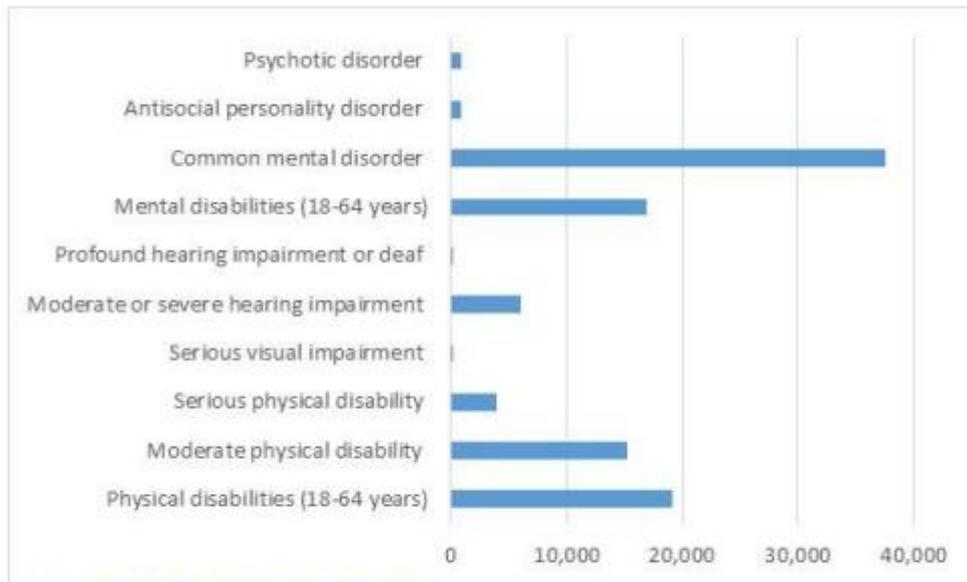
(SOB 2016)

Disability

- 5C3.9 There are many measures related to disability, each with a slightly different emphasis. For example, some focus on disability as a barrier to economic activity, rather than the extent to which day-to-day activities are limited, or the kind of care needed. About 37,000 people in Lambeth say their day-to-day activities are limited by a long-term illness or disability, about 17,000 limited a lot, and 20,000 limited a little. About 60% of people with a limiting health condition are aged over 50. About 12% of residents aged 50-64 have a limiting health condition, as do 27% of 64-74s, 46% of 75-84s and 64% of over 85s. 7% of adults classify themselves as having a long term limiting illness or infirmity, and 5% say they have a disability. Projections from by the Department of Health, projecting data from the Health Survey for England to a borough level suggests that there are 19,000 working age residents who have a

moderate or severe physical disability in the borough, and 37,600 who have a common mental disorder.

Figure 6: predicted numbers of disabled people (2015)

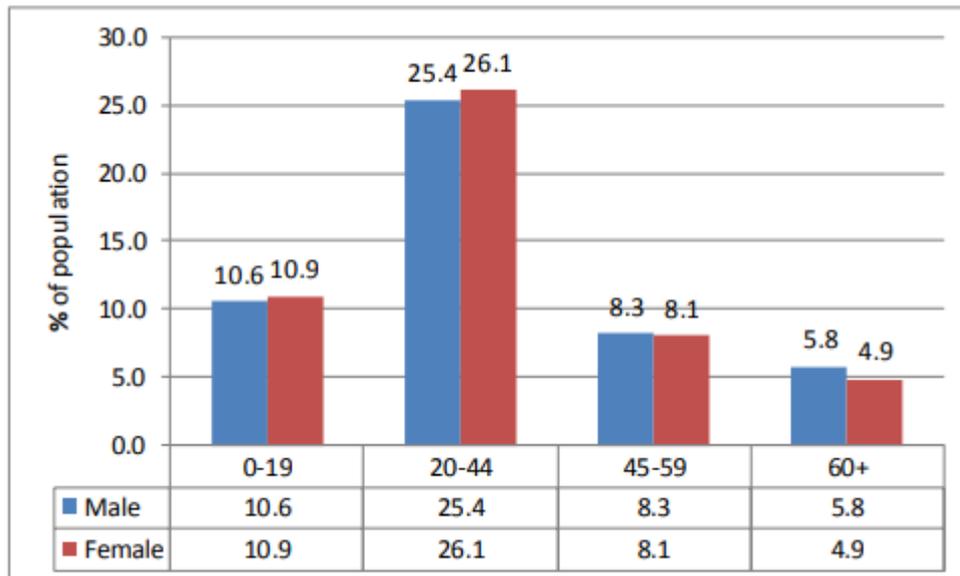


Source: [PANSI, Department of Health](#)

Gender

5C3.10 There are roughly equal numbers of male and female residents in Lambeth – around 157,000 of each. The age profiles are similar: Just under 22% of the population are under 20; 52% are young working age (20-44); 16% are older working age (45-59) and 11% are aged 60+ (SOB 2016).

Figure 7: Population by gender and age

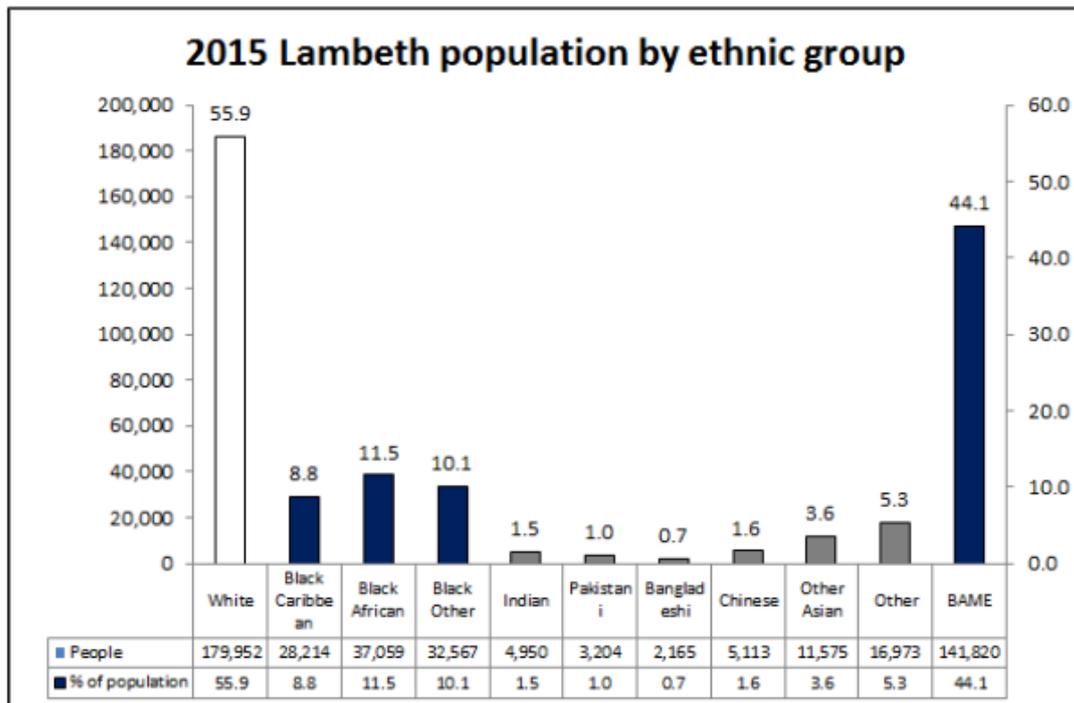


(SOB 2016)

Ethnicity

5C3.11 Around 40% of Lambeth’s population is white with a UK background. White people make up 55% of the population. Around 40% of Lambeth residents are White British or Irish, in line with inner London (43%). 15% of the population are from other white

backgrounds – around 47,000 people. About two thirds of these people are from Europe outside UK & Ireland. 8% are from Central and South America, 4% from North America and the Caribbean, and 8% from Australasia. Black people make up around a third of the population (30.4%). Lambeth’s largest non-white ethnic group is black African (11.5%), followed by black Caribbean (8.8%). Lambeth has the joint second highest proportion of black Caribbean people in London after Lewisham (10.7%) and Croydon (8.8%). Lambeth has a small Asian population compared to many places in London. Only 8.4% of Lambeth residents are from Asian backgrounds (including Chinese), much less than the inner London Average (21%) (SOB 2016).



Religion

5C3.12 Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents by religion, which have differing ethnic profiles. In broad terms, Lambeth’s Christian population is about 34% white British, 18% other white, 15% black African and 13% black Caribbean. The Muslim population is about 31% Asian, 33% black African and 10% other ethnic group. Over a quarter of residents have no religion. These are overwhelmingly white British (60%), white other (15%), and 9% of mixed ethnic groups. In recent years, the percentage of Christians has decreased by around 1.8 percentage points per year, whilst the percentage of people with no religion has increased by almost three percentage points per year. The percentage of Muslims, Buddhist, Jews, Hindus and Sikhs has remained largely the same (SOB 2016).

Transport

5C3.13 Public transport infrastructure in the borough is generally good for non-disabled people but less good for those with disabilities or access needs. There are 14 railway stations evenly spread throughout the borough and nine Underground stations, predominantly in the north. The extension of the Northern underground line extension to Battersea is under construction, which will see a new station opened at Nine Elms in 2020. Accessibility at Lambeth’s train stations is graded as poor at 8 of the 14

stations (Lambeth Transport Strategy 2018) and of the nine underground stations, only Brixton and Vauxhall are fully step free along with the Jubilee line at Waterloo.

- 5C3.14 Rail services in the borough are split across four franchises, the terms of which are set by the DfT; South Western, South Eastern, Southern & Thameslink. In addition TfL is responsible for London Overground and Underground services. Over the past 10 years growth in passenger numbers has been strong (Lambeth Transport Strategy Baseline Report 2017).
- 5C3.15 During peak periods rail services in Lambeth are currently at or over capacity, particularly services from Clapham Junction to Waterloo and Herne Hill to Victoria (Lambeth Transport Strategy Baseline Report 2017). Investment is needed to improve conditions for passengers, to provide full access to all stations and to enable the planned increases in resident and working population.
- 5C3.16 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. With bus routes 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.
- 5C3.17 The proportion of households with no car or van increased from 51 per cent in 2001 to 58 per cent in 2011 (Census data ONS). Traffic congestion is an issue that is prevalent in parts of the borough. Average bus speeds have suffered in recent years due to congestion and in some parts of the borough there are problems with 'rat running' where drivers cut through residential areas to avoid congestion on main roads (Lambeth Transport Strategy 2018).
- 5C3.18 Lambeth has a low live-and-work ratio: only 28 per cent live and work in the borough. Nineteen per cent of residents commute to Westminster and seven per cent commute to the City (Destinations 2020, Mayor of London August 2010). Commuting by different modes varies across different parts of the borough with between 55.3 and 66.9 per cent of community trips being made by public transport, which is higher than the national average (Transport Strategy Baseline Report 2017).
- 5C3.19 The borough also benefits from river transport, both for passengers and transporting freight. There are two Thames Clipper stations in the borough.
- Open Space*
- 5C3.20 The total area of open space in Lambeth is just less than 844 hectares, representing 31 per cent of the area of the borough. With population increases since 2001, the amount of unrestricted open space per head of population has been reducing and in 2011 stood at 1.48 hectares per 1000 people (Lambeth Green Infrastructure Strategy 2016).
- 5C3.21 In 2016, Greenspace Information for Greater London (GiGL) prepared maps of deficiency for three different types of open spaces (local, small and pocket parks; district parks and metropolitan parks) in the borough. This identified that around one third of the borough had sufficient access to the three types of open spaces but 2% of the borough was deficient in access to all categories of open spaces – in locations near King's College Hospital and Kennington.

5C3.22 There are over 60 parks and open spaces in Lambeth. Fourteen parks or open spaces were awarded the Green Flag in 2017 in recognition of high environmental quality and management and access to the community. These are Archbishop's Park, Brockwell Park, Kennington Park, Milkwood Community Park, Myatt's Fields Park, Ruskin Park, Streatham Rookery, St. Paul's Churchyard, Vauxhall Park, St John's Churchyard, Eardley Road Sidings Nature Reserve, Hillside Gardens Park, Palace Road Nature Garden and West Norwood Cemetery. West Norwood Cemetery is also 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.

Sports and Leisure

5C3.23 Sports and Leisure facilities are provided across the borough by both the Council and private operators. These include sports pitches and courts, swimming pools and an ice rink. Most of the outdoor facilities are located within the Council's parks and open spaces. Indoor provision is provided in the form of six leisure centres, which are managed by GLL on the Council's behalf (IDP 2018).

5C3.24 *The Strategic Assessment of Need for artificial grass provision in London 2017-2041* shows that a large portion of the demand for such pitches is met in neighbouring authorities and that the borough has one of the highest levels of unmet demand, which is likely to increase by 2041. *The Strategic Assessment of Need for sports halls in London 2017-2041* shows that the borough has one of the highest levels of unmet demand, which is likely to increase by 2041. *The Strategic Assessment of Need for swimming pools in London 2017-2041* shows that the borough has amongst the lowest percentage of provision per person and a high level of unmet demand, which is likely to increase by 2041.

5C3.25 There are five nursery schools, 65 primary schools and 19 secondary schools in Lambeth. There are also five special schools, two pupil referral units and five colleges across the borough. School place provision in the borough has recently been expanded. Since 2012, 25.7 additional forms of primary places have been provided and 13.5 forms of entry have been provided at the secondary level. A further 450 extra additional sixth form places have also been provided and 165 additional Special Education Needs and Disabilities (SEND) places have been added.

5C3.26 The Cabinet of the council considers an annual report on pupil place planning, the most recent of which was in December 2017 (Pupil Place Planning and Resultant Capital Programmes). This report sets out the expected growth of pupil numbers and calculates whether there is a surplus or shortfall in school places for both primary and secondary education. It concludes that with planned provision there will be a surplus of reception places across the borough (except in Norwood), and therefore the need for primary places can be met across the borough until 2023/24. However, there is a shortfall of places across the borough for secondary places from 2018/19 of 174 places, which is projected to worsen to a shortfall of 1,090 places if not addressed.

Likely evolution without the draft Revised Lambeth Local Plan

5C3.27 In the absence of the new Draft Revised Lambeth Local Plan October 2018, 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) may diminish. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of draft revised Policies

5C3.28 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 3, access and services. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

5C3.29 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	infrastructure
D2 – Presumption in favour of sustainable development	SI2 – New or improved social infrastructure
D3 – Infrastructure	SI3 - Schools
D4 – Planning obligations	T1 – Sustainable travel
H1 – Housing growth	T2 – Walking
H2 – Affordable housing	T3 – Cycling
H3 – Safeguarding existing housing	T4 – Public transport infrastructure
H4 – Housing size and mix	T5 – River transport
H5 – Housing standards	T6 – Parking
H6 – House conversions	T8 – 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 – Inclusive environments
H10 – Gypsy and Traveller needs	Q6 – Urban design / public realm
H11 – Estate regeneration	Q16 – Shop fronts and signage
H12 – Build to rent	Q24 – River Thames
H13 – Shared living	PN1 – Waterloo
ED7 – Town centres	PN2 – Vauxhall
ED8 – Evening economy and food and drink uses	PN3 – Brixton
ED9 – Public Houses	PN4 – Streatham
ED11 – Local centres and dispersed local shops	PN5 – Clapham
ED14 – Hotels and other visitor accommodation	PN6 – Stockwell
SI1 – Safeguarding existing social	PN7 – West Norwood
	PN8 – Kennington / Oval
	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and monitoring policies D1 – D4

5C3.30 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 H1 – H13

5C3.31 Maximising housing growth and associated population growth will place additional demand on existing services, leisure and amenities in the borough and provision for social infrastructure will need to be appropriately planned. However overall it is

considered that policies H1- H5 will result in positive effects on SA Objective 3. Policy H1 maximises housing growth, policy H2 makes provision for affordable housing and policy H3 seeks to safeguard existing housing (including affordable), all of which seek to provide increased accessibility to housing. Policy H4 provides for a range of housing sizes from one bedroom units to 3-bed units and more. This enables older people the option to downsize and remain in the borough or their local area, and provides provision of families with larger sized units. All developments should include a range of dwelling sizes, making the development inclusive for all types of people and enabling mixed and balanced communities. The policy also allows flexibility on size of accommodation for specialist housing needed in the borough. Policy H5 makes good provision for outdoor amenity space in residential developments and children's play space. Policy H6 ensures retention of family-sized homes in the borough by protecting dwellings of less than 150m² (as originally constructed) from conversion into flats. Policy H6 seems to focus on protecting streets from harmful cumulative impacts to environmental quality, local amenity and parking arising from conversion, rather than spatially recognising that some locations would be better suited to conversion into *several* flats given their proximity to services, facilities and public transport. **Therefore, to better ensure accessibility to key services and facilities (and better protect more vulnerable and/or low income groups), conversion of a dwelling into more than 2 self-contained units should perhaps be limited or encouraged in areas either close to town centres or in areas with a PTAL rating of 4 or more. It is recommended that the policy team further consider whether this would be appropriate, taking into account housing targets assigned to the borough [SA RECOMMENDATION 22].**

5C3.32 Policy H7 is on student housing and clause (a) (v) states that student housing should be 'located in an area with good public transport access, and easy access to local shops, workplaces, services and community facilities'.

5C3.33 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. The policy provides for 'adequate provision for parking for visiting healthcare professionals' and where appropriate the safe storage of wheelchairs and mobility scooters. It is noted that the policy has changed from the adopted Local Plan 2015 policy in that there is no longer provision for visitors car-parking. **Arguably, those in specialist housing care need, and would benefit more, from visitors than other forms of housing, to help facilitate social interaction, engagement and avoid isolation for the boroughs most vulnerable residents. It is recommended that the policy team revisit this proposed change to policy in light this consideration and in terms of tackling inequalities [SA RECOMMENDATION 23].** The supporting text of the policy refers to policy T7 for parking provision. Policy T7 applies London Plan policies for car-parking. London Plan policy T6.1 and Table 10.3 state that for Lambeth in areas of PTAL 4 or more, all residential development should be car-free. Accordingly, this will mean in these areas there will be no provision for visiting healthcare professionals to park. **For clarity it is recommended the policy team revisit this anomaly and intended car-parking provision for specialist housing proposals [SA RECOMMENDATION 24].**

5C3.34 Similarly, policy H9 seeks to be fully inclusive by providing for new hostels and houses in multiple occupations, which are often needed by more vulnerable groups. The policy states that hostels and HMOs should be accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers. It is considered that policy H9 should result in significant positive effects in terms of achievement of SA objective 3.

- 5C3.35 Policy H10 provides for gypsy and traveller needs. This policy aims to result in positive effects for this group and any new site proposed needs to provide accommodation from which travellers can access services and community facilities, in particular schools and health services.
- 5C3.36 Some estate regeneration schemes may be located in areas with poor access to necessary social infrastructure, for example GP surgeries, nurseries, community meeting space. A consideration to improve accessibility to services and facilities could be to make provision for such services where accessibility is poor. Policy S2 is noted, however this appears to only apply to meet the *additional* need that will arise, and would not apply where housing is replaced through regeneration. **The policy team may wish to further consider this, particularly for large-scale estate regeneration schemes that do not result in additional units [SA RECOMMENDATION 25].**
- 5C3.37 Policy H12 build to rent provides another housing product that helps improve accessibility to housing, particularly for low income groups. Similarly, Policy H13 on large-scale purpose-built shared living may provide a housing option for those on lower/average incomes, those seeking to downsize, or those seeking social interaction.
- Economic Development policies ED7, ED8, ED11, ED14***
- 5C3.38 Policy ED7 supports vitality and viability of Lambeth town centres including safeguarding local shops and other local services to meet community need within neighbourhoods. Evening and food and drink uses (policy ED8) using pavement space 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, and stopping up of public highway will be resisted, especially in town centres. Policy ED11 seeks to support and protect local centres and local shops in meeting day-to-day needs of communities. Loss of dispersed local shops will only be supported where essential daily goods are within a reasonable walking distance, thereby seeking to maintain accessibility for all and reduce the need to travel. Policy ED14 on visitor accommodation is commended, particularly clause (c) on accessibility and inclusion and submission of the Inclusive Design Statement with all applications for visitor accommodation.
- Social Infrastructure policies S1 – S3***
- 5C3.39 Overall it is considered that policies S1 (safeguarding existing social infrastructure), S2 (new or improved social infrastructure) and S3 (schools) will likely result in significant positive effects on the attainment of SA Objective 3 as these seek to protect existing community facilities and ensure new community premises are accessible to the community. The recommendation made in SA Objective 2 Health on making new sports and leisure facilities in hotels, purpose-built student housing and shared living available for the general public to access (rather than just groups identified by the council) is further endorsed here with respect to maximising benefits under SA Objective 3 Access and Services. Policy S2 seeks to ensure social infrastructure keeps pace with population growth by making provision for social infrastructure to meet additional need resulting from development. Clause (d) states that ‘new social infrastructure should be made available to all residents irrespective of tenure’. It further states ‘if it is not possible or effective to meet the additional need through provision of new social infrastructure *on site*, a payment in lieu will be sought...’ (emphasis added). **It is not clear why new social infrastructure need be provided on-site (particularly for schemes of, for example, 26 residential units).**

New off-site provision within walking distance of the development site would be reasonable and would also serve the wider local area, maximising positive effects with regards to SA objective 3, as well as SA objectives 4, 5, and 7. The same argument may apply to clause (c) of the policy on childcare provision in residential developments of more than 500 units. It is recommended this is revisited by the policy team [SA RECOMMENDATION 26].

Transport policies T1 – T6 & T8

5C3.40 Generally, it is considered that the transport policies will result in significant positive effects in providing a physical environment, including all streets, that is fully accessible to all, prioritising those with particular mobility needs; 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.

5C3.41 **In terms of parking provision in Lambeth, the policy team may wish to consider whether certain uses (for example specialist housing, healthcare related uses) justify some level of car-parking provision regardless of PTAL ratings.** (London Plan standards appear to only cover residential, office, retail and hotels and leisure uses.) (Also see SA recommendations SA4 and SA5 para 5C3.33). **[SA RECOMMENDATION 27]**

Environment and green infrastructure policies EN1 and EN2

5C3.42 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. Provision of green infrastructure in developments helps improve access to green open spaces and wildlife habitats.

Quality of the Built Environment policies Q1, Q6, Q16, Q24

5C3.43 Policy Q1 inclusive environments is an important policy and is considered to have significant positive effects with regards to achieving SA Objective 3.

5C3.44 Overall it is considered that policy Q6 urban design: public realm provides for an accessible inclusive environment, through for example, 'safe, attractive, uncluttered, co-ordinated public realm...'; and 'improved legibility, permeability and convenient access via direct routes for all users...'. It is noted that clause (vi) refers to permeable paving, which gives rise to whether it would be appropriate for the policy to also make reference to paving that is easy and safe for all users to use in all weather conditions. For example, some forms of paving can get slippery in wet weather, which can be a hazard for older and younger people. Similarly some paving is more difficult for wheelchair users and pushing prams and buggies. **The policy team may wish to revisit this policy in terms of surface materials used and their ease of use for different equality groups.** It is noted there is a council agreed standard for streetscape materials and street furniture and perhaps further guidance/detail should be provided in this standard. **[SA RECOMMENDATION 28]**

5C3.45 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 Q16, shop fronts, somewhat provides for these groups by clause (iv)

'adequate entrance doors' and clause (vi) 'have level entrances where possible'. Coupled with other Draft Revised Lambeth Local Plan October 2018 policies, in particular policy Q1, positive effects in terms of accessibility and inclusiveness regarding shopfronts should result.

5C3.46 Proposals fronting River Thames should maintain and create public accessible spaces and routes along the river for a continuous riverside walkway (policy Q24) and this is supported in terms of SA objective 3.

Places and neighbourhoods policies PN1 – PN11

5C3.47 In combination with other Draft Revised Lambeth Local Plan October 2018 policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN11) should result in significant positive effects in relation to SA Objective 3. Most of the major places and neighbourhoods seek mixed used development (e.g. Vauxhall, Waterloo, Brixton, Streatham, Clapham, West Norwood) and all policies seek some sort of public realm improvements such as linkages, permeability and connectivity as well as public transport accessibility and capacity improvements. **These policies could be strengthened to ensure public realm environments are fully accessible and/or inclusive, for example PN1(e) could be reworded to 'promote a high quality, safe and accessible public realm...' to better align it with one of the opening statements of the policy: 'to support these key roles and further growth, Waterloo and South Bank needs a high quality, safe, accessible public realm that matches the significance of the area'. [SA RECOMMENDATION 29]**

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C3.48 Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that the Draft Revised Lambeth Local Plan October 2018 will have significant positive effects albeit with some element of uncertainty on the existing baseline and ensuring that everyone has access to community services and facilities.

Table 12: Summary assessment of effects of Draft Revised Lambeth Local Plan October 2018 on Access and Services

Assessment of effects of 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 Revised Lambeth Local Plan October 2018 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. To help address this need and where development proposals are required to provide social infrastructure to meet their additional need; it is considered that such social infrastructure need not necessarily be required 'on-site' – within walking distance of the site would be reasonable, and also enable others in the local area to use such service/facility.</p> <p>Residential conversion of a dwelling into more than 2 self-contained units should have some spatial controls for example, be located in areas close to town centres, facilities and services and/or in areas with high PTAL ratings.</p> <p>Those in specialist housing care need would arguably benefit more from visitor than other forms of housing to help facilitate social interaction and avoid isolation. It is therefore recommended there is car-parking provision for this and other related landuses.</p> <p>However, there is a level of uncertainty regarding delivery of some transport infrastructure and social infrastructure, 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 for example, new station stop on the London Overground at Brixton and/or Loughborough Junction 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

Recommendations for monitoring likely significant effects

5C3.49 It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Number of disabled parking spaces per completed major development
- Modal Share – walking, cycling and public transport
- Infrastructure Delivery Plan updates
- Average distance of households and bus stations to health/medical centres
- Proximity of new housing developments to services, facilities and employment

5C4 INFRASTRUCTURE

5C4.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

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

5C4.2 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
- Flood defences
- Transport.

Relevant policy objectives

National Level

5C4.3 The *National Planning Policy Framework 2018* highlights the significance of infrastructure delivery and its relationship with strategic planning policies. In paragraph 20, it identifies that sufficient provision should be made for:

- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)
- Community facilities (such as health, education and cultural infrastructure)
- Green infrastructure.

Paragraph 92 further expands on what is meant by community facilities to include local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship).

Regional Level

5C4.4 The *draft London Plan 2018* contains a wide range of policies pertaining to the various forms of social, physical and environmental infrastructure to support development. This includes health provision, education, community, play youth, recreation, sports, faith, emergency services, visitor infrastructure, green infrastructure, sustainable infrastructure like water, energy and digital connectivity, and transport infrastructure. The Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, and potentially other strategic transport infrastructure.

Baseline conditions and existing issues

Cemeteries and Crematoria

5C4.5 The Council owns and manages three cemeteries, providing burial provision for its residents. Of these, West Norwood Cemetery is located within the borough and Lambeth Cemetery and Streatham Cemetery are located outside of the borough in LB Wandsworth.

5C4.6 A report to the GLA in 2012 (An Audit of London Burial Provision, University of York) identified that West Norwood and therefore had no capacity to meet future needs. The other Council owned cemeteries were reliant on created graves – i.e.

using spare space within the cemeteries to create graves – and therefore had very little capacity for additional burials.

- 5C4.7 The LB Lambeth Cemetery Capital Investment Priorities, Officer Delegated Decision Report (February 2015), identified that there were 1,400 burial plots available in Lambeth Cemetery but no capacity in Streatham and West Norwood Cemeteries. It detailed that with investment in West Norwood, capacity in the Council's Cemeteries would increase the amount of available burial plots to 2,750, which will meet the Council's need for the next 15 years.

Education

- 5C4.8 LB Lambeth is the Local Education Authority (LEA) and have responsibility for state schools within the borough. Amongst its duties are to ensure that there are adequate school places available to serve its population.

- 5C4.9 There are five nursery schools, 65 primary schools and 19 secondary schools in Lambeth. There are also five special schools, two pupil referral units and five colleges across the borough. School place provision in the borough has recently been expanded. Since 2012, 25.7 additional forms of primary places have been provided and 13.5 forms of entry have been provided at the secondary level. A further 450 extra additional sixth form places have also been provided and 165 additional Special Education Needs and Disabilities (SEND) places have been added.

- 5C4.10 The December 2017 Cabinet Report, Pupil Place Planning and Resultant Capital Programmes sets out the expected growth of pupil numbers and calculates whether there is a surplus or shortfall in school places for both primary and secondary education. It concludes by stating that with planned provision there will be a surplus of reception places across the borough (except in Norwood), and therefore the need for primary places can be met across the borough until 2023/24. However, there is a shortfall of places across the borough for secondary places from 2018/19, which is likely to worsen if not addressed.

Emergency Services

- 5C4.11 In Lambeth, emergency services are provided by the London Ambulance Service, the Metropolitan Police Service and the London Fire Brigade.

- 5C4.12 The London Ambulance Service, in Our Strategic Intent 2018/19 – 2022/23, sets out how the service will deal with growing demands in London caused by an increase in population and the related rise in calls and incidents. The document acknowledges that assessing and redeveloping the estate will be necessary to meet future needs but that such work is ongoing. A Strategy is set to be published in 2018 which may detail infrastructure needs further.

- 5C4.13 The Metropolitan Police Service Business Plan 2017-18, sets out the priorities for the Police Service. In relation to their estate, the business plan makes clear that they wish to reduce running costs and dispose some of their estate to invest in operational services and refurbishment. The disposal and refurbishment strategies have yet to be published. The latest Estate Strategy ran between 2013 and 2016 and is now considered out of date.

- 5C4.14 The London Fire Brigade's Draft Asset Management Plan (17 March 2017) sets out how the London Fire Brigade will manage its estate of 102 Fire Stations and other premises. In Lambeth, the redevelopment of Lambeth Fire Station is identified as a

priority and analysis suggests that there is a desire to replace Brixton Fire Station, but further detail is not provided.

5C4.15 The Asset Management Plan was produced when the Fire Brigade was run by London Fire and Emergency Planning Authority but it is now run by the Greater London Authority. The Fire, Resilience & Emergency Planning Committee of the GLA states that an estate management is part of its upcoming work.

Health

5C4.16 The Lambeth Clinical Commissioning Group (CCG) is a group of 44 GP practices in the borough who work with the Council and pharmacies, dentists, hospitals and mental health providers, to commission NHS services for residents.

5C4.17 Mental health services in Lambeth are provided by the South London and Maudsley (SLaM) NHS Foundation Trust who operate sites throughout south London, including in the borough.

5C4.18 Lambeth is home to two major hospitals serving Lambeth and other parts of London. King's College Hospital NHS Foundation Trust operates King's College Hospital in Herne Hill ward. St Thomas' Hospital in Bishop's ward is operated by the Guy's and St Thomas' NHS Foundation Trust.

5C4.19 Lambeth Healthcare Infrastructure Analysis undertaken by the London Healthy Urban Development Unit in July 2018 for the Lambeth CCG, sets out the future need for GP space by each CLIP area and CCG Locality in Lambeth. It identifies a shortfall of 16 GP clinical rooms by 2028 across the borough, with a shortfall identified in the north of the borough and in Streatham.

5C4.20 Work done by Inner Circle Consulting for Lambeth CCG in June 2018 (Brixton Health Hub: GP and Community Health Demand/Supply) identifies that there is not a shortfall for GP provision in the Brixton study area but that provision may be located in the wrong location with it being noted that there are no clinical examination rooms within Coldharbour ward.

5C4.21 The Guy's and St Thomas' Strategic Plan 2014-2019, identifies that a key challenge is to improve the productivity of their assets including by consolidating and rationalising their estate and space to increase capacity and release space for future growth. Their Operational Plan 2017/18 and 18/19 identifies capital programmes including a need to increase capacity for surgical theatres and for the critical care and Haemodialysis Unit at St Thomas's Hospital, as well as the completion of the redevelopment of the Accident and Emergency department.

5C4.22 The Council will work with King's College Hospital NHS Foundation Trust, as it progresses a Masterplan for the redevelopment of the King's College Hospital site.

5C4.23 A partnership of the NHS providers and CCGs across the boroughs of Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark, including the organisations described above (collectively known as the South East London Sustainability and Transformation Partnership) produced an Estate Strategy and Plan (2016-2021). This identifies a vision to improve health and well-being across south east London by collaborating with each other to reduce cost but increase quality, with a key aim being to improve the utilisation and efficiency of the NHS estate.
Libraries and Community Hubs

- 5C4.24 Local authorities are required to provide library services under the 1964 Public Libraries and Museum Act. There are currently 10 library buildings in the borough, helping to meet the Council's obligations.
- 5C4.25 The LB Lambeth Culture 2020 Cabinet Report (October 2015) identifies the difficult financial environment relating to the continued provision of libraries but identifies how the Council will deliver a sustainable library service built around five town centre libraries and five neighbourhood libraries.
- 5C4.26 The LB Lambeth Future Options for Lambeth Archives (October 2017) identifies a need for increased archives provision in the borough in order to meet future needs and national standards. It explains that a site has been chosen for the reprovision (301 Kennington Lane). A feasibility study will soon be commissioned by the Council to further explore the development of the site.
- Parks and Open Spaces*
- 5C4.27 There are over 60 parks and open spaces in Lambeth, 14 of which have been awarded the Green Flag award – the national standard for high quality parks and green spaces in the country. They promote health and well-being and increase community cohesion, to the benefit of those who live, visit and work in the borough.
- 5C4.28 The Council's Parks and Open Spaces Capital Investment Plan (2014/15 – 2018/19) identifies costed projects within each park/open space and how they are to be delivered. The Plan and the projects contained within it are in the process of being reviewed.
- Sports and Leisure*
- 5C4.29 Sports and Leisure facilities are provided across the borough by both the Council and private operators. These include sports pitches and courts, swimming pools and an ice rink. Most of the outdoor facilities are located within the Council's parks and open spaces. Indoor provision is provided in the form of six leisure centres, which are managed by GLL on the Council's behalf.
- 5C4.30 The Culture 2020 Cabinet Report (October 2015) identified the importance of providing sports and leisure facilities in the borough despite the difficult financial climate and stated a commitment to continue to invest in leisure centre facilities.
- 5C4.31 The Greater London Authority commissioned Sport England to undertake a number of needs assessments for sports and leisure facilities.
- The Strategic Assessment of Need for artificial grass provision in London 2017-2041 shows that a large portion of the demand for such pitches is met in neighbouring authorities and that the borough has one of the highest levels of unmet demand, which is likely to increase by 2041.
 - The Strategic Assessment of Need for sports halls in London 2017-2041 shows that the borough has one of the highest levels of unmet demand, which is likely to increase by 2041.
 - The Strategic Assessment of Need for swimming pools in London 2017-2041 shows that the borough has amongst the lowest percentage of provision per person and a high level of unmet demand, which is likely to increase by 2041.
- Transport/Public Realm*
- 5C4.32 In London, the Mayor/Transport for London (TfL) sets out the strategic direction for transport in the Mayor's Transport Strategy (MTS), runs the tube services (eight of which are in Lambeth), bus services, London Overground, river services, bike hire

and regulates private hire vehicles such as taxis. TfL also manages the major roads (the red routes). TfL provides transport funding to the Council and the Council manages all local roads in the borough.

- 5C4.33 Lambeth benefits from 14 railway stations, which has services run by Southeastern, Southern Railway, South Western Railway and Thameslink. Network Rail owns and runs Waterloo Station, the country's largest station in terms of passenger numbers. The remaining stations are operated by the relevant train operating companies.
- 5C4.34 The MTS identifies a desire to implement a healthy streets approach based on three themes:
- Healthy street and healthy people – wants to encourage sustainable transport modes and reduce car use to improve health
 - A good public transport experience – wants to continue to encourage a shift from private transport to public transport
 - New homes and jobs – seeks to plan the city around walking, cycling and public transport to ensure growth benefits
- 5C4.35 Priorities for Rail Improvement in Lambeth (2018), written by the Railway Consultancy on behalf of Lambeth Council identifies a number of rail schemes that could come forward, making an assessment of the benefits and deliverability of such schemes and whether they should gain Council support.
- 5C4.36 London's strategic infrastructure requirements – an evidence base to help deliver the Mayoral strategies (2017), produced by Arup on behalf of the GLA, identifies strategic infrastructure to meet Mayoral aims, including strategic transport infrastructure. It identifies the planning status and funding status of each project.
- Utilities*
- 5C4.37 In Lambeth, a range of different companies provide utility services. Water and sewage services are provided by Thames Water, electricity is distributed by UK Power Networks and gas is distributed by SGN.
- 5C4.38 Lambeth Council is the Local Lead Flood Authority for the borough and is responsible for flood risk management in relation to surface water, groundwater and small ditches and watercourses. The Environment Agency. The environment agency are responsible for managing flood risk from the Thames and ensuring that the quality of water is protected and enhanced.
- 5C4.39 The Thames Water Our long-term strategy 2015-2040 sets out the strategy for water resources, treatment and distribution and also sets out the strategy for wastewater collection and treatment. The Draft Water Resources Management Plan 2019 identifies how Thames Water will maintain the balance between water supply and demand. It identifies that across London there would be a deficit in water supply unless identified actions to reduce demand and develop water resource infrastructure are not undertaken. Such infrastructure is identified in short, medium and long-term tranches. The Plan will be finalised later in 2018.
- 5C4.40 The Thames river basin management plan, December 2015, produced by the Environment Agency (EA) sets out how the water quality in the Thames River Basin will be protected and enhanced. The TE2100 Plan, published by the EA in November 2012, sets out how flood risk will be managed throughout London and the Thames estuary. Lambeth lies within Action Zone 2 of the plan area and the Wandsworth to Deptford Policy Unit. Within this area the policy is to take further

action to reduce flood risk beyond that required to keep pace with climate change and includes recommendations such as the need to maintain, enhance or replace defence walls and active structures to prevent flooding.

- 5C4.41 The Lambeth Local Flood Risk Management Strategy 2014-2020 sets out the following three objectives of how flood risk will be managed
- Building community resilience through empowering residents to help themselves
 - Maximising benefits through holistic water management and working in partnership with others
 - Delivering sustainable and proportionate mitigation for existing and future communities

Likely future evolution without the draft revised plan

- 5C4.42 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 an up-to-date Local Plan delivery of some infrastructure may be less co-ordinated and not keep pace with population and housing growth in terms of addressing identified need in the local environment in a timely manner. Impacts of poor provision are likely to deteriorate further as a result of increased development or pressure on existing infrastructure.

- 5C4.43 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. From 2018/19 there is a shortfall of 174 secondary school places, which is projected to worsen to a shortfall of 1,090 places if not addressed. 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 an up-to-date Local Plan increases risk that necessary and appropriate infrastructure is not delivered. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of Draft Revised Lambeth Local Plan October 2018 policies

- 5C4.44 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 4, Infrastructure. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.
- 5C4.45 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring
D2 – Presumption in favour of sustainable development
D3 – Infrastructure
D4 – Planning obligations
H1 – Housing growth
H10 – Gypsy and Traveller needs

H11 – Estate regeneration
ED3 –Key Industrial and Business Areas
ED4 – Non-designated industrial sites
SI1 – Safeguarding social infrastructure
SI2 – New or improved social infrastructure
SI3 - Schools
T1 – Sustainable travel

T2 – Walking	Q14 – Development in gardens
T3 – Cycling	Q21 – Registered parks and gardens
T4 – Public transport infrastructure	Q24 – River Thames
T5 – River transport	PN1 – Waterloo
T9 – Digital connectivity	PN2 – Vauxhall
EN1 – Open Space	PN3 – Brixton
EN2 – Food growing	PN4 – Streatham
EN3 – Decentralised energy	PN5 – Clapham
EN5 – Flood risk	PN6 – Stockwell
EN6 – Sustainable drainage systems and water management	PN7 – West Norwood
EN7 – Sustainable waste management	PN8 – Kennington / Oval
Q6 – Urban design / public realm	PN9 – Herne Hill
Q9 – Landscaping	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and monitoring policies D1 – D4

5C4.46 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 Delivery Plan 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 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, 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.

Housing policy H1, H10, H11

5C4.47 Increased housing will result in increased pressure and demand on the borough's infrastructure and it will be important that the council continues to work with infrastructure providers so that infrastructure keeps pace with population growth and demand. The policy recognises this by optimising levels of residential density having regard to accessibility by walking and cycling, existing and planned public transport (including PTAL) and the capacity and quality of provision of surround infrastructure. Policy S2 also seeks to mitigate effects of housing growth on social infrastructure. Developments of 25 residential units or more will need to consider anticipated impact on social infrastructure, and meet additional need that will arise where this cannot be met adequately through existing facilities. If this is not possible, a payment in lieu will be sought. Similarly a clause on childcare provision also applies. **The policy team may wish to consider referencing policy S2 in the housing section of the local plan (perhaps as supporting text) to help applicants and better facilitate transparency of policy expectations. Also, the policy team may wish to consider mentioning provision of social infrastructure in policy H11 estate regeneration, particularly for large-scale estate regeneration schemes [SA RECOMMENDATION 30].** Policy H10 seeks to safeguard the existing gypsy and traveller site in Streatham Vale. Any new site proposed will need to have a supply of essential services (mains gas, electricity, water, sewerage, drainage and waste disposal, as well as access to services and community facilities, in particular schools and health services.

Economic development policies ED3 and ED4

5C4.48 Policy ED3 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 ED4 also seeks to intensify business uses (B1c, B2, B8 or *sui generis* industrial uses) on non-designated industrial sites. Sites are protected for such uses unless there is no reasonable protect sites and premises in business use. However, loss of land or floorspace in business, prospect of the site being used for industrial and related purposes. This helps ensure land supply for waste management infrastructure and utilities infrastructure. Overall, the policy contributes positive effects for SA Objective 4 although deliverability of specific infrastructure is considered uncertain.

Social infrastructure policies S1 – S3

5C4.49 Overall it is considered that policies S1 – S3 provide a good foundation for social infrastructure in the borough in relation to SA Objective 4. Policy S2 is innovative in its approach to improving accessibility of facilities, making sure new sports and leisure facilities provided as part of purpose-built student accommodation, shared living or hotels are made available for public access. This helps increase accessibility of facilities and meet demand. As outlined earlier, it is further recommended that this access is for the wider public rather than just groups identified by the council. Similarly, the policy requires proposals of 25 residential units or more to assess existing and additional social infrastructure need, and provide any unmet need on-site. As previously mentioned, it is considered that such provision need not be provided on-site necessarily, but with walking distance of the site would be reasonable, and open the facility up for wider public use. Where provision is not provided a payment in lieu will be sought. In as far as planning can control, it is considered that the policies effectively seek to achieve SA objective 4. However, actual deliverability of social infrastructure involves co-operation and joint-working with different organisations, as well as significant funding. Infrastructure Delivery Plan identifies considerable funding gaps for some transport projects (eg new Overground station at Brixton/Loughborough Junction, step-free access at Brixton, Streatham stations), accommodating additional school placements and healthcare, for example adequate healthcare provision necessary for the expected growth at Vauxhall is also uncertain. Infrastructure necessary to support expected population growth from growth in Opportunity Areas and achievement of housing targets is essential in achieving sustainable development. Deliverability is a key concern.

Transport policies T1 – T5, T9

5C4.50 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(d) 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, Infrastructure Delivery Plan provides detail as to future transport infrastructure improvements and projects, as well as funding information. However, as previously mentioned, deliverability remains uncertain for some infrastructure projects in terms of funding. 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 Draft Revised Lambeth Local Plan October 2018 supports.

5C4.51 Policy T9 recognises the importance of high quality digital infrastructure and expansion of electronic communications networks and should result in positive effects for SA objective 4, as well as the social objectives 3(access and services), 5(equality), 7(liveability). Access to this type of infrastructure is increasingly considered as necessary in today's world (akin to electricity, sewage etc), rather than a 'nice to have'. Provision and availability of affordable digital infrastructure will help address accessibility barriers, particularly among more vulnerable groups of the borough.

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

5C4.52 Policy EN1 seeks to protect existing open space and green infrastructure, biodiversity, improve access to open space, and increase the quantity and quality of open space and green infrastructure including in areas of open space deficiency. The policy also seeks to create or extend green chains and links thereby further contributing to the green infrastructure network in the borough. Application of the urban greening factor is expected to significantly increase green infrastructure provision in the borough, with the multitude of positive effects that it brings (eg health and well-being, air quality, biodiversity, sense of place, pride of place). Similarly policy EN2 also contributes to the green network in the borough.

5C4.53 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.

5C4.54 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 to ensure these are maintained, remedied and improved where necessary.

5C4.55 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.

5C4.56 It is considered that Policy EN7 on sustainable waste management makes good provision for safeguarding existing waste management sites and new areas/sites in KIBAs and other appropriate locations, given the limited land supply in the borough.

Quality of the Built Environment policies Q6, Q9, Q14, Q21, Q24

5C4.57 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 – PN11

5C4.58 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 and West Norwood 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 achieve this particularly well to ensure the continued vitality of these district centres). Some specific infrastructure is highlighted in some policy, for example, health facilities, district heat networks and/or is supported by the Infrastructure Schedule, although it is considered this could go further and have a more consistent approach across all the policies. For example, are more secondary school places required in these places and neighbourhoods? And should the policies better provide for the shortfall of 16 GP clinical rooms by 2028 across the borough, particularly in the north of the borough and in Streatham?

5C4.59 It is noted that references to school places has been removed from policy within the Local Plan 2015. The level of growth proposed for Brixton would benefit from a new station at Brixton or Loughborough Junction providing accessibility to north east London via the London Overground. However, as already highlighted, delivery of various types of infrastructure is a key concern across the borough.

5C4.60 **Summary of Draft Revised Lambeth Local Plan October 2018 policies**
Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that the Draft Revised Lambeth Local Plan October 2018 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 13: Summary assessment of effects of Draft Revised Lambeth Local Plan October 2018 on Infrastructure

Assessment of effects of 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 Draft Revised Lambeth Local Plan October 2018 makes clear that housing growth, economic development and environmental sustainability cannot be achieved without a wide array of essential infrastructure. The Draft Revised Lambeth Local Plan October 2018 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 and others are currently being completed, such as new underground station at Nine Elms. However, there remain uncertainties about the <u>delivery</u> 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 in 2020); funding required – for some of the proposed infrastructure funding has not yet been secured (e.g. new rail station at Brixton and/or Loughborough Junction, 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.	Recently completed upgrade and improvement works of some underground lines and stations are providing some alleviation to capacity issues at some stations. 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 major developments, in which negative impacts will likely be experienced in the interim. Delivery of several infrastructure projects considered necessary to support projected growth are unlikely until the long term, possibly at the earliest.	Permanent, however there will be temporary effects until necessary infrastructure is delivered (effects relating to construction and lack of infrastructure in the interim).

5C4.45 **Recommendations for monitoring likely uncertain effects**
It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Infrastructure Delivery Plan updates

5C5 EQUALITY AND DIVERSITY

5C5.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

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

5C5.2 To achieve this objective, plan policies should promote a culture of equity, fairness and respect for people and the environment; improve environmental conditions for Lambeth's deprived areas and deprived communities; reduce poverty and social exclusion; remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination; promote social cohesion within and between population groups; enable social integration between minority groups and wider society; address housing, cultural, social and employment needs of those with protected characteristics; and promote adequate accessibility, in particular for older and disabled people.

5C5.3 Once adopted, 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.

Relevant policy objectives

National Level

5C5.4 *National Planning Policy Framework 2018*, paragraph 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrians and cycle connections within and between neighbourhoods, and active street frontages.

5C5.5 Paragraph 127 states planning policies 'should ensure developments: ...create places that are safe, inclusive and accessible and which promote health and well-being...'

5C5.6 Interestingly, the words 'equality', 'inequality' and 'diversity' are not mentioned in the NPPF 2018. The word 'inclusive' is mentioned twice, as demonstrated above. There are two references to 'different groups' (in the context of housing delivery)'; paragraph 61 that states 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)'; and paragraph 72: 'ensures that a variety of homes to meet the needs of different groups in the community will be provided'.

5C5.7 The public sector Equality Duty (PSED) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. The broad purpose of the equality duty is to integrate consideration of equality and good relations into the day-to-day business of public authorities. The equality duty covers the nine protected characteristics: age, disability, gender, gender reassignment, pregnancy and maternity, ethnicity, religion or belief, sex and sexual orientation and

marriage or civil partnership.

Regional Level

5C5.8 The *London Plan 2018* contains a number of policies to tackle inequality and ensure equal life chances for all, and it is considered that equality and provision of protected groups (particularly disabled, older persons and children) is thread through the whole London Plan. Some key policies include GG1 - building strong and inclusive communities, GG3 – creating a healthy city, H14 – supported and specialised accommodation, D5 – accessible housing and there are many more reference to equality in housing, town centres, night-time economy (safety of women, LGBT and BAME groups are particularly considered) employment, social infrastructure transport policies.

Local Level

5C5.9 The *Lambeth Borough Plan 2016 – 2021* sets out three priorities: creating inclusive growth, reducing inequality, and building strong and sustainable neighbourhoods. The Plan contains a number of goals and ambitions to achieve these priorities that also help create an environment that is accessible to and fully inclusive for all people.

5C5.10 *Lambeth Equality Commission Report and Recommendations 2017* sets out evidence and recommendations on four key themes: education and learning; income and employment; participation, decision-making and leadership; and crime and justice. These address some of the areas where there are significant inequalities between different groups of residents, but also because they are areas where there is the greatest potential for influencing inequality by taking action at a local level.

5C5.11 *Time for Change: Disability 2018* is a report prepared by the Lambeth Equality Commission on an event on 27 June 2018 aimed at taking feedback, ideas and potential solutions to reducing exclusion from disabled residents and organisations. The Lambeth Equality Commission Report 2017 found that disabled people are one the groups most likely to experience inequality across different areas of their lives. It recommended a set of actions the council should take to help reduce inequalities affecting disabled people. The Time for Change report sets out further analysis to this.

Baseline conditions and existing issues

Age

5C5.12 Lambeth's age profile is heavily influenced by the borough's status as a destination for working age migrants from UK and abroad. Over half of the population is younger working aged (20-44 years), and there relatively few children and young people under 20 - only Wandsworth, Hammersmith & Fulham, Camden, Islington, Kensington & Chelsea and Westminster have a smaller proportion of children. Lambeth has the highest number of people aged 25-29 of any London borough. Most immigrants are aged 20-24, and most out-migrants are aged 20-44. Many families leave the borough with small children. The borough has a small proportion of people aged 60+ (SOB 2016).

5C5.13 Table 14 below demonstrates that various ethnic groups in the borough have different age profiles.

Table 14: The various ethnic groups in the borough have different age profiles

Ethnic Category	Groups	0-19 years	20-44 years	45-59 years	60+ years
All ethnicities		22%	51%	17%	11%
White¹¹	Largest young working age population	13%	59%	16%	12%
BAME	More children and young people	32%	42%	17%	9%
Black Caribbean	Oldest age profile	24%	33%	25%	18%
Black African	High proportion of children and young people	34%	40%	19%	8%
Black Other	Highest proportion of children and young people	44%	40%	13%	4%

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.

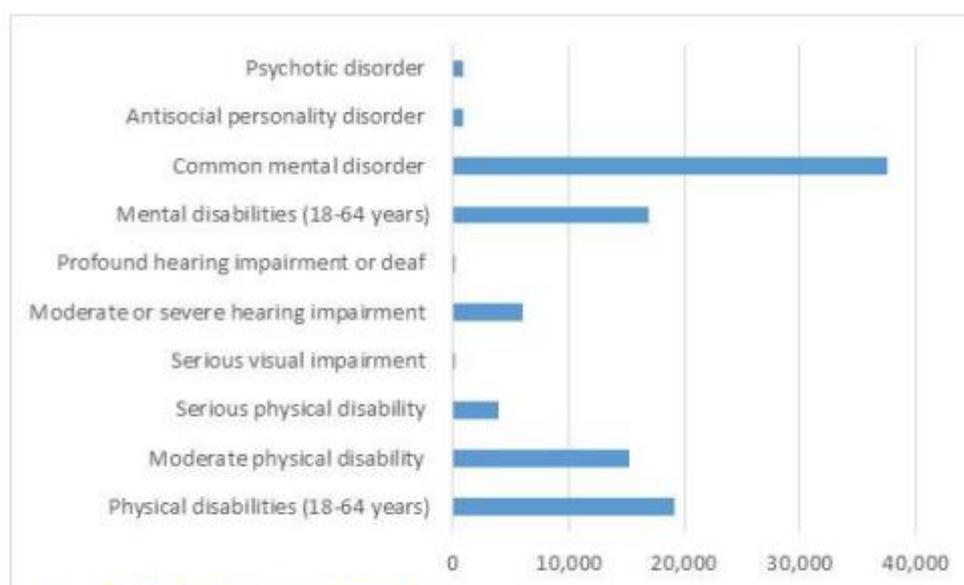
Potential issues affecting children and young people

- 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. 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.
- 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 secondary level.

5C5.14 *Disability*

There are many measures related to disability, each with a slightly different emphasis. For example, some focus on disability as a barrier to economic activity, rather than the extent to which day to day activities are limited, or the kind of care needed. About 37,000 people in Lambeth say their day-to-day activities are limited by a long term illness or disability, about 17,000 limited a lot, and 20,000 limited a little. About 60% of people with a limiting health condition are aged over 50. About 12% of residents aged 50-64 have a limiting health condition, as do 27% of 64-74s, 46% of 75-84s and 64% of over 85s. 7% of adults classify themselves as having a long term limiting illness or infirmity, and 5% say they have a disability. Projections from by the Department of Health, projecting data from the Health Survey for England to a borough level suggests that there are 19,000 working age residents who have a moderate or severe physical disability in the borough, and 37,600 who have a common mental disorder.

Figure 8: predicted numbers of disabled people (2015)



Source: [PANSI, Department of Health](#)

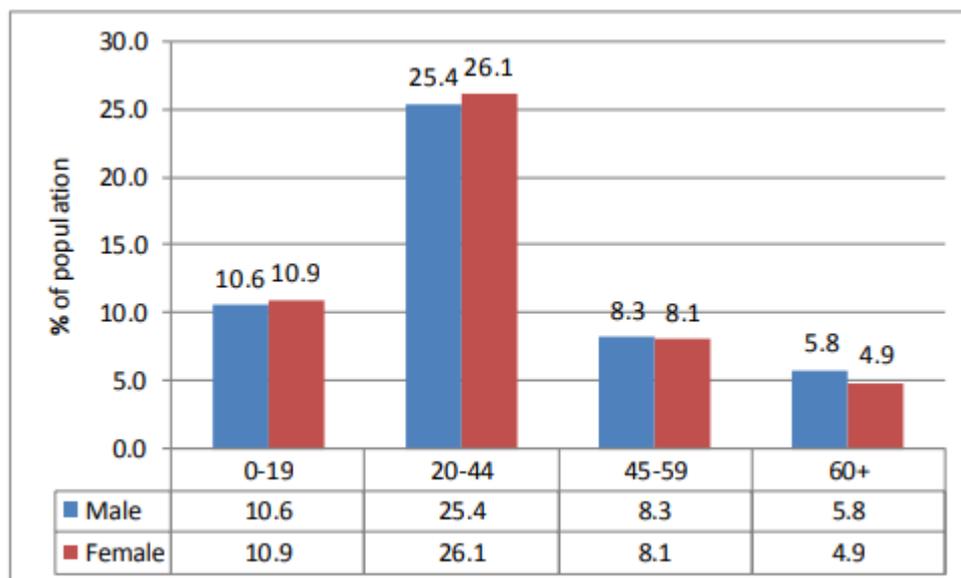
Potential issues for people with disabilities

- 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).

Gender

5C5.15 There are roughly equal numbers of male and female residents in Lambeth – around 157,000 of each. The age profiles are similar: Just under 22% of the population are under 20; 52% are young working age (20-44); 16% are older working age (45-59) and 11% are aged 60+ (SOB 2016).

Figure 9: Population by gender and age



(SOB 2016)

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.

Pregnancy and maternity

5C5.16 There have been between 4,000 and 5,000 births in Lambeth every year in recent decades – in 2013- 14 there were 4,571. Between 2003 and 2013 births reduced by around 0.4% a year, from 4,800 to 4,600. There are an estimated 6,000 to 9,000 Lambeth residents currently pregnant or on maternity leave at any one time. There are differing trends in births by mother’s country of birth. Births to UK-born mothers make up the largest proportion of births in Lambeth – just under half. There is was an average yearly decrease of -1.3%, and the proportion of births decreased from 49.0% in 2003 to 44.4% in 2013. Births to mothers who are from Africa make up around a fifth of all births, and have decreased by around 1% between 2003 and 2013. Births to mothers who are from the Americas, the Caribbean, Antarctica and Oceania decreased from 627 in 2003 to 563 in 2013, (from 13% of all births to 12.2%) average yearly decrease of -1.0%. Births to mothers who are EU born (excl. new EU) increased from 362 in 2003 to 418 in 2013, an increase from 7.5% of all births to 9.1%) This was an average yearly increase of 1.5% (SOB 2016).

5C5.17 The largest rate of growth is of births to mothers who are from the new EU17 countries. Amongst this group, the number of births increased from 1.7% of all births

to 6.2% from 2003-2013. This is an average increase of 25% per year, although from low numbers - from 82 births to 288 in 2013. Births to mothers who are from non-EU Europe increased from 78 in 2003 to 90 in 2013, (increase from 1.6% of all births to 1.9%). This an average yearly increase of 1.5%. Births to mothers who are from Asia and Middle East¹⁸ increased from 274 in 2003 to 286 in 2013, (increase from 5.7% of all births to 6.2%). This an average yearly increase of 0.4% (SOB 2016).

Sexual orientation and gender identity

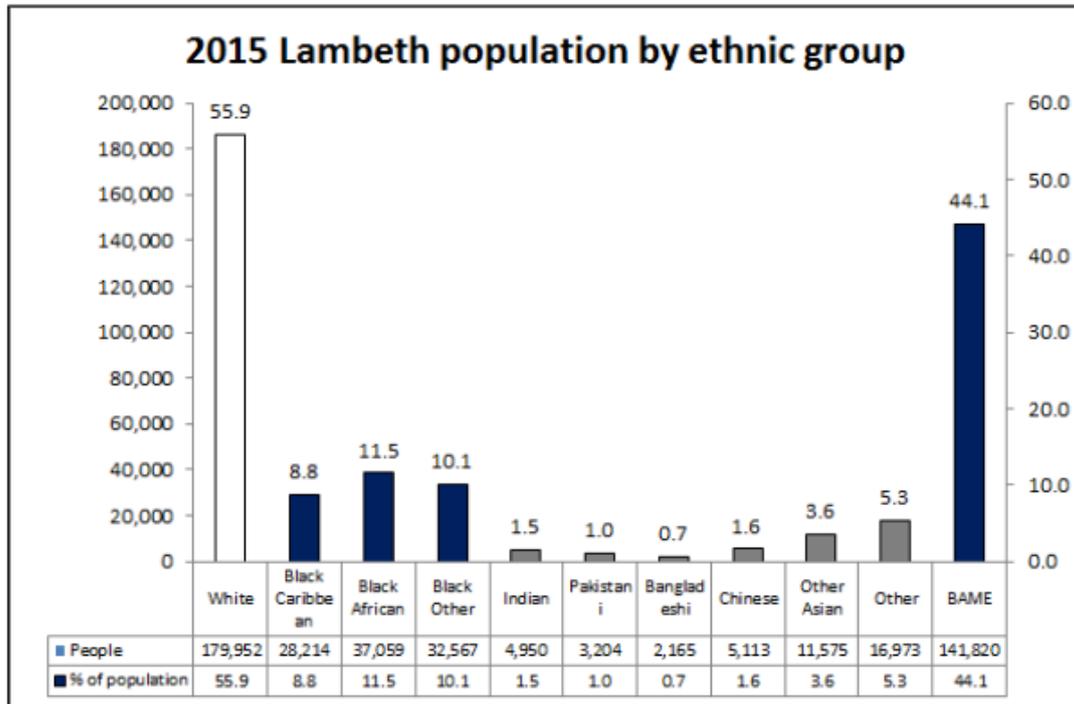
5C5.18 Regional data suggests that around 3.5% of people in London are Lesbian, Gay, Bisexual and Transgender (LGBT). Recent health estimates suggest that Lambeth has one of the largest populations of gay men in the UK. 4% of respondents to the Lambeth Residents' Survey identified themselves as lesbian, gay or bisexual. This level has remained constant since first being asked in 2007, although this is likely to be an under representation. It has been estimated that there are 20 transgender people per 100,000 people in UK, which suggests roughly 50-60 people in Lambeth. There is not much local data - of 24,800 Lambeth tenants, 28 (0.1%) are transgender (SOB 2016).

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 and town centres at night is often an issue.
- Vauxhall in particular, has a high concentration of night time entertainment venues which cater to LGBT communities.

Ethnicity

5C5.19 Around 40% of Lambeth's population is white with a UK background. White people make up 55% of the population. Around 40% of Lambeth residents are White British or Irish, in line with inner London (43%). 15% of the population are from other white backgrounds – around 47,000 people. About two thirds of these people are from Europe outside UK & Ireland. 8% are from Central and South America, 4% from North America and the Caribbean, and 8% from Australasia. Black people make up around a third of the population (30.4%). Lambeth's largest non-white ethnic group is black African (11.5%), followed by black Caribbean (8.8%). Lambeth has the joint second highest proportion of black Caribbean people in London after Lewisham (10.7%) and Croydon (8.8%). Lambeth has a small Asian population compared to many places in London. Only 8.4% of Lambeth residents are from Asian backgrounds (including Chinese), much less than the inner London Average (21%). One a measure of diversity, Lambeth is the 11th most diverse borough in the country (SOB 2016).



Potential issues affecting race / ethnicity

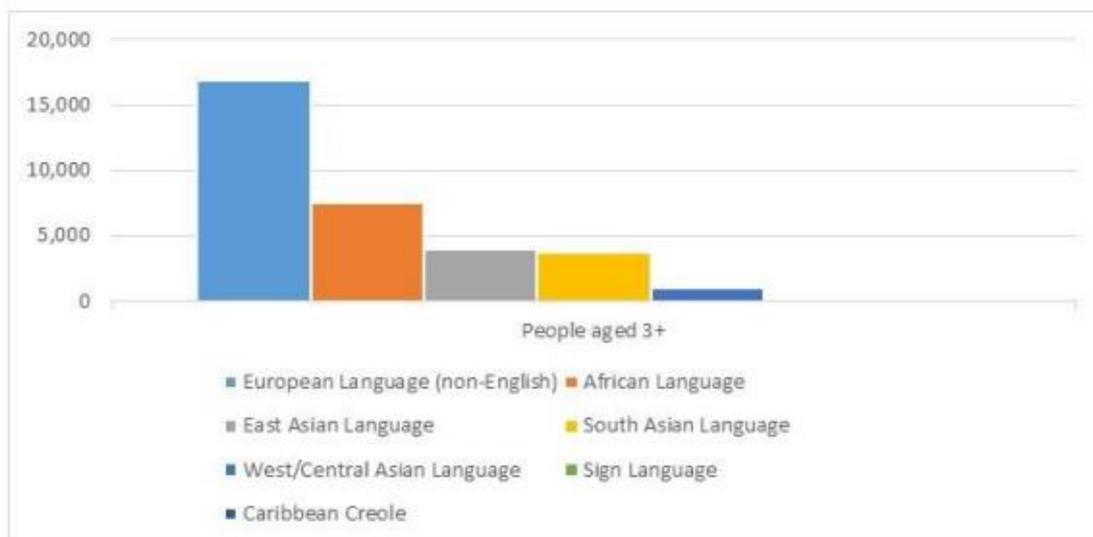
- Accessing suitable affordable housing can be problematic.
- Fear of crime, racial abuse and discrimination can prevent the enjoyment of the public realm and accessing open space.
- Employment opportunities including affordable premises for small businesses and shops.
- Recently arrived communities can be more vulnerable to social isolation.

(SOB 2016)

Language

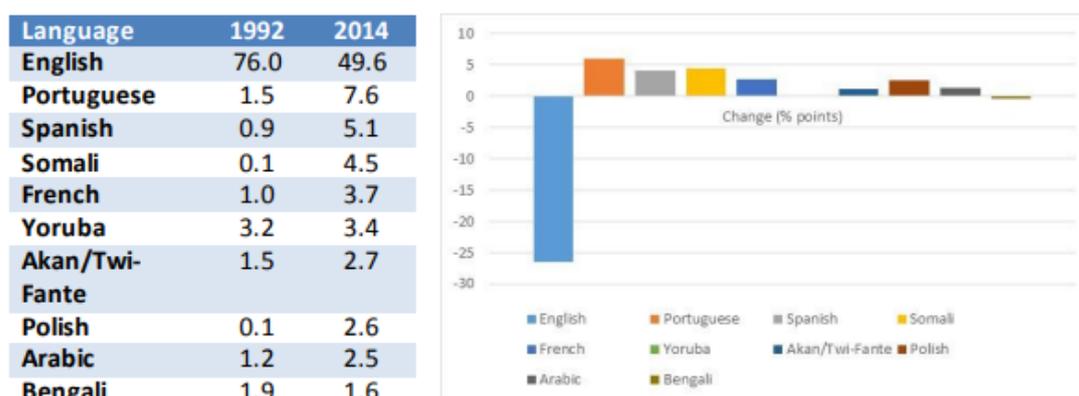
5C5.20 Around 150 different languages are spoken families in the borough. Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages (SOB 2016).

Figure 10: Language groups



5C5.21 The most common main languages after English spoken by pupils in Lambeth schools being Portuguese (7% of pupils), Spanish (5%), Somali (4.5%), French (3.7%), Yoruba (3.4%), Akan /Twi/Fante (2.7%), Polish (2.6%), Arabic (2.5%) and Bengali (1.6%). There has been a significant increase in non-English main languages in the last twenty years (SOB 2016).

Figure 11: main languages spoken by all Lambeth pupils (%)



(SOB 2016)

Religion

5C5.22 Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents by religion, which have differing ethnic profiles. In broad terms, Lambeth’s Christian population is about 34% white British, 18% other white, 15% black African and 13% black Caribbean. The Muslim population is about 31% Asian, 33% black African and 10% other ethnic group. Over a quarter of residents have no religion. These are overwhelmingly white British (60%), white other (15%), and 9% of mixed ethnic groups. In recent years, the percentage of Christians has decreased by around 1.8 percentage points per year, whilst the percentage of people with no religion has increased by almost three percentage points per year. The percentage of Muslims, Buddhist, Jews, Hindus and Sikhs has remained largely the same (SOB 2016).

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.

Socio-economic status, affluence, poverty and deprivation

5C5.23 Like many London boroughs, Lambeth has areas of affluence and areas of poverty, although it is not amongst the poorest boroughs in London. None of Lambeth’s twenty-one wards is in the 10% poorest in London and Clapham Common ward is in the 10% most affluent. Although the borough as a whole is becoming less deprived, there is a persistent pool of economically inactive people with little mobility and this group tends to experience high levels of social exclusion and poor education,

employment and health outcomes (SOB 2016).

- 5C5.24 Measuring poverty as having a household income below 60% of the median income, there are an estimated 49,000 people in poverty in Lambeth before housing costs, and 87,000 people in poverty after housing costs. A third of working age people and a quarter of people of retirement age in Lambeth are living in poverty. Around a fifth of employed residents are paid below the London Living Wage. The 2015 London Poverty Profile, produced by Trust for London and New Policy Institute, estimates poverty at borough by aggregating 14 scores. Lambeth, overall, is in the 16 least impoverished boroughs.
- 5C5.25 The latest deprivation data is the 2015 Index of Multiple Deprivation (IMD). IMD 2015 places Lambeth as the 8th most deprived borough in London and 22nd most deprived in England. This is an improved relative position since 2010 when Lambeth was ranked as the 14th most deprived authority in England. A place is deprived if it has some or all of the following characteristics:
- A high proportion of the population in an area experiencing deprivation relating to low income;
 - A high proportion of the working age population in an area involuntarily excluded from the labour market.
 - A high proportion of children have not achieved educationally and a high proportion of adults do not have skills and qualifications.
 - A high proportion are at risk of premature death and the impairment of quality of life through poor health.
 - A high proportion of the population are at risk of personal and material victimisation at local level.
 - Significant physical and financial barriers to accessing housing and local services.
 - A low quality local environment.

Lambeth is among the 10% most deprived authorities in England (out of 326 districts) on three deprivation scores: the headline figure rank of average rank, scale of income, and exclusion from the labour market (SOB 2016).

- 5C5.26 Deprivation data is available for small areas called Lower Super Output Areas (LSOAs) . 13 of Lambeth's 178 LSOAs are in the 10% most deprived LSOAs in England – five of these areas were in the 10% most deprived in 2010. The table below describes where these LSOAs are located in Lambeth, with the LSOA name and code, and ward; the national rank, where 1 is the most deprived; and whether this LSOA was in the 10% most deprived five years ago.

Figure 12: Deprived areas in the borough

LSOA & Ward	In 10% most deprived in 2010?	IMD Rank. 1 is most deprived	Area
E01003087 Lambeth 031E Knight's Hill	Yes	1,596	Area at the junction of Crown Lane and Knights Hill, including Holderness and Portobello Estates
E01003052 Lambeth 016C Coldharbour	Yes	2,250	Moorlands Estate
E01003045 Lambeth 011A Coldharbour	Yes	2,450	Area east of Brixton Road between Loughborough Road and Villa Road, which includes the Angel Town Estate
E01003048 Lambeth 009B Coldharbour	No	2,491	Loughborough and Hertford estates
E01003051 Lambeth 018C Coldharbour	Yes	2,516	Area at the junction of Shakespeare Road and Coldharbour Lane
E01003075 Lambeth 009C Herne Hill	No	2,718	Thorlands and Lilford estates
E01003184 Lambeth 007B Vassall	Yes	2,785	Cowley Estate
E01003070 Lambeth 033E Gipsy Hill	No	2,790	Area east of Gipsy Hill, including Becondale, Berridge and Charters Close estates.
E01033207 Lambeth 004F Oval	No	2,943	Area south of Vauxhall Bus Station including Vauxhall Park, Fentiman Road and Wywill Road.
E01003188 Lambeth 009E Vassall	No	3,018	Myatts fields South estate
E01003060 Lambeth 011E Ferndale	No	3,064	Area near Stockwell Park Road including part of Stockwell Park Estate
E01003047 Lambeth 011B Coldharbour	No	3,074	Area of Central Brixton between Brixton Road and Coldharbour Lane as far north as Villa Road, including Canterbury Gardens
E01003065 Lambeth 031A Gipsy Hill	No	3,249	Area between St Louis Road and Carnac Street, including Vincennes and Clive Road flats.

(SOB 2016)

5C2.27 13 of Lambeth's 178 LSOAs are in the 10% most deprived nationally, 7%. In 2010, 8 LSOAs were in the 10% most deprived. Almost half (85/ 178, 48%) are in the second and third deciles, and 147/ 178 (80%) are in deciles 2-5. Coldharbour is the most deprived ward by some way, with half of its LSOAs in the 10% most deprived. 10/13 of the most deprived areas are concentrated in the centre of the borough, mostly Brixton, with 3/13 in Norwood. Even the most affluent wards have a range of deprivation, all including the 2nd decile (SOB 2016).

Figure 13: Deprivation by ward

No of LSOAs	National decile of deprivation IMD									Total
	i.e. 1 st decile = 10% most deprived									
Ward	1	2	3	4	5	6	7	8	9	
Bishops			4		1	1				6
Princes		3	2	1	1	1				8
Oval	1	1	4	2		1				9
Larkhall		3	4	2						9
Stockwell		5	2	2						9
Vassall	2	3	3	1						9
Brixton Hill		2	1	2	3					8
Coldharbour	5	3	1	1						10
Ferndale	1	4		2	2					9
Herne Hill	1		1	3	2		1			8
Tulse Hill		4	3	1	1					9
Clapham Common		1		2	1	3	1			8
Clapham Town		2	3	1	1	1	1			9
Thornton		3			2	2			1	8
St Leonard's		1	1	5	1					8
Streatham Hill		2	2	1	3			1		9
Streatham Hill		1	4	1	4					10
Streatham Wells		1	1	1	1	3				7
Gipsy Hill	2	3	1	1	1		1			9
Knight's Hill	1	3	1		4					9
Thurlow Park		1	1	3			2			7
Lambeth	13	46	39	32	28	12	6	1	1	178
%of LSOAs	7	26	22	18	16	7	3	0.6	0.6	

(SOB 2016)

5C5.28 There are several domains measured in the indices of deprivation (see Figure 14 next page).

Figure 14: Indices of deprivation

Domain	Description	Most deprived wards
Income Deprivation	The Income Deprivation Domain measures the proportion of the population in an area experiencing deprivation relating to low income.	Coldharbour, Gipsy Hill, Vassall & Tulse Hill
Employment deprivation	The Employment Deprivation Domain measures the proportion of the working age population in an area involuntarily excluded from the labour market.	Gipsy Hill, Vassall, Coldharbour, Herne Hill, Knights' Hill
Education, Skills and Training	The Education, Skills and Training Domain measures the lack of attainment and skills in the local population. The indicators fall into two sub-domains: one relating to children and young people and one relating to adults.	Herne Hill. Lambeth is not very deprived on this measure
Health deprivation and disability	The Health Deprivation and Disability Domain measures the risk of premature death and the impairment of quality of life through poor health.	Clapham Town, Oval, Larkhall, Vassall, and Knights Hill
Crime	The Crime Domain measures the risk of personal and material victimisation at local level.	All of Lambeth is highly deprived compared to national levels. Vassall, Larkhall and Clapham town are most deprived.
Barriers to housing and services	The Barriers to Housing and Services Domain measures the physical and financial accessibility of housing and local services.	Coldharbour, Tulse Hill, Larkhall
Living Environment	The Living Environment Domain measures the quality of the local environment.	Oval, Larkhall, Stockwell, Streatham Hill
Income Deprivation Affecting Children	The Income Deprivation Affecting Children Index (IDACI) measures the proportion of all children aged 0 to 15 living in income deprived families.	Coldharbour, Larkhall
Income Deprivation Affecting Older People	The Income Deprivation Affecting Older People Index (IDAOPI) measures the proportion of all those aged 60 or over who experience income deprivation.	Coldharbour, Larkhall, Vassall

Health

5C5.29 Health issues in Lambeth reflect its position as an inner-city urban area with a young population profile and a mix of deprivation and affluence. Lambeth fares comparatively worse for health inequalities when compared to national rates. The burden of ill-health results from lifestyle issues as well as resulting diseases and/or long-term conditions such as heart disease and cancer. Life expectancy in Lambeth is improving and the life expectancy for women is slightly above the national average at 83 years, but male life expectancy is around a year lower than the national average at 78.5 years. Both male and female life expectancy is lower than national averages. (Lambeth Health Profile 2017) However, in some of the most deprived wards in Lambeth, life expectancy is 5.6 and 3.8 lower for men and women respectively when compared with the borough's least deprived areas (Lambeth Health Profile 2017). This reflects the significant adverse effect of poverty and deprivation on health. The gap in life expectancy is due to an excess of death from chronic obstructive airways disease, cancer (especially lung cancer), circulatory disease, infectious disease, coronary heart disease and stroke in the more deprived parts of the borough (SOB report 2016).

5C5.30 Life expectancy at birth, at ward level varies between 77.4 years (Clapham Town)

and 84.8 years (Thornton). Most wards have a life expectancy similar to Lambeth with the exceptions highlighted in Figure 15 below.

Figure 15: Life expectancy at ward level

Life Expectancy	Compared to Lambeth	Compared to London	Compared to England
Lower	Brixton Hill, Knights Hill, Larkhall, Clapham Town	Gipsy Hill, Oval, Streatham Wells, Streatham Hill, Brixton Hill, Knights Hill, Larkhall, Clapham Town	Streatham Wells, Streatham Hill, Brixton Hill, Knights Hill, Larkhall, Clapham Town
Higher	Thornton, Streatham South, St Leonards, Thurlow Park	Thornton	Thornton, Streatham South

(SOB 2016)

- 5C5.31 Conditions that contribute to Lambeth’s lower (when compared against England) life expectancy include circulatory diseases such as coronary heart disease and stroke; cancer, especially lung cancer; respiratory diseases such as chronic obstructive pulmonary disease; digestive diseases such as cirrhosis of the liver; external causes such as suicide and violence; infectious and parasitic diseases, and mental health and behavioural disorders (SOB report 2016).
- 5C5.32 Coronary heart disease, hypertension, diabetes, chronic obstructive pulmonary disease, cancer and severe mental illnesses are the major long-term conditions having an impact on the health of the population in Lambeth. The top three causes of death amongst Lambeth residents are coronary heart disease, cancer and respiratory diseases (JSNA 2012). Lambeth has one of the highest incidences of mental health need in London as estimated by the Mental Illness Needs Index.
- 5C5.33 Unhealthy lifestyles such as smoking, alcohol and drug misuse are high compared to London and England, increasing the risk of serious illness. Approximately 20 per cent of the population in Lambeth is reported to be high-risk drinkers, similar to the national figure. Levels of teenage conceptions and sexually transmitted infections are also high. Obesity is a growing problem among children and young people in the borough (JSNA 2012).
- 5C5.34 Over 85% of people in Lambeth say they are in good or very good health. There are around 14,000 people who are in bad or very bad health, just under 5% of the population. This pattern is typical of London boroughs. Approximately one in four Lambeth households has someone with a long-term health problem or disability, which is similar to London. About 6% of Lambeth residents have their day-to-day activities limited a lot by a long-term health problem or disability (18,600 people), and another 6.6% (20,000 people) are limited a little. Around 20,500 people provide unpaid care to someone else, just under 7%. This is one of the lowest rates of provision of unpaid care in London (SOB 2016).
- 5C5.35 The ‘Better Health for London’ programme sets out ten ambitions to improve the health of Londoners and reduce health inequalities – it targets the threats posed by tobacco, alcohol, obesity, lack of exercise and pollution. On these outcomes Lambeth

has a mixed public health picture, being amongst the worst boroughs in London on several indicators (see figure below).

Figure 16 Better Health for London outcomes

Better Health for London key outcomes	Lambeth	Lambeth Rank / 33 London boroughs (Rank 1 worse / higher outcome)	London	Comparison with London
School Readiness: The percentage of children achieving a good level of development at the end of reception (2013/14)	55.8%	4 th	62.2%	Worse
Excess weight in 10-11 year olds (2014/15)	41.8%	3 rd	37.2%	Worse
Percentage of physically inactive adults (2014)	20.3%	30 th	27.0%	Better
Excess weight in adults (2012-14)	49.6%	30 th	58.4%	Better
The percentage of working days lost to sickness absence (2010/12)	0.9%	29 th	1.3%	Similar
Smoking prevalence (2014)	18.1%	13 th	17.0%	Similar
Admission episodes for alcohol related conditions / 100,000 (2013/14)	625.9	5 th	541.2	Worse
% of people on register with severe mental illness known to GPs (2013/14)	1.26%	9 th	1.05%	Higher
Proportion of people who are feeling supported to manage their condition (2014/15)	59.4%	14 th	59.7%	Similar
Mortality rate from causes considered preventable / 100,000 (2012/14)	205	5 th	169.5	Worse than London

- 5C5.36 There are a growing number of people with learning disabilities living in the borough. The proportions of people with mental health problems and with physical disabilities and older people helped to live at home are increasing. One-third of those aged 65+ is estimated to live alone. 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.
- 5C5.37 Lambeth has a relatively high birth rate in comparison to national averages, but has a lower rate than other inner London authorities and the rate has been reducing over the past four years after years of growth since 2001 (ONS, 2017). The infant mortality rate (death in babies under 1 year) has decreased steadily in Lambeth and is currently 4.1 deaths per 1,000 live births, which is broadly in line with the London and national averages.
- 5C5.38 The Lambeth Clinical Commissioning Group (CCG), a group of 44 GP practices in the borough, work with the Council and pharmacies, dentists, hospitals and mental health providers, to commission NHS services for residents. The Lambeth Public Health Directorate now sits within the Council. *Lambeth Healthcare Infrastructure Analysis* undertaken by the London Healthy Urban Development Unit in July 2018 for the Lambeth CCG, sets out the future need for GP space by each CLIP area and CCG Locality in Lambeth. It identifies a shortfall of 16 GP clinical rooms by 2028

across the borough, with a shortfall identified in the north of the borough and in Streatham.

Likely evolution without the draft revised Plan

- 5C5.39 The London Plan provides good provision of policies for ensuring equal opportunities and social cohesion; however the local context that the Draft Revised Lambeth Local Plan October 2018 offers, in particular on improving job prospects for the young and/or unemployed residents, delivery of affordable housing, housing standards, access to infrastructure, delivering mixed and balanced communities and improving environmental conditions for Lambeth's deprived areas and deprived communities, including regeneration may be lost in the absence of an up-to-date Local Plan for Lambeth. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of Draft Revised Lambeth Local Plan October 2018 policies

- 5C5.40 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 5, Equalities. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

- 5C5.41 The following draft policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	S13 - Schools
D2 – Presumption in favour of sustainable development	T1 – Sustainable travel
D3 – Infrastructure	T2 – Walking
D4 – Planning obligations	T3 – Cycling
H1 – Maximising housing delivery	T4 – Public transport infrastructure
H2 – Delivering affordable housing	T5 – River transport
H3 – Safeguarding existing housing	T7 – Parking
H4 – Housing mix in new developments	T8 – Mini-cabs, taxis and private hire vehicles
H5 – Housing standards	EN1 – Open space/Green Infrastructure/Biodiversity
H6 – House conversions	EN2 – Local food growing and production
H7 – Student housing	EN3 – Low carbon and renewable energy
H8 – Housing to meet specific community needs	EN4 – Sustainable design and construction
H9 – Hostels and houses in multiple occupation	EN5 – Flood risk
H10 – Gypsy and Traveller needs	Q1 – Inclusive environments
H11 – Estate regeneration	Q3 – Safety/crime prevention
H12 – Build to rent	Q4 – Public art
H13 – Shared living	Q6 – Urban design – public realm
ED1 – Offices (B1a)	Q13 – Cycle storage
ED2 – Affordable workspace	Q16 – Shop fronts and signage
ED3 – KIBAs	PN1 – Waterloo
ED4 – Non-designated industrial sites	PN2 – Vauxhall
ED7 – Town centres	PN3 – Brixton
ED8 – Evening economy and food and drink uses	PN4 – Streatham
ED10 – A2 uses	PN5 – Clapham
ED11 – Local centres	PN6 – Stockwell
ED15 - Employment and training	PN7 – West Norwood
S11 – Safeguarding existing social infrastructure	PN8 – Kennington / Oval
S12 – New or improved social infrastructure	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and monitoring policies D1 – D4

5C5.42 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.

Housing policies H1 – H13

5C5.43 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; local plan housing provision will likely benefit all equalities groups, particularly those on low income levels and those requiring specialist housing through providing greater housing choice, tenures and availability. An increase in the availability and diversity of housing is likely to contribute to a reduction in overcrowding, which often occurs in less advantaged communities, particularly BME communities, and where renting dominates housing ownership, as it does in Lambeth. It is considered that policy H2 – affordable housing provides for a range of different income levels, from low cost rented housing (social rent/London affordable rent) and intermediate provision. 70% of new affordable housing should be low cost rented homes allocated to need in line with the council's allocation scheme and for Londoners on low incomes (social rent/London affordable rent). This will benefit the lowest income groups of the borough. 30% should be intermediate products including London Living Rent and London Shared Ownership. The viability assessment of the Draft Revised Lambeth Local Plan October 2018 has been tested on the assumption that all intermediate affordable housing will be provided for a household income not exceeding £60,000 per annum. Where shared ownership is proposed as an intermediate product, the council may cap the maximum household income of purchasers at £60,000 per annum to ensure it meets local housing need, particularly in the north of the borough. This should result in availability of more genuinely affordable housing for existing Lambeth residents, and significantly positive effects for the achievement of SA objective 5.

5C5.44 Affordable housing should be provided on-site and be equivalent in appearance and layout to other housing on-site, and therefore should result in more equitable outcomes and feelings of social cohesion. However, if this is not feasible, policy states that off-site provision or even a payment in lieu may be permissible. Offsite provision would need to be in the borough and as near as possible to the principal site; no further than one mile away. A distance of 1 mile can result in a very different neighbourhood and environment. In the exceptional circumstances that this off-site provision is considered, it needs to be demonstrated that the alternative site secures a more mixed and balanced community, secures a higher level of affordable housing than could be secured on-site, and addresses priority needs more effectively, especially for affordable family housing tenure and house type. Taking land values and viability considerations into account, the policy needs to allow some flexibility in the location and provision of affordable housing – and the expectation is that it is provided onsite. The council must be satisfied offsite provision is as close to the

principal site as possible for the most equitable outcomes for occupiers of affordable housing. Payments in lieu can also contribute to wider programmes of affordable housing delivery, which may result in positive effects.

- 5C5.45 The council will apply London Plan policy H10 B where loss of existing affordable housing is proposed. Such loss will not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, and generally should produce an uplift in affordable housing provision. All schemes are required to follow the viability tested route. Again, this approach should result in significant positive effects for lower income groups.
- 5C5.46 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)), or the proposal is for specialist non-self-contained accommodation to meet an identified local need, or hostels or HMOs (benefiting more vulnerable groups in Lambeth). To ensure mixed and balanced communities, a range of dwelling types, sizes and tenure is required. Children's play areas will be required in new developments expected to have ten or more children and should normally be made on-site and policy H5 also ensures all dwellings regardless tenure have access to external amenity space. New housing must conform to building control standards (includes 'wheelchair users dwellings' and 'accessible and adaptable dwellings'), and policy H5 together with EN4, will help to reduce issues such as homelessness, overcrowding and the risk of ill-health from damp or mould. Policy H8 makes provision of housing to meet specific community needs, benefits the more vulnerable groups of society (for example older persons, those with significant mental or physical health limitations), enabling Lambeth residents to remain in the borough.
- 5C5.47 While the Local Plan makes provision for student housing; the priority use of land is meeting conventional housing and employment needs and the achievement of mixed and balanced communities. 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. Supporting text states the ability to accommodate disabled students should be fully integrated into any student housing development. There is also provision for affordable student housing (minimum 35% of accommodation), and where leisure facilities are proposed, these should be made available to the public where there is an identified shortage of provision. This should result in positive effects on various equality groups.
- 5C5.48 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. It is considered that these policies contribute positively to achieving SA Objective 5 and the targets set out in Table 4.
- 5C5.49 Policy H11 estate regeneration should result in significant positive effects for lower income Lambeth residents (minimum 50% affordable housing is required and in no circumstances will a net loss of affordable housing, or of social rented housing, be allowed in an estate regeneration scheme). **It is considered that reference should also be made to policy EN4 sustainable design and construction, particularly as section 10 and policy EN1(a)(ii) are mentioned [SA RECOMMENDATION 31].**
- 5C5.50 Build to rent policy H12 should also result in significant positive effects for lower income groups accessing housing. The preference for a separate core/block for low cost rented housing is for equity reasons. Having a registered social provider

managing the separate core allows the council to receive nominations and choose providers that will best address Lambeth need. It is considered this policy seeks to provide genuinely affordable housing for Lambeth residents.

5C5.51 Policy HXX shared living provides a housing option that may be more appealing for young and/or single persons. It might attract those new to London and wanting to meet new people and therefore better enabling them to feel part of a community. It might also attract those no longer able to live in student accommodation, but wishing to stay in central locations. Shared living will only be supported in Waterloo and Vauxhall, and it is considered these locations are appropriate for the intended occupiers, while enabling feasibility to provide affordable housing contributions.

Economic Development policies ED1 - ED4, ED7, ED8, ED10, ED11, ED15

5C5.52 Policies ED1 – ED4 seek to protect and maintain sites and premises in business use and provide affordable workspace thereby maintaining and/or increasing employment opportunities in the borough to help address worklessness and poverty. Provision for affordable workspace and flexible workspace suitable for micro, small and medium enterprises increases availability of workspace for specific social, cultural or economic purposes. This will help benefit start-ups, creative businesses and not for profit and/or charitable organisations supporting Lambeth's creative and digital industries (CDI) economy and providing significant social value. This includes education providers and organisations whose primary purpose is to support disadvantaged groups and tackling economic inequality through CDI related activity. Provision of affordable workspace is particularly important in opening up start-up opportunities to lower-income communities, women and BAME groups. Major redevelopment proposals in town centres will also need to re-provide small 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 equality groups including women and parents in terms of offering a better work and domestic life balance.

5C5.53 Policy ED6 also 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. Encouraging new residential development on appropriate sites in town centres and residential above ground level also reduces the need to travel, increases accessibility to fresh, local and cultural food, and promotes social cohesion and therefore works to benefit equality groups provided these are available on affordable terms. Policy ED11 will have similar positive impacts on equality groups as it seeks to have day-to-day local retail uses such as newsagents, chemists, grocers and bakers within walking distance of home, thereby providing increased accessibility for low income groups, the elderly and people with mobility difficulties. The protection of existing indoor and street markets in the borough (policy ED12) provides continued opportunity for access to cheap, fresh and healthy food; supports market holders; and will likely result in positive outcomes for various equality groups.

5C5.54 Policy ED8 includes a clause 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. compared against other age groups); it is considered that the wider benefits to children and society generally outweigh any perceived unfairness. Proposals for drive-through takeaways

are not supported in any location, which helps in part to improve health outcomes, with potential to reduce obesity levels and improvements in air quality. The policy prevents stopping up of public highway to provide outdoor seating areas for food and drink uses, thereby benefiting a number of equality groups (such as elderly, disabled, and parents with prams) through appropriate accessibility.

- 5C5.55 Policy ED10 aims to manage over-concentration of A2 uses, betting shops and payday loan shops. While some may consider this has a negative impact on low income groups (such as reduced selection of choice and opportunity) it may also equally result in positive effects on this group by reducing opportunities to spend money / get into debt (i.e. betting shops).
- 5C5.56 It is considered that policy ED15 should result in significant 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. Financial contributions will be sought from major developments to help support those sections of the Lambeth workforce that are furthest from employment, having been out of work for a long period of time and/or having low levels of skills. 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. The policy is likely to benefit young people, the unemployed and lower income communities in particular, who may have more limited access to education and employment opportunities. It should also help women and caregivers in providing localised employment which can assist in maintaining or improving a better work/life domestic balance.

Social infrastructure policies S1 and S2

- 5C5.57 Policies S1 and S2 support the provision of social infrastructure which should impact positively on poorer communities and on equality groups. Proposals for more than 25 residential units should include appropriate provision of social infrastructure to meet the additional need that will arise, where this cannot be met adequately through existing facilities. New social infrastructure should be made available to all residents irrespective of tenure. Similarly, proposals of 500 residential units should incorporate suitable childcare provision to meet additional need that cannot be met by existing facilities. New sports and leisure facilities provided within hotels and purpose-built student housing or shared living should be made available for community access during off-peak hours to groups of Lambeth residents and users identified by the council. **To maximise positive effects on all groups in the local area, it is considered that all new social infrastructure provision should be made available to all residents of the local area, rather than just those of the new development or those identified by the council. It is recommended the policy team consider this further [SA RECOMMENDATION 32].**

Transport policies T1 – T6, T8

- 5C5.58 Transport policies T1 – T4 promote sustainable travel, including walking, cycling and use of accessible public transport. Policies seek to improve access to public transport, improve walking and cycling routes 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 this regard as well. In so far as

planning policy is able; it is considered the public transport policies 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 areas of employment opportunity. There is a funding gap for the new station at Brixton and/or Loughborough Junction connecting to the London Overground, and a funding gap on refurbishments to provide step-free access and a safer and improved user experience at Brixton Rail Station so effects on equality groups and the wider population of Brixton are less likely to be maximised. Similarly there is a current funding gap on improving step-free access at Streatham Station and Tulse Hill Station. 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. 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. Clause (e) policy T2 on walking states that the council is committed to ensuring that the physical environment in Lambeth, including all our streets, is fully accessible to all. Provision for pedestrians should therefore be inclusive and prioritise those with particular mobility needs. This is commended and should result in more positive effects for those equality groups with accessibility needs. **Clarification is sought on whether policy T2 applies to shared use of road space/public realm between pedestrians and vehicles as this shared use of space can be problematic for disabled users, elderly and young children/parents [SA RECOMMENDATION 33].**

5C5.59 Disabled persons parking for new residential developments is set out in London Plan policy 6.1. For non-residential developments disabled persons parking should be provided for 5 per cent of the workforce, including where no general parking is provided. Provision of car clubs (aim is for a car club space within 400m of each other) should 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. For those groups that require it, the Draft Revised Lambeth Local Plan October 2018 makes provision of mini-cabs, taxis and private hire vehicles which will help address accessibility and safe travel.

Environment policies EN1 - EN5

5C5.60 Policy EN1 seeks to protect existing open spaces, and increase the quantity of open space through proposals including within new development, and contributing to creation of green corridors. Major development in areas of open space deficiency or access to nature deficiency will need to provide on-site provision (or make financial contribution), although it is uncertain whether the policy will directly benefit equality groups living in areas of open space deficiency (outside of new developments). Protection of existing open space and green infrastructure and increasing quantity of open space and green infrastructure in the borough helps 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). Evidence suggests certain population groups are more likely to benefit, for example:

- Children: A greater quantity or proximity of natural spaces around the home or school is significantly related to improved cognitive performance and reduced incidence of behavioural issues. Evidence suggests that use of green space by children is a lifetime determinant of future use.

- Older people: Older people, especially over 75 years old, or those living on their own who are socially isolated, or in a care home are at greater risk of heatstroke. Planting trees and vegetation and the creation of green spaces to enhance evaporation and shading can make the environment cooler and reduce this risk.
- Lower socio-economic groups: The benefits of green space are greatest for people from lower socio-economic groups. Living environments with a greater amount of green spaces are associated with reduced likelihood of depression and anxiety amongst those from this group.
- People in confined circumstances e.g. care homes, hospitals, prisons: Evidence in the literature shows that among other benefits, viewing nature is positive for health in terms of recovering from stress, improving concentration and productivity, and improving psychological state.

The policy also safeguards cemeteries and burial space in the borough, which will benefit particular faith groups.

5C5.61 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. Incorporation of community gardens, allotments, orchards are encouraged in major developments (not limited to residential) and therefore can benefit, for example, faith, disabled, young and older persons groups that use buildings or land in D1 or D2 use class.

5C5.62 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. The council will apply London Plan policies for improving air quality and managing heat risk, both of which acknowledge the adverse effects that can be experienced by the more vulnerable members of society (for example very young, elderly, those with pre-existing health conditions).

5C5.63 **Quality of built environment policies Q1, Q3, Q4, Q6, Q13, Q16**
Policy Q1 inclusive environments is considered a key policy for achieving SA objective 5 and is likely to result in significant positive impacts for disabled people, older people, other people with mobility constraints and children. It should be noted the Draft London Plan also places a significant emphasis on inclusive environments. **The policy team may wish to clarify that the policy applies to all new development as well as the wider public realm [SA RECOMMENDATION 34].** However, policy Q6 – urban design and public realm seeks to provide a public realm that is improved for all users, particularly through legibility, permeability and convenient access is for all users) and offers positive benefits for equality groups. **As recommended under the appraisal of policy Q6 for SA objective 3, it is further recommended under SA Objective 5 that the policy team consider surface materials used in the public realm and their ease of use for different equality groups [SA RECOMMENDATION 35]. It is also recommended that the policy team is satisfied that policy seeks to ensure safe shared public realm spaces (where pedestrians and vehicles are supposed to use the same road space). The shared use of such space can be problematic for disabled users, elderly and young children/parents/carers [SA RECOMMENDATION 36].**

- 5C5.64 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, LGBT and BME groups (policy Q3).
- 5C5.65 Policy Q4 has potential to result in improved social cohesion/inclusion and reduce feelings of discrimination as it seeks to support, celebrate and reflect Lambeth's diverse communities.
- Places and neighbourhoods policies PN1 – PN11***
- 5C5.66 Waterloo lies to the north of Lambeth's most deprived areas. Policy PN1 should result in positive effects on all equality groups. The policy aims to 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.
- 5C5.67 Policy PN2 for Vauxhall seeks to create new jobs and homes, opportunities for affordable retail, 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 LGBT nightlife venues, the needs of this (particularly addressing homophobic crime) 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 and comply with other local plan policies). Similarly the policy itself makes no mention of the active Portuguese community and their independent specialist food and retail outlets. **The policy team may wish to consider the merits of safeguarding these uses and/or maintaining this local distinctiveness that has regional appeal, as these uses contribute to the distinctive character of Vauxhall, is a development 'hotspot' (opportunity /regeneration area) and therefore could be at risk of being lost [SA RECOMMENDATION 37].**
- 5C5.68 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, together with other Draft Revised Lambeth Local Plan October 2018 policies, seeks to address this in so far as planning policy can influence environmental factors on deprivation levels.
- 5C5.69 Policy PN4 for Streatham should result in positive effects on 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 and C4 use classes as well as C3.
- 5C5.70 Clapham has issues of deprivation and 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.

- 5C5.71 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.
- 5C5.72 Policy PN8 also seeks to support growth in employment and housing while reinforcing and adding to the quality of its existing well-defined character and sense of place and seeking maximum community benefit from development proposals. Policy PN7 for West Norwood seeks to increase the amount and quality retail, workspace, commercial uses, education, community facilities, cultural uses and housing. 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 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. The growth of creative and digital industries in the creative enterprise zone is supported, which may benefit particular equality groups in the local area.
- 5C5.73 Policy PN10 for Loughborough Junction seeks to radically improve the physical environment of this deprived community. The policy seeks to ensure all necessary services are within close walking distance of every home.
- 5C5.74 Policy PN11 for Upper Norwood seeks to improve public transport accessibility in the south of the borough by supporting the extension of the Tramlink to Crystal Palace, and improvements to bus services to central London. Currently, delivery of the Tramlink extension remains uncertain due to funding gaps; however the Local Plan states support for it and should it be delivered would significantly benefit various equality groups. **It is noted that PN11 supports the Tramlink extension, but policy T4 on public transport infrastructure has removed reference to the Tramlink. The policy team may wish to revisit this anomaly [SA RECOMMENDATION 38].**
- 5C5.75 An observation made for all policies (PN1 – PN11) 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. The Plan makes mention of this in the supporting text of policy T2.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

- 5C5.76 Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that the Draft Revised Lambeth Local Plan October 2018 policies will have a significant positive effects on equality groups to the extent that planning policy can facilitate and achieve.

Table 15: Summary assessment of effects of Draft Revised Lambeth Local Plan October 2018 on Equality

Assessment of effects of 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 Revised Lambeth Local Plan October 2018 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 a range of affordable housing products, including genuinely affordable housing for Lambeth residents, energy efficient homes and buildings, improved access to local employment and skills and training schemes, provision of affordable workspace, and improved access to transport and daily amenities.</p> <p>It is also considered that the draft Plan contains good provisions for ensuring community services and facilities are provided and accessible to everyone. The SA recommends that where social infrastructure is provided as part of proposals comprising 25 or more residential units, new hotels, purpose-built student housing and shared living, that the social infrastructure is made available to all residents of the local area rather than just those occupying the development itself, particularly in areas of identified shortage. This will help improve social cohesion, reduce social exclusion and provide provision of social infrastructure in areas of need.</p> <p>It is also recommended that surface materials used in public realm improvements consider the effects on various equality groups, for example some materials can become slippery in wet weather (negative impact for elderly, young, wheelchairs users and buggy users/carers) or are more difficult to move on (for example wheelchair users, buggy pushers). People with visual impairments should also be considered in public realm improvements and surface materials.</p> <p>Perhaps the temporary exception affecting some equality groups involves construction works and development that may cause an element of temporary disruption to those with disabilities.</p>	<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 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.</p>	<p>Permanent</p> <p>Possible temporary disruption to those with disabilities with improvements to public realm/public transport accessibility and effects of construction works of development impacting their accessibility / day-to-day activities.</p>

Recommendations for monitoring likely significant positive and uncertain effects

5C5.77 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Gross affordable housing - % of habitable rooms in major developments (completions and approvals)
- Tenure of new affordable housing (completions and approvals)
- Net additional student bedspaces completed
- Number of specialist older persons housing units completed
- Gypsy and traveller pitches
- Proportion of major application approvals that make provision for Affordable Workspace (in parts of borough covered by policy ED2)
- Number of disabled parking spaces per completed major development
- Infrastructure Delivery Plan updates
- 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.

6. HOUSING

5C6.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 policies against:

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

5C6.2 To achieve objective 6 plan policies should increase access to good housing; promote increased supply of housing; increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure); 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; tackle homelessness and overcrowding; provide housing that ensures a good standard of living and promotes a healthy lifestyle; and provide Lambeth residents with more opportunities for better quality homes.

Relevant Policy Objectives

National Level

5C6.3 Paragraphs 59 to 76 of the *National Planning Policy Framework 2018* contain housing policies applicable to Lambeth borough. They provide policy on significantly boosting the supply of housing; strategic policies should be informed by a local housing need assessment; planning policies should identify a supply of specific deliverable sites for years one to five of the plan period and specific, developable sites or broad locations for growth, for years 6-10; and where possible, for years 11-15 of the plan, including additional buffers. Paragraphs 122 and 123 address achieving appropriate densities, taking account of identified need for different types of housing and optimising use of land to meet as much of the identified need for housing as possible. Applicable to Lambeth borough, paragraph 63 states: 'Provision of affordable housing should not be sought for residential developments that are not major developments...'

Regional Level

5C6.4 The draft *London Plan 2018* contains a raft of housing policies on minimum borough housing annual average targets, delivering affordable housing, housing size mix, ensuring best use of stock, build to rent, supported and specialised accommodation, specialist older persons housing, gypsy and traveller accommodation, purpose-built student accommodation and large scale purpose-built shared living, housing quality and standards, accessible housing, optimising housing density and small sites.

5C6.5 The Mayor of London has produced a *London Housing Strategy* (May 2018) and *London Housing Strategy Implementation Plan* (May 2018). The strategy and implementation plans is structured around five priorities: building homes for Londoners; delivering genuinely affordable homes; high quality homes and inclusive neighbourhoods; a fairer deal for private renters and leaseholders; and tackling homelessness and helping rough sleepers.

5C6.6 The Mayors *Affordable Housing and Viability SPG 2017* focuses on affordable housing and viability. It includes four distinct parts: background and approach; the threshold approach to viability assessments; detailed guidance on viability assessments; and a specific approach to Build to Rent schemes.

Local Level

5C6.7 The *Lambeth Housing Strategy 2017* sets out the priorities for housing in Lambeth for

the next three years. The Strategy focuses on four priority areas: More Homes – providing new homes, available to households on a range of incomes and needs; Better Homes – homes are warm, safe, secure and well-managed across all tenures; Better Services and More Support for Vulnerable Residents – residents with particular support or social care needs are supported with their housing needs; and Integrating Housing with Other Services – develop more innovative and collaborative ways of working with key partners and stakeholders.

- 5C6.8 The *Lambeth Borough Plan 2016 – 2021* sets out three 10 year outcomes for housing: maintain socially mixed communities in Lambeth by building homes of all tenures; prevent homelessness, placing people in suitable, affordable, permanent homes as quickly as possible; and increase the quality of Lambeth's housing.
- Baseline conditions and existing issues**
- 5C6.9 According to Census data, Lambeth's housing stock is typical of inner London, with a large proportion of flats - 73 per cent in total. Around two-thirds of the flats are purpose built and one-third are conversions. A correspondingly small proportion, 27 per cent of the stock are houses (SHMA 2017). Around 67 per cent of households live in rented accommodation (both social and private rented) and 32.5 per cent own their own home, similar to other inner London boroughs. Seventeen per cent of households rented from the council in 2016, down from 29 per cent in 2001. The proportion of private renters increased from 18 per cent to 33 per cent during this period (SHMA 2017).
- 5C6.11 The average house price in Lambeth in July 2017 was £533,312, which is slightly higher than the average for London but more than double the national average (SHMA 2017). The average monthly private rent for a two-bedroom property in Lambeth in January 2017 was £1,447, slightly higher than the average rent in London (SHMA 2017).
- 5C6.12 Average rents in Lambeth equate to 56% of average household income, highlighting that the private rented sector is unaffordable to many residents. Accordingly, the need for affordable housing in Lambeth is high and there are over 23,000 households on the waiting list for affordable housing (Lambeth Housing Strategy, 2017).
- 5C6.13 There are sixteen pitches for gypsies and travellers at the Lonesome Way site in Streatham Vale. Future need for gypsy and traveller accommodation was assessed during 2014 and updated in 2016.
- 5C6.14 Accordingly to Census data there are around 136,000 households in Lambeth. Family households – couples with or without children - make up 29% of Lambeth's households. Lone parents make up 15% of households. Single person households make up 34% and others, such as working age house-sharers, account for 21% of households. Tenure in Lambeth is similar to Inner London – around 65% of households live in rented accommodation, and 33% (43,000 households) own their own home. Just under one in five households (25,000) rent from the council, and around 16% (20,000) rent privately. Over 70% of households in Lambeth live in flats, either purpose built or converted houses. Just over 10% of households live in detached or semi-detached houses (SOB 2016).
- 5C6.15 The lack of supply of the homes that Londoners need has played a significant role in London's housing crisis. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing, and for affordable housing in particular. London needs 66,000 new homes each year, for at least twenty years and evidence suggests that 43,000 of them should be genuinely affordable if the needs of

Londoners are to be met. This supports the Mayor's strategic target of 50 per cent of all new homes being genuinely affordable, which is based on viability evidence. 270,000 homes are in the planning pipeline, but delivery is not keeping pace (draft London Plan 2018). Further, Lambeth children growing up and forming new households—and existing households breaking up into smaller units cause housing need to increase. A mix of housing types and tenures will be required to meet the range of local housing needs (SHMA 2017).

- 5C6.16 Affordable housing need over the plan period comprises backlog need plus newly arising need. The calculations show that, based on households spending 40% of their gross household income on rent, the need for affordable housing over the 20 year plan period is 1,047 net additional homes per year. If households spend 30% of their gross household income on rent, 1,573 affordable homes would be needed per year (SHMA 2017).
- 5C6.17 Analysis indicates that, because of the cost of shared ownership products, intermediate affordable housing products could meet a very small proportion (5%) of total affordable housing need. The analysis shows that the London Living Rent intermediate housing product, introduced recently by the Mayor of London, has the potential to meet the needs of a higher proportion of households in Lambeth: 25% of affordable housing need based on households spending up to 30% of household income on rent, or 35% of housing need if up to 40% of income is spent on rent (SHMA 2017).
- 5C6.18 The private rented sector (PRS) makes up one third of all households in the borough; at the Census 2011 there were 38,133 households in PRS housing. Between 2001 and 2011 the proportion of households in the PRS increased from 20% to 29%. GLA data estimates that Lambeth's PRS stock had reached 31% of the total housing stock by December 2014 (GLA datastore 2014). Judging by the previous rate of growth of the sector, and the fact the market conditions have not changed significantly, it can be estimated that the PRS is likely to have reached 33% of housing stock by 2017, the same percentage as the owner-occupied sector (both owned outright and owned with a mortgage). This translates into an estimated 46,500 homes.
- 5C6.19 Geographically, PRS and owner-occupied housing is more concentrated in the western (around Clapham) and southern wards, and social rented housing is more concentrated in northern and central wards. The proportion of PRS households varies from 44.7% in St Leonard's ward in the south of the borough, to 20.4% in Prince's ward in the north of the borough.

Likely evolution without the Draft Revised Lambeth Local Plan

- 5C6.20 It is considered that the housing information in the Local Plan 2015 is out-of-date with regards to housing target, affordable housing products and viability thresholds, dwelling size mix for affordable housing (to reflect latest evidence of housing need in Lambeth – overall household sizes are going down), affordable housing contributions from student housing proposals, estate regeneration, housing on small sites, build to rent schemes and shared living. The draft London Plan sets a housing delivery target of 15,890 new dwellings to 2028/29, 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, in the right locations.
- 5C6.21 There is an increasing demand for housing and especially affordable and sustainable

housing within the borough. Absence of the Draft Revised Lambeth Local Plan October 2018 would not likely deliver the amount and type of affordable housing needed in the right locations in the borough. Different types and sizes of housing are needed and intervention would be required in order to deliver this. The challenges to meet housing demand (including size, type, tenure) are likely to be exacerbated in the absence of the Draft Revised Lambeth Local Plan October 2018. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of draft Policies

- 5C6.22 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 6, Housing. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.
- 5C6.23 The following policies have been screened as having potential for significant effects on this objective:
- | | |
|---|---|
| D1 – Delivery and monitoring | SI2 – New or improved social infrastructure |
| D2 – Presumption in favour of sustainable development | T7 - Parking |
| D3 – Infrastructure | EN4 – Sustainable design and construction |
| D4 – Planning obligations | Q1 – Inclusive environments |
| H1 – Maximising housing delivery | Q2 – Amenity |
| H2 – Delivering affordable housing | Q9 – Landscaping |
| H3 – Safeguarding existing housing | Q11 – Building alternations and extensions |
| H4 – Housing mix in new developments | Q12 – Refuse / recycling storage |
| H5 – Housing standards | Q13 – Cycle storage |
| H6 – House conversions | Q14 – Development in gardens |
| H7 – Student housing | Q20 – Statutory listed buildings |
| H8 – Housing to meet specific community needs | Q22 – Conservation Areas |
| H9 – Hostels and houses in multiple occupation | Q27 - Basements |
| H10 – Gypsy and Traveller needs | PN1 – Waterloo |
| H11 – Estate regeneration | PN2 – Vauxhall |
| H12 – Build to rent | PN3 – Brixton |
| H13 - Shared living | PN4 – Streatham |
| ED1 – Offices (B1a) | PN5 – Clapham |
| ED3 – KIBAs | PN6 – Stockwell |
| ED4 – Non-designated industrial land | PN7 – West Norwood |
| ED5 – Work-live development | PN8 – Kennington / Oval |
| ED7 – Town centres | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and monitoring policies D1 – D4

- 5C6.24 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 – H13

- 5C6.25 Policy H1 seeks to maximise the supply of additional housing in the borough to meet and exceed London Plan targets. This will include estate renewal and regeneration schemes, optimising potential for housing delivery on all suitable and available brownfield sites 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, which can be uncertain, depending on economic climate and can vary year-on-year. However Lambeth has had a good delivery against its housing target over the last ten years. Total housing delivery has outperformed the London Plan targets by a total of 2053 units since 2008/09 (Housing Annual Position Statement 2018).

- 5C6.26 It is considered that Policy H2 affordable housing should result in significant positive effects in terms of achieving SA objective 6. In particular, significant positive effects should be experienced by low income groups as the policy seeks to offer genuinely affordable housing to Lambeth residents (70 per cent of affordable housing provision to be low cost rented homes and 30 per cent intermediate products: London Living Rent or Shared Ownership). Supporting text paragraph 5.15 sets out the council's commitment in ensuring genuine affordability. It states Lambeth's Tenancy Strategy will be a material consideration in determining planning applications involving affordable housing and that the council may cap the maximum household income of purchasers to £60,000 per annum (rather than standard £90,000 per annum) for shared ownership to ensure genuine affordability for Lambeth residents. It is considered this provides a good range of housing products for a wide range of income groups and increased opportunity for residents to secure an affordable decent home.
- 5C6.27 Policy H2 follows the threshold approach of London Plan policy H6. Para 4.5.2 states: 'This means that schemes meeting or exceeding the threshold without public subsidy, and consistent with the requirements in part C of Policy H6 Threshold approach to applications, are not required to submit viability information. It provides the opportunity to move away from protracted viability debates, create certainty in terms of affordable housing requirements, embed the requirements into land values, and offer a clear incentive for developers to increase affordable housing delivered through the planning system above the level in planning permissions granted in recent years. Schemes that do not meet this threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised and treated transparently' (Draft London Plan 2017). It is considered that delivery of housing can be uncertain (although Lambeth has a good track record) however it is considered that the threshold approach aims to incentivise developers to increase delivery of affordable housing by avoiding submission of viability assessments.
- 5C6.28 Affordable housing should comply with the borough's preferred dwelling size mix (policy H4) which should result in positive effects on the achievement of SA objective 6, particularly provision of a range of homes including family-sized units.
- 5C6.29 Overall it is considered that policy H2 has potential to result in significantly more people in Lambeth having the opportunity for an affordable home. Through the policy, affordable housing targets should be met however; despite Lambeth's current good track record, deliverability of housing completions, and indeed affordable housing completions may be uncertain.
- 5C6.30 Policy H3 safeguarding existing self-contained housing. A loss may only be acceptable where it arises from the amalgamation of smaller separate flats to create a family-sized unit or the proposal is for specialist non-self-contained accommodation (use class C2) to meet an identified local need. It is considered that policy H3 should result in significant positive effects in attaining SA Objective 6, particularly by increasing access to good general needs housing, specialist housing, 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 helps

ensure sufficient housing is provided and will also maximise use of existing infrastructure and minimise resource consumption.

- 5C6.31 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. The expected mix of one-bed, two-bed and 3+-bed units for low cost rented element of affordable housing provision is set out in the policy. Intermediate products and general market housing should provide a balanced mix of unit sizes (including family-sized accommodation) and developments are expected to reflect the preferred dwelling mix set out in clause (a) of the policy. However rigid application of this may not always be appropriate and the policy offers developers a more flexible approach to respond to current needs and demands.
- 5C6.32 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 sets out minimum internal and external space standards. For internal space standards, the local plan defaults to London Plan standards. For external space, Lambeth applies its own borough-wide standards (and this is commended). In terms of maximising range of housing (taking into account different requirements and preferences of size, location, type) it is considered there is very real risk that developers will opt to deliver housing set at the minimum internal space standards. There is no policy incentive to build homes larger than the minimum internal requirements (save for any market demand). Accordingly, there is very real risk that most affordable housing will be built to minimum internal space standards. Accordingly, 'range' of housing size will be dictated only by the number of bedrooms/bedspaces. At the very least, the supporting text could encourage internal space standards in excess of the minimum standards. Minimum space standards might be more appropriate for dwellings in town centre locations and/or close to transport hubs; however larger space standards would be more appropriate in the more suburban areas of the borough. It seems internal space standards are very much determined by the developer, and therefore may not maximise genuine housing choice for Lambeth residents (much higher risk for those requiring affordable housing). **It is recommended that the policy team revisit their options on how to encourage internal space standards that exceed minimum standards (or at least where a proportion of the development exceeds minimum internal space standards) [SA RECOMMENDATION 39].** A review of approach to internal space standards has potential for significant positive effects with regards to SA objective 6 as well as other objectives such as 5 (equalities), 7 (liveability), 2 (health and well-being).
- 5C6.33 It is considered that policy H5 (c) on communal amenity areas could be improved to increase and encourage the actual use of such spaces. As outlined in appraisal of policy against SA objective 2, SA recommendation 13 is further supported with respect to achieving SA objective 6.
- 5C6.34 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.
- 5C6.35 It is considered that policy H6 on house conversions effectively seeks to retain family sized homes. Rather than identifying streets not suitable for residential conversion (Local Plan 2015 approach), the policy protects dwellings suitable for occupation by families of less than 150m² from conversion into flats. Dwellings (as originally constructed) of at least 150m² may be converted into self-contained units subject to

meeting other standards. While the policy acknowledges unacceptable levels of noise and disturbance to occupiers and adjoining properties, and refers also to policy Q2 amenity; **it is considered that the policy should recognise that dwellings were not built with the intention to later convert into multiple units. As such noise insulation between floor levels is usually inadequate and occupiers of lower units can hear and feel through vibration occupiers of upper units moving around. As a minimum, it is considered that the supporting text should acknowledge this adverse effect of residential conversions, and where ceiling heights permit, effective noise insulation works in addition to carpeting of upper floors should be included as part of the conversion. It is recommended that the policy team further explore this as a means to mitigate and avoid adverse effects on occupiers and better enable 'quiet enjoyment' of homes that SA objective 6 seeks to achieve [SA RECOMMENDATION 40].**

- 5C6.36 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 and that a nominations agreement is in place for the lifetime of the scheme. Also, at least 35% of the accommodation should be affordable student accommodation. The policy seeks to protect areas from overconcentration of student and similar housing that may be detrimental to residential amenity.
- 5C6.37 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 temporary accommodation for homeless households, sheltered housing with care support, accommodation for victims of domestic abuse and/or violence, 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.
- 5C6.38 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. The policy also recognises that hostels and HMOs can result in adverse impacts of local streets, so additional off-street car parking in existing or planned controlled parking zones will not be permitted. The policy also recognises that an overconcentration of hostels and HMOs in an area can harm the mix, balance and well-being of communities so new hostels and HMOs will only be permitted where this would not lead to an overconcentration (need to be at least 150m away from each other). This seeks to protect existing amenity for local residents. Policy H10 for gypsy and traveller needs recognises that three additional pitches will be needed in Lambeth over the plan period, but that this need can be met by managing the churn in vacant pitches on the existing site. The policy adequately manages local amenity.
- 5C6.39 It is considered that policy H13 on estate regeneration should result in significant positive effects in the long term for both occupiers of the estate and residents of the surrounding area. Short term adverse effects may be experienced through decanting of existing estate residents and construction effects for local people in the surrounding area. However, it is considered the long-term gain outweighs the short-term effects. Estate regeneration provides Lambeth residents with more opportunities for better quality homes. Estate regeneration schemes must achieve at least 50% affordable housing, based on habitable rooms – applicants are encouraged to provide higher levels of affordable housing. Tenure of the affordable housing should

include an appropriate mix of low cost rented and intermediate affordable units to meet identified need and achieve mixed and balanced communities. **For transparency and fairness to developers and registered social providers, it is considered that the starting point for the tenure split should be the borough-wide policy requirement of 70/30 low cost rented/intermediate provision (in line with policy H2 and H12) – i.e the low cost rented affordable housing should comprise at least 70%. The policy team may wish to consider how to express this in the supporting text [SA RECOMMENDATION 41].** Similarly, in line with SA recommendation 39 made above, the policy team may wish to review internal space standards, in particular with regards to affordable housing provision. Finally, SA recommendation 30 on provision of social infrastructure within comprehensive estate regeneration scheme and SA recommendation 31 on reference to policy EN4 are further supported with regards to achieving SA objective 6.

5C6.40 Policy H12 build to rent seeks to maximise genuinely affordable housing provision for Lambeth residents and should result in significant positive effects for lower income groups. **Supporting text para 5.98 states ‘where low cost rented housing is provided in a separate core or block, this should be equivalent in design and appearance to the rest of the housing proposed in the scheme’. This is commended but it is recommended that the following is added to the end of the sentence: ‘and maintained as such’ or words to that effect [SA RECOMMENDATION 42].** This ensures the low cost block is maintained, and therefore remains equivalent in appearance for the lifetime of the building as the other block(s).

5C6.41 Policy H13 shared living provides a housing option that may be more appealing for young and/or single persons. It might attract those new to London and wanting to meet new people and therefore better enabling them to feel part of a community. It might also attract those no longer able to live in student accommodation, but wishing to stay in central locations. Shared living will only be supported in Waterloo and Vauxhall, and it is consider these locations are appropriate for the intended occupiers, while enabling feasibility to provide affordable housing contributions.

Economic development policies ED1, ED3, ED4, ED5 and ED7

5C6.42 Policy ED1 seeks to retain and increase office floorspace in the borough. Exceptionally, partial replacement of existing B1a floorspace in a mixed use redevelopment will be considered where other significant planning benefits, such as a high proportion of affordable housing, are provided. This reinforces the council’s priority in delivering affordable housing, and is commended in light of SA objective 6. However **there is no guidance in this section of what a ‘high proportion’ of affordable housing would be, nor is there any guidance on tenure split. If it will be considered on a case-by-case basis subject to viability and maximising feasible proportion of office floorspace, then perhaps this should be stated in the supporting text. It is recommended the policy team clarify this [SA RECOMMENDATION 43]. It is further recommended that the second sentence of clause (d) is changed from ‘...will be considered...’ to ‘...may be considered...’ This terminology conforms better with the use of the word ‘exceptionally’ [SA RECOMMENDATION 44].**

5C6.43 Some KIBAs have been identified as having potential for both intensification and co-location with residential and other uses (TfL land on the Montsford KIBA and Knolly’s Yard KIBA). There are no specific design considerations over and above those set out in London Plan policy E7 E that should be taken into account specific to these identified sites. Would separate access for KIBA use and residential use be

appropriate, for example? Would particular residential configurations in relation to KIBA be warranted? It is unclear whether the residential elements in these KIBAs need to meet the housing standards set out in policy H5. **It is recommended policy revisit this part of the policy and consider whether any additional guidance is necessary to protect residential amenity [SA RECOMMENDATION 45].**

5C6.44 Policy ED5 provides for work-live developments offering flexible use of buildings and space to allow both work and living within them. **It is recommended that the first sentence of the policy is revisited by the policy team as two KIBAs do allow for the potential for residential use. It may be appropriate to soften the wording of this first sentence. Perhaps the following wording would be appropriate: 'Work-live development will not generally be supported in Key Industrial and Business Areas. It may be acceptable on non-designated industrial land, in Creative Enterprise Zones and in the KIBAs identified as having potential for residential use....' Or, Work-live development will not be supported in Key Industrial and Business Areas except for those KIBAs identified on the Policies Map (see Policy EN3(c)) [SA RECOMMENDATION 46].**

5C6.45 Town centres policy makes provision for new residential development on appropriate sites, and above ground floor units. This offers more housing choice, particularly for those that enjoy the lively activity that being in a town centre brings, and/or those who prefer/need to be close to town centre amenities and transport.

Social Infrastructure policy S2

5C6.46 Policy S2 seeks to ensure adequate social infrastructure provision is available for residents. Development proposals for more than 25 residential units should be supported by an assessment of anticipated impact on social infrastructure, and should include appropriate provision to meet the additional need that will arise from the new residential development. Similarly, development proposals for more than 500 residential units should incorporate suitable childcare provision to meet additional need arising from the developments that cannot be met from existing provision. This helps ensure a good standard of living and promotes a healthy lifestyle. SA recommendation 32 that such social infrastructure be made available to residents of the wider local area is further supported with reference to SA objective 6. Clause (b) allows use of residential floorspace for a nursery or childcare use subject to there being a specific local need, there is no readily available non-residential accommodation in the locality, and it would not result in the loss of a complete residential unit and remaining residential floorspace would meet standards required for a self-contained dwelling. **Nursery and childcare provision need access to private outdoor space. It is not clear where in the Draft Revised Lambeth Local Plan October 2018 policy would ensure this is provided. Perhaps through policy EN(d)(i), or perhaps through policy S2(a)(i), but it is not considered clear. Provision of child play space is clear with regards to residential developments of 10 or more units. It is recommended the policy team further consider this and be satisfied that when policy S2(b) is implemented, it results in access to adequate areas of outdoor space/ child play space [SA RECOMMENDATION 47].** Clarification of this will help determine if the SA Objective 7 prompt of child-friendly buildings and places is met.

Transport policy T6

5C6.47 A reduction in car ownership and private car trips is promoted in policy T6 parking. The maximum residential car parking standards set out in London Plan policy 6.1 will apply, except for areas PTAL 1 and 2 where Lambeth will apply few spaces per unit than the London Plan. Essential for Lambeth this means the CAZ, Waterloo and Vauxhall opportunity areas, Brixton and Streatham town centres and all areas of

PTAL 4-6 will be car-free. PTAL 2 and 3 areas are permitted to have up to 0.25 spaces per units and PTAL 1 areas may have up to 0.5 spaces per unit. These limits to car-parking should improve residential amenity and contribute to healthier lifestyles through improved air quality and promotion of walking and cycling (although it is recognised that car-free development may be problematic for those who require a vehicle for their employment).

Sustainable design and construction policy EN4

5C6.48 Policy EN4 seeks high standards of sustainable design and construction. New build residential development are encouraged to use the Home Quality Mark and Passivhaus design standards which seek to positively impact the occupants health and well-being, reduce the home's environmental footprint and improve resilience to flooding and overheating. Higher quality more sustainable homes are likely to result in more positive effects for residents in terms of SA Objective 6 and providing warm, decent, sustainable and more affordable-to-run homes.

Quality of Built Environment policies Q1, Q2, Q9, Q11 - Q14, Q20, Q22, Q27

5C6.49 Policy Q1 ensures that all new development, including dwellings are accessible to all, including disabled people, older people, other people with mobility constraints and children. **Policy Q2 protects the amenity of existing and future occupiers, neighbours and the visual amenity for the community as a whole. Clause (v) on noise could potentially be improved, particularly with reference to mitigating noise effects resulting from residential conversion. The policy team may wish to consider amending the clause so it reads: '...or internal layout/orientation/modification in accordance with London Plan D13.'** [SA RECOMMENDATION 48] It is then considered that the policy, together with other design policies will result in significant positive effects for quiet enjoyment of home and the protection of local amenity. Landscaping improves residential amenity and enjoyment of homes and neighbourhoods and therefore policy Q9 will result in positive effects on SA Objective 6. Similarly policy Q11 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 and rear gardens. To protect amenity value of rear gardens/amenity spaces, as a general rule no rear extensions should exceed more than 30% of the rear garden/amenity space area, and this is commended in terms of maximising benefits with regards to SA Objective 6. Policy Q12 on refuse and recycling storage and Policy Q13 on cycle storage also seek to protect residential amenity as does policy Q14 which does not support development in front gardens or prominent corner or side gardens; and there are specific requirements for proposals in rear gardens in order to protect amenity and habitat values of these spaces. The council will resist proposals for development in gardens (or land most recently used as garden) which would cause (among other things), unacceptable amenity impacts. It is considered these policies will result in significant positive effects on the achievement of SA objective 6. **Supporting text para 10.66 is noted - that policy Q14 'only applies to properties erected as or converted to single family dwelling houses or houses converted to flats or HMOs. For development on the amenity space of purpose-built flats see Local Plan policy EN1'. It is recommended the policy team consider also clarifying in this supporting text para what policy applies to development on amenity space of C2 use class [SA RECOMMENDATION 49].**

5C6.50 The vast majority of listed buildings in Lambeth are residential terraces, semi-detached houses and villas. Policy Q20 seeks to preserve and sustain the special interest and settings of these listed buildings, allowing people to enjoy their home and the local amenity in which they bought into. Policy Q22 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, some people may consider the policies 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. Basement developments are supported where there are no unacceptable impacts on cumulative effects in locality (among other things). Policy Q2 on amenity is referenced in the supporting text and applicants will be required to demonstrate reasonable consideration has been given to potential impact of construction on the amenity of neighbours. Overall, it is considered that policies Q20, Q22 and Q27 appropriately protect local amenity of residential areas.

Places and neighbourhoods policies PN1 – PN11

5C6.51 All places and neighbourhoods will need to comply with housing policies of the Local Plan. 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, agent of change principle and partnership working.

5C6.52 Housing is potentially an appropriate use within town centres, subject to relevant town centre policies. Some places and neighbourhoods policies specifically include provision of additional housing for example Waterloo, Vauxhall (3500 new homes), Brixton and Streatham support the inclusion of housing as part of a mixed use development. Housing is supported in West Norwood, Kennington/Oval, Clapham and Loughborough Junction. Opportunities for new housing development will be supported on suitable sites.

5C6.53 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 improving access to good housing.

Summary of Draft Revised Lambeth Local Plan October 2018 Policies

5C6.54 Overall, and taking into account the appraisal prompt questions and targets set out in the Sustainability Framework, it is likely that the Draft Revised Lambeth Local Plan October 2018 will have significant positive effects - albeit with some element of uncertainty on improving the existing baseline conditions - on ensuring everyone has access to decent, appropriate and affordable housing.

Table 16: Summary assessment of effects of 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	+/?	++/?	On the whole, and incorporating SA recommendations; it is considered that the Draft Revised Lambeth Local Plan October 2018 will generally have significant positive effects on SA Objective 6. This is because the Draft Revised Lambeth Local Plan October 2018 makes provision for new housing that will be of appropriate housing mix, type, tenure and size enabling social inclusion and the ability to remain in a community for a life time if so desired.	It is considered that the Draft Revised Lambeth Local Plan October 2018 provides the essential planning framework to accommodate housing that is decent, appropriate and affordable. However,	Permanent, provided affordable housing assigned as social rented/London affordable rent and intermediate housing

local amenity.			<p>Affordable housing policies have been strengthened (compared to Local Plan 2015) to better ensure delivery and availability of genuinely affordable homes for Lambeth residents (policy H2 and H12). All housing will be well designed both individually and with other buildings and the surrounding environment and all major residential developments will need to provide for affordable housing. Residential amenity will be protected. The SA recommends consideration of amenity, particularly in terms of noise, for residential conversions between flats. There is also a risk that developers might only build to internal minimum floorspace standards which may have adverse effects on housing choice particularly for low income groups, The SA recommends policy reconsider options on how to provide a range of housing sizes for the same number of bedrooms.</p> <p>Overall, and taking into account SA recommendation, it is considered that the housing policies make a significant contribution to positively addressing the key sustainability issues for housing, outlined in Table 4. Deliverability of housing completions (particularly in the short term and more likely in locations outside of Opportunity Areas) may be somewhat uncertain given the uncertainty on how the UK will leave the EU but this is expected to be rectified in future years. Similarly, delivery of necessary infrastructure to support housing and associated population growth is uncertain. Provision of infrastructure or lack of will likely have significant impact on people's enjoyment of their home.</p>	<p>uncertainty on the delivery of the extent of housing proposed by the Draft Revised Lambeth Local Plan October 2018 is a possibility, particularly in the short term (despite exceeding targets in the last 10 years). This is mainly in response to the uncertainty in how the UK will leave the EU and how this will affect housebuilding/labour etc. Improved access to decent, appropriate and affordable housing is considered more certain for the medium to long-term.</p>	remains so in perpetuity.
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Recommendations for monitoring likely significant and uncertain effects

5C6.55 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Housing supply: number of net additional dwellings completed
- Gross affordable housing - % of habitable rooms in major developments (completions and approvals)
- Tenure of new affordable housing (completions and approvals)
- Net additional student bedspaces completed
- Number of specialist older persons housing units completed
- Gypsy and traveller pitches
- Resident survey satisfaction on housing

5C7 LIVEABILITY AND PLACE

5C7.1 This section of the SA relates to the sustainability performance of the 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.

5C7.2 To achieve this objective, plan policies should protect and 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 places; promote Lambeth as a place that people want to put down roots rather than just pass through; support the provision of quality, affordable and healthy food; help all Lambeth communities feel they are valued and are part of their neighbourhoods; encourage people to take greater responsibility for their neighbourhood; and help people lead environmentally sustainable lives.

Relevant policy objectives

National Level

5C7.3 The *NPPF 2018* contains a number of policies that seek to improve liveability of places. These include policies on ensuring vitality of town centres, promoting healthy and safe communities and achieving well-designed places. For example paragraph 127 states planning policies and decisions should ensure developments establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

Regional Level

5C7.4 The draft London Plan 2018 contains a raft of policies that all work together to help create a sense of place and community belonging. For example policies GG1 building strong and inclusive environments, SD6 town centres, D7 public realm and HC1 heritage conservation and growth.

Baseline conditions and existing issues

5C7.5 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.

5C7.6 Though Lambeth is a largely residential borough with many long term residents – around 80 per cent of the population has been resident in Lambeth for over two years and 50 per cent over five years – population turnover, or ‘churn’, is high and is currently estimated at 22-24 per cent every year (SOB 2016).

5C7.7 The 2015 Index of Multiple Deprivation (IMD) places Lambeth as eighth most deprived borough in London and 22nd most deprived in England. This is an improvement over the position in 2010, but still places Lambeth in the top 10 per cent of the most deprived local authorities in the country (SOB report 2016).

- 5C7.8 Lambeth combines areas of affluence with areas of severe poverty and deprivation. The most deprived areas are spread throughout the borough but are particularly concentrated in Coldharbour and Vassall wards in Brixton and in parts of Knights Hill ward, in the south of the borough. The most affluent areas include the Thames-side part of Bishops ward, parts of Clapham and the Dulwich border area of Thurlow Park. 13 of Lambeth's super output areas are in the top 10 per cent nationally, which is a rise as in 2010 only eight areas were in this range (SOB report 2016).
- 5C7.9 Community cohesion in terms of residents seeing their local area as a place where people from different backgrounds get on well together is both high and improving. In 2016 nine in ten (94%) residents see their local area as a place where people from different backgrounds get along well together, up from 87% in 2015. This agreement in relation to cohesion issues is in line with the 93% recorded previously in 2014. Just 3% of residents disagree that residents from different backgrounds get on well together (Lambeth residents survey 2016).
- 5C7.10 Importantly, this perceived high level of community cohesion is evident throughout the borough with between 92% and 95% of all residents per neighbourhood area agreeing that their local area is place where people of different backgrounds get on well together. It should be noted that data collection in this research was completed shortly before the EU referendum and the post-Brexit spike in hate crime that has been reported nationally. The wording of this question, which replicates the wording used nationally, does not define what these 'different backgrounds' might be (ethnicity, religion, sexuality etc), but it is important to analyse perceptions by these equality strands. Disagreement that the local area is a place where people of different backgrounds get on well together does not vary significantly between ethnic groups. There is also no significant variation between those who state English is their first language and those who state it is not. While this is also the case when responses are viewed by disability, those without a long term illness or disability are significantly more likely than those who do to agree at this community cohesion question (89% and 98% respectively). Sexuality is the equalities strand where views on how well people of different backgrounds get on vary most obviously, with agreement dropping significantly to 81% among Lesbian/Gay/Bisexual residents compared to 95% of those who are heterosexual. Furthermore, 12% of Lesbian/Gay/Bisexual residents disagree that this is the case (Lambeth residents survey 2016).
- 5C7.11 It is also notable that irrespective of how long residents have lived in the borough, (eight durations ranging from less than 6 months up to 10 years or more), at least nine in ten of each group believe that their local area is a place where people from different backgrounds get on well together. While the number of residents who express dissatisfaction with their local area is low. It can be observed that among those with this viewpoint the proportion who feel that people of different backgrounds get on well together rises to 18%, a proportion that is significantly higher than the survey average of 3%. On this basis, cohesion issues may be an influence on wider neighbourhood perceptions in a small number of cases (Lambeth residents survey 2016).
- 5C7.12 Among Lambeth residents there is a strong sense of belonging to neighbourhood. Most people feel like they belong to their neighbourhood (87%) and would speak highly of it (83%). Alongside this around four in five would be willing to work together with others on something to improve their neighbourhood (83%), say that the friendships and associations they have with other people in the neighbourhood mean a lot to them (81%), and that neighbours help each other (79%) (Lambeth residents

survey 2016).

Table 17: Changes in perceptions of neighbourliness 2014 to 2016

	2014	2015	2016	% point change 2015-16
I feel like I belong to this neighbourhood	81%	72%	87%	+15
I would speak highly of my neighbourhood if asked	77%	70%	83%	+13
I would be willing to work together with others on something to improve my neighbourhood	79%	68%	83%	+15
The friendships and associations I have with other people in my neighbourhood mean a lot to me	71%	67%	81%	+14
Neighbours around here help each other	74%	63%	79%	+16
I regularly stop and talk with people in my neighbourhood	69%	61%	77%	+16
If I needed advice about something I could go to someone in my neighbourhood	68%	58%	77%	+19
Community events that I would like to get involved with happen in my area	57%	56%	66%	+10

(Lambeth residents survey 2016)

5C7.13 Given these notable shifts it is important to note that over the last three years of data the distribution of the time residents have lived in the borough is consistent. This is demonstrated by the table below. Therefore the above improvements do not appear to be related to any greater incidence of more established residents (Lambeth residents survey 2016).

Table 18: Length of residence in the borough (2014-2016)

Time in Lambeth	2014	2015	2016
Less than 6 months	5%	5%	5%
6 months to one year	7%	7%	7%
Over one and up to two years	8%	9%	8%
Over two and up to 5 years	15%	13%	14%
Over 5 and up to 10 years	13%	15%	13%
More than 10 years	52%	51%	52%
Don't know	*%	*%	0%

(Lambeth residents survey 2016)

5C7.14 Breaking responses down geographically shows that positive responses in relation to neighbourhoods and neighbourliness are found in all locations. However, residents of Streatham and to a lesser extent Norwood most commonly agree to the statements on this subject. In contrast, Clapham residents are generally less likely to agree. In 2015 Streatham residents were also the most positive about their local area with high

or the highest agreement ratings across most measures of neighbourliness. For reference, the proportion of residents in each area who have lived there for a year or less can be found in the table below. The proportion of these 'new arrivals' is lowest in Streatham where views on neighbourliness are highest.

Table 19: Measures of community cohesion and neighbourliness by area

% agree	North Lambeth (236)	Clapham (251)	Brixton (215)	Norwood (144)	Streatham (196)
I feel like I belong to this neighbourhood	86%	84%	84%	88%	94%
I would speak highly of my neighbourhood if asked	82%	83%	81%	81%	89%
I would be willing to work together with others on something to improve my neighbourhood	80%	82%	84%	83%	88%
The friendships and associations I have with other people in my neighbourhood mean a lot to me	83%	76%	79%	85%	81%
Neighbours around here help each other	78%	75%	82%	78%	83%
I regularly stop and talk with people in my neighbourhood	77%	73%	77%	79%	78%
If I needed advice about something I could go to someone in my neighbourhood	79%	68%	79%	78%	80%
Community events that I would like to get involved with happen in my area	65%	63%	63%	75%	69%
% of residents who have lived in the area for a year or less	14%	12%	17%	10%	8%

(Lambeth residents survey 2016)

- 5C7.15 As a collaborative council Lambeth seeks opportunities to work with its residents and to enable them to deliver community improvements. When considering their willingness to work together with others on something to improve their neighbourhood those most likely to agree they would do this include:
- Streatham residents (88%);
 - Those aged 55-64 (87%) and 35-44 (84%);
 - Those who have lived in the borough 5-10 years (84%) or 10 years or more (84%).

The groups most likely to disagree that they feel that they belong to their neighbourhood include:

- Black Caribbean (12%);
- Homemakers (14%) – interesting given they are likely to spend more time locally;
- The unemployed (12%);
- Those who rent from the council (12%).

Likely evolution without the Draft Revised Lambeth Local Plan October 2018

5C7.16 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, adopted Local Plan 2015 policies will 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. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of draft Policies

5C7.17 This section examines the likely significant effects of implementing the Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 7 Liveability and Place. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

5C7.18 The following policies have been screened as having potential for significant effects on this objective:

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
D5 - Enforcement	T5 – River transport
H1 – Maximising housing delivery	T6 – Parking
H2 – Delivering affordable housing	T9 – Digital connectivity
H3 – Safeguarding existing housing	EN1 – Open space, biodiversity and green infrastructure
H4 – Housing mix in new developments	EN2 – Local food growing and production
H5 – Housing standards	EN5 – Flood risk
H6 – House conversions	Q1 – Inclusive environments
H7 – Student housing	Q2 – Amenity
H8 – Housing to meet specific community needs	Q3 – Safety/crime prevention
H9 – Hostels and HMOs	Q4 – Public art
H10 – Gypsy and Traveller needs	Q5 – Local distinctiveness
H11 – Estate regeneration	Q6 – Urban design / public realm
H12 – Build to rent	Q7 – Urban design / new development
H13 – Shared living	Q8 – Design quality / construction detailing
ED1 – Offices (B1a)	Q9 – Landscaping
ED3 – KIBAs	Q10 - Trees
ED4 – Non-industrial sites	Q11 – Building alternations and extensions
ED5– Work-live development	Q12 – Refuse / recycling storage
ED7 – Town centres	Q14 – Development in gardens
ED8 – Evening economy and food and drink uses	Q15 – Boundary treatments
ED9 – Public Houses	Q16 – Shop fronts
ED10 - A2 uses	Q17 – Advertisement/signage
ED11 – Local centres and dispersed local shops	Q18 – Historic environment strategy
ED12 - Markets	Q19 – Westminster world heritage site
ED13 – Visitor attractions, leisure, arts and culture uses	Q20 – Statutory listed buildings
ED14 – Hotels and other visitor accommodation	Q21 – Registered parks and gardens
S1 – Safeguarding existing social infrastructure	Q22 – Conservation Areas
S2 – New or improved social infrastructure	Q23 – Undesignated heritage assets
S3 - Schools	Q24 – River Thames
	Q25 - Views
	Q26 – Tall buildings
	Q27 - Basements
	PN1 – Waterloo
	PN2 – Vauxhall

PN3 – Brixton
PN4 – Streatham
PN5 – Clapham
PN6 – Stockwell
PN7 – West Norwood

PN8 – Kennington / Oval
PN9 - Herne Hill
PN 10 – Loughborough Junction
PN11 – Upper Norwood

Delivery and Monitoring policies D1 – D5

5C7.19 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 (although actual delivery can be uncertain) 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

5C7.20 It is considered that the housing policies should result in significant positive effects on SA Objective 7. New housing, including estate regeneration, affordable housing, mix of dwelling sizes (including protection of family sized homes from conversion), as well as outdoor amenity spaces provided with housing 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. Residential densities will be determined taking into account site context, connectivity and accessibility by walking, cycling and public transport, and the capacity and quality of provision of surrounding infrastructure. This helps ensure that higher density residential developments are in areas that can sustain liveable, mixed use physical and social environments, accessible to necessary infrastructure and services. Policy H3 safeguards existing housing and introduces a new clause that limits short-term holiday rental accommodation to a cumulative period of no more than 90 days a year. Applications for change of use to permanent residential accommodation to short-term holiday lets will not be supported. This helps promote social cohesion, safety and security and sense of place for communities and neighbourhoods – particularly those in the north of the borough, Thames-side, and close to more desirable town centres/amenities.

5C7.21 Policy H4 provides for a range of housing sizes from one bedroom units to 3-bed units and more. This enables older people the option to downsize and remain in the borough or their local area, and provides provision of families with larger sized units. The 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 type can feel a sense of place to the local area. It makes provision of housing to meet specific community needs, benefits the more vulnerable groups of society (for example older persons, those with significant mental or physical health limitations), and offers a housing choice that enables Lambeth residents to remain in the borough should they so wish. Recommendation 27 for the policy team to reconsider the lack of visitor car-parking provision for specific needs housing is further supported with respect to achieving SA objective 7 and helping promote long-term social cohesion, engagement and sense of place for these residents. Avoiding over-concentration of hostels and HMOs in an area seeks to protect residential

amenities of neighbourhoods, while other parts of policy H9 seek to help individuals that require such forms of housing to feel valued and part of the neighbourhood by ensuring the housing is appropriately located (ie accessible to range of services and facilities). Continued safeguarding of the existing gypsy and traveller site should also result in sense of place feelings for gypsies and travellers.

- 5C7.22 The residents survey 2016 found that those who rent from the council are among those most likely to disagree that they belong to their neighbourhood. Overall it is considered that policy H11 on estate regeneration seeks to address this and provide a physical and social environment to promote social cohesion and sense of place. For example increased permeability and integration into the existing urban fabric, improved access and public realm and new routes through estates as appropriate. Estates will also have to comply with the Lambeth Housing Design Principles. **All areas of estate land (except private areas of residential units) should be subject to passive surveillance. Blank walls and facades should be avoided. This will further assist in making people feel positive about the area where they live. It is recommended that the policy team is satisfied there is policy provision to ensure this [SA RECOMMENDATION 50].**
- 5C7.23 Large-scale purpose-built shared living will not appeal to all people but offers a housing choice for those (likely young and/or single) who wish to live in Waterloo and Vauxhall, that may not otherwise be able to do so. Limiting this housing type to these locations and avoiding over-concentration of similar uses (like purposes-built student housing) help protect residential amenity, neighbourliness and enable these areas to be places people want to put down roots, as well as recognising these locations as suitable for housing that may encourage shorter-term occupation. **The policy team may wish to consider defining Waterloo and Vauxhall as their respective Opportunity Area designations [SA RECOMMENDATION 51].**
- 5C7.24 ***Economic Development and Town Centres policies ED1, ED3-ED5, ED7 – ED14***
Overall it is considered that the economic development and town centre policies should result in positive effects on 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 ED7 also seeks 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 different 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 Local Plan which further assists in producing well designed and liveable town centres.
- 5C7.25 Policy ED8 Evening economy and food and drink uses has been improved to better ensure liveability and place of town centres and help make people feel positive about their area. Evening and food and drink uses will not be supported where this would cause unacceptable harm to community safety or the amenity of neighbouring residential areas or sensitive uses as a result of (among other things) noise, litter, increase in anti-social behaviour, impact of delivery vehicles/services and traffic generation. Opening hours of hot food takeaways may be controlled through condition where necessary to manage impacts on neighbouring residential amenity. These modifications to policy improve the liveability and place of town centres and surrounding environments. **The policy also seeks to avoid stopping up of public highway with outdoor seating. It is noted that this management of public highway only applies for food and drink uses even though sandwich boards/A-frame boards associated with A1 uses can result in the same or similar effects**

for people using pavements. It is considered the draft Plan does not contain clear policy on this. It is recommended that the policy team revisit this and are satisfied that it is appropriately managed, either by other Draft Revised Lambeth Local Plan October 2018 policy or by the council through public highway permits [SA RECOMMENDATION 52]. Better control of these sandwich/A-frame board advertisements would help improve permeability and accessibility of town centre streets, and improve walking routes (for example in Brixton) and actually deliver one of the strategic outcomes of the Transport Strategy 2019: 'Pedestrians have genuine priority on our streets, with the whole street environment tailored to their needs' (also repeated in Draft Revised Lambeth Local Plan October 2018 policy T1 supporting text) and achieve draft revised policy T2(e). Policy ED9 on Public Houses will likely provide significant positive effects in terms of SA Objective 7. Pubs often play a valuable role in local community life, providing a hub for social interaction, and contributing to the identity and character of an area. If a public house is considered to have townscape or heritage value, the council will seek to retain the building and special features, also contributing positively towards the attainment of SA Objective 7.

5C7.26 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, betting shops and payday loan shops in town centres, 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.

5C7.27 Policies ED11– ED14 are also likely to result in positive effects on liveability and place. Policy 11 recognises the role local centres play for residents and seeks to ensure key local retail uses are retained at a very local scale to meet day-to-day needs of communities, particularly more vulnerable groups with reduced accessibility and/or mobility. Any loss of local centre premises must be justified through stringent marketing requirements. Policy ED12 makes provision for new markets provided that existing shopping facilities or markets located within town centres are not harmed and local amenity and traffic is not adversely affected. The policy protects existing indoor and street markets which in some areas of the borough, such as Brixton, will likely result in significant positive effects on liveability and place and the prompt questions/targets set out in the sustainability framework. Policy 13 seeks to safeguard and improve leisure, recreation, arts and cultural facilities in the borough, particularly in CAZ, Vauxhall and Waterloo Opportunity Areas and town centres, all of which provide good social environments and promote community engagement and interaction. Improvements to public realm associated with this use may be sought through planning obligations, further seeking to meet targets of SA Objective 7. Policy ED14 on hotels and other visitor accommodation has been improved taking account of existing levels of hotels in particular areas of the borough and ensuring new provision does not unacceptably harm the balance and mix of uses in the area, including services for the local residential community. Only strategically significant serviced visitor accommodation will be supported in the Vauxhall opportunity area where it does not result in intensification of existing concentrations. No further visitor accommodation will be permitted in Waterloo opportunity area. Proposals for new or extended visitor accommodation should include an assessment of impact on neighbouring residential amenity and visitor management plans that assess impact of visitor numbers on the local area will be required. It is considered this policy positively contributes to the achievement of SA objective 7.

Social Infrastructure policies S1, S2 and S3

5C7.28 Policies S1, S2 and S3 will likely result in significant positive effects on liveability and place. Adequate social infrastructure is necessary to ensure environments are liveable and sustainable. Policy S1 offers provision for safeguarding existing social infrastructure, 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 where existing use no longer need, or it is re-provided, or development will enable delivery of approved strategies for service improvements. Policy S2 seeks to ensure adequate social infrastructure provision is available for residents. Development proposals for more than 25 residential units should be supported by an assessment of anticipated impact on social infrastructure, and should include appropriate provision to meet the additional need that will arise from the new residential development. Similarly, development proposals for more than 500 residential units should incorporate suitable childcare provision to meet additional need arising from the development that cannot be met from existing provision. This helps ensure a good standard of living and promotes a healthy lifestyle. SA recommendation 32 that such social infrastructure be made available to residents of the wider local area is further supported with reference to SA objective 7. Similarly SA recommendation 47 on outdoor/child play space for nursery and childcare provision is further supported. Clarification on whether such outdoor space is provided for in the draft Plan will help determine if the SA Objective 7 prompt of child-friendly buildings and places is met.

5C7.29 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.

Transport policies T1 – T6 and T9

5C7.30 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 under the Draft Revised Lambeth Local Plan October 2018. 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 provide parking only where it is necessary. Submission of travel plans with all major planning applications seeks to mitigate effects on liveability and place, promote sustainable travel and minimise number of car trips. It is considered that the policies sees to reduce the proportion of public realm where environmental factors such as car fumes make it unpleasant to be and enhance quality of public realm – a prompt/target for achievement of SA Objective 7.

5C7.31 Policy T9 on Digital connectivity infrastructure 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.

Environment and Green Infrastructure policies EN1, EN2, EN5

5C7.32 Overall, the environment policies will likely result in positive effects on SA Objective 7. Green infrastructure and protection of open space improves sense of place and creates healthier places people want to stay and set down roots in. Green

infrastructure improves amenity of local environments. Local food growing initiatives have substantial potential to bring different communities together, promote social engagement, interaction and learning, provide opportunities for more sustainable living and help people for more positive of the area they live. Flood risk policy seeks to minimise impact of flooding in the borough and make developments as safe as possible.

Quality of the Built Environment policies Q1 – Q27

- 5C7.33 Overall it is considered policies Q1 – Q27 seek to provide well-designed, liveable, physical and social environments that contribute to sense of place and long-term social cohesion.
- 5C7.34 Policy Q3 on safety, crime prevention and counter terrorism, and particularly supporting text paragraph 10.6 outlines design responses which will not be considered appropriate and positive design responses that will be encouraged. These effectively contribute to creating an environment conducive to achieving liveability and sense of place in Lambeth.
- 5C7.35 Policy Q4 addresses public art, which has potential to create significant positive effects on liveability and place.
- 5C7.36 Policies Q5 to Q8 should result in positive effects for design of developments and surrounding environments.
- 5C7.37 Landscaping and trees contribute to positive feelings of sense of place and pride for people and often provide an environment conducive to social interactions.
- 5C 7.38 Policy Q14 seeks to limit development in gardens and it is considered this policy effectively maintains liveable physical and social environment, protects amenity, and helps people feel positive about where they live. It is recognised that some people may consider their ability to extend (policy Q11) or build in the rear garden is restricted and therefore might adversely impact on their feelings of sense of place/enjoyment of home/ability to stay in the local area with a growing family.
- 5C7.39 Policies Q18 to Q23 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.
- 5C7.40 Providing a continuous river walkway supports SA Objective 7 and enhancing the quality and quantity of open space and public realm. Policies Q25 (views) and Q26 (tall and large buildings) should also result in positive impacts for liveability and place. Cumulative effects of basement development are taken into account in determining there will likely be unacceptable impacts, and therefore adverse effects (at least temporarily) to liveability and place.
- Places and Neighbourhoods policies PN1 – PN11***
- 5C7.41 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 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.

- 5C7.42 Policy PN2 on Vauxhall will also likely result in significant positive effects 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, consolidate and expand cultural and evening economy uses between places of interest and connecting and improving existing green spaces. 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.
- 5C7.43 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 and details specific levels of A1 retail and A3/4/5 uses which are considered to be effective for achieving SA Objective 7. 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. Provision of affordable workspace, traffic reduction measures and improvements to the quality of public transport all further contribute to maximising liveability and sense of place in Brixton.
- 5C7.44 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 two distinct hubs of Streatham will be supported and specific levels of A1 retail and A3/4/5 uses are sought. Landmark buildings providing destinations for people of the wider catchment, enhancement of community facilities, mixed use developments including housing, will likely promote community engagement and result in people feeling positive about where they live.
- 5C7.45 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 evening economy (compliance with policy ED8). The policy sets its own specific maximum percentage targets for A1 retail and A3/4/5 across the centre as a whole. No additional pubs and bars or hot food takeaways will be permitted. The policy will likely result in improved liveability and feelings of sense of place.
- 5C7.46 Improvements to housing estates and connections between housing estates as well as improved traffic and environmental conditions for pedestrians and cyclists will likely result in enhanced sense of place and improved community cohesion for Stockwell, as provided for in policy PN6.
- 5C7.47 It is considered that liveable, mixed use physical and social environments should result in the West Norwood district centre as a result of policy PN7. Retail floor-space, education and other community facilities including 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 PN7.

- 5C7.48 The policy PN8 for Kennington/Oval seeks to support growth of the area as an important residential and employment area while reinforcing and adding to the quality of its existing well-defined character and sense of place and seeking maximum community benefit from development proposals. High quality regeneration for mixed use of the Oval gasworks and adjacent Tesco sites is expected. It also seeks to improve the relationship of the stadium with the adjoining area, particularly improved linkages and public realm and mitigate any harmful impacts of large numbers of visitors on the surrounding area. 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.
- 5C7.49 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.
- 5C7.50 It is considered that the policy for Loughborough Junction (PN10) should result in significant positive effects for the area in terms of improving liveability and providing a better sense of place. 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.
- 5C7.51 Policy PN11 for Upper Norwood also supports opportunities for physical improvements that will enhance and improve the centre's character and improve conditions for traffic and pedestrians in the area as well as transport links to other parts of London. The policy also seeks a vibrant arts and cultural scene and growth in the creative and digital industries that should result in positive impacts in relation to SA objective 7.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

- 5C7.52 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is considered likely that the Draft Revised Lambeth Local Plan October 2018 policies should have a significant positive effect albeit with some element of uncertainty on recognising the existing baseline of population groups and in promoting social cohesion, sustainable lifestyles and sense of place.

Table 20: Summary of assessment of effects of 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	++/?	++/?	Generally, it is considered that the Draft Revised Lambeth Local Plan October 2018 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 should 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, in so far as planning is able to control/encourage.	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	Permanent and ongoing in terms of recognising and providing for specific needs of the community as population increases.

place.			<p>Mixed-use developments, including housing are proposed for Opportunity Areas, major centres and 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 Delivery Plan of Local Plan). The draft 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>in the short term.</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, sufficient 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>	
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Recommendations for monitoring likely significant and uncertain effects

5C7.53 It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Proportion of vacant units in Brixton and Streatham Major centres, Clapham, Vauxhall and West Norwood District centres and Lower Marsh/The Cut CAZ Frontage.
- Modal Share – walking, cycling and public transport
- Number of cycle parking spaces provided in completed major developments
- Number of disabled parking spaces per completed major development
- Amount of open space lost through completed planning permissions
- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Infrastructure Delivery Plan updates
- 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

5C8. BUILT AND HISTORIC ENVIRONMENT

- 5C8.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:
- SA Objective 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.

5C8.2 To achieve objective 8 plan policies need to protect, conserve and enhance sites, features and areas of historical, archaeological and cultural value/potential and their settings; enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals); respect visual amenity and the spatial diversity of communities; aspire to a range of buildings and architecture that reflect the cultural diversity of the borough; protect 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; protect valued views; and identify locations where tall buildings are acceptable.

Relevant Policy Objectives

National Level

5C8.3 Section 16 of the National Planning Policy Framework 2018 relates to Conserving and Enhancing the Historic Environment. It states that Plans should set out 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 well-designed places, section 12 of the NPPF provides guidance. The Government attaches great importance to a well-designed and safe built environment in achieving the social objective of sustainable development.

5C8.4 *Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans, 2015*

The purpose of this Historic England Good Practice Advice note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG). The advice in this document, in accordance with the NPPF, emphasises that all information requirements and assessment work in support of plan-making and heritage protection needs to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets.

5C8.5 *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, 2015*

This advice note provides information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG). This document sets out guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. It supersedes 'The Setting of Heritage Assets: English Heritage Guidance 2011'.

5C8.6 *Historic England Advice Note 4: Tall Buildings, 2015*

This Historic England Advice Note updates previous guidance by English Heritage and CABE, produced in 2007. It seeks to guide people involved in planning for and designing

tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. The advice is for all relevant developers, designers, local authorities and other interested parties. In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of the local plan. Techniques such as characterisation and building height studies provide evidence to support a local height definition for tall buildings and the identification of appropriate locations in local plans. This can be used to create clear core strategic policies, site allocations and development management policies, supported by supplementary planning advice where appropriate.

Regional Level

- 5C8.7 Chapter 7 of the draft *London Plan 2018*, Heritage and Culture, contains policies on historic environment including views and vistas; chapter 3 contains policies on Design including London's forms and characteristics, good and inclusive design, and chapter 8 contains policy on protection of open space.

Baseline conditions and existing issues

- 5C8.8 Lambeth has approximately 2,500 listed buildings. The vast majority of these are residential properties erected between 1800 and 1850; they are generally in good condition. 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) was established in 2010 with a priority being placed on properties outside conservation areas. The local list has been updated, most recently in April 2017 and the number of assets on the local list has increased based on the additional information available to the council.

- 5C8.9 There are 62 conservation areas in Lambeth covering approximately 30 per cent of the borough. They are largely residential in character, some cover town centres. Lambeth Palace and its environs are of particular significance, so too are The South Bank, characterised by post-war cultural and civic buildings, and West Norwood Cemetery. Again the majority of conservation areas are in good condition. Some have been subject to much investment and refurbishment. Others have been subject to a very gradual erosion of historic detailing through incremental change over many years. However, the character of some was already in a relatively eroded state at the time of designation - the objective at that time being their enhancement. The borough also has seventeen archaeological priority zones, eight historic registered parks and gardens (of which two are private), seventeen protected squares under the London Squares Preservation Act 1931 and has protected strategic views in the north of the borough including those of St Paul's Cathedral and the Westminster World Heritage Site.

- 5C8.10 Heritage assets are exceptionally important across Lambeth. They are our most recognisable landmarks and most cherished places - they contribute in very great part to reinforcing Lambeth's local distinctiveness as part of the wider city. The range of significant buildings and places and the uses they contain create a unique and very distinctive sense of place which is what attracts residents, visitors and investors alike to Lambeth. In this respect their contribution to the local economy and to the perception of Lambeth as a place is significant.

Likely future evolution without the draft revised Plan

- 5C8.11 Heritage assets are likely to continue to be preserved through legislation. However, without the new Local Plan, the current adopted Lambeth Local Plan will become out-of-date in 2020. 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 and design challenges of the built/natural/public realm may not be effectively addressed.

Assessment of draft revised Policies

- 5C8.12 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 8 Built and Historic Environment. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.
- 5C8.13 The following policies have been screened as having potential for significant effects on this objective:
- D1 – Delivery and monitoring
 - D2 – Presumption in favour of sustainable development
 - D3 – Infrastructure
 - D4 – Planning obligations
 - H1 – Housing growth
 - H3 – Existing housing
 - H5 – Housing standards
 - H6 – Residential conversions
 - ED7 – Town centres
 - ED8 – Evening economy and food and drink uses
 - ED9 – Public Houses
 - ED11 – Local centres
 - ED12 - Markets
 - ED13 – Visitor attractions, leisure, arts and culture
 - T2 – Walking
 - T3 - Cycling
 - T5 – River transport
 - T9 – Digital connectivity
 - EN1 – Open space
 - EN2 – Local food growing and production
 - EN4 – Sustainable design and construction
 - Q2 – Amenity
 - Q3 – Community safety / crime
 - Q4 – Public art
 - Q5 – Local distinctiveness
 - Q6 – Urban design / public realm
 - Q7 – Urban design / new development
 - Q8 – Design quality / construction detailing
 - Q9 – Landscaping
 - Q10 - Trees
 - Q11 – Building alternations and extensions
 - Q12 – Refuse / recycling storage
 - Q14 – Development in gardens
 - Q15 – Boundary treatments
 - Q16– Shop fronts
 - Q17 – Advertisement panels and signage
 - Q18 – Historic environment strategy
 - Q19 – Westminster world heritage site
 - Q20 – Statutory listed buildings
 - Q21 – Registered parks and gardens
 - Q22 – Conservation Areas
 - Q23 – Undesignated heritage assets
 - Q24 – River Thames
 - Q25- Views
 - Q26 – Tall buildings
 - Q27 - Basements
 - PN1 – Waterloo
 - PN2 – Vauxhall
 - PN3 – Brixton
 - PN4 – Streatham
 - PN5 – Clapham
 - PN6 – Stockwell
 - PN7 – West Norwood
 - PN8 – Kennington / Oval
 - PN9 - Herne Hill
 - PN 10 – Loughborough Junction
 - PN11 – Upper Norwood

Delivery and Monitoring policies D1 – D4

- 5C8.14 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 in place prior to occupation of new developments for example transport and health social care provision.

Housing policies H1, H3, H5, H6

- 5C8.15 Overall it is considered that positive effects should result on the built environment from the housing policies. Although a high level of housing growth is proposed, such housing is expected to be well-designed, optimise housing delivery on all

suitable and available brownfield land and the bringing back into use of long-term vacant or derelict homes is supported. **Policy H1 (ii) states that delivery of well-designed new homes on small sites capable of accommodating up to 25 units will be delivered. All housing development is expected to be well-designed (or of 'good design' or 'high standard')** so it is unclear what value this policy wording contributes to the actual delivery of housing on 'small sites'. It is recognised that London Plan policy D2 states boroughs should pro-actively support 'well-designed new homes on small sites'. Perhaps there needs to be some further information or signposting in the supporting text on how 'well-designed' housing on small sites might differ from other housing development. It is noted that London Plan policy H2B states boroughs should prepare area-wide design codes for small housing developments between 1 and 25 homes. Perhaps this should be mentioned and elaborated on in the supporting text, for example mention of the forthcoming SPD [SA RECOMMENDATION 53].

Economic development and town centre policies ED7 - ED9, ED11 - ED13

5C8.16 It is considered that the economic development and town centre policies will result in significant positive effects on SA Objective 8, in particular on protecting and enhancing the townscape/cityscape character and its contribution to local distinctiveness. 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 protect and enhance townscape / cityscape character. Major redevelopment proposals will also need to re-provide small 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. However, SA recommendation 52 on ensuring the management of sandwich boards on footpaths is further endorsed with respect to improving character of town centres. Policy ED9 seeks to protect public houses for their economic and social roles, but also seeks to retain these buildings where appropriate for their architectural / townscape character / heritage and cultural merit too.

5C8.17 Policy ED13 should result in significant positive effects on SA Objective 8. It seeks to safeguard visitor attractions, leisure, arts and culture uses and lends itself to support possibilities for cultural events / activities, contributing to enjoyment of cultural and historical sites. The policy enhances townscape/cityscape character, particularly for its cultural value. The markets policy (ED12) positively contributes to enhancing cultural diversity and value in the borough by protecting existing markets and supporting new market proposals where other conditions are also met. 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 (undesignated) historical value to people.

Transport policies T2, T3, T5, T9

5C8.18 Policies T2 on Walking and T3 of Cycling seek to provide physical environments (i.e. walking and cycling routes) conducive for active travel, accessible to all, 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.

5C8.19 Policy T9 supports electronic communications equipment that do not cause unacceptable harm to the character and appearance of an area or building and will not be visually intrusive in the street scene or create unacceptable clutter. (Taking this into account SA recommendation on management of sandwich boards on streets is further supported – electronic communications equipment and outdoor seating for food and drink uses are controlled – so sandwich boards which create the same adverse accessibility and visual effects should also be controlled).

Environment policies EN1, EN2, EN4

5C8.20 Policies EN1 and EN2 should result in significant positive effects on SA Objective 8, as policy EN1 seeks to protect open spaces and green infrastructure and increase their provision, and policy EN2 provides for food growing spaces including temporary use of vacant or derelict land or buildings. Policy EN4 is on sustainable design and construction and the policy now seeks much more ambitious sustainability standards, BREEAM and BREEAM non-Domestic Refurbishments 'excellent' ratings and the encouragements of Home Quality Mark or Passivhaus design standards for new residential development.

Quality of Built Environment policies Q2 – Q27

5C8.21 Overall, it is considered that the above policies should result in significant positive effects on the built and historic environment. Policies emphasise the need for well-designed buildings with use of quality materials where local distinctiveness is sustained and reinforced. This includes both local character and reflecting the cultural diversity of the Borough through appropriate architecture. Policy Q4 on public art seeks to enrich Lambeth's communities through culturally vibrant places, provision of places and spaces suitable for artistic and cultural programming and retention of good-quality public art that all serves to enhance the character of the borough. Policies Q6 and Q7 and Q8 set out the expectations regarding the urban design of public realm, new developments and construction detailing, all of which work together to improve attractiveness, character and sustainability of the built environments through high quality design.

5C8.22 Policies Q9, Q10 and Q14 provide for landscaping, green infrastructure protection of gardens, and together with urban design policies should result in significant positive effects on SA Objective 8. The policies, together with environment policies will also help to mitigate against poor air quality which also help improve quality and attractiveness of the built environment. Refuse/recycling storage and cycle storage (policies Q12 and Q13) 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.

5C8.23 Policies Q15 to Q17 should result in significant positive effects on the built environment. Policies Q18 to Q23 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 Q25 which protects strategic views including panoramas, landmark silhouettes and roofscape views. Policy Q25 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.

5C8.24 Policies Q24 (River Thames) and Q26 (Tall and large buildings) should also result in positive effects on SA Objective 8. The supporting text of policy Q26 and Annex 11 identify potential locations where tall buildings are acceptable. Basement development will be supported where it can be demonstrated that no unacceptable

impacts will result to statutory listed buildings (among other criteria). **It is considered that the basements policy could be improved with respect to achieving SA objective 8 and its prompt questions/targets. The policy team may wish to consider adding 'and non-designated heritage assets' to clause (a)(vii) to further strengthen protection of these historic contributions. It is considered this shouldn't be too limiting on applicants as the policy recognises that some harm might be considered 'acceptable' (through use of the term 'no unacceptable harm'). There is also no acknowledgement of archaeological value or potential that may be affected by basement proposals. The policy team may wish to reconsider this (even if only as supporting text), particularly as archaeology is a non-designated heritage assets (addressed under policy Q23) [SA RECOMMENDATION 54].**

Places and Neighbourhoods policies PN1 – PN11

- 5C8.25 Policy PN1 on Waterloo should result in significant positive effects on the built and historic environment. The policy promotes and supports development and uses of an appropriate scale and form to reinforce Waterloo's distinct identity, respecting strategic and local views, local contextual considerations, the setting of heritage assets and the Outstanding Universal Value of Westminster World Heritage Site, and ensuring that design quality is worthy of a world city. The provision of cultural facilities and cultural events will be enhanced, particularly in the South Bank area, and a high quality public realm that is durable, well-designed and maintained to reinforce Waterloo's status as a world class centre is promoted.
- 5C8.26 It is considered that policy PN2 for Vauxhall will also result in significant positive effects on SA Objective 8. 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. Existing green spaces and connections to green spaces will be improved.
- 5C8.27 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. New spaces for creative and cultural industries are included in the policy, as are areas for theatre and arts facilities. It is considered the policy positively provides for cultural value and diversity.
- 5C8.28 Similarly, policy PN4 for Streatham supports regeneration that is sensitive to the centres conservation area status and valued heritage assets.
- 5C8.29 It is considered that policies PN5 Clapham, PN6 Stockwell, PN8 Kennington/ Oval, PN9 Herne Hill, PN10 Loughborough Junction and PN11 Upper Norwood 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.

5C8.30 Policy P7 for West Norwood should also result in significant positive effects for SA Objective 8. Taller buildings are supported in specific locations and are proposed to act as focal points and destination. The policy also seeks to support the role and contribution of West Norwood cemetery as a major historic asset and visitor attraction. The policy also recognises locally important views and supports improvements to the public realm.

Summary of draft revised Policies

5C8.31 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is likely that the Draft Revised Lambeth Local Plan October 2018 policies should have significant positive effects on the existing baseline and in protecting, conserving and enhancing areas and buildings for their historic and/or archaeological interest and in the protection of their settings.

Table 21: Summary assessment of effects of 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, protection of existing open space and provision for new open space and green infrastructure. It is therefore considered that the key sustainability issues identified in Table 4 relating to heritage and the built environment are well provided for in the draft Local Plan.</p> <p>The Draft Revised Lambeth Local Plan October 2018 also contains robust policies for the quality of the built environment including urban design of individual developments, public realm, construction detailing and protection and enhancement of amenity values.</p> <p>However, it is considered two areas could be improved with respect to SA Objective 8 – elaboration or clarification of what is expected from ‘well-designed’ housing on small sites; and provision or recognition of non-designated heritage assets and archaeology in the basements policy.</p>	The positive impact of protection, conserving and enhancing 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 non-designated heritage assets. 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

Recommendations for monitoring likely significant effects

5C8.32 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Amount of open space lost through completed planning permissions
- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Number of heritage assets on the ‘at risk’ register

- Number of conservation areas with up-to-date character appraisals
- Infrastructure Delivery Plan updates
- Number of listed buildings within the borough
- Number of registered parks and gardens

5C9. TRANSPORT AND TRAVEL

5C9.1 This section of the SA relates to the sustainability performance of the draft revised Local Plan against:

Objective 9: Integrate 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 use of public transport.

5C9.2 To achieve this objective, plan policies should reduce overall need to travel by improving their access to local services, jobs, leisure and amenities; encourage a modal shift to more sustainable forms of travel: walking, cycling and public transport as well as encourage efficiency (e/g/ car sharing); encourage greater efficiency in the transport network, such as through higher load factors; improve accessibility to work by public transport, walking and cycling; and reduce road traffic accidents, especially involving cyclists.

Relevant policy objectives

National Level

5C9.3 Section 9 of the *NPPF 2018* focuses on promoting sustainable transport. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

Regional Level

5C9.4 Chapter 10 of the *draft London Plan 2018* is on transport. Development Plans and development proposals should support and facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041; and the proposed transport schemes set out in the draft Plan. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Baseline conditions and existing issues

5C9.5 Public transport infrastructure in the borough is generally good for the able bodied but less good for those with disabilities or access needs. There are 14 railway stations evenly spread throughout the borough and nine Underground stations, predominantly in the north. The extension of the Northern underground line extension to Battersea is under construction, which will see a new station opened at Nine Elms in 2020. Accessibility is graded as poor at 8 of the 14 railway stations in the borough (Priorities for rail improvement in Lambeth 2018) and of the nine underground stations only Brixton and Vauxhall are fully step free along with the Jubilee line at Waterloo.

5C9.6 Rail services in the borough are split across four franchises, the terms of which are set by the DfT; South Western, South Eastern, Southern & Thameslink. In addition TfL is responsible for London Overground and Underground services. Over the past 10 years growth in passenger numbers has been strong, although the most recent annual figures show a slight drop (Travel in London Report 10, 2017).

5C9.7 During peak periods rail services in Lambeth are currently at or over capacity, particularly services from Clapham Junction to Waterloo and Herne Hill to Victoria (Existing Baseline Report 2016). Investment is needed to improve conditions for passengers, to provide full access to all stations and to enable the planned increases in resident and working population.

- 5C9.8 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. With bus routes 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.
- 5C9.9 The proportion of households with no car or van increased from 51 per cent in 2001 to 58 per cent in 2011 (Census data ONS). Traffic congestion is a serious concern for residents, with a perception that major roads can divide communities. A network of major cycle routes is in place throughout the borough and this is being expanded every year. There are also a number of off-street walking routes.
- 5C9.10 Lambeth has a low live-and-work ratio: only 28 per cent live and work in the borough. Nineteen per cent of residents commute to Westminster and seven per cent commute to the City (Destinations 2020, Mayor of London August 2010). Nearly 60 per cent of Lambeth workers travel to work by public transport, compared to just 14 per cent nationally.
- 5C9.11 The borough also benefits from river transport, both for passengers and transporting freight. There are two Thames Clipper stations in the borough.
- 5C9.12 The Draft Revised Lambeth Local Plan October 2018 and Infrastructure Delivery Plan 2018 provides details of proposed transport projects that seek to improve transport in the borough. For example, northern line extensions, Vauxhall gyratory and interchange improvements, new high level stations at Brixton and Loughborough Junction and access improvements and platform lengthening at Wandsworth Road and Clapham High Street stations. Funding for some projects remains unknown/uncertain. Indeed delivering of some transport infrastructure projects, particularly in advance of development and associated population growth, can be uncertain.
- 5C9.13 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.

Likely evolution without the draft revised Plan

- 5C9.14 The Lambeth Local Plan 2015 will not be considered up-to-date in 2020 and therefore reliance will be had to policy within the London Plan and NPPF. Opportunities for integrated local transport improvements (including walking, cycling and public transport) and an integrated approach to development may be lost or further deteriorate as a result of increased development or pressure on the transport system or public realm, in the absence of the revised Local Plan. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

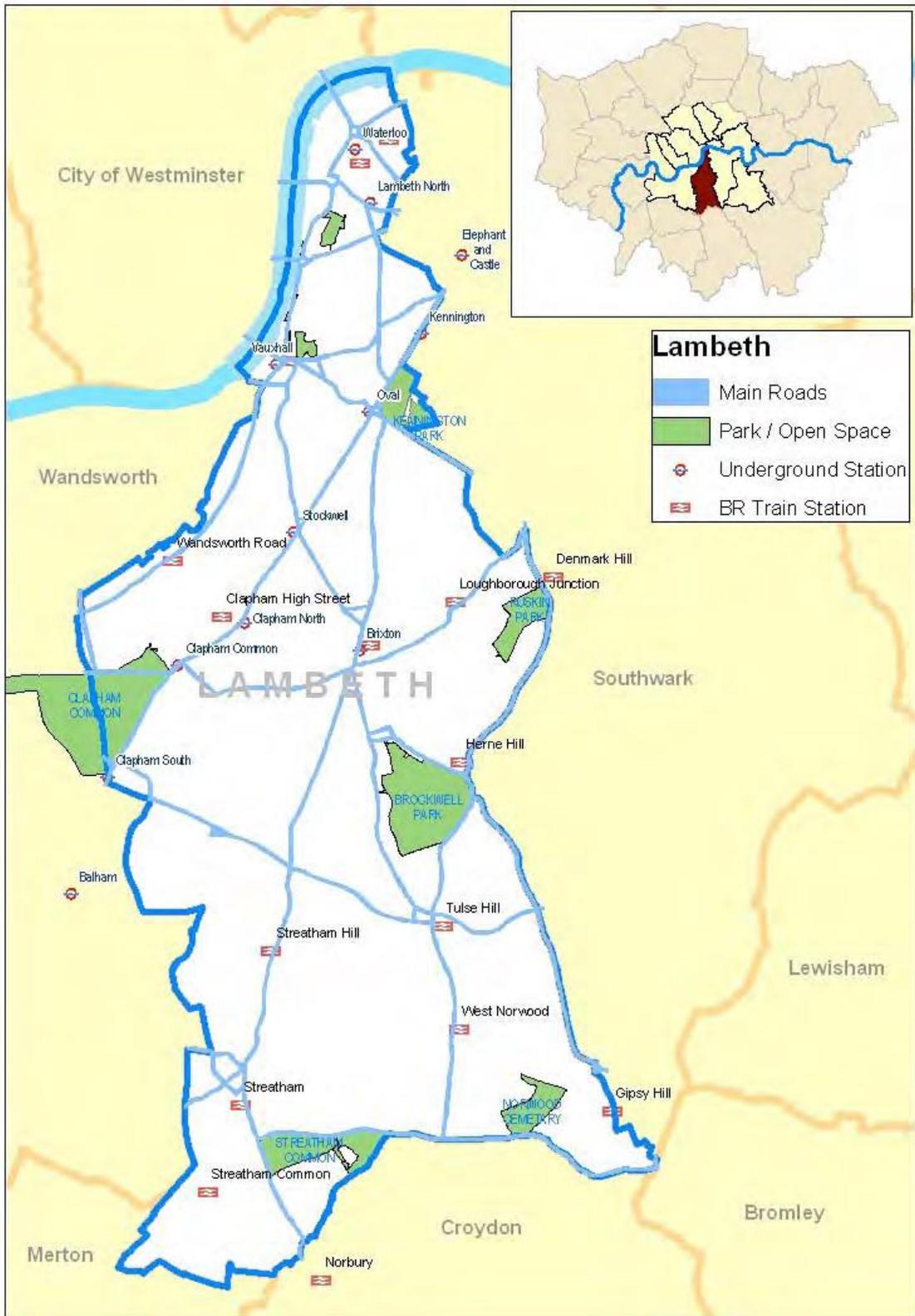


Figure 17: Main public transport provision in Lambeth (excludes new station at Nine Elms to be completed by 2020)

Assessment of draft revised Policies

- 5C9.15 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 9 Transport and Travel. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.
- 5C9.16 The following policies have been screened as having potential for significant effects on this objective:
- | | |
|--|--|
| D1 – Delivery and monitoring | accommodation |
| D2 – Presumption in favour of sustainable development | S2 – New or improved social infrastructure |
| D3 – Infrastructure | S3 - Schools |
| D4 – Planning obligations | T1 – Sustainable travel |
| H1 – Maximising housing delivery | T2 – Walking |
| H7 – Student housing | T3 – Cycling |
| H8 – Housing to meet specific community needs | T4 – Public transport infrastructure |
| H9 – Hostels and houses in multiple occupation | T5 – River transport |
| H10 – Gypsy and Traveller Needs | T7 - Parking |
| H11 – Estate regeneration | T8 – Servicing |
| H13 – Shared living | T9 – Mini-cabs, taxis, private hire vehicles and hail ride |
| ED1 – Offices (B1a) | EN7 – Sustainable waste management |
| ED3 – KIBAs | Q3 – Safety and crime prevention |
| ED4 – Non-designated industrial sites | Q13 – Cycle storage |
| ED5 – Work-live development | PN1 – Waterloo |
| ED6 – Railway arches | PN2 – Vauxhall |
| ED7 - Town centres | PN3 – Brixton |
| ED8 – Evening economy and food and drink uses | PN4 – Streatham |
| ED11 Local centres | PN5 – Clapham |
| ED12 – Markets | PN6 – Stockwell |
| ED13 – Visitor attractions, leisure, arts and culture uses | PN7 – West Norwood |
| ED14 – Hotels and other visitor | PN8 – Kennington / Oval |
| | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and Monitoring policies D1 – D4

- 5C9.17 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 area 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 timely delivery of Northern Line extensions (prior to occupation of new surrounding developments), platform lengthening at Clapham High Street and Wandsworth Road stations and new stations at Brixton and Loughborough Junction, and it is critical public transport capacity and infrastructure keeps pace with increased population resulting from proposed significant growth, including housing.

Housing policies H1, H7 – H13

- 5C9.18 Policy H1 seeks to meet and exceed annual housing targets for Lambeth as set out in the Mayors London Plan. Residential densities will be optimised in accordance with the design-led approach and will have regard to site context, connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL) and the

capacity and quality of provision of surrounding infrastructure. This is commendable, but public transport infrastructure, capacity and accessibility will need to keep pace with population growth and cumulative effects of developments surrounding transport hubs will need to be carefully monitored, to ensure transport hubs/stations do not meet saturation point from the surrounding growth. It will be important for partners and the council to anticipate future demand and plan public transport improvements and capacities accordingly. Funding and timely delivery are areas of uncertainty.

- 5C9.19 Policy H7 provides for student housing which among other criteria, need be located in an area with good public transport access and easy access to local shops, workplaces, services and community facilities. This should result in more positive effects for students, the environment and the road network in terms of attaining SA Objective 9.
- 5C9.20 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'. Unlike policy H7 student housing, there is no guidance (i.e. PTAL rating) on accessibility to local services. Rather the policy states that accessibility needs to be 'appropriate to the needs of the intended occupiers' and accordingly each proposal will be assessed having regard to the PTAL level of the site. In terms of the intended occupiers, it is more likely that occupiers of hostels and HMOs will be more active and mobile than occupiers of nursing-care homes, disabled and learning disabled people and those with mental health issues who require additional support, and therefore hostels and HMOs would likely benefit more from better transport accessibility. Conversely, it is considered more likely that those in need of housing to meet specific community needs (policy H8) will more likely be 'home-bound' and more dependent on visitors for social interactions and engagements. Accordingly SA recommendation 23 on allowing provision for car-parking for visitors is further endorsed.
- 5C9.21 In controlled parking zones (planned or existing) no additional off-street car parking will be allowed for new hostels and HMO proposals. Applicants will need to demonstrate the development will not have an unacceptable impact on parking conditions and traffic congestion in the area. **The policy team may wish to consider adding as supporting text that in order to control parking and traffic congestion the council may decide not to issue residential car parking permits to occupiers where a controlled parking zone is in place, or where existing car-parking provision on the street is at 85% occupancy or above (see policy H6 on residential conversions for comparison) [SA RECOMMENDATION 55].**
- 5C9.22 It is considered that policies H11 estate regeneration and H13 shared living seek to achieve positive effects for SA Objective 9. Estate regeneration schemes will need to demonstrate improved permeability, improved access by walking and cycling and public transport to local amenities and improved walking and cycling routes through the estate. Not only does this achieve positive effects in term of SA objective transport and travel, but also objectives on safety, crime and fear of crime, access and services, and liveability.
- Economic development and town centre policies ED1, ED3 – ED8, ED11 – ED14***
- 5C9.23 Policy ED1 states that outside of specific locations (the major centres), large office development will be supported where the PTAL level is 4 or above. Proposals for smaller offices will be supported in all locations, subject to other plan policies, including transport. This policy on offices, together with policies ED3 KIBAs and ED4 non-designated industrial land maintain a stock of employment generating land in the borough, therefore providing opportunity for some residents to reduce their need to travel outside of the borough for

work. Intensification of industrial sites will need to consider operational requirements (including servicing) and mitigate impacts on the transport network where necessary. Policy ED5 on work/live development provides opportunity for reduced need to travel by allowing a work element together with residential use. Policy ED6 ensures that railway arches are not used for parking. Policy ED7 on town centres provides provision for residential use above ground floor and on other appropriate sites, thereby reducing demand on public transport infrastructure for those residents in accessing daily goods, services, facilities. The policy also supports the vitality and viability of a mix of town centre uses, increasing the likelihood that more residents have access to their everyday needs within the borough, and therefore reducing the need to travel outside the borough and reducing demand on the transport infrastructure. Promoting local economies in town centres supports a 'star and cluster' development approach (rather than traditional 'centre and spoke' form of linear development), that helps reduce the need for people to travel. Proposals for drive-through takeaways will not be supported in any location (policy ED8), thus contributing to reduce trip generation, and improved air quality. Evening and food and drink uses will not be supported where they result in unacceptable harm to neighbouring residential and sensitive use as a result of impact of delivery vehicles/services and traffic generation and impact on traffic flow and road safety (among other things).

- 5C9.24 Like policy ED7, policy ED11 seeks to protect the role of local centres and local shops in meeting the day-to-day needs of communities. These local centres provide good accessibility (either by walking or cycling) to residents for their daily needs and therefore are consistent with the aim of SA objective 9. Visitor attractions, leisure, arts and cultural uses are supported in specific locations in the borough (generally those subject to good public transport accessibility and/or proximity to major centres and any such proposals require a visitor management plan on how the potential impacts of high volumes of visitors will be managed. While not explicitly stated, it is expected that in addition to coach parking, an element of the visitor management plan would also relate to more general travel and transport, including public transport, walking and cycling (travel plans – see policy T1). A visitor management plan is also required for new or extended visitor accommodation. It is noted that planning obligations will be sought to mitigate any negative impacts, including increased demand on local transport facilities and on public services to manage and maintain the public realm. Planning obligation will also be sought for visitor attractions, leisure etc under policy ED13, but only in so far for public realm improvements, particularly route to and from public transport nodes. Arguably visitor attractions attract higher footfalls at specific times (e.g. Oval cricket match days, theatres) generating intensified effects on transport infrastructure and surrounding area for that period of time than visitor accommodation, where people come and go at their leisure. **The policy team may wish to include similar text relating to demand on local transport facilities in policy ED13 as it does in policy ED14 so that planning obligation may be used to improve transport facilities [SA RECOMMENDATION 56].**

Social infrastructure policies S2, S3

- 5C9.25 Policy S2 on new or improved social infrastructure states that 'the site or buildings are appropriate for their intended use and *accessible* to the community' and the supporting text clarifies that new community premises should be conveniently located and easily reached on foot, by bicycle or public transport. Clause (a)(ii) seeks to minimise traffic generation, congestion, parking and negative impacts in road safety. 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. Developments of more than 500 residential units should incorporate childcare provision to meet additional need where this need cannot be met by existing facilities. Similarly, proposals of more than 25 residential units should include appropriate provision of social infrastructure to meet additional need where this need cannot be met through existing facilities. If these are not possible, payment in lieu will be sought. These clauses seek to ensure necessary social

infrastructure is accessible, easily reached by foot or bicycle. This approach seeks to reduce the need for private vehicle transport and integrate new development with sustainable transport choices, which is consistent with achieving SA objective 9.

- 5C9.26 Policy S3 clause (e) states proposals should support sustainable travel, including the need for school travel plans and appropriate road danger reduction measures.

Transport policies T1 – T8

- 5C9.27 Overall it is considered that all transport policies (T1 – T8) 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, maximising trips made by sustainable modes and reducing dependence on the private car. The policy also makes clear that development should contribute toward the improvement of access to public transport and the improvement and delivery of strategic walking and cycling routes that serve the site. While this is desirable, it may not be realistic for all development. **The policy team may wish to amend clause (e) so it applies to major developments, or alternatively add text to the effect that improvements should be relative to the scale [and impact] of development. Also, there may need to be clarification on how this is contributed – through planning obligations, or through actual design. Further guidance is recommended for the supporting text [SA RECOMMENDATION 57].**
- 5C9.28 Clause (g) of policy T1 states that travel plans should be submitted with all major developments to promote sustainable travel and minimise the number of trips by car. **It would be good if travel plans could also address road danger and accident concerns, especially involving cyclists, particularly as the Infrastructure Delivery Plan identifies a significant funding gap for measures to reinforce the borough-wide 20mph speed limit and improve roads/junctions with a high collision rate. Accordingly, the policy team may wish to revisit this clause [SA RECOMMENDATION 58].**
- 5C9.29 Policies T2 and T3 seek to improve conditions for active travel (walking and cycling). SA recommendations 3, 15, 16, 17 and 33 are further endorsed with respect to achieving SA objective 9. Policy T3 provides good provision for changing facilities and associated amenities for cyclists of employment and education uses. **Similar to recommendation 57 made above with respect to policy T1, while commendable, it is considered unrealistic for all development proposals to meet clause (g) of policy T3. Perhaps clarification is needed that it applies to major developments only, or new text is added to the effect that such improvements are relative/proportionate to the scale of development. It is recommended the policy team revisit this clause/supporting text [SA RECOMMENDATION 59].**
- 5C9.30 **Policy T4 clause (a) may benefit from adding the words ‘where appropriate’ following the word ‘projects’ for clarification purposes, and for the policy to be realistic. Clause (e) perhaps should only realistically apply to major developments. The policy team may wish to revisit this clause [SA RECOMMENDATION 60].**
- 5C9.31 Policy T5 provides for river transport and policy T6 is on parking, whereby the council will apply London Plan parking policy T6 to promote a reduction in car ownership and private car trips. For residential schemes the policy promotes less car parking for sites in areas of PTAL 2 and 1 than what the London Plan allows.
- 5C9.32 Overall it is considered that the transport policies should achieve significant positive effects with respect to SA objective 9, with the above SA recommendations largely limited to clarifications.

Environment policy EN7

- 5C9.33 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 London Plan policy S18 and national waste planning policy which includes transport and environmental impacts of all vehicle movements related to the proposal (and local plan policy T8 on servicing will also apply for waste vehicles).

Places and neighbourhoods policies

- 5C9.34 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, healthcare, housing, services and shopping. The policy also supports reducing traffic and supporting better conditions for walking and cycling throughout Waterloo alongside improvements in capacity, accessibility and interchange quality at Waterloo station. Improvements in capacity will be necessary with projected population growth. Funding to reconfigure Waterloo City Hub and Water Road junction to allow for new open space, new bus station, new direct links from Station to South Bank and upgrades to adjoining streets – considered critical to develop Waterloo as a Business District and overcome historic issues of severance and poor public realm – has been secured and the project should be implemented by 2020. Traffic management measures to deter unnecessary car trips and innovative measures to reduce the impact of freight and construction will be promoted, including increased use of the Thames. Overall it is considered that policy PN1 will result in positive effects on SA Objective 9.
- 5C9.35 Similarly, policy PN2 for Vauxhall maximises the potential of its location by supporting a range of mixed uses including retail, employment, housing, strategically important hotels, leisure, entertainment and other creative, cultural and community uses that will enable reduced need to travel. Additionally, the policy seeks to improve the transport experience by reducing the dominance of road traffic, increasing public transport capacity and maximising opportunities to walk and cycle safely. It is proposed that the bus station will be remodelled and the gyratory will be removed by 2022, thereby improving public realm, connectivity and more simplified road junctions and crossings for walkers, cyclists, public transport users and motorists alike. Overall, it is considered that policy PN2 has potential for significant positive effects on SA Objective 9. However, delivery of necessary transport infrastructure *ahead* of projected growth in this area is uncertain/unlikely; funding for complementary related improvements to the adjacent area of the Vauxhall gyratory works to improve access, public realm and environmental quality is not secured.
- 5C9.36 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 improvements in provision for pedestrian movement and cyclists; improved linkages within the town centre and connections with adjoining areas and traffic reduction and initiative to reduce harmful emissions. Clause (f) seeks further improvements in the quality and connectivity of public transport such as a refurbished mainline train station, working with TfL to open a rear entrance to Brixton Underground station on Electric Lane; delivering a cycle parking hub near the tube station, and exploring opportunities to locate a new Overground station in the area. Clause (j) sets out detail on redeveloping the land that includes the mainline train station. The policy promotes sustainable forms of travel and will reduce the need to travel by local people. However an opportunity to maximise positive effects on SA Objective 9 may be lost/delayed if funding cannot be secured for the Brixton Rail Station upgrade.
- 5C9.37 Sustainable travel, accessibility and use of public transport, walking and cycling are all supported in Streatham through improvements to the public realm and public transport

facilities and measures to reduce the impact and dominance of road traffic and improve air quality. As a major centre, Streatham also capitalises on its function as a town centre by encouraging mixed use developments. Funding has been secured for the Streatham High Road Phases 5&6 - delivery of public realm, walking and cycling improvements between Sternhold Avenue and South Circular, with implementation expected for 2021. However there is funding gap to improve Streatham station access – a station which has experienced significant passenger growth over the last 10 years.

- 5C9.38 Policy PN5 for Clapham supports enhancements to the public realm of the town centre to improve the environment for pedestrians and cyclists an. This should encourage more active travel and greater efficiency of the transport network on improve linkages though the town centre, across the high street and between the town centre and Clapham Common MOL. SA recommendation 10 relating to clauses (e) and (g) made against SA objective 1 are further supported here with respect to SA objective 9. **The policy team may wish to consider mentioning the specific aspiration to lengthen the platform to accommodate longer trains at Clapham High Street, as this is a project identified in the Infrastructure Delivery Plan and Draft Revised Lambeth Local Plan October 2018 policy T4 [SA RECOMMENDATION 61].**
- 5C9.39 Policy PN6 for Stockwell seeks to develop and enhance its sense of place by improvement to traffic and environmental conditions for pedestrians and cyclists. West Norwood policy supports its role as a vibrant district centre offering a range of uses, including protection of Lambeth's largest industrial area (KIBA), thereby reducing need to travel for some local residents. Public realm improvements around transport nodes are also supported. Policy PN8 for Kennington and Oval seeks improvement of traffic, air quality and environmental conditions for pedestrians and cyclists, the quality of the public realm and linkages between Kennington Park and other spaces and the shopping frontages in Clapham Road and Brixton Road. **Given the regeneration proposed for the gasworks site, perhaps the policy should also promote public realm improvements and conditions for pedestrians and cyclists in this area too, particularly towards tube stations [SA RECOMMENDATION 62].**
- 5C9.40 Herne Hill policy PN9 supports further improvements to the quality of the public realm, convenient linkage between the station and adjoining areas, improvements to the station and improving walking and cycling links to the area. Policy PN10 on Loughborough Junction has a significant focus on opening up key routes, enhancing new and existing walking and cycling routes and improving public realm and accessibility of the area. It also seeks to explore the potential for a new station stop on the London Overground, and reduce the number of people driving through the Loughborough Junction area. It is considered the policy seeks to maximise positive effects on SA Objective 9.
- 5C9.41 The policy for Upper Norwood supports the extension of the Tramlink to Crystal Palace, although it is noted this is proposed to be removed from local plan policy T4 as part of the Local Plan Review. The policy team may wish to clarify this point.
- 5C9.42 On balance, it is considered the places and neighbourhoods policies seek to improve traffic and environmental conditions for pedestrians and cyclists, linkages between stations and adjoining areas, work with partners to deliver transport projects and maximise public transport use and accessibility by encouraging mixed use developments in town centres. It is considered that the places and neighbourhoods policies effectively contribute to attaining SA Objective 9.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C9.43 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is likely that the Draft Revised Lambeth Local Plan October 2018 will have significant positive effects albeit with some level of uncertainty on improving baseline public transport use; and reducing the need to travel by integrating planning and transport decision.

Table 22: Summary assessment of effects of 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
Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	+/?	++/?	<p>On the whole it is considered that the Draft Revised Lambeth Local Plan October 2018 has been produced with the premise of sustainable patterns of urban development actively borne in mind. Growth areas 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 higher 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>Taking into account SA recommendations made in this section together with SA recommendations made previously on safety and improving health (against SA objectives 1 and 2) should result in significant positive effects with regard to SA objective 9.</p> <p>However, while the Draft Revised Lambeth Local Plan October 2018 in theory 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, and public realm improvements to facilitate active travel through identified and committed funding sources (for example a new</p>	<p>Comprehensive achievement of this objective will more likely be evident in the longer term as larger scale transport developments are completed or funding is secured, for example Brixton Station improvements, platform lengthening at Clapham High Street and Wandsworth Road stations, Overground stations at Brixton and/or Loughborough Junction.</p> <p>Positive effects from more local measures or where funding is secured are more likely to be evident in the short to medium term, for example Vauxhall and Tulse Hill gyratory removal, local walking, cycling, public realm improvements.</p> <p>The draft Local Plan is reliant on the delivery of improved public transport infrastructure and that infrastructure keeping pace with population growth and demand. The extension of the northern line to Nine Elms will be delivered by 2020, however developments have and are already being completed in the area, meaning that delivery of the infrastructure lagged behind occupation of developments, resulting in short-term adverse effects for occupiers. Stage 2 of the northern line extension requires increased</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/mitigated 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 but it is recognised that capacity levels will need to be regularly reviewed and improved thereafter as necessary.</p>

			<p>station at Brixton / Loughborough Junction for London Overground line, Brixton Rail Station upgrade, improved walking, cycling and public realm benefits in Brixton – particularly to facilitate cycling, implementation of Healthy Routes Network project (all of which have significant funding gaps), Waterloo Public Realm Project, the timely delivery of the northern line extension to Nine Elms (completion expected 2020), and increased capacity of trains on northern line). There are also significant funding gaps for the road danger reduction project, which is a key barrier to the uptake of walking and cycling; a barrier also to effectively achieving sustainable growth.</p>	<p>capacity of trains. To maximise sustainability outcomes and enable sustainable lifestyles and achievement of SA Objective 9 infrastructure needs to keep pace and ahead of growth before occupation areas.</p> <p>Currently there is no commitment to the necessary funding for a new station at Brixton or Loughborough Junction for the London Overground. Similarly there is no funding currently in place for refurbishments to provide step-free access and safer and improved user experience at Brixton Rail Station. It is uncertain if or when these will be delivered.</p> <p>Infrastructure Delivery Plan of the draft Local Plan sets out expected timescales for infrastructure delivery.</p>	
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Recommendations for monitoring likely significant and uncertain effects

5C9.43 It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Modal Share – walking, cycling and public transport
- Number of cycle parking spaces provided in completed major developments
- Number of disabled parking spaces per completed major development
- Infrastructure Delivery Plan updates

5C10. BIODIVERSITY

5C10.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

Objective 10: To protect, enhance and promote biodiversity, and bring nature closer to people.

5C10.2 To achieve this objective, plan policies should protect and enhance habitats and species and provide for the long-term management of natural habitats and wildlife; improve the quality and extent of designated and non-designated sites; 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; bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens; provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats); improve access to areas of biodiversity interest; enhance the ecological function and carrying capacity of the green space network; and promote a network of green infrastructure.

Relevant policy objectives

International Level

5C10.3 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

5C10.4 Section 15 of the *National Planning Policy Framework 2018* 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, sites of biodiversity or geological conservation values and soils; recognising the wider benefits from natural capital and ecosystem services; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Regional Level

5C10.5 Policy G6 of the *draft London Plan (2018)* covers Biodiversity and access to nature. It states Sites of Importance for Nature Conservation (SINCs) should be protected. Boroughs should use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks. Areas of deficiency in access to nature should be identified, and opportunities sought to address them. The policy supports protection and conservation of priority species and habitats that sit outside of the SINC network, and promotes opportunities for enhancing them using Biodiversity Action Plans.

Local Level

5C10.6 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. The Biodiversity Action Plan is being updated in 2018/19.

5C10.7 The council has undertaken a review of its 48 SINC's for the Local Plan review, and this has resulted in the following recommendations:

- 1 x Metropolitan Grade SINC is retained;
- 1 x extension to Tooting Bec Metropolitan SINC within Lambeth;
- 23 x Borough Grade SINC's are retained;
- 1 x Local Grade SINC, Norwood Park, proposed to be upgraded to a Borough Grade SINC;
- 23 x Local Grade SINC's are retained;
- 18 x boundary changes are adopted to either incorporate or remove land (or both);
- 2 x currently non-SINC sites are proposed to be graded as Borough SINC's; and
- 1 x currently non-SINC site is proposed to be graded as a Local SINC.

The recommendations will have the following key changes to the SINC series and policy environment in Lambeth:

- a decrease in Areas of Deficiency in Access to Nature in two locations as a result of Norwood Park being upgraded to a borough SINC and the extension and improved access to Roots and Shoots Borough SINC in the north;
- three new SINC's represent an additional area of 6.8ha;
- 2.6ha of land (over eight existing SINC's) will be removed as part of boundary change proposals;
- 18.8ha of land (over 15 existing SINC's) will be added as part of the boundary change proposals; and
- minor corrections to existing SINC boundaries as a result of digitising errors accounts for 0.5ha removed and 1.2ha added across all sites.

Baseline conditions and existing issues

5C10.8 Lambeth has identified ten priority habitats and seven priority species for the borough. There are currently 48 designated Sites of Importance for Nature Conservation (SINC's) and the SINC review recommends another three sites for SINC designation. Several bat records from Vauxhall Pleasure Gardens in 2013 suggest the open space may have some value as commuting or foraging resource. Hedgehogs are a London and Lambeth Priority Species, with numbers falling due to habitat fragmentation and availability of food. Lambeth appears from these records to have several hedgehog hotspots, located around Norwood Park, Tulse Hill and Brockwell Park.

Likely evolution without the draft revised Plan

5C10.9 Without the Draft Revised Lambeth Local Plan October 2018, the Lambeth Local Plan 2015 will be out-of-date by 2020 and the council would need to rely on the provisions of the London Plan, and the habitat and species action plans within the Lambeth Biodiversity Action Plan. The Draft Revised Lambeth Local Plan October 2018 includes review of SINC's and the findings of this review would not be reflected in the development plan for the borough. 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 Draft Revised Lambeth Local Plan

October 2018 development may occur in areas that may disproportionately exacerbate issues for biodiversity. Developers will still need to comply with legislation protecting biodiversity, for example Wildlife and Countryside Act.

Assessment of draft revised Policies

5C10.10 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 10 Biodiversity. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft revised Plan on the objective. This review takes account of mitigation already included within the draft revised Plan.

5C10.11 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	Q10 - Trees
D2 – Presumption in favour of sustainable development	Q11 – Building alternations and extensions
D3 – Infrastructure	Q14 – Development in gardens
D4 – Planning obligations	Q15 – Boundary treatments
D5 – Enforcement	PN1 – Waterloo
H1 – Housing growth	PN2 – Vauxhall
H5 – Housing standards	PN3 – Brixton
T5 – River transport	PN4 – Streatham
EN1 – Open space	PN5 – Clapham
EN2 – Local food growing and production	PN6 – Stockwell
EN4 – Sustainable design and construction	PN7 – West Norwood
EN6 – Sustainable drainage systems and water management	PN8 – Kennington / Oval
Q9 – Landscaping	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and Monitoring policies D1 – D5

5C10.12 In terms of biodiversity impacts, policy D1 that seeks to optimise 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 impacts on such species and habitats. Measures such as brown roofs replicate brownfield environments. Growth, and physical infrastructure required to support such growth, can result in significant adverse effects upon local biodiversity unless appropriate avoidance and mitigation measures are implemented. Provision of green infrastructure may help to mitigate impacts on biodiversity. The Local Plan also contains policies to protect biodiversity, and conditions are normally 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 provided and, 'mitigation of impacts on and/or enhancements of biodiversity and wildlife habitats' is included within policy D4.

5C10.13 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.

Housing policy H1, H5

5C10.14 The significant number of new dwellings proposed for the borough has potential to adversely impact on biodiversity and open spaces. Policy H1 supports delivery of new homes on small sites, as well as all suitable and available brownfield sites.

However, other policies (for example EN1, Q9, Q14) actively seek to protect biodiversity and designated open spaces and create new open space in areas that are deficient in open space. It is estimated that about 20% of Lambeth is covered in private gardens. Policy H5 and other design policies (such as Q14) seek to retain a minimum garden coverage (houses, ground-floor flats and family-sized units should preferably have direct access to a private garden) and communal amenity space provided should incorporate sustainable landscape principles and practices, including promotion of biodiversity.

Transport policies T5, T2 T3

- 5C10.15 This policy seeks to protect biodiversity of the River Thames where there are proposals for new piers or improvements to existing piers. Other transport policies such as T2 and T3 on walking and cycling seek to create environments conducive for increased active travel. A common way to achieve this is through the provision of 'green corridors' or 'greenways' – effectively greening streets and routes to make them more enjoyable to use for active travel. A secondary effect of this is that such green infrastructure also provides corridors for species to use and migrate along, and thus offers biodiversity benefits.

Environment and green infrastructure policies EN1, EN2, EN4, EN6

- 5C10.16 Open space is defined in supporting text paragraph 9.1 and it includes protecting and maintaining a wide range of parks and open spaces, including communal squares and gardens. **It is recommended that the second to last sentence of para 9.1 is amended to include reference to biodiversity. Possible suggested text as follows: 'Public and private open space is protected for its value in providing space for leisure, recreation and sport, habitats and species, and for its contribution to visual amenity and ecological function [SA RECOMMENDATION 63].** This amendment provides more appropriate supporting text to policy EN1(b), (c) and (e). Overall it is considered that policy EN1 will result in positive effects on the achievement of SA objective 10, particularly clauses (b) and (c) provided clause (c) is actively implemented at planning application stage for all development proposals. Application of the urban greening factor in major developments should help significantly increase the amount of greenery provided in development proposals. Again, the degree and extent of positive effects on local biodiversity and ecological network relies on the rigour on which the policy is implemented at planning application stage.

- 5C10.17 Policy EN2 on local food growing and production supports local biodiversity and provides opportunity to bring nature closer to people. 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 (in line with EU legislation).

- 5C10.18 Policy EN4 states all development is required to meet high standards of sustainable design and construction feasible. Development is also required to be resilient to climate change, which includes provision of green infrastructure (such as living roofs and walls) and makes a contribution to enhancing and promoting biodiversity in the borough and bringing nature closer to people.

- 5C10.19 It is considered that policy EN6 on sustainable drainage systems and water management should result in positive effects for biodiversity.

Quality of built environment policies Q9 - Q10, Q13 - Q15

- 5C10.20 Overall it is considered that positive effects on biodiversity should result from policy

Q9 on landscaping. As previously mentioned, the degree and extent of positive effects on local biodiversity will rely on the rigour on which the policy is implemented at planning application stage and delivery. Policy Q9 contains 11 clauses that landscaping should achieve. It is uncertain whether in considering planning applications, development management ensures each clause is met/addressed, or whether most or even just meeting some clauses are considered acceptable. Some of the clauses are considered more biodiversity 'targeted' than others (for example clauses (ii) – (iv) compared to say clauses (ix) – (xi)). **To maximise positive impact of landscaping on biodiversity, they may be scope to strengthen supporting text in relation to expectations on biodiversity enhancement. Alternatively supporting text could be strengthened to state that applications should demonstrate consideration of all aspects of the policy in their landscaping proposals. Perhaps all that is needed is to add to the last sentence of supporting text para 10.30 the following: '...and policy EN1 in relation to green infrastructure and biodiversity'. The policy team may wish to revisit this policy and its supporting text in light of these comments against SA objective 10 [SA RECOMMENDATION 64].**

- 5C10.21 Policy Q9(iii) mentions existing designated habitats. **Clarification is sought on what the designated habitats are. Are they SINCs? Or should the policy refer to priority habitats, to make the policy more consistent with wording in the biodiversity action plan [SA RECOMMENDATION 65].**
- 5C10.22 Supporting paragraph 10.32 states that all planning applications for residential development, including those that form part of a mixed-use scheme, should be supported by a landscape design scheme and a management/maintenance programme. Policy Q9 applies to all development proposals. Accordingly it is considered that all applications should be supported by a landscape design scheme. For example it is reasonable that commercial, employment, educational and community uses provide useable and functional landscaping that is maintained for the lifetime of the development. **It is recommended that the policy team revisit this paragraph of supporting text so that all applications are supported by a landscape design scheme and management/maintenance programme [SA RECOMMENDATION 66].**
- 5C10.23 Policy Q10 on trees contributes to the achievement of SA objective 10. Policy Q11 on building alterations and extensions further supports policy EN1 by stating that living roofs will generally be supported (but are unlikely to be considered appropriate on heritage assets where they would lead to a loss of locally distinctive roof forms or introduce built forms which are discordant).
- 5C10.24 Policy Q13 (b) (iii) states that in considering small-scale flat conversions and intensification of use the council will support cycle storage in front gardens/forecourts only where it does not compromise visual amenity or access. The Lambeth Biodiversity Action Plan (BAP) identifies gardens as a priority habitat for the borough and does not differentiate between, rear, front, side or corner gardens. The London BAP also identifies private gardens as priority biodiversity habitat. Gardens are also identified as open space under policy EN1. **In the interests of SA Objective 10, it is considered that cycle storage areas should not compromise biodiversity of front gardens, in addition to the visual amenity and access. It is further considered this better aligns with policy Q14 – development in gardens which takes account of biodiversity values. The policy team may wish to revisit this aspect of policy [SA RECOMMENDATION 67].**
- 5C10.25 Overall it is considered that policy Q14 on development in gardens and on previously

developed rear land with no street frontage should result in positive effects on SA Objective 10. **Clause (b)(i) could be improved with respect to biodiversity if it were amended as follows: ‘there would be no harm to the visual amenity or biodiversity value’.** This amendment recognises that gardens (regardless of location - front, rear, corner or side) are priority habitats under the borough and London Biodiversity Action Plans. Clarification is also sought of what is a tree of ‘value’ (clause (a)) [\[SA RECOMMENDATION 68\]](#).

Places and Neighbourhoods policies PN1 – PN11

5C10.26 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 land use 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. 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, air quality 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. However, it is recognised that policy EN1 makes provision for living roofs and the policy will apply to all proposals within the places and neighbourhoods boundaries.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C10.27 Overall, and taking into account the criteria outlined in the Sustainability Framework it is likely that the Draft Revised Lambeth Local Plan October 2018 policies will have a significant positive effect on maintaining and enhancing existing baseline conditions on biodiversity. It is considered that the Draft Revised Lambeth Local Plan October 2018 seeks to protect and enhance biodiversity, and bring nature closer to people while improving access to these areas where possible.

Table 23: Summary assessment of effects of 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 protect and enhance biodiversity and to bring nature closer to people	+/?	++/?	<p>Taking into account existing baseline conditions of biodiversity, it is considered that the Draft Revised Lambeth Local Plan October 2018 generally provides well for SA objective 10 and significant positive effects are anticipated, provided policies are fully implemented at decision-making of applications. Application of the urban greening factor is anticipated to result in significant positive effects on biodiversity. Policy EN1 ensures no harm to biodiversity value of opens spaces regardless of whether they are designated or not. There is also a much more prevalent political and social push towards improving air quality, and provision of green infrastructure is one good way of achieving this – a positive impact also for biodiversity. Accordingly there is potential for positive cumulative and synergistic effects on biodiversity in the predominately urban existing environment, as policies EN1, Q9, Q14, places and neighbourhoods policies (for example Vauxhall) promote creation of new habitats and creating better connections between spaces. It is considered that the Draft Revised Lambeth Local Plan October 2018 provides the appropriate policy context for protecting and enhancing biodiversity and bringing nature closer to people.</p> <p>The uncertainty lies in the delivery of the biodiversity-related policies and the extent and degree of rigour on which they are applied, taking into account all facets of planning policy that are weighed and considered in making decisions on planning applications. It will also be important that biodiversity and provision of green infrastructure is considered very early in the design process – i.e at pre-application stage.</p> <p>The initial Habitat Regulations Assessment (HRA) – Screening Report concluded that the Draft Revised Lambeth Local Plan October 2018 will</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 can 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 might be evident in the medium to long terms as developments and public realm projects are completed but it is recognised that finding land for new provision of open spaces, particular large open spaces is unlikely. Provision of green infrastructure is increasingly important for biodiversity.</p> <p>Construction effects may temporarily affect biodiversity in some locations (for example reuse of vacant buildings, development of brownfield sites); 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 new development (for example through living roof, bat</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>

			not result in any likely significant adverse effects on any European Site. Similarly, it found the Draft Revised Lambeth Local Plan October 2018 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 Draft Revised Lambeth Local Plan October 2018 for Lambeth Borough. The initial HRA screening report is currently subject to consultation alongside this SA (including Natural England) and the Draft Revised Lambeth Local Plan October 2018.	boxes).	
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Recommendations for monitoring likely significant and uncertain effects

5C10.28 It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Change in areas of biodiversity importance
- Amount of open space lost through completed planning permissions
- Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)
- The achievement of BAP targets
- The change in area and condition of BAP habitats/species
- The change in area of Sites of Importance for Nature Conservation
- Percentage of borough by area located in an access to nature deficiency area

5C11. GREEN INFRASTRUCTURE

5C11.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

Objective 11: To create, manage and enhance green infrastructure.

5C11.2 To achieve this objective, plan policies should protect existing green infrastructure and open spaces; enhance/create good quality and accessible green infrastructure or open spaces; and promote increased access to green infrastructure where appropriate.

Relevant policy objectives

National Level

5C11.3 The NPPF 2018 defines green infrastructure as 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'. Accordingly the NPPF recognises the value of green infrastructure in its policies regarding healthy lifestyles (para 91), air quality (para 181), planning for climate change (para 150), conserving and enhancing the natural environment (para 171) and well-designed places (para 127).

Regional Level

5C11.4 Chapter 8 of the *draft London Plan (2018)* is on green infrastructure and natural environment. However like NPPF, draft London Plan recognises the benefits on green infrastructure to a number of policy areas, including policy GG2 (best use of land), GG3 (healthy city), D2 (design), D7 (public realm), SI4 (managing heat risk), SI10 (aggregates), and SI13 (sustainable drainage). It also recognises the economic value of green infrastructure through supporting text on planning obligations policy. Policy G1 of the draft London Plan is specifically on green infrastructure and states that London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure. Policy G4 on urban greening factor will significantly contribute to increasing green provision in London.

Local Level

5C11.5 The *Lambeth Green Infrastructure Strategy* seek to provide a framework for green infrastructure planning and delivery that takes account of climate change and the predicted increased in population density. It sets out an approach for managing, enhancing and creating new open space and other forms of green infrastructure in Lambeth.

Baseline conditions and existing issues

5C11.6 The total area of open space in Lambeth is just less than 844 hectares, representing 31 per cent of the area of the borough. With population increases since 2001, the amount of unrestricted open space per head of population has been reducing and in 2011 stood at 1.48 hectares per 1000 people (Lambeth Green Infrastructure Strategy Update 2018).

In 2016, Greenspace Information for Greater London (GiGL) prepared maps of deficiency for three different types of open spaces (local, small and pocket parks; district parks and metropolitan parks) in the borough. This identified that around one third of the borough, generally areas focused around large open spaces had sufficient access to the three types of open spaces but 2% of the borough was

deficient in access to all categories of open spaces – in locations near King’s College Hospital, Kennington and West Norwood (Lambeth Green Infrastructure Strategy Update 2018).

Likely evolution without the draft revised Plan

- 5C11.7 Without the Draft Revised Lambeth Local Plan October 2018, the Lambeth Local Plan 2015 will be out-of-date by 2020 and the council would need to rely on the provisions of the London Plan. Protection or consideration of green infrastructure may be lost at the local scale, for example, development in gardens, boundary treatment. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council’s ability to guide and shape investment and development will be significantly diminished.

Assessment of draft revised Policies

- 5C11.8 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 11 Green Infrastructure. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft revised Plan on the objective. This review takes account of mitigation already included within the draft revised Plan.

- 5C11.9 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	Q6 – Urban design public realm
D2 – Presumption in favour of sustainable development	Q7 – Urban design new developments
D3 – Infrastructure	Q9 – Landscaping
D4 – Planning obligations	Q10 - Trees
D5 – Enforcement	Q14 – Development in gardens
H1 – Housing growth	Q15 – Boundary treatments
H5 – Housing standards	PN1 – Waterloo
H11 – Estate regeneration	PN2 – Vauxhall
T2 – Walking	PN3 – Brixton
T3 – Cycling	PN4 – Streatham
T7 - Parking	PN5 – Clapham
EN1 – Open space	PN6 – Stockwell
EN2 – Local food growing and production	PN7 – West Norwood
EN4 – Sustainable design and construction	PN8 – Kennington / Oval
EN6 – Sustainable drainage systems and water management	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and Monitoring policies D1 – D5

- 5C11.10 Policies D3 and 4 on infrastructure and planning obligation make direct reference to green infrastructure. Planning obligations may be spent on green infrastructure (among a long list of other possibilities. Education and awareness raising will help planners understand that provision of green infrastructure is multi-beneficial/functional – it also improves local walking and cycling (clause v), plays a role in sustainable drainage systems (clause xvii) and other sustainable measures (clause xxi) of policy D4. However **to be beneficial green infrastructure needs to be considered at the initial stages of planning and design, at pre-application discussions. Accordingly, it is considered that supporting text para 4.8 of policy D2 could be improved to acknowledge this. Initial advice should also be sought from the sustainability team and/or tree officer, and statutory partners like Natural England. The policy team may wish to consider adding this to para**

4.8 [SA RECOMMENDATION 69]. This amendment would also appropriately support supporting text para 9.9.

5C11.11 As highlighted previously (in the appraisal against SA Objective 7 and further endorsed under SA Objective 10) there is some concern, particularly regarding cumulative impacts on green infrastructure with the policy approach of policy D5 Enforcement.

Housing policy H1, H5, H11

5C11.12 The significant number of new dwellings proposed for the borough has some potential to adversely impact existing green infrastructure. Policy H1 supports delivery of new homes on small sites, as well as all suitable and available brownfield sites. However, new development, in particular major developments provide opportunity for increased green infrastructure provision, as policy EN1(f) applies an urban greening factor to all major developments, and encourages all other developments to include urban greening measures. Similarly other policies (for example EN1 (a) and (d), Q9, Q14) actively seek to protect greenery, biodiversity and designated open spaces and create new open space in areas that are deficient in open space. It is estimated that about 20% of Lambeth is covered in private gardens. Policy H5 and other design policies (such as Q14) seek to retain a minimum garden coverage (houses, ground-floor flats and family-sized units should preferably have direct access to a private garden) and communal amenity space provided should incorporate sustainable landscape principles and practices, including promotion of biodiversity.

5C11.13 Given the area of land affected and the comprehensive redesign involved in estate regeneration schemes (and taking into account such schemes are normally subject to pre-application discussions – (see para 11.10 above); **it would be useful for either policy H11 or its supporting text to make reference to green infrastructure [SA RECOMMENDATION 70].** Green infrastructure can help achieve clause (h) of the policy. Recognition of green infrastructure in the policy also reminds applicants and planners that green measures help create places that people want to be in and be proud of (arguably this is needed more for estate regeneration than other types of schemes). Trees and other green measures promote social and health and well-being benefits, and again it that may be argued that this is even more important for occupiers of estate regeneration schemes. The policy team may therefore wish to consider making reference to green infrastructure in the policy or supporting text.

Transport policies T2, T3, T6

5C11.14 Policies T2 and T3 on walking and cycling seek to create environments conducive for increased active travel. This includes creating places that are safe, attractive and enjoyable. SA recommendation 17 on including the word 'healthy' is further supported with respect to SA Objective 11. An easy way to achieve safe, healthy and attractive walking and cycling routes is through the provision of green infrastructure. Supporting text para 8.10 makes mention of 'street trees'. This is one form of green infrastructure, but there are many other different forms. **It is considered that the policy or supporting text should make reference to green infrastructure, particularly recognising green infrastructure as a network that has multi-faceted benefits with respect to social, economic and health objectives [SA RECOMMENDATION 71].** Such amendment would also more appropriately support policy E1(d)(iii).

5C11.15 **The policy team may wish to consider adding that all outdoor and open parking areas (policy T7(e)(v)) contain an element of green infrastructure to help offset**

effects of vehicle emissions [SA RECOMMENDATION 72].

Environment and green infrastructure policies EN1, EN2, EN4, EN6

- 5C11.16 Policy EN1 seeks to protect and maintain both open spaces and green infrastructure (clause (a)). It also seeks to increase quantity of open space and green infrastructure ((clause (d)). Clause (e) seeks to improve quality of and access to, existing pen space and green infrastructure, while clause (f) states that London Plan policy G5 n urban greening factor will be applied to major developments. It is considered that the urban greening factor should result in significant positive effects on the quantity of green infrastructure provision in the borough, provided this is appropriately conditioned into decisions on planning application. Like identified in the analysis against SA objective 10 on biodiversity, the degree and extent of positive effects for green infrastructure network relies on the rigour on which the policy is implemented at planning application stage, delivered upon completion and maintained and managed thereafter.
- 5C11.17 Policy EN2 on local food growing and production contributes to the provision of green infrastructure in the borough, and enables access to green infrastructure.
- 5C11.18 Policy EN4 states all development is required to meet high standards of sustainable design and construction feasible. Development is also required to be resilient to climate change, of which an obvious mechanism is through provision of green infrastructure (such as living roofs and walls) and makes therefore facilitates achievement of SA objective 11.
- 5C11.19 It is considered that policy EN6 on sustainable drainage systems and water management should result in positive effects for green infrastructure provision.

Quality of built environment policies Q6, Q7, Q9 - Q10, Q14, Q15

- 5C11.20 **The policy team may wish to consider amending policy Q6 (v) to say ‘green infrastructure’ instead of ‘landscaping/trees’, or they may wish to somehow refer to green infrastructure within the existing text.** This may help better achieve a network of green spaces in a more co-ordinated strategic way, rather than piecemeal planting. Landscaping and trees are two forms of green infrastructure. There are also other forms. **The policy team may wish to also include reference to policy EN1 in supporting text para 10.24 [SA RECOMMENDATION 73].**
- 5C11.21 It is considered that there is opportunity in policy Q7 urban design - new developments to incorporate and/or integrate the natural environment into designs, particularly given the wide-ranging benefits green infrastructure offers (e.g. improved air quality, managed heat island effect, drainage management, health and well-being, sense of place and pride, economic values, property values). It is noted that supporting text para 10.26 refer to policy EN4. **It is recommended it also refers to policy EN1. It is further recommended that the policy team consider how green infrastructure can be promoted in policy Q7 [SA RECOMMENDATION 74].** It is recognised that the urban greening factor will apply to all major developments.
- 5C11.22 Overall, policies Q9 and Q10 should result in positive effects for green infrastructure provision in the borough. **Where new trees are planted in new developments (Q10(f)) it should be in a co-ordinated way that maximises the green infrastructure network, wherever possible. The policy team may wish to consider amending the clause to reflect this [SA RECOMMENDATION 75].**
- 5C11.23 Supporting paragraph 10.32 states that all planning applications for residential

development, including those that form part of a mixed-use scheme, should be supported by a landscape design scheme and a management/maintenance programme. Policy Q9 applies to all development proposals. Accordingly it is considered that all applications should be supported by a landscape design scheme. For example it is reasonable that commercial, employment, educational and community uses provide useable and functional landscaping that is maintained for the lifetime of the development. SA recommendation 66 is further endorsed with respect to SA Objective 11.

- 5C11.24 Policy Q11 on building alterations and extensions further supports policy EN1 by stating that living roofs will generally be supported (but are unlikely to be considered appropriate on heritage assets where they would lead to a loss of locally distinctive roof forms or introduce built forms which are discordant).
- 5C11.25 Overall it is considered that policy Q14 on development in gardens and on previously developed rear land with no street frontage should result in positive effects on SA Objective 11. Policy Q15 contributes to the green infrastructure network as it does not apply to hedges or screen planting.

Places and Neighbourhoods policies PN1 – PN11

- 5C11.26 The desire to 'green-up' places and neighbourhoods set out in section 11 of the Draft Revised Lambeth Local Plan October 2018 varies. Policies for Waterloo, Vauxhall, Kennington and Loughborough Junction make some reference to green spaces/greenways/green routes/green infrastructure, and seek to achieve SA objective 11. **It is considered that policy PN2(g) on Vauxhall could be further strengthened by adding 'green' to the last part of the clause as follows: ...and create enlarged and new green open spaces where possible** [SA RECOMMENDATION 76]. This helps better achieve SA objective 11, but also the clause seems to focus on green spaces (rather than on hard-landscaped open spaces), and this amendment clarifies that new green spaces are encouraged. **It is also considered that policy PN3(e) could make explicit reference to green infrastructure** [SA RECOMMENDATION 77]. While it is recognised that other local plan policies will also apply to development within the places and neighbourhoods designations – particularly policy EN1 with reference to green infrastructure, it does seem inconsistent that some PN policies explicitly provide for green infrastructure and others do not mention it at all. Virtually all PN policies seek public realm improvements and/or improvements to air quality, and perhaps indirectly this will result in increased green infrastructure provision, as green infrastructure is an easy way to improve the public realm and improve air quality. **Overall it is recommended that the policy team revisit the policies for Streatham, Clapham, Stockwell, West Norwood, Herne Hill and Upper Norwood and reconsider whether it would be appropriate to reference 'greening' these places in the policies** [SA RECOMMENDATION 78].

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C11.27 Overall, and taking into account the criteria outlined in the Sustainability Framework it is likely that the Draft Revised Lambeth Local Plan October 2018 policies will have a significant positive effect on creating, managing and enhancing green infrastructure against existing baseline environment.

Table 24: Summary assessment of effects of Local Plan on green infrastructure

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
To create, manage and enhance green infrastructure.	+/?	++/?	<p>Taking into account existing baseline conditions (and recognising data is limited) of green infrastructure, it is considered that the Draft Revised Lambeth Local Plan October 2018 generally provides well for SA objective 11 and significant positive effects are anticipated, provided policies are fully considered at pre-app stage and fully implemented at decision-making of applications. Application of the urban greening factor is anticipated to result in significant positive effects for green infrastructure. Policy EN1 ensures green infrastructure and open spaces are protected and maintained, seeks to increase provision of green infrastructure, and improve quality and access to green infrastructure. There is also a much more prevalent political and social push towards improving air quality, and provision of green infrastructure is one good way of achieving this. Accordingly there is potential for positive cumulative effects on green infrastructure in the predominately urban existing environment, as policies EN1, Q6, Q7, Q9, Q10, Q14, places and neighbourhoods policies (for example Vauxhall) promote creation of green ways and better connections between spaces. It is considered that the Draft Revised Lambeth Local Plan October 2018 provides the appropriate policy context for creating, managing and enhancing green infrastructure.</p> <p>The uncertainty lies in the delivery of the green infrastructure-related policies and the extent and degree of rigour on which they are applied, taking into account all facets of planning policy that are weighed and considered in making decisions on planning applications, and how green infrastructure is maintained.</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>Green infrastructure enhancement can 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>	Permanent

Recommendations for monitoring likely significant and uncertain effects

5C11.28 It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Amount of open space lost through completed planning permissions
- Change in areas of biodiversity importance
- Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)

5C12. CLIMATE CHANGE AND ENERGY

5C12.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

Objective 12: 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.

5C12.2 To achieve this objective, plan policies should seek to minimise emissions of greenhouse gases; increase the proportion of energy both produced and used from renewable and sustainable resources; reduce demand and need for energy; reduce the impacts of climate change (e.g. urban heat island effects, flooding, drought); ensure adaptation to the future impacts of climate change; help new and retrofitted development and infrastructure be located, designed and constructed to withstand the effects of climate change over its design life; promote high quality, appropriate design and sustainable construction methods; promote high standards of energy and environmental performance for new and existing buildings and; minimise embedded carbon in new buildings and development.

Relevant policy objectives

National Level

5C12.3 Section 14 of the *National Planning Policy Framework 2018* is on meeting the challenges of climate change, flooding and coastal change. It states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5C12.4 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

5C12.5 The *draft London Plan (2018)* contains policy on minimising greenhouse gas emissions (SI2), energy infrastructure (SI3), managing heat risk (SI4) and the waste policy encourages renewable energy generation, especially renewable gas technologies from organic/biomass. In preparing the draft Plan the Mayor has had regard to (among other things), climate change and the consequences of climate change, and other policies indirectly positively impact on climate change/climate change adaptation for example improved air quality, flood risk, green infrastructure, water infrastructure

Baseline conditions and existing issues

5C12.6 Total energy consumption in Lambeth equates to 3.2 per cent of the total energy consumption in London and Lambeth ranks 14th out of the 33 London boroughs and has been falling steadily over ten years. The domestic sector accounts for over half of consumption in the borough and gas is the primary fuel type, though this is reducing. It has been estimated that 12,215 households in Lambeth are in fuel poverty, representing over 9% of the households in the borough (DECC 2015),

whereby the household is one which cannot afford to keep adequately warm by spending a reasonable proportion of its income.

- 5C12.7 In 2015, Lambeth had lower levels of carbon dioxide emissions at 3.2 tonnes per capita than London as a whole (3.8 tonnes) and England (5.6 tonnes) and the carbon dioxide emissions continue to fall (BEIS, 2017).

Likely evolution without the draft revised Plan

- 5C12.8 While London Plan policies will apply, 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 for the local context. Climate change could have severe ramifications for London and Lambeth's populations, economy, wildlife, cultural heritage and materials assets.

- 5C12.9 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/sustainability of both existing and new buildings.

Assessment of draft revised Policies

- 5C12.10 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 12, climate change. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft revised Plan on the objective. This review takes account of mitigation already included within the draft revised Plan. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

- 5C12.11 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring	EN3 – Low carbon and energy
D2 – Presumption in favour of sustainable development	EN4 – Sustainable design and construction
D3 – Infrastructure	EN5 – Flood risk
D4 – Planning obligations	EN6 – Drainage/water management
D5 - Enforcement	Q9 – Landscaping
H1 – Maximising housing delivery	Q10 - Trees
H5 – Housing standards	Q14 – Development in gardens
H11 – Estate regeneration	Q20 – Statutory listed buildings
ED3 – Key Industrial and Business Areas (KIBAs)	Q27 - Basements
T1 – Sustainable travel	PN1 – Waterloo
T2 – Walking	PN2 – Vauxhall
T3 – Cycling	PN3 – Brixton
T4 – Public transport infrastructure	PN4 – Streatham
T5 – River transport	PN5 – Clapham
T7 - Parking	PN6 – Stockwell
T8 - Servicing	PN7 – West Norwood
EN1 – Open space	PN8 – Kennington / Oval
EN2 – Local food growing and production	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and monitoring policies

- 5C12.12 Section 106 planning obligations funds may be used for low carbon and renewable energy (among a long list of other things) to mitigate impacts of development and

therefore offers potential for significant positive effects for addressing climate change.

Housing policies H1, H5

5C12.13 The draft London Plan requires the delivery of at least 1,589 per annum net additional dwellings in Lambeth over the ten-year plan period. This level of growth, unmitigated, is likely to result in increased greenhouse gas emissions, and a significant negative effect on this objective. Predicted population increase and new housing numbers over the plan period may result in an aggregated increase in CO₂ emissions. It is also noted that in combination, application of policies in the Draft Revised Lambeth Local Plan October 2018 and draft London Plan are likely to progressively reduce the CO₂ emissions from residential dwellings during the course of the Plan. Within Lambeth, it is considered that that increased emissions from new housing can be mitigated through high standards of energy efficient design and construction (including encouragement to adopt Homes Quality Mark / Passivhaus homes); dual aspect dwellings, district heat networks, provision of green infrastructure and patterns of development that reduce the need of private vehicle transport. Residential densities will be optimised taking into account accessibility for walking and cycling, and existing and planned public transport (including PTAL). There are uncertainties around whether their effects can be mitigated completely. These lie with the delivery of district heat networks, and the level of obligation on developers (and indeed feasibility and viability) to exceed carbon reduction targets, without adversely affecting developer interest in the borough. Uncertainty also arises from the actual uptake of Homes Quality Mark / Passivhaus approved homes delivered.

5C12.14 **Given the often large area and extent of housing affected in estate regeneration schemes, and the level of affordable housing required, the policy team may wish to consider how estate regeneration schemes should approach heating, energy consumption, low carbon and/or renewable use in policy H11 on estate regeneration [SA RECOMMENDATION 79].** Policy EN3 and EN4 will apply, but there may also be opportunity to set out expectations in policy H11 as well. SA recommendation 31 is further endorsed that **clause (e) should also refer to policy EN4, and possibly EN3 too. It is recommended the policy team revisit this [SA RECOMMENDATION 80].**

Economic development policy ED3

5C12.15 Policy ED3 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 29 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 (including research and development) in the boroughs KIBAs will help combat climate change and emissions from all activities (residential, transport, commercial). This may contribute positively towards the objective.

5C12.16 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, these policies in themselves are likely to have a neutral effects. This is because areas earmarked for increased economic activity, such as Vauxhall and 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,

(assessed under London Plan policy E7). Again, this reduces the likelihood of private car use. In addition, possible negative effects of growth are mitigated by other policies within the Plan, for example high standards of energy efficiency and design, district heat networks, increased greenery and green infrastructure.

Transport policies T1 – T7

5C12.17 The transport policies seek to promote sustainable travel, particularly active travel through improving environments for walking and cycling. Policy T1 states the council promotes a sustainable pattern of development, maximising trips made by sustainable modes 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). The policies contain a clear ambition on improving the environment for walking and cycling trips. There is provision for electric charge points for both cycles and cars. Provisions of car parking is minimised – indeed with PTAL zones 1 and 2, the policy T6 allows for less parking spaces per dwelling than London Plan standards. All of the CAZ, Waterloo and Vauxhall opportunity areas, and PTAL zones 4-6 in Lambeth are car-free under London Plan standards.

5C12.18 Overall, it is considered that the transport policies are likely to result in significant positive effects on the achievement of SA Objective 11 in terms of reducing and managing emissions arising from transportation, particularly given the level of growth required in the borough through London Plan obligations associated with housing and Opportunity Areas.

Environment policies EN1 – EN5

5C12.19 The Draft Revised Lambeth Local Plan October 2018 contains good policy on protecting open spaces and green infrastructure, increasing the quantity of open space and green infrastructure and improving the quality of such spaces as well. Application of the new urban greening factor in major developments is considered likely to significantly increase green cover in the borough, provided it is implemented with rigour at planning decision making, when considered and weighed against all other variables part of the planning process. The policy supports living roofs and walls. 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. 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 and green infrastructure in terms of reducing heat island effect and reducing impacts of climate change is commendable.

5C12.20 Policy EN2 on food growing areas also contributes positive effects to SA Objective 12.

5C12.21 A significant policy in the attainment of SA Objective 12 is Policy EN3 on decentralised energy. The policy seeks to meet London Plan requirements (policy SI3) and Lambeth will be applying draft London Plan policies on minimising greenhouse gas emissions (SI2), energy infrastructure (SI3), managing heat risk (SI4). Application of draft London Plan policy SI2 – minimising greenhouse gas

emissions should result in positive effects on the attainment of SA objective 12. Green technology and sustainable design and construction is a rapidly evolving field and during the plan period, it is hopeful the costs associated with green technologies will reduce, particularly as more zero-carbon developments are delivered in line with Government policy. However, there is some uncertainty in the delivery of district heat networks, particularly in identifying Energy Centres, and possible uncertainty on trade and negotiations with the UK's departure from the EU and how this may impact on low carbon/ decentralised energy industries/infrastructure delivery.

5C12.22 Policy EN4 provides for sustainable design and construction. New build residential developments are encouraged to use the Home Quality Mark and Passivhaus design standards. Non-residential developments including major refurbishments are expected to meet at least BREEAM 'excellent' rating. This is critical for minimising energy consumption and reducing greenhouse gases given the level of growth proposed for the borough.

5C12.23 Overall, and taking into account the level of growth proposed for the borough (in line with draft London Plan targets), 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. Importantly, the policy requires development to be resilient to climate change by including climate change adaptation measures. 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 updated London Plan Supplementary Planning Guidance for Sustainable Design and Construction, which should help maximise positive effects.

5C12.24 It is considered that policy EN5 on flood risk has a significant positive effect on SA objective 12 (particularly in terms of climate change adaptation). It appropriately addresses and minimises effects on developments of flood risk, including impacts arising from future climate change. Similarly it is considered that policy EN6 on drainage and water management appropriately reduces the impacts of climate change and ensures adaptation to the future impacts of climate change

Quality of built environment policies Q9, Q10, Q14, Q20, Q27

5C12.25 In terms of policies Q9 landscaping and Q10 trees and Q14 (development in gardens), new tree planting and other greenery helps reduce the heat island effect, provides shading, cools ambient air temperatures and improves air quality through filtering particulates which all help achieve SA Objective 12.

5C12.26 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 Q20 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, older buildings are not necessarily less energy efficient. 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.

- 5C12.27 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 building, 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.
- 5C12.28 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. **Historic England has prepared recent guidance on energy efficiency and historic buildings and it is recommended that such guidance is referred to by the design team and referred to in the council's Historic Environment Strategy (policy Q18) [SA RECOMMENDATION 81].**

Places and neighbourhoods policies

- 5C12.29 Such development as that proposed under some PN policies, particularly PN1 – PN4 and PN 7 will inevitably result in increased energy consumption and greenhouse gas emissions and therefore a significant negative effect on this objective. There are a number of ways in which the Draft Revised Lambeth Local Plan October 2018 seeks to mitigate this effect. 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. Increased provision of green infrastructure is required from developments and all developments need be to a high standard of sustainable design and construction, and be resilient to climate change. The policy for Stockwell specifically makes provision for reducing carbon emissions and adapting to climate change. Vauxhall policy makes reference to climate change too, and district heat network, as does Brixton. Other than that, PN policies are generally silent on carbon reduction and impacts of climate change, However, it is recognised that other Local Plan and London Plan policies will apply to these places and neighbourhoods, and repetition in every place specific policy may not be considered necessary.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C12.30 Overall, and taking into account the criteria outlined in the Sustainability Framework, and the housing growth requirements on the borough as set out in the draft London Plan, it is possible that the Draft Revised Lambeth Local Plan October 2018 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.

Implementation of these policies will ensure that new developments are also likely to be better adapted to the predicted changes in climate through sustainable design, as well as higher levels of resource efficiency.

Table 25: Summary assessment of effects of Draft Revised Lambeth Local Plan October 2018 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>It is accepted that there is likely to be increases in greenhouse gas emissions associated with the levels of growth projected for the borough. However, it is considered a robust policy approach to mitigate effects is provided through draft London Plan policies (for example SI2, SI3, SI4) and Draft Revised Lambeth Local Plan October 2018 policies (for example EN4 together with transport policies and spatial development policies).</p> <p>Taking into account growth required by the draft London Plan, review of Lambeth Local Plan policies concludes that there is a possible positive impact on this objective through policies which act to minimise energy consumption and reduce carbon emissions through development. Examples of these are district heat networks, more energy efficient design and construction, living roofs and walls, application of the urban greening factor, encouraging mixed use developments near public transport hubs, and improvements for facilitating active travel.</p> <p>Uncertainties lie with the delivery of district heat networks, and the level of obligation on developers (and indeed feasibility and viability) to exceed carbon reduction targets, without adversely affecting developer interest in the borough. Development of new green technologies and associated reductions in costs of these technologies will help achieve the objective.</p> <p>It is positive that the Draft Revised Lambeth Local Plan October 2018 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 and the urban greening factor are considered a critical component of adaptation measures.</p> <p>A significant portion of the Boroughs emissions come from housing (approx 41%), and the delivery of new housing is a Draft Revised Lambeth Local Plan October 2018 and London Plan priority.</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 a public transport improvements, delivery of sustainable building and design standards (i.e. Home Quality Mark and/or Passivhaus and BREEAM standards); delivery of district heating networks and other developments being linked into them and the technical feasibility and viability of installing small scale renewable energy or low carbon technologies. In the short –term, there continues to be uncertainty in technology development/supply and construction due to the uncertain terms under which the UK will leave the EU and the current difficult economic climate the UK is in.	<p>Temporary increases in emissions may result as a consequence of demolition and new 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 Revised Lambeth Local Plan October 2018 policies that either directly or indirectly seek to reduce greenhouse gas emissions.</p>

			<p>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, 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 through planning policy.</p>		
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Recommendations for monitoring likely uncertain effects

5C12.31 It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth Local Plan October 2018 identified in the SA:

- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Amount of open space lost through completed planning permissions
- Change in areas of biodiversity importance
- Number of major application approvals for non-residential developments achieving BREEAM Excellent
- Carbon dioxide emission reductions against Part L building regulation requirements in approved major developments
- Number of buildings built to Home Quality Mark or Passivhaus standard and BREEAM excellent
- Number of DHNs in the borough and dwellings/premises linked to them.

5C13. WATER RESOURCES AND FLOOD RISK MANAGEMENT

5C13.1 This section of the SA relates to the sustainability performance of the draft Local Plan against:

Objective 13: 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.

5C13.2 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.

Relevant policy objectives

National Level

5C13.3 Paragraphs 155 - 165 *National Planning Policy Framework 2018* relate to flood risk and sustainable urban drainage systems. Local Plans should apply a sequential, risk-based approach to the location of – taking into account the current and future impacts of climate change – so as to avoid where possible flood risk to people and property.

Regional Level

5C13.4 Draft *London Regional Flood Risk Appraisal – December 2017* represents important evidence to underpin the new draft London Plan. The level of detail of data used and the resulting mapping has greatly improved compared to the previous RFRA, providing better information and evidence for Local Plans, Opportunity Area Planning Frameworks, and infrastructure providers.

5C13.5 Draft *London Plan (2018)* policy SI12 sets out the strategic approach to flood risk in London. Development plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Policy SI13 is on sustainable drainage, whereby the well-established drainage hierarchy is at the centre of the policy. It will help to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible. The role of blue roofs is specifically highlighted in the new policy. They can be green roofs engineered to retain water or attenuation tanks at roof or podium level. The combination of a blue and green roof is particularly beneficial as the attenuated water is used to irrigate the green roof.

5C13.6 *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.

Local Level

5C13.7 The Strategic Flood Risk Assessment 2013 also identifies spatial variation in flood risk from fluvial and surface water flooding. It contains guidance for developments in flood risk areas as well as hazard and depth maps. Maps divide the borough into zones on the basis of the probability of flooding occurring, ignoring the presence of any flood defences / alleviation

measures. Areas identified in the SFRA as at highest risk of fluvial and tidal flooding in Lambeth are Waterloo, Vauxhall and adjacent to the River Graveney. An addendum to the SFRA 2013 has been prepared that takes account of the updated breach data modelling provided by the Environment Agency.

Baseline conditions and existing issues

Fluvial flooding

- 5C13.8 The key main rivers within Lambeth Borough are:
- River Thames;
 - River Graveney; and
 - River Effra
- 5C13.9 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.
- 5C13.10 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.
- 5C13.11 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.
- 5C13.12 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.
- 5C13.13 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 is about 166.5 litres per person per day (Environment Agency 2012).

Likely evolution without the draft revised Plan

- 5C13.14 In the absence of the Draft Revised Lambeth Local Plan October 2018 the current local plan 2015 would be considered out-of-date by 2020 and the council will need to rely on the London Plan and NPPF policy. Annex 5 of the Draft Revised Lambeth Local Plan October 2018 contains useful detail on the restrictions on development in the various flood zones. 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. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of draft revised Policies

5C13.15 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 13, water resources and flood risk. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

5C13.16 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring	Q6 – Urban design public realm
D2 – Presumption in favour of sustainable development	Q9 – Landscaping
D3 – Infrastructure	Q14 – Development in gardens
D4 – Planning obligations	Q27 – Basements
H1 – Maximising housing growth	PN1 – Waterloo
H5 – Housing standards	PN2 – Vauxhall
H10 – Gypsy and travellers	PN3 – Brixton
H11 – Estate regeneration	PN4 – Streatham
T5 – River transport	PN5 – Clapham
T7 – Parking	PN6 – Stockwell
EN1 – Open space	PN7 – West Norwood
EN4 – Sustainable design and construction	PN8 – Kennington / Oval
EN5 – Flood risk	PN9 – Herne Hill
EN6 – Sustainable drainage systems and water management	PN10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and Monitoring policies D1 – D4

5C13.17 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 infrastructure such as Thames Tunnel, and improvement works for the River Graveney including flood storage and riparian bank improvements. In terms of improving water quality, significant positive effects are considered likely to result and improvements to flood defences is likely to reduce flood risk of surrounding areas. **The policy team may wish to consider listing ‘flood defences’ to policy D4 clause (b) [SA RECOMMENDATION 82].**

Housing policy H1, H5, H11

5C13.18 A significant number of new dwellings (at least 1589 pa in line with draft London Plan 2018 requirements) are proposed for delivery in the borough. Inevitably, this policy will have a significant negative effect on this objective as it will result in increased water use and may increase flood risk if not managed or considered appropriately. Whilst an increase in population and number of houses may have an aggregate increase on the demand for water, it is considered such effects are mitigated by policies elsewhere in the plan. It is also important to point out that the SHLAA (Strategic Housing Land Availability Assessment) considered flood risk when calculating the potential housing capacity in London.

5C13.19 A number of Local Plan policies seek to mitigate impacts on the objective. 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 high standard of sustainable design and construction, and consider climate change, which should also incorporate water management features in housing design. Policy H5 states that

external communal amenity areas should incorporate effective water management. SA recommendation 31 that reference should also be made to policy EN4 in clause (e) of policy H11 estate regeneration, is further supported with respect to SA objective 13.

Transport policies T5, T6

- 5C13.20 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.

Environment policies EN1, EN4 – EN6

- 5C13.21 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 indirectly supports sustainable urban drainage systems, improves the quality of surface waters and groundwater and minimises flood risk and will therefore result in significant positive effects on the attainment of SA Objective 12. Increased provision of green infrastructure also contributes to reducing run-off. The policy supports living walls and roofs. Indeed green roofs can also contribute to sustainable drainage and can effectively reduce the risk of localised flood by reducing surface run-off.
- 5C13.22 Policy EN4 seeks sustainable design and construction of all developments, including residential (Home Quality Mark and Passivhaus encouraged), non-residential (BREEAM) and construction of the public realm (CEEQUAL). The BREEAM tool contain standards for water consumption and surface water run-off. The approach for water infrastructure is set out in the draft London Plan policy SI5 C and E.
- 5C13.23 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 draft 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 with sequential tests met. Annex 5 of the Draft Revised Lambeth Local Plan October 2018 set out restrictions on developments in the different flood zones.
- 5C13.24 It is considered that policy EN6 on sustainable drainage systems and water management, together with policy EN5, will mitigate the negative effects of the level of growth provided for the borough – they 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 and flood risk design of developments. The policy recognises it is essential for adequate local public sewerage network infrastructure to be in place ahead of development to avoid unacceptable impacts on the environment such as sewage flood of residential and commercial development and pollution of land and watercourses. The policy seeks to minimise water consumption and the pressure on the combined sewer network through incorporating water efficiency measures into developments.

5C13.25 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, enforcement and how buildings are used by occupiers. 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 with a decrease in costs, and a step-change in behaviour and use of occupiers of buildings.

Quality of built environment policies Q6, Q9, Q14, Q27

5C13.26 Policy Q6 on urban design public realm supports development that provides (among other things) permeable paving. Supporting text paragraph 10.21 states that 'it is important that public realm works are consistent with the council's agreed standard streetscape materials and street furniture'. To achieve positive effects with regards to SA objective 13, the policy team must be satisfied that the council's agreed standard streetscape materials include permeable paving. **It is recommended that further information is provided on the 'agreed standard streetscape materials' – perhaps by an online link to improve transparency and for clarification [SA RECOMMENDATION 83].**

5C13.27 Landscaping can refer to both soft and hard landscaping. Policy Q9 landscaping enables positive effects for managing surface water runoff and minimising flood risk. Landscaping of developments needs to maximise opportunities for greening (thereby contributing to reducing runoff rate) and should provide sustainable drainage and minimise surface runoff. Policy Q14 on development in gardens should reduce surface water runoff of sites through limiting development in these areas and resisting proposals that would result in poor drainage. In front gardens, soft landscaping is preferred and any car parking surface needs to be permeable.

5C13.28 Supporting text paragraph 10.119 identifies Vauxhall, Albert Embankment and Waterloo as potential locations for tall buildings. These areas are also known flood risk areas. Provided such buildings are designed to be flood resistant and resilient (in line with policy EN5), it is considered that tall buildings in these locations are more likely to reduce flood risk to people and property above the flood level than more traditional lower built dwellings/buildings.

5C13.29 Basement development will only be supported provided no unacceptable impacts will result to surface flow and flooding, and subterranean ground water flow (among other things). Basement accommodation will generally be expected to incorporate sustainable drainage measures or any other mitigation measures where required. Supporting paragraphs 10.134 and 10.135 further explain how basements can be vulnerable to flooding. Overall it is considered that the basements policy adequately considers water management and flood risk.

Places and neighbourhoods policies PN1 – PN11

5C13.30 The level of growth proposed in these policies is inevitably going to place increased stresses on the water resource and such growth is likely to have a significant negative effect on this objective. The whole of Waterloo and Vauxhall opportunity areas are within flood risk zones. While this is recognised in supporting text, policies PN1 and PN2 are silent on flood risk. Mitigation of the effects of the development proposed in the places and neighbourhoods policies will be provided through other relevant policies on water and flood risk, particularly EN4, EN5 and EN6. Uncertainties arise around the fact that the success of these policies is dependent upon implementation, water consumption behaviour, attitude and use of occupiers, ambitiousness sought by developer / encouraged by the council, and enforcement.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C13.31 Overall, and taking into account the criteria outlined in the Sustainability Framework, projected population growth, and the housing targets assigned in the draft London Plan to be delivered in Lambeth; it is considered that Draft Revised Lambeth Local Plan October 2018 policies seek to achieve SA Objective 13.

Table 26: Summary assessment of effects of Draft Revised Lambeth Local Plan October 2018 on water and flood risk

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
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 accepted that there is likely to be increases in water use and increased flood risk associated with the levels of growth projected for the borough.</p> <p>However whilst increases in population, and the number of houses, may have an aggregate increase on the demand for water, such effects are mitigated by policies elsewhere in the Draft Revised Lambeth Local Plan October 2018 and/or draft London Plan. Similarly, effects on flood risk from increased growth are mitigated to some extent through flood risk policies and other policies that indirectly reduce flood risk (e.g. open spaces, green infrastructure, sustainable urban drainage systems).</p> <p>Still, it is unclear from the appraisal of Lambeth's policies whether they will be able to completely mitigate the effects of the new development. 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, increased permeable surfaces, provision for water recycling in developments and flood resilient design.</p> <p>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, enforcement and behaviour, attitude and use of water by occupiers of buildings. Therefore effects are likely to be uncertain particularly in short term while development occurs, measures like SUDs are delivered and until 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 draft London Plan housing targets and developing the Opportunity Areas. The policy also recognises the sequential and exception tests of the NPPF.</p> <p>However, given that delivery of the Draft Revised Lambeth Local Plan October 2018 proposes significant development in Opportunity Areas along the Thames; in order to reduce and manage flood</p>	<p>All development in identified flood zones two and three will 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 be completed in the mid-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>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. Tall buildings for example can reduce flood risk for dwellings / commercial space above the flood level.</p> <p>Therefore, it is considered that the cumulative effects of attaining SA Objective 13 are largely dependent upon implementation. It is for this reason that effects are to some extent uncertain. Developments in Opportunity Areas need be 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 demonstrated as making developments unfeasible or unviable.</p>		
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Recommendations for monitoring of uncertain effects

- 5C13.32 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
 - Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues.

5C14. WASTE

5C14.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

Objective 14: Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.

5C14.2 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.

Relevant policy objectives

National Level

5C14.3 *National Planning Policy for Waste* and the *National Planning Practice Guidance* require waste planning authorities to plan for seven waste streams. This is a change since Lambeth's Local Plan was adopted in 2015. These waste streams are:

- Municipal/household (apportioned by the London Plan)
- Commercial/industrial (apportioned by the London Plan)
- Construction, Demolition & Excavation
- Low Level Radioactive
- Agricultural
- Hazardous
- Waste water

Regional Level

5C14.4 At a regional level, the Mayor wants London to manage the equivalent of 100% of its waste within its borders by 2026 (net self-sufficiency). This will be achieved through targets for each borough, including meeting an apportionment of municipal/household and commercial/industrial waste. Policies SI7, SI8 and SI9 of the draft London Plan 2018 are on waste management and address reducing waste and supporting the circular economy; waste capacity and net waste self-sufficiency; and safeguarding waste sites.

Baseline conditions and existing issues

5C14.5 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.

5C14.6 The main types of waste arising in Lambeth are household, business and construction waste. Lambeth produces around 121,000 tonnes of local authority collected waste a year and around 100,000 tonnes of business waste. The majority of Lambeth's waste is exported to facilities within London in the first instance (see table below) (Lambeth Waste Evidence Base 2018).

Table 27: Exports by destination (all waste streams)

Destination	2013	2014	2015	2016
London	63,273 (89%)	83,744 (82%)	118,848 (86%)	189,915 (93%)
South East	5,250 (7%)	6,345 (6%)	15,316 (11%)	10,385 (5%)
East of England	2,507 (3.5%)	12,175 (12%)	4,660 (3%)	3,353 (1.5%)
Other	123 (0.5%)	36 (0%)	104 (0%)	435 (0.5%)
Total exports	71,153	102,301	138,928	204,088

Source: WDI

- 5C14.7 The tables below shows that waste exports have been increasing over recent years. However, the proportion being exported outside of London is decreasing (Lambeth Waste Evidence Base 2018).

Table 28: Exports by destination facility type 2013-2016 (all waste streams)

Destination facility type	2013	2014	2015	2016
Treatment	36,620	45,465	88,401	101,195
Transfer	24,603	35,458	25,281	88,016
Landfill	8,377	14,777	24,369	16,890
Other	1,553	6,601	877	296
Total exports³	71,153	102,301	138,928	204,088

Source: WDI

Table 29: Exports by waste type 2013-2016 (all waste streams)

Waste type	2013	2014	2015	2016	
HIC		21,142	28,086	25,756	20,138
Inert		49,842	73,426	111,279	182,133
Hazardous (WDI)		169	789	1,893	1,816
Total exports		71,153	102,301	138,928	204,088
Hazardous (HWDI)		4,971	4,134	2,511	9,713

Source: WDI and HWDI

Likely evolution without the Draft Revised Lambeth Local Plan

- 5C14.8 The council will continue with its waste management procedures in the absence of the Draft Revised Lambeth Local Plan October 2018. However, critically, in the absence of the Draft Revised Lambeth Local Plan October 2018, the council will not be meeting national requirements for waste planning authorities to plan for seven waste streams. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of draft revised Policies

- 5C14.9 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 14, waste. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft revised Plan on the objective. This review takes account of mitigation already included within the draft Plan.
- 5C14.10 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	H1 – Maximising housing growth
D2 – Presumption in favour of sustainable development	H11 – Estate regeneration
D3 – Infrastructure	ED3 - KIBAs
D4 – Planning obligations	ED1 – Offices (B1a)
	ED13 – Visitor attractions, leisure, arts and

culture uses	PN3 – Brixton
ED12 – Markets	PN4 – Streatham
T7 - Servicing	PN5 – Clapham
EN4 – Sustainable design and construction	PN6 – Stockwell
EN7 – Sustainable waste management	PN7 – West Norwood
Q12 – Refuse/ recycling storage	PN8 – Kennington / Oval
Q20 – Statutory listed buildings	PN9 - Herne Hill
Q27 – Basements	PN10 – Loughborough Junction
PN1 – Waterloo	PN11 – Upper Norwood
PN2 – Vauxhall	

Delivery and monitoring policies D1 – D4

- 5C14.11 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 significant 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). **The policy team may wish to reconsider whether waste infrastructure should be included in policy D4, particularly innovative waste infrastructure that is multi-functional, for example waste used to provide heat/energy [SA RECOMMENDATION 84].**

Housing H1, H11

- 5C14.12 Policy H1 seeks to maximise the supply of additional homes in Lambeth. Draft London Plan policy requires at least 1,589 net additional dwellings per annum and Lambeth policy seeks to exceed this allocation. This will result in increased domestic (and construction) waste and therefore likely to result in negative effects on the objective. 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 need to 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 is not delivered. In addition, major developments will need to demonstrate how they meet the Mayor's net-zero-waste target through a circular economy statement (see revised draft local plan policy EN7 and draft London Plan waste policies). Accordingly it is considered that policies are in place to mitigate effects of additional waste caused by increase in house building and occupation. Estate regeneration schemes should follow ten key design principles for new homes, one of which is 'discrete and convenient storage for waste and recycling'. This is commended. **The policy team may wish to consider adding a signpost to policy Q12(c) in clause (e) of policy H11 alongside reference to policy EN1 and SA recommended reference to policy EN4 [SA RECOMMENDATION 85].**

Economic development policies ED1, ED3, ED12, ED13

- 5C14.13 The economic development policies of the Draft Revised Lambeth Local Plan October 2018 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 (policy EN4)).
- 5C14.14 Policy ED3 ensures there is land supply for waste management uses within KIBAs. Land within KIBAs is protected 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 14 by ensuring an adequate supply of land to meet the future waste management requirements of

the borough during the plan period. However, permitted development rights from B8 to residential may result in loss of land in KIBA use which may have a detrimental effect /reduce options for sites for future waste management use. All sites in current waste management or transfer use are protected by policy EN7, whether they are within a KIBA or not.

5C14.15 Under draft policy ED1 proposals involving a net loss of office floorspace will not be supported unless tests are met, one of which is there is no demand for the office floorspace, and it would not be feasible and/or viable to refurbish, renew, modernise or redevelop the offices to meet requirements of existing or future occupiers, and it would not be feasible and/or viable to adapt the office floorspace as smaller B1 units. It is considered that indirectly this policy seeks to minimise construction/demolition waste. New development proposals will inevitably generate increased waste, particularly if demolition is involved. Increased tourism, visitors, and markets can increase litter levels and general waste. However, it is considered that the policies on markets (ED12) and visitor attractions (ED13) recognise waste as a by-product/effect of their operation and seek to manage waste generation, and together with other Draft Revised Lambeth Local Plan October 2018 policies seek to manage such impacts (e.g. EN7, T7).

Transport policy T7

5C14.16 The Delivery and Servicing Plan required by policy T7 will include information on waste collection services and therefore results in positive effects on the objective.

Environment policies EN4 and EN7

5C14.17 The BREEAM standard includes 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. Policy EN7 respects the waste hierarchy, in particular the efficient use of resources, the reuse of materials and resources, composting and the recovery of energy from materials. Overall it is considered that policy EN7 should result in significant positive effects on the achievement of SA objective 14. Major development sites will need to demonstrate how they meet the Mayor's net zero-waste target through a Circular Economy Statement. Other developments will be expected to recycle construction, excavation and demolition waste on-site wherever practicable. Construction demolition and excavation waste should be minimised through reuse and recycling within London as far as possible. Disposal of such waste in landfill should only take place in exceptional circumstances. **Supporting text para 9.68 may need further clarification as it states that 'CD&E waste that is not recyclable will be exported to landfill sites outside of London'. This doesn't quite match to what clause (d) says. The supporting text might need reference to the 'exceptional circumstances' referred to in clause (d) [SA RECOMMENDATION 86].**

5C14.18 **The policy team may also wish to consider amending supporting text para 9.63, third sentence as follows: 'Redevelopment of safeguarded waste sites for other uses will only be supported if re-provided on-site or if compensatory waste capacity is provided elsewhere in the borough' [SA RECOMMENDATION 87].** This will allow for situations where the site is proposed to be redeveloped and the safeguarded waste element/capacity is re-provided within the same site/redevelopment.

Quality of built environment policies Q12, Q20, Q22, Q27

5C14.19 Policy Q12 is on refuse and recycling storage. The policy helps meet SA Objective 14 by enabling safe storage of waste and recycling convenient both for users and collectors. **It is considered that supporting text para 10.45 could be amended to encourage more sustainable forms of screening of bins, for example hedges/soft landscaping, rather than just brick [SA RECOMMENDATION 88].**

5C14.20 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 significant positive effects on SA Objective 14 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. Basement development will only be supported where no unacceptable impacts will result to waste to landfill (among other things).

Places and neighbourhoods policies PN1 – PN11

5C14.21 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. However, other Draft Revised Lambeth Local Plan October 2018 policies (e.g. EN7, Q12) will also apply to 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 (aka NEV) Framework proposes an anaerobic digestion plant at New Covent Garden market (in Wandsworth Borough), Brixton SPD.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C14.22 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is possible that the Draft Revised Lambeth Local Plan October 2018 could have a positive effect on the minimising waste, maximising reuse and recycling of waste, and increasing landfill diversion. It is also considered that the draft revised Local Plan policies support and where appropriate improve existing baseline conditions.

Table 30: Summary assessment of effects of 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 re-use, recycling, remanufacturing and recovery rates	+/?	+/?	<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. However, the Plan also promotes significant levels of new development (particularly housing in response to draft London Plan requirements) and this is inevitably going to result in increased levels of waste. It is unclear from the appraisal whether policies will be able to completely mitigate effects of new development. This is addressed through the London Plan waste apportionment. The draft Local Plan identifies and promotes KIBAs as appropriate locations for waste management uses.</p> <p>Policy EN7 on waste management and policy Q12 refuse and recycling storage seek to mitigate effects and should result in positive effects with continued downward trends on waste arisings baseline data (i.e. reduction in waste arisings despite population increases).</p> <p>There is also an element of uncertainty on waste operators coming forward and locating in the borough. It is recognised that the draft Plan promotes KIBAs for this use.</p> <p>Achievement of higher BREEAM standards should result in more positive effects with regards to waste as these assessment tools contain waste and reuse components/credits.</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 of SA objective 13 will unlikely be evident until at least the medium to long-term as the large scale redevelopment of key locations occurs.</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 in increasingly innovative ways as technologies develop, particularly towards the end of the Plan period.</p>

Recommendations for monitoring likely uncertain effects

- 5C14.23 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:
- New waste capacity (tonnes) by management type (recycling/composting, recovery, transfer and disposal) and type of wastes handled (HIC and CD&E)
 - Loss of waste sites to other uses. Location and amount of compensatory capacity
 - Infrastructure Delivery Plan updates

5C15. AIR QUALITY

5C15.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

Objective 15: To improve air quality.

5C15.2 To achieve this objective, plan policies should improve air quality; reduce emissions of 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 Standards Regulations 2010) as well as local air quality management targets; support the planting of trees; and promote the 'transport hierarchy'.

Relevant policy objectives

National Level

5C15.3 Para 181 of the *National Planning Policy Framework 2018* is on air quality. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of air quality management areas and clean air zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at plan-making stage, too ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.

Regional Level

5C15.4 The *London Plan (2018)* contains a number of policies that either directly or indirectly seek to address air quality and natural resources. Policy S11 is on improving air quality. Development proposals should not lead to further deterioration of existing poor air quality. Design solutions should prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are used by large numbers of people particularly vulnerable to poor air quality, such as children or older people. Large-scale development proposals as part of masterplans and development briefs subject to EIA should achieve Air Quality Positive approach, and major development proposals must be at least air quality neutral and be submitted with an air quality assessment.

Local Level

5C15.5 The Borough has an Air Quality Action Plan, which sets out a list of proposed measures and action that the council will take to improve air quality between 2017 and 2022.

Baseline conditions and existing issues

5C15.6 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.

5C15.7 Road traffic continues to be the primary cause of air pollution in London and in Lambeth the majority of air pollution is caused by road vehicles. The Greater London Authority designates Air Quality Focus Areas in London which are areas that have high levels of pollution and human exposure. In Lambeth, there are five Focus Areas

which lie along major transport corridors (A23 from Brixton to Streatham, Kennington Oval/Camberwell New Road (A202)/Kennington Park Road (A3), Vauxhall Cross, Clapham Road (A3), Waterloo Rad). The three major sources of emissions in the borough are from residential and commercial premises (mainly gas boilers) and construction sites (dust and machinery emissions) – with emissions from construction activities noted to be increasing (Lambeth Air Quality Action Plan 2017-2022).

Likely evolution without the draft revised Plan

5C15.8 In the absence of the Draft Revised Lambeth Local Plan October 2018 the council will need to rely on the provisions in the London Plan and Lambeth Air Quality Action 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 Draft Revised Lambeth Local Plan October 2018 growth may occur in a manner that generates more traffic movements. Opportunities to improve local active travel routes may not be realised or maximised. Open spaces and green infrastructure may not be as well protected. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of draft revised Policies

5C15.9 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 15, air quality. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

5C15.10 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	EN4 – Sustainable design and construction
D2 – Presumption in favour of sustainable development	EN6 – Drainage/water management
D3 – Infrastructure	Q6 – Urban design public realm
D4 – Planning obligations	Q9 - Landscaping
D5 - Enforcement	Q10 – Trees
H1 – Maximising housing growth	Q14 – Development in gardens
T1 – Sustainable travel	PN1 – Waterloo
T2 – Walking	PN2 – Vauxhall
T3 – Cycling	PN3 – Brixton
T4 – Public transport infrastructure	PN4 – Streatham
T5 – River transport	PN5 – Clapham
T7 - Parking	PN6 – Stockwell
T8 – Servicing	PN7 – Oval
EN1 – Open space and green infrastructure	PN8 – West Norwood / Tulse Hill
EN2 – Local food growing	PN9 - Herne Hill
EN3 – Decentralised energy	PN10 - Loughborough Junction
	PN11 – Upper Norwood

Delivery and monitoring policies D1 – D5

5C15.11 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, green infrastructure and parking restrictions/car clubs/travel plans.

5C15.12 As highlighted previously there is some concern, particularly regarding cumulative impacts on air quality, with the policy approach of policy D5 Enforcement.

Housing policy H1

5C15.13 High levels of housing growth will inevitably have an impact on air quality, however it is considered that effects can be mitigated through other policies in the Draft Revised Lambeth Local Plan October 2018 (e.g. EN1, EN4) and London Plan (particularly policy SI1).

Transport policies T1 – T8

5C15.14 Taking into account the level of development proposed for the borough in the London Plan; it is considered that the transport policies should significantly mitigate adverse effects on air quality and on SA Objective 15 as the policies seek to reduce dependence on the private vehicle, maximise trips made by sustainable modes, promote walking and cycling, improve public transport capacity and accessibility and reduce the need to travel. Policy T1 promotes the 'transport hierarchy' with walking and cycling given most priority, and freight transport and private cars with least priority. As highlighted under SA objective 2 – health and well-being, SA recommendations 17 on including the word 'healthier' in policy T2(a) and adding 'air quality' to policy T3(b) are further endorsed with respect to SA Objective 15. Analysis set out in SA paragraph 5C2.35-2.38 also applies with regards to air quality SA objective 15. Maximising use of the River Thames is also encouraged in terms of SA Objective 15 and policy T5 is supported. Policy T7 on parking significantly limits car parking provision in the borough, which seeks to support policy T1 on reducing reliance on the private car, and therefore seeks to mitigate adverse effects on air quality. **Clarification is sought on whether clause T8(h) applies to any electric vehicle to use (perhaps outside of business hours), or is it just service vehicles? It is recommended that the electric vehicle rapid charge point be made available to any electric vehicle if possible, without impacting the ability of service vehicles to use the loading bay [SA RECOMMENDATION 89].**

Environment and open space policies

5C15.15 The Draft Revised Lambeth Local Plan October 2018 clearly states that Lambeth will apply London Plan policy SI1 Improving air quality to all development proposals in the borough, along with associated Mayoral guidance on Air Quality Neutral and Air Quality Positive standards and on ways to reduce construction and demolition impacts. It is considered that alongside London Plan policy SI1, the implementation of London Plan and Local Plan policies on sustainable transport, open space and green infrastructure, energy, sustainable design and construction and waste should result in improved air quality particularly when taking into account the level of growth proposed in the borough over the plan period. Provision of green infrastructure has a much stronger emphasis in the Draft Revised Lambeth Local Plan October 2018, and green infrastructure is an effective way of improving local air quality. Accordingly **it is considered that 'air quality' should be mentioned as a benefit in supporting text paragraph 9.6 [SA RECOMMENDATION 90].**

Quality of built environment policies Q6, Q9, Q10, Q14

5C15.16 In addition to environment and open space policies, a number of quality of built environment policies seek to indirectly improve air quality through their provision of new or enhance open space/landscaping/trees, pedestrian and cycle-priority environments (policy Q6), retention and enhancement of existing planting and landscape features, green infrastructure, green and brown roofs (policy Q9), trees policy (Q10), and controlling development on back gardens (Q14). **The policy team may wish to consider linking Air Quality Focus Areas into policy Q10, Trees. An option might be to not support tree removal in Air Quality Focus Areas, or require planting of additional trees in new developments in Air Quality Focus Areas [SA RECOMMENDATION 91].** Supporting text para 10.34 under policy Q9 landscaping is commended ‘...creation of a range of planting types which might mitigate against poor air quality...’ A similar reference to air quality in policy Q10 would be useful, particularly given current political, environmental and social concerns regarding air pollution.

5C15.17 **Clarification is sought on the definition of ‘trees of value’ in relation to policy Q14. With regards to improving air quality, all trees are considered to be ‘of value’ [SA RECOMMENDATION 92]. It is recommended that supporting text para 10.65 refers to air quality: ‘Landscape design in new schemes within gardens should optimise the opportunities to improve air quality and support wildlife habitats, for birds, insects, reptiles and mammals such as hedgehogs.’ [SA RECOMMENDATION 93]**

Places and neighbourhoods policies PN1 – PN11

5C15.18 The whole borough is designated an air quality management area, yet the improvement of air quality is only mentioned in the Waterloo, Vauxhall, Streatham, Stockwell and Kennington policies. Air quality is mentioned in the short summary of characteristics and challenges for Brixton, but not within the actual policy, despite part of Brixton being within an air quality focus area. Air quality is not mentioned at all in either the short summaries or policies for Clapham, West Norwood, Herne Hill, Loughborough Junction or Upper Norwood. Given the current political, environmental and social concerns of existing air quality, and taking into account the whole borough is an air quality management area and air quality does not respect spatial boundaries; **it is recommended that the policy team revisit the places and neighbourhood policies, particularly Brixton, Clapham, West Norwood, Herne Hill, Loughborough Junction and Upper Norwood, to ensure improvement of air quality is more appropriately recognised [SA RECOMMENDATION 94].**

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C15.19 Overall, and taking into account the criteria outlined in the Sustainability Framework, projected population growth, and the housing targets assigned in the London Plan to be delivered in Lambeth and economic growth; it is considered that the Draft Revised Lambeth Local Plan October 2018 policies, together with London Plan policies, do seek to improve air quality.

Table 31: Summary assessment of effects of Draft Revised Lambeth Local Plan October 2018 on air quality

Assessment of effects of the Local Plan on SA objective 15	Score without recommendations	Score with recommendations	Justification of Score	Timescale and probability	Permanent or temporary
To improve air quality	-/?	?/+	<p>Much development and growth is proposed for the borough during the plan period. This inevitably is going to place additional pressures on air quality. It is considered that the policies seek to mitigate these effects for improved air quality, for example, by reducing the need to travel; discouraging private vehicle use; encouraging more walking and cycling and use of improved public transport; application of the urban green factor, provision for living roofs and walls and other green infrastructure; protection of existing trees and open space and; planting of new trees and greenery. However it is unclear whether effects can be mitigated completely or whether air quality will be improved significantly given recent and current attempts and current baseline conditions. London Plan air quality policy sets out a robust approach to reducing air pollution, but delivery and achievement of the air quality positive approach is uncertain, particularly given it's a new policy approach.</p> <p>Much development is proposed in existing town centres and around public transport nodes and this has positive effects for the objective through good accessibility to public transport and reduced need for private vehicle use. There is a significant push to improve green infrastructure in the borough, and coupled with lower car ownership in Lambeth and more electric vehicle use; it is considered that positive effects are possible for air quality.</p> <p>Much needed improvements to some public transport infrastructure remain uncertain due to identified funding gaps (for example a new station at Brixton and/or Loughborough Junction for the London Overground). The northern line extension has not been delivered before occupation of sites in the Nine Elms Vauxhall Opportunity Area (delivery expected 2020). There is also current funding gap for the Healthy Route Network project to improve walking and cycling borough-wide. It is also noted that no funding has yet been committed for the Low Emission Neighbourhoods project to improve Air Quality and monitoring in Air Quality Focus Areas and around sensitive receptors. 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>However, on the whole, to the extent that local planning policy can influence, it is considered that Draft Revised Lambeth Local Plan October 2018 policies do seek to improve air quality as much as practicable. Implementation of other measures outside of local plan process, such as implementation of ultra-low emission zones and vehicle type and fuel choice will also contribute to reducing air pollution.</p>	<p>Public transport infrastructure projects (e.g. the new station at Brixton) is unlikely to be delivered (if at all) until in the mid to long-term at the earliest and for some projects is dependent on securing funding.</p> <p>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 are likely to be evident in the short term (delivered by 2022).</p>	<p>Permanent.</p> <p>Temporary adverse air quality effects associated with heavy vehicle movements and dust may be likely in the short and medium terms as developments are constructed. However such effects will be addressed in the Construction Logistics Plan required by policy T7 Servicing.</p>

Recommendations for monitoring likely uncertain effects

5C15.20 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
- Infrastructure Delivery Plan updates
- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Amount of open space lost through completed planning permissions
- Change in areas of biodiversity importance
- Carbon dioxide emission reductions against Part L building regulation requirements in approved major developments

5C16. EDUCATION AND SKILLS

5C16.1 This section of the SA relates to the sustainability performance of the Draft Revised Lambeth Local Plan October 2018 against:

- Objective 16: To maximise the education and skills levels of the population.

5C16.2 To achieve objective 16 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; promote healthy, sustainable living; and provide people with the skills to find work.

Relevant Policy Objectives

National Level

5C16.3 Para 94 of the *National Planning Policy Framework 2018* states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

Regional Level

5C16.4 Policy E11 Skills and opportunities for all in the draft *London Plan (2018)* sets out the Mayors aim to co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners. Policy S3 on education and childcare facilities also seeks to provide for higher education, and further education. There are also a number of other draft London Plan policies that indirectly seeks to maximise education and skills level of the population – for example affordable workspace, waste, construction related jobs in relation to delivering home Londoners need, sector growth opportunities and clusters).

Local Level

5C16.5 Lambeth's "Investment and Opportunity Strategy" summarises the key priorities emerging from a local economic assessment (2015). It identifies improving skills as key to tackling increasing inequalities in the local population and ensuring the continued delivery of economic growth. Under Priority Two: Develop skills provision to meet employer needs, one of the key outcomes is to: "raise the quality, quantity and profile of vocational provision in Lambeth", and ensuring that skills provision is "employer-led, reflecting local priorities and skills needs". Under Priority 3: Equip young people for the economy of the future, the strategy sets out an aim to: "significantly increase employer engagement, facilitating relationships with schools and training providers".

Baseline conditions and existing issues

5C16.6 Lambeth has five nursery schools, 65 primary schools and 19 secondary schools. There are also five special schools, two pupil referral units and five colleges. There has been a significant expansion programme of schools in Lambeth to meet increased needs for school places. From 2012, an additional 25.7 forms of entry have been provided at the primary level and 13.5 forms of entry have been provided at the secondary level. In addition, 450 extra additional sixth form places have been provided and 165 additional Special Education Needs and Disabilities (SEND) places have been created.

- 5C16.7 Over the past decade residents have become increasingly skilled, indicating a profound population shift with more highly skilled people moving to Lambeth. More than six out of ten working age residents were qualified at NVQ Level 4 or above in 2014, up from just over four in ten in 2004. These highly skilled people are attracted to Lambeth by its excellent transport connections which allow them to access job opportunities in the borough and in the London economy more generally (SOB 2016).
- 5C16.8 17.8% of working age residents lacked NVQ Level 2 qualifications (i.e. basic skills) in 2015. There is also evidence of Lambeth employers facing skills shortages in the local labour pool: 25% of the job vacancies in Lambeth in 2015 were hard-to-fill due to skill-shortages – above both the London (21%) and England (23%) averages (Employment and Skills SPD 2018). Young people leaving education can face specific challenges in accessing employment. The rate of youth unemployment is above the London average in Lambeth, and with a smaller proportion of jobs requiring low levels of qualifications or experience, competition for entry level jobs in London is particularly fierce (Employment and Skills SPD 2018).
- 5C16.9 As well as being an important employment location, Lambeth makes a crucial contribution to London's economy as a place where young, highly skilled people live. Over 45% of Lambeth residents are educated to degree level, which is comparable with many inner London boroughs as well as Oxford and Cambridge. Around 14% of residents have no qualifications, which is about average for London. Socio-economic classification gives an indication of socio-economic position based on occupation. About a quarter (26.9%) of Lambeth working age residents are in lower managerial, administrative and professional occupations. This is the largest category. 2.4% of working age residents are long-term unemployed, which is one of the highest in London (SOB 2016).
- 5C16.10 The jobs being created in London are increasingly requiring higher levels of skills, placing an ever greater emphasis on the need for high levels of qualifications amongst Lambeth residents. High competition for jobs makes it particularly difficult for residents with low or no qualifications to find work. The Lambeth Growth Strategy Evidence base (2015) concludes that: "it is very clear that future employment opportunities will be overwhelmingly in high skilled occupations", and therefore: "supporting residents in deprived areas to attain better qualifications so that they can access these opportunities must be a key priority for the Council" (Employment and Skills SPD 2018).

Likely evolution without the draft revised Plan

- 5C16.11 Education facilities will continue to be provided in the absence of the Draft Revised Lambeth Local Plan October 2018. However, they may not be located in the best areas from a spatial planning perspective, although it is noted that London Plan policy S3B will apply.

Assessment of draft revised Policies

- 5C16.12 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objective 16, education and skills. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft revised Plan on the objective. This review takes account of mitigation already included within the draft Plan.
- 5C16.13 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring	PN1 – Waterloo
D2 – Presumption in favour of sustainable development	PN2 – Vauxhall
D3 – Infrastructure	PN3 – Brixton
D4 – Planning obligations	PN4 – Streatham
H7 – Student housing	PN5 – Clapham
ED15 – Employment and training	PN6 – Stockwell
SI1 – Safeguarding existing social infrastructure	PN7 – West Norwood
SI2 – New or improved social infrastructure	PN8 – Kennington / Oval
SI3 – Schools	PN9 – Herne Hill
EN2 – Local food growing	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and monitoring policies

- 5C16.14 Overall, it is considered that policies D1 - D4 should result in significant positive effects on SA Objective 16, particularly policy D4 which seeks planning obligations to fund local improvements to mitigate impact of development and requirements made necessary by the development and may include access to employment opportunities created by the development by securing employment premises and learning and skills initiative as well as other infrastructure like education, health, libraries, cultural and community provision.

Housing policy H7

- 5C16.15 The loss of existing student accommodation in the borough is resisted through policy H7, unless it is demonstrated that that facility no longer caters for future or current needs and the floorspace is replaced by another form of residential accommodation. 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 family housing, 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 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 Draft Revised Lambeth Local Plan October 2018 policies taken as a whole will positively meet future demand.

Economic Development policy ED15

- 5C16.16 The level of development proposed for the borough provides opportunities for jobs and apprenticeships in construction and ancillary sectors. Applications for major development must include a site-specific Employment and Skills Plan that will set out a minimum 25% of all jobs created by the development to be secured by the council for local residents; and developers to engage with local school and colleges to promote the achievement of skills and qualifications needed for employment in commercial sectors. Financial contributions will also be sought to support those sections of the Lambeth workforce that are furthest from employment, having been out of work for a long period of time and/or having low levels of skills. 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 16.

Social infrastructure policies S1 – S3

5C16.17 Policies S1, S2, and S3 should result in significant positive effects on SA Objective 16 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 being accessible to the community, not result in adverse impacts (hours of operation, noise, traffic etc), and accommodate shared use of premises where possible. Schemes of more than 25 residential units will also need to provide appropriate provision for social infrastructure where this cannot be met through existing facilities.

Open space and environment policy EN2

5C16.18 Policy EN2 on food growing provides opportunities for informal learning and volunteering for all ages. 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 16. Allowing food growing on non-residential schemes results in more positive effects for the objective (as well as other SA Objectives such as 2 (health), 3 (access to services), 7 (liveability)).

Places and neighbourhoods policies PN1 – PN11

5C16.19 Many of the places provided for in these policies, particularly Waterloo, Vauxhall, Brixton, Streatham and West Norwood promote significant levels of development, including creative enterprise zones, and accordingly provide opportunities for new job creation, both during and after construction. 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.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C16.20 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is possible that the Draft Revised Lambeth Local Plan could have positive effects (albeit with an element of uncertainty) on the improving the existing baseline (to the extent possible by Planning) of education and skills levels of the population.

Table 32: Summary assessment of effects of Local Plan on education and skills

Assessment of the effects of the Local Plan on SA objective 16	Score without recommendations	Score with recommendations	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 16. Employment and training policy ED15 should help maximise the number of local people working on development / construction sites during the plan period.</p> <p>Positively, existing schools and community facilities will be safeguarded. Also some town centres, and economic development policies make provision for the establishment of creative enterprise zones, and 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.</p>	<p>Existing schools and community uses are already safeguarded.</p> <p>As the population grows in response to completed developments there may be increased strain on school places, particularly secondary places. In the longer term, as funding is identified it is hoped that additional school places will be delivered to support 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>

5C17&19. LOCAL ECONOMY AND TACKLING WORKLESSNESS

- 5C17.1 This section of the SA relates to the sustainability performance of the Local Plan against:
- Objective 17: Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimise unsustainable resource use; and
 - Objective 19: Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.
- 5C17.2 To achieve objective 17 plan policies should improve the resilience of business and the economy, e.g. through supporting 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; support development of green industries and a low carbon economy; support and prevent loss of local businesses; encourage business start-ups and support the growth of businesses; help Lambeth play a strong role in London's economy.
- 5C17.3 To achieve objective 19 plan policies should improve accessibility to employment, especially for local people; improve employment opportunities among Black, Asian, Ethnic and Minority groups; protect local employment land and uses; provide additional housing near places of work; help people achieve financial security; and help all young people have opportunities to achieve their ambitions.

Relevant Policy Objectives

National Level

- 5C17.4 Section 6 of the *National Planning Policy Framework 2018* is on building a strong, competitive economy. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Regional Level

- 5C17.5 Chapter 6 of the *Draft London Plan (2018)* contains economic policies for London. Policies support flexibility and adaptability of different sized office space, increased stock of offices, low-cost business space, affordable workspace, land for industry, logistics and services to support London's economic function, designation of locally significant industrial sites, protect and intensify the function of strategic industrial locations, and industrial intensification, co-location and substitution.
- 5C17.6 The *Mayors Economic Development Strategy for London (draft for consultation) December 2017* sets out how the Mayor will achieve:
- **A fairer, more inclusive economy** tackle through world class education, opportunity for all Londoners, lower cost of living, fair pay and employment practices, better health and less poverty, inclusive and safe communities;

- **Creating the conditions for growth** through space for business and work, transport, infrastructure, innovation and skills, and enterprise and entrepreneurship;
- **Supporting London's sectors** through advanced urban services, cultural and creative industries, financial and business services, life sciences, low carbon and environmental goods and services, tech and digital, and tourism; and
- **Delivering the Mayor's vision** through strengthening partnerships, making the case for devolution, and leading by example.

Baseline conditions and existing issues

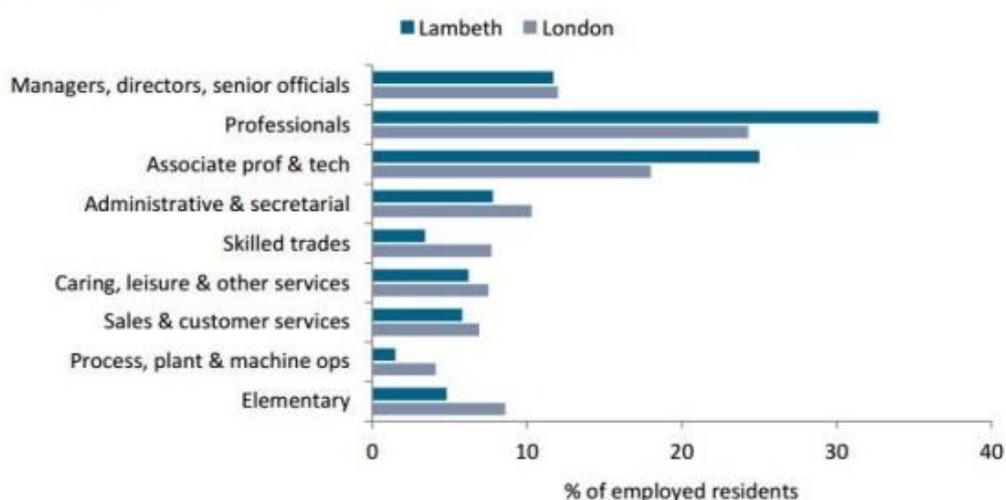
- 5C17.7 The UK economy has grown for eleven consecutive quarters up to Q3 2015, and shrunk in only two of the last twenty-five quarters since the recession of 2008-9. UK labour market performance remains mixed, as illustrated by real pay decreases, high levels of youth unemployment and an increase in the number of people who are underemployed. London has grown more strongly than the UK as a whole, but despite its successes, the London economy faces challenges particularly in terms of high costs of living creating pressures on low income workers, attracting and retaining the skills the economy needs, and addressing long-term unemployment (SOB 2016).
- 5C17.8 The north of Lambeth is an integral part of London's Central Activities Zone (CAZ), home to significant employers and cultural and tourism assets. Further south are a series of important town centres including Brixton, Clapham, Streatham and West Norwood. Over two-thirds of working Lambeth residents are employed outside the borough. As well as being an important employment location, Lambeth makes a crucial contribution to London's economy as a place where young, highly skilled people live. Over 45% of Lambeth residents are educated to degree level, which is comparable with many inner London boroughs as well as Oxford and Cambridge. Around 14% of residents have no qualifications, which is about average for London. Socio-economic classification gives an indication of socio-economic position based on occupation. About a quarter (26.9%) of Lambeth working age residents are in lower managerial, administrative and professional occupations. This is the largest category. 2.4% of working age residents are long-term unemployed, which is one of the highest in London (SOB 2016).
- 5C17.9 Despite large increases in property prices and rents over the last decade, Lambeth also remains more affordable in comparison with other parts of Central London. However, with housing costs increasingly an issue for those on low-to-middle incomes, it appears as though some lower income residents have moved out of the borough to less expensive locations over the past few years. Clearly, though, those residents who are furthest from the labour market and who live in social housing are less mobile, and there remain pockets of severe deprivation in some parts of the borough (SOB 2016).
- 5C17.10 There are 140,500 people employed in Lambeth, with a significant concentration of jobs in the north of the borough. Employment has grown more slowly in Lambeth than the London average since 2002, while the borough also has a relatively small business base. Self-employment has increased significantly since 2008, particularly among white male residents aged 35 and over, but it is not clear whether this reflects positive choice on the part of residents or a reaction to the recession (SOB 2016).
- 5C17.11 The two biggest sectors in for employment within Lambeth are human health and social work and administrative and support services. The high number of health-

related jobs is linked to a number of large employers located in the borough. This includes a number of significant health-related charities (Marie Curie Cancer Care and Macmillan Cancer Support) and two major hospitals (King's College and Guy's and St. Thomas'). The latter is of particular importance: employment in hospital activities accounted for around 16,000 jobs in Lambeth in 2013, over half (53.7%) of the borough's jobs in health and social work. Administrative and support service activities cover activities that support general business operations and do not focus on the transfer of specialised knowledge. Employment in Lambeth is found across a range of sub-sectors. Security, services to buildings and landscape activities is the most significant, comprising 12,500 jobs, almost two-thirds (64.0%) of employment in the broad sector. The remaining jobs are found in travel agency, tour operator and other reservation service and related activities (900 jobs); rental and leasing and employment activities (2,600); and, office administrative, office support and other business support activities (3,500). Overall, the borough has a relatively large proportion of public sector employment, much higher than for most other Inner London boroughs. At the same time, a lower share of local employment is found in professional and business services, which are expected to be the main driver of jobs growth in London in the next decade (SOB 2016).

- 5C17.12 Waterloo and Vauxhall are set to see developments of national economic significance, with capacity for 23,000 jobs and 5,400 homes to 2031. Much of the new employment in the Central Activities Zone will be in office-based sectors. This coincides with the sectors that are expected to see growth in London over the next two decades and will help to offset declining employment in the public sector in Lambeth. The Council is also committed to supporting regeneration in Brixton, using public sector land and assets as a driver (SOB 2016).
- 5C17.13 Whilst unemployment in 2014 was the lowest in ten years, there was an increase from 6% to 7% in 2015, which is still amongst the lowest in the last decade. However, there is a stark gap in employment rates and incomes between white residents and those from a black and ethnic minority background. Overall, employment rates are significantly higher for white Lambeth residents than for those from Black and Minority Ethnic (BME) backgrounds. In the year to June 2015, 85% of white working age residents were in employment compared to 66% of BME working age residents. The differences in employment rates for areas within Lambeth are closely linked with the ethnic profile of these areas. With 84% of male residents aged 16-64 in employment in the 12 months to June 2015 and 79% of female residents, the gender employment gap in Lambeth (10 percentage points) is significantly lower than that for London (14.4 percentage points). Lambeth had the second highest female employment rate in London in the year to June 2015 (SOB 2016).
- 5C17.14 Lambeth has the highest rate of long-term JSA claimants in London, the second highest level of JSA claimants aged 50 and over, and young people in Lambeth are more likely to claim JSA than the London average. These differences reflect entrenched areas of deprivation in certain parts of the borough, including around Brixton, Stockwell and some parts of the south of the borough (SOB 2016).
- 5C17.15 Over the past decade residents have become increasingly skilled, indicating a profound population shift with more highly skilled people moving to Lambeth. More than six out of ten working age residents were qualified at NVQ Level 4 or above in 2014, up from just over four in ten in 2004. These highly skilled people are attracted to Lambeth by its excellent transport connections which allow them to access job opportunities in the borough and in the London economy more generally (SOB 2016).

5C17.16 Growth in local employment opportunities offers some potential to help lower skilled residents, who often face relatively higher commuting costs. But future employment opportunities will be overwhelmingly in high skilled occupations, with increasingly few employment opportunities in medium and lower skilled occupations. Inequalities in incomes are already high in the borough – median household incomes in the most affluent areas are twice that in the least well-off areas. Over recent years, the jobs profile has been changing towards more highly skilled occupations. The most significant change in Lambeth residents’ occupational profile between 2008 and 2013 was an increase in the share of residents employed in professional (+9.7 percentage points) and associate professional and technical (+7.7 percentage points) roles. There has also been a smaller increase in the percentage of people employed who are working as managers, directors and senior officials (+1.8 percentage points). Again, this corroborates the idea that the borough has seen a significant shift in population, with many higher skilled people moving in who are employed in higher skilled jobs. During the same period, there was also a decline in the proportion of residents working in a range of medium-skilled occupations, including administrative and secretarial jobs (- 2.9 percentage points) and skilled trades (-1.6 percentage points), and a significant decline in the share of residents working in lower skilled occupations, particularly elementary roles (-7.2 percentage points) (SOB 2016).

Occupation profile of employment (% of residents in employment) (2013)



Source: ONS APS

5C17.17 Lambeth’s creative and digital industries sector provide 22,000 jobs and generate £1.8 billion for the economy. This sector includes businesses in design and fashion, crafts, creative tech, games, publishing, film and TV and advertising. They provide significant support and fuel growth in other parts of the economy, such as the visitor and night-time economy, which is one of the borough’s strengths (Lambeth Creative and Digital Industry Strategy 2018).

5C17.18 The business base in Lambeth is comparatively small but the number of new businesses being created in the borough has increased significantly, with 1,445 small business enterprises in the borough. Following the national trend, self-employment and part-time working have both increased in Lambeth and 35,000 Lambeth residents are estimated to be self-employed (Lambeth Investment and Opportunity Strategy 2015).

5C17.19 Lambeth's 30 Key Industrial and Business Areas represent the borough's strategic stock of land for business use. They are well-occupied and provide land for lower value uses, support functions and the growing low-carbon economy (including waste management), as well as growth sectors such as the creative and digital industries and food preparation and distribution (KIBA Review 2018).

Likely evolution without the Draft Revised Lambeth Local Plan

5C17.20 It is important that the Borough protects land used for employment uses. The provisions of the Lambeth Local Plan 2015 provide this protection however; in the absence of the Draft Revised Lambeth Local Plan the adopted Local Plan will be considered out-of-date by 2020. KIBAs and land in business use outside of KIBAs may be lost to other land uses that may not be appropriate in the wider local context. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of draft Policies

5C17.21 This section examines the likely significant effects of implementing the proposed Draft Revised Lambeth Local Plan October 2018 policies on SA Objectives 17 and 19, local economy and tackling worklessness. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

5C17.22 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring	accommodation
D2 – Presumption in favour of sustainable development	ED15 – Employment and training
D3 – Infrastructure	SI2 – New or improved social infrastructure**
D4 – Planning obligations	T1 – Sustainable travel
H2 – Affordable housing	T2 – Walking
H7 – Student housing**	T3 – Cycling
H9 – Hostels and HMOs	T4 – Public transport infrastructure*
H10 – Gypsy and travellers	T5 – River transport*
ED1 – Offices	T8 – Servicing*
ED2 – Affordable workspace	T9 – Mini-cabs, taxis and private hire vehicles*
ED3 – Key Industrial and Business Areas (KIBAs)	T10 – Digital connectivity
ED4 – Non-designated industrial sites	EN4 – Sustainable design and construction*
ED5 – Work-live development	Q9 - Landscaping
ED6 – Railway arches	Q17 – Advertisement and signage*
ED7 – Town centres	PN1 – Waterloo
ED8 – Evening and food and drink uses	PN2 – Vauxhall
ED9 – Public Houses	PN3 – Brixton
ED10 – A2 uses*	PN4 – Streatham
ED11 - Local centres and dispersed local shops*	PN5 – Clapham
ED12 - Markets	PN6 – Stockwell
ED13 – Visitor attractions, leisure, arts and culture uses	PN7 – West Norwood
ED14 – Hotels and other visitor	PN8 – Kennington / Oval
* SA 17 only	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood
	** SA 19 only

Delivery and monitoring policies

5C17.23 It is considered that policies D1 – D4 should result in significant 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 new development continues and remains viable to developers.

Housing policies

5C17.24 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 as well as increased spend from additional households. It is considered that Policy H2 affordable housing should result in positive effects in terms of achieving SA objective 17, particularly in terms of accommodating low income workers. The policy seeks to offer genuinely affordable housing to Lambeth residents (70 per cent of affordable housing provision to be low cost rented homes and 30 per cent intermediate products: London Living Rent or Shared Ownership). Supporting text paragraph 5.15 sets out the council's commitment in ensuring genuine affordability. It is considered the student housing policy indirectly contributes to tackling worklessness by providing affordable accommodation for people studying. Provision of housing may also enable people to live closer to their places of work which could help secure the supply of labour, reducing the time lost to travel, increasing productivity and supporting the economy.

Economic development and town centre policies

5C17.25 Policies ED1, ED2, ED3 and ED4 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. The requirement for office space to be operational at the same time as residential occupation in mixed-use schemes will also serve to create and enhance local vitality and vibrancy by providing new communities with immediate access to employment opportunities and services. 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. KIBAs are Lambeth's 'Locally Significant Sites' and policy ED3 takes a strong position on protecting KIBAs for business, industrial, storage and waste management uses, including green industries and other compatible industrial and commercial uses. The Draft Revised Lambeth Local Plan 2018 limits the use of KIBA land for co-location with residential and other uses to just two sites in the borough: Montford Place and Knollys Yard. The intention is to ensure there is enough land designated for business use. It is considered this policy approach will result in positive effects on the achievement of SA objectives 17 and 19.

5C17.26 Policy ED2 provides good provision for affordable workspace in the borough. It is considered that the policy will help encourage business start-ups and support the growth of business because affordable workspace needs to be provided for a period of at least 15 years (25 years in Brixton Creative Enterprise Zone). **The policy team may wish to consider clarifying that the affordable workspace element should be provided at the same time as other workspace, and in mixed use**

developments, at the same time as residential occupation [SA RECOMMENDATION 95].

- 5C17.27 An Article 4 direction has been in place since 15 September 2017 removing permitted development rights for change of use from B1a office to C3 residential in Brixton town centre, part of Clapham and ten Key Industrial and Business areas (in whole or part). The council is in the process of bringing forward a second Article 4 direction to continue to remove permitted development rights for change of use from B1a office to C3 residential in the whole of the London Central Activities Zone as it relates to Lambeth. If confirmed, this would come into force on 31 May 2019 (the current Article 4 exemption for the CAZ will expire May 2019). This, coupled with the strong policy approach of policies ED1, ED3 and ED4 should result in significant positive effects on the achievement of SA objectives 17 and 19.
- 5C17.28 Policy ED5 recognises that combined work-live units contribute to the range of homes and the range of business premises in the borough and can offer a number of benefits including reduction in traffic, more efficient use of land, minimising business start-up costs and supporting flexible working; and it is anticipated that significant positive effects on the objectives should result.
- 5C17.29 Policy ED6 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, micro-breweries.
- 5C17.30 Policies ED7 and ED11 will likely result in significant positive effects on SA Objectives 17 and 19. The policies seek to ensure town and local 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 ED7 and will help to support 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.
- 5C17.31 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. Proportions of desired retail units are specified for each town centre in the places and neighbourhoods policies, recognising that the blanket approach to town centres is not appropriate. Ensuring adequate retail provision (A1) in primary shopping areas and local centres is considered important for economic and social reasons. On the whole, and taking into account the ratio of primary shopping area within total town centre boundaries as illustrated on the Policies Map, and the social benefits of successful town centres with good proportions of retail offer; it is considered that policies ED7 and ED11 should result in positive effects on the local economy and the tackling of worklessness. However, there is some uncertainty to the future success of high streets. The prevalence of online shopping together with increased rents and business rates is having/may have in future an adverse effect on some high streets and/or some retailers. Some experts believe town centres should be investing in community and leisure centres to draw people back to the high street. While this may result in less traditional shops in future, its likely to result in more places for people to socialise. High streets are increasingly becoming a social hub, where people go to catch up rather than shop (Dr Hart, University of Loughborough). Retailers will increasingly need to offer customers something they can't find online, and make shopping a more social and personal experience.
- 5C17.32 It is considered that the policies (ED7 and ED11) significantly contribute to liveability

and prosperous local economy, particularly to provide local residents with daily needs and services. Provision of residential above ground floor will likely help support local shops and services and therefore positively contributes to SA Objective 17.

5C17.33 Policy ED8 on evening economy and food and drink uses supports such use in town centres and the Lower Marsh / The Cut CAZ frontage. The policy seeks to manage adverse impacts on local amenity arising from these uses. Like A1 retail, desired proportions of A3/A4/A5 uses have been established for each town centre, rather than a blanket approach. It is considered that this town/local centre approach is much more appropriate to the needs to each centre and therefore will more likely result in significant positive effects on SA Objective 17.

5C17.34 Policy ED9 seeks to retain public houses, recognising their economic role contributing to employment generation (SA Objective 19), the local economy and vitality of the area (SA Objective 17). Changes of use, redevelopment and/or demolition of a public house would only be permissible if certain criteria were met (for example, marketing, value to local community).

5C17.35 Policy ED10 seeks to avoid A2 uses, betting shops and payday loan shops dominating centres. The outcome of this will likely be more diverse town centres of enhanced vitality and viability that attract more inward investment and new businesses to local areas, including both larger high street chains and smaller individual shops and boutiques. It is considered that this policy significantly seeks to improve in a positive way the social and environmental performance of business. However, there remains some level of uncertainty given the prevalence of online shopping and its effect on high street shopping.

5C17.36 Policies ED13 and 14 recognise the contribution of visitors and cultural uses to the local economy. These policies also enable improved access to employment generating activities for local residents, thereby contributing to worklessness in the borough and should result in positive effects.

5C17.37 Markets are supported in the Borough through policy ED12 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 and positively contributing to SA Objective 17.

5C17.38 Policy ED15 on employment and training should result in significant positive effects on SA Objective 17 and 19, particularly for young and/or unemployed residents of the borough.

Social infrastructure policy S2

5C17.39 Policy S2 may help contribute to tackling a cause of worklessness as it allows for the use of residential floorspace for childcare use or nursery provided specific tests are met. Similarly development proposals for more than 500 residential units should incorporate suitable childcare provision to meet additional need arising from the development that cannot be met by existing local facilities. Inadequate local childcare can be a cause of worklessness and therefore it is considered that positive effects should result on SA Objective 19.

Transport policies

5C17.40 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. Lambeth 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 17 and 19 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, T5, and T8).

- 5C17.41 Uncertainties in securing funding and delivering public transport improvements such as a new station at Brixton and / or Loughborough Junction providing access to London Overground has potential to adversely impact on the local economy and effective achievement of SA Objectives 17 and 19.
- 5C17.42 Policy T10 on digital connectivity infrastructure ensures the borough keeps pace with technological advances. The policy supports delivery of high quality infrastructure to enable the future expansion of electronic communications networks, including next generation mobile technology and full fibre broadband connection. This is considered critical in sustaining a strong and dynamic local economy.

Environment and open space policies

- 5C17.43 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 the need to incorporate low carbon technologies, achieve BREEAM levels and provision of living roofs and walls and the urban greening factor. 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. Fundamental to the stability of the economy is ensuring a secure energy supply. A secure energy supply enables businesses to function, whilst also reducing reliance on fossil fuels, and thereby mitigates climate change (improving social and environmental performance of business). In order to 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. Demand for 'green' goods and services may stimulate new job opportunities in the borough.
- 5C17.44 Provision of green infrastructure will result in economic benefits to the borough. There is evidence that good quality green spaces can help attract businesses and investment, contribute to employee productivity, and encourage consumer spending. London Metropolitan University's assessment of the impact of green infrastructure in Victoria found that nearly 70% of workers surveyed felt 'happier' being employed in an area with more green spaces (Green Capital, 2016).

Quality of built environment policies

- 5C17.45 High quality well designed commercial buildings are attractive to prospective investors and therefore implemented appropriately, the policies will likely result in significant positive effects on the economic growth of the borough, but also contribute towards a more satisfying environment for workers.
- 5C17.46 Advertisements and signage will be carefully managed through policy Q17, and in order to enhance the environment, renewal of existing large panel advertisements will be resisted. 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

- 5C17.47 Significant positive effects on both SA Objectives 17 and 19 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, healthcare and higher education. Policy PN1 states that at least 50 per cent of original ground-floor units in the primary shopping area of the Lower marsh/The Cut CAZ frontage should be in A1 retail use. Currently 44% of ground floor units are in A1 retail, a decrease from 47.4% in 2017 (Goat 2018).
- 5C17.48 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 (example of implementing policy ED15). The new district centre will provide a range of facilities and services, including at least 25% ground floor A1 retail offer, all of which will contribute to attaining SA Objectives 17 and 19. The retail centre is still growing and establishing; currently there is 18% of ground floor units in A1 retail use, however this is a decrease from the 2017 figure of 22.2% (Goat 2018). Nonetheless, overall, it is considered that regeneration of the Vauxhall area will result in significant positive effects on the local economy and improved employment rates.
- 5C17.49 Policy PN3 for Brixton will result in significant positive effects on SA Objectives 17 and 19 as it supports significant increase in the amount of employment floorspace, and the Creative Enterprise Zone through the promotion and growth of the existing cluster of creative and digital industries active in Brixton. Proportions of A1 retail and food and drink uses are carefully managed, throughout the town centre with different percentages applicable in the indoor markets. All independently accessed upper floorspace in D1 or B1 use will be protected. **For clarity, the policy team may wish to clarify that this protection of D1 and B1 floorspace is for the indoor markets [SA RECOMMENDATION 96].** The Brixton Primary Shopping Area has 71.2% in A1 retail use (Goat 2018), well above policy requirement of 60%. An Article 4 Direction on Brixton town centre prevents change of use from B1(a) to C3 use, resulting in positive effects for the Brixton economy. It is considered that the Brixton policy improves accessibility to employment, especially for local people, and improves employment opportunities among Black, Asian, Ethnic and Minority groups while also supporting and preventing loss of local businesses, and encouraging business start-ups and the growth of businesses. Accordingly, significant positive effects on SA objectives 17 and 19 are expected.
- 5C17.50 On the whole positive effects for the local economy and workless population should result from policy PN4 for Streatham. Regeneration to create a vibrant and viable town centre with a mixed and balanced economy including retail, leisure, offices, hotels and housing together with investment in public realm and public transport will likely result in significant positive effects for Streatham with regards to SA objectives 17 and 19. It is noted that Draft Revised Lambeth Local Plan October 2018 para 11.90 states that 'Streatham has experienced high levels of loss of office space through permitted development rights and this lack of offices and a comparative shortage of suitable SME workspace presents a challenge for growth in Streatham's

employment offer'. **The policy team may wish to reconsider whether policy PN4 adequately seeks to redress this challenge to Streatham's employment offer. It is recognised that policy ED1 applies to Streatham, but perhaps there is scope to reinforce the support for office floorspace in the Streatham policy [SA RECOMMENDATION 97].** Both Streatham Hill Primary Shopping Area and Streatham Central Primary Shopping Area have around 50% ground floor units in A1 retail, in line with policy PN4. Streatham Hill has 25% in A3/A4/A5 use while Streatham Central has 14% in food and drink use (Goad 2018).

- 5C17.51 Clapham town centre has reached saturation point for food and drink uses, and therefore no further pubs, bars and hot food takeaways are permitted for this centre. Currently 32% is in food and drink use across whole district centre (and 40% in A1 retail in the Clapham Primary Shopping Area (Goad 2018)). At least 50% of ground floor units in the primary shopping area need to be in A1 retail use to help redress the balance of retail and non-retail uses in the centre. In time, this should result in a stronger local economy with improved social and environmental business performance (more retail needs being met within the centre and within the borough). 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 jobs in hospitality.
- 5C17.52 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, particularly small business space suitable for creative and digital industries. 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. Retail is encouraged, whereby no fewer than 50% of original ground floor units in primary shopping area should be in A1 use. There is currently 61.5% in A1 retail use in the Stockwell District Primary Shopping Area (Goad 2018).
- 5C17.53 Policy PN7 for West Norwood promotes retail-led mixed use development. The West Norwood Commercial Area seeks to protect Lambeth's largest KIBA whilst supporting opportunities to create a hub of creative enterprise, innovation and industry. Part of Norwood High Street is designated as a Creative Enterprise Zone (CEZ) to redefine and revitalise the role of Norwood High Street for creative and digital enterprises. The West Norwood Primary Shopping Area contains 54% in A1 retail use, slightly more than policy requirements which indicates good health for the local economy. Overall it is considered that the policy contains strong ambition to sustain and improve the local economy and should result in significant positive effects with respects to SA objectives 17 and 19.
- 5C17.54 Policy PN8 for Kennington / Oval seeks to support growth to make it an important area for residential and employment. It seeks to protect and intensify the areas KIBAs and 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.
- 5C17.55 It is considered that development in line with policies PN7 and PN8 should provide access to employment for some local people although significant improvements are not likely to be expected. Causes of worklessness have generally not been addressed in great depth.
- 5C17.56 Herne Hill, Loughborough Junction and Upper Norwood policies seek to provide retail

and appropriate town centre uses. Like other small district centres, Herne Hill and Upper Norwood seek no less than 50% ground floor units in A1 retail and no more than 25% in A3/A4/A5 food and drink use. Currently 43% of ground floor units are in A1 retail use (Goad 2018). Growth of the creative and digital industries is supported in all three of these places/neighbourhoods. 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 in particular applications which bring back into use vacant and/or dilapidated railway arches and workspaces will be supported. Public realm improvements are supported and these can help attract business investment. It is considered 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 known for its high levels of deprivation.

5C17.57 Overall, it is considered that the approach requiring different percentages of retail (i.e. no fewer than 60% in major centres; no fewer than 50% in smaller centres) and food and drink uses for different centres will likely result in significant positive effects for SA Objectives 17 and 19, but also on social SA Objectives such as health, liveability, services and travel. Nevertheless it should also be pointed out that there is some element of economic risk to this. It could be argued that control of ground floor town centre uses (e.g. A use classes) should be managed through market demand. There is also some current uncertainty on the 'future of the high street' given the increased use of online shopping. In order to combat the demise of retail on the high street it is considered that strong policy requirements need to be in place. The policies have been developed based on a robust evidence base specific for the borough, and it is therefore considered that this risk to the local economy is low. Positively, a number of centres meet or exceed policy targets for A1 retail use: Brixton, Streatham, Stockwell and West Norwood. The centres that fall below policy requirements include Lower Marsh/The Cut CAZ Frontage Primary Shopping Area, Vauxhall, Clapham Primary Shopping Area and Herne Hill.

5C18.30 **Summary of Draft Revised Lambeth Local Plan October 2018 policies**
Overall, and taking into account the criteria outlined in the Sustainability Framework, it is considered that the draft revised Local Plan seeks to create and sustain prosperity and business growth and increase the amount of and access to employment generating activities.

Table 32: Summary assessment of effects of Local Plan on economy and worklessness

Assessment of effects of the Local Plan on SA objectives 17 & 19	Score without 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>On the whole and taking into account the extent planning policy can offer all residents rewarding, well located and satisfying employment; it is considered that the Draft Revised Lambeth Local Plan October 2018 will have significant positive effects on these SA Objectives, existing baseline conditions and key sustainability issues on employment and economy as outlined in Table 4. While the borough does not have London Plan designated Strategic Industrial Land, the Draft Revised Lambeth 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 new construction, 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 and attract a range of different industries, including growth of creative and digital industries. All Opportunity Areas and major town centres (including those close to areas of high deprivation) promote mixed use development support existing town and local centres and provide appropriate, accessible land to support employment.</p> <p>However, there is a small level of uncertainty whether the strong retail drive of town centres will result in significant positive effects in the short term given current economic uncertainty (regarding Brexit) and the increase in online shopping. However, positively Brixton, Streatham Stockwell and West Norwood are meeting or exceeding policy targets for A1 retail use. An element of uncertainty also exists on how market forces will impact employment rates and the local economy, given current economic hardship.</p>	<p>Significant 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. Significant 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.. 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. Any increases in the number of A1 retail premises may correspond to changes in the way consumers use high streets and online shopping habits will likely impact levels of retail on the high street, and therefore the positive effects on the borough's economy will likely</p>	Permanent

				be evident in the medium term and beyond as changes in the way we shop and use high street evolve.	
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Recommendations for monitoring likely significant and uncertain effects

5C17.58 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Net change in B1a floorspace through completed developments
- Net loss of B1a floorspace through completed Prior Approval developments (ie permitted development for change of use from office to residential)
- Proportion of major application approvals that make provision for Affordable Workspace (in parts of borough covered by policy ED2)
- Net change in completed B1b, B1c, B2 and B8 floorspace in KIBAs and outside KIBAs
- Proportion of original ground floor units in A1 retail use in
 - a) i) Lower Marsh/The Cut CAZ Frontage
 - ii) Streatham Primary Shopping Area
 - iii) Clapham Primary Shopping Area.
 - b) Vauxhall District Centre.
 - c) Brixton Primary Shopping area
- Proportion of vacant units in Brixton and Streatham Major centres, Clapham, Vauxhall and West Norwood District centres and Lower Marsh/The Cut CAZ Frontage
- Proportion of original ground floor units in A3/A4/A5 food and drink use in
 - i) Streatham;
 - ii) Clapham; and
 - iii) Brixton Primary Shopping Areas
- Proportion of original ground floor units in A3/A4/A5 food & drink or nightclub use in Brixton Evening Economy management area
- Net additional visitor accommodation bedspaces
- Unemployment rates
- Number of businesses registered in the borough
- Number of vacant premises in town centres
- Total amount of additional employment floor-space, by type
- Total amount of employment floor-space, by type
- Total amount of floor-space for 'town centre uses'

5C18. REGENERATION AND EFFICIENT USE OF LAND

5C18.1 This section of the SA relates to the sustainability performance of the Local Plan against:

Objective 18: 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, taking into account constraints such as contaminated land.

5C18.2 To achieve this objective, plan policies should have benefits to the most deprived areas and communities; help make people feel positive about the area they live in; help reduce the number of vacant and derelict buildings; make best use of scarce land resources and reuse brownfield sites; 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.

Relevant policy objectives

National Level

5C18.3 *National Planning Policy Framework 2018* states that policies should support development that makes efficient use of land. Policies should promote the effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or brownfield land. Planning policies should encourage multiple benefits from urban land; recognise that some undeveloped land can perform many functions; give substantial weight to the value of using brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; promote and support the development of under-utilised land and buildings (para 118).

Regional Level

5C18.4 The draft *London Plan (2018)* contains a number of policies applicable to efficient use of land and regeneration. Policy GG2 is on making the best use of land. In delivering good design, it is necessary to determine the capacity for growth; the outcome of the process must ensure the most efficient use of land is made so that development on all sites is optimised. Policy D6 Optimising density states that development must make the most efficient use of land, and policy H4 Meanwhile uses as housing states that boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development. Sites with industrial land-uses are also encouraged to make more efficient use of land. The draft London Plan identifies Opportunity Areas (significant locations with development capacity to accommodate new housing, commercial development and infrastructure, linked to existing or potential improvements in public transport connectivity and capacity. Many Opportunity Area overlap with Strategic Areas for Regeneration.

Baseline conditions and existing issues

5C18.5 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.

- 5C18.6 The London Plan **Opportunity Areas** of Waterloo and Vauxhall present continued potential for commercial development and jobs growth in the borough, alongside their potential to provide new housing. Waterloo is a major office location, one of the capital's most successful tourist areas and an international centre for culture and the arts. Vauxhall is undergoing rapid change linked to the wider regeneration of Battersea/Nine Elms. Both areas can make an even greater contribution to the central London economy than they already do, if they are planned and managed effectively as part of the London Plan Central Activities Zone, in partnership with key stakeholders.
- 5C18.7 However, this will not happen unless the capacity of the public transport infrastructure servicing these areas also grows at a sufficient rate to meet the increased demand generated by new development. Although both areas are served by major transport interchange, these are already operating at capacity. Major developers will be expected to contribute to meeting the cost of increasing capacity in order to mitigate the impact of their schemes. This will be alongside significant public sector investment (Vauxhall Area SPD 2013). The new Nine Elms Station in Lambeth that will bring the Northern line to the Vauxhall area will improve transport connections and open up a range of opportunities for the borough's residents and businesses that would not otherwise come forward. Developers providing new jobs will also be expected to contribute to programmes of support for Lambeth's unemployed or economically inactive residents, so that their chances of accessing these opportunities increase.

Likely evolution without the Draft Revised Lambeth Local Plan October 2018

- 5C18.8 In the absence of the draft revised 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). If the Council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the Council's ability to guide and shape investment and development will be significantly diminished.

Assessment of draft Policies

- 5C18.9 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 18 Regeneration and efficient use of land. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft revised Plan on the objective. This review takes account of mitigation already included within the draft Plan.
- 5C18.10 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	H6 – Residential conversions
D2 – Presumption in favour of sustainable development	H7 – Student housing
D3 – Infrastructure	H10 – Gypsy and Traveller needs
D4 – Planning obligations	H11 – Estate regeneration
H1 – Maximising housing delivery	H12 – Build to rent
H2 – Delivering affordable housing	H13 – Shared living
H3 – Safeguarding existing housing	ED1 – Offices
H4 – Housing mix in new developments	ED2 – Affordable workspace
H5 – Housing standards	ED3 – Key Industrial and Business Areas (KIBAs)

ED2 – Business uses outside KIBAs	EN7 – Sustainable waste management
ED3 – Large offices	Q6 – Urban design / public realm
ED4 – Non-designated industrial land	Q7 – Urban design / new development
ED5 – Work-live development	Q9 – Landscaping
ED6 – Railway arches	Q17 – Advertisement and signage
ED7 – Town centres	Q20 – Statutory listed buildings
ED11 – Local centres and dispersed local shops	Q22 – Conservation Areas
S11 – Safeguarding existing social infrastructure	Q26 – Tall buildings
S12 – New or improved social infrastructure	PN1 – Waterloo
S13 – Schools	PN2 – Vauxhall
T1 – Sustainable travel	PN3 – Brixton
T7 – Parking	PN4 – Streatham
T10 – Telecommunications	PN5 – Clapham
EN1 – Open space	PN6 – Stockwell
EN2 – Local food growing and production	PN7 – West Norwood
EN4 – Sustainable design and construction	PN8 – Kennington / Oval
EN5 – Flood risk	PN9 – Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood

Delivery and monitoring policies

- 5C18.11 Policy D1 ensures the council will work with a range of partners to explore regeneration opportunities, and that use of previously developed land and vacant buildings are optimised. 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 18 as they seek to optimise previously used land, and tackle areas of deprivations (i.e. identified regeneration areas and town centres) while promoting and maintaining mixed, balanced and diverse communities within neighbourhoods.

Housing policies

- 5C18.12 Housing policies promote new housing delivery and estate renewal and regeneration schemes. Housing density should be optimised in accordance with the design-led approach set out in London Plan policy D6. Proposals that bring back into use long-term empty homes and derelict homes are supported by policy H3. Housing developments will need to incorporate affordable housing provision (major developments only), 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 identifies that future need of pitches can be accommodated through managing the churn in vacant pitches on the existing traveller site in Streatham Vale, thereby maximising efficient use of the existing site. Any new site proposed is economically, socially and environmentally sustainable and it is considered that the criteria for new sites seek to maximise benefits for this community. Overall it is considered that policy H11 on estate regeneration will benefit the most deprived areas and communities, help people feel positive about the area they live in, and make the best use of land. SA recommendation 25 on provision of social infrastructure on or near estate regeneration schemes is further supported with respect to achieving SA objective 18. Build to rent and shared living products offer housing options that will potentially appeal to different types of people/communities. It is considered that policy H13 of large-scale purpose built shared living will result in efficient use of land in Waterloo and Vauxhall, provided there is a market for this type of housing. Overall it is considered the housing policies will result in significant positive effects on SA 18.

Economic development and town centre policies

- 5C18.13 Policy ED1 seeks to protect office floorspace and as such redevelopment of offices for a mix of uses will be supported if the quantity of original B1 floorspace is replaced or increased as part of the development or elsewhere in the vicinity within Lambeth. Proposals involving a net loss of office floorspace will not be supported unless certain tests are met, one of which is that the floorspace has been vacant and continuously marketed for a period of at least two years. It is noted that this is an increase of an additional one year to current adopted Local Plan policy. While it is recognised that this additional time seeks to ensure there is no demand for office floorspace, it can also be argued as an inefficient use of land/building space. **The policy team may wish to consider providing for meanwhile uses of such vacant office floorspace, (perhaps through supporting text) or provide some sort of incentive for applicants that allow use of office to be temporarily used for another use for the two years while being continuously and actively marketed as available office floorspace [SA RECOMMENDATION 98].**
- 5C18.14 Provision of affordable workspace (policy ED2) seeks to benefit deprived communities, and help them feel positive about the area they live/work in.
- 5C18.15 While policy ED3 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 ED4 seeks to intensify industrial uses on non-designated industrial sites and mixed-use or residential development on these sites will only be supported in line with criteria set out in London Plan policy E7. Taking into account all land in the borough and the different land-uses required it is considered policy ED4 promotes efficient, innovative and multifunctional use of land.
- 5C18.16 Policy ED5 of work-live development states that change of use of work-live accommodation to residential use will not be permitted. On the one hand, work-live is an efficient use of land. However, on the other hand the policy makes no allowance for marketing evidence that demonstrates no demand for the work element of the work-live accommodation. If there is no demand for the work component of an existing work-live site, it may be considered an inefficient use of land, particularly when there are other issues facing the borough such as supply of larger family size homes. This concern has raised in previous SA work and the response was that the approach is intentional as historically changes of use from work-live have resulted in an incremental loss of employment uses to residential. The policy team may wish to again be satisfied with their policy position and previous response.
- 5C18.17 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. Diversifying the retail sector, encouraging small shops and promoting town centre development are likely to contribute positively to SA 18.

Social infrastructure policies

- 5C18.18 Policies S1 – S3 should result in positive effects on SA Objective 18. Existing community premises are to be safeguarded for the most efficient use of the premises addressing changing needs and priorities of the community. New or improved community premises need to be flexible, adaptable and sited to maximise shared community use of premises. Appropriate provision of social infrastructure to meet additional need that will arise from development helps people feel positive about the area they live in. Making new sports and leisure facilities within hotels and purpose-built student housing or shared living available to the community is an effective approach to maximising the use of land. 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

5C18.19 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 as well as health benefits. 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 limiting car parking provision (less than London Plan requirements).

Environment and open space policies

5C18.20 Open space and green infrastructure policies should result in significant 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 and green infrastructure 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 and green infrastructure, 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, including the temporary use of vacant or derelict land or buildings and the use of incidental open space on housing estates and other open space areas.

5C18.21 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 seeks to improve the soil resource by requiring adequate remedial treatment of any contaminated land prior to development commencing. This also has associated health benefits for construction workers and occupiers of development.

5C18.22 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 (albeit outside of the borough).

Quality of built environment policies

5C18.23 It is considered that urban design policies on both public realm and new developments should result in significant positive effects on SA Objective 18, 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 or if appropriate food growing.

5C18.24 The draft Local Plan contains policies that seek to bring heritage assets back into viable use and good repair (policies Q18 and Q20) and this is supported with respect to SA Objective 18.

5C18.25 Tall buildings (policy Q26) 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.

Places and neighbourhoods policies

5C18.26 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 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. 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 The Creative Enterprise Zone, creative, digital and green sectors, and promotes improvements to public realm. This can promote more regeneration of areas by acting as a focal point to attract more investment.

5C18.27 Mixed use developments are proposed for all major centres and public realm improvements are provided for in all of the policies PN1- PN11. As highlighted above, such improvements may help stimulate regeneration in other adjacent deprived areas. Policy PN5 on Clapham, policy PN8 on Oval both seek retention (and reuse) of specific buildings. Policies PN6 for Stockwell and PN7 West Norwood 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 and sense of place.

Summary of Draft Revised Lambeth Local Plan October 2018 policies

5C18.28 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is considered that the draft revised Local Plan seeks efficient use of land resource and stimulates regeneration that maximises benefits to the most deprived areas and communities.

Table 33: Summary assessment of effects of Local Plan on regeneration

Assessment of effects of the Local Plan on SA objective 18	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 Draft Revised Lambeth Local Plan October 2018 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 draft 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>The SA recommends reconsideration of the two-year marketing period for loss of office floorspace. Current adopted Local Plan policy only requires one year of marketing. Floorspace that is vacant for two years may be considered an inefficient use of land. The policy team may wish to consider incorporating meanwhile uses into the policy or offering some sort of incentive where floorspace is temporarily used for another land use during the continuous two-year marketing period.</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 will likely occur in short term for some sites (that already have planning permissions) and between mid to long term relative to the current difficult economic climate/labour availability due to Brexit.</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.

Recommendations for monitoring likely significant effects

5C18.29 It is recommended that the following indicators are used to monitor the effects of the Draft Revised Lambeth 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.
- Housing supply: number of net additional dwellings completed

6 SUMMARY AND CONCLUSIONS

The Draft Revised Lambeth Local Plan October 2018

- 6.1 The current Lambeth Local Plan was adopted by the Council in September 2015, following a statutory process of preparation and examination. The Inspector for the Local Plan examination found it sound subject to early review to take account of the higher borough-level housing target in the Further Alterations to the London Plan 2015, which had been published too late to be included in Lambeth's Local Plan 2015. In May 2016 the new Mayor of London was elected and he immediately initiated a full review of the London Plan. This will replace the version referred to in the Lambeth Local Plan Inspector's report, so the impetus for review of the Lambeth Local Plan changed: it now needs to address changes in the emerging new London Plan rather than the alterations to the previous London Plan.
- 6.2 In addition, since September 2015 there have been a number of significant changes to the national planning policy and legislative context, and others are emerging. These include the Housing and Planning Act 2016, the introduction of permissions in principle, ongoing changes to permitted development rights, national commissions into the local plan making process, consultation on the changes to the National Planning Policy Framework, the Neighbourhood Planning Act 2017, the Housing White Paper 2017 and consultation on the policy approach to Build to Rent. The government is expected to publish a revised National Planning Policy Framework by Autumn 2018. These changes will also need to be addressed by the review of the Lambeth Local Plan.
- 6.3 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 2035. It is based on the social, economic and environmental objectives and priorities of the Lambeth Borough Plan 2016-2021, together with other relevant plans, programmes and strategies all of which have implications for the development and land use within the borough.
- 6.4 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.
- 6.5 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.
- 6.6 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 100 people living in each hectare, more than twice the London population density. Nearly a third of a million people live in Lambeth – at least 318,000. It has a complex social and ethnic mix, with large African and Portuguese populations, and is an important focus for the UK black Caribbean population. The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. Lambeth is the 8th most deprived borough in London and 22nd most deprived in England. This is an improved relative position

since 2010 when Lambeth was ranked as the 14th most deprived authority in England. The most deprived places in the borough are mostly in Brixton and Stockwell, with some in Knight's Hill.

- 6.7 Public transport provision in the Borough is generally good for non-disabled people but less good for those with disabilities or access needs. There are 14 over-ground 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.
- 6.8 The Draft Revised Lambeth Local Plan October 2018 sets out the strategic approach to planning for development in the borough up until 2035. The spatial strategy, vision and strategic objectives largely remain unchanged from the current Lambeth Local Plan 2015. Some significant areas of proposed policy change include:
- Inclusion of the emerging new London Plan borough-level housing target of 1,589 net additional dwellings per annum in Lambeth, with policies to support delivery of this target, including on smaller sites
 - Removal of requirements for affordable housing small sites contributions due to publication of new NPPF 2018.
 - Cross-reference to the new London Plan threshold approach to affordable housing, whereby major development proposals that meet London Plan-set thresholds for affordable housing and other Local Plan policy requirements can follow a 'Fast Track Approach' without viability testing at planning application stage
 - Change in the approach to managing residential conversions away from streets designated as 'under conversion stress' to introduction of a minimum size threshold of 150m² across the borough, plus a requirement to include a family-sized flat in converted dwellings and clear restrictions on parking permits and on-street parking. This is in response to the Draft London Plan 2017's emphasis on new housing supply from small sites, including conversions, whilst maintaining a managed approach.
 - A new policy specifically relating to estate regeneration schemes
 - Stronger protection for existing office floorspace and clear support for new floorspace to support economic growth in the borough
 - A new policy requiring major office schemes in the north and centre of the borough (including in the proposed new Brixton Creative Enterprise Zone) to provide affordable workspace for smaller creative and digital enterprises
 - Additions to the policy on A2 uses to introduce specific controls on the number and concentration of betting shops and payday loan shops, which are now *sui generis* uses.
 - Changes to the policy on hotels to clarify where they will and will not be supported, in accordance with the approach in the new London Plan: this

includes no support for additional hotels in Waterloo, where there is a significant existing cluster, but support in principle for hotels in town centres elsewhere in the borough; limiting the number of hotel rooms that can be delivered in Vauxhall between 2019/20 and 2034/35; and inclusion of a new requirement for hotel proposals to include a visitor management plan and planning obligations to mitigate any negative impacts.

- A full update of the policy on employment and skills to incorporate the new approach adopted in the Lambeth Employment and Skills SPD 2018.
- Reworked transport policies to support delivery of the emerging Lambeth Transport Strategy, including Healthy Streets and a significant modal shift to walking and cycling
- In policy S2 New or improved social infrastructure: a new requirement for new D2 sports and leisure uses provided alongside hotels, student housing and shared-living schemes to be made available for public access; and an expanded requirement for larger residential schemes to assess impacts on social infrastructure and include provision to meet additional need or make a payment in lieu, and to cover management and maintenance costs
- A commitment to apply the emerging new London Plan policy on air quality to development proposals in Lambeth, also supported by a stronger emphasis on urban greening (urban greening factor).
- A re-working of the policy on development in gardens to provide greater clarity on how development proposals in rear gardens will be treated.
- A new clause to resist development on or in the River Thames.
- Re-framing of the tall buildings policy to meet the requirements of the new London Plan by specifying appropriate locations and building heights.
- A new policy dedicated to basement development, as required by the new London Plan; this brings together all policy on basements in one place in the Draft Revised Local Plan.
- Update of policies and introductory text to take account of the current vision and aspirations for each area and include more consistent references to air quality focus areas, open space deficiency areas, strategic areas of regeneration, business improvement districts and emerging neighbourhood plans.
- Designation of a Creative Enterprise Zone in Brixton to promote growth in the existing cluster of creative and digital industries and enable a specific approach to securing affordable workspace.
- Continue to safeguard retail uses in Streatham but require no fewer than 50 per cent of ground floor units in each of the primary shopping areas to be in A1 use (change from 60 per cent).
- Encouraging an area-wide approach to investment and growth in Kennington/Oval to ensure integration with neighbouring opportunity areas

and supporting high quality regeneration of the Oval gasworks and adjacent Tesco sites.

- Introduction of a Creative Enterprise Zone in West Norwood to complement the adjacent Commercial Area by supporting mixed-use developments that deliver ground floor workspace for makers and creative and digital enterprises.
- Supporting the implementation of the Loughborough Junction masterplan and identifying opportunities for the comprehensive refurbishment and conversion of the Rathgar Road railway arches.
- Protection for Cooper's Yard Studios in Upper Norwood for cultural, creative and digital uses.

- 6.10 The Draft Revised Lambeth Local Plan October 2018 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 major developments will need to incorporate genuinely affordable housing (70 per cent low cost rented homes and 30 per cent intermediate products (e.g. London Living Rent, Shared Ownership).
- 6.11 The Draft Revised Lambeth Local Plan October 2018 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 for 10 or more children will need to incorporate children's play area; residential schemes of 500 units or more will need to assess impacts on social infrastructure and include provision to meet additional need or make a payment in lieu; 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.
- 6.12 The borough's natural, cultural and archaeological heritage is well provided for in the Draft Revised Lambeth Local Plan. Views to the World Heritage Site as well as the vast number of Conservation Areas, listed buildings and their settings, archaeology, and open green spaces will be appropriately protected during the plan period.
- 6.13 Developments will be well designed both socially in terms of social inclusion, accessibility, safety and reduced fear of crime; and environmentally, in terms of increased provision of green infrastructure, improved air quality, water efficiency, waste management and recycling, climate change adaptation, and more efficient use of natural resources including land.
- 6.14 On the whole, it is considered that the Draft Revised Lambeth Local Plan has been produced with the premise of sustainable patterns of urban development actively borne in mind. Where appropriate, the SA has identified areas for policy improvement to either increase positive effects or mitigate potential adverse effects. These are identified as SA recommendations. A total of 98 have been made on the SA of the

Draft Revised Lambeth Local Plan October 2018 (see Appendix 1).

- 6.15 Deliverability is a key issue for the Draft Revised Lambeth Local Plan, particularly with regards to current uncertainty on the terms under which the UK will leave the EU (its impact on labour force, construction, investment in Lambeth for example). 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 it. For example significant redevelopment in Vauxhall is requiring additional improvements to public transport infrastructure in particular addressing capacity and accessibility. The Northern Line extension to Nine Elms will likely alleviate overcrowding issues on the northern line and provide more accessible public transportation however this is being delivered after occupation of new surrounding developments. New overground stations are required at Brixton and/or Loughborough Junction. It is probable that population growth will precede any new public transport infrastructure, as developments are completed and occupied. There are funding gaps for a number of transport/public realm infrastructure projects, for example new platforms to provide interchange with the Overground in Brixton/Loughborough Junction area, platform lengthening at Wandsworth Road and Clapham High Street, step-free access at Brixton, Streatham and Tulse Hill Rail Stations. Therefore, there is a potential negative cumulative effect (at least in the short term) of development in Lambeth and neighbouring boroughs, on the capacity on public transport networks, arising from the resultant population increase. Capacity issues in Lambeth could be exacerbated by development in neighbouring areas, for example, further along the Victoria and Northern Underground Lines. This could in turn exacerbate capacity issues elsewhere in central London. It is unclear in the Draft Revised Lambeth Local Plan how much development can occur if particular infrastructure projects are not delivered.
- 6.16 Reasonable alternative (RA) approaches have been considered in the Draft Revised Lambeth Local Plan October 2018 plan-making process for the key issues considered in the partial review: housing growth and infrastructure; affordable housing; housing for older people; self-build housing; business and jobs; town centres; hotels; waste; air quality; and transport. These issues were explored through a series of topic papers and questions to help facilitate consultation and feedback, with links to further evidence where relevant. The topic papers identified different possible ways (reasonable alternatives) of addressing the key issues. An SA was prepared on the reasonable alternatives (see Appendix 2) identified in the topic papers/online surveys against the sustainability objectives (SA Framework) that were developed as part of the Scoping Report process. The results of the SA work on the issues and reasonable alternatives has helped inform the Draft Revised Lambeth Local Plan October 2018 (see section 5B above for more detail).

Sustainability Effects

- 6.18 Overall, and in so far as planning can influence particular areas, it is considered that the Draft Revised Lambeth Local Plan October 2018, together with SA recommendations, provides the policy framework to generally result in positive effects for the borough and upon baseline characteristics but as outlined above, deliverability of key infrastructure is a concern weighted with uncertainty. Table 34 shows the sustainability effects of the Plan for each SA Objective.
- 6.19 Effects arising from large development projects (for example, building more homes, intensifying industrial land-use) may be positive or negative. These effects may occur as a result of individual developments or cumulatively alongside other developments.

The negative effects may include added strain on natural resources (e.g. water resources, air quality, access to open space), pressure to build in areas of high flood risk and an increase in the volume of municipal waste. However, the Draft Revised Lambeth Local Plan, together with the London Plan contains policies to manage and mitigate such effects. Consequently, so far as the local planning policy can influence, no significant detrimental effects are anticipated to occur as a result of this draft revised plan. However, given the level of uncertainty in how some policies will be implemented and deliverability of necessary infrastructure to support growth; it is important to develop an effective monitoring regime to review the impacts and effectiveness of policy over time.

6.21 It is considered that previous SA conclusions of the vision and objectives remains valid and can be summarised as follows:

The vision and strategic objectives portray a sustainable approach to the Borough's future development. There is a balanced approach to social, environmental and economic issues and a real desire to tackle climate change (mitigation and adaptation), address infrastructure issues, provide local jobs and services and promote sustainable modes of travel. However, there remain uncertainties about the delivery of essential infrastructure required for growth, in particular:

- *Timing: there is a danger that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front;*
- *Funding for some of the proposed infrastructure schemes has not been identified;*
- *The proportion of open space per resident ('green infrastructure') is likely to reduce as the population increases whilst new open space opportunities are extremely limited.*

Table 34: Summary of SA scores

SA OBJECTIVE	SA SCORE
1. Ensuring safe communities with reduced crime and disorder	++
2. Promote a healthy borough, by reducing health inequalities and 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. Ensuring 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 promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++/?
8. 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.	++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++/?

10. To protect, enhance and promote biodiversity, and to bring nature closer to people.	++/?
11. To create, manage and enhance green infrastructure.	++/?
12. 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.	+/?
13. 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.	+/?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	+/?
15. To improve air quality	?/+
16. To maximise the education and skills levels of the population.	+
17. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	++/?
18. 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, taking into account constraints such as contaminated land.	++
19. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++/?

- 6.22 A total of 98 recommendations have been made in this SA with the aim of improving the impact of policies on sustainability or reducing potential for negative effects. Many involve clarifying policy intent and/or tweaking wording to improve outcomes for sustainability objectives. There are a few recommendations that seek to ensure better safety and health outcomes for people in the borough (for example policies on estate regeneration, parking, urban design, walking, cycling and Clapham). There are recommendations that seek to include more references to air quality for a range of policies (for example policies on open space, trees, landscaping and places and neighbourhoods). Some recommendations will likely result in more positive effects for a number of different SA Objectives. For example allowing provision of new social infrastructure within walking distance (rather than just on-site as currently proposed) of the development site (policy S2) would maximise positive effects for SA objectives 3, 4, 5, and 7. For more equitable outcomes across all groups of people, it is recommended that leisure facilities are made available for general public use, rather than just those groups identified by the council (policy S2). This would also result in more positive effects on SA Objectives 3, 5, 7). Appendix 1 provides the full schedule of SA recommendations. The policy team will review all recommendations and provide a response to each in preparing the proposed submission version of the revised Lambeth Local Plan.
- 6.23 It is important to note judgements were made taking into account the 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 Revised 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 hospitals, the NHS and individual lifestyle choices; but it was considered that the extent to which the draft Local Plan can play a role in attaining SA Objective 2, should lead to significant positive effects.
- 6.24 For some of the SA Objectives, the Draft Revised Lambeth Local Plan October 2018 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, new station at Brixton and/or Loughborough Junction for the London Overground, improved step-free access at several stations), but also with respect to other growth and investment in the borough under the current difficult economic climate and

the current uncertainty on Brexit negotiations.

Conclusion

- 6.25 Taking into account the findings of the SA, it is considered that the Draft Revised Lambeth Local Plan October 2018 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 Revised Lambeth Local Plan October 2018 successfully achieves a balance between the need to protect the natural environment, with meeting social and economic needs.
- 6.26 The Draft Revised Lambeth Local Plan aims to achieve high standards in the quality of development and contains many provisions that seek to mitigate or avoid negative effects on the natural environment. It is considered that the impacts of 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 the protective nature of policies that avoid or mitigate significant adverse effects.
- It is considered that increases in carbon emissions and water use associated with increased population growth need to be weighed and considered against the social and economic benefits that growth brings to the borough. 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 considered holistically against relative increases in emissions, taking into account mitigation measures that seek to reduce the amount of emissions. Draft Revised Lambeth Local Plan October 2018 policies seek to minimise effects associated with projected growth. Generally, the SA found that the DRLLP policies aspire to achieve significant positive social, environmental, health and economic effects and avoid or mitigate significant adverse effects.
- 6.27 Overall, it is considered that the Draft Revised Lambeth Local Plan October 2018 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.