

Appendix 1: SA Recommendations and policy response

Table 1: SA recommendations made on the DRLLP SPV 2020 and policy officer response

Number	SA recommendation	SA commentary para	Section	Policy	Officer response	Proposed change
SA1	It is recommended that policy ED13 on visitor attractions, leisure, arts and cultural uses would benefit from cross-referencing to policy Q3.	5C1.27	6	ED13	Accepted	The following text has been added to the end of DRLLP PSV paragraph 6.90: 'All proposals should address the requirements of public safety set out in policy Q3'.
SA2	It is still not convincing that amendments made as a result of previous SA recommendation will be interpreted in ways that result in actual improved useability of communal outdoor spaces, for example through use of outdoor seating, and other outdoor pieces that promote play, tranquil reflection, and connection with nature. Table 3.2 of the London Plan includes the following text, and it is recommended this is also included in policy H5: 'be designed to support an appropriate balance of informal social activity and play opportunities for various age groups'.	5C2.29	5	H5	Accepted.	Policy H5(c)(vii) addition to read: 'be designed to support an appropriate balance of informal social activity and play opportunities for various age groups'.
SA3	The DRLLP PSV refers to wheelchair accessibility for student housing and students with disabilities but not general housing. It is recommended there is explicit reference to wheelchair accessible homes to policy H5.	5C5.52	5	H5	Accepted.	The following text has been added to policy H5(a): iii) meet the requirements for accessible housing in London Plan policy D5.

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SA4	It is considered that policy H5(d) could be strengthened so that it appropriately refers to 'inclusive' as well as 'accessible' play space.	5C5.52	5	H5	Accepted.	Last sentence of clause (d) has been amended as follows: 'Play areas should be inclusive and accessible to all residents of the development irrespective of tenure.'
SA5	That the social value of markets be recognised.	5C5.56	6	ED12	Accepted.	Amend 1 st sentence of supporting text para 6.87 as follows: 'Markets add to the vibrancy, <u>social value</u> and character of local areas.'
SA6	For explicit consideration of social inclusion/cohesion the following could be added to policy S2(a)(iii): 'buildings and facilities are designed to be flexible, adaptable, <u>promote social inclusion and be</u> sited to maximise shared community use of premises, where practical.' Policy EN1 or its supporting text could also refer to social inclusion.	5C5.57	7	S2	Accepted.	Policy S2(a)(iii) as been amended as follows: buildings and facilities are designed to be flexible, adaptable, <u>promote social inclusion</u> and sited <u>be</u> to maximise shared community use of premises, where practical. And add 'and promote social inclusion' to the end of supporting text paragraph 7.14. Supporting text paragraph 9.6 to policy EN1 has been amended as follows: '... promote play, recreation and <u>social inclusion</u> ,...'

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SA7	An additional requirement for the provision of a minimum 3 years free membership of the Cycle Hire scheme for each dwelling in new residential developments, has been added to clause (h). Provided this applies to all dwellings regardless of tenure, this will likely positively contribute towards achieving SA Objective 5 by allowing those who may not be able to utilise a cycle hire scheme due to costs, the ability to do so, whilst also positively contributing towards SA Objective 2 on good health. It was recommended that the policy team consider whether the words 'regardless of tenure' should be added to the end of clause (h)	5C5.59	8	T3	Accepted.	Last sentence of policy T3(h) is amended as follows: A minimum of three years free membership of the Cycle Hire scheme for each dwelling <u>regardless of tenure</u> , should be provided in new residential developments.
SA8	Policy T1 (e) 1 st sentence could be amended as follows: 'Development should contribute towards the improvement of <u>inclusive</u> access to public transport...' Policy T4(a) 1 st line could be amended as follows: 'Lambeth will seek better connectivity, quality, <u>accessibility</u> and capacity in public transport...'	5C5.61	8	T1 and T4	Accepted.	Policy T1 (e) 1 st sentence amended as follows: 'Development should contribute towards the improvement of <u>inclusive</u> access to public transport...' Policy T4(a) 1 st line amended as follows: 'Lambeth will seek better connectivity, quality, <u>accessibility</u> and capacity in public transport...'
SA9	There is risk there will be a reduction in the provision of family-sized units, particularly with the removal of the following supporting text: 'In all cases proposals will be expected to demonstrate	5C6.31	5	H4	Accepted.	Reinstated to para 5.43: In all cases, proposals will be expected to demonstrate that the provision of family-sized

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	that the provision of family sized units has been maximised'. It is recommended that the text is reinstated but amended to read: 'In all cases proposals will be expected to demonstrate some provision of family-sized units'.					units has been considered'.
SA10	SA recommendation 39 on the DRLLP has been incorporated into the DRLLP PSV. The supporting text to policy H5 has been amended to include the following: 'Applicants are encouraged to exceed minimum standards wherever possible'. However, there remains concern that internal space standards may not be exceeded. It is recommended this is amended to read: Applicants are encouraged to exceed minimum internal space standards wherever possible.	5C6.32	5	H5	Accepted.	Supporting text is amended to read: Applicants are encouraged to exceed minimum <u>internal space</u> standards wherever possible.
SA11	It is recommended that policy H5 includes clear cross reference to housing guidance and standards set out in the London Plan.	5C6.34	5	H5	Accepted.	The following text has been added as the first sentence to supporting text paragraph 5.47: 'Guidance and standards relating to the design and quality of residential developments is set out in the London Plan and associated guidance.'
SA12	Policy Q11 (p) states: 'The use of living (green) roofs will be strongly encouraged for flat roofs which are not used as amenity space'. It is unclear what is meant by the words 'the use of' and whether this helps achieve SA Objective 11.	5C11.24	10	Q11	Accepted.	The words 'the use of' have been removed: (p) Living (green) roofs will be strongly encouraged for flat roofs which are not used as amenity space'.
SA13	Policy EN4 includes new supporting text encouraging all development to achieve a	5C12.22	9	EN4	Accept.	The following text has been added to the end of para

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	20% reduction in CO2 emissions from on-site renewable energy generation. For clarity, the policy team may wish to include text that states this 20% reduction is in addition to the improvements beyond Part L of the Building Regulations.					9.30 in the DRLLP PSV 2020: 'Where possible, this should be in addition to the required reductions through energy efficiency measures.'
SA14	Policy Q18 states that through the preparation of the Historic Environment Strategy the council will 'support the principle of climate change mitigation alterations within the historic built environment in accordance with established conservation best practice'. While this is commended, it is recommended that adaptation is also included. Possible text could include '...climate change mitigation alterations and adaptation responses within...'	5C12.26	10	Q18	Accepted.	Amend clause (ii) of para 10.97 as follows: ii) support the principle of climate change mitigation alterations and adaption responses within the historic built environment in accordance with established conservation best practice

Table 2: SA recommendations made on the DRLLP October 2018 and policy officer response (sorted by Plan section)

Number	SA recommendation	SA commentary para	Section	Policy	Council response	Proposed change
SA69	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	5C11.10	4	D2	It is agreed that that reference to the highlighted matters can be added to para 4.8.	The first three sentences of paragraph 4.8 will be amended to read: Pre-application discussions are an important tool for achieving the best outcome on a site and

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	<p>England. The policy team may wish to consider adding this to para 4.8.</p>					<p>for ensuring that wider spatial planning objectives are met, including the alignment of development proposals with infrastructure programmes <u>and the delivery of green infrastructure</u>. They also provide an opportunity to consider proposals in relation to area regeneration schemes and wider aspirations for neighbourhoods. Developers in both the private and public sectors are strongly encouraged to engage with the council's planning service early in their thinking, and to seek initial advice from specialists (such as conservation and urban design officers, <u>tree officers</u>, <u>sustainability officers</u>, transport officers, crime prevention design advisors, Thames Water) and</p>
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						from statutory partners (such as Historic England, <u>Natural England</u> and the Environment Agency).
SA82	The policy team may wish to consider listing 'flood defences' to policy D4 clause (b)	5C13.17	4	D4(b)	The intent of the recommendation is supported. Instead of listing the term 'flood defences' in the list of clauses, it is proposed to include reference to 'flood risk mitigation' as this includes flood defences as well as other measures that mitigate flood risk.	Clause xvii) of D4b) has been amended to read: sustainable drainage systems <u>and flood risk mitigation</u> ;
SA84	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.	5C14.11	4	D4	The recommendation is supported.	Clause i) of D4b) has been amended to read: on-site provision of infrastructure, whether transport, education, health, libraries, sport and leisure, <u>waste</u> , emergency services and cultural and community provision;

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Number	SA recommendation	SA commentary para	Section	Policy	Officer response	Proposed change
SA1	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.	5C1.21	5	H6	This aspect of design will be addressed in the Design Code SPD.	No change.
SA2	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;'	5C1.23	5	H11	Accepted.	Policy H11(h) amended to read: Estate regeneration schemes should seek to increase permeability and integration into the existing urban fabric; improve <u>safety and access by for</u> walking, cycling and public transport <u>use</u> to local amenities for residents;...
SA12	It is considered that policy H5 (c) on communal amenity areas could be improved to increase and encourage the actual use of such spaces. It is recommended that the policy team revisit this aspect of the policy.	5C2.28	5	H5	Accept.	Policy H5(c) amended to read: (iii) be easily accessible to all occupants be designed to be inclusive for all users'; (vi) <u>be accessible to all residents of the development, irrespective of tenure;</u>

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						<p>Additional sentence in paragraph 5.36:</p> <p>The council expects that all developments should be able to provide amenity space in accordance with the standards set out in policy H5. <u>The quality of amenity space should meet the requirements of policy Q2.</u></p>
SA14	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).	5C2.34	5 and 6	H13 and ED14	The public use of leisure facilities intended for residents is not considered a reasonable policy requirement for this type of development.	No change.
SA22	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	5C3.31	5	H6	This is addressed by Draft London Plan (consolidated version July 2019) policy H2A clause (2).	No change.

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	appropriate, taking into account housing targets assigned to the borough					
SA23	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	5C3.33	5	H8	Whilst the importance of visitors is acknowledged, it is not considered that there is special case for them to use cars when alternative modes of transport exist. However, it is noted that parking specific to carers was removed from the DRLLP. This is considered to be important to those in specialist care as carers may require use of a car to ensure necessary care goods are available for the specific visit and the profession may not be captured under the referenced term 'healthcare professional'. As such, the policy and supporting text has been updated to make provision for	<p>Minor change to policy H8 (a)(v) to read:</p> <p>(v) 'makes adequate provision for parking for visiting <u>health and care</u> professionals and, where appropriate, for the safe storage of wheelchairs and mobility scooters, <u>in accordance with London Plan policy H15B;</u>'</p> <p>5.81 The council will also seek to ensure that developments make adequate provision for parking with reference to policy Local Plan policy T7, including for visiting <u>health and care</u> professionals.</p>

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					adequate car parking for carers.	
SA24	For clarity it is recommended the policy team revisit the anomaly between London Plan standards and intended car-parking provision for specialist housing proposals.	5C3.33	5	H8	It is not considered that there is an anomaly. The London Plan standards for this type of development are considered appropriate. Furthermore, the updated text associated with SA recommendation 23 is considered to adequately address this concern.	<p>Minor change to policy H8 (a)(v) to read:</p> <p>(v) 'makes adequate provision for parking for visiting <u>health and care</u> professionals and, where appropriate, for the safe storage of wheelchairs and mobility scooters, <u>in accordance with London Plan policy H15B;</u>'</p> <p>5.81 The council will also seek to ensure that developments make adequate provision for parking with reference to policy Local Plan policy T7, including for visiting <u>health and care</u> professionals.</p>
SA25	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 <i>additional</i> need that will arise, and would not apply where housing is	5C3.36	5	H11	A cross reference to policy S2(d) will be added to the supporting text to H11. Estate regeneration schemes will fall	<p>Minor change to policy H11 supporting text paragraph 5.107 to read:</p> <p>5.107 Local Plan policy H5 sets a</p>

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	<p>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.</p>				<p>within the requirements placed upon proposals for more than 25 residential units.</p>	<p>Lambeth-specific standard for external amenity space but policy on estate regeneration acknowledges that there may be circumstances that could justify a different approach in this type of development. Proposals of this nature should be clearly justified in a supporting statement that addresses the requirements of the policy, explains the relevant constraints and sets out the benefits of the proposed alternative approach. The requirements for provision of Green Infrastructure in policy <u>EN1 and social infrastructure in policy S2 (d) will apply.</u></p>
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SA27	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.	5C3.41 5C3.33	8	T7 H8	H8av allows for parking provision for visiting health and care professionals. For other users, it is considered that London Plan standards should apply. Furthermore, the updated text associated with SA recommendation 23 is considered to adequately address this concern.	<p>Minor change to policy H8 (a)(v) to read:</p> <p>(v) 'makes adequate provision for parking for visiting <u>health and care</u> professionals and, where appropriate, for the safe storage of wheelchairs and mobility scooters, <u>in accordance with London Plan policy H15B;</u>'</p> <p>5.81 The council will also seek to ensure that developments make adequate provision for parking with reference to policy Local Plan policy T7, including for visiting <u>health and care</u> professionals.</p>
SA30	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	5C4.47	5	H1/H11	This is considered to be adequately addressed through other policies in the DRLLP. All plan policies will apply and full cross-reference is not	No change.

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	regeneration, particularly for large-scale estate regeneration schemes.				required in every policy.	
SA31	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	5C5.49	5	H11	All plan policies will apply and full cross-reference is not required in every policy.	No change.
SA39	<p>In terms of maximising <u>range</u> 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.</p> <p>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).</p>	5C6.32	5	H5	Accept.	<p>Paragraph 5.46 amended to read:</p> <p>The internal space standards and external amenity space standards apply to all new housing in Lambeth including new-build dwellings, conversions and change-of-use schemes where new dwellings are created. <u>Applicants are encouraged to exceed minimum standards wherever possible.</u> See also Local Plan policy H11 Housing Estate Regeneration.</p>
SA40	It is considered that policy H6 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	5C6.35	5	H6	Accept.	<p>Additional sentence at the end paragraph 5.61 <u>Proposals should demonstrate mitigation of potential noise</u></p>

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	feel through vibration occupiers of upper units moving around. 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.					<u>disturbance to lower floor occupants arising from conversion.</u>
SA41	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.	5C6.39	5	H11	The policy is deliberately worded to allow for the particular circumstances associated with estate regeneration schemes, within the overarching objective of maximising provision of genuinely affordable housing in this type of development. The approach to tenure is set out in part c of the policy and paragraph 5.103 of the supporting text.	No change.
SA42	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	5C6.40	5	H12	Accept.	Amend paragraph 5.98 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

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	maintained as such' or words to that effect.					proposed in the scheme <u>and maintained as such.</u>
SA50	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	5C7.22	5	H11	This is considered to be adequately addressed through policy H5(c)	No change.
SA51	The policy team may wish to consider defining Waterloo and Vauxhall as their respective Opportunity Area designations.	5C7.23	5	H13	Accept.	Amend paragraph 5.103 to read: Proposals of this nature should be located in Waterloo and Vauxhall (<u>Opportunity Areas</u>) because these have been identified...
SA53	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	5C8.15	5	H1	Accept.	Additional sentence at the end of paragraph 5.4 to read: <u>Lambeth's Urban Design Code SPD provides guidance on optimising capacity through good design, including where new housing is proposed on small sites.</u>

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	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.					
SA55	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).	5C9.21	5	H9	<p>Parking for this type of accommodation is covered in policy T7, nothing further is needed in this policy.</p> <p>As it is no longer considered appropriate to include a threshold for parking stress, the reference to 85% will be removed from policy H6.</p>	No change.
SA70	It would be useful for either policy H11 or its supporting text to make reference to green infrastructure.	5C11.13	5	H11	Accept.	<p>Additional sentence at the end of paragraph 5.93 (DRLLP Oct 2018) to read:</p> <p><u>The requirements for provision of Green Infrastructure in policy EN1 will apply.</u></p>

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SA79	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.	5C12.14	5	H11	This is considered to be adequately addressed through policies EN3 and EN4.	No change.
SA80	Clause (e) should also refer to policy EN4, and possibly EN3 too. It is recommended the policy team revisit this.	5C12.14	5	H11	All plan policies will apply and full cross-reference is not required in every policy.	No change.
SA85	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.	5C14.12	5	H11	Cross-reference to policy Q12(c) has been included as this policy clause details specific requirements for waste on estates. This is considered appropriate to signpost in policy H11(e). Cross-reference to policy EN4 was not inserted as it is considered a borough-wide policy that would be applicable in any circumstance.	Minor change to policy H11(e) to update the cross-references as follows: See <u>also</u> Local Plan <u>policies</u> EN1(a)(ii) <u>and</u> <u>Q12(c)</u> for the approach to housing estate amenity land.

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SA14	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).	5C2.34	5 and 6	H13 and ED14	Recommendation accepted in relation to ED14.	<p>New policy clause j added which supports the shared use of leisure facilities where practical:</p> <p>“j) The potential for leisure and business facilities within hotels to be made available for public use in locations where there is an identified shortage of provision should be explored. This will be secured through planning obligations.”</p> <p>New paragraph added to supporting text:</p> <p>“Where there is an identified shortage of leisure and business facilities in the location of the proposal (swimming pools, gyms and other indoor or outdoor sports facilities) as set out in the Infrastructure Delivery Plan, the potential for any leisure and business</p>
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						facilities of this type provided as part of the hotel to be made available for use by the general public at times to be agreed with the council should be explored. This provision and associated maintenance requirements will be secured through a legal agreement.”
SA43	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.	5C6.42	6	ED1	<p>The recommendation is noted. Clause d) has changed so that a ‘high proportion of affordable housing’ is not referenced.</p> <p>The supporting text has been altered to recognise that applications will be subject to viability testing and that the maximum feasible amount of office space has been provided.</p>	<p>Clause d) of the policy has been amended to read:</p> <p>“Redevelopment of large offices for a mix of uses will be supported if the quantity of original B1a floorspace is replaced or increased as part of the development or elsewhere in the vicinity within Lambeth, incorporating existing businesses where possible. <u>Exceptionally Outside of the CAZ</u>, partial replacement of</p>

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					<p>existing B1a floorspace in a mixed use redevelopment will be considered <u>may be supported</u> where other significant planning benefits, such as a high proportion of affordable housing, are provided; <u>delivered</u> and it can be demonstrated that the maximum feasible <u>and viable</u> proportion of office floorspace is included in the scheme, <u>and/or</u> that the replacement space will result in an intensification of office use. <u>In these circumstances, viability evidence must be provided.</u></p> <p>A new paragraph is to be inserted between the existing paragraphs 6.7 and 6.8 to read:</p> <p><u>“Under clause (d) of the policy, partial replacement of office-floorspace in a mixed-</u></p>
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						<p><u>use redevelopment may be considered outside of the CAZ. Generally, no less than 50 per cent replacement floorspace will be expected in these circumstances; and in all cases the applicant must demonstrate the maximum feasible and viable quantity of replacement office floorspace has been provided. Supporting evidence must be provided with the application, including viability information; the council may seek independent validation of this information and the applicant will be expected to cover the cost of this assessment. It will also be necessary to demonstrate that other significant planning benefits will be achieved through a mixed-use approach, such as improvements to the quality, flexibility</u></p>
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						<u>and adaptability of the office space and delivery of new housing with a threshold level of affordable housing (or the maximum viable level of affordable housing subject to viability testing).”</u>
SA44	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’.	5C6.42	6	ED1	Agreed. The wording has been changed. Please note that ‘exceptionally’ is no longer used in the policy.	The phrase ‘will be considered’ has been changed to ‘may be supported’.
SA45	It is recommended the policy team revisit policy ED3 and consider whether any additional guidance is necessary to protect residential amenity.	5C6.43	6	ED3	Supporting text paragraph 6.31 states that in relation to section (c) of the policy, London Plan policy D12 relating to the Agent of Change principle <u>will</u> also apply. This policy requires new development to mitigate impacts from existing noise and other nuisance-generating	No change

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					<p>activities or uses on the proposed new noise-sensitive development.</p> <p>In turn London Plan policy E7(E) states that redevelopment proposals affecting LSIS (KIBA) land must ensure that appropriate design mitigation is provided in any residential element with particular consideration given to specific issues such as amenity for residents.</p>	
SA46	<p>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 <u>generally</u> be supported in Key Industrial and Business Areas. It may be acceptable on non-designated industrial land, in Creative Enterprise Zones <u>and in the KIBAs identified as having potential for</u></p>	5C6.44	6	ED5	<p>In accordance with the London Plan, the co-location of residential and industrial units on KIBAs will only be permitted in defined circumstances and only in locations identified in the Draft Revised Lambeth Local</p>	No change

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	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))				Plan. Work-live development is unlikely to achieve the required level of industrial intensification unless it is part of a very large redevelopment proposal in one of the areas already identified for the co-location approach.	
SA52	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.	5C7.25	6	ED8	The approach to A-boards is dealt with in Q17 – supporting text has been updated to reinforce that A-boards are not permitted on public highways, where this can be controlled.	Minor change to policy Q17 to add new supporting text to reference on-street advertisements as follows: 10.95 On-street advertisements will be assessed against policies Q1, Q6 and T2.
SA56	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	5C9.24	6	ED13	Recommendation accepted.	ED13b) amended to seek planning obligations for improvements to local transport services

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	<p>obligation may be used to improve transport facilities.</p>					<p>“Visitor attractions and major leisure and cultural activities located in the Central Activities Zone, Vauxhall and Waterloo London Plan Opportunity Areas and Brixton and Streatham major town centres will be supported. Proposals should demonstrate in a visitor management plan how the potential impacts of high volumes of visitors would be managed, including appropriate provision for short term coach parking and, if appropriate necessary, long term coach parking on site. Planning obligations will may be sought to address any additional public service provision and maintenance, including local transport services required as a result of the development in accordance with the</p>
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						<p>approach set out in Annex 10. This Planning obligations may also be sought for include improvements to the public realm, especially on routes to and from public transport nodes. Requirements for the nature of planning obligations will be appropriately benchmarked.”</p>
SA95	<p>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.</p>	5C17.26	6	ED2	<p>The comment is noted. An addition to the policy has been made to clarify that affordable workspace should be provided at the same time as the rest of the B1 floorspace.</p> <p>Given the phasing of development that is common in mixed use development, it is not felt appropriate to require affordable workspace to be</p>	<p>Clause d) has been added to the policy which reads:</p> <p><u>The affordable workspace should be made available for occupation at the same time as the rest of the B1 floorspace in the development.</u></p>

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					provided at the same time as residential occupation in the policy as this could actually prevent affordable workspace from being occupied in certain circumstances. Such a matter should be dealt with in the Section 106 agreement that secures affordable workspace, on a case-by-case basis.	
SA98	The policy team may wish to consider providing for meanwhile uses of such vacant office floorspace (related to being vacant for 2 years), (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.	5C18.15	6	ED1	The comment is noted and an addition to the supporting text is proposed to address the comment.	Addition to supporting text paragraph 6.7 to read: “The use of vacant office space for short-term meanwhile is supported, subject to other development plan policies. Short-term meanwhile uses within the two year marketing period would not count as occupation for the purposes of the

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						marketing requirements.”
SA13	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.	5C2.34	7	S2	It is considered that the policy is reasonable as the council, as local planning authority, is party to the legal agreement that secures the s106 planning obligation, so is in a position to specify the groups requiring access. This allows for access on the basis of identified need. In some cases, this will include full public access, on the basis of the identified need in the locality.	No change.
SA26	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	5C3.39	7	S2	The recommendation is noted. This part of the policy deals with very large applications and requires on-site provision where existing facilities in the area cannot	No change.

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	childcare provision in residential developments of more than 500 units. It is recommended this is revisited by the policy team.				meet the additional need. It is not generally realistic and/or reasonable to expect an applicant to create new off-site provision on land they do not own.	
SA32	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.	5C5.57	7	S2	Under the legal tests governing planning obligations, a development proposal can only be required to make a contribution that mitigates the impact of that scheme and is directly related to it. This is the reason an assessment of the additional need arising from the proposal is necessary, to assess the specific additional needs that may need to be addressed in the context of existing	No change.

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					<p>provision. It would not in every case be appropriate to require a developer to provide for general needs unrelated to their proposal. For this reason, it is not considered appropriate to include a blanket requirement in policy that all proposals should be made available to all residents of the local area. This will be assessed on a case by case basis and any planning obligations sought for public access to social infrastructure within a development proposal will be directly related to the specific identified need arising from that proposal.</p>	
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SA47	<p>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.</p>	5C6.46	7	S2	The recommendation is accepted.	<p>An addition to the end of paragraph 7.17 is proposed which reads:</p> <p><u>“Proposals for nurseries and childcare facilities should include access to an outdoor play area, of sufficient size and quality to meet the needs of the facility. This should be located away from, or be screened from, roads causing poor air quality”</u></p>
SA3	<p>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’). The policy team may wish to soften this wording to make it more achievable within the planning policy remit and development proposals.</p>	5C1.28	8	T3	Noted. Minor amendments proposed.	<p>Clause (c): ‘Lambeth will improve conditions for people to cycle and make cycling a safer, healthier, quicker and more direct attractive form of travel. Lambeth will ensure that <u>help to enable</u> people who want to cycle are able to do so and are not <u>be</u> discouraged by road danger or air quality concerns’.</p>

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SA4	It is recommended that clause (d)(ii) makes reference to pedestrians as well.	5C1.29	8	T5	Noted. Minor amendment to policy T5(e)(ii) to reference safe use by pedestrians.	Clause (e)(ii) has been amended to read: 'incorporates provision for safe use by pedestrians and cyclists'
SA5	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	5C1.30	8	T7	This is not considered necessary given the restrictive parking standards of the borough and the low anticipated rate of car parking provision in future new developments.	No change.
SA6	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).	5C1.30	8	T7	Noted. Minor amendment proposed.	Clause (d) (vi): '...ensure that all outdoor and open parking areas are permeable <u>to water</u> '.
SA15	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'. It is recommended that the policy wording is softened to be more achievable	5C2.36	8	T3	Noted. Minor amendment proposed.	Clause (c): 'Lambeth will improve conditions for people to cycle and make cycling a safer, healthier, quicker and more direct attractive form of travel. Lambeth will ensure help to enable

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						people who want to cycle can do so and not be discouraged by road danger or air quality concerns’.
SA16	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.	5C2.37	8	T2 and T3	Greater priority for pedestrians in the use of road space refers to both giving greater priority than what’s currently provided, and over other transport modes (as per the hierarchy in T1). In practice this could refer to providing wider footways, improving signage and wayfinding, providing new and improved crossing points, reducing levels of traffic on roads, slowing traffic and creating a safe and pleasant walking environment. Greater priority for cyclists in the use of road space refers to both giving greater priority than	Minor change to policy T2(b) to add: ‘ <u>In line with the hierarchy set out in T1(c)</u> , Lambeth will promote walking through improvements to pedestrian routes, streets and public spaces, by giving greater priority to pedestrians in the use of road space, introducing appropriate <u>motor</u> traffic management measures, reducing road danger from other transport modes and through improvements to signage and way-finding.’

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					<p>what's currently provided, and over other transport modes (as per the hierarchy in T1). In practice this could refer to providing cycle lanes, improving cycle signage and wayfinding, reducing levels of motor traffic on roads, slowing traffic and creating a safe and pleasant cycling environment.</p> <p>A minor change has been added to policy clauses T2(b) and T3(d) to reference the hierarchy in T1(c) in terms of providing greater priority for pedestrians and cyclists.</p>	<p>Minor change to policy T3(d) to add:</p> <p><u>'In line with the hierarchy set out in T1(c), Lambeth will promote cycling through improvements to routes, giving greater priority to cyclists in the use of road space, reducing road danger from other transport modes and through improvements to signage and facilities.'</u></p>
SA17	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	5C2.38	8	T2 and T3	Noted. Minor amendment proposed.	T2 Clause (a): ' <u>...and make walking a safer, healthier, quicker more direct attractive form of travel</u> '.

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	<p>‘...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’.</p>					<p>T3 Clause (c): ‘Lambeth will improve conditions for people to cycle and make cycling a safer, <u>healthier</u>, quicker and more direct attractive form of travel. Lambeth will help to enable people who want to cycle can do so and not be discouraged by road danger <u>or air quality</u> concerns’.</p>
SA27	<p>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.</p>	<p>5C3.41 5C3.33</p>	8	<p>T7 H8</p>	<p>London Plan policies are appropriate to Lambeth and any relaxation in standards would not be justified.</p>	<p>No change.</p>
SA33	<p>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.</p>	<p>5C5.58</p>	8	<p>T2</p>	<p>While the policy does not specifically mention shared space, it also does not preclude it either. DfT guidance has been issued to halt the implementation of shared space only: “in areas with</p>	<p>Minor change to supporting text paragraph 8.9 to include: ‘Walking and cycling are the most sustainable forms of transport, with no environmental impact but many health</p>

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					<p>relatively large amounts of pedestrian and vehicular movement, such as high streets and town centres” (DfT, 28.09.2018). To ensure pedestrian safety, particularly for people with disabilities, the elderly and young children/parents, supporting text paragraph 8.9 has been amended to include reference to considering and prioritising the safety of these user groups.</p>	<p>benefits. Lambeth believes creating places that are safe and attractive to walk around is fundamental to good place-making. People should be able to walk around Lambeth without the danger, inconvenience and unpleasantness often forced on them by the rest of the transport system. All journeys, particularly those made by public transport, involve an element of walking. Provision for pedestrians should include children and people with disabilities and other mobility needs. <u>Where space is to be shared between pedestrians and vehicles, the safety and comfort of these user groups must be considered and prioritised.</u></p>
SA38	It is noted that PN11 supports the Tramlink extension, but policy T4 on public transport infrastructure has removed	5C5.74	11 and 8	PN11 and T4	Noted. Proposed minor amendment.	Clause (a) (xii): ‘extension of the Croydon Tramlink to

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	reference to the Tramlink. The policy team may wish to revisit this anomaly.				Reinstatement of clause xii) removing reference to Streatham	Crystal Palace and Streatham';
SA57	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.	5C9.27	8	T1(e)	Noted. Minor amendment proposed, additional wording to meet SA recommendations.	Clause (e): 'Development should contribute towards the improvement of access to public transport and the improvement and delivery of walking and cycling routes that serve the site. <u>This could be achieved through the design itself, and/or through financial contributions, appropriate to the scale and impact of the development</u> '.
SA58	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.	5C9.28	8	T1(g)	Travel Plans do not perform this function, and TAs should already do this. DfT and TfL guidance provide full details of the required content of a TA which includes accident analysis and road safety issues.	No change.

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SA59	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.	5C9.29	8	T3(g)	This policy is also relevant to smaller developments because the requirement is not considered too onerous. The provision of electrical charge points is merely the provision of a standard electrical socket	No change.
SA60	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.	5C9.30	8	T4(a)	Noted. Proposed minor amendment.	Clause (a) 'development should support and enable the following projects, <u>where appropriate</u> '
SA71	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.	5C11.14	8	Para 8.10	This is not considered necessary. Policy T1 Clause (b) refers to TfL's Healthy Streets to facilitate trips by walking and cycling. The Healthy Streets indicators include references to trees	No change.

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					and other planting to provide shade, clean the air and support biodiversity.	
SA72	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.	5C11.15	8	T7	This is not considered necessary given the restrictive parking standards of the borough and the low anticipated rate of car parking provision in future new developments.	No change.
SA89	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.	5C15.14	8	T8(h)	These charge points would be located in loading bays, and would therefore be available to other users outside of the prescribed loading hours.	No change.
SA18	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. 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	5C2.44	9	EN1	Agreed. A minor amendment to supporting text paragraph 9.8 is proposed to acknowledge that the replacement of existing ground floor public open	The following amendments have been made to the final two sentences of paragraph 9.8: "Replacement of existing ground floor public open space at

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	<p>example liveability, biodiversity and air quality). It is recommended that the policy team reconsider the implications, particularly cumulatively, on this policy position.</p>				<p>space at roof level is unlikely to be acceptable in most cases but where the applicant can demonstrate that it will be of equivalent quality with full public access and maintenance arrangements, it will be considered.</p> <p>Furthermore, paragraph 9.5 has been amended so that only publically accessible roof gardens are referred to as open space.</p>	<p>roof level <u>is not achievable in most cases, however where this is proposed the applicant would need to demonstrate how it would be of equivalent quality, including how full public access would be achieved</u> to be considered of equivalent quality. Arrangements for the maintenance of replacement open space will also need to be demonstrated and <u>may would</u> be secured through a s106 legal agreement.”</p> <p>The following change has been made to the first sentence of Paragraph 9.5:</p> <p>“Existing public and private open space includes Metropolitan Open Land, common land, historic parks and gardens, district and local parks, nature conservation areas, play areas and</p>
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						adventure playgrounds, outdoor sports facilities, allotments, cemeteries and burial space, amenity areas within housing estates, communal squares and gardens, <u>roofs that are fully accessible to the public as open space (not private amenity space)</u> , areas of water, the River Thames Foreshore and Thames Path in accordance with London Plan policy.
SA63	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, <u>habitats and species</u> , and for its contribution to visual amenity <u>and ecological function</u> .	5C10.16	9	EN1	The original recommendation was meant to refer to para 9.5 rather than 9.1. The recommendation is supported and text has been amended to include the SA recommendation.	The following change has been made to the second and third sentences of Paragraph 9.5: “Public and private open space is protected for its value in providing space for leisure, recreation and sport, <u>health and wellbeing, air quality, habitats and species</u> , and for its contribution

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						to visual amenity <u>and ecological function</u> . Development on garden land will be assessed against Local Plan policy Q14.”
SA86	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).	5C14.17	9	EN7(d) and para 9.68	Accepted.	‘Exceptional circumstances’ has been removed from clause (d)
SA87	The policy team may 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 <u>if re-provided on-site</u> or if compensatory waste capacity is provided elsewhere in the borough’.	5C14.18	9	EN7 para 9.63	Accepted	Para 9.67 third sentence has been amended as follows: Redevelopment of safeguarded waste sites for other uses will only be supported if compensatory waste capacity is provided elsewhere within the borough <u>or if waste capacity is re-provided on-site with suitable mitigation measures to ensure any new development does not impact on the ability of the waste operation to function, in line with</u>

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						<u>the agent of change principle.</u>
SA90	It is considered that 'air quality' should be mentioned as a benefit in supporting text paragraph 9.6	5C15.15	9	EN1 para 9.6	Agreed. The text has been amended to include the SA recommendation.	The following change has been made to Paragraph 9.6: "Green infrastructure includes green spaces and features such as street trees and green roofs that deliver a range of benefits. These include mitigating flooding, <u>improving health and wellbeing, air quality,</u> cooling the urban environment and enhancing biodiversity and ecological resilience, as well as providing more attractive places for people."
SA7	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 <u>safe</u> and well-related to the adjacent area, not prejudice or preclude active frontages,	5C1.34	10	Q7	Accepted.	(viii) In response to the SA recommendations, minor amendments as follows: "any vehicular access, parking (particularly in undercrofts or basements) or servicing is designed so as to be <u>safe and well-related to the users of the site</u>

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	minimise impact on amenity and be visually attractive’.					<u>and wider</u> adjacent area, not prejudice or preclude active frontages, minimise impact on amenity and be visually attractive.”
SA8	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 <u>safe</u> and well-related to <u>the users of the site and wider</u> adjacent area, not prejudice or preclude active frontages, minimise impact on amenity and be visually attractive’.	5C1.34	10	Q7	Accepted	(viii) In response to the SA recommendations, minor amendments as follows: “any vehicular access, parking (particularly in undercrofts or basements) or servicing is designed so as to be <u>safe</u> and well-related to <u>the users of the site and wider</u> adjacent area, not prejudice or preclude active frontages, minimise impact on amenity and be visually attractive.”
SA19	Clarification is needed on what trees are considered ‘of value’.	5C2.53	10	Q14	Accepted.	Change. Include definition in the glossary: <u>Trees of value are those that have the capacity to deliver eco-system benefits in the form of absorbing carbon dioxide (the main greenhouse gas) and producing oxygen and to filter, absorb and reduce other pollutant gasses including sulphur dioxide, carbon monoxide, nitrogen dioxide and ozone. To achieve improved air quality trees of value will have large deciduous</u>

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						<u>canopies or have the potential to develop such in the future.</u>
SA28	The policy team may wish to revisit this policy in terms of surface materials used and their ease of use for different equality groups.	5C3.44	10	Q6	The policy does not specify materials. Separate to the Local Plan process the Council will be preparing a highways manual which will be adopted as guidance. It will include the identification of appropriate surface materials palette.	No change
SA34	The policy team may wish to clarify that the policy applies to all new development as well as the wider public realm.	5C5.63	10	Q1	This is considered to be sufficiently addressed in the opening text in para. 10.1 which states ' <i>All new development</i> ' The matter will be further addressed in the Urban Design Code SPD	No change
SA35	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	5C5.63	10	Q6	The policy does not specify materials. Separate from the Local Plan process the Council will be preparing a Highways manual	No change

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					guidance document which will include a section on appropriate paving materials schedules.	
SA36	It is 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.	5C5.63	10	Q6	The Council's approach to shared space is addressed in Policy T2's supporting text and has been further strengthened as a result of SA recommendation 33 on policy T2. Policy Q6's supporting text already contains a cross reference to policy T2.	No change.
SA48	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.'	5C6.49	10	Q2	It is not considered appropriate to elaborate on this matter given that sound attenuation standards within properties are set out in the building regulations which will apply in all conversions.	Change to para 10.3 Insert new text ' <u>For the Council's approach to conversions see policy H6.</u> '
SA49	Supporting text para 10.66 is noted - that policy Q14 'only applies to properties	5C6.49	10	Q14	Accepted. The proposed revised	Proposed text:

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	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.				policy wording includes reference.	<u>d) In addition to the requirements in (c) (i) above, where the garden development affects a property containing flats, the minimum retained communal garden must equate to 10m2 per flat. Where the development affects a property containing non-self-contained units the retained communal garden should be no less than 50m2 per ten residents.</u>
SA54	<p>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').</p> <p>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).</p>	5C8.24	10	Q27	Accepted	<p>Amend part (a) (viii) to read:</p> <p><u>'designated and non-designated heritage assets'</u></p> <p>Amend supporting text 10.141 to read:</p> <p>'See also Local Plan policies Q2, Q14, <u>Q20, Q21</u>, Q23, EN5 and Annex 5.'</p>

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SA64	<p>To maximise positive impact of landscaping on biodiversity, there may be scope to strengthen supporting text in relation to expectations on biodiversity enhancement.</p> <p>Alternatively supporting text could be strengthened to state that applications should demonstrate consideration of all aspects of the policy in their landscaping proposals.</p> <p>Perhaps all that is needed is to add to the last sentence of supporting text para 10.31 the following: ‘....</p> <p>The policy team may wish to revisit this policy and its supporting text in light of these comments against SA objective 10.</p>	5C10.20	10	Q9	Accepted	<p>Amend 10.32 to read:</p> <p>Good-quality hard and soft landscaping is encouraged. The council considers green and brown roofs to contribute towards the successful landscape quality of schemes. See also policy Q10 – Trees. See also Local Plan policies Q10, E1 <u>and EN1</u> in relation to trees, green infrastructure <u>and biodiversity</u>’</p>
SA65	<p>Policy Q9(iii) mentions existing designated habitats. Clarification is sought on what the designated habitats are. Are they SINC’s? Or should the policy refer to priority habitats, to make the policy more consistent with wording in the biodiversity action plan.</p>	5C10.21	10	Q9	Accepted	<p>Amend Policy Q9 to</p> <p>iii) protects and enhances existing designated <u>priority</u> habitats and creates new habitats/areas of nature conservation interest and biodiversity value’</p>
SA66	<p>It is recommended that the policy team revisit supporting text para 10.32 so that all applications are supported by a landscape design scheme and management/maintenance programme.</p>	5C10.22	10	Q9	Accepted	<p>Revised text of 10.33 to read:</p> <p>‘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</p>

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						programme will need to be submitted before work on site commences. Compliance will be secured through planning obligations.'
SA67	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.	5C10.24	10	Q13(b)(ii)	Policy Q13(b)(ii) seeks to provide cycle storage in front gardens/forecourts to encourage cycling in the borough, thus contributing fewer environmental impacts. The provision of cycle storage is considered to be minimal in the greater impact on biodiversity and allows for greater greening in front gardens/forecourts than parking would. Therefore, the removal of clause (ii) would not ensure fewer impacts on biodiversity in front gardens. Furthermore, policy Q14 is a borough-	No change

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					wide policy which would also be applicable to the provision of cycle storage where it occurs in gardens, and seeks to ensure that any such development would not result in loss of biodiversity.	
SA68	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 <u>or biodiversity value</u> '. 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)).	5C10.25	10	Q14(b)	Accepted	amend (b)(i) to read: 'there would be no harm to the visual amenity <u>or biodiversity value</u> '.
SA73	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. The policy team may wish to also include reference to policy EN1 in supporting text para 10.24.	5C11.20	10	Q6(v) And para 10.24	Accepted	Amended text Q6 (v) to read: 'new or enhanced open space (including gaps between buildings) and landscape/trees <u>green infrastructure</u> ; Amend final sentence of 10:24 to read: 'See also Local Plan policies <u>EN1</u> , T1, T2 and T3, and London Plan policies T2 (Healthy Streets) and D7.'

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SA74	It is recommended para 10.26 also refers to policy EN1. It is further recommended that the policy team consider how green infrastructure can be promoted in policy Q7.	5C11.21	10	Q7 and para 10.26	Part Accepted	10.26 'See further guidance on design in the National Planning Practice Guidance. See also Local Plan policies <u>EN1</u> , EN4, Q5 and Q19 -23
SA75	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.	5C11.22	10	Q10(f)	Accepted	Amended text to read: f) Wherever appropriate, the planting of additional trees should be included in new developments <u>in a coordinated way to maximise the green infrastructure network.</u> '
SA81	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).	5C12.28	10	Q18	Historic England has extensive guidance on a wide range of topics. It is not considered necessary to focus on one particular area given the policy already signposts to the HE suite of guidance generally.	No change.
SA83	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.	5C13.26	10	Q6 para 10.21	No change. The policy does not specify materials. Separate from the Local Plan process the Council will be preparing a Highways Manual	No change

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					guidance which will include schedules of appropriate paving materials.	
SA88	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.	5C14.19	10	Q12 para 10.45	The text suggests brick as the means of enclosure not as the means of screening. Hedges and soft landscaping are not robust enough to provide the enclosure itself. This matter would be better addressed when the Council's Refuse and Recycling Storage Design Guidance is revised	No change.
SA91	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.	5C15.16	10	Q10	Accepted	Additional supporting text: <u>"In Air Quality Focus Areas there will be a presumption in favour of retaining canopy cover and new development will be required to deliver additional trees of a suitable resilient type."</u>
SA92	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'.	5C15.17	10	Q14 and para	Accepted.	Include definition in the glossary: <u>Trees of value are those that have the capacity to deliver eco-</u>

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						<u>system benefits in the form of absorbing carbon dioxide (the main greenhouse gas) and producing oxygen and to filter, absorb and reduce other pollutant gasses including sulphur dioxide, carbon monoxide, nitrogen dioxide and ozone. To achieve improved air quality trees of value will have large deciduous canopies or have the potential to develop such in the future.</u>
SA93	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 <u>improve air quality</u> and support wildlife habitats, for birds, insects, reptiles and mammals such as hedgehogs.'	5C15.17	10	Q14 para 10.65	Accepted	See text below within new para 10.71: ...' <u>Landscape design should optimise the opportunities to improve air quality and support wildlife habitats...</u> '
SA9	It is 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.	5C1.37	11	PN1 – PN11	It is not considered necessary to reference the current baseline conditions of crime for each of the borough's town centres. This type of information becomes out of date quickly so can be open to misinterpretation. The ways in which	Minor amendment to policy ED8 supporting text paragraph 6.51 as follows: 'Active-frontage uses in a town centre are those that bring activity to the street frontage through a flow of people entering and leaving the premises at ground floor level and a glazed façade through which activity can be seen from the street. <u>This natural surveillance also has potential to</u>

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					<p>planning policies can reduce crime or fear of crime are dealt with in other policies, particularly Quality of the Built environment policies. The supporting text to policy ED8 Town Centres has been updated to note that natural surveillance from active-frontage uses can help to discourage crime and anti-social behaviour.</p>	<p><u>discourage crime and anti-social behaviour.</u> This includes all A and D class uses and appropriate sui generis uses such as beauty salons or nail bars; launderettes; nightclubs; and theatres...'</p>
SA10	<p>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 <u>safety and</u> 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</p>	5C1.38	11	PN5	<p>Change to ensure the policy addresses the safety record of cycleways in Clapham High Street.</p>	<p>PN5 states: <u>The council will seek to address this by:</u> e) <u>requiring enhancements to the public realm of the town centre to increase green infrastructure and to improve the safety, accessibility and environment for pedestrians and cyclists and to improve linkages through the town</u></p>

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	town centre to improve the <u>safety and environment</u> for pedestrians and cyclists;...'					<p><u>centre, across the High Street and between the town centre and the Metropolitan Open Land at Clapham Common, including projects identified through 'Your Clapham – a vision for the high street';</u></p> <p>g) <u>working with Transport for London to increase public transport provision, including bus services, in the town centre; to promote a rail service from Clapham High Street to Victoria; to lengthen the platforms at Wandsworth Road and Clapham High Street; to reduce road danger on Clapham High Street; and to improve the quality and safety of Cycleway 7;</u></p>
SA11	It is recommended clause (b) includes the word 'safe' as follows: 'support proposals that increase the <u>safe</u> permeability and navigability of the area and/or proposals that improve and facilitate <u>safe</u> 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	5C1.39	11	PN10	It is understood that this recommendation applies to PN10c)(ii) of the Draft Revised Lambeth Local Plan. Change to include reference	<p>PN10a) states:</p> <p>a) <u>The council will work with local stakeholders to support the role of Loughborough Junction as a local centre with a clear identity and sense of place. This will be done by using the railway bridges as a catalyst for change, making</u></p>

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	<p>'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 <u>safe</u> routes through the area...'</p>				<p>to the creation of safe routes. Accepted.</p>	<p><u>greater use of under-used spaces and places and bringing forward new housing where appropriate. The council will:</u> vi) <u>support proposals that increase the permeability, accessibility, navigability and safety of the area through improvements to existing walking and cycling routes and the creation of new, safe and accessible routes and opening up of key routes to previously inaccessible sites. Proposals to open up routes alongside railway arches and to contribute to the Low Line project will be supported. Proposals that harm accessibility in the town centre will be resisted;</u> <u>and clause (d): New and existing walking and cycling routes should be enhanced to reduce crime and of fear of crime through improved lighting, particularly under bridges, through arches, and</u></p>
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						<p><u>along viaducts, and frontages should be activated to create surveillance. Bike-hire stations, and car club/hire facilities, and electric vehicle charging points should be provided throughout the area.;</u></p>
SA20	<p>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.</p>	5C2.56	11	PN1 – PN11	<p>Each PN policy has been reviewed and appropriate reference has been added to both the supporting text and policy for each PN policy.</p>	<p>PN1 states:</p> <p>f) <u>Supporting measures to improve air quality, including the creation of ‘greenways’ which are located away from heavy traffic, air pollution and noise. Measures to promote and enable zero emissions vehicles across the area will be supported, including the taxi fleet serving Waterloo Station.</u></p> <p>PN2 states:</p> <p>g) <u>The council supports the highest standards of sustainable design and construction and measures to improve air quality. The implementation of, and connection to, district heating networks and other effective forms of CO2 reduction and climate change adaptation,</u></p>

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						<p><u>including innovative approaches, will be required in line with London Plan policies and to support the implementation of VNEB (NEV) energy masterplan.</u></p> <p>PN3 states:</p> <p>h) <u>Securing traffic reduction and initiatives to reduce harmful emissions and improve air quality; the creation of new high-quality, safe, accessible and animated public spaces with increased green infrastructure; improvements in provision for pedestrian movement and cyclists; improved linkages within the town centre and connections with adjoining areas; and communal use of public spaces and public art.</u></p> <p>q) <u>Brixton Road – Brixton’s ‘high street’ has seen significant highway improvements; further improvements include the delivery of the Streatham to Oval cycle way through the town centre including safety</u></p>
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						<p><u>improvements to key junctions, traffic management and air quality improvement measures, improved connections to surrounding areas; the creation of a strong visual marker at the junction of Brixton Road and Stockwell Road; preserving and enhancing the conservation area; improving the range and quality of shopping; promoting active uses on upper floors; public realm improvements; new pocket parks; and mixed-use development of key sites.</u></p> <p>PN4 states:</p> <p>e) <u>supporting sustainable travel, the accessibility and use of public transport including buses and rail services, walking and cycling through improvements to the safety and accessibility of public realm and public transport facilities and through measures to reduce the impact and dominance of road traffic and to improve air quality. Development should have regard to parking stress</u></p>
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						<p><u>across much of the area and in particular on streets around the town centre and the stations including Norbury station situated just outside the borough.</u></p> <p>PN5: e) supporting measures to improve air quality;</p> <p>PN6 states: h) <u>supporting measures to improve air quality, increase green infrastructure, reduce carbon emissions, and help to adapt to climate change.</u></p> <p>PN7 states: e) <u>The council will support measures to increase green infrastructure, improve access to open space and improve air quality.</u></p> <p>PN8 states: h) <u>Seeking the 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</u></p>
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						<p><u>the shopping frontages in Clapham Road and Brixton Road.</u></p> <p>PN9 states: e) <u>supporting proposals to increase green infrastructure, access to open space and to improve air quality;</u></p> <p>PN10 states: a) <u>The council will work with local stakeholders to support the role of Loughborough Junction as a local centre with a clear identity and sense of place. This will be done by using the railway bridges as a catalyst for change, making greater use of under-used spaces and places and bringing forward new housing where appropriate. The council will:</u></p> <p>vii) <u>support measures to improve local air quality;</u></p> <p>PN11 states: <u>The council will support the role of Upper Norwood/Crystal Palace as a district centre and work with the adjoining London boroughs to</u></p>
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					<p><u>safeguard and encourage retail uses and other appropriate town-centre uses, including housing. It will support opportunities for physical improvements to the centre which enhance and improve its character, increase green infrastructure, improve air quality and will seek to improve traffic, safety, accessibility and environmental conditions for pedestrians and cyclists in the area and public transport links to other parts of London. The council will support the vibrant arts and cultural scene and also encourage the growth of the creative and digital industries sector in the area. New housing in the wider Upper Norwood/Crystal Palace area, including at the Central Hill Estate, will be supported.</u></p> <p>d) <u>investigating with Transport for London and other adjoining boroughs ways in which traffic conditions in the area can be improved to ameliorate access to sustainable modes of</u></p>
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						<u>transport, control speeds, reduce congestion and improve air quality, including the consideration of re-introducing two-way working at the triangle and a co-ordinated approach to road danger reduction, parking and servicing control and management;</u>
SA21	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.	5C2.57	11	PN7 and PN9	PN7 and PN9 have been reviewed and now make appropriate references to reducing traffic dominance/congestion and improving levels of walking and cycling.	PN7 states: c) <u>The council will work with stakeholders to promote improvements to public transport services to the area, including accessibility improvements to the rail stations and the wider objective to improve the reliability and frequency of rail services across the area. The council will work with Transport for London to reduce traffic dominance caused by Tulse Hill gyratory, seeking to introduce two-way working, creating better, safer connections for walking and cycling and an improved environment.</u>

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						<p>d) <u>The council will bring forward improvements to conditions for walking and cycling through the Healthy Route Network.</u></p> <p>f) v) <u>Tulse Hill – improving its role as a gateway to the wider West Norwood area. Taller landmark buildings are supported where they provide a focal point for the gateway and reinforce the sense of destination. Given the area’s high accessibility the density of new development should be optimised provided the architectural quality and detailing is of a high standard to enhance the appearance of the town centre and does not harm locally important views or the setting of heritage assets. Specific objectives include refurbishment of the railway station, with improved access and intensification of uses around the station interchange; taller buildings around the station; supporting higher density residential-led growth with</u></p>
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						<p><u>mixed-use retail and food and drink uses; encouraging improved active frontages along either side of the railway line; improved links from Tulse Hill Station to the area to its east; supporting improvements to the public realm to improve safety, accessibility and connectivity; and removal of the gyratory system which causes significant severance to the area, carrying high volumes of traffic on the South Circular and resulting in a hostile environment for walking and cycling.</u></p> <p>PN9 states:</p> <p>f) <u>improving walking and cycling links to and from the area, particularly to Brixton and West Norwood as part of Lambeth’s Healthy Route Network and supporting Brixton Liveable Neighbourhood;</u></p>
SA29	The PN policies could be strengthened to ensure public realm environments are fully accessible and/or inclusive, for example PN1(e) could be reworded to	5C3.47	11	PN1 – PN11	Each PN policy has been reviewed to ensure that public realm	<p>PN1 states:</p> <p>g) <u>Promoting a high quality, permeable, safe and</u></p>

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	<p>'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'.</p>				<p>environments are fully accessible and/or inclusive.</p>	<p><u>accessible public realm that is durable, well designed and maintained to reinforce Waterloo's status as a world class place and supporting the delivery of the Waterloo and South Bank Public Realm Framework. The combination of the riverfront, streetscapes, piazzas, squares and green spaces contribute to the broader public realm and are places for people to meet, socialise, activate and dwell as well as move through. Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events, and actively contribute to the enhancement of the collective public realm and increase the amount of green infrastructure in the area. Priority projects include Victory Arch Square, Waterloo Bridge Undercroft, Concert Hall Approach, Sandell Street,</u></p>
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						<p><u>the Spine Route and Emma Cons Gardens.</u></p> <p>PN2 states:</p> <p>h) <u>Improving the transport experience throughout the area by reducing the dominance of road traffic, increasing the capacity of public transport infrastructure and maximising opportunities to walk and cycle safely and comfortably throughout the whole area. This will include the replacement of the existing one-way road system to make it two-way and the building of a new modern bus station and canopy supported by an improved, accessible public realm and connectivity with surrounding areas. Simplified road junctions and crossings will concentrate movements along natural desire lines throughout the whole area.</u></p> <p>PN3 states:</p> <p>f) <u>Securing traffic reduction and initiatives to reduce harmful</u></p>
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						<p><u>emissions and improve air quality; the creation of new high-quality, safe, accessible and animated public spaces with increased green infrastructure; improvements in provision for pedestrian movement and cyclists; improved linkages within the town centre and connections with adjoining areas; and communal use of public spaces and public art.</u></p> <p>PN4 states:</p> <p>e) <u>supporting sustainable travel, the accessibility and use of public transport including buses and rail services, walking and cycling through improvements to the safety and accessibility of public realm and public transport facilities and through measures to reduce the impact and dominance of road traffic and to improve air quality. Development should have regard to parking stress across much of the area and in particular on streets around the town centre and the stations including Norbury</u></p>
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						<p><u>station situated just outside the borough.</u></p> <p>f) <u>improving Streatham’s sense of place and visitor experience through investment in Streatham’s Heritage at Risk assets, existing public spaces, the creation of new, safe and accessible public realm and increasing green infrastructure.</u></p> <p>PN5 states:</p> <p>e) <u>requiring enhancements to the public realm of the town centre to increase green infrastructure and to improve the safety, accessibility and environment for pedestrians and cyclists and to improve linkages through the town centre, across the High Street and between the town centre and the Metropolitan Open Land at Clapham Common, including projects identified through ‘Your Clapham – a vision for the high street’;</u></p> <p>PN6 states:</p>
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						<p>e) <u>developing and enhancing its sense of place by introducing measures that will reduce the severance caused by Clapham Road, particularly in the town centre, reduce road danger and improve environmental and accessibility conditions for pedestrians and cyclists;</u></p> <p>PN7 states:</p> <p>c) <u>The council will work with stakeholders to promote improvements to public transport services to the area, including accessibility improvements to the rail stations and the wider objective to improve the reliability and frequency of rail services across the area. The council will work with Transport for London to reduce traffic dominance caused by Tulse Hill gyratory, seeking to introduce two-way working, creating better, safer connections for walking and cycling and an improved environment.</u></p> <p>PN8 states:</p>
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						<p>h) <u>Seeking the improvement of traffic, air quality and environmental conditions for pedestrians and cyclists, the quality and accessibility of the public realm and linkages between Kennington Park and other spaces and the shopping frontages in Clapham Road and Brixton Road.</u></p> <p>PN9 states:</p> <p>d) <u>supporting further improvements to the quality, safety and accessibility of the public realm, convenient linkage between the station and adjoining areas, and opportunities for improvements to the station;</u></p> <p>PN10 states:</p> <p>vi) <u>support proposals that increase the permeability, accessibility and navigability of the area through improvements to existing walking and cycling routes and the creation of new, safe and accessible routes and</u></p>
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						<p><u>opening up of key routes to previously inaccessible sites. Proposals to open up routes alongside railway arches and to contribute to the Low Line project will be supported. Proposals that harm accessibility in the town centre will be resisted;</u></p> <p>PN11 states:</p> <p><u>The council will support the role of Upper Norwood/Crystal Palace as a district centre and work with the adjoining London boroughs to safeguard and encourage retail uses and other appropriate town-centre uses, including housing. It will support opportunities for physical improvements to the centre which enhance and improve its character, increase green infrastructure, improve air quality and will seek to improve traffic, safety, accessibility and environmental conditions for pedestrians and cyclists in the area and public transport links to other parts of London. The council will support the vibrant arts and cultural scene and also</u></p>
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						<u>encourage the growth of the creative and digital industries sector in the area. New housing in the wider Upper Norwood/Crystal Palace area, including at the Central Hill Estate, will be supported.</u>
SA37	The policy team may wish to consider the merits of safeguarding these uses (cultural areas/specialist food and retail outlets) 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.	5C5.67	11	PN2	The supporting text is clear about the importance of venues and facilities that add to Vauxhall's character. Any proposals relating to these schemes would be assessed against relevant Local Plan policies, particularly ED8, ED9 and ED13. The agent of change principle would also apply.	No change.
SA38	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.	5C5.74	11 and 8	PN11 and T4	PN11 is correct in supporting the aspiration for the Tramlink extension to Upper Norwood/Crystal Palace and it has	No change.

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					since been reinserted in policy T4.	
SA61	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.	5C9.38	11	PN5	Change to include support for platform lengthening at Clapham High Street in PN5.	PN5 states: <u>The council will seek to address this by:</u> g) <u>working with Transport for London to increase public transport provision, including bus services, in the town centre; to promote a rail service from Clapham High Street to Victoria; to lengthen the platforms at Wandsworth Road and Clapham High Street; to reduce road danger on Clapham High Street; and to improve the quality and safety of Cycleway 7;</u>
SA62	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.	5C9.39	11	PN8	This is already adequately addressed through PN8h). It should be noted that reference has been added to the implementation of the council's Healthy Route	No change.

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					Network in the area.	
SA76	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 <u>green</u> open spaces where possible'.	5C11.26	11	PN2(g)	It is understood that this recommendation applies to PN2h) of the Draft Revised Lambeth Local Plan. The policy seeks to support the creation of enlarged and open spaces where possible – it is not considered necessary for the policy to specify that these must be 'green'. As set out paragraph 9.5 of the Local Plan sets out that the term open space covers a range of uses and not necessarily 'green' open space.	No change.
SA77	It is considered that policy PN3(e) could make explicit reference to green infrastructure.	5C11.26	11	PN3	PN3 relates to supporting creative and digital industries within the CEZ. It is not considered	No change.

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					appropriate to make specific reference to green infrastructure in this policy because green infrastructure would be sought on all types of development and not just those relating to the creative and digital industries. Green infrastructure is referenced in PN3f).	
SA78	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.	5C11.26	11	PN4, PN5, PN6, PN7, PN9, PN11	PN4, PN5, PN6, PN7, PN9 and PN11 have been reviewed to ensure appropriate reference to 'greening' of these places is included in each of the policies.	<p>PN4 states:</p> <p>w) <u>improving Streatham's sense of place and visitor experience through investment in Streatham's Heritage at Risk assets, existing public spaces, the creation of new, safe and accessible public realm and increasing green infrastructure.</u></p> <p>PN5 states:</p> <p>e) <u>requiring enhancements to the public realm of the town centre to increase green</u></p>

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						<p><u>infrastructure and to improve the safety, accessibility and environment for pedestrians and cyclists and to improve linkages through the town centre, across the High Street and between the town centre and the Metropolitan Open Land at Clapham Common, including projects identified through 'Your Clapham – a vision for the high street';</u></p> <p>PN6 states:</p> <p>h) <u>supporting measures to improve air quality, increase green infrastructure, reduce carbon emissions, and help to adapt to climate change.</u></p> <p>PN7 states:</p> <p>e) <u>The council will support measures to increase green infrastructure, improve access to open space and improve air quality.</u></p> <p>PN9 states:</p> <p>e) <u>supporting proposals to increase green infrastructure,</u></p>
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						<p><u>access to open space and to improve air quality;</u></p> <p>PN11 states:</p> <p><u>The council will support the role of Upper Norwood/Crystal Palace as a district centre and work with the adjoining London boroughs to safeguard and encourage retail uses and other appropriate town-centre uses, including housing. It will support opportunities for physical improvements to the centre which enhance and improve its character, increase green infrastructure, improve air quality and will seek to improve traffic, safety, accessibility and environmental conditions for pedestrians and cyclists in the area and public transport links to other parts of London. The council will support the vibrant arts and cultural scene and also encourage the growth of the creative and digital industries sector in the area. New housing in the wider Upper Norwood/Crystal Palace area, including at the Central Hill Estate, will be supported.</u></p>
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Appendix 1: SA Recommendations and policy response

SA94	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.	5C15.18	11	All PN policies	Each PN policy has been reviewed and appropriate reference has been added to both the supporting text and policy for each PN policy.	<p>PN1 states:</p> <p>i) <u>Supporting measures to improve air quality, including the creation of ‘greenways’ which are located away from heavy traffic, air pollution and noise. Measures to promote and enable zero emissions vehicles across the area will be supported, including the taxi fleet serving Waterloo Station.”</u></p> <p>PN2 states:</p> <p>j) <u>The council supports the highest standards of sustainable design and construction and measures to improve air quality. The implementation of, and connection to, district heating networks and other effective forms of CO2 reduction and climate change adaptation, including innovative approaches, will be required in line with London Plan policies and to support the implementation of VNEB (NEV) energy masterplan.</u></p>
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Appendix 1: SA Recommendations and policy response

						<p>PN3 states:</p> <p>k) <u>Securing traffic reduction and initiatives to reduce harmful emissions and improve air quality; the creation of new high-quality, safe, accessible and animated public spaces with increased green infrastructure; improvements in provision for pedestrian movement and cyclists; improved linkages within the town centre and connections with adjoining areas; and communal use of public spaces and public art.</u></p> <p>r) <u>Brixton Road – Brixton’s ‘high street’ has seen significant highway improvements: further improvements include the delivery of the Streatham to Oval cycle way through the town centre including safety improvements to key junctions, traffic management and air quality improvement measures, improved connections to surrounding areas; the creation of a strong</u></p>
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Appendix 1: SA Recommendations and policy response

						<p><u>visual marker at the junction of Brixton Road and Stockwell Road; preserving and enhancing the conservation area; improving the range and quality of shopping; promoting active uses on upper floors; public realm improvements; new pocket parks; and mixed-use development of key sites.</u></p> <p>PN4 states:</p> <p>f) <u>supporting sustainable travel, the accessibility and use of public transport including buses and rail services, walking and cycling through improvements to the safety and accessibility of public realm and public transport facilities and through measures to reduce the impact and dominance of road traffic and to improve air quality. Development should have regard to parking stress across much of the area and in particular on streets around the town centre and the stations including Norbury station situated just outside the borough.</u></p>
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Appendix 1: SA Recommendations and policy response

						<p>PN5 states: e) supporting measures to improve air quality;</p> <p>PN6 states: i) <u>supporting measures to improve air quality, increase green infrastructure, reduce carbon emissions, and help to adapt to climate change.</u></p> <p>PN7 states: f) <u>The council will support measures to increase green infrastructure, improve access to open space and improve air quality.</u></p> <p>PN8 states: i) <u>Seeking the 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.</u></p> <p>PN9 states:</p>
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Appendix 1: SA Recommendations and policy response

						<p>f) <u>supporting proposals to increase green infrastructure, access to open space and to improve air quality;</u></p> <p>PN10 states:</p> <p>x) <u>The council will work with local stakeholders to support the role of Loughborough Junction as a local centre with a clear identity and sense of place. This will be done by using the railway bridges as a catalyst for change, making greater use of under-used spaces and places and bringing forward new housing where appropriate. The council will:</u></p> <p><u>support measures to improve local air quality;</u></p> <p>PN11 states: <u>The council will support the role of Upper Norwood/Crystal Palace as a district centre and work with the adjoining London boroughs to safeguard and encourage retail uses and other appropriate town-centre uses, including housing. It</u></p>
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Appendix 1: SA Recommendations and policy response

					<p><u>will support opportunities for physical improvements to the centre which enhance and improve its character, increase green infrastructure, improve air quality and will seek to improve traffic, safety, accessibility and environmental conditions for pedestrians and cyclists in the area and public transport links to other parts of London. The council will support the vibrant arts and cultural scene and also encourage the growth of the creative and digital industries sector in the area. New housing in the wider Upper Norwood/Crystal Palace area, including at the Central Hill Estate, will be supported.</u></p> <p>di) <u>investigating with Transport for London and other adjoining boroughs ways in which traffic conditions in the area can be improved to ameliorate access to sustainable modes of transport, control speeds, reduce congestion and improve air quality, including the consideration of re-</u></p>
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Appendix 1: SA Recommendations and policy response

						<p><u>introducing two-way working at the triangle and a co-ordinated approach to road danger reduction, parking and servicing control and management:</u></p>
SA96	<p>For clarity, the policy team may wish to clarify that the protection of D1 and B1 upper level floorspace is for the indoor markets.</p>	5C17.49	11	PN3	<p>Change to clarify that the protection of D1 and B1 applies to the upper floors of the indoor markets.</p>	<p>PN3 states: This will be achieved by: b) <u>Requiring in the indoor markets (as shown on the Policies Map) that no less than 50 per cent of floorspace should be in A1 use and no more than 50 per cent floorspace should be in A3 use within each indoor market (Brixton Village, Market Row, Reliance Arcade), subject to a management plan being in place that is agreed between the council and the managers of the indoor markets. The thresholds for A1 and A3 floorspace for each indoor market relate to ground floor units and connected upper floors that share the same access for each indoor</u></p>

Appendix 1: SA Recommendations and policy response

						<p><u>market. All independently accessed upper floorspace in each indoor market currently in D1 or B1 use will be protected.</u></p>
SA97	<p>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.</p>	5C17.50	11	PN4	<p>Change to reinforce the support for office floorspace in Streatham, including space for creative and digital industries.</p>	<p>PN4 states: <u>The vision for Streatham will be delivered by:</u></p> <p>a) <u>supporting development which enhances the vitality and viability of the town centre by bringing forward new housing, retail, leisure, offices and workspace for creative and digital industries, whilst being sensitive to the centre’s conservation area status and valued heritage assets.</u></p>